

How to Ensure Influencer Marketing Campaign Quality Assurance and FTC Compliance



At Sway Group, we have spent years establishing best practices for verifying quality assurance (QA) and FTC compliance for all our sponsored campaigns. In this guide, we're sharing the basics for developing your own influencer QA rule book to cover everything from brand messaging to proper disclosure language.





# **Rules of Engagement:**

### QA drives performance

Every influencer marketing campaign should include the ability to quality-check the content, both during the development process and after it goes live. Checks can cover a range of validations: usability, graphics, storyline, brand messaging quality, link and asset inclusion, and so on.

### Why is QA so important?

You want to be sure your influencer content is getting knocked out of the park each and every time. From compelling visuals to language that resonates, great content is what gets liked, shared, and engaged with. And this content needs to be correct.

Making sure your campaign meets brand quality requirements is a critical step, and it's not just for catching bad links, low-res photos, or typos. Today's influencer content must comply with current Federal Trade Commission's (FTC) endorsement guides or your brand is at risk of being in violation of the Federal Trade Commission Act.



## **QA Basics:**

#### It all starts with a brief.

Before you can check for quality, you need something to check against. Once campaign goals are established, a detailed influencer brief can be created.

#### What gets included in an influencer brief?

In a nutshell: everything. An influencer brief, at minimum clearly outlines the campaign goals, key products and brand messages. Further details can include content prompts, a theme outline, what not to include (i.e., messaging to avoid), detailed social share requirements such as links, hashtags (and who to tag), image direction including brand assets and sample photography, deadlines, exclusivity and licensing requirements ... to name a few. Plus, those all-important FTC disclosure guidelines.

#### Why is an influencer brief necessary?

This detailed brief becomes the campaign's north star. Not only does it reduce any confusion about campaign goals and expectations, it also means that influencer-created content can be appraised in a quantifiable manner.

#### What's the best way to quality-check against the brief?

There's no one-size-fits-all answer to developing a solid influencer marketing QA process — that depends on the size of your team, the number of stakeholders, the scope of the campaign, and so on. At Sway Group, we have dedicated QA experts who personally review every single piece of content at various stages in each client's program. We evaluate influencer content against the requirements outlined in the campaign brief and also review for both FTC and platform compliance (more on this in the next section).

Regardless of workflow, we highly recommend building at least one review checkpoint prior to content going live into every campaign so that any issues can be discovered with built-in time to make adjustments. If that's not do-able, at a minimum, we suggest reviewing content within 24 hours of publication.

## In the Words of the FTC:

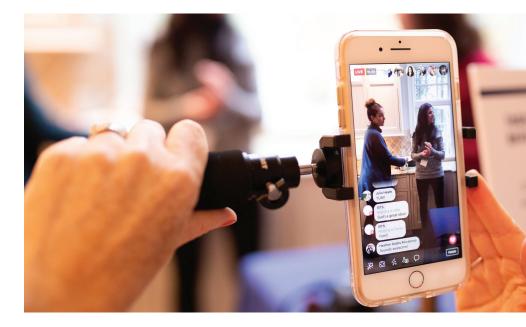
An endorsement must reflect the honest opinion of the endorser and can't be used to make a claim that the product's marketer couldn't legally make.

## **FTC Compliance:**

Campaign instructions should specifically address FTC requirements, and if influencer content gets published without disclosure, posts should be immediately updated or removed.

## How to properly disclose a sponsorship.

While there is often a lot of confusion surrounding legal compliance guidelines for influencers, the instructions are clearly outlined in the FTC Endorsement Guides.



## Best Practice Tips for Disclosing Sponsorships:

#### Disclose up front.

The disclosure should come before there are any links to the brand's website or other brand content – including sponsored posts on the influencer's site – so that readers are aware before they click through.

Sway Group encourages influencers to include a disclosure statement in the first paragraph of their post, while providing a clear disclosure along with calls to action at the bottom as well.

