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Branded Content Governance: Problems and Mitigations

A summary report by the Branded Content Governance Project

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1. Introduction

1.1 About this report

From influencer posts, sponsored podcasts and product placements to AI-generated ads and personalised recommendations, branded content is central to the media we use every day. As media and marketing become more intertwined, it's increasingly important to understand how this content is created, experienced — and regulated. This report sets out the summary analysis and recommendations made by the Branded Content Governance Project (BCGP). It is designed to serve as an executive summary for our analysis of 'problems' relating to branded content practices and to the governance of branded content, and 'mitigations', actions that could help to remove or reduce those problems. Our analysis is set out in greater detail in other project reports and outputs that are referenced below.

1.2 The Branded Content Governance Project

As media and marketing merge and new forms of marketing communications proliferate, are regulations, guidance, and best practice keeping pace? That is the focus of the Branded Content Governance Project (BCGP) 2022–2025.

The project investigates how branded content is treated in regulation and across all forms of governance, including how issues are reported, discussed and acted on. Our BCGP combines analysis with action. We seek to develop recommendations for governance out of our collaborative research and do so in a way that is context sensitive. What kinds of 'problems' arise in branded content practices and in the ways these are addressed in current governance? What kinds of actions, 'mitigations', can be identified that could guide effective responses in different media systems and contexts?

The BCGP is led by the University of the Arts London (Branded Content Research Hub), University of Stirling, and Complutense University of Madrid, supported by a 90+ international academic network, and industry, legal, policy and civil society partners. Our reports include Branded Content Governance: *32-country comparative analysis* which accompanies our 32 individual country reports on the laws and regulation affecting branded content across North America, the UK, all EU countries and Australia. Other publications include Mapping the *Media-Marketing Ecology*, with an interim version published in 2024 and the final version to be published as an open access book by Routledge in 2026. The project also examines practices, policy networks and trade/general media discussions in more detail in the UK and Spain, with research publications on these topics. These include *Governance-in-Practice* which draws on interviews with practitioners and our Media Analysis report that examines how issues relating to branded content governance feature in reporting and discussion across professional ('trade') and public media (news publications).

We will also be publishing *Media-Marketing and Branded Content Policy Analysis: UK and Spain*, which examines and compares the law and regulations affecting branded content in the UK and Spain and examines relevant policy processes and actors including through interviews, roundtables and other research activities. Other published reports examine advertising policy and regulation in the UK (Hardy et al 2023; Hardy 2024) as well as submissions to consultations, event presentations and the BCGP newsletter. All publications can be accessed at https://figshare.arts.ac.uk/BCG_Project.

1.3 Acknowledgements

2. Branded Content: Problems and Mitigations Analysis

This section introduces three ways in which the BCGP has mapped problem and mitigations in branded content practices and governance. The first is a summary, presented as a 'theory of change' analysis. The second is a more detailed mapping that considers different 'stages' of activity from strategic to operational and different 'domains' of activity, which include 'system' and 'societal' domains. The final mapping considers the location of governance activities: upstream, midstream and downstream. Each mapping provides its own specific focus and detail but all of them present our core analysis of problems and mitigations which is discussed further in the final section of this report.

2.1 Theory of Change Mapping

We have been working to address three areas: (1) to clarify what the BCG seeks to achieve as a project; (2) through research and discussion, to identify 'problems' and 'mitigations' in the practices and governance of branded content; (3) to put forward proposals for governance that arise from (2) and which contribute to BCG project achievement (1). To do so, we have drawn on 'theory of change' planning. This originates in international development and, as summarised by the United Nations Development Group (2017: 4) , theory of change 'is a method that explains how a given intervention, or set of interventions, is expected to lead to specific development change, drawing on a causal analysis based on available evidence'. Theory of Change is used to design, plan and evaluate strategies for projects and is especially relevant to initiatives like the BCGP that seek to combine research impact with policy recommendations to contribute to social change. Here is a short introduction and guide to the documents we are sharing now.

Our 'theory of change' mapping (table 2) aims to summarise the key problems we aim to address and the actions to do so. This involves identifying the root causes of problems, designing the activities and outputs to achieve measurable outcomes that contribute to addressing these, and identifying the impact that would be achieved. This uses a mirroring approach. The impacts should 'mirror' and align with the problems; the outcomes should match the causes they address, all informing the project activities and outputs that crystallise the 'what', 'why' and 'how' questions. The aim is to create a theory of change strategy that is problem-centred, process-driven, simplified. It is also particularly relevant for our project that the theory of change process should be collaborative, reflexive and adaptable. That is illustrated by our project team work so far and by our aim to facilitate wider engagement and deeper deliberation with key actors and stakeholders across branded content governance and industry practices.

2.2 Domains and Stages Mapping

The second framework we present is developed over three parts (tables 3,4 and 5). This seeks to provide a more elaborate mapping of 'problems' and mitigations' connected with industry practices (part 2) and policy/governance processes (part 3). The first part describes the five 'domains and stages' (five columns) and the issues and actor types associated with each.

We have adopted a 'stages' mapping that considers the production of all forms of branded content from the 'strategic' level of decision-making (i.e. corporate owners/managers) to the 'operational' level (i.e. content creators), to 'dissemination' the presentation, circulation and user engagement with content and services.

In addition to stages, we also include the wider 'domains' which influence practices and governance. These are 'system' features such as the embedded decisions of the media-marketing-adtech

ecosystem and the 'societal' domain in which various forces from civil society lobbying to public media reporting influence governance.

2.3 Governance issues across upstream/midstream/downstream

One helpful way to acknowledge the complexity of governance and regulation in the promotional media domain is to identify different styles of intervention, including different types of support and protection afforded within the media ecology. This mapping (table 6) identifies 'where' governance activities, actions for better governance can be located between so-called 'upstream', 'midstream' and 'downstream' measures. This mapping incorporates all the BCGP key recommendations but also identified broader types of governance activity.

The terms upstream, midstream and downstream can be applied to value chain creation and so to processes of production, distribution and retail of products. Policy practitioners also talk about upstream, midstream, and downstream interventions. This presents a helpful metaphor, one linked to origins in health and social policy, and discourses of prevention, symptom, and cure, but nevertheless readily applicable in media regulation and governance, especially in a context alert to 'risks' and 'harms'

Upstream tends to refer to various kinds of deep-rooted structural action, including firm policy agreements defining principles, risks, and harms. Here we situate foundational-normative statutory codes that allow regulators to apply standards in respect of social and cultural communications in the commercial-economic sphere, and where ad labelling and disclosure have traditionally formed a major tenet. This upstream activity can extend to encompass government sponsored advocacy for pervasive support, too, for media literacies, helping (sometimes vulnerable) consumers and citizens navigate the complexities of a fast-paced, noisy and at times deceptive media environment, such as we see in the UK via the statutory communications regulator Ofcom.

