**Influencer due diligence policy**

**Summary**

Our mission is to deliver world-class public service communications which support ministers’ priorities, enable the efficient and effective operation of public services, and improves people’s lives. All campaigns, including any influencer activity, should deliver on at least one of these objectives. To ensure influencers are an effective channel for a campaign it is important that due diligence checks are carried out. It is expected that departments ensure agencies follow this policy when undertaking due diligence checks on behalf of His Majesty's Government (HMG).

The purpose of carrying out due diligence checks on influencers is to ensure that individuals whose social media profiles and content could undermine a campaign are not engaged.

As government communicators our priority should be to use the best channel to reach our audience in order to have the most impact. It is, therefore, important you follow these steps when selecting influencers for campaigns:

1. Determine the size, reach and demographics of the influencer’s following to ascertain whether they will be an effective channel for HMG to use to promote a particular policy.
2. Check if they have produced unsuitable content that government messaging should not appear next to, using the principles of our [SAFE Framework](https://gcs.civilservice.gov.uk/publications/safe-framework-the-4-principles-for-hmg-brand-safety/) as a guide.
3. Check whether the influencer has publicly communicated on political issues recently (in the last 12 months), at a high volume (monthly or more) and in such a way that may become a story in its own right.

If an influencer has produced content as outlined in 2, it is important that you do not proceed to work with them. Content identified in 3 should be considered if it has the potential to undermine the effectiveness of the campaign - with the government’s choice of influencer attracting attention, rather than the campaign message itself. This means that the influencer’s political views, as expressed in their content or in the media, carry a reasonable risk of creating media coverage that would undermine or detract from the campaign.

A contradiction between an influencer’s publicly stated political views and their involvement in a campaign will likely attract media interest. For example, engaging an influencer, who has publicly been critical of the Home Secretary, to promote a Home Office policy.

Reviewing this information will allow you to objectively and impartially assess whether working with an influencer would undermine your campaign, before you engage them, and ensure that you do so in a fair and proportionate way. Further detail on what content to look for is outlined below.

**Due diligence checks**

It is important that you carry out a reasonable and proportionate search of publicly-available content published by the individual and any media coverage featuring the individual. This will include reviewing their social media channels and websites, as well as media and news sites.

Campaign managers should view:

* **Search results** - Up to five pages of search results, as well as looking through any notable links such as media articles produced on a search page.
* **Profile review** - Check twelve months of the influencer’s content across key platforms.

These time frames will allow you to get a thorough sense of whether an influencer has produced content or expressed views that could undermine a campaign, for example contracting an influencer for a ‘stop smoking’ campaign that has produced recent content of them smoking.

Due diligence checks should be conducted by civil servants or contracted agencies according to these criteria. These checks will then inform a decision to engage the influencer, which may need to be signed off by a Minister. This should be agreed on a departmental basis.

**1. An influencer’s following**

To ensure your messaging reaches its audience effectively, you need to work with influencers whose interests, values and followers align with your campaign messaging. 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.

When selecting influencers, you should look at the following criteria:

* **Audience relevance** - Their followers need to match your target audience so ask for demographic information (age, gender, and location).
* **Reach** - How many followers do their profiles have and how many people on average are viewing and engaging with their content.
* **Credible campaign connection** - Selecting relevant influencers increases the likelihood of effectively reaching the intended target audience and effectively conveying the campaign message. As part of this you should check if an influencer has produced content or has publicly commented on the policy your campaign is seeking to promote - you should check for both positive and negative commentary. For example, an influencer who produces content denying climate change is unlikely to be suitable for a net-zero campaign.

**2. Unsafe or unsuitable content**

When conducting due diligence, you should use the principles of our [SAFE Framework](https://gcs.civilservice.gov.uk/publications/safe-framework-the-4-principles-for-hmg-brand-safety/) as a guide.

Firstly, establish the baseline brand safety standards of the environment - which in this instance is the influencer’s profile. Safety checks involve ensuring that content within the environment is not likely to endorse or promote any illegal activity, harmful behaviours, and attitudes, or cause serious offence to individuals and/or protected groups. It is not possible to provide an exhaustive list of the type of statements which would fall within these categories.