#### Be clear and conspicuous.

The FTC says "advertisers should use plain and unambiguous language and make the disclosure stand out." Disclosure should be placed where it easily catches consumers' attention, and language should be clear-cut, i.e.: "This post is sponsored by Brand X."

When in doubt, check the current endorsement guides. The FTC website has a wealth of information for staying in compliance.

#### Get the hashtags right.

While the FTC doesn't mandate specific wording of disclosures, the fact that an influencer has been paid (or received free product) must be clearly communicated. The key is to make sure audiences get the information they need to evaluate sponsored statements, which can be as simple as "Brand X gave me this product to try, and here's my review." On social media, using the word "AD" "#AD" "AD:" or "Sponsored" is sufficient, which is why we require our influencers to include "AD" in every social media post.

#### Avoid popular (but inaccurate) disclosure buzzwords.

You've likely seen variants of "#sp", "#spon", and "#paid" used in influencer campaigns, but these terms do not meet FTC guidelines. If it isn't obvious to general audiences that it's sponsored content, it won't work. "#Collaboration" and "#partnership" will also likely fail to meet the required level of disclosure for the same reason.

# **Creative Freedom and Brand Requirements:**

### When to request edits.

Influencer marketing works because of the credibility and connection that influencers have built with their audience. Their aesthetic, their voice, their style: something about them resonates with their followers, and campaigns should allow them the freedom to be their authentic selves. When brands are overly restrictive with content guidelines, sponsored posts don't feel like recommendations from trusted friends ... they feel like ads.

That said, while brands should steer clear of micromanaging the influencer content ideation and creation process, influencers should be held to the business goals and guidance provided in the campaign brief.

## What's fair game for editing?

Given the big picture goal of implementing influencer content in a way that feels organic and relatable to audiences, it can be challenging to determine when to request edits and photo (or even video) reshoots. Brand teams definitely have the ability to revise and redirect influencer content — without, hopefully, nit-picking over tone and style.



# When To Ask for Edits (and When Not To):

These are general guidelines; every influencer partnership is different and some may include more back-and-forth than others.

Influencer Content Issue	Acceptable	Not Acceptable
Influencer has not provided clear disclosure in accordance with FTC guidelines	$\checkmark$	
Influencer is missing content and/or key messages that are clearly outlined in the campaign brief	$\checkmark$	
Content (photos and/or text) violates the terms outlined in the campaign brief	$\checkmark$	
Content includes spelling/grammar errors, broken links, other errors	$\checkmark$	
Photos do not comply with the brand guidelines outlined in the campaign brief	$\checkmark$	
Client makes the decision to void/strike a photo, without requesting the influencer reshoot or replace the photo in question	$\checkmark$	
Client wants to alter the influencer's writing style or personal aesthetic		$\checkmark$
Client wants photo reshoots based on information that is not outlined in the campaign brief		$\checkmark$
Client perceives brand aesthetic and/or brand guideline violations that are not outlined in the campaign brief		$\checkmark$



### The bottom line.

Be very clear when you communicate campaign goals, and ask influencers to follow disclosure guidelines exactly. Once you prioritize those initiatives, the rest of your influencer QA processes will be much easier to develop.

By focusing on quality assurance, your influencer campaigns are likely to be more meaningful and provide valuable perspectives. Over time, you can use what you've learned not only to determine the success of a given campaign, but to help shape your future content strategies.

## Quality comes from communication.

Ideally, brands should have the ability to maintain efficient influencer communications throughout a campaign. A strong influencer connection not only means better content quality, it also fosters a valuable relationship which helps brands gain insight to their target market. When resources are tight, this is where an agency like Sway Group can help with influencer management and expert QA processes that ensure best-in-class content and FTC compliance.



Interested in learning more? Contact us today to set up a free consutation.

Contact Us: swaygroup.com • 844-GET-SWAY