

Program and Subject Development and Review Policy

Scope

This policy applies to all Kaplan Higher Education Pty Ltd, (KHE) pathway colleges (College). It applies to Program and Subject Development, evaluation and Review.

Purpose

This policy outlines the required standards to be met when developing and reviewing all Award and Non-Award Programs and Subjects delivered by KHE Colleges. The Development and Review process is guided by the Higher Education Standards Framework 2021 (Threshold Standards), the Education Services for Overseas Students (Foundation Program Standards) 2021 Instrument, the English Language Intensive Courses for Overseas Students (ELICOS) Standards 2018 and the Tertiary Education Quality and Standards Agency (TEQSA) Guidance Notes.

The objective of the Development and Review process is to manage the quality and continuous improvement of KHE's Program offerings so that they:

- meet professional, regulatory and legislative requirements.
- are delivered at the appropriate levels.
- are consistent with current employment outcomes.
- are aligned with good academic practice with improvements documented and actioned.

Definitions

AQF levels	means the criteria required to demonstrate the achievement of a Qualification as per the Australian Qualifications Framework (AQF). For example, Level 5 = diploma, Level 7 = bachelor's degree, Level 9 = master's degree.
Award Program	means Programs that are AQF Qualifications, specifically diplomas, associate degrees, bachelor's degrees, graduate certificates, graduate diplomas or master's degrees.
Development	means the design and creation of new Programs and/or Subjects.
Moderation	means a quality control process in ELICOS Programs by a panel of internal and/or external professionals which normally includes ELICOS managers and teachers. The panel reviews and checks for consistency and/or inconsistencies in the assessment decisions and methods used between different assessors in respect to relevant Program curriculum of the same Program Subjects.
Non-Award Program	means Programs that are not AQF Qualifications. Examples of Non-Award Programs include ELICOS Programs, Foundation Studies Programs, Degree Transfer Programs and Pre-Master's Programs.
Program	means a structured combination of Subjects required to achieve defined learning outcomes. Depending on the provider, a Program may also be referred to as a <i>course</i> .
Program Management Documentation	means the Program documentation which outlines information about how Programs will be delivered and managed, such as the Program rationale and analysis, Program learning outcomes, associated mapping to the Subject learning outcomes and assessments, relationship with the graduate attributes, the underpinning Program content, Program structure, Subject outlines, assessment information and Program-related transition arrangements and/or implementation reports.

Qualification	means a certification or formal recognition of learning achieved through the successful completion of both Award and Non-Award Programs.
Review	means the formal evaluation and assessment of an existing Subject and/or Program taking into consideration feedback from stakeholders inclusive of employers, staff and students, and informed by cohort-based analyses, academic data, benchmarking and contemporary knowledge regarding subject matter, pedagogies and assessment strategies.
Subject	means a separate Subject of study that combined with other Subjects, makes up a Program of study. Depending on the provider, a Subject may also be referred to as a <i>unit or course</i> .
Validation	means the quality review process in ELICOS Programs by a panel of internal and/or external professionals which normally includes ELICOS managers and teachers. The panel checks the assessment tools to ensure they meet the requirements of relevant curriculum aspects as well as the industry.

Policy Principles

This policy is guided by the following principles of Program and Subject Development and Review which aim to promote a consistent, evidence-based, and quality-assured approach across KHE. All Programs and Subjects should:

- meet regulatory requirements and standards including the Threshold Standards, AQF, Foundation Program Standards and the ELICOS Standards 2018.
- be developed and reviewed in a systematic approach which is a KHE wide, quality-assured, and collaborative approach that aligns student learning experiences, assessments and learning outcomes.
- include evaluation that encompasses external and/or internal benchmarking, student and staff feedback, and data on key metrics such as progression, retention, attrition and completion.
- identify any need to develop new materials or to revise existing ones.
- analyse market and industry trends.
- review the staffing-related requirements for each Subject or Program.
- identify any need for updated pedagogies and/or assessment strategies.
- be designed, where relevant, to include opportunities for work-integrated learning throughout Award Programs.
- offer students a range of learning opportunities including diverse experience and insights relevant to future employment.
- reflect principles of good and contemporary practice in design and Review.
- reflect best teaching and learning practices.
- align to relevant learning outcomes.
- align Programs to KHE's Graduate Attributes and be supported by appropriate academic, administrative, staffing, physical and technological resources.
- be aligned with the KHE Academic Strategy.
- meet relevant accreditation requirements including those of relevant industry and professional bodies.
- safeguard the security of student data when utilised for Program Reviews.
- share good practice more broadly across the sector.
- Maintain processes to monitor and support at-risk cohorts to enhance equitable access, engagement and success.
- identify and address issues of student wellbeing and safety.

