

Social Media Policy



Uttar Bihar Gramin Bank

UTTAR BIHAR GRAMIN BANK

HEAD OFFICE, KALAMBAGH CHOWK

MUZAFFARPUR- 842001

SOCIAL MEDIA POLICY

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1. POLICY STATEMENT

Uttar Bihar Gramin Bank will utilize social media platforms such as Facebook, Twitter, Blogs, YouTube, Instagram, LinkedIn etc. for marketing, branding and publicity about the Bank and the products & services offered by the bank. Policy is aimed at defining the framework for the Bank and its staff for getting intended outcome through use of Social media platform.

2. BACKGROUND

Use of Social Media platform is growing among Institutions as well as individuals. It has given us opportunity to connect and communicate effectively with large number of customers present at Social Media Platform.

Uttar Bihar Gramin Bank is a custodian of public money and public trust as well as custodian of confidential corporate & personal financial data pertaining to its customers.

The Bank, its executives and employees has certain responsibilities, namely not to act in a manner:

- which will cause loss of confidence of stakeholders, or
- take any action or make statements which can cause regulatory or judicial disapproval, or
- which erodes the brand image of the Bank

With the rise of social media as a communication platform, the way in which employee, of organizations communicate internally, externally as well as online, continues to evolve. While this creates new opportunities for communication and collaboration, it also creates larger responsibilities for the employees. It is important that the employees adhere to rules of conduct, both in their professional and personal sphere, where their communication in any form could have an impact on the reputation of the Bank.

3. NEED FOR SOCIAL MEDIA POLICY

There are risks associated with communications on the social media platform in the form of:

- unauthorized transfer of data and information,
- unauthorized opinions which may be construed as the opinions of the Bank rather than the employee,
- access to or presence on websites that are disreputable, etc.

Also, articulating in writing or through specific comments or views about the strategy, policies or working environment of the Bank by an employee can have a potential to be misused or misunderstood or even constitute a breach of banking secrecy.

Separately, employees of the Banks are not expected to articulate their personal grievances in public, especially when the Bank has provided for adequate internal grievance mechanism i.e. code of conduct, gender neutral policy as well as whistle blowing mechanism through which the Bank has instituted an independent Committee of the Board to ensure that the mechanism is working effectively.

At the same time, the Bank recognizes the employees' freedom of free speech and expression (including to tweet, update and blog in the social media space).

There is thus a need for a clearly outlined policy which takes care of the employee's freedom while at the same time addressing the concerns of the Bank and its wider stakeholders.

4. DEFINITION OF SOCIAL MEDIA

Social media is the term commonly given to websites and applications on the Internet, which allow users to interact with each other by sharing information, opinions, knowledge and interests. As the name implies, social media involves the building of communities or networks, encouraging participation and engagement on the Internet.

Some examples of social media are sites such as Facebook, Twitter, YouTube, Instagram, LinkedIn, WhatsApp and other such apps, discussion forums like Yahoo! and Google Groups, blogs and sites where information can be posted freely such as Wikipedia. When posting media content to social networking sites it is helpful to remember the reasons for doing so. While using the Uttar Bihar Gramin Bank's social sites, the aims should be to:

- Promote the Uttar Bihar Gramin Bank's mission
- Reach a wider, more diverse audience
- Educate, inform and entertain
- Endorse scientific research for professionals and the community
- Promote debate with a view to finding solutions
- Consider alternative viewpoints
- Promote events and exhibitions
- Learn about the community and its needs

5. SCOPE AND INTENDED AUDIENCE

This Policy impacts upon Bank's work practices for all those who:

- use social media;
- have access to social media data;
- have any other responsibility(s) as regards corporate communication, press release;
- have management responsibility(s) for the staff engaged in any of these activities; or manage, or have design input into information technology infrastructure;
- are rendering services outsourced by the Bank.

The Policy, therefore, applies to all staff members of our Bank and covers all information regardless of format, medium or age.

6. ROLES AND RESPONSIBILITIES

6.1 OVERALL IN-CHARGE

- The General Manager Operation shall be overall in-charge for the social media policy of Uttar Bihar Gramin Bank;
- Planning and Development department shall work as focal point for the social media. The General Manager Operation shall be committed to enhance accountability, transparency and improvement of service delivery by ensuring that sound social media policy is implemented and maintained;
- Chief Manager - IT shall support the implementation of this Policy and ensure that each staff member supports the values underlying in this Policy;
 - i. To have the maker & checker concept in place for risk mitigation, a team of minimum two officers shall undertake the work of social media activity. Roles and responsibilities of persons handling Social Media Marketing activities will be assigned from time to time, based on the number of allocated human and other resources.
 - ii. Chief Manager -IT shall make interventions as are necessary to ensure that the social media policy comply with the best practices in vogue.
 - iii. Planning and Development department shall ensure that negative viral on social media is arrested at the earliest. A negative viral post is the content that has been shared swiftly across wide audience on our social platform affecting the reputation of the bank adversely. Department shall ensure that necessary tools and practices are adopted & followed to maintain the social site. Necessary tools and practices may include use of software based monitoring tool and blocking the users who share defamatory contents.

