

Group Standard

Reputation, Brand & Communications



Serco is committed to building a positive reputation with its stakeholders, wherever we operate

Document Details

Document Details		Serco Business
Reference		Version
SMS GS-BC4		4
Approval Date		Date for next review
December 2019		December 2021
Applicability		
Serco Group covering all business regions, operating companies and business units throughout the world ¹ covering:		
<ul style="list-style-type: none"> - employees, officers, directors and individuals working as consultants and contractors and any other parties acting as representatives or agents of Serco (Employees) - wholly owned subsidiaries and majority-owned operations 		
Where a minority interest and in regard to its subcontractors and suppliers Serco encourages alignment with this Standard		
Authority		
Chief Executive, Serco Group plc		
Accountable Policy Owner (Group)		
Group Strategy, Marketing & Communications Director		
Additional Information		
Supporting standards, standard operating procedures and guidance relating to this Group Standard are available within the Serco Management System		
Governance		
Our policies and standards, together with any regional or market requirements and enhancements to them, are authorised through a robust governance process.		
Consequence Management		
As a Group Standard the requirements detailed in this document are mandated and must be adhered to. Non-compliance will have consequences which may include disciplinary action. The Consequence Management Group Standard (Ref: SMS-GS-G1) details how instances of non-compliance will be dealt with		
¹ As used herein, Serco Group and its affiliates, subsidiaries and operating companies are referred to as "Serco". The "Company" or "company", or "we", "us" or "our"		

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1 Objectives

Serco is committed to building a positive reputation with its stakeholders, wherever we operate. As a leading business, our stakeholders include our people, customers, partners, politicians, interest groups, media, trade bodies, trades unions and investors, as well as those we are employed to serve and the wider public. Our people are our most powerful advocates and everybody who works for Serco is responsible for, and has a role in, helping build the right reputation, because this is a driver of our growth.

This Group Standard describes the principles and requirements that must be met to ensure that strategies and processes are implemented to protect and enhance our reputation and ensure effective communications in the event of crises.

The objectives of this Standard are to:

- Identify, assess, manage, mitigate and report risks to our reputation and develop opportunities to build our reputation and support our corporate strategy and growth objectives
- Ensure we effectively manage communications in the event of a crisis or threat to our reputation
- Develop an effective brand and reputation strategy, including the allocation of responsibilities and resources
- Identify and manage key stakeholders' expectations and perceptions to ensure effective two-way communication and engagement

¹ Advice on this matter, must be sought from Group Investor Relations

2 Policy Standards

2.1 Strategy and Organisation

- S1. Strategies, systems and procedures will be in place to:
- identify, assess, manage and report risks to our reputation and develop opportunities to build our reputation; these assessments will be used to inform brand and reputation strategy, focus and the allocation of responsibilities and resources
 - identify key stakeholders and establish two-way communications including matters that they care about, not just what matters to us
 - understand and consider stakeholders' perceptions of us
- S2. Proactive brand and reputation communication strategies, both internal and external, will be developed, implemented and monitored, with clear audiences, objectives and key messages identified and tracked. These will be aligned with short-, medium- and long-term growth aspirations as well as assessed risks and opportunities. Typical activities within strategies may include relationship building, policy shaping, thought leadership, partnership working, domain monitoring, media and marketing communication, community relations, stakeholder engagement, contact programmes etc.
- S3. Where we are contracted to represent our customer's brand, contracts will follow, where appropriate, the communication principles used by our customers but also consider opportunities to support Serco's brand and communications objectives.
- S4. Material announcements (those that can have a significant impact on the share price) must comply with the Listing Rules of the London Stock Exchange¹

