



Pearson

Safeguarding Principles

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Pearson has adopted a **Safeguarding Policy** (January 2016) and as part of that policy, we have defined a set of **procedures** to follow when you have concerns as well as guidelines on other issues. The **procedure document** was developed to implement a set of principles that we have adopted to guide our safeguarding approach. We are sharing these underlying principles in this document as they can help guide you through any questions you may have. We also signpost other policies and procedures that are complementary to safeguarding.

Our safeguarding principles

- **Best interests of the learner are paramount** and **shall be the primary consideration** in our decision making.
- **We are learner centred and have adopted a rights based** approach. This helps us keep the rights of students, in particular children and vulnerable adults to care, nurturing and equality of protection sharply in focus in all our activities especially where our work brings us into direct face to face contact.
- **Equality of protection** to ensure that students have the same positive opportunity to use our materials and engage in our activities safely regardless of their gender, ability, race, sexuality, ethnicity, circumstances or age. Vulnerable children and adults require particular attention in order to optimise their safety needs and promote their access to important opportunities.
- **We take responsibility** to meet our obligations regarding our duty of care to all of our students. This means ensuring our products are safe and that we protect children and vulnerable adults across all our business activities and facilities.
- **We reject the use of child or forced labour** in our business activities and in our business relationships.
- **We make clear our standards to contractors and suppliers** and audit those we identify as being high risk.
- **We will take prompt action** where we believe that a child or vulnerable adult is at risk of abuse or harm or has been harmed.
- **We recognise** and acknowledge an element of risk can exist in many learning situations, and while we may never be able to eliminate this completely, we will do all we can to reduce or limit its impact.
- **We are honest and transparent** in our approach and publicly disclose both this Policy and the way we work to try and protect all of our students and in particular children and vulnerable adults. Our marketing, advertising and editorial standards respect and support learner rights.

- **We have a separate policy on confidentiality.** In general, excepting where there is an apparent immediate threat to life or limb, any and all personally identifiable information concerning students should only be shared and handled on a *need to know basis* and where we have the express consent of the data subject for the nominated purpose. Access to the information must be necessary for the conduct of a role relevant to our business. Only individuals who have legitimate reasons to access the information are allowed to receive it.
- **We support and train** those working within Pearson to recognise and respond to student concerns, in particular to concerns in relation to child and vulnerable adult protection risks and incidences.
- **We appoint people to take responsibility** for the protection of children and vulnerable adults
- **We work with others** to protect children and vulnerable adults. This could include law enforcement or child welfare agencies where necessary. We require incidents relevant to this policy in respect of all students to be reported in a timely way both internally and to the appropriate authorities, linked to proper recording of the relevant details.
- **Independent monitoring** of the implementation of the policy is important to us. We have established a group of external advisers to whom we report.

Related policies and procedures

This Policy is complementary to a number of existing policies and practices outlined below. In general, and for the avoidance, of doubt where any reference is made to conduct in the real world then it will apply in the same way in the online world, or as near to it as is reasonably foreseeable and possible.

A. Code of Conduct – General Policy

The Code requires all employees, agents and others working on behalf of Pearson to comply with all applicable laws in all countries where Pearson operates. It also sets out our expected standards of ethical behaviour.

B. Health & Safety – General Policy

Our global policy sets out the responsibilities of business management to assess, monitor and manage risks of personal injury on Pearson premises and our wider business operations.

C. Due Diligence

Depending upon the degree of risk, as determined by country specific risk assessments, human rights due diligence reviews may be needed to review existing or planned operations. Where relevant, such due diligence should also form part of an acquisition process and when establishing a joint venture.

D. Product safety

Pearson is committed to the safety of products used by children or vulnerable adults. Our policy sets out our approach to ensure our products are assessed and tested to eliminate the

use of substances such as lead paint and risks such as choking hazard are designed out and warning labels are used

E. Social Media Guidelines

Our social media guidelines are designed to help everyone at Pearson use social media in a positive, responsible way.

F. Ethical standards in the supply chain - General Policy

This policy provides guidance to Pearson businesses concerning how to consider and manage the risks relating to doing business in low income countries and those with a poor record of protecting labour rights. It describes the standards we set for all our suppliers with respect to labour rights and working conditions, the process we use to assess compliance with those standards and key responsibilities.

G. Global information security - General Policy

This policy sets out the Pearson approach to global data protection and privacy.