

## **Under 18 Policy**

**Kaplan Higher Education Pty Ltd.  
Kaplan Education Pty Ltd.**

Kaplan Higher Education Pty Ltd. ABN 85 124 217 670, trading as Kaplan Professional.  
Registered as a Higher Education Provider PRV12030.

Kaplan Education Pty Ltd. ABN 54 089 002 371, trading as Kaplan Professional.  
Registered as a Registered Training Organisation RTO No. 90116





## Scope

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

Specifically, this policy applies to:

- current and future students who are under the age of 18 before or at the time of application, and continuing until they reach the age of 18
- employees and contractors of Kaplan
- Kaplan offices
- face-to-face contact including but not limited to work placements, events, client meetings, social gatherings and cultural activities
- all virtual spaces such as online forums, webinars, workshops, platforms, learning management systems, social media and communities arranged or facilitated by Kaplan third parties providing any services to Kaplan.

## Purpose

The purpose of this policy is to:

- ensure appropriate arrangements are made to protect the personal safety and social wellbeing of domestic students and international students in accordance with commonwealth, state and territory legislation relating to child welfare and protection.
- provide guidance when making decisions concerning students who are under the age of 18.
- outline specific welfare requirements for Under 18s where Kaplan:
  - delivers training and assessment within Australia
  - is registered as a Higher Education provider
  - is registered as a Registered Training Organisation
  - provides non-accredited courses
  - organises work placements in industry
  - provides Continuing Professional Development (CPD)
  - is not a registered CRICOS provider
  - does not organise accommodation for students.

## Policy Statement

The child welfare and protection legislation in Australia applies to young people and children who are students under the age of 18. The minimum age permitted for an Under 18 enrolment at Kaplan Professional is 16 years of age.



## Definitions

The following terms and definitions are applicable to this Policy.

|                                    |                                                                                                                                                                                                                                                                                                                       |
|------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Child Safe Standards</b>        | The application of the National Principles for Child Safe Organisation in state and territory legislation.                                                                                                                                                                                                            |
| <b>Direct contact</b>              | The screening clearance requirements vary between the states and territories. Victoria has the most prescriptive definition for 'direct contact' with under 18s, being face-to-face, physical, written, oral or electronic. As Kaplan Professional is a national provider, the Victorian definition has been adopted. |
| <b>Enrolment of Under 18s</b>      | The point at which the Under 18 student enrolls in their course and their admission is signed by their parent(s) or guardian(s).                                                                                                                                                                                      |
| <b>Face-to-face delivery</b>       | An instructional method where course content and learning material are facilitated in person with a group of students.                                                                                                                                                                                                |
| <b>Mandatory reporting</b>         | State and Territory legislation defines specific groups of people for whom it is mandatory to report the abuse or neglect of children and young people to government authorities.                                                                                                                                     |
| <b>Minors</b>                      | Term used in legislation for students who are under the age of 16 at the time of application and/or during part or all of their course of study. Also known as Under 18s.                                                                                                                                             |
| <b>National Principles</b>         | The National Principles for Child Safe Organisations is a nationally recognised framework for the welfare and safety of Under 18s; affirmed by all levels of government.                                                                                                                                              |
| <b>Online delivery</b>             | An instructional method where course content and learning material is delivered over the internet with no direct face-to-face interaction.                                                                                                                                                                            |
| <b>Police check</b>                | A mandatory check of an employee or contractor to determine whether they have a criminal record and would present a risk if working with children or young people. The screening requirements vary between the States and Territories.                                                                                |
| <b>Under 18s</b>                   | Students who are under the age of 18 before enrolment, at the time of application and/or during part or all of their course of study.                                                                                                                                                                                 |
| <b>Working with Children Check</b> | The Working with Children Check (WWCC) is a mandatory background check of an employee or contractor to assess their suitability for working with children or young people. The screening requirements vary between the States and Territories.                                                                        |
| <b>Work integrated learning</b>    | A period of supervised work for the practical application of learning as part of a course or qualification.                                                                                                                                                                                                           |



## Policy Principles

Kaplan uses the *National Principles for Child Safe Organisations* as a framework for the welfare and safety of Under 18s. The *Child Safe Standards* in this framework have been adapted and imbedded in Kaplan's Policy Principles for young people who are Under 18s:

1. Child safety is embedded in institution leadership, governance and culture.
2. Children and young people participate in decisions affecting them and are taken seriously.
3. Families and communities are informed and involved
4. Equity is upheld, and diverse needs are considered.
5. People working with children are suitable and supported.
6. Processes to respond to complaints of child sexual abuse are age appropriate.
7. Staff and contractors are equipped with the knowledge, skills and awareness to keep children and young people safe through continual education and training.
8. Physical and online environments minimise the opportunity for abuse to occur.
9. Implementation of the *Child Safe Standards* is continuously reviewed and improved.
10. Policies and procedures document how the institution is safe for children and young people.

