



# Newable Advice Social Media Policy

Version 1.0

## Version Control

Version	Owner	Reviewer	Changes	Approval date	Next Review
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## 1. Context

This policy outlines the expectations, responsibilities, and standards for all Newable Advice employees when they directly or indirectly engage with, or refer to, the Newable Group, Newable Advice, its subsidiaries, services, programmes or stakeholders on any social media channel, messaging, or online communication applications.

As the use of social media and online communication platforms continues to grow, it is essential that we maintain our professional reputation, safeguard the reputation of our clients and colleagues, and align all our digital communications with the company's values and ethos. While social media and online networking can be a powerful tool for promoting our services and business, it also carries significant reputational risks if used inappropriately.

This risk is particularly relevant for Newable Advice. As a leading organisation in the delivery of funded programmes, we work closely with private organisations and government bodies at all levels to support SMEs and often use their brand to engage with the business community and general public - it is therefore essential that all activity conducted by staff on social media, messaging apps and other online platforms reflects our commitment to professionalism, respect, tolerance, inclusion, responsible use of public funds and avoids any direct or indirect potential reputational risk for our organisation or, by association, for our public and private sector clients.

Newable, as a group, has determined that it has a low appetite for operational risk and has communicated this clearly in its [Risk Strategy, Appetite and Management Framework](#). This policy aligns with this general approach and is aimed at maintaining operational risks related to the use of social media by members of the Newable Advice team at an acceptable level.

## 2. Definitions

For the purpose of this policy, henceforth:

- 'COMPANY' means Newable Advice i.e., Newable Contracts Holdings Limited, and all their subsidiaries.
- 'STAKEHOLDERS' refers to any private or public sector funder, client, partner, corporate or government body Newable Advice and its subsidiaries work or partner with to deliver its services or funded programmes.
- 'BELIEFS' refers to personal or philosophical beliefs that are genuinely held, lawful, respectful of others, and consistent with the definition of belief under the Equality Act 2010. This does not extend to opinions, statements, or expressions that are discriminatory, unlawful, or likely to bring the COMPANY or its STAKEHOLDERS into disrepute.
- 'SOCIAL MEDIA' refers to any social media channel (e.g. Facebook, LinkedIn, Instagram, X (formerly Twitter), Snapchat etc.), online forums, chats, discussion boards,

blogs, messaging platforms (e.g. WhatsApp, Microsoft Teams, Loop, Slack etc.), video sharing apps (e.g. YouTube, Vimeo, Tik Tok etc.) or any other digital platform, system or tool used internally or externally to create, share or engage in online content or communication.

### 3. Purpose

The purpose of this policy is to:

- Protect the brand and reputation of the COMPANY, its employees, and STAKEHOLDERS from misuse of SOCIAL MEDIA by its staff, contractors and suppliers (during the contracted period) that could result in reputational or operational harm for the COMPANY.
- Ensure consistent and accurate representation of the COMPANY's and its STAKEHOLDERS' brand identity, values, and tone of voice in the digital space.
- Ensure all Newable Advice staff, contractors and external consultants who work for the business in an employed or contracted capacity understand their responsibilities and the reputational risks associated with their conduct when using SOCIAL MEDIA both in a professional and personal capacity.
- Provide clear guidance on the acceptable and unacceptable use of SOCIAL MEDIA in any circumstance, both personal and professional, where there is the potential risk of direct or indirect association to the Newable Group, the COMPANY, its services, programmes and/or STAKEHOLDERS to support our staff in navigating social media appropriately.
- Minimise the risk of legal, regulatory, commercial, and reputational damage for the COMPANY.
- Promote respectful, accurate, and transparent communication on SOCIAL MEDIA and other online channels by all people working, contracted by or associated with the COMPANY, with the aim of contributing to creating an inclusive, respectful, and safe online environment that reflects the ethos and values of Newable, the COMPANY and its STAKEHOLDERS.
- Encourage a responsible and positive engagement with SOCIAL MEDIA by all members of staff both in a personal and professional capacity.

### 4. Scope

This policy applies to:

- All permanent or temporary employees of the COMPANY.
- All suppliers, contractors or external consultants working for or on behalf of the COMPANY during the contracted period.
- Both professional and personal use of SOCIAL MEDIA whenever the COMPANY, its

services, programmes or STAKEHOLDERS are directly or indirectly referenced, represented, or mentioned or where the association with the COMPANY, its services, programmes or STAKEHOLDERS is known, evident, easily identifiable, or implied.

