Government
Communication
Service

Guidelines for influencer marketing

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Introduction

This document provides guidelines on how to work with online influencers from a paid-for perspective.

Influencer marketing is when brands partner with individuals who have an engaged online following. This can include social media influencers, podcasters, professional experts, celebrities, and everyone in between.

Influencer marketing is a credible paid communications channel, which should be considered for government advertising campaigns alongside established online and offline channels.

Influencers can be effective in reaching audiences that the Government and traditional marketing channels find hard to reach. If used in a transparent way, influencers can create personalised and engaging content for your campaign. However, if used incorrectly, public confidence in government communications may be eroded. As with any government communication, it's paramount the content produced with influencers is trustworthy, accessible and represents value for money for the taxpayer.

Influencer marketing is a fast evolving form of communications. This document aims to provide guidance to help GCS members work with social media influencers in an effective, professional and transparent way.

Defining ‘influencers’

Influencers should be defined by:

- Their power to affect the decisions of others because of their authority, knowledge, position, or relationship with their audience. This could be purchasing something, inspiring someone’s views/ behaviour on something or following a call to action to support a campaign.
- A social media following in a distinct niche, with whom they actively engage.

Influencers increasingly self-define as ‘content creators’ and can be divided into four different categories, based on reach and follower numbers:

- Celebrities with 500,000+ followers
- Macro-influencers with 30,000 to 500,000 followers
- Micro-influencers with 5,000 to 30,000 followers
- Nano-influencers with 500 to 5,000 followers

It is worth noting that these are approximate and that the threshold for each category can differ depending on the platform.

Why use influencers?

Influencers create value for campaigns in two core ways:

- As a communications channel, by using their reach to get a message out to a new, engaged audience. This can help shift brand perception by borrowing the authenticity of the influencer to communicate brand messages to the public.
- As content creators and entrepreneurs, a cost effective way/means to create the types of content consumers are used to seeing from their friends rather than brands, and immediately are more likely to engage with. It is also possible to negotiate the rights to the content so it can be used on owned channels.

The following pages outline possible reasons for using influencers in a campaign.

01 Trust

Influencers can offer a highly effective way of reaching certain audiences - especially audiences that do not engage with traditional media channels and often have low trust in government communications.

People are more likely to trust someone who they perceive as being “like them”. This shared identity can enhance the credibility of the message and make the audience more receptive.

Case study: African swine flu prevention

The Department for Environment, Food & Rural Affaird (DEFRA) worked with a Romanian community influencer to create video content. The objective was to raise awareness of a potentially unpopular government message around preventing African swine flu by restricting personal imports of pork products from eastern Europe. Campaign materials and the GOV.UK link was shared to 19k Instagram followers and the creation of credible, non-traditional content saw 100% positive sentiment in social media comments. Surrounding activations such as radio adverts in English and Romanian, paid advertorials and earned media coverage bolstered the message’s reach via a trustworthy voice.

Campaign image

02 Relatability

People often resist being told what to do, especially if the message comes from an authoritative or impersonal source like “the Government”. However, if the advice or suggestion comes from a relatable influencer, it can feel less like a directive and more like a shared discovery or recommendation.

Case study: Visit Britain

Visit Britain collaborated with 12 influencers on content which would inspire audiences to consider visiting Britain in 2022. Influencers shared content before and during their travels, presenting their visits as new discoveries to share with their audiences across different channels. At least 70% of their following consisted of the target audience: high value 25-45 year olds in the biggest opportunity markets. The campaign performed strongly against its key performance indicator (KPIs), reaching a total of 65.7M people.

Campaign image

03 Social proof

Behavioural science suggests that when people see others engaging in a particular behaviour, especially those they perceive as similar to themselves with a shared social identity, they are more likely to deem that behaviour as desirable. Bandura's Social Learning Theory sets out that people can learn new behaviours by observing others. When influencers, who are essentially role models, exhibit a behaviour, their followers are more likely to imitate it, especially if they see that behaviour leading to positive outcomes.

Case study: One Step Greener

The Cabinet Office worked with influencers to increase awareness of the COP26 Summit and to encourage the public to take up green behaviours. Influencers showcased the big or small steps they were taking to tackle climate change, highlighting the action regular people could take through relatable content. The overall perception of the audience was that 'people like me' are taking action (24%-29% among young families) and the campaign, using the hashtag #OneStepGreener, saw 377k+ mentions, 390m impressions on social media, and 17m+ views on TikTok.