## Guidelines

### Screening clearances

All employees, including contractors, must have a current Working with Children Check (WWCC) and Police Check conducted according to State or Territory regulatory requirements.

Kaplan ensures WWCCs and Police Checks are completed for all new employees and/or contractors, with all employment contracts requiring mandatory screening clearances.

### Age-appropriate marketing

Policies and processes for student welfare and accommodation arrangements for Under 18 students are publicly accessible, including a dedicated Under 18s webpage which includes an endorsement of child protection by the Chief Executive Officer. Kaplan will also ensure age-appropriate communications are used in all marketing materials.

### Admissions/Enrolment

**Admission/Enrolment** into a Kaplan course is in accordance with:

- Kaplan's Admission Requirements Policy for Higher Education or
- Kaplan's Pre-Enrolment and Enrolment Policy for Vocational Education.

The parent(s) or guardian(s) must sign the admissions application/enrolment form for a student who is Under 18. The Date of Birth is required to determine the age of the student for Higher Education, Vocational Education and non-accredited enrolments.



## Emergency contacts and Mandatory Reporting

Kaplan will maintain current records of the contact details of students, parents, legal guardians or any other adult responsible for the student's welfare. If contact details change, the student must notify Kaplan within seven calendar days.

Kaplan must provide Under 18s with information on who to contact in emergency situations, including contact numbers of nominated employees and information on seeking assistance and reporting any incident or allegation involving actual or alleged sexual assault, physical or other abuse.

State and Territory legislation defines specific groups of people for whom it is mandatory to report the abuse or neglect of children and young persons to government authorities. Mandatory reporters include teaching staff and educators. All employees and contractors to whom a child discloses allegations of abuse or neglect should follow the mandatory reporting procedures outlined in Kaplan's Sexual Misconduct Prevention and Response Policy and the Critical Incident Policy.

## Electronic media

Kaplan is committed to providing a safe online environment. Students must abide by all relevant laws, policies and procedures when using electronic media. Students are personally accountable and liable for everything they upload online.

- Students should refer to Kaplan's Electronic Media Policy and the Online Content, Recording, Storage and Use Policy for further information.
- Employees and contractors must refer to the Kaplan IT Acceptable Use Policy.

## Face-to-face and online contact

Under 18 students are to be identified to any employees who may be required to interact with the student, including being identified as Under 18s on any class or examination lists. All reasonable efforts to mitigate risks are made to make Kaplan a safe place for Under 18s. Employees or contractors should avoid being alone with an Under 18 student by:

- requesting the presence of an additional staff member
- requesting the U18 student to bring their own support person
- recording the conversation (online only and with the student's consent).

## Support and welfare

Kaplan offers students who are Under 18 a safe learning environment through a range of services including:

- a central point of contact
- regular contact
- parents or guardians are kept informed with approval sought for all changes to an Under 18s enrolment.
- awareness of the needs of Aboriginal and Torres Strait Islander people including an acknowledgement of country on the Kaplan Professional website
- access or referral to welfare-related support services.
- age-appropriate emergency and orientation information and management of Grievances, Complaints and Appeals.
- surveys and other opportunities to contribute the students' opinions about their education and welfare to inform policies and procedures for Under 18s.
- providing this additional support until the student reaches the age of 18. The Date of Birth is required to determine when the student is 18 for Higher Education, Vocational Education and non-accredited enrolments.



## Employee training

New employees must complete an orientation on working with Under 18s, with annual refresher training to be completed by all employees.

The training will vary depending on the role and level of contact with Under 18s, and is required for the following people including but not limited to:

- employees,
- contracted lecturers, facilitators, assessors and tutors.

