

Bullying, Harassment and Discrimination Prevention and Response Policy

Scope

This Policy applies to alleged or actual bullying, harassment or discrimination that materially impacts, arises out of, or is otherwise directly connected to, Kaplan's operations, activities, or responsibilities.

This includes conduct involving students, employees, contractors, other workers, and/or other persons connected with their studies (including on campus, online or at placements), work or other dealings with Kaplan.

For Kaplan employees, additional guidance regarding bullying, harassment or discrimination may be published on the staff intranet for ease of reference and to supplement this policy. When dealing with matters relevant to this Policy, please also consult that additional guidance.

Note: Gender-based violence, sexual harassment or sexual assault are addressed under Kaplan's separate Gender-Based Violence, Sexual Harassment and Sexual Assault Prevention and Response Policy. Where a matter involves a combination of issues covered by that policy and this Policy, Kaplan will determine which policy, or policies should apply to the matter to reduce any unnecessary duplication or delays.

Nothing in this Policy prevents reasonable and lawful academic discussion, debate, feedback, performance management, assessment, decision-making, complaint, criticism, or expression of differing views. Such conduct must nevertheless be undertaken in a respectful and considerate manner consistent with applicable law and Kaplan policies.

Reasonable management action, academic decision-making, or feedback carried out in a reasonable manner does not constitute bullying merely because it is unwelcome or causes disagreement or dissatisfaction.

Purpose

- To establish clear standards of behaviour regarding bullying, harassment, or discrimination, including for all Kaplan employees and students.
- For relevant Kaplan entities in Australia, to support compliance with obligations under the Higher Education Standards Framework (Threshold Standards) 2026, the Education Services for Overseas Students Act 2000 (Cth), the National Code of Practice for Providers of Education and Training to Overseas Students 2018, The National Higher Education Code to Prevent and Respond to Gender-Based Violence (National Code) and the Standards for RTOs 2025, including requirements to promote safe and inclusive learning, working, campus and online environments; maintain accessible complaints and appeals processes; support student wellbeing and support services; and prevent and respond to bullying, harassment, discrimination, victimisation, racism and other discriminatory conduct.
- To outline the processes for reporting and addressing bullying, harassment, or discrimination.

Principles

Kaplan is committed to maintaining a safe, respectful, and inclusive work and study environment and does not tolerate bullying, harassment, discrimination, victimisation, or retaliation. Kaplan is committed to:

- Proactive prevention, education, and response measures.
- Taking reasonable steps to prevent victimisation or retaliation against individuals who report concerns, participate in a process, or provide information.
- Handling reports confidentially, as far as practicable and lawful, and using trauma-informed and culturally safe approaches where appropriate.
- Providing accessible reporting mechanisms, support services, and referral pathways.
- Responding to reports in a fair, timely and proportionate manner, consistent with procedural fairness, privacy, and applicable legal and regulatory obligations.

Kaplan recognises that some individuals - including international students, LGBTIQ+ individuals, and people with disabilities - may face additional barriers to reporting or seeking support. Kaplan will take reasonable steps to maintain reporting and support mechanisms that are culturally safe, accessible, and inclusive for these groups, including through clear information, multiple reporting options, reasonable adjustments, referral pathways, and staff training.

Definitions

Terms	Definitions
Bullying	Repeated unreasonable behaviour directed towards an individual or group that creates a risk to their health and safety. In a workplace context, reasonable management action carried out in a reasonable manner does not constitute bullying.
Cultural safety	An environment in which a person's cultural identity is respected, and where they are not exposed to discrimination, stereotyping, hostility, or exclusion.
Discrimination	Unlawful unfavourable treatment or adverse action based on a protected attribute in breach of applicable federal, state or territory anti-discrimination laws. Protected attributes include race, sex, disability, age, pregnancy, sexual orientation, gender identity, religious belief, marital or carer status, among others. A single act can constitute discrimination.
Kaplan	• 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.
Harassment	Any unwelcome unlawful conduct based on a protected attribute that offends, humiliates or intimidates a person. It may occur as a single incident.
Racism	Systemic, cultural and interpersonal conduct, practices or structures that result in avoidable and unfair disadvantages, exclusion, hostility or harm based on race, colour, descent, national or ethnic origin. This includes racism towards Aboriginal and Torres Strait Islander peoples, antisemitism, Islamophobia, racial vilification and other forms of racial discrimination relevant to Kaplan's community.