6.2 LEGAL DEPARTMENT & COMPLIANCE

The Planning and Development Department should consult for guidance and assistance, if any required from Compliance officer & Legal Department of the Bank about developments in the legal and statutory environment from time to time that may impact on the social media policy of Uttar Bihar Gramin Bank.

6.3 POLICY REVIEW

6.3.1 This policy will be reviewed by the Planning and Development Department annually and will be submitted to Board for approval, after vetting of policy by Operation Department and Compliance Officer of the Bank.

6.3.2 SCOPE OF REVIEW

The Department may review the following:

- Content of the policy and updates;
- Content of the social media;
- Customer feedback and utilization;
- Security of social media content- safety against unauthorized access, misuse by staff members, and its mitigation.
- Examine adoption of new technology, new application, features and outsourcing of the of social media management.
- Complaint received through social media and its resolution mechanism.

6.4 DELEGATION OF AUTHORITIES:

Authorities for different activities shall be as under:

Activity	Approving Authority
Social Poll	General Manager - HRD
Press Release	General Manager - Operation
Offers for Customers	General Manager concerned Department
Contest	General Manager concerned Department
Banking Transaction	General Manager-IT

6.5 PRECAUTIONS FOR SOCIAL MEDIA POLICY:

6.5.1 Having a social media presence that represents Bank's brand means responding quickly and directly.

6.5.2 Bank needs to plan for the worst while expecting the best.

6.5.3 A professional, responsible and adequately trained team should manage all communications on the Banks' social media sites. Team persons should be well versed with Social Media marketing and the risks of social media. Persons allocated to team should have knowledge of Banking, Marketing and Information Technology domains with content evaluation & effective communication skills.

6.5.4 All employees are potential spokesmen for our brand. They (including executives) should be trained in the basics of good and bad social media communications.

7. OUTSOURCING

In case, the banks do not have required resources, social media activity may be outsourced to third party vendor. The bank has to ensure that all requirements as regards confidentiality, safety, security of social media are met fully. Bank shall evaluate the capability of the service provider. In considering or renewing an outsourcing arrangement, appropriate due diligence should be performed to assess the capability of the service provider to comply with obligations in the outsourcing agreement. Due diligence should take into consideration qualitative and quantitative, financial, operational and reputation factors. Banks should consider whether the service providers' systems are compatible with their own and also whether their standards of performance including in the area of web service are acceptable to it.

7.1 THE OUTSOURCING AGREEMENT

The terms and conditions governing the contract between the bank and the service provider should be carefully defined in written agreements and vetted by a competent authority on their legal effect and enforceability. Every such agreement should address the risks and risk mitigation strategies identified at the risk evaluation and due diligence stages. The agreement should be sufficiently flexible to allow the Bank to retain an appropriate level of

control over the outsourcing and the right to intervene with appropriate measures to meet legal and regulatory obligations. The agreement should also bring out the nature of legal relationship between the parties – i.e. whether agent principal or otherwise.

Some of the key provisions of the contract would be:

- The contract should clearly define what activities are going to be outsourced including appropriate service and performance standards.
- The contract should provide for continuous monitoring and assessment of the service provider by the Bank so that any necessary corrective measure can be taken immediately.
- A termination clause and minimum periods to execute a termination provision, if deemed necessary, should be included.
- Controls to ensure customer data confidentiality and service providers' liability in case of breach of security and leakage of confidential customer related information.
- Contingency plans to ensure business continuity.
- The contract should provide for the approval by the Bank of the use of subcontractors by the service provider for all or part of an outsourced activity.

It should provide the Bank with the right to conduct audits, on the service provider whether by its internal or external auditors, or by agents appointed to act on its behalf and to obtain copies of any audit or review reports and findings made on the service provider in conjunction with the services performed for the bank.

7.2 CONFIDENTIALITY AND SECURITY

- Public confidence and customer trust in the bank is a prerequisite for the stability and reputation of the Bank. Hence the outsourcing authority of the Bank should ensure the preservation and protection of the security and confidentiality of customer information if any.
- The outsource vendor shall sign non-disclosure agreement with the bank.

7.3 MONITORING AND CONTROL OF OUTSOURCED ACTIVITIES

- The bank should have in place a management structure to monitor and control its outsourcing activities. It should ensure that outsourcing agreements with the service provider contain provisions to address their monitoring and control of outsourced activities.
- Bank should at least on an annual basis, review the financial and operational condition of the service provider to assess its ability to continue to meet its outsourcing obligations. Such due diligence reviews, which can be based on all available information about the service provider should highlight any deterioration or breach in performance standards, confidentiality and security, and in business continuity preparedness.

8. MODERATION

Posting, sharing, and forwarding of defamatory contents in text or multimedia format at Social media network are restricted. Defamatory contents include, but are not limited to, such contents that are: racist, sexist, threatening, insulting, unlawful and threatening to another's privacy. All defamatory postings will be removed by Uttar Bihar Gramin Bank's team at their discretion from supported official social platform. Social Media Team may block the users who share such contents. Chief Manager - Operation would approve the users to be blocked for defamatory postings.

