SIGNAL INTELLIGENCE
CONSULTING
Signal above the noise.

# What We’ve Learned About Creator Governance

30 issues. 10 papers. One emerging business discipline.

A briefing for brand, communications, legal, compliance and marketing leaders.

## Executive Summary

Creator marketing has matured faster than the governance structures around it. That is the central lesson from thirty issues of The Signal and ten Signal Papers.

For years, creator marketing was treated primarily as a campaign channel. Who has the right audience? Who fits the brief? Who performs? Who can create authentic content? Who can reach the right community at the right price?

Those questions still matter. But they are no longer enough.

Creators now carry brand trust, audience access, commercial influence, regulatory exposure, reputational consequence and public association. In sensitive categories, they can also create legal, compliance and stakeholder risk that was never fully anticipated when influencer marketing first scaled.

The governance problem is not simply that creators sometimes behave badly.

The deeper problem is that many organisations cannot show how creator decisions were made.

They may not have a verified creator portfolio. They may not have a documented suitability assessment. They may not know when a creator was last reviewed. They may not have a record of concerns considered, conditions attached, approvals granted or risks accepted. They may rely on agency memory, campaign spreadsheets, platform checks or informal judgement. They may only review creator relationships when something goes wrong.

That is not Creator Governance.

Creator Governance is the operating discipline that makes creator decisions visible, defensible and repeatable. It starts with portfolio visibility, requires assessment before approval, creates a decision record, monitors change over time, defines who owns Amber decisions, establishes escalation routes and turns local knowledge into organisational memory.

**The conclusion is simple.**

> **Brand safety checks are not enough.**
>
> **Approval is not permanent.**
>
> **Amber requires judgement.**
>
> **Ownership cannot be outsourced.**
>
> **Creator marketing has become important enough to deserve an operating model.**

## The Governance Gap

Most organisations would not onboard a supplier without basic due diligence.

They would expect procurement review, contract controls, compliance checks, financial scrutiny, data protection review, insurance requirements and documented approval. Yet a creator can represent a brand to millions of consumers with far less scrutiny.

They may be selected because the audience looks right, the engagement looks strong, the content looks clean or the agency recommends them. A platform provides a brand safety score. A campaign team reviews recent posts. Legal checks the contract. The creator is approved and activated.

But if the relationship is later questioned, the organisation may struggle to answer the questions that matter.

> Who approved this creator?
> What was checked?
> What was found?
> Were any concerns considered?
> Was approval conditional?
> When was the creator last reviewed?
> Who owns the decision now?

**That is the governance gap.**

It is not a case against creator marketing. Creator marketing remains powerful because people trust people, audiences respond to personality and creators can build relevance in ways traditional advertising often cannot. The issue is not whether organisations should work with creators. They should.

The issue is whether they can govern the relationships they create.

A creator is not just media reach. A creator is not just content supply. A creator is a public representative of the brand relationship the organisation has chosen to create. That relationship needs governance.

## The Core Shift

Creator marketing is no longer just a campaign channel. It is a public, reputationally sensitive third-party relationship.

That shift changes the standard of control required around creator decisions.

In the early phase of influencer marketing, creator selection was often judged by audience, authenticity, engagement, content style and campaign fit. The creator was treated as media reach, creative talent or a content supplier. Today, that framing is incomplete.

A creator's content, conduct, audience, reputation, commercial associations, public record and direction of travel can all affect the organisation that works with them. The creator does not need to be an employee to create organisational exposure, a formal spokesperson to shape public perception, or sit inside the company to carry brand trust.

| | | |
|---|---|---|
| **Then:** Creator as media reach | → | **Now: Creator as public association** |
| **Then:** Campaign fit | → | **Now: Continuing suitability** |
| **Then:** Brand safety check | → | **Now: Defensible approval record** |
| **Then:** Agency memory | → | **Now: Organisational memory** |
| **Then:** Informal escalation | → | **Now: Defined ownership** |
| **Then:** One-off approval | → | **Now: Monitored relationship** |

**The future of creator marketing is not less creativity. It is better governance around the relationships.**

## Ten Things We've Learned

The central lessons from 30 issues of The Signal and 10 Signal Papers

These ten lessons form the case for Creator Governance as a business discipline. They show why basic checks are no longer enough, why creator suitability changes over time, why Amber decisions require ownership, why the decision record matters, and why organisations need a portfolio-level operating model rather than campaign-by-campaign judgement.

