

Reference: 02054804

Information Requests
information.requests@ofcom.org.uk

24 September 2025

Freedom of Information request: Right to know request

Thank you for your request for information concerning the use of influencers for promoting the Online Safety Act.

We received this request on 1 August 2025 and we have considered your request under the Freedom of Information Act 2000 (the “FOI Act”). We wrote to you on 1 September 2025 to advise that we needed to extend the deadline to consider the public interest test in withholding or disclosing the information. We have now concluded this.

Your request & our response

1) Any contracts, memoranda of understanding, or payment records between Ofcom and external agencies (e.g., Zinc Network) or individuals for influencer campaigns promoting the Online Safety Act, from January 2023 to August 2025, with personal data redacted where applicable.

Whilst we do hold this information, it is being withheld as we consider that its disclosure is exempt under section 43(2) of the FOI Act. This exemption deals with information that, if disclosed, would, or would be likely to, prejudice the commercial interests of a person or company. In applying this exemption, we have had to balance the public interest in withholding the information against the public interest in disclosing the information. Annex A attached to this letter sets out the exemption in full, as well as the factors Ofcom considered when deciding where the public interest lay.

Please note that other exemptions may also be applicable.

2) A detailed breakdown of the 2024-2025 budget allocation for public awareness or influencer marketing under the Online Safety Act, including approval documents from DSIT or HM Treasury.

The Online Safety Act 2023 (OSA) is a major piece of legislation impacting hundreds of thousands of regulated services, and millions more people who go online in the UK.

As such, we consider that communications campaigns are critical in driving awareness and promoting compliance among regulated services, as well as explaining to UK adults and children how our safety measures protect them, how the rules work in practice and Ofcom’s role in enforcing them.

An NAO report - [Preparedness for online safety regulation, published on 12 July 2023](#) - specifically recommended, among other things, that Ofcom should:

- manage the public’s expectations about the regime’s impact and Ofcom’s role during implementation to give confidence in the credibility of the new regime with the public, industry and others; and

- develop its plans to inform industry about its requirements.

To note, our funding comes from fees paid to us by the companies we regulate and from the retention of Wireless Telegraphy Act receipts.

Since 1 January 2024 to the time of your request, a total of £1,137,752.58 has been allocated to communications activity to raise public awareness of the Online Safety Act. Of this, £171,100 (around 15%) was allocated to influencer activity.

This activity involved:

- Working with M&C Saatchi and Archetype to deliver B2B campaigns targeting regulated services to drive awareness and promote compliance with their requirements under the OSA;
- Working with M&C Saatchi and influencers (Anna Whitehouse, Nilly Dahlia, Lee Chisholm, Claire Warren) to raise awareness of and build confidence in the OSA among UK parents;
- Working with M&C Saatchi and influencers (Olivia Bentley, Ben Hurst, Olly Bowman, Sophia Smith Galer, Adam Beales) to deliver a campaign to raise awareness of and build confidence in age-assurance rules coming into effect among UK adults;
- Working with Eleven to raise awareness of the protection of children code measures under the OSA among UK teenagers;
- Partnerships with Mumsnet and influencers (Mylene Klass, Anna Whitehouse and Dr Martha Deiros Collado) to raise awareness of the protection of children code measures under the OSA; and
- An influencer partnership (Cally Jane-Beech) to promote our proposed guidance on protecting women and girls online.

Taken together, these campaigns and content have achieved over 30 million impressions online (the amount of times posts have appeared in people's social media feeds).

As an independent regulator, Ofcom does not require authorisation on communications spend from DSIT or HM Treasury. Therefore, this information is not held.

3) Copies of advertising scripts, social media posts, or briefing documents provided to influencers (e.g., Olivia Bentley) for Online Safety Act promotion.

Whilst we do hold briefing documents, these are being withheld as we consider that their disclosure is exempt under section 43(2) of the FOI Act. Please refer to the Q1 response above for further details.