- All SOCIAL MEDIA used both internally and externally, when the association to the Newable Group, the COMPANY, its services, programmes or STAKEHOLDERS is known, evident, easily identifiable, or implied.

## 5. Principles

When sharing content online in a professional capacity or in a way that can lead to a direct or indirect association with the Newable Group, the COMPANY, its services, programmes or STAKEHOLDERS, employees, suppliers, contractors, or external consultants must:

- **Be professional** – Individuals posting content on any SOCIAL MEDIA must maintain high standards of professional conduct when directly or indirectly referring to the COMPANY, colleagues, clients, services, programmes or STAKEHOLDERS.
- **Be respectful and inclusive** – In line with the principles set in the Newable Code of Conduct, Diversity and Inclusion, Sexual Harassment and Equal Opportunity and Anti-Harassment policies, all online communications should be respectful, inclusive and avoid language or topics that are discriminatory, aggressive, inflammatory, personally or professionally demeaning, harassing, disrespectful or offensive. The COMPANY has a zero-tolerance approach towards any form of discrimination or harassment. Failure to comply with this requirement may lead to disciplinary action and, in serious cases, could be treated as gross misconduct under the Company's Disciplinary Policy. This policy is not intended to restrict lawful personal expression or genuinely held beliefs, provided such expression is respectful, lawful, and does not create a reasonable perception of representing or damaging the COMPANY or its STAKEHOLDERS.
- **Be truthful**: Sharing misleading or false content, false representation or concealing affiliation with the COMPANY is prohibited.
- **Protect confidentiality** – Individuals should not share on SOCIAL MEDIA sensitive, proprietary, or confidential information related to the COMPANY, colleagues, STAKEHOLDERS, partners or programmes. Failure to comply with this requirement may result in disciplinary or legal action and in most cases will be considered a form of gross misconduct.
- **Use good judgement** – Individuals should assume everything posted on SOCIAL MEDIA is public and permanent and avoid using content, language, images, or footage that could bring the COMPANY and its STAKEHOLDERS into disrepute, directly or by association.
- **Be accountable** – Individuals are personally responsible for the content they publish or share online, even on their personal SOCIAL MEDIA accounts if the content could be linked to the COMPANY, its services, programmes or STAKEHOLDERS. When there is a risk of association with the Newable Group, the COMPANY, its services, programmes

or STAKEHOLDERS, all content shared online both in a professional and personal capacity must meet the standards set out in this policy.

- **Be transparent** – When individuals identify themselves as the COMPANY, or one of its subsidiaries, employees, contractors or consultants, or this association can be easily made because of the content they publish, the references they make or the platform they use to share it (e.g., LinkedIn), they must make it clear that views expressed are their own, not the company's. This can be achieved by adding to the social media account bio/description or shared content the following sentence: *'Opinions expressed on XXX are solely my own and do not necessarily reflect the views of my employer or its clients.'* **Using this sentence is a requirement on LinkedIn profiles or other social media handles when Newable or Newable Advice is referenced as the current employer or contracting entity.**
- **Report risks** – Individuals should promptly flag via email to their Line Manager and the Newable Advice Event Marketing Manager any concerning or non-compliant content and any misrepresentations of the Newable Group, the COMPANY, its services, programmes or STAKEHOLDERS by other members of staff, contractors or external consultants working for the COMPANY.

## 6. Acceptable Use

These are examples of the type of content the COMPANY'S employees, contractors or external consultants (during the contracted period) can share on SOCIAL MEDIA when acting in a professional capacity or whenever the content itself or the platform used can lead to an association with the Newable Group, Newable Advice, its subsidiaries, services, programmes or STAKEHOLDERS:

- Sharing or resharing news, achievements, case studies, success stories, or attendance to events related to their work or the services/programmes they support. If the content relates directly or indirectly to a service or programme that the COMPANY delivers on behalf of a client, the content must always comply with the approved branding and identity guidance set by that funder. This principle applies indistinctly to text, images, or video content. In case of doubt about the branding requirements associated with a specific service or programme, individuals should contact the Newable Advice Event Marketing Manager, Hannah Williams, via email before sharing the content online. The COMPANY reserves the absolute right to request that any content that does not meet this requirement is immediately amended, made compliant, or taken down.
- Sharing thought leadership in line with their expertise, skills, or experience in line with the principle set in clause 4 of this policy.
- Sharing positive COMPANY or Newable Group news, social activities, or achievements once publicly shared.