Development Standards: Programs and Subjects

All KHE Program and Subject Development projects will:

- complete the applicable Program Management Documentation in full.
- be monitored regularly with records maintained to demonstrate KHE meets all regulatory obligations and professional accreditation requirements, as required.
- engage external academic and industry experts to review and provide feedback in relation to substantial Program level Development.

Subjects are the building blocks of Programs with the Program learning outcomes achieved by completing a defined number of Subjects at specified levels.

Program Approval and Development

The Course Advisory Committees (CAC) and Course Development Panels (CDP) will undertake their functions as outlined in the *Academic Quality and Governance Framework* available on the website.

The approval process encompasses numerous stages at which external members of the Academic Board are required to provide approval to advance the process from one stage to the next.

At the initial concept stage, the CAC convenes to review the business case and to determine whether the Program design can commence. The periodic requirement for the CAC's review and approval continues throughout each stage of the internal and external consultations and then culminates in the final stage with the CAC's endorsement that the entirety of the documentation for (re)accreditation that would ordinarily be required by TEQSA can now be submitted to the Academic Board for approval. The Academic Board's involvement then continues throughout the program development process during which they oversee the implementation of the project management plan via updates provided at every meeting of the Academic Board.

Subject Approval and Development

Where a single Subject is developed separately to the Program Development process, the following must occur:

- The Subject must be developed holistically with regard to the relevant Program learning outcomes, Graduate Attributes and Program structure(s).
- Each proposed Subject outline is reviewed and endorsed by the Teaching and Learning Committee (T&L) and approved by the Academic Board.
- The relevant Program Management Documentation is updated to reflect the proposed Subject's integration into the Program(s).
- Approval outcomes are recorded in the minutes of the Teaching and Learning Committee (T&L) and the Academic Board, with updated Program Management Documentation retained as a record of approval.

Review Standards: Programs and Subjects

The following standards will be applied when Reviewing Programs and Subjects:

- Changes to a Program or Subject during an accreditation period are monitored with records maintained by KHE to ensure regulatory obligations and professional accreditation requirements are met, as required.
- Program and/or Subject delivery data will be used to inform decisions and changes.
- KHE will develop, maintain and provide an annual Program Review schedule to the Academic Board.
- KHE will maintain a register of all Program and Subject changes.

Program Review

- All KHE accredited Programs are subject to a comprehensive Review during the Program accreditation period, overseen by peak academic governance processes.
- All comprehensive Program Reviews are conducted in accordance with the approved institutional Program Review Template, which includes provisions for external referencing and/or benchmarking,

thereby ensuring a consistent, transparent and evidence-based method of evaluation across all Programs.

- A comprehensive Review is led by the Director, Academic Strategy and Quality, overseen by the the CDP, and informed by an external and independent CAC consisting of academic experts and industry representatives. Staff and students may also be invited to provide feedback.
- The Review process encompasses analyses of the following elements:
 - design and content of each Program of study
 - the expected learning outcomes
 - methods for assessment of those outcomes
 - the extent of students' achievement of the learning outcomes
 - emerging developments in the field of education
 - any predicted changes to employer expectations
 - differences in modes of delivery and other cohort-based analyses
 - the changing needs of students
 - identified risks to the quality of the Program
 - national and international comparators
 - requirements of professional accreditation bodies
 - the performance of agents and, if relevant, other third parties
 - academic admissions criteria and minimum English entry requirements
 - learning and academic support
 - teaching quality, supervision and leadership
 - academic integrity and misconduct
- Comprehensive Reviews of Programs are informed and supported by regular interim monitoring of the quality of teaching, learning and assessment, student progress and the overall delivery of Subjects within the Program under Review.
- KHE Review and improvement activities include regular external referencing of the success of student cohorts against comparable Programs of study, including but not limited to:
 - analyses of progression rates, attrition rates, completion durations and rates and, where applicable, a comparison of the different locations of delivery
 - the assessment methods and grading of students' achievement of learning outcomes for selected Subjects within Programs
- Records of the Program Review process must be maintained by KHE, together with evidence such as the Program Management Documentation.

Subject Review

- KHE Subjects are reviewed at least every two years.
- Subject Review documentation is maintained by KHE and reported to the Teaching and Learning Committee (T&L).
- Where a single Subject is reviewed separately to the Program Review process, the Subject must be reviewed holistically with the relevant Program(s).

Findings and actions from Subject Reviews are entered into the Continuous Improvement Register and reported to T&L.