Please refer to the links to content posted by the influencers we partnered with to promote various aspects of the Online Safety Act:

Raising public awareness of new age assurance rules coming into effect:

- https://www.instagram.com/reel/DMf_NPxNgfi/?hl=en-gb
- https://www.instagram.com/reel/DMiH_Mdl3DQ/?hl=en
- <https://www.instagram.com/reel/DMiC9aZKLQQ/?hl=en>
- <https://www.tiktok.com/@mrmelk/video/7531007210755788039?lang=en>
- <https://www.instagram.com/reel/DMPqvQvlecD/?hl=en>
- <https://www.instagram.com/reel/DL-cjD8tRrs/?hl=en>

Raising awareness of the Online Safety Act among UK parents:

- <https://www.instagram.com/reel/DIIA9qGCh9C/?hl=en>
- https://www.instagram.com/mother_pukka/reel/DH-g6-ts16B/
- <https://www.instagram.com/p/DIgpIRrs9wb/>
- <https://www.instagram.com/reel/DIb67M3s6IX/>

Promoting the Protection of Children Code measures:

- <https://www.instagram.com/p/DMh0Z5RoaeR/>
- <https://www.instagram.com/reel/C9IbkkPIVLn/?hl=en>
- <https://www.instagram.com/reel/C89KglxA1Pi/?hl=en>

Promoting our proposed guidance on protecting women and girls online

- <https://www.instagram.com/reel/DGoJlxyMkGB/>
- https://www.instagram.com/reel/DGiUJE_ox0-/

4) Minutes or correspondence from internal meetings or with government departments discussing the decision to use paid influencers for this campaign, from January 2023 to August 2025.

We do not hold this information.

If you have any further queries, then please send them to information.requests@ofcom.org.uk – quoting the reference number above in any future communications.

Yours sincerely,

Information Requests

Request an internal review

If you are unhappy with the response you have received to your request for information, or think that your request was refused without a reason valid under the law, you may ask for an internal review. If you do, it will be subject to an independent review within Ofcom. We will either uphold the original decision, or reverse or modify it.

If you would like to ask us to carry out an internal review, you should get in touch within two months of the date of this letter. There is no statutory deadline for us to complete our internal review, and the time it takes will depend on the complexity of the request. But we will try to complete the review within 20 working days (or no more than 40 working days in exceptional cases) and keep you informed of our progress. Please email the Information Requests team (information.requests@ofcom.org.uk) to request an internal review.

Taking it further

If you are unhappy with the outcome of our internal review, then you have the right to [complain to the Information Commissioner's Office](#).

Annex A

Section 43(2) of the Act provides that:

Information is exempt information if its disclosure under this Act would, or would be likely to, prejudice the commercial interests of any person (including the public authority holding it).

Factors for disclosure	Factors for withholding
• Enabling the public to gain a better understanding of the commercial relationships between Ofcom and its suppliers and the nature of the services provided, and thereby increasing public confidence in Ofcom's work. • Generally, there is a public interest in transparency of expenditure, especially if public money is involved.	• Ofcom contracts with a variety of companies in order to support its operations and has ongoing financial relationships with many of them. Companies need to be confident that information relating to their business, such as information about them as an organisation or relating to the detail of their products or services, will not be disclosed if it would, or would be likely to, prejudice their commercial interests. • Ofcom continues to negotiate and require contracts like those related to this request. To release the specific information requested would put Ofcom in a detrimental position for future contract negotiations and would undermine its bargaining position with potential suppliers. In addition, to release the detailed amount Ofcom pays for a service could prejudice the commercial interests of the supplier – in that it would provide details of the supplier's commercial relationships to its competitors or potential clients. We have disclosed above the spend where either this covers several suppliers or services so the amount cannot be attributed to a particular service/supplier. • Ofcom engages with a number of individuals, and has a financial relationship with them. Individuals contracting with Ofcom need to be confident that information relating to their services or rates will not be disclosed if it would, or would be likely to, prejudice their commercial interests. • Where Ofcom has partnered with organisations or influencers to promote aspects of the Online Safety Act, this content and the partnerships have been made public. Disclosure of internal briefing notes provided relating to this content would not increase Ofcom's transparency regarding its duties under the Online Safety Act.

Reasons why public interest favours withholding information
• We consider that, on balance, the public interest in withholding disclosure of the requested information outweighs the public interest in disclosing the information. • Ofcom enjoys a positive relationship with those companies and individuals it contracts with. The release of information which would, or would be likely to, prejudice commercial interests into the public domain would impair both Ofcom's relationship with providers of services, and adversely affect its commercial relationships with other contractors. If contractors could not be confident that such information provided by them to Ofcom would be withheld from disclosure, except in compelling circumstances, commercial activity may be impeded. Similarly, Ofcom's bargaining position, and therefore ability to obtain value for money in services it contracts for, may be undermined in future negotiations if full details about the cost of these services were disclosed. These considerations go against the public interest in disclosing. • Weighing the issues presented, it is considered that on balance, the factors for withholding the requested information outweigh those for disclosing the information.