- Engaging in a professional manner with content shared by the Newable Group, the COMPANY, their subsidiaries, or STAKEHOLDERS by resharing, commenting and liking it.
- Encouraging your contacts to follow the various social media channels of the Newable Group, the COMPANY, and their subsidiaries.
- Liaising in a professional manner with prospective clients, partners, and STAKEHOLDERS to support the delivery of the services/programmes they work on, the achievement of their personal/team targets and the COMPANY's contractual KPIs.
- Using appropriate disclaimers when expressing personal opinions relating to their area of expertise.

Please note that the above list is not exhaustive and other content can be considered acceptable providing it complies with the spirit and the letter of this policy.

## 7. Unacceptable Use

These are examples of the type of content or language COMPANY employees, contractors or external consultants (during the contracted period) should not share or use on SOCIAL MEDIA when acting in a professional capacity or whenever, also in a personal capacity, the content itself or the platform used can lead to a direct or indirect association with the Newable Group, the COMPANY, their services, programmes or STAKEHOLDERS:

- Posting, re-sharing, or liking discriminatory, false, offensive, demeaning, degrading, inflammatory or political content from any source.
- Posting content using outdated or incorrect branding including logos, colours, tone of voice or messaging. This is strictly prohibited as it can misrepresent the COMPANY or its STAKEHOLDERS and damage brand consistency. The company reserves the right to request that any content that is not on brand or message is immediately amended or taken down by those who have posted it.
- Posting, resharing or liking content, images or videos that do not reflect the level of professionalism expected by all COMPANY'S employees, contractors, and external consultants in line with the COMPANY Code of Conduct.
- Sharing confidential, insider, proprietary or any other information or document that may disclose, or be perceived as disclosing, sensitive company information. This includes, but is not limited to, internal business strategies, financial data, forecasts, performance metrics, contractual information, client, or supplier contact details, employee or HR related matters, legal discussions, investigations, or disciplinary actions. Posting this type of content online may lead to disciplinary action, which could include dismissal in gross misconduct cases, and/or legal action where appropriate.
- Posting content that could be interpreted as direct or indirect personal gain.



- Impersonating the company or speaking on its behalf without formal pre-approval from the COMPANY Managing Director, Malcolm Cohen, Deputy Managing Director, Thom Webb or Head of Events and Live Marketing, Giacomo Gatti.
- Engaging in hostile, inflammatory, political or combative discussions on SOCIAL MEDIA both in a professional and personal capacity, particularly when the content itself or the platform used can lead to an association with the Newable Group, the COMPANY, their services, programmes or STAKEHOLDERS, as that could reflect poorly on the member of staff's professional standing and the COMPANY's or its STAKEHOLDERS' reputation.
- Commenting on crisis, legal or commercial matters related to the Newable Group or the COMPANY. Posting this type of content online may lead to disciplinary action, which could include dismissal in gross misconduct cases, and/or legal action where appropriate.

Please note that the above list is not exhaustive. When publishing content online, members of staff, contractors, or external consultants working for the COMPANY should always remember that social media is a public space—even when privacy settings are enabled. Private messages can be made public very easily. Therefore, care must be taken when direct messaging people through social media or other communication apps. Nothing is truly private once shared online, and the distinction between personal and professional space is often blurred—especially when it is easy to associate an individual's name with the COMPANY, its services, programmes, and STAKEHOLDERS

Thoughtless, inappropriate, or unauthorised content published online can lead to serious reputational damage, legal action, and loss of business for the COMPANY and to reputational damage, potential disciplinary or even legal action for the individual involved.

It is important to note that the COMPANY retains the right to decide what constitutes unacceptable use of SOCIAL MEDIA by COMPANY employees, contractors or external consultants (during the contracted period) when they share content online in a professional capacity or whenever, also in a personal capacity, the shared content or the platform used can lead to a direct or indirect association with the Newable Group or the COMPANY.

When in doubt if a piece of content is compliant with this policy, individuals should always check with the COMPANY's Event Marketing Manager via email before sharing it on SOCIAL MEDIA.

