

8 CHECKS. ONE DECISION. ONE DEFENSIBLE APPROVAL TRAIL.

The **8-Point Creator Diligence & Brand Safety Audit**: a vetting framework and a worked decision memo for sponsor teams, managers and agencies.

SPONSORS

MANAGERS

AGENCIES

Most creator approvals rest on follower counts and a quick look at a profile. That leaves no evidence when a campaign underperforms, a disclosure is missed or a conflict surfaces after the money moves.

37.2%

of 100,000 sampled Instagram and TikTok accounts were flagged suspicious or likely fraudulent (vendor estimate, 8–12% false positives). [6]

48.3%

flagged in the 100K–500K follower tier, where many larger deals are signed. [6]

50%+

of 117 US marketers surveyed spend 30 minutes or less vetting each influencer. [7]

\$53,088

maximum civil penalty per violation listed for relevant FTC Act provisions. Not automatic per missed disclosure; advertisers can be liable for undisclosed endorsements. [2–4]

Figures are attributed, scoped research findings, not universal rates. Thresholds in this guide are Kitscore proposals, not regulatory safe harbors. This is an audit-inspired framework, not a SOX certification, assurance opinion or legal advice.

BUILT BY AN AUDITOR

Gina Hamza, MBA (Accounting), CICA, founder of Kitscore. 13+ years testing controls in internal audit and SOX 404 across banking, insurance, energy and the public sector, including work alongside Big 4 external auditors. In audit, a decision only counts if there is evidence behind it, someone signed it off, and a third party can check the trail later. Creator budgets deserve the same standard.

Short on time? Start with the 2-page Pre-Campaign Check, then use this audit for the full thresholds and the worked decision memo.

THE 8-POINT CHECKLIST

Complete every check before committing budget. Thresholds and review windows are suggested internal policy; sources [1–7] are on the References page.

1 Audience authenticity & quality score

INSPECT Sudden follower spikes within 24 hours, geographic mismatch (e.g. 60% of followers outside the target market), generic bot-style comments, comment-to-like ratio against comparable creators.

PASS Suggested internal screen: at least 80% estimated genuine audience. Assess target-market fit separately.

RED FLAG Unexplained overnight growth above 15% or suspicious clusters. Signals, not proof of fraud: investigate.

2 3-year sentiment & controversy scan

INSPECT Search the creator handle with keywords such as scam, apology, cancelled, reddit, lawsuit, crypto.

PASS Clean public record, or acknowledged, resolved and brand-aligned context.

RED FLAG Open legal disputes, hate speech, past promotion of risky products, unaddressed backlash.

3 FTC & regulatory disclosure compliance

INSPECT Last 10 sponsored posts and all material connections: payments, gifts, affiliate arrangements. [1, 2]

PASS Clear, conspicuous disclosure with the endorsement. In video, disclose in the video itself, visually and audibly where both modes carry the endorsement. [1, 2]

RED FLAG Disclosure hidden behind “more”, unclear labels, or a platform tag relied on without checking prominence. [1, 2]

4 Exclusivity & category overlap

INSPECT Sponsored content for the past 90 and next 90 days against competing brands. Agencies: scan every signed deal across the roster, not just this one.

PASS Zero conflicting category partnerships during the agreed lock-out window.

RED FLAG A competitor campaign ran 18 days ago under an active 60-day non-compete.

5 Commercial reliability & on-time delivery

INSPECT Reference check, or your own or an agency's historical ledger, on revision turnaround and live-date adherence.

PASS Suggested internal screen: on-time delivery of at least 90%, plus a clear channel to the manager.

RED FLAG Missed deadlines or launch windows, or four or more revision cycles.

6 Saturation index

INSPECT Share of sponsored posts in the last 30 posts, compared like for like.

PASS Suggested internal screen: 25% or less sponsored (no more than 1 post in 4).

RED FLAG Review at 26–40%. Hold above 40% or a 60%+ fall in branded-post engagement.

7 Rights, whitelisting & paid usage

INSPECT Organic use, paid-media licensing and platform authorization, reviewed separately. Confirm Spark Ads creator permission where relevant. [5]

PASS Priced usage term, channels, territory and permitted edits specified; platform authorization covers the campaign. [5]

RED FLAG Vague terms that let the creator revoke ad access mid-flight; no agreed authorization code validity.

8 Payment & escrow structure

INSPECT Milestone release versus net-60 or net-90 terms; who holds the funds and when they release.

PASS Funds held in escrow and released only on verified draft approval and live-link confirmation.

RED FLAG Demand for 100% upfront payment, unverified escrow, or personal-account transfers.

Scoring note. The pass count gives a quick screening rating (8/8 low, 7/8 moderate, fewer than 7 high), but it is only a screen. Any unresolved material legal, disclosure or contract issue overrides the score and requires a hold. Checks 3, 4 and 8 carry the most financial and legal weight.

EXAMPLE DECISION MEMO

A completed one-page memo using illustrative sample data. Every approval should leave a record like this: who decided, on what evidence, under what conditions.

