APPROACH SOCIAL MEDIA WITH CONFIDENCE: BUILDING A VISIBLE, CREDIBLE AND COMPLIANT ONLINE PRESENCE

Questions and Answers from the webinar on 5 May 2026

The points below are intended as practical guidance from the webinar's panelists.

As always, advisers should work within their firm or network's social media policy and seek compliance approval where appropriate.

Question 1:
Do generic brand-building posts (e.g. meet the team, trending dances) need caveats and/or compliance approval? And can this style of content use hashtags like #financialadvisers or not?

Answer:
Some firms require approval for "meet the team" posts introducing regulated advisers, particularly if the content references financial services, client outcomes or advisory expertise.

That's because the FCA definition of a financial promotion is broad, and even seemingly light-touch brand content can contribute to an inducement when viewed in context.

Purely social or culture-focused posts may present lower regulatory risk and, depending on a firm's policy, may sit outside formal financial promotion approval processes. When a post starts promoting regulated roles or services, many firms will treat it as requiring review and approval under their social media policy.

This explains why different networks often reach different conclusions. The underlying regulation is the same, but firms apply different risk appetites and supervisory approaches.

Generic brand awareness content (e.g. office culture, community activities, trend-led content) won't usually be classed as a financial promotion if it doesn't invite or induce someone to engage in regulated activity.

That means many purely brand-building posts may not require the same level of compliance approval as product or advice-related content.

However, firms should still have governance in place because context matters. A seemingly harmless post can become promotional if it references services, outcomes, benefits, client types, or calls to action.

For example:

- "Meet our paraplanner, Sarah" is likely low risk
- "Meet Sarah, who helps clients retire early with smart pension planning" starts moving into promotional territory.

It's worth remembering that consumers may not separate 'brand' and 'regulated' content in the same way as firms. They experience the business as one brand, which is why consistency and clarity across all touchpoints matter.

Hashtags are similar. Generic hashtags such as #financialadviser, #wealthmanagement or #mortgagebroker are not automatically prohibited, but they can contribute to a post's overall promotional context. Firms should ensure hashtags are accurate, not misleading, and aligned with the firm's actual permissions and activities.

It's also worth considering hashtags from a client perspective, not just a compliance perspective. For example, if someone repeatedly sees hashtags linked to advice, retirement or wealth alongside your content, that can contribute to the overall impression of the services you provide, even where the post itself feels fairly light-touch.

The best next step is to ask your network about their approach to using 'advice' in hashtags, as interpretation does differ.

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Question 2:
Without paid advertising, organic posts reach very few followers: Facebook (around 3-5% of followers), LinkedIn (around 6%) and TikTok (was good but now <10% of followers, and falling).

Answer:
It's absolutely right that organic reach has declined significantly across most platforms, particularly for business accounts.

That creates an important tension for regulated firms:

- Platforms reward engaging, native, human content
- Regulation requires clarity, fairness, and oversight.

Content that feels overly technical or overly corporate can struggle to engage audiences on social media platforms. Instead, firms should focus on creating content that is educational, relatable and platform-appropriate whilst remaining compliant.

Consumer Duty actually supports this approach. The FCA wants firms to communicate in ways consumers can genuinely understand and engage with, rather than simply publishing technically correct but ineffective content.

The firms doing this best are typically:

- Building recognisable personal brands
- Using short-form educational video
- Explaining financial concepts in plain English
- Separating awareness content from advice or recommendation content
- Using clear escalation routes for enquiries that become regulated conversations.

The goal is not just reach or engagement, it's understanding.

Sometimes, a post that genuinely helps one person understand something is far more valuable than a post with high engagement but little clarity. Trust and understanding are often built gradually through consistent, useful communication over time - particularly in financial services.

Compliance and engagement do not have to be opposites, but firms do need governance frameworks designed for modern social media, alongside those for traditional brochure-style marketing.

Question 3:
If the FCA and ASA rules are the same for every regulated firm, why are compliance networks giving different social media guidance?

Answer:
This is one of the biggest frustrations in the market, and it comes up repeatedly.

The FCA and ASA rules apply consistently across regulated firms, but networks and compliance providers interpret risk differently. That means advisers can receive very different guidance despite operating under the same regulatory framework.

It's important to recognise that different firms have different business models, governance structures and risk appetites, so some variation in approach is understandable.

Some networks take a highly restrictive approach because:

- Social media is fast-moving and harder to supervise
- There is concern around evidencing approvals and audit trails
- User comments and engagement can create unintended promotions
- The reputational risk of non-compliant viral content is high.

The challenge is that inconsistent interpretation can create confusion for advisers and uneven customer experiences across the industry.

Ultimately, advisers must follow their firm's or network's policy, even where another network permits different activities.

More practical guidance and greater consistency across approaches would likely help advisers feel more confident navigating social media activity.

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Question 4:
Scenario: An IFA working for a regulated firm is in an open social media discussion (typed) when someone asks if anyone can refer an IFA.
Questions: How should the IFA respond? Is there a danger that they fall foul of financial promotions? Would the firm also come under scrutiny?

Answer:
There is a subtle but important distinction between participating in a public discussion and making a financial promotion.

Simply identifying yourself factually as an adviser may present lower regulatory risk. However, once the response includes invitations to engage, direct contact prompts, offers of help or service references, it's more likely to be viewed as promotional activity and therefore fall within the firm's financial promotion and approval framework.

Public forums can also blur the line between general information and what may be perceived as a personal recommendation or endorsement from a consumer perspective, particularly where conversations become more specific or personalised.

In practice, many firms would therefore expect even relatively light-touch responses on social media to fall under their social media policy and supervision arrangements.

The safest approach is usually to:

- Keep public responses factual and proportionate
- Avoid discussing suitability publicly
- Move detailed conversations into approved private channels
- Ensure activity aligns with the firm's documented approval process.

Firms should also consider how comments and replies are monitored and retained from a record-keeping perspective.

Question 5:
Can you use the same post (e.g. a video explaining income protection) across multiple platforms?

Answer:
Yes, you can generally repurpose the same core content across multiple platforms, and many firms should do exactly that for efficiency and consistency.

However, it's usually best to adapt, rather than copy identically, as each platform has different:

- Audience expectations
- Engagement levels
- Algorithms
- Risk dynamics
- Formatting styles

For example:

- LinkedIn may support a longer explanation
- Instagram may need shorter captions and subtitles
- TikTok may require a shorter opening and more native editing style
- Facebook may perform better with a community-focused context.

From a compliance perspective, firms should also consider whether:

- Disclaimers remain visible on each platform
- Captions truncate important information
- Audio-only claims are appropriately balanced
- Platform-specific editing changes the meaning or prominence of risk information

A short educational video on income protection can absolutely work across all platforms, but it should be tailored to the environment rather than duplicated word-for-word everywhere.

While format and delivery may change by platform, the underlying tone, values and messaging should still feel consistent.

You can also use tools like Canva to resize posts to fit each platform's sizing conventions.