CREATOR RISK INTELLIGENCE

The Signal

Monthly intelligence on Creator Risk, regulatory change, and brand safety incidents. Issue 10 · October 2024

A Swedish fashion creator with a brand built entirely on warmth, inclusivity, and authentic personal expression faced allegations this month that her workplace operated in direct contradiction to everything she presented publicly. The Matilda Djerf case is a new category of Creator Risk — and one that standard vetting processes are entirely unequipped to detect.

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01 — DJERF AVENUE: WHEN THE BRAND IS THE PERSON

Matilda Djerf · Djerf Avenue · Sweden · October 2024

Matilda Djerf built one of the most recognisable personal fashion brands in Europe. Her aesthetic — warm, inclusive, slightly retro, consistently aspirational — translated into a global audience of millions and a fashion label, Djerf Avenue, that carried her visual identity into physical product. The brand was the person. The person was the brand.

In October 2024, Swedish newspaper Aftonbladet published an investigation based on testimony from 11 current and former Djerf Avenue employees. The allegations described a workplace characterised by what sources called psychological terror — fat-shaming, public humiliation of staff, a private toilet for Djerf that others were forbidden to use, and a culture of fear that had driven significant employee turnover. Djerf issued a statement acknowledging that her leadership had been inadequate and committing to improvements.

What made this case different

Unlike the Ferragni, Hudson, or Bud Light cases, the Djerf incident did not originate in content, legal proceedings, or regulatory exposure. It originated in employment culture — internal conduct that had no visible public footprint until journalists investigated. No post, no tweet, no historical content search would have surfaced it.

What made it acute was the misalignment between the brand's public values and the alleged private conduct. Djerf Avenue's brand positioning centres on warmth, community, and authenticity. The contrast between that positioning and the workplace allegations created a reputational gap that was difficult to bridge. Partners and advertisers who had selected Djerf precisely because of her values alignment found themselves associated with a brand whose internal culture appeared to contradict those values entirely.

READING THE RISK PROFILE — OCTOBER 2024

On every visible dimension, Djerf looks clean: strong commercial momentum, high values alignment with brand partners, consistently clean content. Standard vetting returns a positive result. The risk that materialised — employment culture — sits in a dimension that no content audit, no follower count check, and no platform tool would reveal. The signal existed. It was not in the feed.

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Employment culture is not visible in a creator's content feed. It is not in the public record. It is not in their legal history. It surfaces through investigative journalism, employee testimony, and reputation signals that require a different kind of monitoring. The Djerf case expands the definition of Creator Risk beyond what most brands are currently assessing.

RECOMMENDED ACTION

For creator-owned fashion brands, supplement the standard TRACE assessment with employee review monitoring across Glassdoor, LinkedIn, and regional employment forums. Culture misalignment is a brand safety risk when the creator's brand is built on values-based positioning.

02 — THE CREATOR-OWNED BRAND PROBLEM

Governance gap · Brand risk · October 2024

The Djerf case is not unique in structure — it is the clearest example yet of a pattern that has been building across the creator economy. When a creator launches their own product brand, the creator's personal conduct becomes the brand's governance risk. There is no board, no independent management, no separation between the person and the product.

Djerf Avenue, Kylie Cosmetics, Prime — these are businesses where the founder is also the chief marketing asset, the primary brand signal, and the operational decision-maker simultaneously. For brand partners, this concentration creates a specific category of exposure: the conduct risk that comes from investing in a business that has no governance structure capable of moderating the founder's behaviour.

The governance gap is not an abstract concern. In 2024, three creator-owned brands faced significant reputational incidents that their corporate parent brands — if they had corporate parents — would have had mechanisms to manage. Creator-owned brands have no such mechanisms. The founder is the board, the CEO, the brand director, and the compliance function simultaneously.

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A creator-owned brand has no governance structure capable of moderating founder conduct. When a brand partner activates a creator-owned brand as a partner or stockist, they are effectively endorsing not just the product but the governance standards of the person running it. That is a different risk assessment from activating an individual creator.

RECOMMENDED ACTION

For partnerships with creator-owned product brands — particularly in fashion, beauty, and wellness — ask a question that most vetting processes skip entirely: what is the governance structure of this business? The product brand and the person running it are not separable. Your due diligence should reflect that.

03 — REGULATORY NOTE

Italy · UK · USA · October 2024

ITALY	AGCOM Code of Conduct finalised in October 2024 — expected to apply to creators with 500k+ followers or 1M monthly views. The Code places Italian creators under the same regulatory framework as broadcast media for the first time. Maximum fine under the audiovisual media services framework: €600,000 — the highest creator-specific fine in Europe. Implementation timeline to be confirmed.
UK	The Digital Markets, Competition and Consumers Act 2024 received Royal Assent in May 2024 with enforcement of unfair commercial practices provisions beginning in April 2025. CMA powers significantly strengthened. Brands and creators running UK campaigns should note that DMCCA creates new enforcement routes beyond the existing ASA self-regulatory framework.
USA	FTC enforcement maintained across health, supplement, and financial product categories. No final rule on fake reviews yet. The FTC's informal hearings in early 2024 produced substantial public comment — the agency is expected to publish a final rule before year end. In the interim, existing Endorsement Guides enforcement continues with brands as primary targets.

Italy's AGCOM Code of Conduct represents the completion of a regulatory architecture that began with the AGCM's Pandorogate enforcement action in December 2023. In under twelve months, Italy has moved from a single regulatory fine to a comprehensive creator oversight framework. The speed of that development — driven by political will and public pressure — is a signal to other European markets that legislative action on influencer marketing is not a distant prospect.

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The Signal is published monthly by Signal Intelligence. Each issue covers real Creator Risk incidents, regulatory developments, and the intelligence that brand-side teams need before they need it. Subscribe at signalintelligence.consulting — and if this issue was forwarded to you, make sure you're on the list for the next one.