LESSON 01

### Creator Marketing Has A Due Diligence Gap

Most organisations apply more due diligence to a supplier than a creator representing their brand to millions of consumers.

A supplier may be subject to procurement checks, financial review, contract controls, data protection review, compliance screening and onboarding standards. A creator may be selected because they have the right audience, produce good content and appear safe in a platform. The difference is hard to defend.

Creators carry identity, audience trust, cultural meaning, personal reputation and public association. When a brand works with a creator, it borrows that creator's relationship with their audience. But the creator also borrows the brand.

You need a credit check to borrow £5,000. You often need no equivalent check to influence five million consumers. That imbalance is no longer sustainable.

**WHY IT MATTERS**

If a creator relationship becomes controversial, the organisation will be asked why it chose that creator. It will not be enough to say the audience looked right or the agency recommended them. The organisation needs a defensible basis for the decision.

**QUESTION TO ASK**

Can we demonstrate that creators representing our brand have been assessed with the same seriousness we apply to other third-party relationships?

LESSON 02

## Brand Safety Is Not Creator Governance

A clean feed is not a defensible decision.

Brand safety checks are useful. They help identify obvious problems: unsafe keywords, adult content, profanity, extreme topics. But basic checks often ask whether anything obvious prevents approval. Creator Governance asks whether the organisation can defend the decision to approve.

One is about selection. The other is about defensibility.

A creator may have no obvious unsafe content and still raise governance questions: a history of disclosure failures, an unresolved reputational issue, a competitor relationship, or political and regulatory risks that do not show up as profanity or unsafe keywords. The absence of profanity is not evidence of suitability.

Creator Governance connects the creator to the brand, category, audience, public record and likely consequence of association. It asks whether the decision can be documented, reviewed and defended.

**WHY IT MATTERS**

When a creator issue becomes public, the organisation does not need another influencer profile check. It needs the decision record.

**QUESTION TO ASK**

Do our current checks tell us whether a creator looks clean, or whether the relationship is defensible?

LESSON 03

## Creator Suitability Is Contextual

A creator is rarely universally safe or unsafe. Suitability depends on context.

The same creator may be appropriate for a low-sensitivity lifestyle campaign and inappropriate for a regulated financial services campaign. Suitability depends on the brand, category, audience, geography, timing and likely exposure. That is why generic scoring has limits.

A platform may show a creator as low risk in general. But the real question is whether the creator is suitable to represent this organisation, in this category, at this point in time. That is the logic behind TRACE.

## Why Context Matters

If suitability is contextual, creator approval cannot rely only on generic safety signals. It needs to reflect the organisation's risk appetite, category sensitivity and public responsibility.

**Context determines consequence.**

That is why TRACE assesses creator suitability across five dimensions — not as a generic score, but as a structured assessment of this creator, for this organisation, in this context.

## TRACE — The Five Dimensions of Creator Suitability

Signal Intelligence's creator assessment methodology

### TRACE — Five Dimensions of Creator Suitability

| T | R | A | C | E |
|---|---|---|---|---|
| **Trajectory** | **Reputation** | **Alignment** | **Content** | **Exposure** |
| Direction of travel, risk trend, content drift, stability. | Public record, documented incidents, legal history, controversies. | Brand fit, category suitability, values, commercial conflicts. | Platform behaviour, disclosure, authenticity, content themes. | Reach, amplification risk, audience sensitivity, consequence. |

**A basic creator check supports selection. A TRACE assessment supports defensible approval.**

LESSON 04

# Approval Is A Point In Time. Monitoring Is A Process.

A previous approval is not a current approval.

A creator who was suitable when approved may not remain suitable six months later. Their content may drift. Their commercial relationships may shift. A legal dispute may emerge. A competitor partnership may appear.

Most creator change is not material. Most posts do not matter. Most signals are noise. But some changes do matter: a creator may move into political content, begin promoting a competitor, or attract regulatory attention. Without monitoring, approval slowly becomes outdated confidence.

