



SAFEGUARDING POLICY

KAPLAN TEST PREP UK

About Safeguarding

Kaplan Test Prep UK recognises its responsibility to safeguard and promote the welfare of children within the legal framework of the Children Acts 1989 and 2004. Under the terms of the Children Act 2004 anyone under the age of 18 is considered to be a child/young person.

Kaplan Test Prep UK (KTP UK) recognises that the welfare of the child is paramount and takes seriously its responsibility to safeguard and promote the welfare of children who are users of KTP UK services.

Safeguarding also relates to the protection of vulnerable adults who may be at risk of harm, abuse or manipulation as a result of their social or personal circumstances. At KTP UK this may, for example, apply to students 18yrs and over who are disabled.

Who We Are

Kaplan Test Prep was established in 1938 in the United States, and began operating in the UK in 1993. We were registered in 2005 as a UK limited company, Kaplan Test Prep and Admissions Ltd., company registration number 5521435.

What We Do

Kaplan Test Prep UK is a provider of test preparation (coaching) and related services in the form of courses, tutoring, books, on-demand products and informational events. Our students are typically preparing for a university admissions test, an English-language proficiency test, a professional licensure exam or a university degree programme application. Our courses and services are short-term and non-residential.

We deliver services both in-person and online. Kaplan offers courses around the UK and sometimes internationally. We provide services in our own premises, in facilities we have hired for the duration of the delivery of a course or event, at educational institutions such as secondary schools, and via online platforms such as Meet, Adobe Connect and Zoom.

About This Policy

This policy aims to ensure we safeguard children and vulnerable adults who are users of Kaplan Test Prep UK services whilst they engage with our staff and services. It also provides guidance and overarching principles to those who represent us as staff, to guide our approach to safeguarding.

This safeguarding policy should be read in conjunction with KTP UK's terms and conditions, which are available on our web site www.kaptest.co.uk or by contacting our customer service team at support.global@kaplan.com.

Approach to Safeguarding

We aim to create a safe environment within which children/young people can learn and adults can work with the security of clear guidance. These guidelines are for the information of all staff, as well as parents and students to whom we offer a service. We will endeavour to ensure that:

- Students are listened to and respected
- Staff are subject to appropriate recruitment procedures
- Staff are given suitable support and training
- Child protection and other safeguarding concerns communicated to the company are acted upon promptly

If you are concerned that a KTP UK student might be at risk or is actually suffering abuse, or you have any other safeguarding concerns, you should inform the Kaplan Test Prep UK team as soon as possible at:

Kaplan Test Prep UK, 3-5 Charing Cross Road, London WC2H 0HA, UK

Tel: 020 7930 3130

Email: support.global@kaplan.com

Address your communication to the attention of any one of the following senior managers, who will be in a position to respond to your safeguarding concerns:

- **Executive Director of Operations**, Louise Cook
- **Director of Operations**, Joanna Przybyl
- **Senior Director of Academics**, Teresa Rupp

All safeguarding concerns will be handled within the framework of KTP UK's standard procedures and policies, including our emergency procedures, and may involve contacting the police or other relevant statutory bodies.

Staff Recruitment and Training

KTP UK will comply with good practice in the recruitment and training of its staff, and this will be in line with legislative requirements. Kaplan Test Prep staff undergo the relevant pre-employment checks for the country in which they are employed. In the UK these include Disclosure and Barring Service (DBS) checks applicable for their role and reference checks. All staff receive training and induction appropriate to their role.

Data Protection

All personal data held by Kaplan Test Prep UK is held in accordance with the company's [privacy policy](#).

Photography and Recordings

No photos, or other visual recordings, will be taken or published of any child attending a class, tutoring session or other activity unless prior written permission is sought from a person with parental responsibility. Please contact Kaplan Test Prep directly should you have any concerns regarding any person taking photos during Kaplan Test Prep courses or tutoring sessions.

Service Delivery Setting

Kaplan delivers its courses and services in a variety of settings.

In-person course and informational event delivery - Kaplan Test Prep instructors deliver courses and events to students at Kaplan Test Prep's own premises and at other geographic locations where facilities are hired for the duration of a course, for example universities, conference facilities, hotel meeting rooms or classroom facilities at other Kaplan company premises. Where courses are delivered in non-Kaplan Test Prep premises, while every effort is made to select only the most suitable venues, please note that the staffing and use of those premises are not under the direct control of Kaplan. The locations of all Kaplan courses are listed on our web site www.kaptest.co.uk, and the full address of a course is communicated directly to enrolling customers and is available from our customer service team.

