Sample Human Rights Strategy

NOT FOR CIRCULATION

Human Rights Engagement Team

Updated: May, 2018

BSR
The Business of a Better World

Human Rights Are Core to [Company]'s Business

Human rights are fundamental to [Company]'s business strategy, mission and 2020 Sustainability Plan.

Material Issues	Values and Behaviors	UN SDGs

Material Issues

- Access
- Affordability
- Data privacy and security
- Competitiveness of digital products
- Security, health and safety
- 21st century skills
- Economic empowerment
- Corporate governance
- GHG emissions and climate change

Values and Behaviors
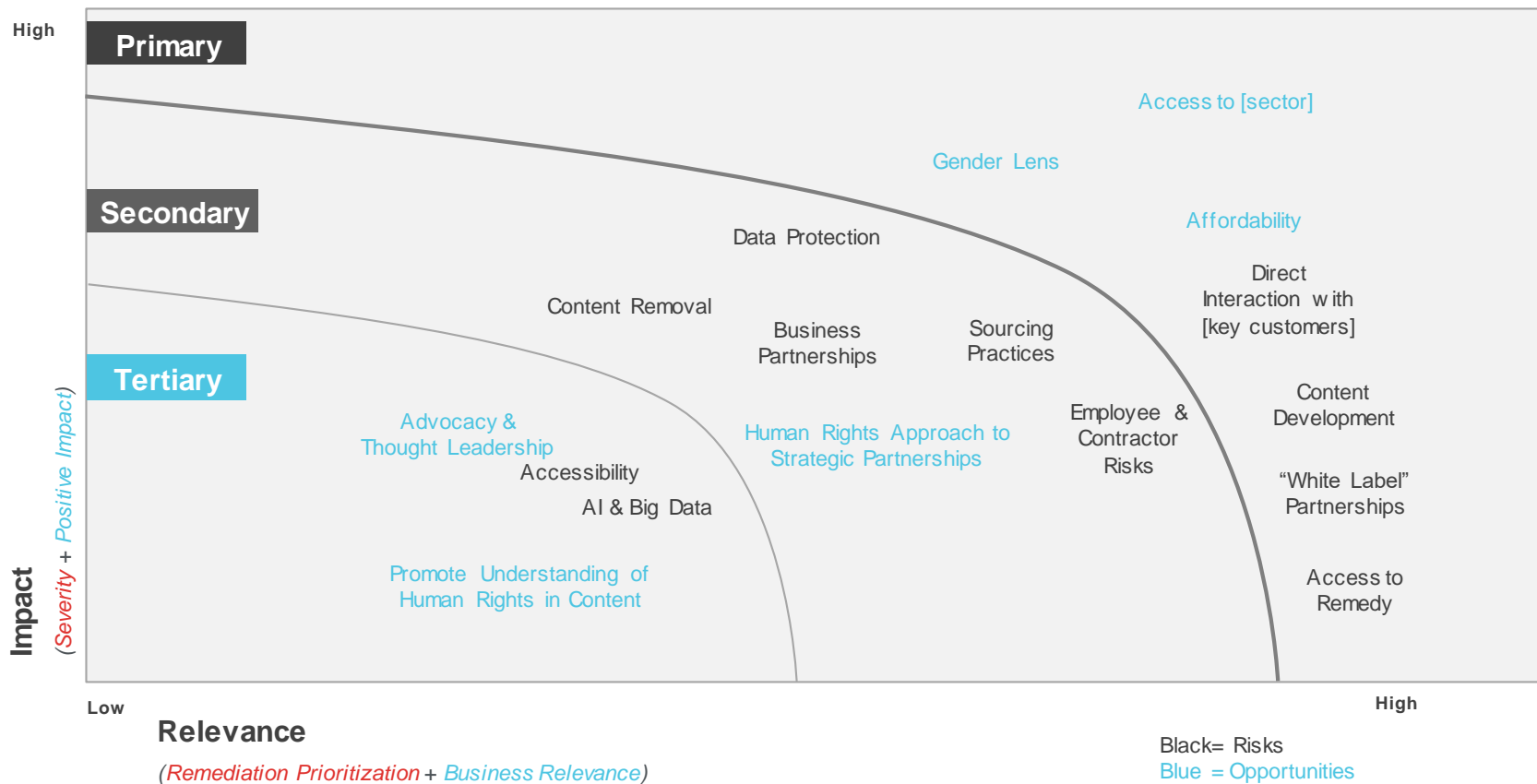
Brave   Imaginative