Midstream supports are located more explicitly in the domain of practice. They comprise mechanisms that operate in functional, operational real time to apply, uphold, and maintain—through reflection and monitoring—the engagement and compliance with regulatory systems and the structural principles that inform a strong media ecology.

Finally, downstream interventions refer to approaches necessitated by the failures, disruptions, or deficiencies of processes higher up in the system to comply with and observe rules, principles, and agreed good practices. This includes various forms of sanction and remediation, such as different types of redress and enforcement like complaints, public shaming, fines, statutory enforcement or legal action, including civil action. This also includes education and capacity-building initiatives, such as media literacies by audiences/consumers. Where

breaches of governance have not been successfully prevented, as revealed 'downstream' then interventions can include strengthening governance 'upstream' such as through strengthened legislation and statutory regulation. This underpins our recommendation for 'integrated polycentric governance' discussed in section 3 below.

2.4 Summary

Together, these tables (2-6) seek to summarise branded content 'problems' connected with marketing, communications and societies, but they do not map all the concerns for relevant actors across the media-marketing ecology, such as IP, contracting, brand safety, and other issues.

These materials do include assumptions, provisional explanations and proposals but we want them to serve as a foundation for discussion. We have used roundtable meetings, online events, surveys, interviews and communications to build up these framework documents. We have presented the research and developed the analyses that inform these recommendations in other BCGP publications and outputs. We will continue to disseminate and seek dialogue to develop our work and to seek to encourage and influence better practices and better governance as media and marketing continue to integrate.

A final point to stress is that we seek to develop an approach that is context and system sensitive at all points from analysis to action. This means generating a menu of possible 'mitigations' that are informed by a diversity of insights and which can serve those seeking to develop better governance in different contexts. To do all that, we need to facilitate and encourage the contribution to this work of all those reading this report.

Our extended analysis seeks to incorporate differences across media systems and the importance of specific contexts in which governance arrangements were developed, sustained and changed. Governance 'solutions' must be context sensitive; to work they must fit the needs and context they are proposed to serve. We echo a key point made in Hallin and Mancini's (2004: 15) media systems analysis: '[normative] questions can never be answered in a purely abstract and universal way. It is not clear that media models that "work" in one context would also "work" in another very different one'. Applied to our work. it must not be assumed that any component of governance that works effectively in one system can be uprooted to fit and work effectively in another. This is not an argument against common standards, rules and processes, including harmonisation across multinational systems like the European Union. Rather, it is an argument to incorporate into analysis all the relevant historical, contextual factors that may shape recommendations for better governance and to support democratic policymaking to select their implementation. We seek to contribute to the broader tasks of assessing how policy and governance processes are influenced and work in actual, complex, networked, situated contexts.

3. Problems in Branded Content Practices and Governance

Throughout most of the 20th century, advertising and media were separated by laws, self-regulation, and professional norms. Over the last thirty years, formats blending advertising and media have grown, raising challenges around disclosure, identification of marketing communications and the separation of advertising and non-advertising in communications. The issues include how to identify sponsorship in podcasts, publishing and audiovisual content, how to regulate influencer marketing, and how to apply and enforce rules across platforms, marketers, adtech, media providers, and creators.

3.1 Branded Content: Four Problem Areas

Our project identifies four key problem areas: consumer identification of advertising, the impact of integrated advertising on media quality and integrity, limits on marketers' power to dominate communications, and the capacity of creative workers to act ethically.

The following section summarises the problem areas and our mapping of how these manifest in policy action and discourses overall.

1. Consumer/users' lack of awareness of commercial intent.
2. Detriment to media quality: editorial and aesthetic independence.
3. Marketers' power and share of voice.
4. Cultural production capacity diminished for professionals/ creators (precarity, perceived lack of agency, confidence, support).

The lead 'problem' concerns the labelling and identification of marketing communications. Consumer responses to the European Commission's public consultation on consumer law show a high level of experience, and concern, about insufficient disclosure of commercial intent: '74% of consumers reported a lack of transparency about the paid promotions of products by social media influencers' (European Commission 2024a:170, 130). The report adds:

> In the consumer survey for this Fitness Check, 45% consumers noticed that the content they were viewing seemed to be a paid promotion or advertisement, but the website or app did not make this clear. This was particularly high amongst those in the younger age groups (28% of 18-25 year-olds, and 29% of 26-35 year-olds, compared to 11% of 55-64 year olds, and 10% of those aged 65+).

The European Commission Fitness check on consumer protection acknowledges that disclosure requirements impose comparatively low costs for compliance, stating (European Commission 2024a: 66) For example, there is a major difference between the costs faced by a social media influencer that simply needs to add an advertising disclosure (e.g. hashtag) in a sponsored post and refrain from unfair advertising practices, in comparison to the costs of operating an e-commerce webshop that entails processing the returns of physical

goods. The second problem concerns the consequences of brand voice/influence on editorial (independence) and aesthetic (autonomy) qualities in public media. This is strongly articulated in some 20th century regulations but is arguably weakening and becoming 'residual' in contemporary governance. For example, in the professional standards and self-regulation of journalism in the United States, US the principle of separation between editorial and advertising was articulated in terms of the protection of media integrity but has been weakening since the 1970s (Hardy 2010, 2022, 2023a). Currently the main regulation of branded content is that of the Federal Trade Commission (2015a,2015b) whose remit and focus is on consumer protection rather than on the impact and implications of branded content for media quality, independence and integrity (Hardy 2022: 152).

In our report, *Branded Content Governance: 32-country comparative analysis*, we discuss the shifts in the International Chamber of Commerce code. The ICC has clear rules on the identification of advertisements, first introduced in the 1966 edition of the Advertising Code which stated that 'advertisements should be clearly distinguishable as such, whatever their form and whatever the medium used' (ICC 1966: 8). This continued: 'when published in a medium also containing news and editorial opinion, an advertisement should be so presented that the consumer can readily distinguish it from editorial matter'.

The most recent version of the ICC Code in 2024 (ICC 2024) restates the principles of identification and transparency in Article 7 but now adds:

> In the case of mixed content, such as with news or editorial matter or social media, the marketing communication element should be made clearly distinguishable as such, and its commercial nature should be transparent. It should be so presented that it is readily and immediately recognisable as a marketing communication and where appropriate, labelled as such.

The ICC seeks to uphold the principles of identification but in a context that acknowledges the varieties of integrated media and marketing communications. The rules do strive to uphold the identification principle introduced into the 1966 Code, but the language reveals the challenges: what must be made 'clearly distinguishable' is no longer an advertisement but something inherently less distinct, a 'marketing communication element'. The tension, and contradiction, is that what is 'mixed' must also accord with a longstanding principle of being unmixed, separated: a tension 'resolved' by the requirement to distinguish the 'marketing communication element' within the mixed content. Above all, the protection of 'editorial matter', and of editorial integrity, is retained, but in weakened form.