In-person delivery of programmes for schools - where Kaplan has been contracted to deliver a course or event at a secondary school, sixth form college or similar location, the school will be responsible for the physical premises and the welfare and behaviour of its own students.

Online service delivery - Kaplan Test Prep instructors and staff deliver courses, one-to-one tutoring and informational events over the internet via platforms such as Adobe Connect, Meet, Skype and Zoom. Where a camera is in use, instruction will be delivered by the instructor with a neutral and appropriate background. Kaplan Test Prep tutoring staff are recruited and trained following the guidelines outlined in the section on staff recruitment and training above.

Further Notes: Provision of Services for Students Aged 16-17 Years

One-to-one Tutoring Sessions - students in this age group may travel to and attend tutoring sessions held at Kaplan Test Prep premises unsupervised, though parents or a supervising adult are welcome to accompany a student to and from sessions. Tutoring may be delivered at the student's home if agreed in writing between Kaplan Test Prep and a parent of the student, and only with an adult with parental responsibility present in the home. Tutoring sessions may take place at other locations than the student's home and Kaplan Test Prep premises only with the mutual and written agreement of Kaplan and a parent of the student. Kaplan Test Prep tutoring staff are recruited and trained following the guidelines outlined in the section on staff recruitment and training above.

Student-Teacher Communications - email communications outside of scheduled instruction periods (for example to agree a tutoring schedule, or to respond to student academic enquiries post-course) should be, wherever possible, via the staff member's Kaplan email account. Telephone communication between teachers and students is acceptable for academic support purposes outside of course or tutoring sessions, and telephone or text message communication is likely to be necessary for tutoring schedules to be agreed and maintained.

Unsolicited Student-Teacher Communications - teachers will report any unsolicited (i.e. unrelated to the service delivery contract in place between Kaplan and the student) student telephone, text, email, social media or other communications to the KTP UK management team.

Further Notes: Provision of Services for Children Under 16 Years

Individuals under 16 years of age are welcome to use Kaplan Test Prep UK programmes, but only if the appropriate parental agreements and permissions are in place - see our [terms and conditions](#) and guidance below.

If you or your child are under 16 years of age and wish to receive teaching, tutoring or other academic support from Kaplan Test Prep UK, please contact our customer services team at 020 7930 3130 or by email at global.support@kaplan.com to discuss your specific circumstances and needs and whether we are able to meet them satisfactorily.

Should a student under 16 years old enrol or be enrolled without the prior knowledge of the KTP UK team, on arrival for the first session of instruction (whether in-person or online), the instructor will refer the student and their parent(s) to the KTP UK customer service team. Instruction will not be able to take place without the written approval of one of the following authorised individuals: Director of Operations, Senior Director of Academics, Executive Director of Operations. This is to ensure that all appropriate discussions have taken place and approvals have been received from a parent before instruction begins.

The arrangements below will be prerequisites for delivery of service to any student under 16, and, following discussion between our team and the student's parent(s), other arrangements may be put in place to ensure an acceptable level of safeguarding:

- Written permission for the enrolment of the student and the processing of their personal information must be received from a person with parental responsibility. A record of this permission will be stored in our business systems. The KTP UK customer service team will ensure that the student is opted out from receiving all KTP UK marketing communications, unless otherwise requested by the parent(s).
- Children under 16 years of age who attend Kaplan Test Prep UK premises for tutoring or teaching services must be accompanied throughout by an adult over the age of 18 who brings the child to the premises and accompanies them home again afterwards.
- Children under 16 years of age who attend online tutoring or teaching must be in the presence of an adult aged 18 years or over for the duration of the service provision.

Please note that KTP UK reserves the right to decline to teach or otherwise work with a student aged under 16 years, whether for safeguarding reasons, because we believe the service will not be of clear benefit to the student at this point in their education, or due to other reasonable concerns.

Review

The Company reserves the right to modify this policy. Policy and procedures will be reviewed and amended from time to time by the Company in line with legal requirements, business changes, operational needs, and for other reasons that may arise.

Last updated: July 2019