Kaplan Student Record Management Policy

Scope

This policy applies to Kaplan Business School, Kaplan Professional, Kaplan Higher Education Pty Ltd (trading as Kaplan Professional, Murdoch College, and Kaplan International College Adelaide), and Kaplan International NZ Limited operating as Massey University College (Kaplan).

Purpose

Kaplan's student records provide evidence of actions and decisions and represent a vital asset to support its daily functions and operations. This policy outlines the principles, roles and responsibilities that govern the recordkeeping of student records at Kaplan.

Policy Statement

The management of student records protects the interests of Kaplan, the rights of graduates and current students, and helps to deliver Kaplan's services and obligations in consistent and equitable ways.

Kaplan is committed to complying with relevant legislation and delivering better outcomes through the best practice management of these core assets.

Student data and information is managed in accordance with Kaplan's Privacy Policy and should be read in conjunction with this policy.

All student information collected by Kaplan will be retained as part of a database and will be securely monitored and maintained by Kaplan. Personal information will not be made available to a third party without the written authority of the individual concerned, unless Kaplan is legally required to share this information, or as otherwise outlined in Kaplan's Privacy Policy.

If an individual has any concerns regarding the handling or storage of their personal information, or they wish to access their personal information, the individual should contact the Kaplan Privacy Officer at privacy@kaplan.edu.au

Definitions

AQF means the Australian Qualifications Framework.

ASQA means the Australian Skills Quality Authority.

AVETMISS means the Australian Vocational Education and Training Management Information Statistical Standard.

ELICOS means English Language Intensive Courses for Overseas Students (Australia).

ESOS Act means Education Services for Overseas Students 2000 (Australia).

FEE-HELP is an Australian loan scheme that assists eligible fee-paying students to pay all or part of their tuition fees at university and other higher education providers.

International student means a student on an Australian student visa (if studying in Australia) or a New Zealand student visa (if studying in New Zealand).

Non-award course means a course leading to a qualification or an award not covered by the Australian Qualifications Framework (AQF).

NZQA means the New Zealand Qualification Authority.

PRISMS means the Provider Registration International Student Management System (PRISMS) – an Australian Government secure online system that allows providers to issue Confirmations of Enrolment (CoEs). PRISMS is used by government agencies to monitor student compliance with visa conditions and to monitor educator provider compliance with the ESOS Act 2000.

PTE means a Private Training Establishment that provides education or training (New Zealand).

RPL means Recognition of Prior Learning - an assessment process that involves assessment of an individual's relevant prior learning (including formal, informal and non-formal learning) to determine the credit outcomes of an individual application for credit.

RTO means a Registered Training Organisation that is a training provider registered by ASQA (or state regulator) to deliver Vocational Education and Training (VET) services, and provide quality training and qualifications that are nationally recognised (Australia).

TCSI means Transforming the Collection of Student Information – a government information system that contains a range of student and staff data submitted by higher education and VSL providers that from 2020 is gradually replacing HEIMS (Higher Education Information Management System).

VET Student Loans is an Australian loan scheme that assists eligible full fee paying students studying an approved vocational education and training qualification to pay their tuition fees.

Policy Principles

Kaplan adopts the following principles:

- Student records are appropriately created, managed, maintained and disposed of in accordance with legislative requirements, policies and recognised standards of best practice.
- Student recordkeeping practices are set up to support all administrative activities of Kaplan.
- Student recordkeeping practices are consistent across the organisation.
- Information in the form of records is:
  - ready for re-use and remains accessible for as long as needed
  - accessed across the organisation only by those with legitimate need
  - accurate, up-to-date and complete.
- Levels of responsibility are established regarding recordkeeping as relevant to all functions, processes, activities and transactions.
- Systems and staff protect information from unauthorised access, alteration, deletion or misuse.
- Everyone understands and appreciates the value of information as an asset for the organisation.

Governance

Kaplan has a duty to ensure that all its registered education providers comply with the requirements of legislation and any regulations with respect to any student records for which Kaplan is responsible.

Formal responsibility for the recordkeeping, monitoring and review of student records will be delegated to the Quality, Regulations and Standards (QRS) Team. The role of the QRS Team is to:

- implement records management policies for the organisation as a whole
- collaborate with business units and establish standards for recordkeeping in line with legislative requirements
- provide student recordkeeping guidance to business units
- develop electronic student records management strategies
- work with recordkeeping responsible staff in each business unit to develop coherent information across the organisation:
  - work with other accountable stakeholders, including officers and executive management, to ensure that student recordkeeping systems support organisational and public accountability.

Responsibilities

Staff

- Relevant Managers retain responsibility for ensuring appropriate systems and processes are in place for the capture, storage and disposal of records within their areas of responsibility, and that their team members are aware of their recordkeeping responsibilities and on how to meet them.
- All staff and contractors of Kaplan have an obligation to adhere to the proper and accurate keeping of

records within their areas of responsibility.