They may include but are not limited to:

* Views which promote or incite hatred or intolerance against others on the basis of protected characteristics as defined under the [Equality Act 2010](https://www.legislation.gov.uk/ukpga/2010/15/contents).
* Views which are gratuitously offensive, indecent or obscene.
* Speech or conduct that constitutes bullying or harassment of those protected under the [Equality Act 2010](https://www.legislation.gov.uk/ukpga/2010/15/contents).
* Threats of, or incitement to, violence.
* Threats of, or incitement to, or support for terrorist activity, as defined in the [Terrorism Act 2000](https://www.legislation.gov.uk/ukpga/2000/11/contents).
* Content that features sex, drugs or violence.
* Content funded by political parties.
* Once an environment has been established as safe, you need to ensure that the environment is appropriate for HMG advertising. This includes considering the message of the campaign and the contexts that could cause reputational harm or embarrassment to HMG.

As part of establishing suitability, GCS accepts that there will be some categories of content that are not generally suitable for HMG while recognising the rights of other advertisers to advertise against this kind of content.

**3. Political commentary**

Check whether the influencer has publicly communicated on political issues recently (last 12 months), at a high volume (monthly or more) and in such a way that is likely to become a story in its own right and undermine the campaign.

The communication to check may include:

* support or criticism of the Government or a Ministerial department
* support or criticism of the opposition, or any other political party
* support or criticism of a national politician, such as the Prime Minister, a party leader, a Minister, a member of the House of Lords, an MP.

Any exclusion of an influencer should be based on the needs of the specific campaign. The blanket exclusion of an influencer from all campaigns based only on views they have expressed, for example criticism of government policy, would be significantly more difficult to justify under human rights and equality legislation.

**Data Protection**

Any department collecting personal data on influencers for the purpose of due diligence checks will be a data controller and must follow the requirements set out in data protection law. You should take advice from your legal and data protection teams, and you will need to complete a Data Protection Impact Assessment and a Privacy Notice in accordance with your organisation’s policies.

The minimum of personal data required should be retained, which should be limited factual information. This can be achieved, for example, by campaign teams only recording potential

The minimum of personal data required should be retained, which should be limited factual information. This can be achieved, for example, by campaign teams only recording potential issues identified, otherwise it should be noted that no relevant content was identified. Any information relating to this search should be kept for the period defined in your Privacy Notice. When processing information this needs to be compliant with the Data Protection Act, [UK GDPR](https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/data-protection-principles/a-guide-to-the-data-protection-principles/the-principles/storage-limitation/) and departmental retention policy.

It is recommended that campaign managers use the ‘Due diligence checks template’ (Annex A) to record any conclusions. It is your department’s responsibility to follow this process.

**Public procurement**

Contracts directly with influencers or with creative agencies are likely to engage public procurement rules. Generally, public procurement law only allows (and in some cases requires) the exclusion of suppliers on certain specified grounds and requires compliance with the principle of non-discrimination. Nothing in this policy is intended to cut across those procurement rules and where you are considering excluding an influencer or media agency from a competitive process for the award of a contract, particularly one which is required to be advertised on the ‘Find A Tender’ Service platform, please consult your departmental commercial team before doing so.

Departments should notify us when they are required to disclose the policy publicly (e.g. in response to an FOI request or legal proceedings), by emailing [gcs@cabinetoffice.gov.uk](http://gcs@cabinetoffice.gov.uk).

**Annex A: Due diligence checks template**

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| --- | --- |
| **Contact details** | |
| **Department name** |  |
| **Name and contact details of individual completing due diligence check** |  |

|  |  |
| --- | --- |
| **Campaign details** | |
| **Campaign name** |  |
| **Start date** |  |
| **Campaign detail** | Brief description and key messages |

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
|  | **Summary of due diligence check** | **Decision to contract?** | **Reasons** | **Date action Completed** |
| **Influencer name** | a) Audience relevance (including their follow demographics), reach, campaign connection - include only factual information  b) Please note any unsafe or unsuitable content - include only factual information. (if nothing relevant identified, record N/A)  c) Please note any political commentary relevant to the campaign. You must include a brief explanation of why this commentary is relevant to the particular campaign (if nothing relevant identified, record N/A) | Y/N | Set out the reason for your decision, with reference to your findings |  |
| **Repeat the process for each influencer using copy and paste to create new rows.** | | | | |