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THE SIGNAL PAPERS

Essays on the Creator Governance Gap

No. 10

The Creator Governance Operating Model

From Creator Marketing To Creator Governance.

Creator Governance is not a checklist. It is the system that makes creator decisions visible, defensible and repeatable.

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Most organisations no longer need to be told that creators can create risk.

They have seen the headlines. They have seen partnerships questioned, posts resurfaced, old content re-examined, audience reactions change, regulators intervene, competitors appear, creator-owned businesses attract criticism, and brand teams forced to explain why a creator relationship existed in the first place.

The problem is no longer awareness.

The problem is operating discipline.

Creator marketing has become a substantial business activity. It carries brand trust, product claims, audience access, commercial spend, regulatory sensitivity and reputational consequence. It often operates across agencies, markets, brands, platforms, campaigns and creator relationships that change over time.

But the governance around it has not always kept pace.

Many organisations have campaign processes. They have shortlists, briefs, contracts, content approvals, reporting dashboards and agency workflows. They have influencer marketing platforms. They have brand safety checks. They may have legal clauses, morality provisions and disclosure guidance.

Those things matter.

They are not the same as a Creator Governance Operating Model.

An operating model is what turns creator risk from scattered judgement into organisational capability. It defines how creators are assessed, how decisions are recorded, how change is monitored, how Amber findings are reviewed, how escalation works, and how learning travels across the organisation.

It allows local teams to move quickly without forcing every decision to start from zero.

It gives senior leaders confidence that creator relationships are not merely being activated, but governed.

The future of creator marketing is not less creativity.

It is better governance around the risk.

The Question Is Now Practical

The earlier papers in this series argued that creator marketing has a due diligence gap.

They argued that organisations often apply more scrutiny to suppliers than to creators representing their brand to millions of consumers. They argued that creator approval needs to be defensible, not merely convenient. They argued that creator suitability changes over time, that monitoring is a process, that Amber decisions require ownership, and that local knowledge has to become organisational memory.

Those arguments lead to a practical question.

What should Creator Governance look like in practice?

The answer cannot be a single check at the start of a campaign. It cannot be a one-off brand safety score. It cannot be a platform profile, a spreadsheet note, a clause in a contract or an informal view held by an agency partner. It cannot depend on whether one person happens to remember that a creator was flagged before.

Creator Governance needs a system.

That system must not make every campaign slow. It does not need to make every creator decision a committee decision. It does not need to put legal, compliance and communications inside every piece of influencer activity.

But it does need to separate normal campaign execution from the governance decisions that require evidence, ownership and review.

Most creator activity should still move efficiently. Teams should still be able to brief creators, build campaigns, respond to cultural moments and work with talent in a way that feels alive. Creator marketing loses something if it becomes so controlled that it stops being creative.

The point of Creator Governance is not to remove judgement.

The point is to make judgement visible, structured and defensible.

Defining The Creator Governance Operating Model

A Creator Governance Operating Model is the set of standards, records, responsibilities and escalation routes that determines how an organisation assesses, approves, monitors, reviews and learns from creator relationships.

It answers the questions that campaign processes often leave unresolved.

> *Who is in the creator portfolio?*
> *Has the creator been assessed?*
> *What was found?*
> *Was the creator approved, rejected, paused or approved with conditions?*
> *Who made the decision?*
> *When was it made?*
> *When does the decision need to be reviewed?*
> *What happens if the creator changes?*
> *Who owns the Amber Call?*
> *Who has the authority to pause activity, and under what conditions?*
> *Where does the record live?*
> *How does learning from one team become visible to another?*

That is the practical work of Creator Governance.

It turns creator suitability from a moment of opinion into a managed organisational record. It gives marketing teams a framework to work within. It gives legal, compliance and communications a route into the process before something goes wrong. It gives agencies clearer standards. It gives senior leaders visibility of where creator risk sits across the portfolio.

Most importantly, it gives the organisation a current answer when a creator relationship is questioned.