Retaliation	Any adverse action taken against a person because they reported a concern, participated in a process, provided information, or supported another person to do so.
Victimisation	Unfavourable treatment of a person because they have made, may make, supported, or participated in a complaint or related process.
Vilification	Public conduct that incites hatred, serious contempt or severe ridicule toward a person or group because of a protected attribute, such as race, religion, sexuality, gender identity, or disability.

Responsibilities

Kaplan

- Facilitate a safe, respectful, and inclusive work and study environment.
- Maintain clear and legally compliant policies and procedures.
- Provide bullying, harassment and discrimination training for employees and students.
- Offer counselling and other appropriate resources to support affected individuals.
- Assess and respond to reports in a fair, timely and proportionate manner, which may include investigation where appropriate, while managing confidentiality in accordance with this Policy.

Leaders (including Academic Leaders)

- Foster and promote a safe, respectful, and inclusive work and study environment.
- Implement relevant policies and procedures, including this, Policy.
- Address any inappropriate behaviour in a timely and appropriate manner.
- Handle complaints in a timely manner, with confidentiality managed as outlined in this Policy.
- Take reasonable steps to prevent and respond to any victimisation or retaliation against complainants or witnesses.
- Where applicable, take reasonable steps to support students under 18 in accordance with the National Code, including welfare monitoring and, where appropriate, engagement with parents/guardians.

Other Employees and Students

- Communicate and interact with others in a respectful, professional, and inclusive manner, and avoid conduct that may constitute bullying, harassment, discrimination, victimisation, or retaliation.
- Report concerns or seek support where appropriate.
- Cooperate with relevant processes and maintain confidentiality as outlined in this Policy.

Prevention and Education

Training and Awareness

- Kaplan will provide regular training for employees and students on recognising, preventing, and reporting bullying, harassment, and discrimination. This training, including awareness of this Policy and associated reporting pathways, will be embedded in student orientation and staff induction, and reinforced through ongoing professional development.
- Bullying, harassment and discrimination preventative measures, reporting options and support services will be communicated during student orientation and staff induction processes, and on a regular ongoing basis.

Risk Management

- Kaplan takes a proactive approach to preventing bullying, harassment, and discrimination.
- This includes identifying hazards that may increase the risk of these behaviours occurring, implementing control measures to address identified risks, and regularly reviewing the effectiveness of those control measures.

Safe and Inclusive Culture

- Kaplan promotes active bystander intervention, respectful communication, and healthy relationships through training, establishing expectations and addressing unacceptable situations and behaviour promptly.
- Students and staff are encouraged to report concerns, seek support, and/or take safe bystander action where appropriate.
- Kaplan's Health and Safety Champion Group (HSCG) leads various efforts to prevent and respond to bullying, harassment, and discrimination. Among other things, the consultative group helps Kaplan to review identified risks and controls, analyse de-identified incident data for trends, and plan and promote health and safety initiatives.

Policy Accessibility

- This Policy and details of support services will be readily available on Kaplan's intranet sites, websites, and student platforms.

Campus and online safety

- Kaplan will advise students and staff on practical actions they can take to enhance safety and security on campus and online, including how to report concerning conduct, access support, use digital platforms appropriately, and respond safely as a bystander.

Reporting and Support

Reporting Channels

Any member of the Kaplan community who experiences, witnesses, or becomes aware of bullying, harassment or discrimination connected with work or study-related activities is strongly encouraged to report it.

Reporting options for Employees:

- Complete an online report through [Donesafe](#).
- You may either report through the incident/hazard form or the inappropriate behaviour form (for anonymous reporting).
- Note, for anonymous reports, Kaplan will not be able to provide direct support to the complainant as the report will not identify the individual completing the form. Kaplan's ability to investigate an incident may also be limited if it is unable to contact the complainant, should additional information be needed.
- Alternatively, employees can speak with their Leader, HR representative, or a trusted leader if they have questions or concerns before lodging a report.

Reporting options for Students

- Incidents can be reported through the inappropriate behaviour form [here](#) or via the QR Code below. Inappropriate behaviour posters (with QR code) are available on campus.