Campaign image

04 Ability to explain complex messaging

You might also consider working with influencers if you have complex messaging that longer form content can help to explain. If a campaign has strong awareness, an influencer campaign can help deepen understanding.

Case study: Help For Households

The Help for Households campaign used three different influencer segments - lifestyle, financial education and family-focussed - to aid understanding of the government's cost of living support and tips for saving energy. This allowed influencers to reach varied demographics with audience-specific messaging in longer form content. 11 influencers published 49 posts over three weeks across multiple channels, altogether reaching 782,000 people with 6.3 million impressions and a 2.6% engagement rate, exceeding industry standard and achieving overwhelmingly positive sentiment.

Campaign image

05 Emotional resonance

Influencers typically share personal stories and experiences which resonate emotionally with their audience, in contrast to “typical” Government communications (some of which make use of emotion to varying degrees of success but without that personal connection that creates a perception of authenticity). Emotions play a critical role in decision-making and behaviour, so a message that strikes an emotional chord can be more effective in driving behaviour change.

Case study: Every Mind Matters Loneliness

The Department for Culture, Media and Sport (DCMS) set out to encourage young audiences aged between 16-34 to ‘lift someone out of loneliness’ by partnering with a diverse group of three macro-tier (40k-200k followers) and two micro-tier influencers (10k-40k followers). The influencers created Instagram reels and posts to share personal experiences and fostered authenticity and relatability directly with the target audience. The more personal approach resonated with individuals, overdelivering against engagement KPIs by almost 1,000% and immediately driving 350 new followers to DCMS social media channels.

Campaign image

06 Expert opinion

Influencers with expertise in a specific area can lend a campaign credibility and help reach a target audience interested in that topic.

Case study: Avian Influenza

DEFRA partnered with six influencers from farming and hobbyist backyard bird keeper communities, who had trusting and highly specific followers. The objective was to create content which would raise awareness of the risks of bird flu, as well as providing guidance and driving action. Across 48 pieces of content, almost 115,000 people were reached with over 170,000 views and over 7,000 engagements.

Campaign image

Agencies & procurement

Agencies are the gatekeepers of the agreement between the client (you) and the influencer and provide coordination of approvals, timings of services and receipt of payment. They can advise on your strategy, identify relevant influencers, negotiate, contract and evaluate any activity.

Given the vast variety of influencers, there is a wide range of agencies that represent and work with them. The type of agency used will depend on the campaign and its target audience, as well as the commercial contracts your organisation holds. Agencies will be skilled at sourcing the right influencers for the right projects. Creative, PR, partnerships and multicultural agencies will all hold relationships with different types of influencers. A media planning agency can recommend influencers as part of your media mix if appropriate for your campaign.

As with any communications activity, you must make sure you are using a commercially compliant route when contracting an agency to deliver paid influencer marketing. Influencer activity falls under the Crown Commercial Service's framework, Campaign Solutions 2 (RM6125) - Lot 1. Speak with your local commercial team if you have any questions.

If you use influencers regularly, you could consider using a specialist influencer agency by subcontracting them via a Lot 1 agency.

To note: media buying under the Crown Commercial Service's framework for Media Services (RM612) does not cover influencer work as it is defined as content creation, which is currently out of scope of this framework.

Contracting

Agencies will contract individual influencers, but when reviewing contracts here are some key points to consider:

1. Review the types of content the influencer will create and which channels they will use. Relatedly, you should confirm if this activity is part of a broader PR package and you would like them to act as a spokesperson for the campaign.

2. Right to request amends and reshoots - so you can push back on content that does not meet your brief. Typically two rounds of amendments should be included in the contract.

3. Right to own the content or licence it for a period - so content can be used on paid, owned and earned channels. Owning the content outright, rather than licensing it, is often easier to negotiate with smaller content creators than larger ones. If you licence content, be clear on what you want to do with it so you can secure the correct usage rights - most crucially if it will be used in paid activity.

4. Brand non-compete period - you may wish to determine whether influencers can work with other brands during your campaign period.

Costs

When it comes to paying influencers, it is important to consider them as any other form of advertising and not expect influencers to provide pro bono support. Expectations that influencers will work for free can break down relationships. It is reasonable to reimburse influencers fairly for their time.