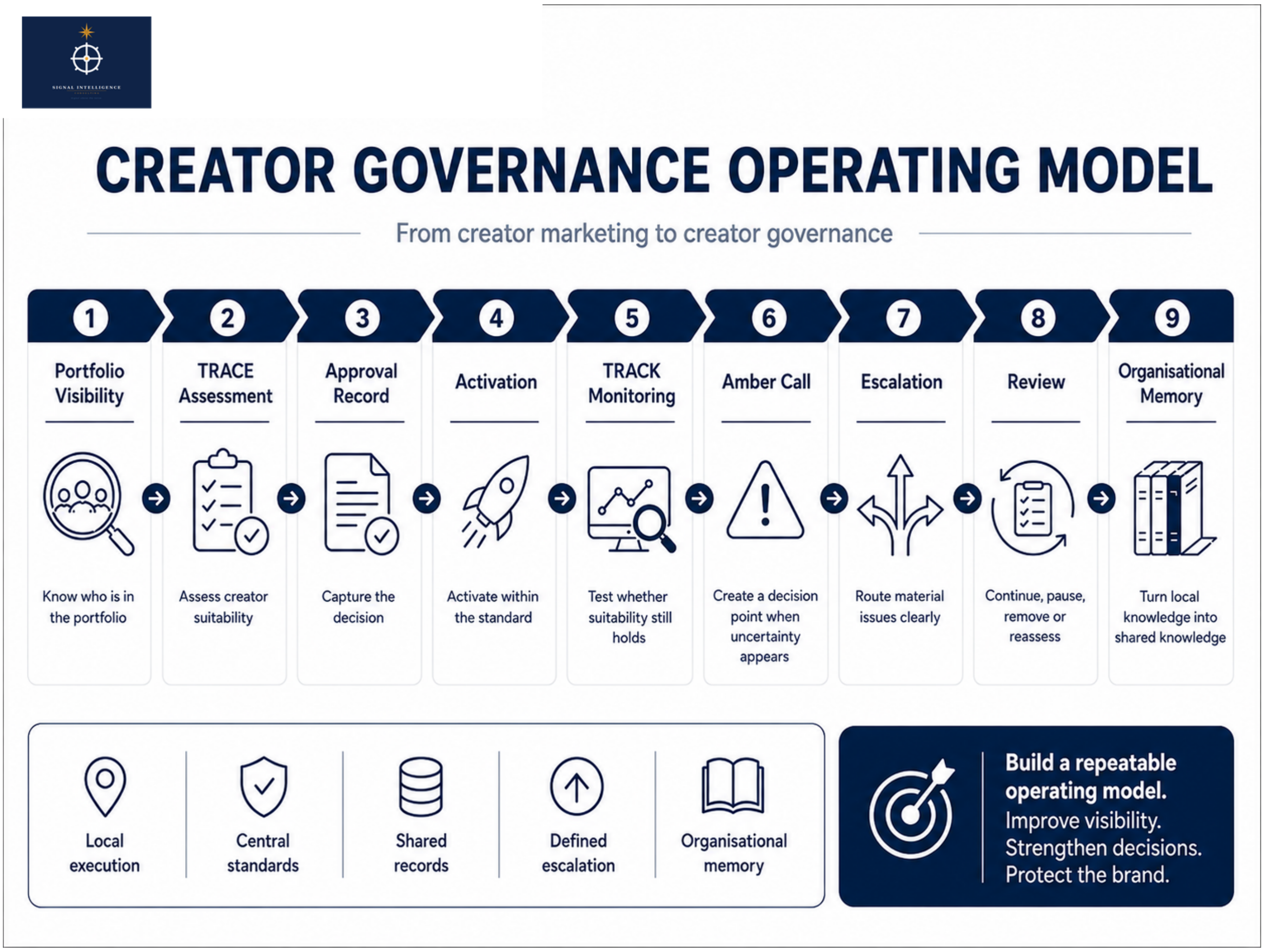
Not a vague answer.

Not a reconstruction after the fact.

A record.

The Operating Model

The Creator Governance Operating Model can be understood as a lifecycle.



Each stage has a different purpose.

Portfolio visibility answers who the organisation is working with.

TRACE assessment answers whether the creator is suitable.

The approval record captures why the decision was made.

Activation turns approval into a live relationship.

