



# Social Media Acceptable Use Policy

## **Business Area:**

Product Customer & External Relations

**Version:** 2.1

**Document Reference:** POL-19-125

# Document Control

Status: Live

## Document Version History

Date	Version	Author	Comments
	V0.7	Lesley Raybould	Initial Draft and amendments following consultation with Legal and Compliance, Counter Fraud Services, Corporate communications, Customer Communications and Marketing, Operations.
	V0.8	Yvonne Dunne	Minor amendments following consultation with People@SLC
	V0.9	Lesley Raybould	Minor amendments following discussion with Madeleine Firth
	V1.0	Lesley Raybould	Final comments from David Wallace
	V1.1	Lesley Raybould	Amendments following discussion with ELT
11/5/2021	V2.0	Claire McGhee, Adam Treslove, Steven Darling	Updated in line with review cycle
13/06/2022	V2.1	Adam Treslove	Annual review. Addition of section 4 Risk Appetite Alignment. Amendments to sections 5,6 and 8.

## Review and Approval Register

**Note:** RACI = R- Responsible, A- Accountable, C-Consulted, I-Informed

Name	Position	RACI Role
David Wallace	Deputy CEO & Chief Customer Officer	A
Gary Womersley	Company Secretary	Governance Approval
Claire McGhee	Head of Customer Communications and Marketing	C
Adam Treslove	Head of Corporate Affairs	R
Steven Darling	Customer Experience SRO	C
Gillian Walker	Head of HR Service Delivery	C
Kevin O'Connor	Head of Repayment and Customer Compliance	C
Jackie Currie	Operations	C
Madeleine Firth	External Affairs Manager	C
People@SLC	Business Partners -People	C
VSSG	Vulnerable Students Stakeholder Group	I
PCS	Recognised Trade Union	C
SMT	Senior Management Team	C

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ELT	Executive Leadership Team	C
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### Update Schedule

This document will be reviewed at least annually or whenever business requirements, legislation, regulations change.

### Applicability

The requirements in this document apply to all permanent, temporary and contract workers employed or engaged by SLC or any third-party organisations whilst at work or engaged on SLC business.

### Compliance

Any employee found to have violated these requirements could be subject to disciplinary action, up to and including termination of employment.

At its sole discretion, SLC may require the removal from the service provision account any employee of a third-party organisation contractually engaged on SLC business who is found to have violated these Procedure requirements.

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# 1 Policy brief & purpose

- 1.1.1 Our Social Media Acceptable Use Policy provides a framework for using social media. Social media is a place where people exchange information, opinions and experiences to learn, develop and access services. It has become a powerful and useful tool for helping customers navigate each stage of the Student Finance process: Think, Apply, Assess, Pay, Repay.
- 1.1.2 Social media is used by SLC and its audiences in both a business and personal capacity.
- 1.1.3 The purpose of this policy is to explain how SLC employees should use social media and sets out the standards of behaviour expected from employees, customers and third parties. It will be published on SLC's public web pages as well as promoted and discussed internally with staff.

## 2 Scope

### 2.1 Policy Definitions

- 2.1.1 "Social media" refers to a variety of online communities e.g., blogs, social networks, chat rooms and forums. This policy covers all of these.
- 2.1.2 "User" refers to employees within SLC who use social media in a professional or personal capacity, as well as the public audiences of these channels.
- 2.1.3 "Customer" refers to a public follower or user of SLC's channels, either as a potential student, student, sponsor, repayer, or any other interested audience member.

## 3 Policy Principles

- 3.1.1 SLC aims to offer an efficient, high standard of service and maintain transparency in our customer service, assessment, repayment and decision-making processes.
- 3.1.2 We expect employees to act carefully and responsibly to protect our company's image and reputation.
- 3.1.3 Employees should follow our confidentiality policy and data protection policy. These policies form part of mandatory training for all employees.
- 3.1.4 All employees are expected to display courtesy and respect to our customers.
- 3.1.5 It is recognised under and in terms of the Human Rights Act 1998, Schedule 1, Part 1, Article 8 that:
- *everyone has the right to respect for their private and family life, home and correspondence; and*

- *there shall be no interference by a public authority with the exercise of this right except such as is in accordance with the law and is necessary in a democratic society in the interests of national security, public safety or the economic well-being of the country, for the prevention of disorder or crime, for the protection of health or morals, or for the protection of the rights and freedoms of others.*