Influencer costs can vary widely based on your campaign, the key messages, the platform, and the amount of content you are commissioning. It is usual to negotiate a package of content with an influencer. Prices per post can start around £100 with smaller creators, but can easily reach several thousand pounds depending on audience size and deliverables. Typically, a talent agency will add approximately 25% for management, with influencer strategy, vetting and reporting incurring additional fees. If you would like to discuss costs then please contact the central GCS team who can help you benchmark. Please refer to the GCS propriety guidance on paid publicity.

As with any other paid for media channel, you are expected to publish overall campaign costs in transparency reports (we do not publish individual payments).

Selecting influencers

Your overriding priority must be securing value for money. The cost must be justified and proportionate to the goals of the campaign.

The type of influencer you choose to work with will depend on your objectives and budget. For example, if you're seeking to increase brand awareness, an influencer with a large following can help you reach a broad audience. If you're seeking to increase understanding of a topic amongst a narrow target audience, an influencer with fewer followers but with high engagement rates may be more cost-effective. Working with a range of influencers can ensure your campaign is representative.

Ultimately you want to work with influencers whose interests, values and followers align with your campaign. When selecting influencers, you and your contracted agency should look at the following criteria:

- **Credible campaign connection** - selecting relevant influencers increases the likelihood of effectively reaching the intended target audience and effectively conveying the campaign message
- **Diversity and inclusion** - the influencers you work with should be truly representative of your audiences; it is important to make efforts to diversify the pool of influencer talent with which we work
- **Geographic representation** - depending on your campaign audience, ensure your selection of influencers are spread across the country
- **Content quality** - look at influencers' content and assess the quality and frequency of content
- **Audience relevance** - their followers need to match your target audience so ask for demographic information
- **Audience authenticity** - evaluate an influencer's audience by looking at their follower to following ratio and check for suspicious accounts
- **Engagement levels** - look at the average number of engagements an influencer's content receives
- **Reach** - ensure they have quality reach in proportion to their audience size. Agencies will have tools that can estimate the reach per post the influencer has

Due diligence

Rigorous checks of influencers' online profiles are required before any activity goes live to ensure any partnership does not represent a risk to the Government.

The key piece of legislation regarding due diligence is the Regulation of Investigatory Powers Act 2000 (RIPA). This legislation puts some restrictions on Government officials investigating private citizens, for example using personal social media accounts to conduct due diligence is not permissible. Instead, due diligence should be carried out by an agency. Check what type of due diligence your agency undertakes as part of their standard protocol. Consider asking them to check the following:

- **Avoid conflicts of interest** - influencers should not have personal or financial ties that may affect their objectivity in promoting a campaign
- **Google search** - analyse up to five pages of headlines and content from the creator
- **Profile review** - check twelve months of the influencer's content across key platforms to identify content which may prove problematic if associated with your campaign, use the principles of the GCS SAFE Framework as a guide, for example:
  - No explicit sexual, drug or violent or fighting content
  - No risk of advertising appearing alongside contradictory or related satirical content, for example any news style content or where politics has been mentioned
  - No history of monetising unsuitable content, or funding undesirable or banned individuals/organisations within the last twelve months
- Influencers should not be excluded solely on the basis of an opinion they have expressed relating to their political beliefs, as this can be seen as impacting their right to freedom of expression
- You may also have further content that you will need to check for, based on your Department's policy areas

If you are a ministerial department then Ministers or Special Advisers should clear influencers unless they have explicitly delegated those decisions.

Suitable platforms

Broadly speaking, in deciding whether to undertake activity on any digital platform, GCS asks three questions:

1. First, does the activity represent value for money for taxpayers, and is it justifiable as a use of public funds?

2. Second, does the digital environment meet the ethical standards for digital safety set out in the GCS SAFE framework?

3. Third, are there risks to data protection, information security or national security, for example as advised by the Information Commissioner's Office (ICO), or other government functions?

Your final approach should always be based upon weighing each of these principles against the potential value of a particular platform.

Working with influencers

It is worth mapping out ways of working with influencers early on. For example:

1. The client (you) provides a brief with key messages
2. The influencer provides a short treatment for their content for feedback - this does not need to be lengthy, but should give a sense of tone and messaging
3. Two rounds factual accuracy checks
4. The influencer provides reporting metrics to agency

While it's important to maintain some control to ensure consistency with key messages, often a collaborative approach with talent, which is flexible enough for them to be creative, will result in stronger content. Influencers understand their audiences better than anybody else.