TRACK monitoring tests whether suitability still holds.

The Amber Call creates a decision point when uncertainty appears.

Escalation ensures material issues do not drift.

Review determines whether to continue, pause, remove, reuse or reassess.

Organisational memory ensures the same lesson does not have to be relearned by every team.

The model is simple because it has to be usable.

But it is also disciplined because creator relationships are no longer too small, too informal or too fast-moving to govern.

Stage One: Know Who Is In The Portfolio

The first step in Creator Governance is visibility.

You cannot govern a creator portfolio you cannot see.

Many organisations underestimate this problem because creator activity is often fragmented. One brand team may have its own list. One market may work with a local agency. One campaign may use creators on Instagram, another on TikTok, another on YouTube, another through affiliates, another through events or gifting. Some creators may be active partners. Some may be dormant but reusable. Some may still have usage rights attached. Some may have been approved by one team but unknown to another.

Before an organisation can assess suitability, monitor change or create a governance record, it needs to know who is actually in scope.

This sounds basic.

It often is not.

Creator records may contain incorrect handles, missing handles, outdated names, broken links, duplicate entries or creators who cannot be confidently matched to the intended account. That is not just an administrative issue. It is a governance issue. If the organisation cannot demonstrate that it knows who it is dealing with, it cannot demonstrate that it has assessed the right person.

Portfolio visibility is therefore the starting point.

It creates the base record. It identifies who is in the portfolio, which brands or markets are connected to them, which platforms matter, and where identity confidence is weak. It also reveals whether the organisation has a creator list or only a collection of campaign memories.

The first question is not whether every creator is risky.

The first question is whether the organisation knows who its creators are.

Stage Two: Assess Suitability Before Approval

Once the organisation knows who is in scope, it needs a way to assess suitability.

This is where basic creator checks often fall short.

A creator may have a clean recent feed, strong engagement, a relevant audience and no obvious brand safety alerts. That may help with selection. It does not necessarily create a defensible basis for approval.

Creator suitability is broader than feed cleanliness.

It includes trajectory, reputation, alignment, content and exposure. It asks whether the creator is moving toward or away from risk. It considers the public record. It assesses whether the creator fits the organisation, category and audience. It reviews content behaviour across relevant platforms. It weighs the likely consequence if the relationship becomes controversial.

That is the purpose of TRACE.

A TRACE assessment asks a more serious question than whether a creator looks useful for a campaign.

It asks whether the organisation can defend the decision to work with them.

This matters because creator relationships do not exist in the abstract. A creator suitable for one organisation may be unsuitable for another. A creator suitable for a low-sensitivity fashion activation may require deeper review for financial services, healthcare, alcohol, children’s brands, gambling or any category where audience trust, regulation or public expectation is more fragile.

Suitability is contextual.

That is why Creator Governance cannot rely only on generic safety signals. It needs an assessment process that connects the creator to the brand, the category, the audience and the likely consequences of association.

The answer is not to approve fewer creators.

The answer is to make creator approval more defensible.

Stage Three: Create The Approval Record

Approval should create a record, not just a campaign.

This is one of the central differences between creator marketing as execution and Creator Governance as discipline.

In many organisations, approval is a moment. A creator is selected, discussed, cleared, added to the plan, contracted, briefed and activated. The campaign moves forward. The work gets done.

But later, if the relationship is questioned, the organisation may struggle to show why the creator was approved in the first place.

That is the gap the approval record closes.

An approval record should capture what was assessed, what was found, what decision was made, who made it, whether any conditions were attached, when the decision was made, and when the decision should be reviewed.

It should also capture uncertainty.

This is important. Good governance does not pretend every creator is obviously safe or unsafe. Some decisions involve judgement. Some creators carry visible but manageable issues. Some require conditions. Some require category-specific caution. Some are appropriate for one brand but not another. Some should be approved for a single campaign but reviewed before reuse.

The approval record is where that judgement becomes visible.

Without it, the organisation is left with memory, emails, meeting notes, agency context, platform screenshots or informal assumptions. Those may help operationally, but they are weak as governance evidence.

Approval without a record is only a memory.

And memory is not a reliable operating model.

