



Pearson Global Content Policy for Business Partners

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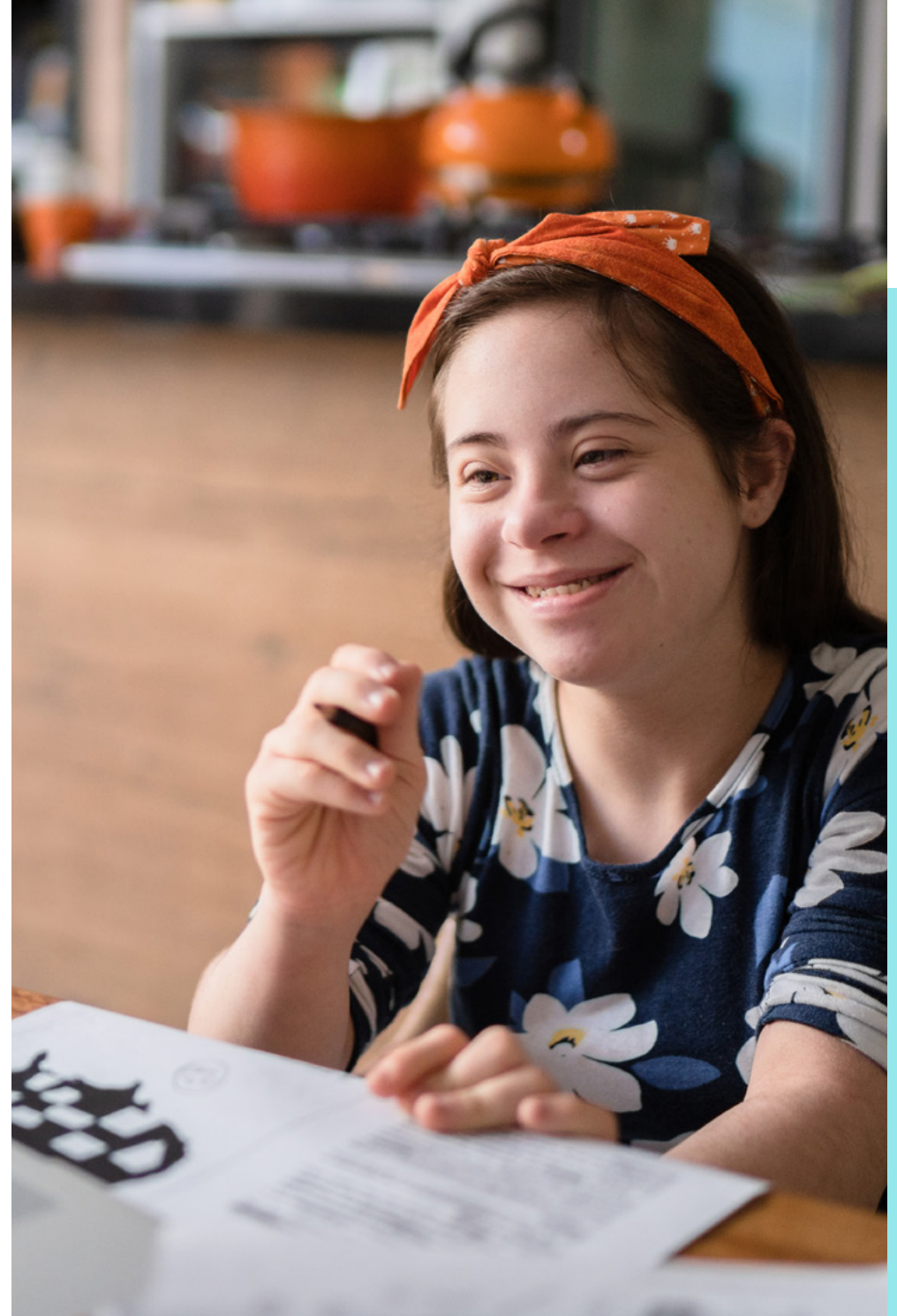
Foreword

At Pearson, our purpose is to add life to a lifetime of learning. Learning is not just one stage in life. It's a lifelong journey in which people expect real growth and impact. We envision a future where everyone can realize the life they imagine through learning, and our values guide everything that we do: we ask why, we ask what if, we earn trust, we deliver quality, and we make our mark.

