



Corporate Responsibility Policy

At Kaplan, we are working hard to build a brighter future together. We are guided by our values (Act with Integrity, Grow Knowledge, Empower & Support, Create Opportunity, Drive Results Together) and we intend to create success for our learners, our customers, our people and for our organisation in a positive and sustainable way.

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1. Purpose and scope

- a. This policy applies to all businesses and employees within the Kaplan Professional UK group (KPUK). It sets out our commitment to have a positive impact through the way in which we do business, on our environment and in our community. Our governance structure is set up to support this, as well as our three 'Building Brighter Future' pillars: Environment, Community and Opportunity.

2. Responsible business

We act with integrity, and we're proud to be conducting business the right way.

a. Governance

- i. We are committed to strong governance which underpins the accountability, transparency, and integrity with which we conduct our business and provide education, training, and career services.



- ii. Our management structure is set up to ensure we have independent oversight and support
- iii. Where areas are identified as important to governance we will aim to gain external confirmation and insights to give confidence in the quality of what we do.
- iv. Our people are our business, we work hard to create and maintain a positive working environment.

b. Education

- i. As an educator we take seriously our responsibility to ensure we raise awareness of all aspects of Corporate Responsibility
- ii. Corporate responsibility is included in the syllabi of many of our qualifications for learners and as part of the citizenship aspect of our apprenticeships.
- iii. We provide information and guidance to learners on living sustainably whether learners are onsite or learning remotely

c. Health & safety

- i. We operate a Health & Safety Policy which is reviewed annually.
- ii. We have three trained and British Safety Council/NEBOSH-certified Health & Safety practitioners in place, we provide manual handling training for Warehouse Operatives and Facilities Officers, and a Health & Safety induction guide is included within our induction programme for new employees.
- iii. We have specific policies and procedures in place to cover our warehouse operation, first aid, fire marshals, and lone working.

d. Ethics & compliance

- i. Graham Holdings Company, Kaplan's parent company, operates a group Code of Business Conduct, which employees must confirm they have read upon joining and every two years thereafter. All employees are required to complete training every two years.
- ii. Kaplan operates an Anti-bribery & Corruption Policy and employees in higher-risk role categories are required to complete training every two years.
- iii. An up-to-date Modern Slavery Statement is published to our website annually. This statement outlines Kaplan's standards to ensure that all employees are treated with respect and dignity, are working under their own free will, and are being properly compensated for their efforts. We are committed to combatting slavery and human trafficking and ensuring that we are not complicit in any human rights violations. We support and respect the principles proclaimed in the Universal Declaration of Human Rights and believe businesses should ensure that they are not complicit in human rights abuses.



- iv. Kaplan has put in place appropriate data protection policies and privacy notices. All employees complete data protection training upon joining and every two years thereafter, and information security training upon joining and then annually.

e. Labour practices

- i. We are committed to maintaining a workplace free from child labour, forced labour, physical abuse or discipline, the threat of physical abuse, sexual or other harassment, and verbal abuse or other forms of intimidation.
- ii. We believe everybody should be paid a wage which is sufficient to live on, so all our employees receive a rate which is no less than those published by the Living Wage Foundation. We intend to become accredited as a Living Wage employer, and will work with relevant suppliers to pursue this.
- iii. All of our teams are required to operate clear, fair pay structures which are made available to employees on our intranet and in a weekly internal vacancies email.
- iv. Where possible, we engage employees on permanent employment contracts. We only use fixed term contracts for projects and other short/medium term needs. We use agency temps only for short term needs or for urgent cover (the exception being in our warehouse, where we engage operatives via a temp to perm arrangement without interviewing them, and reduce their probationary periods by the duration of the temp engagement). When we engage people on a casual worker basis, the flexibility works both ways - the individuals have the right to turn down work we offer, and to accept work from other employers or clients.

f. Equality, diversity & inclusion

- i. We operate an Equality, Diversity & Inclusion (EDI) Policy, and we aim to provide an environment that embraces diversity and promotes equality and inclusion in a way which enables and inspires all our employees to succeed.
- ii. Our job description and vacancy advertisement templates contain a candidate EDI statement, which all recruiting managers are required to include.
- iii. All our employees and managers undertake EDI training which was created in-house at Kaplan.
- iv. Through measurement and data analysis, and by listening to our colleagues, we seek to identify where any significant inequalities exist within our organisation and we implement strategies to reduce or eliminate them.
- v. We issue quarterly employee EDI reporting, and an annual employee EDI report.



g. Procurement

- i. We aim to have a positive impact through the way in which we do business, on our environment, and in our community. To extend this impact into our supply chain we operate a Responsible Procurement Policy, which incorporates a Supplier Code of Conduct that our suppliers are required to agree to.
- ii. Procurement decisions are based upon product, service, price and our Responsible Procurement Policy.
- iii. Organisations with whom we spend or expect to spend more than £5,000 per year are asked to provide information which demonstrates their compliance with our [Responsible Procurement policy](#).