## Guiding Procedures

Kaplan's intent is to create an environment of wellbeing and safety for Under 18s and encompasses the following guiding procedures:

- a child protection screening process for new and existing employees, contractors and reception staff.
- a register of clearance screening of all Kaplan employees and contractors will be maintained by Kaplan Professional to determine when clearance screening is due for renewal.
- an age appropriate Under 18s webpage on the Kaplan website with a weblink provided in all welcome emails to new students.
- an orientation program for Under 18 students
- an orientation program on working with Under 18s for employees, contractors and reception staff including signing the Child Safe Code of Conduct.
- annual refresher training on working with Under 18s for employees, contractors and reception staff.
- an admissions/**enrolment** process for Under 18s:
  - to ensure consistency of approach with Under 18 students
  - to ensure the authenticity of the parent(s) or guardian(s) signature for all Under 18 admissions/enrolments at Kaplan.
- maintaining emergency contact details of Under 18s and parent(s)/guardian(s) with a bi-annual check for any changes in contact details.
- clear guidelines on how to identify Under 18s and when to refer students to designated Under 18s central point of contact.
- Lecturers/facilitators will be notified of any students under the age of 18 participating in online or face-to-face contact.
- all reasonable efforts are made to ensure that Kaplan is a safe place for Under 18s.
- provide under 18s with:
  - a central point of contact,
  - access or referral to welfare-related support services,
  - regular contact,
  - monitoring their progress,
  - surveys for Under 18s to contribute their opinions about the provision of their education and their welfare.
- provide parent(s) or guardian(s) of under 18s with:
  - updates on course progress, critical incidents and any grievances, complaints or appeals
  - approval rights of any deferral, suspension, extension or cancellation of the Under 18's studies
  - all employees and contractors in positions of leadership and management must identify opportunities and take steps for continuous improvement to policies and procedures for Under 18s.

## Complaints and Appeals

Any grievance, complaint or appeal in relation to the implementation of this policy will be managed in accordance with the Grievances, Complaints and Appeals Handling Policy located on the Kaplan website.



## Relevant Legislation and Policies

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

### Commonwealth Legislation

- Australian Human Rights Commission Act 1986 (Cth)
- Family Law Act 1975 (Cth)
- National Principles for Child Safe Organisations
- Work Health and Safety Act 2011 (Cth)
- Privacy Act 1988 (Cth)
- Outcome Standards for RTOs 2025 –Standards 4.3
- United Nations Convention on the Rights of the Child.

## Related Policies

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

### Staff policies

- Critical Incident Management Policy
- Access and Equity Policy
- Electronic Media Policy
- Health and Safety Policy
- Incident and Hazard Report
- Kaplan Professional Child Safe Code of Conduct
- Online Content, Recording, Storage and Use Policy
- Prevention of Harassment and Bullying Policy
- Privacy Policy
- Sexual Harassment Prevention and Response Policy

### Higher Education policies

- Admission Requirements Policy
- Grievances, Complaints and Appeals Policy
- Marketing Policy
- Student Record Management Policy
- Terms and Conditions

### Vocational Education policies

- Grievances, Complaints and Appeals Policy
- Enrolment Policy
- Enrolment Terms and Conditions
- Marketing and Advertising Policy
- Student Handbook
- Student Record Management Policy
- Student Support Policy.



## 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>         |                                         | Legal                                                                                                                         |                               |                       |
| <b>Responsible Officers</b>    |                                         | General Counsel                                                                                                               |                               |                       |
| <b>Implementation Officers</b> |                                         | Head of Operations, Head of Commercial Operations, Head of Student Experience, General Manager, Academic Content Development, |                               |                       |
| <b>Review Date</b>             |                                         | June 2028                                                                                                                     |                               |                       |
| <b>Endorsed by:</b>            |                                         | <b>Approved by:</b>                                                                                                           |                               |                       |
| Chief Executive Officer        |                                         | VP, on behalf of Policy Committee                                                                                             |                               |                       |
| <b>Version</b>                 | <b>Authored by</b>                      | <b>Brief Description of the changes</b>                                                                                       | <b>Date Approved</b>          | <b>Effective Date</b> |
| 1.0                            | Quality, Regulations and Standards Team | New policy.                                                                                                                   | RTO: 19.08.20<br>HE: 17.09.20 | 09.05.2022            |
| 2.0                            | Quality, Regulations and Standards team | Immaterial update to reflect the new reference to the Child Safe Standards in the Outcome Standards for RTOs 2025             | 13.06.2025                    | 1.07.2025             |