Every day, people place their trust in Pearson to provide learning content that is engaging, purposeful, and free of discrimination and that minimizes bias. In our rapidly changing society, it's more important than ever for learners at every stage of life to have access to high-quality, trusted materials that are evidence-based and created by subject-matter experts.

That's where our Global Content Policy comes in—to help Pearson deliver relevant, balanced, objective, and inclusive products, services, and solutions. It's how we positively impact the lives of individuals and the world around us.

Pearson Executive Management



Introduction

Pearson is the world's leading learning company, creating vibrant and enriching Content¹ designed for real-life impact.

At Pearson, our job is to reach and engage people in learning by fostering critical thinking, developing knowledge and skills, and enabling an understanding of our complex world.

We produce high-quality learning experiences, media, and services that are engaging, credible, and designed to enable consumers to realize their potential throughout their learning lives. Earning people's trust in our brand to consistently deliver on our purpose is central to our values wherever we operate.

The Pearson Global Content Policy (herein referred to as the "Policy") provides a set of principles that determine Pearson's Global Content Standards.² The Policy is intended to guide the design, creation, development, and production of our Content throughout our business.³ The central aim of this Policy is to enable the development of high-quality, evidence-based, customer-centric Content that drives greater inclusion in, and access to, learning for all.

Learners remain at the heart of what we do. Underpinned by our shared Purpose and Values, the definitions provided in this Policy work to deliver enriching learning experiences that lead to demonstrable outcomes for the learner. Using a range of substantiated viewpoints and information, our Content is further informed by the authentic, diverse experiences, needs, and wants of learners, customers, and other consumers.

This Policy, in conjunction with our Accessibility Framework, establishes objectives for ensuring that Pearson Content represents high ethical standards. We strive to provide Content underpinned by evidence-based decision-making that complies with applicable law and is meaningful and accurate in representing the diversity of people, communities, societies,


and cultures we serve. The Policy also enables sustainable decision-making regarding Content: that is, considering how we can increase access to learning for more people worldwide through the structure and design of our Content.

By working with Partners who demonstrably share our values and commitments, we deliver trusted learning experiences that add more life, to more moments, for more people around the world.

This Policy applies to Content across all of Pearson. It is informed by the content and editorial guidelines in operation across our business, as well as external guidelines consulted during the creation of this Policy.

It is important to note that concepts, terminology, and best practices associated with diversity, equity, inclusion, evidence-based approaches, and legal and ethical frameworks evolve and are based on cultural and geographical contexts (see Legal, Ethical, and Cultural Sensitivities – Page 12). The Policy and its associated guidance will be periodically reviewed, taking this constant evolution into account, and any necessary updates will be shared with employees and relevant Business Partners.

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1. "Pearson Content" or "Content" covers any Pearson-owned content that is published for, released to, or used by the public or employees, including, but not limited to, qualifications, platforms, assessments, courseware, textbooks, and training, promotional, and marketing materials, in both print and digital formats, as well as content delivered via live services, such as professional development material, courses, training and tutoring. Pearson employees providing content creation (e.g., work-for-hire), endorsement, and consultation and procurement services are expected to align with the principles defined in this Policy in advising, guiding, creating, or making content-related purchasing and development decisions in the course of the provision of such services.
 2. Our Global Content Standards are underpinned by the principles defined in this Policy. Our "standards" refer to the expected levels of quality for content development outlined in this Policy, which are scaffolded by associated guidance, processes, and systems.
 3. Pearson operates an Integrated Business Model, including 5 Divisions structured to support customers and consumers through their lifelong learning journeys: Higher Education, English Language Learning, Assessments and Qualifications, Workforce Skills, and Virtual Learning. Our learning ecosystem is designed to drive learning for everyone, wherever they are and however they want to learn.



Section 1: Statements of Principle

Statements of Principle

We strive to create, develop, and present Content that is:

- › grounded in evidence and facts
- › inclusive, and meets the needs of the diversity of audiences we serve
- › free from discrimination and minimizes bias
- › ethical and adheres to legal requirements

These principles are interdependent, and content contributors should give them equal consideration in developing and presenting high-quality Content that provides enriching learning experiences for all.