- S5. Communications will be consistent in tone, style and design guidelines
- S6. Any communications regarding social media will be done in accordance with the Acceptable Use Group Standard²
- S7. Appropriate approvals will be obtained and retained for all images and words used, particularly where they show individuals and reference others e.g. customers
- S8. All web and marketing communications content will be kept up to date and verifiable
- S9. When responding to customer enquiries, tenders and bids as well as media, regulatory agencies and other external audiences, the information issued on behalf of the company will be accurate, consistent and timely. Misleading, false or exaggerated claims concerning the company, our services or competitors will not be made. Explicit agreement from the relevant Group or Divisional Communications lead will be sought where there is doubt or if this is a risk
- S10. The benefit or risks to the business will be considered prior to accepting any invitations to give external presentations or speeches. If accepted, presentations and speeches will be reviewed and approved as appropriate by the relevant communications person and line management prior to the event
- S11. Proactively and reactively managing the reputation of Serco's operations (including Joint Ventures and partnerships) and markets with external stakeholders including the media is the responsibility of the Group or Divisional communications lead. Issues, announcements and stories should be regularly coordinated and discussed between Group Head of Media Relations, Group Head of Investor Relations, and Group Strategy and Communications Director with Divisional communication leads to ensure consistent messaging and issue that have a corporate impact are appropriately handled.
- S12. Records of all external communications will be maintained for reference
- S13. Any sponsorship activities will be proportionate and seek to enhance the communities Serco serves and its reputation
- S14. Action and communications will be identified in the event of a major negative event in order to support a Crisis Management Team. Having background material ready in advance about key reputationally challenging contracts and operations is useful due to the speed the media operates e.g. key facts, achievements, third party endorsement, stakeholder contacts
- S15. Contract bidding activity and other market developments will be monitored and advice and support provided (communications and marketing plans, speaking points, Q&A and management of media releases and announcements).
- S16. External audiences will look across all our activities so all external communications activity is routinely discussed and coordinated between the Divisions and Group
- S17. Serco has many joint ventures and partnerships. In such cases we will:
- Define our reputation and brand communication requirements
 - Agree the approach to employee segmentation
 - Agree and follow a reporting line structure
 - Ensure incident/critical reporting activity is in place
 - Co-ordinate communications activity
 - Seek to leverage and/or build the Serco brand
- S18. Reputation, Brand and Communication activity will be subject to formal audit and compliance programmes and processes

² See Acceptable Use Group Standard Ref: SMS GS-BC1

3 Responsibilities & Accountabilities

S19. The following responsibilities will apply to the delivery of the defined standards. If these are not completed effectively, the person responsible will be accountable for any consequences³.

Group

S20. The Group CEO will appoint a group corporate affairs lead responsible for:

- a. developing and maintaining Group Reputation, Brand and Communication policy
 - b. ensuring standards and associated procedures and key controls remain fit for purpose, reflect legislative and regulatory requirements and effectively manage reputation, brand and communication risks
 - c. providing oversight and reporting brand, reputation and communication performance and issues
 - d. developing and annually reviewing an internal/external Reputation, Brand and Communications strategy
 - e. managing reputation risks and reporting on these quarterly
 - f. ensuring Group level sponsorship is managed and approved
 - g. ensuring all web and marketing communications is kept up to date
 - h. ensuring a communications lead forms part of any formal Crisis Management response team
 - i. Ensure online brand protection monitoring is managed globally
- A Group Head of Media Relations will be appointed to ensure: relationships with media are maintained; all issues, events, announcements are effectively managed; reputational risks are identified and appropriately managed; and, training is provided to those who speak on behalf of Serco.

Division

S21. The Divisional CEO will appoint a Divisional Communications lead or appropriate communications resources responsible for:

- a. implementing reputation, brand and communication strategy and policy, standards, procedures and key controls across the division; which may include the development of country/region/divisional procedures and management systems
- b. ensuring procedures and key controls remain fit for purpose, reflect legislative, contractual and regulatory requirements and effectively manage reputation, brand and communication risks
- c. providing oversight and reporting divisional reputation, brand and communication performance and issues
- d. defining detailed operating models for the provision of a Communications function
- e. implementing a compliance framework to provide confidence that key controls are being implemented effectively
- f. providing competent reputation, brand and communication advice
- g. developing and annually reviewing an internal/external Divisional Reputation, Brand and Communications strategy
- h. managing reputation risks and reporting on these quarterly
- i. providing media training to those who speak on behalf of Serco
- j. informing Group Head of Media Relations of any issues which may receive significant media attention
- k. ensuring sponsorship is managed and approved
- l. ensuring all web and marketing communications is kept up to date, ensuring all business development activity considers brand, reputation and communication principles to be agreed and adopted with the customer
- m. ensuring a communications lead forms part of any formal Crisis Management response team