Stage Four: Activate Within The Standard

Creator Governance should not stop campaigns from moving.

It should give campaigns a clearer basis for moving.

Once a creator has been assessed and approved, activation can proceed with greater confidence. The team knows the creator has been reviewed. It knows whether any conditions apply. It knows whether there are category sensitivities, competitor considerations, disclosure issues, content boundaries or review requirements. It knows when the approval expires or when the creator should be reassessed.

This is especially useful for agencies and local teams.

A central standard does not mean every decision has to be made centrally. A local team can still run the campaign, manage the creator, shape the brief and deliver the work. But it does so within a standard the organisation owns.

That distinction matters.

Local teams can execute. The organisation must own the standard.

The operating model gives teams permission to move without pretending every campaign is a fresh judgement call. It also gives them a route to ask for review when something does not fit the standard.

This is how Creator Governance avoids becoming a bottleneck.

It does not replace the campaign process.

It strengthens the process behind the campaign.

Stage Five: Monitor For Change

Approval is not permanent.

A creator who was suitable when approved may not remain suitable six months later. Their content may drift. Their audience may change. Their commercial relationships may shift. Their public reputation may evolve. A legal issue may emerge. A competitor partnership may appear. A previously minor issue may become more visible because the external context has changed.

This is why monitoring matters.

Monitoring does not exist to create noise. It exists to test whether suitability still holds.

TRACK should not overwhelm teams with every minor post, trend or mention. Creator Governance requires judgement about materiality. The question is not whether anything changed. Something is always changing. The question is whether the change affects suitability, approval conditions, category fit, reputational exposure or the organisation’s ability to defend the relationship.

A credible monitoring process should therefore produce a current record.

It should identify material changes. It should distinguish between noise and signals. It should show whether a creator remains stable, whether an Amber issue has appeared, whether a Red issue requires escalation, whether a previous condition needs review, or whether a creator should be reassessed before reuse.

Monitoring becomes especially important for large portfolios.

At portfolio level, individual creator change can become governance exposure. One creator drifting into a new category may be manageable. Many creators drifting away from the organisation's brand position may change the shape of the portfolio. One competitor partnership may be incidental. Multiple creator conflicts may reveal a wider commercial control issue. One expired review may be administrative. Many expired reviews may indicate that creator suitability is not being maintained.

Monitoring gives the organisation a current view.

Without it, approval slowly becomes outdated confidence.

Stage Six: Make The Amber Call

The operating model must make Amber impossible to ignore.

Red decisions are often visible. If a creator has an active scandal, serious legal issue, direct category breach or immediate reputational problem, the need for escalation is usually clear. Those cases can still be commercially difficult, but the governance question is often obvious.

Amber is harder.

Amber means the relationship requires judgement.

It may involve a historic issue that is visible but not current. It may involve a competitor relationship that matters more in one category than another. It may involve political content, audience sensitivity, a change in creator direction, a public association, a recurring disclosure weakness, a creator-owned business, or a reputational issue that is not severe enough to reject but too relevant to ignore.

Amber is where Creator Governance is tested.

If the operating model does not define who owns the Amber Call, the organisation will drift. Sometimes Amber will be treated as Red because nobody wants to own the judgement required to proceed. More often, Amber will be treated as Green because nobody wants to slow the campaign down.

That is not governance.

The Amber Call creates a decision point.

It asks what was found, why it matters, whether the relationship remains suitable, whether conditions are needed, whether senior sign-off is required, whether the creator should be reassessed, and whether the decision should be recorded for future use.

The purpose is not to eliminate risk.

The purpose is to make the decision visible.

Amber is not a verdict. It is a prompt for ownership.

Stage Seven: Escalate Without Improvising

A crisis is the wrong time to design the escalation process.

If a creator issue becomes public, the organisation needs to know what happens next. Who reviews the issue? Who owns the decision? Who can pause live activity? Who speaks to the agency? Who checks the contract? Who reviews paid media? Who checks brand channels? Who prepares the communications response? Who decides whether the creator remains suitable? Who records the outcome?

Those questions should not be invented under pressure.

The operating model should define escalation before escalation is needed.

