

## **Student Record Management Policy**

Kaplan Higher Education Pty Ltd  
Kaplan Education Pty Ltd





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## Scope

This policy is applicable to Kaplan Education Pty Ltd and Kaplan Higher Education Pty Ltd, trading as Kaplan Professional and Kaplan Professional Education respectively (Kaplan).

## Overview

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. Generally, personal information will not be made available to a third party without the written authority of the individual concerned, unless it is legally required or as 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, they should contact our Privacy Officer at [privacy@kaplan.edu.au](mailto:privacy@kaplan.edu.au).

## Administration and records management

Kaplan takes all reasonable steps to protect the security of the personal information that it holds and maintain the accuracy and relevance of the data it holds. This includes appropriate measures to protect electronic materials and materials stored and generated in hard copy.

During the learning participation lifecycle, all student records (except assessment records) are updated at least every six (6) months by Kaplan based on information provided by students.

During the duration of their studies, students have access to submit updated personal information to Kaplan via their student portal.

Where 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 personal information by a secure means.

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

## Retention of records

Kaplan retains records for the period(s) set out in Attachment A — Retention Periods of this policy.

Students should note that assessments submitted to Kaplan through Kaplan's learning management system may not be accessible through the system after submission. Assessments submitted as part of Kaplan's higher education courses will be administered via Turnitin.

Evidence collected for the process of Recognition of Prior Learning (RPL), marking guide(s), assessment criteria together with the assessment items (for example a report, exam, essay, and case study) may be retained either in hard copy or electronically. Where it is not possible to maintain an assessment item (such as a piece of art work), then evidence of the assessment item having been completed will be retained (such as a photograph of the art work).

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## Learner access to records

Current and past learners may view records of enrolment, financial status, course/module/unit progress by applying in writing to the relevant Kaplan Student Services team. An administration fee may apply.

## Back up of electronic records

All electronic records are backed up daily.

## Student record protection

In the event that Kaplan ceases to operate, arrangements will be made for access to current student records including:

- Certification documentation for each qualification completed
- For students who have not completed their qualification, a statement of attainment for any units of competence or modules completed
- Any training and assessment activities undertaken that were only in partial fulfilment of a unit of competence or module.

Students that continue their studies with another provider may have their records transferred to their new provider with their written consent.

Otherwise, for higher education courses — arrangements for records to be held by an authorised representative organisation on behalf of Kaplan (such as a new provider) and for vocational education courses — student records will be transferred electronically to the national vocational education and training regulator Australian Skills Quality Authority (ASQA).

## Reporting to the national education regulators

### AVETMISS reporting

We are required to collect AVETMISS-compliant records for students, and for all competency enrolments and outcomes achieved. This data will be reported to the National Centre Vocational Education Research (NCVER) according to the reporting requirements specified in the Data Provision Requirements 2012. We meet this requirement by maintaining AVETMISS-compliant records in Kaplan's Student Management System (SMS) and Learner Management System (LMS).

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## Quality indicator reporting

We are required to report Quality Indicator data to ASQA in accordance with scheduled reporting dates. This requirement is specified in the Data Provision Requirements 2012 and explained further under Quality Indicator Reporting on the ASQA website [www.asqa.gov.au](http://www.asqa.gov.au). Data is collated and analysed using the survey instruments, a report is produced and submitted to ASQA between the period 1 January to 30 June each year and will relate to the learner engagement and employer satisfaction QI survey response rates and improvement actions identified for the previous calendar year.

## HEIMS reporting

We are required to report student, course and other relation information to the Department of Education and Training (via their HEIMS portal) in accordance with the scheduled reporting dates. The Higher Education Student Data Collection includes:

- courses and student information that relate to all units of study with census dates from 1 January to 31 December of the reporting year
- information about students who are in receipt of an FEE-HELP loan from 1 January to 31 December of the reporting year
- information about students who commence or continue a Commonwealth Scholarship in the reporting year.

## PRISMS

We are required to report student data in accordance with the *Education Services for Overseas Students (ESOS) Act 2000*.

## Version control and accountable officers

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

<b>Policy category</b>	Academic			
<b>Responsible Officer</b>	Vice President, Academic			
<b>Implementation Officer</b>	Head of Operations			
<b>Review date</b>	May 2019			
<b>Approved by</b>				
Vice President, Academic under a standing delegation from Academic Board.				
Version	Authored by	Brief description of the changes	Date approved	Effective date
1.0	Quality & Standards Group	Unpacking of one document into existing document	01-01-2014	01-01-2014
2.0	Quality & Standards Group	Reviewed data retention obligations to ensure alignment with current practice and the updates to the Privacy Act — March 2014. Updated the policy to have a common format, VP title	03-10-2014	03-10-2014
2.1	Quality & Standards Group	Format and wording changes to align across all businesses	10-04-2015	10-04-2015
2.2	Academic Quality and Governance Team	Clarified policy scope covers Vocational Education and Training operations under Kaplan Education Pty Ltd and introduced an Implementation Officer to the Policy. Hyperlinks introduced to facilitate useability	26-05-2016	16-06-2016
2.3	Quality, Regulations and Standards Team	Updated to include regulator reporting requirements and reflect National Code 2018 reporting requirements Some refinement of wording to aid clarity	04-09-2018	10-09-2018