- Staff are aware of their responsibilities to create, capture and maintain records, how to achieve these responsibilities, and where to access further assistance if they require it.
- Information Technology (IT) Services retain responsibility for the capture, storage and subsequent migration or disposal of records captured to the system and perform regular audits on user access.

Systems and Processes

- Electronic and hardcopy records are never destroyed without first undergoing a process of appraisal and the approval of the relevant authority. The destruction of records must be always correctly documented.
- Records and information management requirements are identified and assessed in system acquisition or development, and evidence retained of this assessment.
- Records and information management requirements are identified and assessed when entering into cloud or similar service arrangements.

Access to Student Records

It is Kaplan's intent to ensure that current and past students have timely access to their records of enrolment, financial status and academic progress. Kaplan maintains up-to-date student records relating to enrolment and ongoing participation through the relevant School's Student Management Systems (SMS).

To access their records, current and past students are required to contact their relevant School's Student Services team. An administration fee may apply.

Retention of Student Records

Kaplan retains student records for the period(s) set out in the table below. Kaplan's Student Management Systems are compatible with government systems to allow for regulatory reporting.

AUSTRALIA **STUDENT RECORD MANAGEMENT POLICY RETENTION PERIODS**	
Documents retained	**Minimum retention period(s)**
Records of ALL students, including: • current residential address • mobile phone number (if any) • email address (if any) • amount of money paid to Kaplan • amounts owing to Kaplan • duration of course paid for • written agreement(s) between the student and Kaplan • amount to be charged for the student to access their records (if applicable), and • up-to-date records of assessment.	Until two years after the person ceases to be a student
Student financial records including: • the total amount of fees • payment terms • any non-refundable deposit or administration fee and • fees and charges for additional services	Seven years
Student complaints and appeals records (excluding Vocational Education)	Five years from the date the complaint or appeal was lodged
FEE-HELP and VET Student Loans application documentation	Seven years
Records required for legal action	Retained until the completion of that legal action, including appeals.

INTERNATIONAL STUDENT RECORDS	
Details of accepted students, including: • name and gender • course/program name, location, start date and expected duration of the student's course/program at Kaplan • date of birth, country of birth and nationality • details of person who has legal authority to act on the student's behalf (if the student is under 18 years old) • date when the student is expected to complete their course at Kaplan • amount of tuition and non-tuition fees received before confirming the student's enrolment using PRISMS • total tuition fees required to be paid to undertake full course • whether premiums have been paid for student health insurance before the course commences • if the student has undertaken a test to determine their English competency, the name of the test and the course taken, and the score • the location of the Australian government immigration office where the student's visa application was lodged • the student's passport number and visa number (if applicable).	Until the information is entered into PRISMS – within 14 days of the student being accepted into their course at Kaplan (unless retained for two years as above – such as through the written student agreement)
• provider transfer requests • variation in enrolment load that may affect students' duration of study • course progress • attendance • course credit / RPL • applications for deferment or suspension • a written record of any critical incident and remedial action taken.	Until two years after the person ceases to be a student
HIGHER EDUCATION PROVIDER RECORDS	
Certification documentation, including: • A testamur and • Records of results, academic transcript or similar documentation.	Indefinite – electronic records containing information on student results for Australian Qualifications Framework (AQF) qualifications will be retained for 30 years after the student's course completion date, to enable re-issuance of statements of attainment or qualifications (if required)
Examinations and assessments, including RPL assessment evidence	12 months from the date on which the grade decision was made (unless relating to a complaint or appeal – see above)
VOCATIONAL EDUCATION PROVIDER RECORDS	
Vocational education records, which cover: • attainment of units of competency • statements of attainment and • qualifications.	30 years
Student Assessments, including RPL assessment evidence	Two years from the date on which the judgement of competence was made (unless relating to a complaint or appeal – see below)
RTO registration information, including: • policies & procedures • training delivery and assessment strategies • assessment policies • assessment tools/instruments and • complaints, grievances and appeal records.	For the duration of the current RTO registration period (seven years) for audit purposes
FOUNDATION PROGRAM, ELICOS AND NON-AWARD PROVIDER RECORDS	
Attendance records	Until two years after the person ceases to be a student
Assessment records	
Certificates	Indefinitely
Financial records	Seven years

NEW ZEALAND STUDENT RECORD MANAGEMENT POLICY RETENTION PERIODS	
Documents retained	**Minimum retention period(s)**
Records of ALL students, including: • full name and address of the student • contact details for the student • the student's national student number (where the student has a national student number) • nationality and whether a domestic or international student • the education or training in which the student is enrolled • the start and finish dates of the education or training • details of the student meeting the entry requirements of the education or training including, where applicable, scores for English language entry requirements • invoices and receipts for fees paid to the PTE and the dates of payment, with course fees, commissions, accommodation fees, living expenses, and other fees separately identified. For overseas students: • their visa (if any) and other immigration details • the contact details of any agent through whom the student enrolled at the PTE • a copy of the student health and travel insurances • student fee protection trustee records, and • passport numbers.	Until at least two years after the completion of the education or training in which the student is enrolled
Academic results	Indefinite
Assessment materials, including RPL assessment evidence	12 months from the date of completion of that education or training
Attendance records	For the duration of the student's enrolment

All student records at Kaplan are stored securely and kept confidential.