3. **Creating success for our people**

At Kaplan, we help create successful careers for our learners and customers - and for our employees too. Our values guide us to make Kaplan a great place to work where everyone can succeed.

- a. Act with Integrity: Integrity is engrained in the way we work, and everything we do is consistent with our purpose and values. We build clarity around how we will create success - the Kaplan Way.
- b. Empower & Support: We make sure everyone has the space and the tools they need to work together and continuously improve how and what they deliver to our customers - directly or indirectly.
- c. Create Opportunity: This is a place where people can become inspirational educators, grow into experts in our specialist fields and build leadership careers. Those who drive Kaplan's success, find their success at Kaplan.
- d. Grow Knowledge: Learning is in our DNA. Investing in our ever-growing knowledge of our customers, our markets and our individual fields creates success for our learners - and for ourselves.
- e. Drive Results Together: Focusing on what matters most, we collaborate and partner with colleagues, setting targets and measuring progress to turn ambitions into outcomes, which we all then celebrate.

4. **Environment**

We are committed to working together to continuously improve our practices so we can minimise our impact on the environment, as set out in our Environment Policy.



- a. We currently measure our scope 1 and 2 carbon emissions and report these results under the 'Streamlined Energy and Carbon Reporting' (SECR) guidance. We are also committing to investigating the impact of our scope 3 emissions and the feasibility of becoming a net zero business.
- b. Given the nature of our main business activities (education and assessment) we are not a high carbon emitter but we aim to further minimise our carbon footprint by giving particular focus to the impact of our energy use and our business travel.
- c. We are committed to continuously improving our energy-efficiency and reducing the impact of our energy use.
- d. We are committed to minimising the impact of our waste and we have processes in place to reduce, reuse and recycle.
- e. To demonstrate our environmental commitments to our learners and to help them minimise their own environmental impact, the physical items we provide to them (e.g. books, binders and bags) are environmentally friendly.

5. Community

We empower and support our employees to contribute positively to their communities.

- a. We operate a payroll giving scheme to make it easy for our employees to donate to charities, and we pay all the administration charges.
- b. In addition to employee-led local fundraising drives, we run national events and initiatives annually.
- c. Employees are encouraged to take 15 hours (pro-rated) of paid volunteering leave each year.
- d. We seek opportunities to gift valuable but unused resources to good causes, and charities make use of our spare classroom space during quieter teaching seasons.

6. Opportunity

We broaden opportunities for people to develop the skills and confidence needed to build successful working lives. We are here to make a difference to every learner and inspire them to succeed,

- a. We partner with Career Ready sharing our expertise through mentoring and masterclasses to help people from disadvantaged backgrounds develop the skills, confidence and attitudes needed to build successful working lives.

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- b. Working with RefuAid, a charity that focuses on finding sustainable solutions to the barriers faced by refugees looking to restart their life in the UK, we support students to gain their ACCA qualification by covering the costs of tuition, exam and institute registration fees.
- c. We support Leadership Through Sport and Business by delivering interview training, free AAT training, and additional learning support where needed, to cohorts from their Apprenticeship Programme.
- d. We provide paid internships through the organisations Career Ready and 10,000 Black Interns to give meaningful work experience.
- e. We provide 12-month scholarships to kickstart the careers of young people from disadvantaged backgrounds via our Brighter Future partners, Career Ready, LTSB and NewGen Accountants and with Kaplan directly.

Policy review & contacts

- a. If you have any questions about this policy, your line manager or the HR team can help.
- b. Our policies are reviewed and (if required) updated at least every two years in line with legal obligations, business objectives, and operational needs. We will notify staff of some key changes, but it is not practical to notify of every change that occurs so it is everyone's responsibility to keep themselves up to date with the current versions of policies as made available via our intranet. Please revisit employment policies at regular intervals, and refer to specific relevant policies when the need arises.