- Reports can be made anonymously through the inappropriate behaviour form. Note, Kaplan will not be able to provide direct support to the complainant as the report will not identify the individual completing the form. Kaplan's ability to investigate an incident may also be limited if it is unable to contact the complainant, should additional information be needed. An anonymous report may nevertheless be used to identify patterns or systemic risks, inform preventative or risk-management action, or be considered together with other information available to Kaplan.
- Students can also disclose an incident to an onsite counsellor, a member of the Student Experience team or a College Service Adviser.

Support Services

Internal

- For students - Kaplan onsite Counselling or Student Experience teams
- For employees - The People and Culture team

External

- Sonder – 24/7 support and assistance (available to Kaplan employees free of charge).
- Other external counselling, legal advocacy, and services as appropriate. Some of these services are outlined at the end of this Policy in Appendix 1.

Confidentiality & Privacy

- Kaplan will handle complaints with care and discretion.
- Kaplan will handle personal information in accordance with relevant privacy laws and keep information confidential where possible. Information may need to be shared on a need-to-know basis where required for safety, legal, welfare, reporting or procedural fairness reasons or as otherwise permitted or required by relevant laws.

Responding to Reports/Complaints

1. Assessment and Response

- Kaplan will assess reports or complaints made under this Policy to determine an appropriate response, having regard to the nature, seriousness and circumstances of the matter, the information available, any immediate safety or wellbeing concerns, and applicable legal, regulatory, and procedural fairness obligations.
- The response may include informal resolution, referral to another Kaplan process, support or risk-management actions, further assessment or formal investigation, or another appropriate pathway.
- Not all reports or complaints will result in a further assessment or formal investigation and the approach taken may vary depending on the circumstances of each matter.

2. Further assessment or formal Investigation

- Where Kaplan determines that further assessment or formal investigation is appropriate, the matter may be considered by an internal or external person with appropriate independence, expertise, and authority.
- Any such assessment or investigation may involve gathering relevant information, considering available records, speaking with relevant parties or witnesses, and/or taking any other steps Kaplan considers appropriate in the circumstances.
- Processes will be conducted as far as practicable in a fair, timely, trauma-informed, and culturally safe manner, and in accordance with recordkeeping and procedural fairness obligations.

3. Possible Outcome & Actions

- Following any further assessment or formal investigation, Kaplan may determine that a complaint is substantiated, partially substantiated, unsubstantiated, unable to be determined, or better addressed through another process.
- Where appropriate, Kaplan may take proportionate action to address identified conduct, manage risk, support affected persons, reinforce expected behaviours, or improve systems and controls.
- Actions may include support measures, education or training, facilitated mediation or resolution, behaviour expectations, management action, referral to another Kaplan policy or process, disciplinary action, referral to an external agency where required or appropriate, and/or any other action Kaplan considers appropriate in the circumstances.
- For student matters, relevant student conduct, academic misconduct, non-academic misconduct, complaints, and appeals processes may apply, depending on the nature of the matter.

4. Monitoring, Review & Continuous Improvement

Regular Review

- Kaplan will review this Policy at least every three years or sooner if there are relevant legal or regulatory changes or improvements identified proactively.
- Kaplan will periodically review complaints-handling and appeals processes in consultation with students and staff, including (where appropriate) people with lived experience of, or who have been directly affected by, discrimination, harassment, victimisation, violence, racism, or other discriminatory conduct. Among other things, reviews may consider accessibility, cultural safety, ease of navigation and whether administrative barriers are minimised.

Data Use

- Kaplan will take reasonable steps to use de-identified data from reports, complaints, incidents, consultation, and feedback, to identify patterns, systemic issues and emerging risks relating to bullying, harassment, discrimination, racism, and other conduct addressed in this Policy.
- Aggregate data will be provided to the Health and Safety Champion Group and the Kaplan Higher Education Corporate Boards.

Continuous Improvement

- Lessons from investigations, reviews, consultation, feedback, and changing best practices, will inform updates to training, policy, and support services.