## 8. Privacy and Safeguarding

At the COMPANY we are committed to protecting the privacy, dignity, and safety of all individuals we engage with or are directly or indirectly impacted by our services – this includes our employees, clients, suppliers, customers, and members of the public. While using SOCIAL MEDIA and other digital communication channels both internally and externally, COMPANY employees, contractors or external consultants working for the business must:

- Never share identifiable personal information e.g. name, job title, personal photos, location, contact details etc. of other individuals (such as colleagues, clients, partners, suppliers etc.) without their explicit consent, unless sharing is required by law or part of the individual's normal professional duties and compliant with the Company's Data Protection Policy.
- Refrain from posting images or videos taken in the workplace, especially if they feature colleagues or clients, unless explicitly authorised by the Newable Advice Head of Events and Live Marketing and the individuals involved via email.
- Be especially cautious when referencing minors, vulnerable individuals or anyone covered by relevant safeguarding legislation. Their identities must always be protected, and content involving them must be reviewed and approved via email by the COMPANY Head of Events and Live Marketing, Giacomo Gatti and Director of HR, Lyca Amichia prior to publication. Failing to follow this procedure may lead to disciplinary action and, in serious cases, could amount to gross misconduct.
- Respect boundaries and privacy by not mentioning or expressing opinions without a reason about colleagues and their work on company or even private SOCIAL MEDIA if they can be accessed by other colleagues, unless this is part of their normal work duties or responsibilities e.g. as part of the normal communications related to the delivery of a service or when a manager praises the achievements of a member of his or her team.
- Avoid sharing internal platforms or screenshots that include staff names, emails, messages, sensitive documents, or references to company systems.
- Immediately report any breaches or risks to privacy or safeguarding to the Newable Data Protection Officer (DPO) Mashudul Karim, Chief Technology Officer and Director of HR Lyca Amichia in line with the [Newable Data Protection Policy](#).

Newable Advice takes privacy and safeguarding very seriously. Failure to comply with the provisions of this article may lead to disciplinary and/or legal action. In serious cases, this could amount to gross misconduct for employed staff or constitute justifiable grounds for termination of contract for contractors and external consultants.

## 9. LinkedIn

If they have a LinkedIn profile, members of staff must always:

- Reference Newable or Newable Advice as their current employer unless specifically requested or advised not to by the COMPANY Head of Events and Live Marketing, Giacomo Gatti to comply with specific contractual requirements set by our funders.
- Truthfully reflect their role and responsibilities as a COMPANY employee when describing their work experiences.
- Comply with any guidance issued by the COMPANY on how to present their current work experience and the services they provide on behalf of our clients in line with the

requirements set by the latter.

- Keep their profile up to date and avoid situations that could be potentially interpreted as a potential conflict of interest with the COMPANY, e.g., by leaving open the end date of past work experiences.
- Add to their bio (About) the sentence '*Opinions expressed on LinkedIn are solely my own and do not necessarily reflect the views of my employer or its clients.*'

## 10. Breach of Policy

Any breach of this Policy may lead to:

- For employed members of staff: formal and informal investigations, actions short of disciplinary e.g., enrolment on mandatory training, or disciplinary action, including (depending on the severity of the incident) letter of concern, first written warning, final written warning, or termination of employment.
- For contracted suppliers and external consultants working for the COMPANY: termination of contract.

In addition, the COMPANY reserves the right to request that any content posted online that does not comply with this policy and other guidance issued by the COMPANY to align with the branding requirements set by our funders is immediately amended by those who shared it or taken down if full editing e.g. to images or video footage is not possible or practical.

## 11. Sharing the Policy

Any member of staff procuring or overseeing the activity of contractors or external consultants working for or delivering services on behalf of the COMPANY and its programmes is required to share this policy with these suppliers at the start of the contractual relationship (or when the policy is formally approved for the first time) and request written confirmation of their commitment to comply with it.

The requirement to abide by this policy must be included in any contract or agreement with external contractors or suppliers issued by the COMPANY.

## 12. Review and Updates

This policy will be reviewed annually and updated as necessary to reflect changes in SOCIAL MEDIA trends, legal requirements, and business practices.

## 13. Contact Information

Newable Advice Managing Director

Malcolm Cohen  
Tel: +44 20 7234 3042  
Mob: +44 7739 592395  
Email: [malcolm.cohen@newable.co.uk](mailto:malcolm.cohen@newable.co.uk)

Newable Advice Deputy Managing Director

Thom Webb  
Mob: +44 7821 681610  
Email: [thom.webb@newable.co.uk](mailto:thom.webb@newable.co.uk)

Newable Advice Head of Events & Live Marketing

Giacomo Gatti  
Tel: +44 20 7940 1573  
Mob: +44 7803 201003  
Email: [giacomo.gatti@newable.co.uk](mailto:giacomo.gatti@newable.co.uk)

Newable Advice Event Marketing Manager

Hannah Williams  
Tel: +44 1489 661 445  
Mob: +44 7885 556663  
Email: [hannah.williams@newable.co.uk](mailto:hannah.williams@newable.co.uk)