There are concerns beyond the erosion of qualities of editorial and aesthetic integrity, which concern share of voice. The third problem, marketers' power and share of voice, summarises more radical critiques that demand systemic reforms to set limits on how and where marketers' can pay for presence. Marketers have a power not granted to any other section of society. They can pay for presence in communications to reach out to readers and viewers. Payment buys voice and with voice comes the capacity to influence. Historically, there have been limits placed on the exercising of this power; societies set limits on the freedom to advertise. As well as regulation, media-marketing industry arrangements, technological conditions, and professional values have all contributed to setting limits on how, where, and to what extent marketing communications can appear in communication spaces and ad-carrying vehicles. The conditions that have given rise to increasing branded content have been alterations to conditions that together restricted brand voice and influence. The power to pay for presence has extended beyond designated advertising and commercial space. In doing so, it threatens to undermine the expectations of editorial and aesthetic independence created through institutional values, practices, and reader expectations, as problem area two addresses. Those expectations may be characterised as archaic associations for declining media, such as newspapers, except that they exist across 'new' media, too, for instance in the criticism and concerns about authenticity and disclosure of paid posts in influencer communications, sponsored podcasts, AI assistants and other emergent forms.

These three problem areas share a focus on the implications of communications environments on consumers, media and society (Hardy 2022: 206-228) but, the BCGP has added a fourth to add focus on the capacity of those involved in evolving forms of promotional cultural production to exercise good governance. This seeks to address issues of power, precarity, training, support and more that affect practitioner-creator capacities to influence ethical outcomes. The media-marketing sector is an ever-expanding, dynamic and unstable ecology whose features we examine in our *Media-Marketing Ecology study* (Hardy et al 2024, and forthcoming). We also examine the experience and attitudes of UK and Spanish practitioners in our *Governance-in-Practice* report (BCGP forthcoming). An important focus for better governance is on capacity-building for workers across the media-marketing ecology. This includes how best practice and governance compliance is communicated, enacted and supported throughout the institutions, networks, adtec and other automated systems, and supply chains, and through the support and empowering of individuals.

The rapidly evolving and re-forming natures of promotional communications institutions (MacRury 2017), many of which have become disrupted—not least through technology (MacRury 2025a), but also through hybrid working and new professional alignments can squeeze organic learning out of creative workflows (MacRury

2020). New professional alignments (and understandings) for example, between computer science and creative advertising (MacRury 2025b) production or between journalism and promotional media content creation can unsettle working assumptions norms and good governance.

At the same time, there is the growing array of 'disorganised', freelance and project-based creative workers (MacRury 2018) whose original professional training and concomitant identity/identification with professional values and standards may encompass only a small part of the necessary overview and consideration required to operate thoughtfully and in a spirit of creative compliance in roles and tasks emerging from different parts of the media ecosystem, but where they may be engaged.

Branded content creators are notable here (MacRury 2018) for example; a journalist deployed in writing promotional content or a marketing trained- production assistant sourcing goods for a brand-commissioned entertainment show. Disrupted environments - brand studios, or 'labs' - work best when they are also able to be learning environments. Our work, then, suggests an emergent appetite and heightened need for appropriate and distributed forms of CPD in this space.

Table 1: Branded content problems in governance discours

Consumer Awareness Labelling, identification	Dominant
Integrity of media channels Editorial, creative independence	Residual
Marketers 'share of voice' Marketers' influence on content and range of information, imagery and ideas circulating.	External; Emergent?
Diminished governance agency capacity for cultural workers	Emergent?

3.2 Problems and Mitigations Tables

Table 2: Theory of Change Mapping

Branded Content Governance Project
Theory of Change Mapping

Stakeholders (policy actors and publics)

• Industry trade bodies (inc. industry reg orgs, IROs); leaders/firms/senior practitioners; non-senior Industry practitioners across marketers/agencies/media/creators/platforms/adtech.
• Key policy actors: politicians; governmental; statutory regulators; self-regulatory organisations, SROs; legal practitioners.
• Civil Society: media and marketing trade unions; communications reform organisations; data/coms ethics organisations.

Problems	Causes	Activity and output
1. Consumer identification of marketing communications (and awareness of commercial intent). 2. Detriment to media quality and integrity: editorial and aesthetic. 3. Marketers' power and ability to dominate communications. 4. Diminished capacity of creative workers to act ethically and in accordance with 'good governance': precarity, perceived lack of agency, confidence, training and support.	1. Economic incentives for key actors across sextet (marketers, agencies, media, creators, platforms, adtech). 2. Regulatory deconvergence: enforcement gaps/anomalies/neglect 3. Uneven policy access and influence. 4. Low user/civil society awareness/action. 5. Precarity in media-marketing industries.	• 32-country comparative analysis of regulation. • Industry analysis (media-marketing ecology mapping). • Policy recommendations and stakeholder discussion. • Industry/adtech proposals for better practices. • Academic outputs/media outputs. • Media education/literacy resources and networking • Guides on ethics/governance 'good practice'.

Assumptions

1. Framework (risks) assumption that greater awareness leads to improved governance/self-governance but this downplays the institutionalised arrangements, and economic and other incentives, that support a lack of adherence to standards for identification, form and placement of branded content (political economy and policy analysis).
2. May underestimate means to marginalise BC policy arguments and initiatives; current lack of influence of BCGP and limited capacity for influence (inc. demonstrating sufficient evidence of harm).

- Education: HEI academics; PG/PGR, UG. Media literacy (linking to civil society).
- Funders: ESRC, AHRC; prospective funders.
- Media: general, trade (professional), civil; social commnuications and networks.

Outcomes (changes)

1. Detrimental effect of economic incentives mitigated by better regulation/ governance.
2. Commitments for better governance standards across industry/policy stakeholders.
3. Higher profile for branded content as policy issues.
4. Support/use of media education initiatives.
5. Support mechanisms for practitioners (e.g.training and guidance).

Impact

1. Ad transparency: a) Clearer labelling/ identification b) Better awareness; tools for users c) regulatory monitoring/ enforcement.
2. Supported standards for protection/promotion of media integrity
3. Restrictions on advertising including a) source/paid identification; b) separation of advertising-media; c) action to remove deception and disinformation in ad formats/ placement.
4. Professional (and pro-am) capacity-building. Increased knowledge, support, agency.

3. Assumes BC is and will remain a salient way to organise/ understand the industrial-policy area examined and set out proposals for action.
4. Assumes levels of good will/good faith to collaborate and engage in discussion on problems/solutions amongst project participants and wider relevant parties and stakeholders.

