CREATOR RISK INTELLIGENCE

The Signal

Monthly intelligence on Creator Risk, regulatory change, and brand safety incidents. Issue 07 · July 2024

The Paris Olympics brought a new category of Creator Risk into focus: the athlete as creator. When the world's most recognisable sports figures become content producers, the brand safety questions multiply. This month's Signal examines what that means — and revisits a risk category that keeps producing incidents.

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01 — ATHLETES, CREATORS AND THE PARIS PROBLEM

Paris 2024 · Athletes as content producers · July 2024

The Paris Olympics opened on 26 July 2024 with the most digitally active athlete cohort in the history of the Games. More than 10,500 athletes participated. Most of them had social media accounts. Many had audiences that dwarfed the media organisations covering the event. And a significant number had commercial relationships with brands that were watching their content output in real time.

The IOC's social media framework

The International Olympic Committee published its social media guidelines for Paris 2024 in advance of the Games. Athletes were permitted to post personal content from within Olympic venues — a significant change from previous Games, where restrictions had been tighter. They could share their own experiences, behind-the-scenes content, and personal moments. What they could not do was create advertising content for non-Olympic sponsors, reference competing brands in ways that implied endorsement, or post content that brought the Olympic movement into disrepute.

That last category is where the brand safety risk lives. 'Content that brings the Olympic movement into disrepute' is a broad standard. It encompasses political statements, personal conduct, relationship conflicts, and anything that generates significant negative press coverage — the same territory that morality clauses in commercial contracts are designed to cover.

Why athletes are a distinct risk category

An athlete with a large social following is not the same as a lifestyle creator with a large social following. The differences matter for brand risk assessment.

Public record depth	Athletes have competitive histories, disciplinary records, anti-doping files, and financial disclosures that lifestyle creators typically do not. These records are often publicly accessible through national governing bodies, WADA databases, and sports journalism archives going back decades.
Compressed timelines	During a Games, an athlete's content volume spikes dramatically. A creator who posts twice a week normally might post ten times a day during competition. The risk monitoring challenge scales with the output.
Institutional complexity	Athletes typically have relationships with national Olympic committees, governing bodies, agents, and multiple commercial sponsors simultaneously. Brand safety incidents can trigger contractual consequences across multiple relationships at once.
Unscripted moments	The most significant brand safety incidents involving athletes in 2024 occurred not in sponsored content but in unscripted moments — post-race interviews, social media responses to trolling, or reactions to competitive outcomes — that were captured and shared without editorial control.

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Athletes are creators now — but vetting frameworks built for lifestyle influencers are not calibrated for athletes. The public record depth is different, the institutional complexity is different, and the unscripted content volume during competition windows creates monitoring challenges that standard tools do not address.

RECOMMENDED ACTION

Any brand activating athlete creators around major sporting events should conduct a pre-event assessment covering competition history, governing body disciplinary records, and prior brand incident history — not just the social media feed. Ask whether your current vetting process was designed for lifestyle creators or for athletes — they are different risk categories requiring different assessment criteria.

02 — THE PATTERN BEHIND THE TWEET

Historical content risk · 2024 pattern analysis · July 2024

The Doritos Spain case in March 2024 was the highest-profile example of historical content ending a live campaign. But it was not isolated. Three further incidents in the first half of 2024 followed an identical pattern: resurfaced historical content, rapid brand termination, and a post-incident disclosure that no historical audit had been conducted.

The pattern is consistent enough that it now warrants treatment as a structural risk category rather than a series of coincidences. In each case, the content that ended the partnership was publicly accessible at the point the partnership was signed. In each case, the brand's vetting process — where one existed — had focused exclusively on recent content.

How far back is far enough

There is no universal answer, but Signal Intelligence's emerging view is that the depth of a historical content audit should be proportionate to the value and visibility of the partnership. For gifting-tier activations with nano or micro creators, a two-year lookback on the primary platform is a reasonable baseline. For ambassador-level relationships — where the creator becomes a face of the brand — the search should extend to account creation, cover all public platforms, and include news archive searches and basic public record checks.

THE PLATFORM COVERAGE PROBLEM

Most historical content searches focus on Instagram and TikTok — the platforms where the partnership will be activated. But historical risk content is disproportionately likely to appear on Twitter/X, where the archive extends further and deletion is less common, or on now-defunct platforms where screenshots circulate on Reddit and forum threads. A search limited to current primary platforms is not a complete search.

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The posts that end partnerships are rarely the ones posted last week. They are posted years ago, often on platforms the creator no longer actively uses, and surfaced by audiences who are motivated to find them. The internet's memory is longer than any vetting process built around current content.

RECOMMENDED ACTION

Before activating any creator for a paid partnership, run a systematic search of their full public history across all platforms — not just the current primary feed. X Advanced Search, the Wayback Machine, and basic news archive searches are free tools that cover most cases.

03 — REGULATORY NOTE

ASA · Italy · USA · July 2024

A relatively quiet month for new regulatory developments, though several existing frameworks continue to generate enforcement activity.

UK	ASA AI-based Active Ad Monitoring is now conducting proactive sweeps. The regulator confirmed in July 2024 that it has identified non-compliant content across all major platforms in its first full quarter of AI-assisted monitoring. The shift from complaint-driven to proactive enforcement is now operational — not anticipated. Brands with UK creator programmes should treat ASA monitoring as a live risk, not a theoretical one.
ITALY	AGCOM's Code of Conduct for influencers remains in consultation. The DDL Beneficenza (Ferragni Law) continues to move through parliament. No final legislation yet, but Italy's regulatory intent is clear and enforcement is proceeding under existing frameworks. The AGCM has confirmed the Pandorogate fines stand while the criminal investigation continues separately.
USA	FTC enforcement against supplement and health product companies using undisclosed influencer testimonials continues. In July 2024 the FTC issued a further round of warning letters to companies in the health and wellness category. The FTC's proposed rule on fake reviews and social media indicators remains under active consideration following public comment periods — no final rule yet.

The broader pattern across all three markets: regulators are moving from reactive to proactive enforcement. The ASA's AI monitoring and the FTC's proposed rulemaking both represent a structural shift in how compliance will be policed. Brands that have relied on the low probability of complaint-driven enforcement should revise that assumption.