TRACK turns creator monitoring into a current record of continuing suitability.

**WHY IT MATTERS**

If an organisation cannot show when a creator was last reviewed, it cannot show whether the original approval still holds.

**QUESTION TO ASK**

Do we know whether our approved creators are still suitable today?

**Approval creates the relationship. Monitoring protects it.**

LESSON 05

## Creator Risk Is Not Only Creator Misconduct

For years, creator risk was framed as the risk that creators might damage brands. That is still true. But recent cases show a wider pattern.

Brands are no longer only the victims of creator conduct. In some cases, they are the actors.

Polymarket shows how creator risk can emerge from payment governance and disclosure infrastructure. The issue was not simply whether creators disclosed. It was whether the corporate process was designed to produce disclosure or avoid it.

The class action wave against brands including Celsius, Shein, Revolve, Alo Yoga and Gymshark shows how undisclosed influencer marketing can become a financial litigation theory. The EBY Inc. lawsuit shows the risk can flow the other way: a brand allegedly used AI to generate a deepfake of its own ambassador. The creator became the victim.

Creator Governance is not only about detecting bad creators. It is about governing the full relationship: payment, disclosure, contracts, approval, likeness rights, usage, monitoring, evidence, escalation and ownership.

> **WHY IT MATTERS**
> If the governance structure fails, risk can emerge even when the creator did nothing wrong.
>
> **QUESTION TO ASK**
> Are we governing creator conduct only, or the full creator-brand relationship?

LESSON 06

## The Missing Asset Is The Decision Record

When a creator issue becomes public, the organisation does not need another influencer profile check. It needs the decision record.

Who approved this creator? When were they last reviewed? Were any concerns flagged? Was approval conditional? Who accepted the risk? Did anything change after approval? Why did the organisation decide that this person was suitable to represent the brand?

These questions become urgent when pressure arrives. But the answers need to exist before pressure arrives. Too often, creator approval exists as a moment rather than a record. The campaign moves forward. Later, if the relationship is questioned, the organisation may be reconstructing the decision from emails, spreadsheets, agency notes or memory. That is weak governance.

The record needs to be clear, dated and auditable: what was checked, what was found, who decided, what conditions applied, when the decision expires.

## The Decision Record

# The answers need to exist before pressure arrives.

**01**
Who approved this creator?

**02**
When were they last reviewed?

**03**
Were any concerns flagged?

**04**
Was approval conditional?

**05**
Who accepted the risk?

**06**
Did anything change after approval?

LESSON 07

## Amber Is Where Governance Is Tested

Amber does not mean safe. It does not mean unsafe. It means the relationship requires judgement.

Red decisions are often easier to recognise. Amber is harder. An Amber finding may involve a historic issue that is visible but not current, a competitor relationship, political content, audience sensitivity, or a change in the creator's direction of travel.

If nobody owns the Amber Call, the organisation drifts towards one of two weak outcomes. It either treats Amber as Red because nobody wants to own the judgement required to proceed, or it treats Amber as Green because nobody wants to slow the campaign down. That second failure is more common and more dangerous.

The Amber flag quietly becomes a green light to continue. Nobody rejected the concern. Nobody documented why the risk was acceptable. Good Creator Governance does not remove judgement. It makes judgement visible, structured and defensible.

> **WHY IT MATTERS**
>
> Amber is the point at which governance becomes real. It forces the organisation to decide, document and own the outcome.
>
> **QUESTION TO ASK**
>
> Who owns the Amber Call in our creator programme?

LESSON 08

## Ownership Is Usually Distributed. Accountability Is Not.

Creator relationships often pass through many hands.

Marketing identifies the creator. An agency shortlists them. A platform provides data. Procurement manages contracting. Legal reviews terms. Brand teams approve creative. Social teams manage posting. Communications becomes involved if something goes wrong.

Each function may own part of the process. But that does not mean anyone owns the relationship as a governance risk. Partial responsibility is distributed. Overall ownership is absent. That is the ownership gap.

If the relationship becomes controversial, the question is not whether an agency suggested the creator, whether a platform returned a clean score, or whether the contract contained standard morality clauses. The question is why the brand decided that creator was suitable to represent it. Support can be external. Ownership cannot.

