



CREATOR RISK INTELLIGENCE

The Signal

Monthly intelligence on Creator Risk, regulatory change, and brand safety incidents. Issue 17 · May 2025

Only 4.97% of brands cite brand safety as their key influencer marketing challenge. Yet 63% have encountered influencer fraud in past campaigns. The gap between perceived and actual risk is where the next incident is being built right now.

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01 — THE RISK PERCEPTION GAP

Industry data · Brand safety perception vs reality · May 2025

Influencer Marketing Hub's research tracking brand priorities for 2025 produced a finding that should be uncomfortable reading for anyone working in creator risk: brand safety ranks as the primary concern for fewer than five percent of brands. The same research found that nearly two-thirds of brands have experienced influencer fraud in prior campaigns. The gap between these two numbers is not a measurement artefact. It is a structural failure of risk perception.

The pattern is familiar from other risk categories. Before a significant incident, risk is perceived as low because the incident hasn't happened yet. After the incident, risk is perceived as high — but the investment in prevention is made after the damage is done. The ABC / Taylor Frankie Paul case, the Pandorogate settlement, and the Doritos Spain termination all have one thing in common: the brand had not perceived the risk as a priority before the incident. They perceived it clearly afterwards.

Why the gap exists

Survivorship bias

Brands remember the campaigns that went well. The near-misses — creators who were activated without a full assessment and happened not to generate an incident — are invisible in the data. The absence of an incident is not evidence that the process is working.



Category confusion

Many brands conflate brand safety with brand suitability — the question of whether a creator's aesthetic is right for the brand rather than whether the creator carries risk. These are different assessments. A creator can be brand-suitable and high-risk simultaneously.

Measurement gap

Influencer fraud is easy to measure — you can count fake followers. Reputational and regulatory risk are harder to quantify before they materialise. What doesn't have a number doesn't get managed.

Low base rate thinking

The probability of any single creator generating a brand safety incident in any single campaign is genuinely low. The probability of a creator programme generating at least one significant incident over a multi-year period is not. Risk at scale is different from risk at the individual creator level.

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The most dangerous brands in the creator economy are the ones that believe it won't happen to them. It is not a comfortable observation — but the data from eighteen months of tracking this space supports it consistently. The brands that have invested in creator risk assessment have not had major incidents. The brands that have not invested in it have.

RECOMMENDED ACTION

If brand safety is not in your influencer marketing team's top three priorities for 2025, map what you have spent on creator marketing in the past twelve months against what you have spent on vetting. The ratio will tell you whether your risk assessment and your budget allocation are aligned.



02 — THE ARPP'S EXPANDING REACH

France · ARPP 2025 Annual Report preview · May 2025

The ARPP's 2025 Annual Report — covering H1 2025 activity — confirmed a 222% increase in content analysed year-on-year. In the first half of 2025, the ARPP reviewed over 194,000 pieces of creator content across Instagram, TikTok, and YouTube. The most significant development in this year's report: speech-to-text analysis is now fully operational.

Speech-to-text analysis means that verbal brand mentions in video content — previously undetectable without manual review of individual videos — are now scanned as part of standard enforcement monitoring. A creator who says a brand name without showing on-screen disclosure text can now be identified as non-compliant. The compliance window has narrowed significantly.

The ARPP's data showed that non-disclosure rates remain high despite increased monitoring — suggesting that many creators and brands have not yet adapted their practices to the new enforcement reality. The gap between regulatory capability and industry compliance is the ARPP's primary focus for H2 2025.

WHAT SPEECH-TO-TEXT MONITORING MEANS IN PRACTICE

Any creator who verbally mentions a brand name in video content — in a haul video, a tutorial, a vlog — without displaying on-screen disclosure text is now detectable as non-compliant by the ARPP's AI system. This applies to gifted product and paid partnerships equally. Brands with French creators on any commercial arrangement should review verbal disclosure practices immediately.

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France now has the most technically capable influencer enforcement system in Europe. The combination of scale (194,000 pieces of content in H1 2025), speech-to-text detection, and joint brand liability creates an enforcement environment where non-compliance is highly likely to be detected.

RECOMMENDED ACTION

French brands and brands with French creator programmes should audit verbal disclosure practices across all video content — not just text overlays. Brief your creators explicitly on audio disclosure standards. The ARPP's speech-to-text system does not distinguish between a creator who didn't know and one who chose not to disclose.



03 — WHAT WE'RE WATCHING

Forward signals · May 2025

Digital Fairness Act	Still expected — the Commission's impact assessment is due Q2 2025. When published, this will be the most significant influencer marketing regulatory development in Europe since the GDPR. We will cover it in full.
Ferragni verdict	H1 2025 is ending without a verdict. Fast-track proceedings have extended. A verdict is now expected in summer or autumn 2025. The longer this takes, the more significant the precedent when it arrives.
ASA gifting sweep	The ASA confirmed in May 2025 it completed a targeted sweep of gifted content disclosure during the spring seeding season. Results expected Q3 2025. Brands whose creators received gifted product without disclosure guidance in Q1-Q2 2025 may feature in enforcement actions.



04 — REGULATORY NOTE

France · EU · UK · USA · May 2025

FRANCE	ARPP 2025 H1 Annual Report: 194,000 pieces of content reviewed, 222% increase year-on-year. Speech-to-text analysis operational. Non-disclosure rates remain high despite increased monitoring. ARPP focusing on brand-level enforcement in H2 2025.
EU	EU AI Act transparency requirements active. DSA 24-hour removal obligation active. Digital Fairness Act impact assessment expected imminently. EU regulatory environment is the most comprehensive in the world for AI-generated creator content.
UK	DMCCA in force. ASA gifting sweep complete — results Q3 2025. FCA influencer enforcement actions expected. CMA monitoring DMCCA compliance in influencer marketing category.
USA	FTC enforcement pace maintained. Consumer Reviews Rule active — fake social media indicators explicitly prohibited. FTC targeting AI-generated celebrity endorsements. No new rulemaking imminent — existing framework enforcement is the primary mechanism.

The convergence of AI regulation, creator marketing compliance, and consumer protection enforcement is creating a regulatory environment that is genuinely more complex than anything the influencer marketing industry has previously navigated. The brands that are managing this complexity systematically — with documented processes, clear ownership, and ongoing monitoring — are building a competitive advantage that their peers who are not doing so will find difficult to replicate quickly when an incident forces the issue.

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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.