Where student records and personal data held by Kaplan is no longer required for Kaplan's administration purposes, and the retention is not required by law, then Kaplan will destroy the information by a secure means.

Student Records Protection

Higher Education, Pathways, ELICOS and Non-award courses

In the event that Kaplan ceases to operate, arrangements will be made for all student records to be held by an authorised representative organisation on behalf of Kaplan (such as a new provider).

Vocational Education and Training

In the event that Kaplan ceases to operate, arrangements will be made for all student records to be transferred to the Australian Skills Quality Authority (ASQA), including:

- certification documentation for each AQF qualification completed
- a statement of attainment for all units of competency completed for students who have not completed a full qualification
- any training and/or assessment activities undertaken that were only in partial fulfilment of a unit of competency.

New Zealand

In accordance with the *PTE Enrolment and Academic Records Rules 2012*, a back-up copy for all records referred to below must also be kept in a manner that is accessible in the event of PTE closure, natural disaster, or emergency, and for at least the period of time the particular records themselves are required to be kept:

- Records of individual student assessment and examination results that include the name of the student, the date of achievement and the relevant grade.
- Records of student attendance.

Reporting

In alignment with government and regulatory requirements, Kaplan is required to report on student data in accordance with scheduled reporting dates. These reporting requirements include, but are not limited to:

- AVETMISS
- FEE-HELP Estimates & Declarations
- PRISMS
- Quality Indicators
- TCSI

Recordkeeping

Kaplan maintains and monitors recordkeeping to ensure:

- student records requiring long term or permanent retention, are identified and managed appropriately including, where applicable, their transfer to Kaplan's archives when no longer required as active student records
- a copy of testamurs, records of results, academic transcripts and statements of attainment will be electronically kept in the student's academic file
- Kaplan takes all reasonable steps to protect the security of personal information that it holds and maintains the accuracy and relevance of the data it holds – including the implementation of appropriate measures to protect electronic records and records stored and generated in hard copy
- recordkeeping requirements are identified and addressed in the development and or purchase of all Kaplan business systems and that special consideration is given to outsourced, cloud based or similar service arrangements - including the management of records through system transitions and/or migrations
- student records must be disposed of in accordance with legislative requirements, policies and recognised standards of best practice
- Kaplan retains student records in a manner that safeguards them against unauthorised access, and which ensures that copies of records can be produced if the originals are destroyed or inaccessible.

Relevant Legislation

As a registered higher education provider, Kaplan operates under strict laws and regulations. Policies and procedures are in place to ensure compliance with such laws. Below lists the most relevant legislation which applies to this policy:

Australia

- Compliance Standards for RTOs and Fit and Proper Person Requirements 2025
- Education Services for Overseas Students Act 2000 (ESOS Act)
- Education Services for Overseas Students Regulations 2019
- ELICOS Standards 2018
- Foundation Program Standards 2021
- Higher Education Standards Framework (Threshold Standards) 2021
- National Code of Practice for Providers of Education and Training to Overseas Students

2018 (National Code)

- National Vocational Education and Training Regulator Act 2011
- Outcome Standards for RTOs 2025
- Privacy Act 1988
- Tertiary Education Quality and Standards Agency Act 2011 (TEQSA Act)

New Zealand

- Education Act 1989
- Guidelines for the Education (Pastoral Care of International Students) Code of Practice 2016 (including 2019 amendments)
- PTE enrolment and academic records rules 2012
- Privacy Act (2020)

Relevant Policies

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

- Academic Success Policy
- Admission Policy
- Assessment Policy
- Attendance Policy
- Diversity, Inclusion and Equity Policy
- Grievances, Complaints and Appeals Policy
- Online Content Recording, Storage & Use Policy
- Privacy 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	Governance and Compliance
Responsible Officers	Director, Quality Assurance and Governance
Implementation Officer	General Manager, National Operations (KBS), Regional Director, Academic (KIL Aus), Country Director (KIL NZ), Head of Operations (KP), College Director (MIT), Deputy Director, Operations (UoAC)
Review Date	June 2028
Approved by:	
Vice President, Academic under a standing delegation from the KBS and KHE Academic Boards	

Version	Authored by	Brief Description of the changes	Date Approved	Effective Date
4.1	Quality, Regulation and Standards Team	• Immaterial changes to include Standards for RTOs 2025 and the new requirement to retain VE student assessments for two years	13.06.2025	1.07.2025
4.2	Quality, Regulation and Standards Team	• Scope updated to remove University of Adelaide College and to add Kaplan International College Adelaide. • Minor editing and formatting changes.	10.06.2026	02.07.2026