Decent   Accountable

UN SDGs

4 QUALITY EDUCATION

8 GOOD JOBS AND ECONOMIC GROWTH

10 REDUCED INEQUALITIES

Manage business risks, Protect brand and reputation, Promote innovation, Develop new business opportunities, Engage and attract talent

Human Rights Risk & Opportunities Map

Impact *(Severity + Positive Impact)*

High

Primary

Access to [sector]

Gender Lens

Secondary

Affordability

Data Protection

Direct Interaction with [key customers]

Content Removal

Business Partnerships

Sourcing Practices

Tertiary

Advocacy & Thought Leadership

Accessibility

AI & Big Data

Human Rights Approach to Strategic Partnerships

Employee & Contractor Risks

Content Development

"White Label" Partnerships

Promote Understanding of Human Rights in Content

Access to Remedy

Low

High

Relevance

(Remediation Prioritization + Business Relevance)

Black = Risks
Blue = Opportunities

Human Rights Risks & Opportunities Summary

Black= Risks
Blue = Opportunities

No.	Risk	Description	Priority
1	**Direct Interaction with [key customers]**	Risk that [key customers] may experience discrimination, harassment, or that rights to free religion, speech, and quality [sector] may be at risk	Primary
2	**Content Development**	Risk that [Company] may discriminate against or bias certain groups or individuals, and that right to quality [sectoral] content is at risk	Primary
3	**Access to Remedy**	Lack of consistent availability of grievance mechanisms across the company to non-employees, users, and [key customers]	Primary
4	**University "White Label" Partnerships**	Risk of intentional or unintentional discrimination in developing programs that recruit, admit, and retain students	Primary
5	**Business Partnerships**	Risk that [Company] may be complicit in rights violations committed by business partners, particularly in emerging markets	Secondary
6	**Content Removal**	Risk that content removal as requested by customers negatively impacts right to quality [sector]	Secondary
7	**Employees & Contractors**	Risk that employees and contractors are subject to workplace violations (e.g. harassment, excessive working hours, workplace discrimination)	Secondary
8	**Data Privacy & Information Security**	Risk that customer or employee data may be breached or misused	Secondary
9	**Sourcing Practices**	Risk that labor violations occur within [Company]'s suppliers	Secondary
10	**AI & Big Data**	Risk that new technology will cause discriminatory effects and increase data privacy risk	Tertiary
11	**Accessibility**	Risk that persons with disabilities will not be able to access [Company]'s products	Tertiary

Human Rights Strategy Framework

To respect and promote human rights throughout [Company]'s products, services, operations, employees, contractors and supply chain and fulfill the human right to a quality [sector] by ensuring access and affordability for all [key customers].

Content	Customers	Partnerships	Technology	Employees
• Content Development • Content Removal Requests • Promote Understanding of Human Rights	• Interaction with [key customers] • Access to Remedy • Access to [sector] • Affordability	• White Label Partnerships • Rights Violations by Business Partners • Human Rights Approach	• Data Protection • Artificial Intelligence (AI) and Big Data	• Non-discriminatory and Equal Work Environment (employees and contractors)
Goals & KPIs	Goals & KPIs	Goals & KPIs	Goals & KPIs	Goals & KPIs
Programs	Programs	Programs	Programs	Programs

Program Management

Governance & Accountability

VISION
[Company]'s human rights vision, as articulated in its Human Rights Statement and Human Rights Policy

HUMAN RIGHTS THEMES & PRIORITY TOPICS
The main themes and priority topics where [Company] should focus its strategy to achieve the greatest impact

IMPLEMENTATION
Roadmap actions and KPIs to implement strategy and fulfill [Company]'s human rights vision

PROGRAM MANAGEMENT
Business and function leaders own and implement programs with support from Sustainability team

GOVERNANCE
Senior business and function leads oversee and ensure accountability for strategy and implementation

From Strategy → Implementation

We prioritized [Company]'s human rights risks and opportunities and developed an implementation plan that factors in key business priorities, processes and capabilities.