Business Unit

S22. The Business Unit Managing Director is responsible for:

- a. Complying with reputation, brand and communication policy, standards, procedures and key controls
- b. Ensuring appropriate reputation, brand and communication resources are available to support the business unit manage risks,

³ See Consequence Management Group Standard Ref:SMS-GS-G1

- deliver objectives and targets and provide competent reputation, brand and communication advice
- c. informing the Divisional Media Lead of any issues which may receive media attention
- d. ensuring sponsorship is managed and approved
- e. ensuring all web and marketing communications is kept up to date liaising with the Divisional Marketing lead
- f. ensuring a Communications Lead forms part of any formal Crisis management response team

Contract/Function

S23. The Contract Manager (or Corporate Function Head) is responsible for:

- a. complying with reputation, brand and communication policy, standards, procedures and key controls
- b. ensuring reputation, brand and communication responsibilities are clearly defined
- c. ensuring local controls are in place for providing assurance that reputation, brand and communication risks are being effectively managed
- d. informing the Divisional Media Lead of any issues which may receive media attention
- e. ensuring sponsorship is managed and approved
- f. ensuring all web and marketing communications is kept up to date
- g. ensuring a communications lead forms part of any formal Crisis Management response team

4 Processes and Controls

4.1 Governance processes and controls

Process

A set of related activities that must be carried out to achieve policy outcomes

Controls

The action we put in place to mitigate a risk(s) within a key process and/or the delivery of policy outcomes. These are mandated and are the minimum that should be implemented regardless of any local difference

Responsibility

for ensuring controls are in place and operating effectively

Ref	Description	Ref	Description	Group (S20)	Division (S21)	Business Unit (S22)	Contract / Function (S23)	All Employees
P1	Reputation, Brand and Communications responsibilities are defined and understood	⇒ C1	<p>Group Strategy, Marketing and Communications Director is appointed by the Group CEO with responsibility for:</p> <ul style="list-style-type: none"> • Developing and maintaining Group Reputation, Brand and Communication policy • Ensuring standards and associated procedures and key controls remain fit for purpose, reflect legislative and regulatory requirements and effectively manage reputation, brand and communication risks • Providing oversight and reporting brand, reputation and communication performance and issues • Developing and annually reviewing an internal/external Reputation, Brand and Communications strategy • Managing reputation risks and reporting these quarterly • Ensuring sponsorship is managed and approved • Ensuring all web and marketing communications is kept up to date globally • Ensuring a communications lead forms part of any formal Crisis Management response team 	●	○	○	○	○

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Responsibility

for ensuring controls are in place and operating effectively

Ref	Description	Ref	Description	Group (S20)	Division (S21)	Business Unit (S22)	Contract / Function (S23)	All Employees
C2	<p>A Divisional Communications lead or appropriate communications resources are appointed by the Divisional CEO with responsibility for:</p> <ul style="list-style-type: none"> Implementing reputation, brand and communication strategy and policy, standards, procedures and key controls across the division; which may include the development of country/region/divisional procedures and management systems Ensuring procedures and key controls remain fit for purpose, reflect legislative, contractual and regulatory requirements and effectively manage reputation, brand and communication risks Providing oversight and reporting divisional reputation, brand and communication performance and issues Defining detailed operating models for the provision of a Communication function Implementing a compliance framework to provide confidence that key controls are being implemented effectively Providing competent reputation, brand and communication advice Developing and annually reviewing an internal/external Divisional Reputation, Brand and Communications strategy 			<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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Responsibility

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Ref	Description	Group (S20)	Division (S21)	Business Unit (S22)	Contract / Function (S23)	All Employees
	<ul style="list-style-type: none"> Managing reputation risks and reporting on these quarterly 					
	<ul style="list-style-type: none"> Providing media training to those who speak on behalf of Serco Informing the Group Head of Media Relations of any issues which may receive significant media attention Ensuring sponsorship is managed and approved Ensuring all web and marketing communications is kept up to date Ensuring all business development activity considers brand, reputation and communication principles to be agreed and adopted with the customer Ensuring a communications lead forms part of any formal Crisis Management response team 					
→ C3	<p>Appropriate reputation, brand and communication resources are appointed by the Divisional Communications Lead and Business Unit Managing Director with responsibility for:</p> <ul style="list-style-type: none"> Supporting the business to manage reputation, brand and communication risks Providing competent reputation, brand and communication advice to Contract, Business Unit and Divisional Management Teams 	<input type="radio"/>	<input checked="" type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