All employees must follow the "Guidelines For Employees" and "Do's and Don'ts For Employees" mentioned in this policy which prohibits posting of defamatory messages. Any violation of these guidelines may result in disciplinary action in accordance with the Uttar Bihar Gramin Bank OSR, bipartite agreement and employee code of conduct or as per the law of the land.

9. PUBLIC RESPONSE/ COMPLAINTS

Feedback, suggestion or complaints posted at bank's Social Media pages will be responded suitably by Social media team. Complainants will be responded with information about available online support channels for resolution under bank's policy on Customer Grievances Redressal Mechanism and will be guided about escalating their issues online to customer complaints resolution system in place.

10. GUIDELINES FOR EMPLOYEES

The guidelines are factored in the Bank's own experience and regular tracking & monitoring of social media.

- a. **Be who you are.** If an employee wants to create his profile on social channel the employee may do so in his or her personal capacity and avoid creating any fictitious profile. In expressing personal or private views or opinions, stand by what has been expressed, and avoid any attribution to the Bank or its executives in this behalf, and further avoid making of any false, misleading or defamatory statements concerning the Bank or its executives.
- b. **Speak in the first person.** Employees should ensure to speak/ write/ post /tweet in the first person, should they wish to express anything in media, thus making it clear that he/she is speaking for himself/herself and not behalf of the Bank or its executives.
- c. **Use a disclaimer.** Whether an employee publishes a blog or some other form of social media, the employee should make it clear that the views and opinions are personal and not the official views and opinions of the Bank. The following disclaimer should be added in a reasonably prominent manner: "The views and opinions expressed or implied herein are my own and do not reflect those of my employer, who shall not be liable for any action that may result as a consequence of my views and opinions."
- d. **Respect your audience and your co-workers, customers or clients.** Employees should avoid using un-parliamentary language, personal insults or obscenity in any

communication. Proper consideration should be shown for privacy of co-workers and of customers & clients, and views and opinions that may be considered objectionable or inflammatory should be avoided.

- e. **Protect the Bank's clients, business partners and suppliers.** Employees should not quote or refer to clients, partners or suppliers. They should ensure that they do not denigrate the Bank, its executives, our competitors or regulators and all other stakeholders including customers/potential customers/agents/vendors /etc.
- f. **Protect confidential and proprietary information.** Any information, data or other proprietary materials acquired in course of business of the Bank and which pertains to any client, business partners or other organisation are governed by norms of confidentiality and secrecy and should not be published in any form or manner. When a reference is made, wherever possible, the source should be clearly mentioned.
- g. **Don't forget your job.** Employees should ensure that their digital or other online media activities do not interfere with their job or customer commitments. Employees should not use Uttar Bihar Gramin Bank brand/ premises/equipment for supporting personal political or religious activities and maintain proper decorum and distancing the Bank, its executives from the employees' own personal views/beliefs/participation.
- h. **Respect intellectual property rights and the laws of the land.** Internet postings, articles, videos should not include any intellectual property of the Bank (including its logos or trademarks) and should respect the intellectual property rights and right to privacy of all persons, and avoid any transgression of any other persons' rights.
- i. **Know Uttar Bihar Gramin Bank's Code of Conduct Guidelines.** One of the Bank's core values is "trust and personal responsibility in all relationships." As a Bank, Uttar Bihar Gramin Bank trusts and expects the employees to exercise personal responsibility whenever they participate in any form of media. This includes not violating the trust of those with whom they are engaging. All employees should be aware of the Uttar Bihar Gramin Bank's Code of Conduct and Business Ethics and abide by the same in all their communication.
- j. All employees would be advised to follow the Social Media Policy shared by bank. It would be brought to their notice through our internal network like HRMS/ CBS/Mail etc. for compliance.

11. CONSEQUENCES OF BREACH

Any violation of these guidelines may result in disciplinary action in accordance with the Uttar Bihar Gramin Bank OSR, bipartite agreement and employee code of conduct or as per the law of the land.

12. DO'S AND DON'TS FOR EMPLOYEES

DO'S

- Use your real name while creating your social network profiles.
- Make your profile in your personal capacity and use it with responsibility.
- If you comment on matters related to your work, use a disclaimer stating the views are your own and not of your employer.
- Avoid transgression of any other persons' rights.
- Be aware of the Uttar Bihar Gramin Bank's Code of Conduct and Business Ethics.
- Always follow corporate social media policy.
- Always respond to customer concerns expeditiously.
- The social media to be used for relationship building rather than self-promotion.

DON'TS

- Do not create fictitious profiles.
- Do not post anonymous comments.
- Do not use un-parliamentary language, personal insults or obscenity in any communication.
- Do not make any false, misleading or defamatory statements concerning your work or the organisation.
- Do not discuss matters related to clients or projects.
- Do not publish such official reports/policies/circulars/mails and any other information on public sites which are meant for internal circulation.