Here's how the principles work in practice to help content contributors:

To ensure that our Content is **evidence-based and factual**, the design, selection, and inclusion of evidence and information is required to be justifiable and demonstrate respect for human rights.

We expect that the choice of information in our content reflects and is inclusive of the **diversity of audiences** we serve and meets their wide-ranging needs. Developing content inherently means that individuals or groups of contributors will make personal judgments about what to include or exclude in materials they are developing. In doing so, contributors should make decisions that minimize bias, leading to content that does not discriminate against individuals, groups, or communities.

Content contributors must be honest and transparent about their choices so that content is developed **ethically** and in **adherence with applicable legal requirements** in the regions in which we choose to operate.

Trust and quality are core to everything Pearson does. All Content contributors are expected to understand and apply these principles as explained in this Policy. This helps ensure that learners, educators, and other consumers and customers have confidence that Pearson Content is developed with rigor and integrity. We expect all Business Partners who create and contribute to Pearson-owned content⁴ to uphold and abide by this Policy and the Pearson Code of Conduct as you work with us.

4. The audience for this Policy is Pearson employees and Business Partners who contribute to Pearson-owned Content. This encompasses the range of creatives we contract to contribute to the design, creation, development, editing, or localization of Pearson Content. It also includes joint venture partners, vendors, franchisees, distributors, suppliers, and temporary employment agency employees responsible for the described activities

Evidence and Facts

- Pearson aims to produce Content that is well-researched, evidence-based, globally referenced, and culturally relevant, and displays:
- › use of a range of corroborated sources to inform the development of content
 - › alignment with standards and best practices set by independent professional bodies, international and national
 - › factuality, credibility, and respect for truth
 - › fairness and balance
 - › political independence
 - › respect for and inclusion of diverse local governance, knowledge sources, languages, cultures, and customs
 - › respect for privacy

We strive to integrate best practices to support high-quality learning into the design of our Content, to enhance the experience for all learners and consumers, and to maintain a body of knowledge that is respected and reflects our expertise in learning. This means that we apply an evidence-based approach in the design, development, review, and assessment of our learning Content, to facilitate learning that has a real-life impact on learners, their progress, and their success.

Accuracy in the representation of facts and evidence presented in our content, according to the purpose of the content, is an essential element of applying this principle. In doing so, we expect that any information we use to develop our Content is derived from trusted sources and that all contributors to Content remain accountable for verifying this as requested by relevant parties⁵ in Pearson. We accept that there may be occasions where errors occur or where further guidance is needed. In such instances, Pearson Content contributors are expected to report any inaccuracies or concerns as soon as possible to their Pearson Business Lead.⁶

5. This can include line managers, our legal team, or any other party responsible for managing and monitoring our Content.

6. The "Pearson Business Lead" is the Pearson employee who has contracted the Business Partner and is their named contact.

Inclusion and Diversity

Pearson aspires to be a company that authentically presents and promotes the inclusion of all people, from a diversity of backgrounds and across characteristics, within our learning experiences. We strive to meet our customers' needs in this regard, and to ensure that the evidence and facts provided in our Content reflect this aspiration.

We also endeavor to provide equitable access to our Content for diverse learning needs and to support the full participation of all consumers. This means that we develop our Content to meet the needs of learners and other consumers at their starting point and work to remove barriers that affect their engagement and learning outcomes.

Taking this approach ensures the relevance, validity, and vitality of our Content. It increases the value of learning for customers, broadening learner perspectives and setting them up to thrive in an increasingly interconnected world.

In doing so, we will take into account:

- › the diversity of our global audience, including customers and consumers;
- › the accessibility of our products and whether they are equitable and fit for use for people with different learning characteristics and preferences, including learners with disabilities, learners who are neurodiverse, and learners with different communication and language needs;
- › the language rights and identity of individuals and communities accessing our material;
- › authenticity in the representation and consideration of local cultural perspectives, knowledge, sensitivities, and contexts;
- › the breadth of factors that influence the learning experiences and outcomes of different individuals and groups;

- › an inclusive approach to the narratives, perspectives, and lived experiences of individuals and groups referred to in our Content, ensuring that our Content does not represent prejudiced or inequitable treatment of individuals or groups.