Table 3: Domains and Stages (1) Scope and Activities Description

Branded Content Practices, Problems, Mitigations
Domains and Stages (1) Scope and Activities Description

Practices/production

SYSTEM	STRATEGIC	OPERATIONAL
Adtech/Media-marketing Ecosystem, Infrastructure, Embedded decisions, institutions, cultures; codes, algorithms, AI/automation	**Corporate decision-making/allocative control (Commercial; PSM; Alt.)**	**All actors/processes involved in 'realised' content production**
Political economic	Firms/org's executive.	Content production operations/ processes (informed by strategic, and other stages/ domains)
Business/market	Strategic decision-making (in system-societal contexts)	
Legal-regulatory		
Media systems/cultures		
Transnational/ transcultural		

Governance

SYSTEM	STRATEGIC	OPERATIONAL
Macro-governance arrangements; industry– reg/ self-reg arrangements (macro level gov.)	Corporate (and trade body) lobbying, policy influence, positioning of firms/ industry interests; industry – self-reg interactions (macro gov)	Practitioner ethics, meso/micro governance
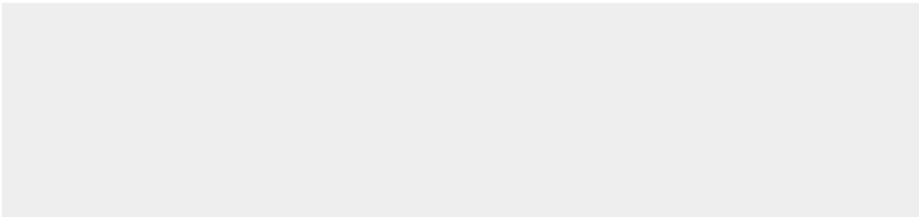
DISSEMINATION

Content presentation / realisation; circulation, recirculation; reception, use, (co)creation'; User/ market actions (e.g adblocking)

Movement of content/ interaction with content/ experience

Responsive to operational (influenced by range system-societal)

Individual/aggregated user market activity

SOCIETAL

Consumer-civil action; civil society; democratic processes

Knowledge and belief systems (persuasion knowledge; attitudes to media-marketing integration; sponsor influence)

Public media discourses

DISSEMINATION

Consumer action (indiv. complaints)

Discussion:interpersonal/ intergroup/public media/ mediated; (micro gov)

SOCIETAL

Civil society organisation; policy actors/stakeholders (macro/ meso/micro gov.)

Table 4: Domains and Stages (2) Problems and Mitigations for industry practices

Branded Content Practices, Problems, Mitigations
Domains and Stages (2) Problems and Mitigations for industry practices

Problems – Industry Practices
P1: Consumer awareness P2 Media quality
P3 Marketer's power P4 Diminished Capacity

SYSTEM	STRATEGIC	OPERATIONAL
Adtech/M&A Ecosystem, Infrastructure, Embedded decisions, institutions, cultures.	**Corporate decision-making/ allocative control** (Commercial; PSM; Alt.)	**All actors/processes involved in 'realised' content production**
(Economic incentives for key actors across sextet) Adtech system	P1, P2, P3, P4 Inconsistent commitment to transparency/ disclosure	Conflicting pressures, antimonies, hierarchical control. Poor governance adherence cultures
Surveillance advertising Disinformation drivers	Marketers' power	Cultural production capacity diminished for professionals/ creators (precarity, perceived lack of agency, confidence, support)
State-market; capitalisms		

Mitigations

SYSTEM	STRATEGIC	OPERATIONAL
Adtech/plaform gov	Strengthened industry codes (& monitoring, accountability)	As strategic but also informal (self) gov mechanisms; training and education; (whistleblowing). Professional capacity-building. Increased confidence, support, agency
Public accountability, transparency	Positive kitemarking	
	Integrated polycentric governance: strengthened SRO, statutory reg/legal	

DISSEMINATION

Content presentation / realisation; Circulation, recirculation; reception, use, (co)creation

Poor/inconsistent labelling and identification

SOCIETAL

Consumer-civil action; civil society; democratic

Low user/civil society awareness/action (reducing pressure on governance)

Deterioration of trust in news brands/ advertising/ communication services

DISSEMINATION

Standardised labelling/ disclosure;

Media education initiatives

SOCIETAL

Public education

Public media

Table 5: Domains and Stages (3) Problems and Mitigations for policy/governance

Branded Content Practices, Problems, Mitigations
Domains and Stages (3) Problems and Mitigations for policy/governance processes

Governance – Problems (focus on problems as expressed through policy process/arrangements)

SYSTEM	STRATEGIC	OPERATIONAL
Adtech/M&A Ecosystem, Infrastructure, Embedded decisions, institutions, cultures.	**Corporate decision-making/ allocative control** (Commercial; PSM; Alt.)	**All actors/processes involved in 'realised' content production**
Outdated arrangements, values	Powerful industry lobbies and access	Standards/guidance from strategic to operational
(Regulatory gaps/neglect)	Policy risk management strategies	Lack prof training/educ.
Gov- Industry (and SRO) relationships; 'closed' policy-making		Lack of self-reflection/gov mechanisms (prof. media discussion etc.)

Governance - Mitigations (various identified, including research contribution at each 'stage')

SYSTEM	STRATEGIC	OPERATIONAL
Comprehensive/converged governance; integrated polycentric governance	Monitoring/accountability measures (inc. lobbying controls and transparency)	Practice-problem research to inform policymaking
Widened participation at all stages of policy/reg oversight	Research to influence policy actors; stakeholder engagement (employers)	Industry stakeholder engagement (practitioner/ employees/ creators)
Comparative research informing policymaking		

DISSEMINATION

Content presentation / realisation; Circulation, recirculation; reception, use, (co)creation

Inaccessible consumer complaints mechanisms

SOCIETAL

Consumer-civil action; civil society; democratic

(Low policy awareness)

Lack of mechanisms for public participation in policy process; lack of policy stakeholders (intermediaries for public to key policy actors/reg.)

'Lack' of research indicating harm/justification for strengthened regulation

DISSEMINATION

Embedded tools for dislosure/ awareness/ reporting by users.