## 4 Risk Appetite Alignment

- 4.1.1 The requirements outlined within the Social Media Acceptable Use Policy support mitigation of a number of risk categories, predominantly addressing the Operations (Product, Process, Customer; Failure to fulfil duty to customers) and Reputational risk categories.
- 4.1.2 Compliance with policy requirements ensures SLC continues to operate within its risk category which is:
- **Cautious** to any risks related to the overall level of service provided to customers in line with performance agreement.
  - SLC has appetite to take decisions with potential to expose the organisation to additional scrutiny but only where appropriate steps are taken to minimise exposure. This is reflective of **Open** approach.

## 5 Employees using social media for business

### 5.1 Guidance for all employees using social media for business

- 5.1.1 This policy should be read alongside the Company's internet use, data protection and acceptable use policies, which are particularly relevant to staff using social media.
- 5.1.2 Users must not:
- Create or transmit material that might be **defamatory or incur liability** for the company. Staff using social media for business purposes will be given clear guidance on what this means.
  - Post messages, status updates or links to material or content that is inappropriate.
    - Inappropriate content includes: pornography, racial or religious slurs, gender-specific comments, information encouraging criminal skills or terrorism, or materials relating to cults, gambling or illegal drugs.
    - This definition of inappropriate content or material also covers any text, images or other media that could reasonably offend someone on the basis of race, age, sex, religious or political belief, national origin, disability, sexual orientation or any other characteristic protected by law.
  - Use social media for any **illegal or criminal activities**.
  - Send **offensive or harassing material** to others via social media.
  - Broadcast **unsolicited views** on social, political, religious or other non-business-related matters.

- Use social media for **advertising or endorsement** purposes.
- Send or post messages or material that **could damage SLC's image or reputation – this extends to commenting on or reposting of others content.**
- Discuss **colleagues, customers or suppliers** without their approval.
- Reveal any personal or identifying information of customers, suppliers, stakeholders or colleagues
- Post, upload, forward or link **spam, junk email, chain emails and messages.**

## 5.2 Representing SLC on social media

5.2.1 In general, employees must only post updates, messages or otherwise use these accounts in line with the company's objectives. For instance, employees may use SLC social media accounts to:

- Respond to customer enquiries and requests for help.
- Share blog posts, articles and other content created by the company.
- Share insightful articles, videos, media and other content relevant to the business, but created by others.
- Provide followers with an insight into what happens within the company.
- Post job opportunities, articles and information about SLC as an employer.
- Support new product launches and other initiatives.
- Publish government announcements.

5.2.2 Increasingly, customers use social media channels to seek information, guidance, raise concerns or generally comment. Some employees roles need them to represent our company by monitoring, responding to and reporting on these and in the handling of social media accounts or posting on SLC's behalf, we expect them to act carefully and responsibly to protect our company's security, image and reputation, and in conjunction with SLC's Style Guide, Tone of Voice and any other relevant guidance.

5.2.3 SLC's social media users must:

- Remember they are dealing with real people and be respectful, polite and patient when engaging in conversations on SLC's behalf.
- Be empathetic and think of how you would feel if you were on the receiving end of any message or interaction.
- Recognise that while social media activity may be between them and an individual, the power of social media lies in the ability to share; always pause and think before you post.
- Remove offensive content as quickly as possible.
- Correct any misleading or false content as quickly as possible.
- Refrain from engaging in debate or dispute about student finance policy and legislation
- Report any misuse or abuse online to ensure the necessary steps are taken to address this
- Not speak on matters outside their field of expertise.
- Not post discriminatory, offensive or libellous content and commentary.