## The Ownership Imperative

Creator Governance can be supported by agencies, platforms and external partners. But the organisation must own the standard, the record and the final decision.

**Support can be external. Ownership cannot.**

| | |
|---|---|
| **The standard** | The organisation owns the creator suitability standard. Agencies and platforms may support the process, but they do not define what the brand can defend. |
| **The record** | The approval record, monitoring log and escalation trail must live inside the organisation, not only in an agency file, platform export or campaign spreadsheet. |
| **The final decision** | When an Amber question arises, someone inside the organisation must make and document the call. That cannot be outsourced. |

**The brand owns the association.**

LESSON 09

## Local Knowledge Has To Become Organisational Memory

Large organisations rarely have one creator programme. They have many.

Different brands, markets, teams, agencies and regions all work with creators. Each team may make reasonable decisions in isolation. The problem is that those decisions do not always become visible to the wider organisation.

A creator may have been reviewed before, flagged before, approved with conditions before or rejected before. But if that knowledge sits in a local spreadsheet or agency file, the wider organisation may behave as if no decision was ever made. Creator Governance starts from zero again.

The solution is not to centralise every creator decision. But the organisation needs one governance view: previous decisions, current status, review dates, conditions and material changes visible to the people who need them. The record should get stronger over time.

> **WHY IT MATTERS**
> Without organisational memory, Creator Governance depends on who remembers what.
>
> **QUESTION TO ASK**
> Does knowledge from one brand, market, agency or campaign become visible to the next team making a creator decision?

LESSON 10

## Creator Governance Is Becoming A Business Function

Creator marketing has outgrown informal control.

The next phase will not be defined by reach alone. It will be defined by whether organisations can govern the relationships they create. That does not mean avoiding creators. It means working with them confidently, creatively and defensibly.

Creator Governance brings together portfolio visibility, due diligence, suitability assessment, approval records, monitoring, Amber Calls, escalation and organisational memory. It does not replace marketing judgement or agencies. It creates the operating model around creator marketing so decisions can be made with clarity, evidence and ownership.

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.