Not every issue requires senior intervention. Not every signal needs legal review. Not every creator change is a crisis. But when a material issue appears, the route should be clear. The organisation should know how the issue is classified, who reviews it, what thresholds apply, what actions are available and how the decision is recorded.

This protects the organisation from two common failures.

The first is underreaction. A material issue is noticed but not owned. It sits in messages, meetings or agency calls until the campaign has already moved forward.

The second is overreaction. A manageable issue becomes a crisis because the organisation has no calm process for reviewing it.

Defined escalation creates discipline.

It allows the organisation to move quickly without guessing.

Stage Eight: Review, Reuse, Pause Or Remove

Creator relationships do not end when a campaign ends.

A creator may be reused. Content may remain live. Usage rights may continue. Paid media may still be running. Affiliate links may remain active. A creator may appear in brand channels, retail assets, PR materials, event content or future campaign planning. A relationship that looks finished operationally may still carry association.

The operating model therefore needs a review stage.

Before reuse, the organisation should know whether the previous approval still applies. If the creator has remained stable, reuse may be straightforward. If there has been a material change, the relationship may need a fresh assessment, new conditions, senior review or escalation. If the creator is no longer suitable, the organisation may need to pause or remove activity.

This is where monitoring, records and ownership come together.

A creator who was Green last year may not be Green today. An Amber creator approved with conditions may require those conditions to be checked. A creator rejected by one market may need to be visible to another. A creator involved in a controversy may be inappropriate for immediate reuse but suitable later after review. A creator whose content has drifted may still be valuable, but not for the same brand, category or audience.

Reuse should not rely on habit.

It should rely on a current suitability view.

That is how the organisation avoids repeating old decisions without checking whether the basis for them still holds.

Stage Nine: Turn Learning Into Organisational Memory

Creator Governance becomes more valuable over time because the organisation learns.

Every assessment creates knowledge. Every Amber Call creates judgement. Every escalation creates precedent. Every monitoring cycle creates a record of change. Every approval condition creates context. Every pause, rejection or reassessment creates information that should help the next decision.

The problem is that this knowledge often stays local.

One market learns something. Another market never sees it. One agency holds context. The new agency starts from scratch. One brand team approves with conditions. Another brand team treats the creator as new. One campaign identifies a concern. Another campaign repeats the same review months later.

That is wasteful.

It is also risky.

Creator Governance fails when the same lesson has to be relearned by every team.

The operating model should turn local knowledge into organisational memory. It should create a shared governance view where previous decisions, current status, conditions, review dates and material changes can be seen by those who need them.

That does not mean every team needs access to everything. Permissions and confidentiality may matter. But the organisation should not behave as if each creator decision is isolated from every previous decision.

The record should get stronger over time.

That is the difference between a campaign archive and a governance system.

What The Operating Model Prevents

A Creator Governance Operating Model prevents the common failures that make creator relationships difficult to defend.

It prevents the clean-feed illusion, where a creator looks acceptable because recent content appears safe while the real issue sits in reputation, alignment, exposure, commercial conflict or prior decision history.

It prevents approval without memory, where someone approved the creator but nobody can later show what was checked, what was found or why the decision was made.

It prevents Amber drift, where a concern is noticed but quietly becomes permission to continue because nobody owns the judgement.

It prevents monitoring without response, where a system identifies change but the organisation has no defined route for deciding what to do next.

It prevents local learning from disappearing, where one team knows something important but the wider organisation acts as if the creator has never been reviewed.

It prevents crisis improvisation, where the organisation tries to design ownership, escalation and decision-making only after the issue is public.

Those are not theoretical failures.

They are the predictable result of treating creator activity as campaign execution without building the governance layer around it.

What The Operating Model Does Not Do

The operating model should not turn creator marketing into a slow, fearful or bureaucratic process.

That is the wrong answer.

Creator marketing works because creators move quickly, audiences respond to personality, culture changes fast, and campaigns often depend on timing, relevance and trust. A governance model that kills all of that would fail commercially even if it looked safe on paper.

The operating model does not require legal to approve every creator. It does not require compliance to sit inside every campaign. It does not require communications to manage routine activation. It does not require agencies to be replaced. It does not require every creator decision to go to a central committee.