User opinion/participation mechanisms (research)

SOCIETAL

Democratic policymaking; access and deliberation

Research to inform policymaking, civil society and academic capacity-building

Table 6: Governance issues across upstream/midstream/downstream

GOVE[RNANCE]

"UPSTREAM", "M[IDSTREAM]", "DOWNSTREAM"

UPST[REAM]

| Standardised identification for all marketing content | Common identification standards | Mandatory disclosure of material connections, incl gifts | Rules/ principles for separating/ demarcating advertising and non-advertising content | Lobbying controls and transparency measures |

MIDST[REAM]

| Enhanced monitoring e.g. to support enforcement/complaince - including of and by AI | Pre-clearance/ advisory facilities in broadcast and non-broadcast workflows | Research to influence policy actors incl. AI, misinformation, promotional media, & practitioner-policy links | Comparative research informing policymaking | User participation mechanisms - audience-in-governance | Sta[...] "p[...] |

DOWNS[TREAM]

| Fines and penalties for non-compliance | Remedial actions for regulatory breaches | Accessible/ intellig[...] citizen complaints [...] |

MIDSTREAM" AND
" INTERVENTIONS

REAM

Democratic policymaking as
redress/response

Comparative research informing
policymaking

Mandates toward Public education/various
kinds of media literacy intervention
regarding/ including branded content

Mandates towards Professional
capacity building / Professional
standards

Instituted statutory and self-
regulatory bodies/ trade bodies

TREAM

akeholder engagement /
olycentric" connectivity

Support for civil society/NGO
links

Whistleblowing mechanisms e.g.
protecting freelancers/production
staff

Continuous professional
development for communications/
marketing practitioners/"creators"

Real-time data sharing and
(interpretive) reporting on grey
areas / infringements

Periodic policy reviews/reflection

STREAM

ible consumer/
mechanisms

Post-incident(s) analysis and
learning - new cycles of policy
initiated

Media literacy mobilised by
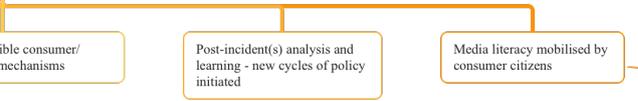consumer citizens

3.3 Problems in branded content governance

How branded content has developing in different national and regional contexts is influenced by formal laws and regulations, corporate decision-making, civil society advocacy, and by the cultures and practices of media and marketing practitioners and users alike.

There are three main types of advertising regulation: statutory regulation, derived from legislation; self-regulation by industry (with varying degrees of non-industry oversight); and a blend of both (co-regulation). In most countries, advertising is regulated by a mixture of legislation and self-regulatory codes of practice (Ikonen et al. 2017).

The governance of the interface of marketing and media communications continues to be shaped by the ways these types of communication have been treated over long histories and how governance arrangements have informed and co-developed with industries, institutions (including governmental, regulatory, legal, industrial and civil society), practices and professional (and non-professional) identities, and discourses (values, attitudes, etc).

Media has historically had divergent treatment between a voluntary (self-regulatory) 'free press' model (no prior governmental control over content) and a statutory model (governmental agency or statutory regulator) for broadcasting (radio and television). Advertising has tended to be regulated along self-regulatory lines (similar to and sometimes sharing 'free press' arguments – 'right to advertise) but with advertising affected by a range of legal and regulatory measures affecting what can be marketed, how, where, when and to whom.

The BCGP argues that, overall, the governance architecture needs to be overhauled. There are gaps and anomalies in governance. Regulatory convergence has been partial and incomplete. The present phase, can be characterised as 'deconvergence'.

Deconvergence

A process of regulatory convergence to match communications convergence has been underway for more than half a century, at national and supranational levels. Yet, this process is underdeveloped when it comes to issues at the interface of media and marketing communications. Both national media systems and supranational regulatory arrangements, such as the EU, show the following features:

1. The persistence of arrangements for legacy media that do not adequately map practices across those media in their contemporary (converged, cross-platform, innovative format) forms
2. Extensions of rules to 'new' digital media that can lack scope and reach, clarity in application and enforcement
3. For both legacy and 'new' communications relative lack of attention to marketing communications issues in legislation and policymaking compared to information, news, entertainment, social media and in 'online harms' agendas.

The explanations for why include:

1. The continuing influence of historical arrangements
2. The 'relative' neglect of media-advertising governance issues (partly arising from 1 but also other factors)
3. The relative strength of arguments and interests that favour the retention of current arrangements against those for change and reform
4. 'Opportunistic deconvergence' - the influence of interests that seek to maintain or promote governance that is/remains de-limited in scope by application to specific media forms or practices.
5. Regulatory risk management – this is an essential and ongoing activity for those whose activities are affected by regulatory action. Our analysis focuses on the specific forms this can take by actors, particularly those businesses or enterprises that are affected by governance of media-marketing.
6. Corporate lobbying power
7. Disincentives for expenditure of 'political (governance) capital' by politicians.

All these tendencies can generate gaps, omissions, anomalies in formal governance. These tendencies can also be mutually reinforcing, exacerbating problems of 'deconvergence'. They can also influence and be manifested in the examples of 'compartmentalisation' we examine in *Branded Content Governance: 32-country comparative analysis*. In that report, we give the example of EU disinformation policy which initially set out a broad mapping of the problem that included brand sponsored content. However, the EU supported an industry-led Code that removed 'misleading advertising' from the scope of disinformation as a policy issue. The full analysis of the influence and effectiveness of corporate lobbying by key actors in the media-marketing ecology is a task for future research. However, we can identify compartmentalisation as part of a strategy of regulatory risk management. The growing regulatory attention to 'disinformation' and the inclusion of sponsored content and native advertising posed a risk to market actors and intermediaries. The removal of 'misleading advertising' from scope, significantly reduced that risk through policy compartmentalisation.

Reach of Regulation

The contemporary media-marketing ecology involves a much greater and more diverse range of actors than were involved in the period of professional mass media (from early 20th century to 1980s) when some of the key institutional arrangements for advertising governance were first formed. We examine this as a shift from a triad of institutionally interlinked professionals (marketers, marketing agencies and media) to a sextet, with a greater range of actors some of whom, across the pro-am spectrum, are less embedded in, and less supported by, inter- and intra-institutional and professional system. The self-regulation of advertising has been

based upon formal and informal mechanisms to encourage and uphold compliance amongst closely interacting market actors. Those conditions have come under increasing strain with the expansion of transnational digital media platforms and services, the adtec system, automation and socio-technological innovation in marketing tools, the challenges for marketing agencies and transformations in marketing service provision, all of which have increased marketing opportunities and access for marketers. We examine these changes in our report *Mapping the Media-Marketing Ecology (Hardy et al 2024 and forthcoming, as an open access publication for Routledge)*. These changes have also influenced policy deliberation on whether existing governance arrangements need to be revised and updated. The BCGP has examined such policy debate in the UK including the Online Advertising Programme consultation (Hardy et al 2023, Hardy 2024). The ability of all existing governance systems to reach across all relevant activities and actors is under question and scrutiny. The problems are arguably most acute for voluntary, self-regulatory arrangements, although these systems have also worked to bring new actors into the system as marketing expands, from digital marketers, for those operating in the 1990s, to influencer marketers today.