Creator	Priya Shah (sample data), beauty · Instagram and TikTok	
Campaign	Bloom Beauty spring launch · 1 Reel, 2 Stories · quoted fee \$3,200	
Reviewer / approver	Reviewer: Sponsor team lead · Approver: Head of Marketing	
1 Audience authenticity	PASS	Estimated genuine audience above the 80% screen; no unexplained spikes.
2 Sentiment & controversy	PASS	No open disputes found in the 3-year scan.
3 FTC disclosure	PASS	Last 10 sponsored posts carry in-video and caption disclosure.
4 Exclusivity	FAIL	Competitor skincare post 18 days ago, inside a 60-day lock-out window.
5 Delivery record	PASS	Verified on-time delivery above the 90% screen.
6 Saturation	PASS	20% sponsored in the last 30 posts.
7 Usage rights	PASS	90-day paid usage and Spark Ads authorization specified.
8 Escrow / milestones	PASS	50% on draft approval, 50% on live link, held in escrow.

SCREENING RATING: MODERATE (7 OF 8)

Decision: approved with conditions. Written confirmation that the competitor agreement has lapsed or is waived, and the lock-out date added to the contract, before funds are released.

Sign-off: name, title and date recorded in the approval trail.

In Kitscore this memo is generated from a verified evaluation and the approval is logged in a timestamped audit trail. Live sample: kitscore.co/sample-sponsor-decision-memo

RUN THIS AUDIT IN KITSCORE

The checklist tells you what to inspect. The hard part is gathering the evidence and keeping the record. Here is how Kitscore covers each check today.

1 Audience authenticity	Trust Score with an audience-authenticity component and a Confidence Rating showing how much evidence backs it.
2 Sentiment & controversy	8-point brand safety assessment covering controversy and misinformation history, with source labels (self-reported, evidence-submitted, live-verified).
3 FTC disclosure	FTC disclosure compliance is part of the brand safety assessment on every evaluation.
4 Exclusivity	Exclusivity Conflict Engine (Team plan) scans a creator's other sponsors for a plausible conflict before you draft the deal.
5 Delivery record	Verified campaign history confirmed by both creator and sponsor: completion rate, ratings, outcomes.
6 Saturation	Still a manual check today. Use the 30-post method in the checklist.
7 Usage rights	Contract Intelligence (Team plan) reads signed contracts for payment terms, usage rights and renewal dates, with a 30-day renewal alert.
8 Escrow	Kitscore Escrow: funds held until the deliverable is submitted and approved.
Decision trail	Sponsor Decision Memo PDF with verdict, risk and recommended conditions; approval workflow and exportable audit trail on Team.

CHOOSE YOUR NEXT STEP

SPONSOR & BRAND TEAMS

Standardise vetting across every campaign

One evaluation is \$29, no subscription. Team is \$299 a month with a 14-day free trial: shared workspace, approvals, contract and exclusivity tools, audit trail.

[Start your Team trial](#) → kitscore.co/sponsors

AGENCIES & TALENT MANAGERS

Protect your roster before the brand does

Pitch for creators, review every contract and clause, track escrow and catch exclusivity conflicts across your whole roster in one workspace.

[Start a manager workspace](#) → kitscore.co/for-managers

Questions or a security review? hello@kitscore.co

REFERENCES & EVIDENCE NOTES

Sources checked October 6, 2026. They support the legal and platform guidance and the cited statistics, not the proposed numerical screening thresholds.

- 1 FTC: The FTC's Endorsement Guides: What People Are Asking**
Explains clear, conspicuous and format-appropriate disclosures; platform tools alone are not necessarily sufficient.
<https://www.ftc.gov/business-guidance/resources/ftcs-endorsement-guides-what-people-are-asking>
- 2 16 CFR Part 255: Endorsement Guides**
See §§255.0(f), 255.1(d) and 255.5 on disclosure, advertiser oversight and material connections. Interpretive guides, not a standalone civil-penalty rule.
<https://www.ecfr.gov/current/title-16/chapter-I/subchapter-B/part-255>
- 3 16 CFR §1.98: 2026 annual CFR compilation**
Lists \$53,088 under FTC Act §§5(l), 5(m)(1)(A) and 5(m)(1)(B), effective for assessments after January 17, 2025. Penalty amounts are adjusted periodically; recheck before legal reliance.
<https://www.govinfo.gov/content/pkg/CFR-2026-title16-vol1/pdf/CFR-2026-title16-vol1-sec1-98.pdf>
- 4 FTC: Penalty Offenses Concerning Endorsements**
Explains §5(m)(1)(B) and actual knowledge of previously determined unlawful conduct.
<https://www.ftc.gov/enforcement/notices-penalty-offenses/penalty-offenses-concerning-endorsements>
- 5 TikTok for Business: About Spark Ads**
Updated June 2026. Creator posts require authorization; align platform authorization with contractual paid-use permissions.
<https://ads.tiktok.com/resources/help/article/spark-ads>
- 6 SociaVault Labs: 2026 State of Influencer Fraud**
Published March 2026; 100,000 accounts, public data collected February 10–16. Vendor research, not independently validated here; English-focused; estimated 8–12% false positives.
<https://sociavault.com/labs/reports/fake-follower-study-2026>
- 7 EMARKETER: FAQ: Creator Vetting for Brand Safety**
September 19, 2025. Summary of a Viral Nation-partnered survey of 117 US marketers. Not a population-wide estimate.
<https://www.emarketer.com/content/faq--importance-of-creator-vetting-brand-safety>

IMPORTANT NOTICE

This guide is general information, not legal advice. Thresholds, review windows, scoring and escrow structures are proposed internal controls, not legal requirements or guarantees of campaign results. Kitscore scores and reports are decision support and do not replace your own due diligence or legal review.