It requires clarity.

It requires standards that local teams can use. It requires records that can be defended. It requires monitoring that focuses on material change. It requires ownership when judgement is needed. It requires escalation before crisis. It requires organisational memory.

That is a different proposition.

Creator Governance should help organisations move with more confidence, not less.

From Maturity To Capability

Paper 6 introduced the Creator Governance Maturity Framework, which describes a progression from informal, campaign-by-campaign decision-making to a governed model where creator suitability is assessed, monitored, recorded and owned.

At Level 1, creator decisions are ad hoc.

At Level 2, they are managed through process.

At Level 3, they are assessed.

At Level 4, they are monitored.

At Level 5, they are governed.

The operating model is how an organisation moves through those levels.

It does not need to reach Level 5 immediately. Most organisations will start with visibility, then assessment, then records, then monitoring, then escalation, then shared governance. That is normal. Creator Governance is a capability that develops over time.

The important point is direction.

An organisation does not become governed because it buys a platform, adds a clause, runs a brand safety check or asks an agency to be careful. It becomes governed when creator suitability is assessed, recorded, monitored, owned and reviewed as part of a repeatable operating model.

That is the shift.

> *From scattered judgement to shared standards.*
> *From campaign memory to decision record.*
> *From approval at a moment in time to continuing suitability.*
> *From local knowledge to organisational memory.*
> *From creator marketing as execution to Creator Governance as discipline.*

Where Signal Intelligence Fits

Signal Intelligence exists to support this operating model.

It does not replace the organisation's judgement. It does not own the brand's appetite for risk. It does not decide what the organisation should care about. It does not remove the need for internal ownership.

The brand owns the association.

But organisations need evidence, structure and a current view.

Signal Intelligence helps create that view.

A Portfolio Audit shows who is in the creator portfolio, where obvious governance gaps exist, and which relationships may require further review.

TRACE assessments create a documented suitability baseline across trajectory, reputation, alignment, content and exposure.

Approval records help turn creator decisions into defensible organisational evidence.

TRACK monitoring tests whether creator suitability still holds over time.

Amber Calls create structured decision points when judgement is required.

Escalation support helps organisations understand what has changed, why it matters and what decision needs to be made.

The purpose is not to make creator marketing afraid of itself.

The purpose is to give organisations the governance layer that creator marketing now requires.

The End Of The Beginning

Creator marketing has matured.

The governance around it now has to mature as well.

The early phase of influencer marketing rewarded speed, access, authenticity, audience fit and creative instinct. Those things still matter. They will always matter. But creator relationships now carry too much brand trust, regulatory sensitivity, commercial value and reputational consequence to be managed only as campaign activity.

A creator is not just media inventory.

A creator is not just a content supplier.

A creator is a public representative of the brand relationship the organisation has chosen to create.

That relationship needs governance.

Not because every creator is dangerous.

Not because every campaign is high risk.

Not because marketing teams have failed.

Because creator marketing has become important enough to deserve an operating model.

The future of the discipline will not belong to organisations that avoid creators. It will belong to organisations that can work with creators confidently, creatively and defensibly.

That is the purpose of Creator Governance.

> *Local execution.*
> *Central standards.*
> *Shared records.*
> *Defined escalation.*
> *Organisational memory.*

That is how creator marketing becomes governable.

That is how brands move from campaign-by-campaign judgement to portfolio-level oversight.

Creator marketing has outgrown informal control.

Creator Governance is the operating model that comes next.

About The Signal Papers

The Signal Papers explore the emerging discipline of creator governance, creator due diligence and portfolio monitoring.

