

Digital Use and Conduct Policy

Scope

This policy applies to the use of Kaplan digital systems, platforms, communication tools and artificial intelligence (AI) in connection with Kaplan activities, networks, services and information.

This policy applies to Kaplan students.

Staff and contractor use of Kaplan IT systems, services and information is governed by the *Acceptable Use of IT Policy* and related information security, privacy and cybersecurity requirements.

Purpose

This policy establishes requirements for:

- the responsible, ethical and secure use of digital systems, platforms, communication tools and AI technologies
- acceptable online conduct
- use of artificial intelligence (AI); and
- protection of Kaplan information.

Definitions

Terms	Definitions
Artificial intelligence (AI)	means software, systems or tools that use artificial intelligence or automated technologies to generate, modify, analyse, translate, summarise, transcribe, classify, predict, recommend, solve, code, create or otherwise process content, data, information or communications. This includes Generative AI (Gen AI) tools, chatbots, translation tools, paraphrasing tools, coding assistants, transcription tools, AI notetakers, meeting assistants, bots, agents and automated summarisation tools.
Cybersecurity	means processes and technologies implemented by Kaplan to protect data, networks, and users from unauthorised access, misuse, or disruption.
Digital systems, platforms and communication tools	means all digital systems, platforms, applications and technologies used to create, access, store, process, communicate or share information in connection with Kaplan activities. This includes, but is not limited to, email, messaging platforms, discussion forums, social media, video conferencing, learning management systems, collaboration tools, cloud storage systems, internet services, AI technologies and similar digital tools used by Kaplan or members of the Kaplan community. This term replaces the previous reference to electronic media.
Kaplan	means Kaplan Australia Pty Ltd, Kaplan Business School Pty Ltd, Kaplan Higher Education Pty Ltd and Kaplan Education Pty Ltd, including their schools and colleges in Australia. Kaplan International NZ Limited, including its schools and colleges in New Zealand.
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.
Social media	means digital platforms that enable the creation, sharing, or exchange of user-generated content, such as Facebook, LinkedIn, Instagram, X (formerly Twitter), TikTok, YouTube, and similar online communities.

Guiding Principles

Use of Kaplan digital systems, platforms, communication tools and AI technologies must reflect Kaplan's commitment to integrity, respect, privacy, security and responsible conduct. All users are expected to exercise appropriate judgement and accountability when engaging online and remain responsible for the accuracy, integrity and appropriateness of any content they create, use or share, including content created using artificial intelligence (AI).

Kaplan digital systems, platforms and communication tools should be used to support learning, communication, collaboration and engagement in a respectful and professional manner. Users must act in accordance with applicable legislation and relevant Kaplan policies, including applicable codes of conduct, the *Integrity and Misconduct Policy* and the *Prevention of Harassment and Bullying Policy*.

Legal and Ethical Obligations

Users are personally responsible for the content they create, post or share online. They must not publish or distribute material that is defamatory, discriminatory, offensive, obscene or unlawful. This includes breaches of copyright, privacy or confidentiality.

Users must not represent or misrepresent Kaplan, impersonate others or engage in harassment, bullying, intimidation or other conduct that is inconsistent with applicable legislation or Kaplan policies. Users remain responsible for decisions made, actions taken and content created, used or shared using AI.

Kaplan may monitor the use of its systems to support compliance with this policy and protect the safety and wellbeing of the Kaplan community. Any monitoring will be conducted in accordance with applicable privacy and surveillance legislation, the *Privacy Policy*, and in relation to staff the Information Security Management System (ISMS) policies (including the *IT Acceptable Use Policy*). Kaplan may take appropriate action, including removing content or restricting access, where content or behaviour is inconsistent with this policy or applicable legislation.

Student Use of Artificial Intelligence Tools

Students must use artificial intelligence (AI) responsibly and in accordance with Kaplan policies, privacy obligations, cybersecurity requirements and any assessment instructions.

Students must not upload, disclose, process or share confidential Kaplan information, personal information, assessment materials (including assessment questions and answers) or other restricted information through external AI unless authorised by Kaplan.

Kaplan may provide Kaplan-authorised AI tools, including chatbots and virtual assistants, to support learning, student engagement and access to information.

Information generated by AI should be independently verified before it is relied upon or shared. Students remain responsible for ensuring that information used for learning or assessment is accurate and consistent with official Kaplan learning materials, assessment instructions and advice provided by Kaplan.

Student use of Kaplan-authorised AI may be monitored, reviewed and retained by Kaplan for quality assurance, service improvement, student support, safety, compliance and misconduct investigation purposes in accordance with applicable legislation and Kaplan policies.

Appropriate Online Conduct

When communicating via email, forums, chat, or other messaging platforms, users should apply the same level of professionalism and courtesy expected in formal written communication. Emails and messages must be concise, respectful, and relevant. Users must not send or forward inappropriate content or distribute Kaplan materials without authorisation. All electronic communication must comply with legislation governing defamation, privacy, and copyright.

Students must use Kaplan authorised communication channels for all matters relating to assessment, academic integrity or misconduct, complaints, appeals, their enrolment or other official student matters.

Students must not contact Kaplan staff directly through personal or professional social media accounts, email accounts, private messaging applications, websites or other non-Kaplan communication methods about these matters unless expressly invited or authorised by Kaplan.