Relevant Legislation

This policy is guided by, and operates in conjunction with, applicable legislation, regulatory standards, and codes, including but not limited to the following:

Australia:

- Applicable state and territory work health and safety legislation.
- Australian Human Rights Commission Act 1986 (Cth).
- Codes of Practice published by safety regulators, including in respect of managing psychosocial hazards at work.
- Education Services for Overseas Students Act 2000 (Cth).
- Fair Work Act 2009 (Cth), including stop-bullying and general protections provisions.
- Higher Education Standards Framework (Threshold Standards) 2026.
- National Code of Practice for Providers of Education and Training to Overseas Students 2018.
- Privacy Act 1988 (Cth).
- Racial Discrimination Act 1975 (Cth); Sex Discrimination Act 1984 (Cth); Disability Discrimination Act 1992 (Cth); Age Discrimination Act 2004 (Cth).
- Standards for Registered Training Organisations 2025.
- State and territory equal opportunity, anti-discrimination, and anti-vilification legislation.
- The National Higher Education Code to Prevent and Respond to Gender-Based Violence (National Code).

New Zealand:

- Education and Training Act 2020, where applicable.
- Employment Relations Act 2000.
- Health and Safety at Work Act 2015.
- Human Rights Act 1993.
- Privacy Act 2020.

Where there is any inconsistency between this Policy and legislation, the legislation takes precedence. Nothing in this Policy prevents, limits or delays Kaplan taking immediate steps to address serious misconduct or responding to claims before a court, tribunal, or other body.

Amendments

Kaplan reserves the right to amend this Policy at its discretion.

Version Control and Accountable Officers

It is the joint responsibility of the Implementation Officer and Responsible Officers to maintain compliance with this Policy.

Policy Category		Corporate		
Responsible Officers		Executive Director People and Culture, Vice President Academic		
Implementation Officers		School Executive, College Director or equivalent, P&C		
Review Date		September 2029		
Approved by: Corporate Board		Endorsed by: Academic Board		
Ver sio n	Authored by	Brief Description of the changes	Date Approved	Effective Date
1.0	Kaplan's People and Culture team.	Conduct a major policy review and rewrite to reflect the latest Kaplan reporting mechanisms, HESF 2026 and The National Higher Education Code.	17/09/2026	05/10/2026

Appendix 1:

Support services

In situations of immediate danger, call [000](#) for help from the Police and Ambulance. Please see the links below for further information and support.

The services available vary for students and employees and between Kaplan schools. Please refer to the provider websites, policy documents, and terms and conditions for current information.

Health and Wellbeing Support for International students

It is a condition of Australian Student Visas that individuals hold Overseas Student Health Cover (OSHC) for the full duration of their study in Australia.

Kaplan's preferred OSHC provider is Allianz Care Australia.

Students who have an OSHC policy with Allianz Care Australia may have access to a range of health, wellbeing, and support services.

These services may include:

- Health and medical support
- Telehealth services
- Mental health and wellbeing support
- Safety and urgent assistance services
- Information about healthcare providers and claiming options.

Students should refer to the Allianz Care Australia website, its policy documents, and the relevant service terms and conditions for the most up-to-date information about available services, eligibility, and access.

Students who have an OSHC policy with another insurer should contact their insurer for information about relevant health, wellbeing, and support services available to them.

Counselling and wellbeing support for Kaplan Professional students

Kaplan Professional engages Telus Health to provide confidential and free counselling to support the wellbeing of our students. Telus Health offers initial support and assistance to individuals who have personal and/or work-related issues that may impact on their:

- Wellbeing
- Work and study performance
- Safety

- Individual and workplace morale
- Psychological health

To access the Telus Health service, call 1800 835 871.

Safety, health, and wellbeing support for employees

Sonder provides 24/7 access to safety, medical and mental health professionals, and resources.

To activate Sonder (for Kaplan employees):

Watch the video [here](#)

- Download the Sonder App from an App Store
- Enter a Kaplan email address (Kaplan, KBS or Murdoch College domains only)
- Complete the single-sign-on process as instructed
- Once completed, the account login is available
- For assistance with logging in, reach out to Sonder's tech team via hello@sonder.io

External services

Staff and students may also wish to access external support services, including emergency, crisis, medical, mental health, or community support services.

Service Provider	Contact Details
Emergency	Dial 000 (AU) / 111 (NZ) or local equivalent.
Lifeline	Dial 131144 (AU) / 1737 Need to talk? (NZ)
SES	132500
Poisons Information Centre	131126
1800Respect	1800 737 732
Translating in interpreting services	131 450