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Controls

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Ref	Description	Group (S20)	Division (S21)	Business Unit (S22)	Contract / Function (S23)	All Employees
➔ C4	<p>Business Unit MDs are responsible for:</p> <ul style="list-style-type: none"> Complying with reputation, brand and communication policy, standards, procedures and key controls Ensuring appropriate reputation, brand and communication resources are appointed to support the business unit manage risks, deliver objectives and targets and provide competent reputation, brand and communication advice informing the Divisional Communications Lead of any issues which may receive media attention ensuring sponsorship is managed and approved ensuring all web and marketing communications is kept up to date ensuring a communications Lead forms part of any formal Crisis management response team 	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
➔ C5	<p>Contract Managers and Corporate Function Heads are responsible for:</p> <ul style="list-style-type: none"> Complying with reputation, brand and communication policy, standards, procedures and key controls Ensuring reputation, brand and communication responsibilities are clearly defined 	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>



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Controls

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Responsibility

for ensuring controls are in place and operating effectively

Ref	Description	Ref	Description	Group (S20)	Division (S21)	Business Unit (S22)	Contract / Function (S23)	All Employees
			<ul style="list-style-type: none"> Ensuring local controls are in place for providing assurance that reputation, brand and communication risks are being effectively managed Informing the Divisional Communications Lead and Media lead of any issues which may receive media attention Ensuring sponsorship is managed and approved Ensuring all web and marketing communications is kept up to date Ensuring a communications lead forms part of any formal Crisis Management response team 	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
P2	Establish Reputation, Brand and Communications Policy	➔ C6	Policy, standards and group procedures are defined and published	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
P3	Establish Reputation, Brand and Communications systems and processes	➔ C7	Internal and external brand, tone, style and design guidelines, including web and marketing communications guidelines are defined and communicated	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
		➔ C8	Internal and external brand, tone, style and design guidelines, including web and marketing communications guidelines are implemented	<input checked="" type="radio"/>	<input checked="" type="radio"/>	<input checked="" type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
		➔ C9	Processes are established for reporting and agreeing variations to defined Group requirements	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>



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Ref	Description	Ref	Description	Group (S20)	Division (S21)	Business Unit (S22)	Contract / Function (S23)	All Employees	
P4	Reputation, Brand and Communications Compliance	➔	C10	Guidelines and procedures on Reputation, Brand and Communication are periodically reviewed to ensure they remain effective and fit for purpose	●	●	○	○	○
		➔	C11	Procedures to protect the brand and reputation with joint ventures and partnerships are established by Group, implemented and communicated	●	●	●	●	○
		➔	C12	A Reputation, Brand and Communication compliance plan is in place	○	●	○	○	○
		➔	C13	Agreed actions are closed out	○	●	●	●	○

4.2 Key processes and controls

Process

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Ref	Description	Ref	Description	Group (S20)	Division (S21)	Business Unit (S22)	Contract / Function (S23)	All Employees
P5	Establish Reputation, Brand and Communication Strategy	⇒ C14	An overarching Group internal/external Brand, Reputation and Communication strategy includes customer relationship management and is approved by the Executive Committee and implemented across the business lifecycle	●	○	○	○	○
		⇒ C15	Divisional internal/external Brand, Reputation and Communication strategies include customer relationship management, are aligned with Group Strategy, approved by the Divisional EMT and implemented for all divisions	○	●	○	○	○
		⇒ C16	Divisional and local reputation, brand and communication strategies are annually reviewed	○	●	○	○	○
P6	Manage reputation risks	⇒ C17	Group & Divisional risk registers are developed, with mitigating controls implemented to identify and manage reputation risks	●	●	○	○	○
		⇒ C18	Reputation risks are reviewed and reported quarterly	●	●	○	○	○