- 5.2.4 Only staff who have been authorised to use the company’s social networking accounts may do so. Authorisation would only be granted by the relevant manager with the agreement of the Editorial Board. Authorisation will only be given when social media tasks form a core part of the employee’s role. Allowing only designated people to use these accounts ensures the company’s social media presence is consistent and cohesive.
- 5.2.5 Employees must not make any kind of personal attack or tasteless or offensive remarks to individuals or groups.
- 5.2.6 Employees who have been contacted by journalists via social media must refer such enquiries to the Corporate Affairs team.
- 5.2.7 Employees must not interact with customers in a business capacity using their personal social media accounts.
- 5.2.8 Customer facing social media channels and new social media accounts directed at customers must not be created for any of our service brands – SFE, SFni, SFW or SLC Repay unless authorised by SLC’s Editorial Board in line with agreed communications strategy. The company operates its social media policy presence in line with its communications strategy that focuses on the most appropriate social networks, in keeping with our business and given available resource. To avoid confusion there should be no more than one account on each platform for each service brand. Periodic audits will be carried out to ensure no unauthorised accounts have been established in the name of SLC or any of its service brands.
- 5.2.9 Corporate social media channels and new social media accounts directed at stakeholders and our corporate audience must not be created unless authorised by the Head of Corporate Affairs in line with the Communications Strategy.

### 5.3 Pre-Election Period

- 5.3.1 When representing SLC on social media, employees must not comment on government policies and practices. They should also not comment on politically controversial issues. This also applies to other activity such as surveys, service promotion and discussions.
- 5.3.2 This guidance applies at all times, but additional guidance will be supplied, and should be read in conjunction with this policy, during any pre-election period, or in the lead up to a Referendum. The pre-election period is the term used to describe the period between the time an election is announced and the date the election is held. Civil and Public servants are given official guidance by the Cabinet Office on the rules they must follow in relation to Government business during this time. If there is any doubt about whether an action is appropriate, users should not take it and seek guidance from their manager.

### 5.4 Using social media to access customers’ publicly available information



- 5.4.1 SLC's Data Protection Statement/Privacy Notice sets out how students' personal information is processed and used by the company. This statement is provided to all students upon completion of their application for finance. Part of these Terms and Conditions allows SLC to use personal information for the purposes of 'detecting, investigating and preventing crime, including fraud'.
- 5.4.2 SLC investigates different types of potential fraud which can be referred from a number of sources, including but not exclusive to:
- Customer Compliance Analyst, who constantly monitor application data for fraud indicators and/or trends.
  - Assessment staff, in the course of processing applications.
  - Concerned members of the public, who believe they have information about fraud being perpetrated in the student finance system.
  - External fraud prevention and detection databases.
- 5.4.3 When an investigation is opened, a process is followed by investigators which, depending on the nature of the case, may include the accessing of publicly available information using SLC branded social media accounts, including the public social media accounts in the student's and/or sponsor('s') names. Publicly available information is not routinely used in investigations and would only be accessed under exceptional circumstances with prior agreement of the Senior Responsible Manager.
- 5.4.4 The review of social media accounts can support the work of investigators by offering additional information on relationships among people, places, locations, accounts or any other entity. This information may then allow investigators to challenge any inconsistencies identified during the assess, pay and repay processes.
- 5.4.5 SLC will never make an assessment decision solely on the basis of information located on social media. The information gleaned from social media must always be corroborated by additional evidence.
- 5.4.6 Unacceptable activity includes, but is not limited to:
- The ongoing monitoring of any customer's online activity following conclusion of an investigation.
  - Connecting with customers using social media as part of an investigation.
  - Applying any opinions such as 'likes', or sharing on content found on customers', or 3<sup>rd</sup> parties accounts.
  - Establishing or using false or pseudo accounts for this or any other purpose.
- 5.4.7 SLC will at all times utilise social media in the discharge of their function on a lawful basis to detect and prevent fraud and as is necessary to protect the economic well-

being of both SLC's customer base and the taxpayer at large and to protect the rights and freedoms of others.

- 5.4.8 Use of social media in this way will at all times be relevant, proportionate, reasonable and not excessive. SLC will not engage in acts of deception, entrapment or enticement when gathering evidence from social media sources.

## 6 Employees' use of personal social media

- 6.1.1 SLC does not prohibit employees from accessing their personal accounts at work. Colleagues are expected to act responsibly and ensure their productivity is not affected. Using personal social media excessively while at work can reduce efficiency and concentration and must therefore be restricted to break periods.
- 6.1.2 Whilst SLC staff have a right to a private life and freedom of expression, as public servants all employees must avoid making any comment on their personal social media accounts which is likely to harm the security or reputation of the Company. This applies to commentary on Government policy, services or directly on SLC as an employer. Failure to do so could lead to disciplinary action.
- 6.1.3 Additionally, where an employee's personal social media profiles identify their association with SLC, care must be taken when posting content whilst on Company business, travelling out of hours or socialising on a business-related event or trip.