Compliance

A discourse of 'responsible' versus 'rogue' marketers is evident in the arguments of those seeking to retain the primary role for advertising self-regulation in the UK (Hardy et al 2023, 2024) and in wider policy discourse. This seeks to distinguish, and delimit, the case for stronger regulatory action to specific non-legal activities carried out by rogue actors, while arguing that the vast majority of 'responsible' marketers support and comply with voluntary self-regulation. However, examining compliance for issues in branded content complicates and challenges this account. It is significant, but not unique to branded content, that compliance involves obligations across the value chain of marketing, from platforms and publishers, to marketing agencies and other intermediary service providers including relevant adtech systems, as well as the client/sponsoring brands or other marketers, and the creators or others involved in the production, circulation of marketing communications. Also, undeveloped in governance systems, are the compliance responsibilities for users including those pro-sumers involved in the recirculation or repurposing of the communications. The BCGP has only conducted its own limited studies of compliance but these show that compliance problems occur across major players in the 'responsible' SRO system not just rogue actors. We show how brand sponsored content is poorly labelled and disclosed by major UK publishers (Hardy et al 2023). We also draw on extensive third-party research on compliance, such as the study by Annabell, Aade and Goanta (2024) on platform compliance discussed above, and others cited in our country reports, including Goanta (2020). Important questions about the levels of compliance in specific industry sectors and contexts lie beyond our study, but there is sufficient evidence that compliance problems occur across the spectrum of actors and that governance responsibilities need to be applied across the media-marketing ecology sextet. In its 2021 report on Instagram influencers,

the UK self-regulator for advertising, the Advertising Standards Authority (ASA 2021) found 'a disappointing overall rate of compliance with the rules on making it sufficiently clear when they were being paid to promote a product or service'. A 2024 European Commission study found that the number of influencers who disclose commercial content as advertising is very low, at 20%, despite 97% engaging in promotional activities (European Commission 2024b).

Such observations have some knock-on implications at the level of practice and in the institutions/organisations that have traditionally 'held' different elements and responsibilities in the work of governing advertising and promotional communications. Influencers are often the most obvious 'outliers' in respecting the working assumptions guiding more established communications forms/practitioners (MacRury 2020). One of the major areas where we think there is continued space, demand, and indeed need for ongoing forms of support is in respect of accessible professional development and training. In what will continue to be a fast-moving and rapidly changing governance environment, people are a key vector for practical governance. They need space to learn.

Weak enforcement

There are problems of enforcement across all forms of governance. Some general reasons for this include the lack of definition, specificity and prioritisation for branded content issues. Some issues have gained significant policy attention leading to regulatory action and enforcement, notably social media influencer marketing. For other issues, including native advertising and sponsored content in publishing the wave of regulatory attention of the mid 2010s has tended to recede. Branded content issues are present but relatively subsidiary and displaced in dominant policy discussion on issues such as artificial intelligence, 'online harms' and platform governance. Enforcement problems also include lack of capacity, legal uncertainty (where regulatory action may be challenged or tested in court action) and lack of established processes. Problems of enforcement are not limited to self-regulatory Organisations, some of whom, like the ASA, have developed AI tools for very extensive, proactive monitoring to underpin enforcement. However, most SROs lack ready access to legal enforcement and lack powers to impose fines. SROs also comprise the media-marketing industries they seek to regulate and so their capacity for enforcement action varies.

Definition indeterminacy

Branded content involves the merging and hybridisation of elements that have been treated as separate: 'advertising' and 'media'. As we discuss above, this is not a new phenomena, nor a new issue for governance and critical debate as both have origins in the growth of newspapers and early mass media from the 17th century. However, the hybridisation of media-marketing has expanded in the digital

age, with ever evolving forms and formats. There is a problem of indeterminacy in respect of identifying and regulating branded content. This is present with different, but cumulative, effects across actors in the media-marketing ecology: creators, marketers, marketing agencies, governments, regulators, courts, communication users, complainants.

Low consumer/user awareness

Given the indeterminacy of branded content, including for users and actual/potential complainants (who may be individuals, groups, market competitors or other actor), governance problems are increased by lack of awareness. Research shows a low level of EU consumer awareness of consumer protection (European Commission 2018, 2024). One important aspect is low awareness of SRO complaints mechanisms, which may account for the relatively low number of complaints to the 26 European SROs in the European Advertising Standards Alliance's (EASA 2024) study:

3.4 Summary of governance problems

Table 7: Summary of Governance Problems

Governance	Problems
Deconvergence	Legacy of different rules/treatment of media
	...more fragmentation in treatment of digital media, influencer marketing, streaming services, podcasting etc.
Reach of regulation	Expansion of market actors beyond existing incentives/requirements of self-regulation/ regulation
Compliance	Poor among 'rogue' actors, as above, but also some 'respectable' actors – brands, agencies.
Weak enforcement	Some systems rely on self-regulators who (generally) lack powers to impose fines or take legal action
Definition/indeterminacy	As a hybrid of advertising and entertainment/editorial/'news' content, fused to commercial ends, there is a problem of indeterminacy in respect of identifying and regulating branded content – for creators, regulators, complainants and courts.
Low consumer/user awareness	Low awareness of governance tools and processes available to users

3.5 Towards 'mitigation' of problems and 'solutions'

Four problem areas and mitigations

Problems

1. Consumer/users' lack of awareness of commercial intent
2. Detriment to media quality: editorial and aesthetic independence
3. Marketers' power and share of voice
4. Cultural production capacity diminished for professionals/ creators (precarity, perceived lack of agency, confidence, support)

Mitigations

1. a) Clearer labelling/ identification b) Better awareness; tools for users and reg monitoring/ enforcement
2. Supported standards for media integrity
3. Restrictions on advertising inc. a) source/paid identification; b) separation of advertising-media; c) action to remove deception and disinformation in ad formats/placement
4. Professional capacity- building. Increased confidence, support, agency
5. Better ensuring that media literacy programmes explicitly link alertness to commercial intents as a principle and highlight commercial-branded content communications as a risk/ harm

Comprehensive legal foundation

We recommend that the key principle that all marketing communication should be recognisable as such, which is set out in the voluntary code of the International Chamber of Commerce, should be established clearly in law at national and relevant supranational levels.

As the European Commission concludes in its review of consumer protection (European Commission 2024: 173)' there remains considerable legal uncertainty about the required standard and modalities of ad disclosures'.

A comprehensive legal foundation would set out both a clear principle and enforceable requirement that marketing communications should be clearly distinguishable as such. Achieving that identification through more 'traditional' means of advertising formats and separation of advertising and non-adverting, or through effective labelling and disclosure are matters that need greater consideration, specification and context-sensitive adaption than can be effectively addressed in legislation or in statutory regulation alone. That is one reason why we advocate for an approach that recognises the value of governance agency across the spectrum from statutory to self-regulation and governance-in-practice. This is developed in our proposal for integrated polycentric governance.