## From Lessons To Operating Model

**WHY IT MATTERS**

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

**QUESTION TO ASK**

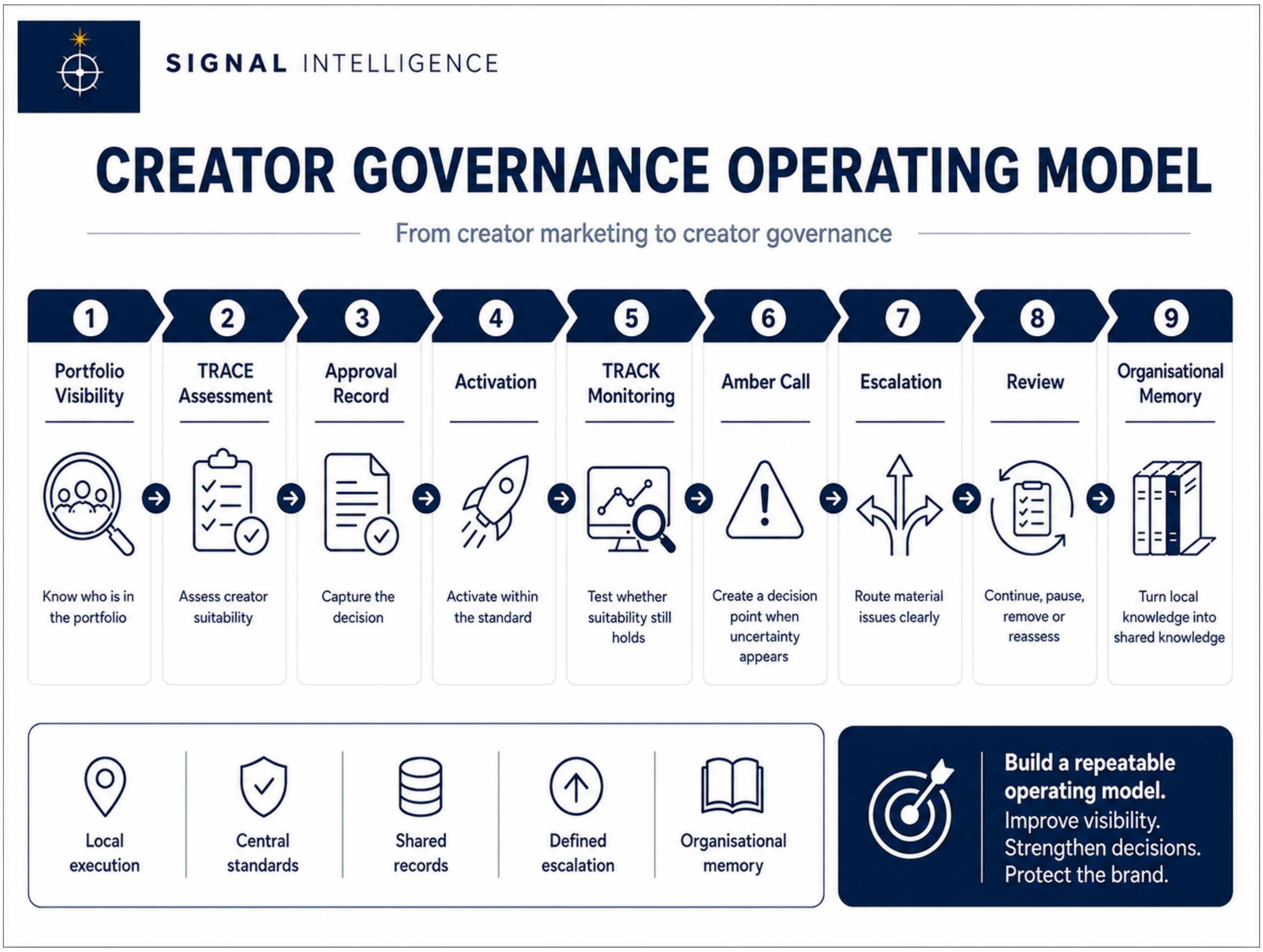
Are we managing creator marketing as a campaign channel, or governing it as a business relationship?

**Creator Governance is not a checklist. It is an operating model.**

The question is no longer whether creator relationships need governance. The question is what operating model makes that governance usable.

## The Creator Governance Operating Model

Creator Governance is not a checklist. It is a lifecycle. Each stage has a distinct purpose: portfolio visibility answers who the organisation is working with; TRACE assessment answers whether the creator is suitable; the approval record captures the decision; 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 issues do not drift; review determines the next step; and organisational memory ensures lessons are shared.




The nine-stage Creator Governance lifecycle — from portfolio visibility to organisational memory.

**The model is simple because it has to be usable. But it is disciplined because creator relationships are no longer too small, too informal or too fast-moving to govern.**

## TRACE Creates The Baseline. TRACK Tests Whether It Still Holds.

Creator Governance requires both assessment and monitoring.

### TRACE

TRACE creates the suitability baseline before a creator relationship begins.

**Trajectory** — direction of travel, risk trend, content drift.

**Reputation** — public record, incidents, legal history.

**Alignment** — brand fit, category suitability, values.

**Content** — platform behaviour, disclosure, authenticity.

**Exposure** — reach, amplification risk, audience sensitivity.

*TRACE asks: can the organisation defend the decision to work with this creator?*

### TRACK

TRACK monitors whether that suitability still holds over time.

It looks for material changes in content, reputation, commercial relationships, category alignment, exposure and continuing suitability.

Most creator change is not material. TRACK is designed to surface the changes that are.

*TRACK asks: does the original decision still hold?*

**Approval creates the relationship. Monitoring protects it.**

## The Evidence Base

Proof points from thirty issues of The Signal

The Creator Governance gap is no longer theoretical. Across thirty issues of The Signal, the pattern has been consistent: creator risk rarely sits in one place. It appears in conduct, contracts, payments, disclosure, likeness, regulation, ownership, monitoring and memory.

Issues 01, 04, 09

### Trust & Conduct

Chiara Ferragni / Pandorogate

A standard feed-level review would not have surfaced the core issue. Warning signals existed in the public record for two years before Pandorogate: commercial conduct, charitable framing and regulatory trajectory. None of these appear in a feed-level brand safety check.

