

Recording, Storage and Use Policy

Scope

This policy applies to all current students at Kaplan Business School, Kaplan Professional and Kaplan Higher Education Pty Ltd (trading as Murdoch College and Kaplan International College Adelaide) (Kaplan). It also applies to Kaplan Business School graduates who have lifetime online access to subjects that formed part of their completed degree.

It applies to the recording, transcription, automated capture, storage, access, use and sharing of live course content for teaching, learning, assessment and student access purposes, regardless of platform, delivery mode, location, device or technology used.

Without limitation, this policy applies to the use of recording tools, transcription tools, AI notetakers, meeting assistants, bots, agents, automated summarisation tools and similar technologies in relation to live course content.

This policy does not apply to internal Kaplan business meetings, staff briefings or operational activities, except where those activities involve the recording, transcription, automated capture, storage or use of live course content.

This policy does not apply to pre-recorded content used within a class, except where that content is recorded, transcribed, captured, copied, shared, uploaded or otherwise processed as part of, or arising from, a live class.

Purpose

This policy establishes requirements for the authorised use of live course content as study resources for students and for approved teaching, learning and assessment purposes.

Live course content may contain personal information, teaching materials, assessment content and contributions made by students, staff, guest presenters and other participants.

Its objectives are to support flexible and accessible learning, enhance the student learning experience, while balancing the need to protect privacy and confidentiality, through establishing clear requirements for the management of live course content.

Definitions

Terms	Definitions
AI-enabled capture tool	means any artificial intelligence or automated tool that records, transcribes, captions, summarises, analyses, joins, monitors or otherwise processes live course content or captured class content. This includes AI notetakers, meeting assistants, bots, agents, transcription tools, summarisation tools and similar technologies.
Captured class content	means any recording, transcript, caption, automated note, AI-generated note, summary, screenshot, screen capture, file, extract or other output created from live course content.
Class	means any forum dedicated to delivering academic content through presentations, explanations, analyses, discussions, activities or assessments. Examples include lectures, workshops, tutorials, subject-related consultations, webinars and other online, hybrid or face-to-face learning forums or meetings.
Kaplan-authorised	means authorised by Kaplan for the relevant purpose, including through an authorised Kaplan platform, written permission, an approved reasonable adjustment, or another approval process determined by Kaplan and evidenced in writing.
Live course content	means content, communication, discussion, activity or interaction that occurs during a class, including teaching material, assessment content, verbal discussion, chat contributions, questions, comments, presentations, screen sharing and other teaching, learning and assessment activities.

Recording	means any audio, visual, audiovisual, digital or automated capture of live course content, including screen capture, transcription, captioning, automated notes, AI-generated notes, summaries or other processing of live course content. It does not include personal handwritten or typed study notes made by a student for their own use, unless those notes are generated, captured, stored or processed using an AI-enabled capture tool or other unauthorised system.
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Policy Statement

This policy sets out Kaplan's position on the recording, transcription, automated capture, storage, access, use and sharing of live course content for teaching, learning, assessment and student access purposes.

Kaplan may record, transcribe, caption, automatically capture, store and use live course content through Kaplan-authorised platforms and tools in accordance with the *Privacy Policy* and this policy.

Recording, transcription, automated capture and other processing of live course content may affect privacy, confidentiality, intellectual property and information shared by participants. Accordingly, such activities may only occur through authorised arrangements and in accordance with this policy.

Students must not independently record, transcribe, capture, summarise, upload, share or otherwise process live course content or captured class content unless authorised by Kaplan.

Policy Principles

Copyright Ownership of Teaching and Course Materials

All teaching and course materials created by Kaplan employees or contractors during their engagement ('Kaplan Content') are owned or licensed by Kaplan. To the extent that Kaplan Content is incorporated into a recording of a class or other live communication, the intellectual property rights in that Kaplan Content remain owned or licensed by Kaplan.

Kaplan may pause, stop, edit or exclude the recording, transcription, captioning or capture of any material where this is required to manage copyright, privacy, confidentiality, cultural sensitivity, guest presenter consent, technical quality or any other teaching and learning requirements.

Kaplan gives students a limited licence to use the Kaplan Content for their own use only. Students must not upload, disclose, copy, distribute, publish, sell, transfer, adapt or otherwise make available Kaplan teaching materials, course materials, Kaplan-authorised recordings, captured class content or live course content through external systems, file-sharing platforms, social media, AI-enabled tools or any other unauthorised system unless Kaplan has authorised this in advance.

Permitted Use by Students

Students:

- may access Kaplan Content solely for personal study in a subject in which they are enrolled.
- may take personal handwritten or typed study notes from Kaplan Content.
- must only access, use and store Kaplan Content in accordance with this policy, Kaplan's directions, and any conditions of access notified to students.