Validation and Moderation of Assessment: ELICOS Programs

Validation and Moderation are quality assurance processes applied to all ELICOS Programs to confirm the appropriateness of assessment tools (Validation) and the consistency of assessment judgements (Moderation). These processes are integral to maintaining integrity, comparability, and continuous improvement of assessment outcomes across all delivery locations and teachers.

Validation and Moderation sessions are conducted at least twice each year and additionally when:

- changes occur to ELICOS Program curricula;
- new ELICOS Programs are placed on scope; or
- concerns arise regarding assessment design or grading consistency.

The Director, Learning and Teaching and the Assistant Director, Learning and Teaching are jointly responsible for coordinating Validation and Moderation sessions, including the appointment of panel members, provision of documentation, and oversight of record-keeping. Panel members include internal ELICOS staff and may include external members with relevant expertise. All panel members must declare any potential conflicts of interest prior to participation.

Sampling of assessment tasks and student work is determined by cohort size, delivery mode, Program level, and identified risk factors. The sampling plan is documented for each session to demonstrate coverage and proportionality.

Panel members are provided with all relevant documentation at least one week prior to the session to support an informed and evidence-based discussion. Documentation includes, but is not limited to, the session agenda, Program curriculum, assessment tools, exemplars, and the Validation or Moderation Report Form.

Validation sessions focus on confirming that:

- assessment tools and rubrics are aligned with learning outcomes and skills detailed in the Program curriculum;
- assessment tasks are clear, appropriate, and current with industry and policy expectations;
- marking criteria and exemplars represent the required standard of achievement;
- proposed revisions are documented for continuous improvement; and
- when ELICOS Programs are provided under a direct entry arrangement to a higher education Program, measures will be taken to ensure that assessment outcomes are aligned to the other criteria used for admission to the higher education Program.

Moderation sessions focus on confirming that:

- assessment judgements are applied consistently across teachers and delivery sites;
- grading aligns with published criteria and exemplars;
- student work demonstrates achievement of the intended learning outcomes; and
- opportunities for professional calibration and feedback are identified.

Findings and recommendations from each Validation and Moderation session are summarised in the relevant report and tabled for review by the academic management team. Agreed improvement actions are recorded in the Program Validation and Moderation Register and monitored by the Director, Learning and Teaching until completion. Outcomes and progress are reported to the Director, Academic Strategy and Quality and, where relevant, shared with teaching staff to inform future assessment design and professional development.

Records of validation and moderation sessions, including supporting evidence, outcomes and actions, are retained for a minimum of five (5) years from the time they take place using the Program Validation/Moderation Register.

Relevant Legislation

As a registered education provider, the KHE operates under strict laws and regulations. Policies and procedures are in place to ensure compliance with the legislative instruments referenced below:

- Australian Privacy Principles
- Australian Qualifications Framework
- Disability Standards for Education 2005
- Education Services for Overseas Students Act 2000 (ESOS Act)
- Education Services for Overseas Students (Foundation Program Standards) Instrument 2021
- Education Services for Overseas Students Regulations 2019
- ELICOS Standards 2018
- Higher Education Standards Framework (Threshold Standards) 2021
- National Code of Practice for Providers of Education and Training to Overseas Students 2018
- Privacy Act 1988 (Cth)
- Tertiary Education Quality and Standards Agency Act 2011 (TEQSA Act)

Related Policies and Documents

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

- Academic Integrity and Misconduct Policy
- Academic Success Policy
- Academic Quality and Governance Framework
- Assessment Policy
- Benchmarking Policy
- Continuous Improvement Policy
- Program Validation/Moderation Schedule
- Diversity, Inclusion and Equity Policy
- Graduate Attributes Policy
- Learning Facilities and Resources Policy
- Student Record Management Policy

Version Control and Accountable Officers

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

Policy Category	Academic			
Responsible Officer	Vice President, Academic			
Implementation Officer	Director, Academic Strategy and Quality			
Review Date	December 2028			
Approved by				
KHE Academic Board				
Version	Authored by	Brief Description of the changes	Date Approved	Effective Date
1.0	Quality, Regulations and Standards team	New Policy. Policy re-branded for new KHE college. Minor wording and formatting changes.	10.07.2025	11.07.2025
2.0	Quality, Regulations and Standards team	Policy re-written to consolidate all KHE pathway colleges under KHE governance. Re-branded from college-level to KHE-wide policy with unified structure and terminology. Updated governance and approval pathways to reflect KHE Academic Board oversight. Expanded and modernised policy principles, including equity, wellbeing and data security. Re-structured Program and Subject Review framework with clearer roles, templates and evidence requirements. Comprehensive rewrite of ELICOS Validation and Moderation processes with new responsibilities and record-keeping standards. Updated references to current legislation.	02.08.2025	08.12.2025