**Brand safety checks are not enough.**

Issue 02

### Contextual Exposure

Bud Light / Dylan Mulvaney

The creator's content was not unsafe. The association itself became the signal. The same partnership in a different category, with a different audience, might have carried negligible risk. Suitability is not universal — it is contextual.

**Context determines consequence.**

Issue 08

### Historic Conduct Creates Future Liability

Fashion Nova / FTC

The FTC action showed that past conduct creates future exposure. Historic posts, prior relationships and legacy campaign activity can become the basis for enforcement action years later. The approval record matters long after the campaign ends.

**Approval without a record is only a memory.**

Issue 10

### The Monitoring Gap

Matilda Djerf / Djerf Avenue

A standard feed-level review would not have surfaced the core issue. Workplace conduct allegations emerged after a sustained period of commercial activity. The risk materialised in a domain entirely separate from the creator's published content.

**Monitoring has to look beyond feed-level signals.**

Issue 27

### Due Diligence Failure

Taylor Frankie Paul / ABC Disney

One of the highest-value exposure cases in the Signal archive. The warning signals were visible, but the assessment did not appear proportionate to the scale of the relationship being created.

**The cost of inadequate due diligence is quantifiable.**

Issue 31

### Payment & Disclosure

Polymarket + Class Action Wave

Polymarket showed creator risk emerging from payment infrastructure, not creator conduct. The class action wave — Celsius, Shein, Revolve, Alo Yoga, Gymshark — with more than $1.15bn in claimed damages, shows undisclosed endorsements have become a repeatable financial litigation theory.

**Creator governance is now financially visible.**

**Creator risk is becoming financially, legally and reputationally visible. Creator Governance is the response.**

## Twelve Questions Every Creator Programme Should Be Able To Answer

If a creator relationship were questioned tomorrow, could your organisation answer the following?

**01**
Do we know every creator currently representing the brand?

**02**
Are creator identities, handles and platform links verified?

**03**
Can we show when each creator was last assessed?

**04**
Can we show who approved each creator?

**05**
Can we show what concerns were considered before approval?

**06**
Can we distinguish Green, Amber, Red and conditional approval?

**07**
Who owns the Amber Call?

**08**
Who has authority to pause creator activity if risk changes?

**09**
Are legal, compliance and communications involved early enough?

**10**
Are creators reassessed before reuse?

**11**
Does knowledge from one brand, market or campaign become visible to others?

**12**
Can we produce a decision record if a creator relationship is challenged?

**If these questions cannot be answered clearly, the organisation has a campaign process — not a Creator Governance process.**

## What Good Looks Like

Creator Governance does not require every creator decision to become slow, fearful or bureaucratic. It requires clarity.

| Campaign Process Only | Creator Governance Model |
|---|---|
| Creator shortlist | Verified creator portfolio |
| Audience fit | TRACE suitability assessment |
| Content approval | Documented approval record |
| Contract | TRACK monitoring |
| Campaign report | Amber Call process |
| Agency context | Escalation route |
| Ad hoc escalation | Review before reuse |
| | Organisational memory |

**A campaign process can get creator activity live. A governance process makes that activity defensible.**

## Where Signal Intelligence Fits

Signal Intelligence helps organisations move from creator marketing process to Creator Governance discipline. It does not replace the organisation's judgement or 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.

| | |
|---|---|
| **Portfolio Audit** | A Creator Portfolio Audit gives the organisation a baseline view of its creator relationships: who is in the portfolio, where record quality is weak, where visible risk signals exist and where governance gaps appear. A Portfolio Audit is a governance triage, not a full manual review of every creator's complete social history. It gives the organisation a starting point. |
| **TRACE Assessment** | TRACE provides deeper creator due diligence where the relationship requires a documented suitability assessment. It combines public record review, direct-channel review where required, category context, brand alignment, reputational exposure and evidence-based judgement. It creates the suitability baseline. |
| **TRACK Monitoring** | TRACK monitors creator change over time. It helps organisations maintain a current view of creator suitability, identify material changes, review Amber findings and escalate Red issues. It turns approval from a point in time into an ongoing governance process. |

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