Human Rights Risks & Opportunities

- **Risks:** Prioritized on a combination of the severity of the impact to rights-holders + the ability of the company to provide a remedy.
- **Opportunities:** Prioritized on a combination of the positive impact and relevance to the business.

Business Linkage

- **Business Priorities:** Learner/consumer focus, Digital transformation, US HigherEd, Online learning and programs
- **ERM Factors:** Financial, Reputational, Strategic, Operational

Capabilities and Resources

- **Capabilities:** Opportunity to leverage existing programs, processes, management/governance structures, policies and partnerships
- **Resources:** Headcount, time, financial investment by business owners and sustainability team

Implementation Priorities (2018-2019)

Plan includes high priority projects across functions and geographies.

	Action	Market	Owner	Sustainability
Content	• Track and report on content development issues. • Develop process to collect and leverage feedback from [key customers] and customers.	• Global • NA Higher Ed, Schools	• EdPolicy Team, Sustainability (both)	• Advise • Co-Lead
[key customers]	• Strengthen protections and grievance processes for direct interactions with [key customers]. • Identify and promote opportunities to improve access and affordability for under-served [key customers].	• OBL, VUE, Growth, PALF • NA Higher Ed	• Safeguarding • Sustainability, Global Product, N. America	• Advise • Co-lead
Partnerships	• Develop and pilot due diligence process for 'white label' and high risk partnerships. • Address high risk supply chain and sourcing issues. Develop sourcing program.	• OPM, OBL, Growth • Global	• Audit, Risk & Compliance • Global Sourcing & Supply Chain	• Advise • Advise
Technology	• Develop policy for responding to government requests for learner and employee data. • Develop and pilot tool to integrate human rights filters into [Company] product lifecycle.	• Global • Higher Ed	• Data Privacy • G. Product, Technology, Sustainability	• Inform • Advise
Employees	• Strengthen practices for contract workers. • Improve data, reporting on diversity and pay equity.	• Priority markets • Priority markets	• HR, Corporate Security • HR, D&I	• Inform • Advise

Aspirations for 2020+

[Company] should aim high on human rights to promote innovation and growth and build its reputation/brand as an inclusive leader in advancing high quality [sector].

Content
- Advance human rights and sustainable development through core products and services (e.g., courseware, qualifications, online programs).

[key customers]
- Democratize effective, affordable learning solutions that empower vulnerable [key customers] across all [Company] business lines and geographies.

Partnerships
- Influence business partners across [Company]'s value chain to advance human rights and sustainable development.
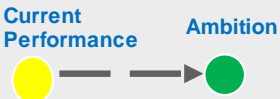
Technology
- Leverage AI and big data to maximize personalized learning outcomes and career opportunities for [key customers] from all backgrounds.

Employees
- Provide equal pay and opportunities for a diverse workforce that is representative of its [key customers] and promotes innovation, growth and inclusion.

Sample Action Plan: Issue 1

Goal	*Ensure content developed and published by [Company] meets the human right to [sector]*	**Ambition**
Key Benefits	Minimize reputation and brand risks; ensure [key customers] are protected from discriminatory or sub-standard content	
Topic Owner(s)	Global Product (Editorial Policy SteerCo), BUs and Geographies	
Potential KPIs	• % of content developers and reviewers trained on [Company] Editorial Policy • # of editorial issues identified and % resolved during content development • % of content in compliance with editorial and human rights policies • # of external editorial issues reported to [Company] and % addressed	

Current Performance → Ambition

🔴 *Compliance/lagging*
🟡 *Lagging-Industry Average*
🟠 *Good Practice*
🔵 *Leadership*

Short-Term Actions (2018-19)

1. **Train key departments on [Company] Editorial Policy requirements** to create consistency in understanding and application of these standards and establish the connection with the right to a quality [sector].