Prohibited Use by Students

Students:

- must not independently record, transcribe, capture, summarise, upload, share or otherwise process live course content, Kaplan-authorised recordings or captured class content unless authorised by Kaplan.
- must not use AI-enabled capture tools to record, transcribe, summarise, analyse, monitor, join, capture or otherwise process a class, live course content, Kaplan-authorised recordings or captured class content unless authorised by Kaplan.
- must not copy, distribute, publish, upload, share, sell, transfer, adapt or otherwise make available any part of a recording, transcript, caption, automated note, AI-generated note, summary or other captured class content unless authorised by Kaplan.

Recording of Class Delivery

Kaplan recognises that recording, transcription, captioning and other authorised forms of capture of classes may provide alternative or additional study resources that support flexible and accessible learning and enrich the student experience.

To facilitate this, Kaplan:

- may use Kaplan-authorised recording, transcription, captioning or other capture platforms for online, hybrid, face-to-face or other authorised class delivery.
- may update or change authorised recording, transcription, captioning or capture platforms over time and will notify students where relevant of any material changes.
- will inform students when a class is being recorded, transcribed, captioned, automatically captured or otherwise processed using a Kaplan-authorised platform or tool.
- requires Kaplan-authorised recordings and captured class content to be created, stored, accessed and used only through Kaplan-authorised platforms and in accordance with this policy.

Student recording, transcription, automated capture or other processing of live course content is addressed under the *Student Recording of Classes* section of this policy.

Access and Equity

Kaplan acknowledges that recording, transcription, captioning or other assistive technology may be necessary to support access and equity, including where required as part of an approved reasonable adjustment or support arrangement.

Where a student requires such support, Kaplan will determine the appropriate authorised tool, conditions of use and privacy safeguards, and communicate this authorisation directly to the student.

Approval to use an accessibility or assistive technology tool does not authorise the student to record, transcribe, upload, share or otherwise process live course content beyond the conditions authorised by Kaplan.

Quality of Recordings

While Kaplan strives to produce high-quality recordings, transcripts, captions, AI-generated summaries and other authorised outputs, technical limitations and practical factors may affect quality and accuracy.

Accuracy cannot be guaranteed, and students remain responsible for engaging with the relevant learning materials, attending and participating in classes where required, and seeking clarification where needed.

Kaplan-authorised recording and captured class content are intended to support learning and should not be relied on as a complete substitute for attendance, participation, engagement or independent study.

Guiding Procedures

Student Recording of Classes

Recording, transcription, automated capture or other processing of classes by students is generally not permitted. This includes recording, transcribing, summarising or otherwise capturing a class on behalf of absent classmates.

Students seeking permission to record or otherwise capture a class must obtain authorisation from Kaplan in advance, except where an alternative process applies under an approved reasonable adjustment or support arrangement.

Students may request permission to record or otherwise capture a class for reasons such as disability, physical impairment, learning difficulty, approved reasonable adjustment or learning enrichment. Requests must be submitted to Kaplan before the class begins.

Permission will only be granted subject to conditions set by Kaplan in writing. These may include:

- recording or capturing only the class presenter or other authorised content;
- not recording, capturing, identifying or sharing content relating to other participants;
- not uploading, sharing, distributing or otherwise making the material available to any external platform, AI tool or other unauthorised system;

- storing the material securely and protecting it from unauthorised access;
- deleting the material when it is no longer required, including at the completion of the subject or earlier if directed by Kaplan; and
- complying with any additional privacy, confidentiality, copyright, accessibility or other conditions specified by Kaplan.

Guest Presenters

Guest presenters must be informed in advance, and their written consent must be obtained, before their presentation is recorded, transcribed, automatically captured, summarised or otherwise processed.

If consent is not granted, recording, transcription, automated capture or processing must not proceed and must be paused or stopped during the guest presenter's segment.

Written consent must be retained in accordance with Kaplan's recordkeeping requirements.

Data Retention

Recordings may be archived for use in future study periods via Kaplan-authorised platforms, including the learning management system or other authorised content management systems. The archival of recordings is limited to the future study periods for which they remain aligned with their original educational purpose and consistent with applicable privacy, consent, copyright and retention requirements.

Transcripts, captions, AI-generated notes, summaries and other outputs generated from class recordings or live course content are records and must be managed in accordance with Kaplan's authorised systems, privacy requirements and the *Data Retention and Destruction Policy*. Staff must not store recordings, transcripts, summaries or automated outputs in personal accounts, personal devices or unauthorised third-party platforms.

For recordings featuring a guest presenter, the staff member responsible for engaging them must provide the guest with access to the recording (via link or file) upon request for their personal review.