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Ref	Description	Ref	Description	Group (S20)	Division (S21)	Business Unit (S22)	Contract / Function (S23)	All Employees
P7	Use of third party assets, brands or images	⇒ C19	Approval is obtained and retained locally for the use of any third party assets, brands or images	●	●	●	●	○
P8	Manage external communications	⇒ C20	All web and marketing communications content is kept up to date	●	●	●	●	○
		⇒ C21	Media training is provided to all those who speak on behalf of the company	●	●	●	●	○
		⇒ C22	External communications are supported and approved by an appropriate communications lead	●	●	●	●	○
		⇒ C23	Group Head of Media is informed where there are issues which may receive significant media attention	●	●	●	●	○
		⇒ C24	Records are maintained of all external communications (including communication with the media)	●	●	●	●	○
P9	Manage sponsorship	⇒ C25	Any sponsorship is approved in line with delegated approvals authorities, with evidence of approval retained	●	●	●	●	○
P10	Employee responsibilities	⇒ C26	All employees have been made aware of the Acceptable Use Group Standard	●	●	●	●	○



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Ref	Description	Ref	Description	Group (S20)	Division (S21)	Business Unit (S22)	Contract / Function (S23)	All Employees
P11	Business Development	⇒ C27	All employees have been made aware of the need to report to line management or their Divisional or Communications lead any instances where Serco's brand/reputation may be compromised on-line	●	●	●	●	○
		⇒ C28	Bidding processes consider brand, reputation and communication principles to be agreed and adopted with the customer	○	●	●	○	○
		⇒ C29	The bid lead ensures all external communications activity is routinely discussed and co-ordinated with the Divisional or appropriate Communications Lead	○	●	●	○	○
		⇒ C30	Reputational risks are identified for joint ventures/partnerships/acquisitions/new market entries, with mitigating activities implemented accordingly	○	●	●	○	○
P12	Support Crisis Management	⇒ C31	A Communications Team representative forms part of any formal Crisis Management response team	●	●	●	●	○

5 Supporting documentation and guidance

The following should be read in conjunction with this Standard:

Ref	Document
SMS GS-BC1	Acceptable Use Group Standard
SMS-GS-RM2	Business Continuity and Crisis Management Group Standard

6 Definitions

Term	Definition
Accountability	Being accountable means being not only responsible for something but also answerable for your actions.
Responsibility	<p>A responsible person is the individual who completes the task required. Responsibility can be shared and delegated.</p> <p>All responsible persons will also be accountable for completing tasks effectively. Non-compliance will have consequences which may include disciplinary action as defined within the Consequence Management Group Standard.</p>
Group	Serco Group plc is the administrative centre of the organisation, responsible for setting corporate strategy, defining governance requirements and supporting the business in its day to day operations
Division	The Group will define a set of business divisions which will be responsible for business delivery within a defined set of markets or geographies.
Business Unit	<p>A Business Unit is a cluster of contracts which provide a similar service e.g. Health, Defence, Transport etc.</p> <p>Where appropriate, a separate legal entity wholly owned or where Serco has a controlling share may also be referred to as a Business Unit, where appropriate.</p> <p>This may also refer to Counties/Territories</p>

Term	Definition
Contract	<p>A Contract provides specified requirements to a customer (either directly with Serco or to a consortium/Joint Venture in which Serco is a party)</p> <p>A Contract will also refer to a corporate/functional area.</p> <p>Corporate/functional areas are functions which support the business and they include finance, HR, procurement etc.</p>
Reputation	The attitude a stakeholder holds towards the organisation.
Stakeholder	An identified individual or group that holds a justifiable interest in the organisation. Not all stakeholders can have a direct impact on the business.
Brand	Is another word for reputation. It is often confused with Corporate Identity.
Corporate Identity	Is the set of designs used to give the organisation an identity and visibility in its communication materials logo, strapline, typeface, preferred styles of artwork design and photography.
Crisis definitions	Are contained within the Business Continuity Management Group Standard Ref: SMS-GS-RM2

7 Further information and support

If you require any further information or support regarding this Group Standard, or if you have any suggestions for improvement, please contact the Accountable Policy Owner (Group) or email sms@serco.com