## Attachment A — Retention Periods

Documents retained	Minimum retention period(s)
Records of all students, including: <ul style="list-style-type: none"><li>• Current residential address</li><li>• Mobile phone number (if any)</li><li>• Email address (if any)</li><li>• Amount of money paid to Kaplan</li><li>• Duration of course paid for</li><li>• Amounts owing to Kaplan</li><li>• Written agreements between the student and Kaplan</li><li>• Amount that will be charged for the student to access their records</li><li>• Up-to-date records of assessment.</li></ul>	Until two (2) years after the person ceases to be a student
Examinations and assessments	Twelve (12) months from the date on which the grade decision was made (unless relating to a complaint or appeal — see below)
Student complaints and appeals records	Five (5) years from the date the complaint or appeal was lodged
FEE-HELP and VET FEE-HELP application documentation	Seven (7) years
Records required for legal action	Retained until the completion of that legal action, includes appeals
<b>Overseas student records</b>	
<ul style="list-style-type: none"><li>• Details of accepted students, including:<ul style="list-style-type: none"><li>• Name and gender</li><li>• Name, start date and expected duration of the student's course at Kaplan</li><li>• Date of birth, country of birth and nationality</li><li>• Details of person who has legal authority to act on the student's behalf (if the student is under 18 years old)</li><li>• Course and location</li><li>• Agreed start date of the student's course at Kaplan.</li><li>• Day when the student is expected to complete their course at Kaplan</li></ul></li></ul>	Until the information is entered into PRISMS — within 14 days of the student being accepted into their course at Kaplan (unless retained for two (2) years above — such as through the written student agreement)

<ul style="list-style-type: none"> <li>• Amount of tuition and non-tuition fees received before confirming the student's enrolment using PRISMS</li> <li>• Total tuition fees required to be paid to undertake full course</li> <li>• Whether premiums have been paid for student health insurance before the course commences</li> <li>• If the student has undertaken a test to determine their English competency, the name of the test and the course taken, and the score</li> <li>• The location of the Australian government immigration office where the student's visa application was lodged</li> <li>• The student's passport number</li> <li>• If the student holds a visa, the visa number.</li> </ul>	
<ul style="list-style-type: none"> <li>• Provider transfer requests</li> <li>• Variation in enrolment load that may affect students' duration of study</li> <li>• Course progress</li> <li>• Attendance</li> <li>• Course credit</li> <li>• Applications for deferment or suspension</li> <li>• A written record of any critical incident and remedial action taken.</li> </ul>	<p>Until two (2) years after the person ceases to be a student</p>



<b>Higher Education Provider Records</b>	
Certification documentation, including: <ul style="list-style-type: none"> <li>• A testamur</li> <li>• Records of results or statement of attainment, which may also include an Australian Higher Education Graduation Statement</li> </ul>	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 (if required)
<b>Vocational Education Provider Records</b>	
Vocational education records, which cover: <ul style="list-style-type: none"> <li>• Attainment of units of competency</li> <li>• Qualifications</li> </ul>	30 years
Learning participation records	Until the student has completed their training
Fee information for each student, including: <ul style="list-style-type: none"> <li>• The total amount of fees</li> <li>• Payment terms</li> <li>• Any non-refundable deposit or administration fee</li> <li>• The nature of the guarantee given by the RTO to complete the training and/or assessment once the student has commenced study in their chosen qualification or course</li> <li>• Fees and charges for additional services</li> <li>• The organisation's refund policy</li> </ul>	Until the student has completed their course or training
RTO registration information, including: <ul style="list-style-type: none"> <li>• AQTF Policies &amp; Procedures</li> <li>• Training delivery and assessment strategies</li> <li>• Assessment policies</li> <li>• Assessment tools/instruments</li> <li>• RPL assessment records</li> <li>• Complaints, grievances and appeal records</li> </ul>	For the duration of the current RTO registration period (five years) for audit purposes



<p>Electronic records provided to ASQA (in the event of Kaplan ceasing to operate) include the student's:</p> <ul style="list-style-type: none"><li>• full name</li><li>• residential post code</li><li>• date of birth</li><li>• student ID number (if issued)</li><li>• enrolment and commencement dates</li><li>• code and title of qualification, course or program the student was enrolled in</li><li>• codes and titles of units of competency completed and results (if applicable)</li><li>• date the Certificate or Statement of Attainment was issued to the student</li></ul>	<p>Submitted to ASQA within 30 days of registration expiring or ceasing operation (or such other time period set in accordance with the <i>National Vocational Education and Training Regulator Act 2011</i>)</p>
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