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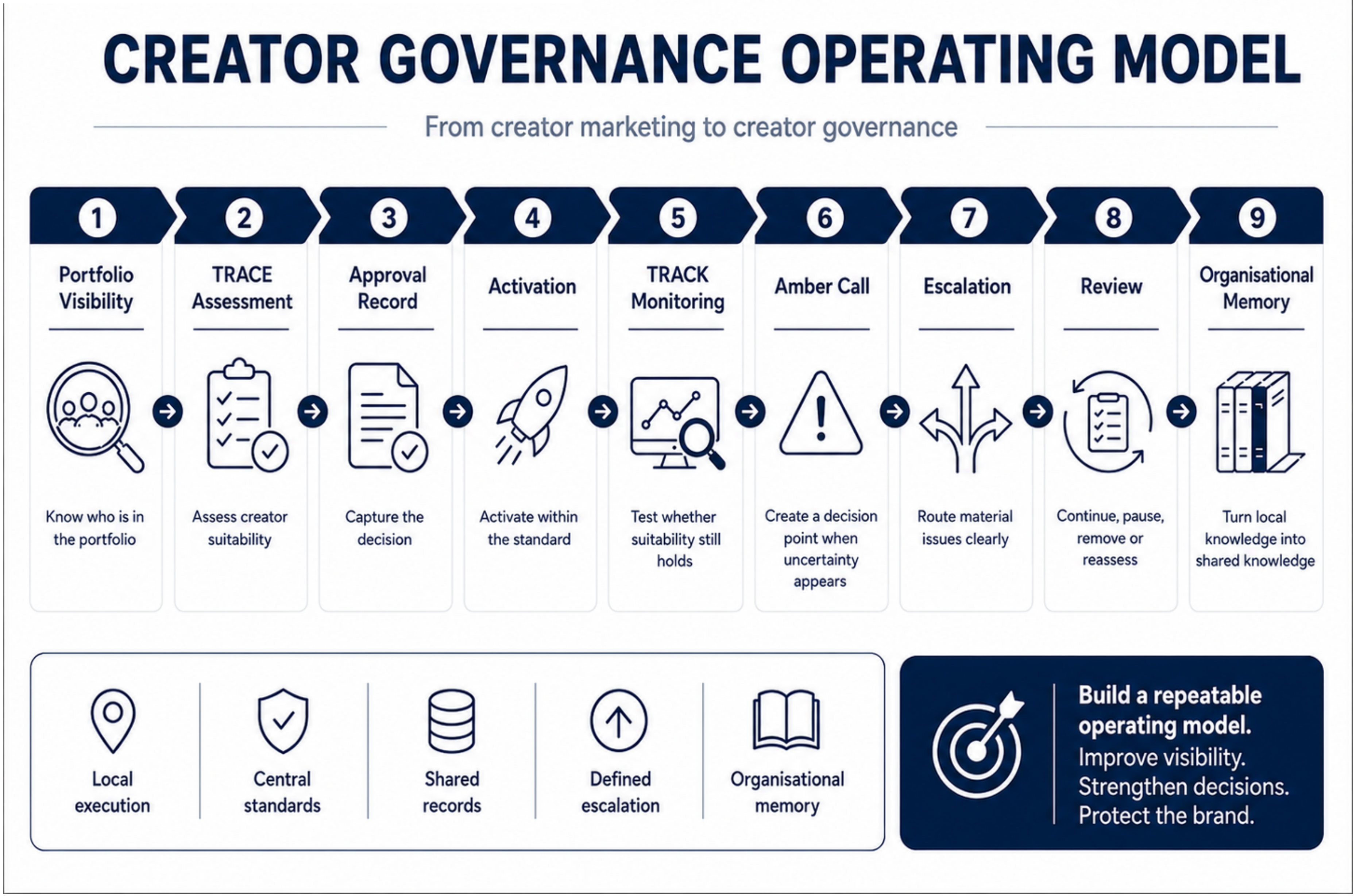
CREATOR GOVERNANCE OPERATING MODEL
From creator marketing to creator governance
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Portfolio Visibility
Know who is in the portfolio
2
TRACE Assessment
Assess creator suitability
3
Approval Record
Capture the decision
4
Activation
Activate within the standard
5
TRACK Monitoring
Test whether suitability still holds
6
Amber Call
Create a decision point when uncertainty appears
7
Escalation
Route material issues clearly
8
Review
Continue, pause, remove or reassess
9
Organisational Memory
Turn local knowledge into shared knowledge
Local execution
Central standards
Shared records
Defined escalation
Organisational memory
Build a repeatable operating model.
Improve visibility.
Strengthen decisions.
Protect the brand.