Integrated Polycentric governance

The concept of 'polycentric governance' (Cairney et al. 2019; Cairney 2020) describes a system where multiple governing bodies interact and make decisions within a specific policy area or region, with each centre retaining some degree of independence. Polycentricity focuses on the presence of multiple, overlapping centres of decision-making, each with some autonomy. The concept invites consideration of the complex, multi-agency production of governance arrangements and of their interdependencies and interactions, characterised by formal but also more informal engagement. The concept of polycentric governance originates in the description and analysis of complexity in governance systems. This includes finding an optimal balance between state and market centred solutions.

A key argument, and contribution, of the BCGP is to propose a normative model of 'integrated polycentric governance'. This argues that there is value across the range of centres of governance, from the most informal forms of governance-in-practice' to the 'command and control' governance of legal and statutory enforcement, We argue that a key focus for 'better regulation' lies in strengthening 'integration'. This means that there are linkages in the chain that connects aspects of support, oversight and enforcement. 'Stronger' forms of governance are needed to safeguard the application of core standards, but the various forms of self-regulation and voluntarism can be supported to deliver their benefits. Across the various linkages a stronger level of governance is needed 'beneath' to provide a 'backstop' but the 'higher' level can exercise its autonomy and demonstrate its benefits, subject to independent accountability and auditing mechanisms designed to uphold the core governance principles of the system as a whole.

The proposal for integrated polycentric governance has several aims.

It seeks to move beyond the terms of an argument that has structured discussion of advertising governance, setting 'self-regulation' against 'statutory regulation'

Industry self-regulation of advertising developed as an effort to prevent or at least delimit statutory regulation and the 'case for self-regulation' has been a core task for SROs and the business groups involved ever since. Yet, the governance of advertising has been polycentric for many decades in most of the countries examined in this report. All systems have a mix of statutory and self-regulation. As the range of marketing activities and marketing actors extends beyond the professional networks who have agreed to be bound by self-regulation, the case for strengthening 'statutory' regulation has grown. The BCGP argues that it would be beneficial, for all stakeholder interests, to move beyond the terms of self-regulation versus statutory and we hope that the concept of 'integrated [polycentric] governance' may help in articulating that new 'regulatory space'. The

BCGP was established to assess how governance is changing for dynamic, adaptive systems such as 'digital communications' and the media-marketing ecology. The evidence examining branded content governance bears out broader studies of 'polycentric governance' to show a dynamic and complex interaction of governance agencies, governance 'tools' and governance effects and outcomes,

It is a false choice to set self-regulation vs statutory as these need to interconnect so that the benefits of both can be strengthened and combined.

It also seeks to reflect insights from the wider conception of governance so that 'support' mechanisms are given due attention as well as 'control' mechanisms.

The BCGP mapping of four key 'problems' in branded content practices includes factors that diminish the capacity of professionals and creators across the media-marketing ecology to act in an informed, ethically-reflexive and suitably autonomous and 'unconstrained' manner. Such capacities may be impacted by precarity in employment/remuneration arrangements, actual/perceived lack of agency, low confidence and capacity due, at least in part, to lack of training and support.

It is a false choice to set 'enforcement' and 'encouragement' against one another as the balancing of both is required for effective governance.

It seeks to provide a flexible framework that supports the case for 'context sensitive' policymaking and policy advocacy.

The evidence of this report shows that action to 'improve' branded content governance can occur right across the governance spectrum, from supranational laws to industry 'best practice' guidance. The conditions for those actions to lead to meaningful and sustained 'improvements' are themselves complex, ranging from legitimacy and support from those affected, to awareness and education, to accountability and enforcement. The BCGP analysis places emphasis on the need to recognise and investigate the differences across media systems including the influences shaping institutions (section 1). In keeping with that approach it is vital that any proposed governance 'solutions', or mitigations of problems, fit the specific conditions and needs that they are designed to address.

Separation of advertising and media for the 21st century

Identification and disclosure are vital but insufficient. Provisions to alert users to the presence of 'paid' marketing within communications are of the utmost importance but such measures do not require the separation of advertising from 'editorial' or non-advertising content. The four key problem areas identified by the BCGP (section 2.11)

include

1. Consumer/users' lack of awareness of commercial intent.
2. Detriment to media quality: editorial and aesthetic independence.
3. Marketers' power and share of voice.

As discussed in section two, the principle of the identification of advertising was historically aligned with the principle of separation of advertising and non-advertising content. Across different media forms this arose through a different, ever-changing, mix of business, professional, technological, cultural and regulatory influences. With the expansion and intensification of media-marketing integration, especially since the 'digital explosion' of the mid-1990s, the principle of separation has been under ever-increasing strain. On the whole, governance has focused on consumer identification including provision for the labelling and disclosure of commercial content. This has displaced, the second and third problem areas. Drawing on the language of Raymond Williams (1977), concern about the implications of branded content for the quality and integrity of media remains present but in weakened form: it is residual. The system-wide concern that the power of marketers should be subject to limits to protect public communications is 'external'. By this we mean that it is not articulated within the 'regulatory space' (Hancher and Moran 1989) within which core policy actors interact: governmental, regulators and lead industry actors.

We do not offer any overall proposal that would reestablish the principle of separation across contemporary media. Instead, we seek to highlight the need for discussion, to reincorporate 'separation' into stakeholder debate and policymaking. There needs to be wide debate about how the principle of separation can and should apply across 21st century media. In the complex, landscape of what the ICC calls 'mixed content' and with ever-developing forms and formats for branded content, what communication values should be supported and where necessary protected? What are the communication environments that should be kept free from marketing communications?

The BCGP proposal for a comprehensive legal framework is a call for publicly accountable enforcement for converged media. Such a foundation would operate across national jurisdictions but would be subject to inter-national agreement and supranational law where possible to achieve suitable harmonisation. Our proposal for integrated polycentric governance is also a call to shift the discussion from 'self-regulation vs. statutory' towards a greater focus on both the 'benefits' of different governance arrangements, their positive interlinking to extend and maximise those benefits and the need for interlinking as underpinning, to ensure that the disbenefits of any specific governance arrangement is mitigated by others in the integrated system. That is vital to ensure that the limitations of voluntary governance established by industry actors are mitigated by statutory powers to ensure public

welfare and value. However, it is also evident, throughout our study, that flexibility, adaptability, responsiveness, legitimacy and support are also vital. From their embedding in 'governance-in-practice', through to guidance from industry regulatory organisations, self-regulatory organisations, statutory agencies and courts, the governance of branded content illustrates the presence and the need for multiple centres, for multiple modes and types of governance. Our central call is for integrated polycentric governance. We hope that our report and work will stimulate further discussion on what the interlinking of these centres requires so that better governance is nurtured, supported and achieved.

