

SOCIAL SECURITY FOR CONTENT CREATORS AND INFLUENCERS (INPS CIRCULAR NO. 44/2025)



JULY 2025

On 19 February 2025, INPS published Circular No. 44, which provides clarification on the subject of the Pension Fund for Entertainment Workers (FPLS) and the activities carried out by content creators, bloggers and influencers in the field of digital marketing.

MAIN CHANGES

1. Advertising and artistic performance

INPS recognises that promotional content created by content creators can be considered as actual artistic performances, similar to those of traditional commercials. In such cases, the obligation to contribute to the FPLS applies.

2. When the FPLS regime applies

There are two cumulative conditions required:

- remunerated activity (cash compensation or other benefits);
- activity attributable to those listed in Article 3 of Legislative Decree C.P.S. 708/1947, as updated (actors, models, performers, etc.), which therefore have artistic/creative performance as their content.



If both conditions are met, the client (agency or brand) is required to pay FPLS contributions, regardless of the type of contract used.

3. Excluded activities

The following are excluded from the contribution obligation:

- activities involving mere sponsorship or endorsement (e.g. simple use of products and association of the product with the influencer's image);

OPERATIONAL IMPLICATIONS FOR COMPANIES

To limit the risk of classification as an artistic activity:

- avoid providing creative briefs;
- do not provide for professional filming or direction;
- limit requests for rework to legal or regulatory reasons.

NEXT STEPS

We invite brands and agencies to:

- carefully verify the nature of their collaborations with creators;
- consider the amounts contributed by the client when quantifying budgets dedicated to influencer marketing activities;
- define clear internal policies consistent with INPS criteria in order to prevent errors in the event of turnover in the functions that manage the activities in question;
- specify in contracts how the relationship between the parties will be regulated with regard to the payment of contributions, defining the relevant responsibilities.

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