Students may use Kaplan's internet services for study and other legitimate educational purposes, provided that such use is consistent with professional conduct.

Students must not use Kaplan systems, platforms, internet services or digital communication tools to:

- access, upload or download sexually explicit material;
- access, upload or download hate speech or offensive material;
- access, upload or download materials regarding illicit drugs, violence, criminal skills and/or illegal activities, including academic cheating services;
- engage in gambling and similar forms of gaming;
- download illegal music, movies, games, or unauthorised software; or
- download or view graphic content that may be distressing or disturbing to members of the Kaplan community.

Kaplan has a zero-tolerance approach to the above listed activities.

Users must not

- impersonate or falsely represent another person;
- share any account details or passwords with anyone;
- disclose confidential financial information without authorisation;
- have any private information publicly visible without an appropriate reason;
- use social media to bully, harass, abuse, threaten or intimidate others;
- make defamatory comments or publish misleading, malicious or untrue information;
- use obscene or offensive language towards others;
- post content that is pornographic or incites violence against others;
- record, capture, transcribe, distribute or otherwise use content in a manner that is inconsistent with the Recording, Storage and Use Policy or other applicable Kaplan requirements;
- use AI to impersonate, deceive, misrepresent or create misleading, deceptive or fabricated information relating to Kaplan or another person; or
- use electronic or digital communication to pressure, influence, intimidate or improperly contact a person involved in an investigation, determination, complaint, appeal or other formal Kaplan process.

Supporting Procedures

When using Kaplan digital systems, platforms, communication tools or online services:

- be considerate to others and avoid activities on social media and online platforms that could be considered unlawful, including threatening, abusive, harassing, maliciously false, vulgar, obscene, sexually explicit or hateful statements or activities.
- do not create, post, share or endorse content that is racist, racially vilifying, discriminatory, harassing or otherwise targets a person or group on the basis of race, ethnicity, skin colour, national origin, religion, gender, gender identity, sexual orientation, age, disability or another personal characteristic.
- respect the dignity and privacy of all members of the Kaplan community when communicating online.
- behave in an ethical manner.
- observe the relevant age restrictions for social media platforms. Where required, students under 18 must have the necessary parent/legal guardian permissions in place before using social media in connection with Kaplan activities.
- always use appropriate language.
- remember that information shared online may be copied, altered or redistributed by others.
- keep your personal information secure.

Cybersecurity

Each user is provided with secure login credentials to access Kaplan systems. These credentials are personal and must not be shared with others.

Users must log out of shared or public devices after use and take reasonable steps to protect their personal information.

Kaplan implements cybersecurity measures including monitoring and content filtering to protect its systems, users and information. Users are expected to cooperate with these measures and report any suspicious or unauthorised activity promptly.

Breaches of this Policy

Failure to comply with this policy may result in action in accordance with applicable Kaplan policies, procedures, contractual arrangements and enrolment terms and conditions.

Depending on the nature and seriousness of the breach, this may include formal warnings, suspension, expulsion, termination of employment, restriction of access to Kaplan systems or other appropriate action.

Serious repeated or deliberate breaches, or breaches involving unlawful conduct, may be referred to the General Counsel or relevant authorities where appropriate. Kaplan will determine the appropriate response in accordance with applicable legislation, policies and governance requirements.

Complaints and Appeals

Grievances, complaints or appeals relating to matters arising under this policy will be managed in accordance with the *Grievances, Complaints and Appeals Policy* and any other applicable Kaplan policies, procedures or contractual arrangements.

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:

- Broadcasting Services Act 1992 (Cth)
- Copyright Act 1968 (Cth)
- Education Services for Overseas Students Act 2000 (Cth)
- Higher Education Standards Framework (Threshold Standards) 2021
- National Code of Practice for Providers of Education and Training to Overseas Students 2018
- Online Safety Act 2021 (Cth)
- Privacy Act 1988 (Cth)
- Telecommunications (Interception and Access) Act 1979 (Cth)
- Tertiary Education Quality and Standards Agency Act 2011 (TEQSA Act)

Related Policies

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

- Assessment Policy
- Copyright Policy
- Equity and Inclusion Policy
- Grievances, Complaints and Appeals Policy
- Integrity and Misconduct Policy
- Prevention of Harassment and Bullying Policy
- Privacy Policy
- Recording, Storage and Use Policy
- Sexual Misconduct Prevention and Response Policy

Version Control and Accountable Officers

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

Policy Category	Legal			
Responsible Officer	General Counsel			
Implementation Officer	Kaplan Executive			
Review Date	September 2029			
Endorsed by:		Approved by:		
KBS Academic Board & KHE Academic Board		General Counsel		
Version	Authored by	Brief Description of the changes	Date Approved:	Effective Date:
1.1	Quality, Regulations and Standards Team	- Updated references to other policies. - Added online learning and communication platforms. - Updated template.	01.05.2021	05.05.2021
1.2	Quality, Regulations and Standards Team	Refresh of policy	02.12.2025	08.12.2025
2.0	Quality, Regulations and Standards Team	- Renamed the policy as the Digital Use and Conduct Policy and updated terminology for digital, cybersecurity and AI use. - Expanded scope and definitions to include digital platforms, communication tools and AI. - Updated requirements for online conduct, privacy, information protection and digital communications. - Strengthened anti-discrimination and harassment provisions to align with amended HESF requirements.	17.09.2026	22.09.2026