Freedom from Discrimination and Minimizing Bias

Our values guide learning experiences for many audiences. We endeavor to truthfully represent and reflect the rights⁷ of all sectors of society, in all nations which we operate, without distinction or discrimination on the basis of personal and social characteristics.

In doing so, we aim to ensure the authentic and respectful representation of people, communities, and societies in our Content, taking a considered and informed approach to minimize the impact of our own biases or cultural reference points on our decision-making.⁸ Our Content should not demean, place judgment on, or stereotype individuals or groups of people based on their personal or social characteristics and should not be derogatory toward people regardless of difference.

Pearson also applies this respect to all contributors to our Content and expects that content decisions made regarding the facts and evidence we present are sound and taken with respect for the rights of consumers and customers at their center.

7. This includes respect for the rights to life, freedom from harm, culture and art, development, education, equality, fairness, humane treatment, freedom from exploitation, knowledge of rights, privacy, and work. The rights listed are not exhaustive. Pearson Content contributors are expected to be able to reference how the respect for human rights (as defined by the United Nations Declaration of Human Rights and the United Nations Convention on the Rights of the Child as codified in the geography the content is developed for) are reflected in the selection of facts and evidence for inclusion in Pearson Content, in accordance with the stipulated purpose and intended outcomes of the relevant Content.

8. This includes considering the age range of the intended audience and ensuring that Content explicitly designed for children is appropriate according to the relevant ages and stages of development

Ethics and Legality

Pearson has an obligation to produce Content that is accurate, ethical, and trustworthy and to ensure that the consultation services we provide our partners reflect the same values. Pearson must also comply with relevant legal requirements in the countries and regions in which we operate.

Content should align to laws and ethical practices related, but not limited, to:

- › anti-bribery and corruption
- › avoidance of harm and offense
- › conflict of interest
- › data protection
- › editorial freedom and integrity
- › fair and honest dealing
- › freedom of the press
- › intellectual property
- › laws of the country in which it is intended for use, including geopolitical considerations (e.g., country borders)
- › regional⁹ education policy or prescribed standards
- › principles of political impartiality and independence

Taking an ethical approach means developing our Content in responsible ways that are suitable to meeting learners' and customers' needs. We aim to enable engagement in learning, spark curiosity, and develop Content that leads to the intended outcomes for all learners throughout their learning journey. We make reasoned, verifiable judgments on what we include in our Content, subject to legal restrictions where applicable, to align with our Company purpose, values, and with the other principles as defined in this Policy.

Ethical guidance on selecting or reusing assets that have been rights-cleared by a different geographical nation or region: cultural appropriateness of Content.

Assets such as images, video, and text should be selected with global release or distribution in mind and should reflect sensitivity to cultural representations of their intended markets. Co-creation or co-selection of Content should involve local communities served by the product or service, particularly where Content is culturally sensitive or controversial.

The Pearson Rights and Permissions teams can access a diverse range of visual and written third-party Content. When the adaptation of Content is needed to increase representation of specific cultural contexts or address cultural appropriateness, assets should be replaced. In general, assets should not be manipulated, particularly people's physical appearance or clothing.

Contact your Pearson Business Lead for advice on diverse asset research and asset reuse clearances or replacements. Further information on cultural sensitivities can be found on Page 13 of this Policy.

9. "Regional" refers to a defined geographical territory or state with a nationally recognized and established government.



Section 2:

Scope of the Policy

Scope of the Policy

Introduction

The Policy and its supporting resources apply to all Pearson-owned print and digital Content for internal or external audiences, including Content delivered via live services, regardless of where it is created and by whom. This covers Pearson-owned Content created across all platforms and business functions and includes employees not directly involved in Content creation. All Pearson employees and non-Pearson Content contributors are expected to be aware of this Policy and to adhere to the principles laid out within it as applicable to Pearson Content. We also expect that the content consultation and verification services we provide to our partners reflect the same values.

Pearson is committed to fostering ethical, evidence-based, factual, and inclusive approaches to learning for the benefit of learners and other consumers of our Content. Despite our commitment and efforts, occasions can occur when oversights lead to potential negative impacts on learners and customer complaints, and the consequences can devalue trust in our brand.