## 7 Monitoring use of Social Media

- 7.1.1 SLC IT and internet resources – including computers, smart phones and internet connections are provided for legitimate business use. SLC will therefore monitor how social networks are used and accessed through these resources.
- 7.1.2 Any such monitoring or examination will only be carried out by authorised staff.
- 7.1.3 All data relating to social networks written, sent or received through SLC systems is part of official company records. The company can be legally compelled to show information to law enforcement agencies or other parties.
- 7.1.4 Examples of non-conformity with the employee social media policy include but are not limited to:
- Disregarding job responsibilities and deadlines to use social media.
  - Disclosing confidential or proprietary information through personal or business accounts.
  - Directing offensive comments towards other members of the online community.

## 8 Customer use of SLC Social Media channels

- 8.1.1 We are committed to protecting and respecting our customers' privacy. By using our social media channels, they agree to our Social Media Policy, which is published on SLC's customer facing websites and social media channels.
- 8.1.2 SLC has a duty of care towards staff and this includes their interactions with customers on our social media channels.
- 8.1.3 The social media channels of SLC, its service brands (SFE, SFW and SFni) and SLC Repayment are intended as a source of information for the general public. Our corporate social media channels are primarily intended as a source of information for our stakeholder audiences, however for specific activities e.g. Employer of Choice, the general public may be an audience. We strive to offer useful information about our products and services, and to provide interesting and useful content for current and past students, parents and anyone interested in student finance.
- 8.1.4 In order to keep this environment open and friendly, we have established the following guidelines:
- All customer users of the Company's You Tube channels, LinkedIn, Facebook, Twitter and Instagram (this is not an exhaustive list as new channels are being added on an ongoing basis) pages agree to comply with the channels' Terms of Service, which they sign up to upon registration on that channel. Additionally, the opinions and content posted to our page by other users do not necessarily reflect the opinions of SFE, SFW or their parent company, the Student Loans Company Limited.
  - Any commentary posted should be relevant and respectful to SFE, SFW, SLC and its community. We reserve the right to remove any content that we deem unacceptable, and to block and report any customer who repeatedly violates these terms.
- 8.1.5 Unacceptable activity includes, but is not limited to:
- Making comments which SLC deem abusive, offensive, obscene, vulgar or violent.
  - Abusing, threatening, stalking, harassing or in any way attacking other users on the platforms.
  - Posting any content that is offensive or derogatory toward others in regard to race/ethnicity, religion, gender, nationality or political beliefs.
  - Using any language or content that is disruptive, repetitive, misleading, deceptive, unlawful or fraudulent.
  - Trolling.
  - Commercial solicitation.
  - Uploading or attaching files that contain viruses, corrupted files, or any other similar software or programs that may damage the operation or compromise the security of computers and networks.
  - Violations of intellectual property rights.
- 8.1.6 We encourage all customers to take an active role in protecting their personal privacy. Publicly posting information about their student finance or online account

(for example, Customer Reference Numbers) can increase the risk of online fraudsters and phishing scams. SLC will never ask for information about personal details in an email, text or unsolicited social media message. Please report any suspected phishing attempt to our Counter Fraud Service at [phishing@slc.co.uk](mailto:phishing@slc.co.uk)

8.1.7 Customers with personal or account-specific questions can message SLC privately. They will be prompted to consent to a discussion on Facebook Messenger or by Twitter Direct Message. Be advised that our security policy prohibits us from viewing images and files sent through Facebook Messenger and Twitter direct messages.

8.1.8 SLC reserve the right to modify or change these conditions at any time.

## 9 Compliance with this Policy

9.1.1 All users and customers must comply with the social media platform's Terms of Use as well as this policy.

9.1.2 Any employee found to have violated this policy will be subject to disciplinary action, up to and including termination of employment.

9.1.3 We will remove, block, report or ban any user or customer who:

- encourages others to post unacceptable content
- uses offensive images as their profile picture
- has an offensive username

## 10 Related documents

This document forms an essential part of SLC's overall policy framework and should be read in accordance with relevant related documents, including:

Document Description
SLC Data Protection Statement/Privacy Notice
<a href="#">Acceptable Use Policy</a>
<a href="#">Data Protection Policy</a>
<a href="#">Employee Privacy Notice</a>
<a href="#">Applicants Privacy Notice</a>