3.6 Upstream, midstream and downstream mapping

Our recommendations fit across upstream, midstream and downstream. While the upstream-downstream framework has great value in identifying different locations for governance it has deficiencies of being linear and stagist. Instead, there is value in recognising also circularity and iteration whereby actions and learning at any point may influence the design and implementation of governance at other points.

When types of breaches/ risks become prevalent, or new risks emerge that could damage the wider functioning of the system, for instance by corroding trust in in tolerable processes of knowledge and authentication in the public sphere, then review become a component in downstream intervention.

Similarly, where business models supporting a healthy-functional media marketing ecology are threatened by diminished trust in, or fragmentation across that 'ecosystem', then it is time to take stock. This means there is a cyclical quality in the process, new rounds of policy formation (upstream) may be initiated in response to emergent problems 'downstream'.

Indeed, one observation is that the up-, mid- and down- demarcations, echoing a kind of "waterfall" or irrigation-type conception of progress/ process fails to acknowledge the turbulent and rapid nature of change in present period, with a cyclical-recurrent 'always in beta' quality to the policy environment as it seeks to grapple with multiple, rapid changes. So, we might say 'agile' polycentric systems are likely best suited to contain and encompass the speed, scope and scale of change.

Our mapping includes the monitoring and enforcement activities of regulators, self-regulators (SROs) and industry regulatory organisations (IROs), especially in midstream activities. We also include our broader attention to policy processes and to the strengthening the influence of societal interests from consumer and civil society organisations to academic researchers.

Table 8: Summary of Governance Problems and Mitigations

Governance	Problems	Mitigations
Deconvergence	Legacy of different rules/ treatment of media	Principles-led/platform neutral, comprehensive law on identification and disclosure of paid-for marketing communications

Integrated polycentric governance: Interlinking governance and support across the spectrum from legal/ governmental bodies to self-regulators, to industry bodies, to more 'informal' governance within organisations/teams/ networked practitioners

Clearer labelling/ identification

Media-marketing governance to include source/paid sponsor identification
b) attention to appropriate separation of advertising-media;
c) action to remove deception and disinformation in ad formats/ placement. Better awareness; tools for users linked to monitoring/ enforcement.

Support for standards for media integrity.

Professional capacity- building to Increase confidence, support, agency for pro-am actors across the media-marketing ecology |
	...more fragmentation in treatment of digital media, influencer marketing, streaming services, podcasting etc.	
Reach of regulation	Expansion of market actors beyond existing incentives/ requirements of self-regulation/ regulation	
Compliance	Poor among 'rogue' actors, as above, but also some 'respectable' actors – brands, agencies.	
Weak enforcement	Some systems rely on self-regulators who (generally) lack powers to impose fines or take legal action	
Definition/indeterminacy	As a hybrid of advertising and entertainment/editorial/'news' content, fused to commercial ends, there is a problem of indeterminacy in respect of identifying and regulating branded content – for creators, regulators and complainants and courts.	
Low consumer/ user awareness	Low awareness of governance tools and processes available to users	

3.7 Future research, deliberation and networking

Proposed changes in all governance, but 'formal' regulation in particular, should be supported by research. It is important that impact studies are conducted and that, once implemented, changes are subject to monitoring and review. Mechanisms for publicly accountable, periodic review by regulatory organisations themselves or independent review are also necessary. However, the call for policymaking to be evidence-based needs to be accompanied by a fair assessment of capabilities and efforts to mitigate conditions that can concentrate such resources within the industries, and supporting interests, that are subject to regulation. The access of media-marketing groups to industry research data and capacity, advocacy expertise, political capital and access (for the large platforms in particular) makes for an inherently uneven playing field across the research-policy nexus. This highlights the important role independent academic researchers can play through their own research and in support and dialogue with industry and civil society actors and stakeholders. The BCGP is especially grateful for public research funding for our work, from UK Research and Innovation, and recognises the responsibility to assist in building up independent, academic research capacity. This capacity can provide an intellectual and inter-institutional foundation to support this growing, multi-disciplinary field of promotional industries studies.

The Branded Content Research Network brings together international researchers interested in all aspects of branded content and media-marketing integration. The BCRN also welcomes interested participants from industry and policy actors and stakeholders and promotes dialogue and exchange to support research and education across these domains. As the Branded Content Governance Project completes its funded work in 2025, we invite all those interested in our work to join the mailing list for the Branded Content Research Network. To do so, or for any other enquiries, please email bcgproject@arts.ac.uk.

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For a more extensive bibliography, see the BCGP report *Branded Content Governance: 32-country comparative analysis*, available at https://figshare.arts.ac.uk/BCG_Project

About the Branded Content Governance Project

As media and marketing merge and new forms of marketing communications proliferate, are regulatios, guidance and best practice keeping pace? That is the focus of our three-year international nresearch project, the Branded Content Governance (BCG) Project. The BCG Project examines the regulation and broader governance of content that is funded or produced by advertisers. Our project is oriented to consider 'problems' and challenges (e.g. how are evolving forms of branded content addressed in relation to identification and disclosure? What values guide governance and are these suitable? How should the effectiveness of governance structures and processes be measured and assessed?). The central aim is to provide research-led insights and recommendations for managing and regulating branded content and communications in the digital age. The project is funded by two UK Research Councils at Research and Innovation UK (ESRC and AHRC; ES/W007991/1).

We have published various reports and interim versions of project outputs and will be publishing final versions of all reports by November 2025 when the current phase of UKRI funding ends. These include our 32 individual country reports and an accompanying report Branded Content Governance: 32-country comparative analysis. We have published in 2024 an interim version of a report that will be published in final, expanded form, as an open publication by Routledge, Mapping the Media-Marketing Ecology. Our other outputs include three research reports that build on our comparative studies in the UK and Spain. These are Governance-in-practice, an analysis of practitioners' views on branded content practices, ethics and governance; Media Analysis, a study of the reporting and discussion of branded content governance issues in professional ('trade') and public news media; Policy Analysis, a study of branded content regulation, policy actors and processes in the UK and Spain. We publish a project newsletter and other outputs from talks and events. All publications can be accessed at *https://figshare.arts.ac.uk/BCG_Project.*

About the Branded Content Research Network

The Branded Content Research Network is an international network that brings together academic researchers, industry and civil society interests to explore the practices, arrangements, governance and implications of branded content, native advertising and the convergence of media and marketing communications. The network aims to promote research, collaboration, and dialogue across diverse perspectives

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