Indeed, Pearson's credibility as the world's leading learning company is directly related to how our learning experiences reach and enrich learners' lives, enabling them to realize the life they imagine. We earn this credibility and strengthen customer and consumer trust by consistently delivering high-quality, evidence-based learning experiences and outcomes.

We strive to develop creative, innovative solutions that are context-responsive and authentically represent the communities we serve. Essential to this is our commitment to inclusion and relevance at local and global levels. Content that does not reflect this commitment is ineffective in meeting the needs of learners and other consumers and is damaging to our customers and business.

The Policy is intended to:

- › iterate the principles that underpin our Global Content Standards;
- › provide guidance on our Global Content Standards for people and teams involved in Content creation, development, review, and release in order to ensure that Pearson Content is consistent with the principles of this Policy;
- › aid the development of a critical Content community that contributes to the maturity of Pearson's Content standards and the application of the Policy principles throughout our business;
- › prevent the publication of unintentional errors or inappropriate Content that may be offensive or harmful;
- › document Pearson's stance regarding our Global Content Standards and reinforce our commitment to our principles with external partners and customers.

Pearson is providing this Policy to you, as a Business Partner to whom this Policy applies and as part of our approach to socially responsible procurement. We expect you to confirm that you have read and understood the principles of this Policy via the Policy Orientation module we offer to Business Partners, which helps ensure you are well-informed about Pearson's Global Content Standards and can adhere to these standards in your work with us.

Mandatory and optional courses will be provided to the relevant parties listed above to ensure familiarization and to support their application of the Policy.

Legal, Ethical, and Cultural Sensitivities

It is important to note that the Policy is a set of high-level principles and best practices.

We recognize that local market and division-specific contextualized guidelines and solutions are appropriate in some geographies and regions and may vary by developmental level, learner population(s) or age group(s) to ensure that our Content:

- › complies with local laws or governing policy,
- › is locally appropriate and culturally informed, and
- › considers significant current changes in local contexts that impact learning.

In such cases, care must be taken to ensure that the principles Pearson represents in this document are paramount and that alignment with international standards is maintained.

Where relevant, Pearson Business Leads will provide applicable local guidance to Content partners¹⁰ as needed for contracted projects that fall within this scope.

Digital Formats (Accessibility)

We can only fulfil our goal to help people make progress in their lives through learning and fully apply our principles when all our materials are accessible to all users. Embedding accessibility in our learning materials, development processes, and innovation efforts not only ensures functional access, it also enriches experiences for all.

Digital Formats (Generative Artificial Intelligence)

Partners may not use Generative Artificial Intelligence (AI) tools to create Content for or on behalf of Pearson unless (and only to the extent) expressly stipulated in their contract. If there are areas or manners in which you seek to use Generative AI tools in your work with Pearson that are not expressly provided for in your contract, you must obtain written approval from your Pearson Business Lead and obtain a mutually agreed-upon amendment to your contract.

10. "Content partner" refers to any third-party contributor who provides authoring, writing, reviewing, editing, or researching services directly to Pearson for any Pearson-owned Content released to an external audience.



Section 3:

Adhering to the Policy

Adhering to the Policy

Embedding an ethical, equitable, evidence-based, and inclusive approach demands agility and a culture of active consideration throughout our work practices.

When should the Policy be referred to in the Pearson Content development process?

The short answer is: throughout. At every stage of the Content development process, individuals and teams contributing to the development of Pearson Content should integrate considerations from this Policy.

Planning, development, production, and review practices differ among Content, service, and product teams in different locations, regions, and parts of the business. Practices can also vary in governance depending on the project, the service, or the specific terms outlined in Business Partners' contracts and agreed schedule(s) of work. However, everyone involved in developing Content for Pearson is expected to apply the Policy throughout the creation, review, and publishing or release of Content. This includes employees and Content partners directly involved in this process, regardless of the business unit or team they work for.

Best Practice

The following actions summarize how Content developers can adopt best practices to ensure that the content they produce embeds the principles of the Policy and has our commitment to all learners and other consumers at its center.

