



THE SIGNAL PAPERS

Essays on the Creator Governance Gap

No. 4

The Risks In Your Creator Programme Are Probably Already Visible.

Creator Governance Does Not Create Risk. It Makes Existing Risk Visible.

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Ask a Chief Risk Officer whether their organisation maintains a risk register and they will describe it in detail.

Ask a Head of Influencer Marketing the same question and they may not know as much about it.

The interesting thing is that both departments are often dealing with exactly the same concept.

Risk professionals use a simple tool called a risk register. At its most basic level, it is a documented list of things that could go wrong, the likelihood of them occurring, the potential impact if they do and, crucially, the controls in place to manage them.

Every creator programme already has one. The difference is that it often remains undocumented until something goes wrong.

Consider a typical creator portfolio.

Perhaps there are hundreds of creators spread across multiple markets and platforms. Some may have been onboarded recently, others may have worked with the organisation for years. New creators are added, existing creators leave and audience behaviour changes constantly.

Most organisations view this through a marketing lens.

How many creators?

What reach, what engagement?

What return on investment?

These are important questions, but they should not be the only questions.

Because hidden inside almost every creator programme is a collection of risks that exist whether the organisation has chosen to acknowledge them or not.

There may be regulatory risk if creators fail to comply with disclosure requirements.

There may be conduct risk if a creator becomes involved in behaviour that conflicts with brand values.

There may be dependency risk if a significant proportion of campaign performance relies on a small number of individuals.

There may be concentration risk if too much exposure sits within a single category, platform or audience segment.

There may be monitoring risk if creators are assessed once and then left largely unsupervised as their content, behaviour and interests evolve over time.

There may be record-keeping risk if creator records are incomplete, inaccurate or outdated, making it difficult for the organisation to demonstrate that appropriate oversight has taken place.

None of these risks are theoretical and none of them are new.

They already exist.

The organisation may not have documented them. It may not have quantified them. It may not have assigned ownership or established controls. But the risks remain regardless.

This is where many discussions about creator governance become unnecessarily complicated.

Many people hear the word governance and immediately think about additional processes, additional approvals and additional bureaucracy.

In reality, governance begins with something much simpler.

Visibility.

The objective is not to eliminate risk.

No organisation can do that.

The objective is to understand where risk exists, how significant it may be and whether appropriate controls are in place.

That is not a creator marketing concept.

It is simply good business practice.

Most organisations already apply this thinking to suppliers, cybersecurity, privacy, health and safety, finance and countless other functions.

Should creator programmes be different?

The ownership challenge becomes most visible when something goes wrong.

Marketing selected the creator.

Legal approved the contract.

Communications handled the fallout.

Compliance interpreted the regulations.

The agency managed the relationship.

Each function owned part of the process.

Partial responsibility is distributed. Overall ownership is absent.

That is not a creator problem.

It is a governance problem.

The creator economy has matured, budgets have increased and regulatory scrutiny has expanded. Creator partnerships have become strategically important to some of the world's largest organisations, yet many businesses still struggle to answer a surprisingly simple question.

What are the risks within our creator portfolio?

The answer is usually there.

The signals are often visible.

The challenge is recognising them.

Creator governance does not create risk.

It makes existing risk visible.

Someone needs to own the process.

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