On sensitive subject areas, where there is the potential for influencers to receive negative commentary, you should consider what advice is provided upfront from a duty of care perspective.

Briefing

It is important to set out the key messages, call to action, timeline and content deliverables in your brief.

For further guidance on how to brief influencers, see annex B. Agencies will also be able to provide briefing templates.

Best practice

The Incorporated Society of British Advertisers (ISBA) recently published a Code of Conduct for Influencer Marketing which aims to standardise guidance with brands, agencies and creators. It provides a helpful guide to best practice.

As platforms emerge and formats evolve, so does the regulatory environment, so it is important that all communicators stay up to date on requirements.

Working with influencers

Labelling content

- Make sure 'advert' or '#Ad' is clearly visible at the start of any paid for influencer content and it is obvious that it is paid for by the UK Government or part of a government campaign (for example, clearly labelling the content with campaign name).
- The UK Code of Non-broadcast Advertising and Direct & Promotional Marketing (CAP Code) is the rule book for non-broadcast advertisements, sales promotions and marketing communications. Section 2 of the CAP code states that all marketing communications should be easily identifiable as such
- The Competition and Markets Authority (CMA) and Advertising Standards Authority (ASA) have published guidance for making sure content is labelled correctly
- They recommend labels that make it clear the content is paid for, such as: #Ad #Advert #Advertising #Advertisement. It's not necessary to use a '#' as part of the label, provided it is prominent and clearly separate from any other content
- As any label used needs to be understood by consumers and make immediately clear that content is advertising, they advise against using: Supported by/ Funded by, In association with/ In partnership with Thanks to [brand] for making this possible

Monitoring performance

- It's important to monitor how influencer content is received - your agency should update you on the sentiment around any comments
- You may wish to provide influencers with FAQs so they can answer questions from followers. You can also consider providing influencers with unique UTM codes so you can measure the traffic to your website from their posts
- Before any content goes live make sure you have engaged your press office and have approved lines to take. See Annex A

Evaluation

Influencers will report engagement results and metrics to enable you to evaluate performance. As with any campaign, follow the GCS Evaluation Framework and measure outputs, outtakes and outcomes

Annexes

Annex A: lines to take

- As a responsible government, we use all the communications channels necessary to ensure the public has the information it needs.
- Influencer marketing is a credible paid communications channel, which is used in government advertising campaigns when it can help us reach our target audience.
- All costs involved in the campaign will be published as part of the regular transparency reports on gov.uk.

Annex B: Briefing template

Campaign Overview

Overview of the project and what it aims to achieve.

Campaign Objectives

Outline key objectives of the activity.

Key Messages:

1. Outline the message(s) that are key for the influencer to demonstrate, in order of importance.
2. What is the call to action and where is the content clicking through to?

Deliverables

Outline the minimum deliverables you expect:

For example;

- **Deliverable 1 for example Reel**

Top line information about what you'd like this deliverable to include and convey

- **Deliverable 2 for example Static**

Top line information about what you'd like this deliverable to include and convey

- **Deliverable 3 for example Story**

Top line information about what you'd like this deliverable to include and convey

Content Guidelines

Any specific guidelines around the content, including tone of voice, style of shooting, mandatory elements and anything that's off limits.

Remember: while it's important to maintain some control to ensure consistency with key messages, often a collaborative approach with talent, that has flexibility for their creative input, will result in stronger content with better engagement. Influencers know what their audiences prefer.

Briefing template

Do's & Don'ts

Please add any further specific do's and don'ts -

- Do follow the ASA guidelines to their full extent
- Do make the content feel real and authentic to your personal brand
- Do include the #ad in your post
- Do use the paid partnership tag and make it clear the content is in partnership with UK Government/department
- Don't include pictures/references to alcohol or drugs
- Don't have any brands in shot
- Ensure content isn't easily dated

Timeline

Include a clear timeline

- Content Submission Date
- Amends Feedback Date
- Final Approval Date
- Campaign Live Date

Note, timings can change depending on final deliverables negotiated. Suggested timing plan and staggering of assets to be delivered upon deliverables agreement.

Mentions

Any handles, hashtags or keywords to be included in captions or assets. Keep consistency across all content.

Content Usage Rights

By participating in this campaign influencers allow the use of their content for this campaign as follows:

- Media/channel
- Licence term

Further Background

Any further information regarding the brand that will be useful to the creator.

OGL

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