1. **Commit:** This action requires personal reflection, examining our biases, and applying evidence-based, equitable, nondiscriminatory, and inclusive design-thinking in any Content we produce.
2. **Research:** Is there a definitive perspective on an issue presented in the Content? What other work in the field might provide insight into this subject? Has best practice in learning science¹¹ been considered? We actively seek diverse perspectives and draw on an array of evidence. Where specific communities are represented, research should include direct engagement with members of the relevant communities to obtain authentic and accurate perspectives.
3. **Engage:** Engage with broader groups to share learning, collaborate, and gain a variety of perspectives, expertise, and insights: learners, educators, instructors, communities, customers, peers, and colleagues.
4. **Examine:** Take a critical approach to exploring the evidence for the concepts we present and how we choose to present these concepts, with consideration and inclusion of the diversity of consumers of the Content.
5. **Develop:** Take the opportunity to continue growing our understanding and remain up-to-date in our area of expertise with an inclusive lens.

As an employer, Pearson is committed to growing an inclusive learning culture for employees and partners that puts the consumer at the center of all we do. We will enable Content contributors to adopt these best practices by building communications, processes, activities, and resources to support this aim.

11. Refer to [Pearson's Learning Design Principles](#) for more information.

Resolving Concerns

Our work is complex. We operate across a vast network, providing an extensive range of Content to suit many audiences across multiple geographies. A culture of continuous improvement, flexibility, and innovation are cornerstones in meeting the needs of learners and the future of learning. We are accountable and trustworthy, and we take concerns regarding the credibility of our Content seriously. We believe that taking in and responding effectively to concerns are strengths, and we welcome feedback that enables us to address concerns regarding Pearson Content, at any stage of the Content development process.

How will I know whether something could conflict with the principles of the Policy in the Content I am working on?

Reflect. Ask yourself the following questions:

- › Is the Content consistent with Pearson's Purpose and Values?
- › Does the Content seem ethical and credible to you and to people who have different identities and life experiences from you?
- › Would you be comfortable reading about the Content in the media?
- › Is the Content respectful and inclusive of people across backgrounds and characteristics?
- › Is the evidence base for the issues presented in the Content clear and verifiable?
- › Could the Content be interpreted by a consumer to perpetuate a bias or stereotype or continue the marginalization of a group of people?
- › Is the Content legal and consistent with our wider policies and Pearson's Code of Conduct?

If you have concerns that the Content you are working on conflicts with the principles of the Policy, please refer such concerns to your Pearson Business Lead. Where you identify a concern with Content and you have no named Pearson liaison, you can instead refer this concern to the Pearson Global Content Standards team directly via this [Query Form](#). The team will investigate and refer potential issues to the appropriate Content team(s).

Whichever way you choose to contact us, please include specific details about the Content in question and your concern, so that we can move to resolve it as quickly as possible.

What if the legality of the content is questioned?

If there is a question about our Content's legality, please get in touch with your Pearson Business Lead directly. As with complaints regarding other deviations from our Policy, Pearson will initiate an internal process with Content leaders, including Content creators, and as required, our legal department will review the Content in the context of the law.

What if a learner, other consumer, or customer identifies a concern or an issue with Content that conflicts with the Policy?

If a learner, other consumer, or customer raises a concern during your engagement with Pearson, you can refer them to the [Pearson Report Bias portal](#).

Courses, Training, and Implementation Support

Pearson provides courses, training, and implementation support for the Policy, including but not limited to:

For employees:

- › Seminars and workshops to inform and train contributors on Pearson Content. Online modules for employees are delivered through our internal training platform and include the following:
 - The Pearson Global Content Policy Course (required for most employees)
 - The Pearson Global Content Policy Resources Course (required for all employees engaging with Pearson Content)
 - The Pearson Fundamentals of Inclusive Content Course (required for all employees engaging with Pearson Content)

For Business Partners:

- › Online and offline learning for Business Partners working with Pearson Content. Online modules are delivered through our external-facing training platform, including:
 - The Pearson Global Content Policy Orientation module (required)
 - The Pearson Fundamentals of Inclusive Content Course (for suppliers identified as Content Partners)

Pearson also supplements this Policy, our courses, and other training with additional resources available to Content contributors. New resources are developed as needed.



To find out more,
visit [Pearson plc](https://www.pearsonplc.com).