2. **Track incidents related to discriminatory content** and set targets to reduce the number of incidents over time.

3. **Develop and pilot feedback process** to collect and share feedback from [key customers] and customers on appropriate and inclusive content with Global Product team.

Longer-Term Actions (2020+)

1. **Add bias and sensitivity filters** for existing Assessment questions (and other business units where applicable).

2. **Develop and implement automated AI-based** methods to cost-effectively review full texts for bias/discrimination and compliance with editorial and human rights policies.

Sample Action Plan: Issue 2

Goal	*Develop systems to understand and address human rights implications of new technologies*	Ambition
Key Benefits	Mitigate human rights impacts on [key customers], employees and other stakeholders of new technologies	
Topic Owner(s)	Technology, Data Privacy & Information Security, Corporate Security	
Potential KPIs	• % of products and services screened and monitored for human rights and ethics issues potentially arising from AI • # (inc. type, severity) of incidents of unintended discrimination or bias resulting from AI and % resolved	

Ambition

Current Performance → Ambition

🔴 *Compliance/lagging*
🟡 *Lagging-Industry Average*
🟠 *Good Practice*
🟢 *Leadership*

Short-Term Actions (2018-19)	Longer-Term Actions (2020+)
1. **Conduct a rapid human rights assessment of big data and AI platforms** to understand whether there are negative human rights impacts of existing tech systems. 2. **Develop human rights assessment criteria for new digital products** so that each new product or service that involves new/advanced big data analytics or artificial intelligence is screened before implementation.	1. **Conduct long-term study on AI systems in [sector]** to understand long-term implications of these systems on [key customers] and outcomes. The focus here should be the impact on [key customers] of allowing AI to replace educators in certain decision-making processes. 2. **Develop Code of Ethics for Advanced Computing and Data Science Lab** to embed findings from long-term action item one, above into [Company]'s overall approach to advanced computing and data science.

Sample Action Plan: Issue 3

Goal	*Minimize risk of discrimination for employees and contractors*	Ambition
Key Benefits	Minimize risks of discrimination and other human rights issues; recruit, retain and develop diverse, high-performing talent; protect reputation/brand; comply with GRI reporting guidelines	**Current Performance** → **Ambition** 🔴 Compliance/lagging 🟡 Lagging-Industry 🟠 Average 🟢 Good Practice Leadership
Topic Owner(s)	Diversity & Inclusion, Corporate Security, Human Resources	
Potential KPIs	• % of women, minorities across levels, functions, BUs, markets • % pay differential for women and minorities across job functions • # of harassment, discrimination grievances and % resolved (with narrative around baseline numbers, e.g. more training may lead to more grievances) • HR KPIs broken out for contract workers • Employee survey data broken out for women, minorities, contract workers	

Short-Term Actions (2018-19)	**Longer-Term Actions (2020+)**
1. **Map, assess and report on practices for contract workers** to evaluate alignment with legal requirements, employee treatment and good practices. Focus on countries where contractors are not hired directly by [Company] (e.g., U.S.) and countries with fewer protections. 2. **Improve data, KPIs and reporting on diversity and pay equity** across BUs, markets, job levels and functions. Prioritize areas with large numbers of employees, under-performance and higher risk of discrimination and unequal treatment. Expand gender pay gap analysis beyond U.K. to U.S. and other countries.	1. **Establish and report on progress toward long-term diversity targets** by level, function, BU and Geo, with a focus on vulnerable populations by market. 2. **Develop employee support groups for high risk markets** and vulnerable demographics (i.e., LGBTQ employees in Saudi Arabia). Where possible, take a public stance in support of the rights of such groups. 3. **Establish and report on pay equality for all [Company] employees globally** as soon as possible, targeting 2022 or earlier.