Recording Permission and Participant Choices

Kaplan may record, transcribe, caption or otherwise capture classes using Kaplan-authorised platforms or tools in accordance with this policy. Students will be informed where a class is being recorded or otherwise captured.

Where practical and appropriate, students may minimise their visual or audio participation in the recording by keeping their camera off and remaining on mute. Students should be aware that participation via chat may still be captured where chat content forms part of the class record.

Where a student raises a concern about being captured in an authorised recording, Kaplan will, where reasonably practicable, consider appropriate measures to minimise unnecessary capture while maintaining the educational purpose of the activity.

Students must not independently record, transcribe, capture, summarise, upload, share or otherwise process live course content or captured class content unless authorised by Kaplan.

Kaplan-authorised recordings and captured class content may only be used for the purpose for which they were collected, unless another use is authorised by Kaplan and managed in accordance with applicable privacy, consent, copyright and records requirements.

Privacy Statement

Recorded, transcribed or automatically captured classes may include personal information, including student names, images, voices, chat contributions, questions, comments, participation data and other information shared during a class.

Such information must only be collected, stored, accessed, used, disclosed or otherwise processed through Kaplan-authorised platforms and in accordance with the Kaplan *Privacy Policy*.

For details about accessing or correcting personal information, or for guidance on making a privacy complaint, students should refer to the Kaplan *Privacy Policy*.

Breaches of this Policy

A breach of this policy may be managed in accordance with applicable Kaplan policies, procedures and enrolment terms and conditions including the *Integrity and Misconduct Policy*, the *Digital Use and Conduct Policy*, and the *Grievances, Complaints and Appeals Policy*.

Kaplan may require unauthorised recordings, transcripts, captions, AI-generated notes, summaries or other captured class content to be deleted, removed from external platforms, returned to Kaplan, or otherwise secured. Kaplan may also require a student to provide reasonable evidence this has occurred.

Serious, repeated or deliberate student breaches may result in action under applicable Kaplan policies and procedures and enrolment terms and conditions, including the *Integrity and Misconduct Policy* and the *Digital Use and Conduct Policy*.

Where required or permitted by law, Kaplan may refer a matter to an appropriate external authority.

Relevant Legislation

As a registered education provider, Kaplan operates under a range of legislative and regulatory requirements. Policies and procedures are in place to support compliance with the instruments referenced below:

- Copyright Act 1968 (Cth)
- Disability Discrimination Act 1992 (Cth)
- Disability Standards for Education 2005
- Education Services for Overseas Students Act 2000 (ESOS Act)
- ELICOS Standards 2018
- Higher Education Standards Framework (Threshold Standards) 2021
- National Code of Practice for Providers of Education and Training to Overseas Students 2018
- National Vocational Education and Training Regulator Act 2011
- National Vocational Education and Training Regulator (Outcome Standards for Registered Training Organisations) Instrument 2025
- Privacy Act 1988 (Cth)
- Telecommunications (Interception and Access) Act 1979
- Tertiary Education Quality and Standards Agency Act 2011 (TEQSA Act)

Related Policies and Documents

This policy should be read in conjunction with the following policies and documents:

- Assessment Policy
- Copyright Policy
- Data Retention and Destruction Policy
- Enrolment Terms and Conditions
- Equity and Inclusion Policy
- Digital Use and Conduct Policy
- Grievances, Complaints and Appeals Policy
- Integrity and Misconduct Policy
- Privacy Policy
- Reasonable Adjustment Policy
- Student Code of Conduct

Version Control and Accountable Officers

The Responsible Officer and Implementation Officers are jointly responsible for overseeing compliance with this policy.

Policy Category	Academic			
Responsible Officer	Vice President Academic			
Implementation Officers	Academic Deans or equivalent			
Review Date	September 2029			
Endorsed by:		Approved by:		
Vice President Academic & General Counsel		KBS & KHE Academic Boards		
Version	Authored by	Brief Description of the changes	Date Approved	Effective Date
1.1	Quality Regulations and Standards Team	Removal of references to MIT	N/A	13.07.2021
2.0	Quality Regulations and Standards Team	Refresh of policy, no material changes made.	20.03.2025	20.03.2025
3.0	Quality Regulations and Standards Team	- Policy renamed from Online Content Recording, Storage and Use Policy to Recording, Storage and Use Policy. - Comprehensive review and rewrite. - Scope expanded to include assessment activities and modern recording technologies. - Introduced controls relating to AI-enabled capture tools, transcription, automated summarisation, privacy, consent, accessibility, data retention and authorised use of live course content and captured class content. - Updated definitions, responsibilities and procedures to improve clarity, consistency and alignment with related Kaplan policies.	17.09.2026	28.09.2026