

Fox Group FM Social Media Platforms Policy

Policy brief & purpose

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.

Social media is used by Fox Group solely as a business platform and our audience may have separate personal accounts.

The purpose of this policy is to explain how Fox Group employees should use social media and sets out the standards of behaviour expected from employees, customers and third parties. It will be published on Fox Group's public web pages as well as promoted and discussed internally with staff.

Scope

Policy definitions:

- "Social media" refers to a variety of online communities e.g. blogs, social networks, chat rooms and forums. This policy covers all of these.
- "User" refers to employees within Fox Group who use social media in a professional or personal capacity, as well as the public audiences of these channels.
- "Customer" refers to a public follower of fox Group's channels, either as a potential client or current client.

Policy Principles

Fox Group aims to offer an efficient, high standard of service and maintain transparency in our customer service, assessment and decision-making processes.

We expect employees to act carefully and responsibly to protect our company's image and reputation.

Employees should follow our confidentiality policy and data protection policy. These policies form part of mandatory training for all employees.

All employees are expected to display courtesy and respect to our customers.

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.

Employees using social media for business

Guidance for all employees using social media for business

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.

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.
 - o 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.
 - o 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 Fox Group's image or reputation. Discuss colleagues, customers or suppliers without their approval.
- Post, upload, forward or link spam, junk email, chain emails and messages.

Representing Fox Group on social media

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 Fox Group 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 Fox Group as an employer (LinkedIn).
- Support new product launches and other initiatives.
- Publish government announcements.
- Some employees represent our company by handling social media accounts or posting on Fox Group's behalf. We expect them to act carefully and responsibly to protect our company's security, image and reputation, and in conjunction with Fox Group's Style Guide.

Users must:

- Be respectful, polite and patient, when engaging in conversations on Fox Group's behalf.

- Not speak on matters outside their field of expertise.
- Not post discriminatory, offensive or libellous content and commentary.
- Remove offensive content as quickly as possible.
- Correct any misleading or false content as quickly as possible.
- Ensure all content is grammatically correct and spell checked. Only showing high standard photos.

ALL posts must be previewed through the Head Office before posting to ensure all content is relevant and portrays a high standard when representing the Company.

Only people who have been authorised to use the company's social networking accounts may do so. Authorisation would only be granted by the Fox Group Social Media Management team. It is allocated when social media tasks form a core part of the role of the employee. Allowing only designated people to use these accounts ensures the company's social media presence is consistent and cohesive.

Employees must not make any kind of personal attack or tasteless or offensive remarks to individuals or groups.

Employees who have been contacted by journalists via social media must refer such enquiries to Fox Group Head Office team.

Employees must not interact with customers in a business capacity using their personal social media accounts.

New social media accounts must not be created in the company's name unless authorised by the Fox Group Social Media Management team. The company operates its social media policy presence in line with a strategy that focuses on the most appropriate social networks, in keeping with our business, given available resource. There should be no more than one account on each platform for each service brand in order to avoid confusion. Periodic audits will be carried out to ensure no unauthorised accounts have been established in the name of Fox Group or any of its service brands.

Fox Group owns all content and followers.

Using social media to access customers 'publicly available information

Fox Group'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 Fox Group to use personal information for the purposes of 'detecting, investigating and preventing crime, including fraud'.

Fox Group investigates different types of potential fraud which can be referred from a number of sources, including but not exclusive to:

- Counter Fraud analysts, 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.

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 Fox Group branded social media accounts, including the public social media accounts in the student's and/or sponsor('s') names.

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.

Fox Group 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.

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 3rd parties accounts.
- Establishing or using false or pseudo accounts for this or any other purpose.
- Fox Group 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 Fox Group's customer base and the taxpayer at large and to protect the rights and freedoms of others.
- Use of social media in this way will at all times be relevant, proportionate, reasonable and not excessive. Fox Group will not engage in acts of deception, entrapment or enticement when gathering evidence from social media sources.

Employees 'use of personal social media

- Fox Group allows employees to access their personal accounts at work. We expect them 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.
- Whilst Fox Group staff have a right to a private life and freedom of expression, all employees must avoid making any comment on their personal socials public 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 Fox Group as an employer.

Additionally, where an employee's personal social media profiles identify their association with Fox Group, care must be taken when posting content whilst on Company business, travelling out of hours or socialising on a business related event or trip.

Monitoring use of Social Media

Fox Group IT and internet resources – including computers, smart phones and internet connections are provided for legitimate business use. Fox Group will therefore monitor how social networks are used and accessed through these resources.

Any such monitoring or examination will only be carried out by authorised staff.

All data relating to social networks written, sent or received through Fox Group systems is part of official company records. The company can be legally compelled to show information to law enforcement agencies or other parties.

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.

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 Fox Group's customer facing websites and social media channels.

Fox Group has a duty of care towards our staff and this includes their interactions with customers on our social media channels.

The social media channels of Fox Group, is a source of information for the general public, and as a place for the public to ask questions about Fox Group. We strive to offer useful information about our products and services, and to provide interesting and useful content for current and past projects

In order to keep this environment open and friendly, we have established the following guidelines:

Customer use of Fox Group Social Media channels

Any commentary posted should be relevant and respectful to Fox Group 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.

Unacceptable activity includes, but is not limited to:

- Making comments which Fox Group 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.

We encourage all customers to take an active role in protecting their personal privacy. Publicly posting information about Fox Group or online account (for example, Customer Reference Numbers) can increase the risk of online predators and phishing scams. Fox Group will never ask for information about personal details in an email, text or unsolicited social media message.

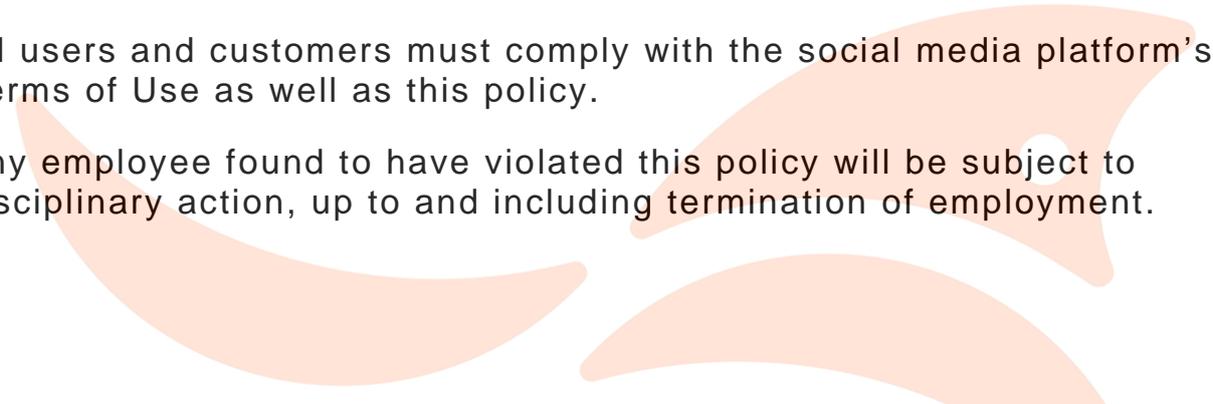
Customers with personal or account-specific questions can message Fox Group privately. They will be prompted to consent to a discussion on Facebook Messenger, by Twitter Direct Message or Direct Message by Instagram. Be advised that our security policy prohibits us from viewing images and files sent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

Fox Group reserve the right to modify or change these conditions at any time.

Compliance with this Policy

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

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



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 user name

I have read the contents of the policy and I agree with the full documentation.

Name:

Signature:

Date: