Nationwide Building Society

Brand, Member and Colleague Communications Policy
For Third Parties and Senior Relationship Owners

Introduction

This policy applies to third parties who commission, create, distribute, or maintain communications on behalf of Nationwide and sets out the minimum expectations and controls that must be in place and be operating effectively. It applies to any employee of a Nationwide-contracted third-party or subsidiary. The third party is responsible for adhering to relevant regulations and the requirements of the policy. The Senior Relationship Owner (SRO) within NBS is responsible for checking whether the third party is meeting these requirements and any relevant regulations are all satisfied by the third-party. This policy should be read alongside NBS' Operations Vendor Management Governance process and the third-parties' own internal processes/policies.

If we follow the requirements of this policy, our key communications should stay within the level of risk the Society deems acceptable for Brand, Member and Colleague communications.

Key Definitions

'Members' The use of 'Members' within this policy means all Nationwide Building Society product holders, regardless of whether they hold membership rights as well as landlords in relation to The Mortgage Works.

'Communication' The means for delivering information to our members and colleagues which are Nationwide Building Society (NBS), The Mortgage Works (TMW) and UCB Home Loans or dual branded. This includes physical communications, any messages displayed through our digital channels, and external communications sent to more than one recipient. This also includes templated content for tailored communications, and telephony scripts to ensure appropriate content approvals are sought

'Brand, Member and Colleague Communications Risk' Nationwide designs and delivers communications which do not meet the needs of its members or colleagues.

Key Statements

The following policy statements describe high-level control requirements that should be in place within any teams commissioning, creating, approving or distributing communications to members or colleagues.

To help prevent unclear, unfair and/or misleading information being distributed to members; Any third-party or subsidiary involved in the end to end communication journey must ensure that:

- Employees have received sufficient training and have the required level of competence to carry out this role

- All mandatory communications are identified and remain compliant with relevant regulation / legislation

- Member understanding and accessibility requirements are considered, and communications are provided in accessible formats to meet those needs

- Communications must be approved by appropriate stakeholders to confirm that they are clear, fair and not mis-leading

- Quality checks are completed to make sure that documented processes and procedures at each stage of the end to end communication journey (commission, creation, review, approval and distribution) are being followed and that content and data are accurate so our communications are clear, fair and not misleading

- Communications must be distributed as intended to the right members at the right time. Those areas responsible for physically distributing communications (electronic and paper-based) must ensure they have appropriate systems and controls in place which are (i) effective in reducing the risk of communications not being issued and (ii) detecting where these have not been sent as expected

- An appropriate suite of MI exists which helps detect whether communications are clear, fair, not misleading, accurate and issued to the right members at the right time. Where actual or potential issues are identified, action is taken to address this

- Control Owners will provide confirmation to the Senior Relationship Owner that policy requirements have been operated correctly throughout the communication journey. If non-adherence is identified, actions will be set and completed by the relevant teams

- Use appropriate control measures to make sure both the data itself and the application of the data is correct, giving assurance that the communication is being sent to the appropriate target audience. All consents and permissions should be observed

The SRO must work with the third-party to ensure that the right controls are in place and are tested.
They should be comfortable that sufficient MI is in place to measure whether the requirements of this policy are being met.
Wherever outside of tolerance on any metric, action is taken to address this.