

This new government must recognise and act on a critical fact of elected political life: its members will not be trusted until they have addressed how they communicate to each other, to the media and to the electorate. There is deeply embedded a solid barrier of distrust between Westminster and its constituency; it is solely Westminster's responsibility that it exists and to dismantle it. Part of the creation of that barrier, and a much more important part than politicians understand, are the deliberate untruths and manipulations that is election advertising, free from any meaningful regulation, any kind of integrity and any hope of connecting with voters. If change is to mean anything, it is that you tell us the truth, wherever you tell it.

Reform Political Advertising
July 6, 2024

A review of political party advertising for the
2024 General Election

1. Introduction

This is our fourth review of election advertising since we were founded some five years ago. We very much hope it will be our last and no doubt any readers will feel the same way. This can be a depressing trudge through the deceptions that our political leaders press upon us, or permit to be pressed upon us.

We should, however, briefly let you know who we are, why we set up and what we're trying to do. [Reform Political Advertising](#) was founded by Alex Tait and Benedict Pringle, both of whom held and continue to hold positions of responsibility in the advertising industry, simply because they got fed up with seeing obvious (to them) deceptions in electoral advertising and discovering that there was no regulation of those ads bar some ID requirements (which, just by the way, are also inadequate).

It is probably well understood that commercial advertising in the UK is regulated by the Advertising Standards Authority, arguably the most respected advertising regulator in the world. Their rules are comprehensive and their council's decisions have severe consequences. It seems somewhat beyond strange that an ad for, say, washing powder, is subject to some four sets of regulations while an ad for your vote has absolutely zero requirement from any authority to be accurate.

So the goal is that limited regulation of electoral advertising happens in the next period of parliament. By 'limited' we mean that regulation would be confined to misleading statements and data. Political opinion, policy statements and the like are of course off limits. It was this form of regulation that was recommended by a House of Lords committee in June 2020 and [rejected by the government](#) largely on the grounds that such regulation would have 'a chilling effect on freedom of speech,' when the recommendation had made very clear that only 'fundamental inaccuracy' should be restricted.

2. Progress

"The activist is not the man who says the river is dirty. The activist is the man who cleans up the river." Ross Perot

We are a small organisation, non-profit and politically neutral. There are only some three of us who give of their time on an irregular basis. We all have 'proper jobs' as well as attempting to overturn this obvious injustice. We can make only a limited amount of noise on the issue, garner as a result a limited amount of attention and achieve only limited access to those who might be able to make a difference.

As it is clearly not enough to shake a few trees and very few of them in important places in Westminster, we have acted on another aspect of the government's defence against the House of Lords recommendation and a point that we hear from a number of sources: that

regulation simply couldn't be done in the febrile atmosphere, curtailed timespan and massive activity of a General Election.

We first wrote a simple advertising code, written from the perspective of those who might sign it:

In our advertising we will:

- Make every effort not to mislead voters
- Ensure that factual claims are accurate
- Hold relevant, reliable evidence for claims
- Acknowledge a mistake & issue correction
- Inform audiences when using generative AI

The code was endorsed by six candidates in the London mayoral elections of May 2024, including incumbent Sadiq Khan. Subsequently, Manchester mayor Andy Burnham signed the code, and it was also endorsed by Neil (Lord) Kinnock.



We contacted a number of senior people from inside and outside the advertising industry and asked them to join 'EARP', the Election Advertising Review Panel, in order to review General Election ads submitted by volunteers and supporters.

David Puttnam (Chairman)



Chris Morris, Chief Executive Officer, Full Fact



Marina Purkiss, Political Commentator & Podcaster.



Harriet Kingaby, Co-Founder, Conscious Advertising Network



Poppy Wood Managing Director, Reset



Richard Lindsay, Director of Legal & Public Affairs, IPA



Gemma Charles, Deputy Editor, Campaign.



3. The process: doveryay, no proveryay (Russian proverb)

We have never pretended that these reviews are anything other than scratching the surface of the (very deep) store of election advertising. This is not a quantitative study, but it is, we hope, a carefully managed, politically impartial process that brings together people who know advertising's nuances and nonsenses, its regulatory wrinkles and its potential impact, whether accurate or otherwise. Guidance to members of the panel was:

- A. Leave your 'party hat', whatever it may be, at the door;
- B. See the ad through the eyes of the average reasonable voter; not particularly politically active or engaged, but the great majority of them obviously interested in the outcome. The electorate is quite volatile and as many as 40% will switch their vote versus last time (possibly more this time round). The majority of voters don't change their mind during the campaign, but there is a substantial minority that do;
- C. While our draft ad code is formally the 'rules' by which the ad should be judged, we have for a long time prior to publishing taken our cue from the [CAP Code Section 3](#). See especially 3.3 and 3.9;
- D. We prefer a unanimous vote, but will take a 5-2 or equivalent, unless the Chairman overrules;
- E. Reply to our mail within 24 hours as to whether you believe selected and researched ads are misleading/ factually incorrect and why. Do not 'reply to all' as that may prejudice others.

Ads came from a number of sources:

- Five volunteers (all engaged in this process gave of their time for free) sourced & reviewed advertising traced largely on the Meta ad library. They were:

[Simon Short](#)

(Team leader and co-ordinator)

[Rosie Reed](#)

[Brandon Williams](#)

[Natascha Imaan Ali](#) and

[Sam Jones](#)

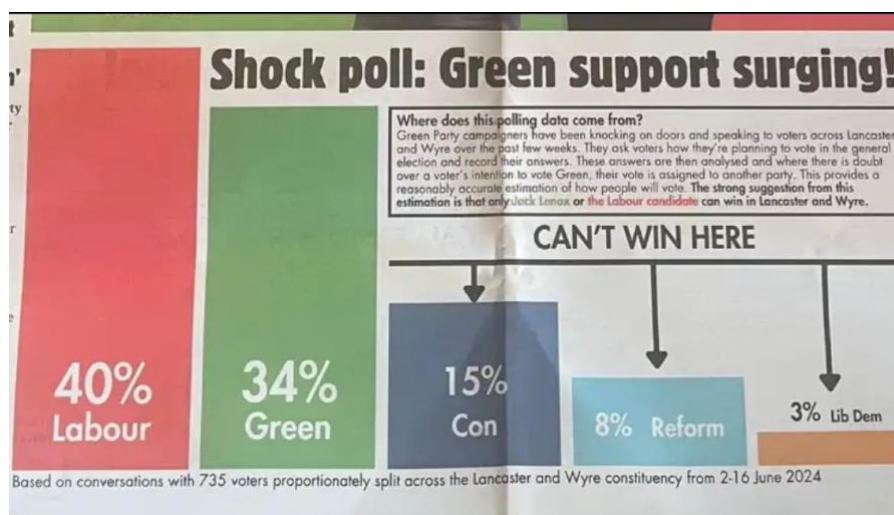
We take this opportunity to thank them all for what can be not necessarily the most exciting work in the world, but hopefully rewarding when we meet our goal.

- The process of ‘review’ is essentially source and fact-checking. In other words, verifying or otherwise the data shown in the ad, contacting the parties concerned (polling companies etc.) for further checking and where possible connecting with the advertisers for any comment or perspective they may wish to bring. We also drew on the extraordinarily valuable work done by our friends at Full Fact.
- Supporters, friends and connections send us ads they believe to be, to use a technical regulatory term, dodgy. Those ads are then confirmed to have run and are subject to the same review process outlined above.
- We are on the mailing lists of all the political parties and have a small network of ‘insider’ connections.

4. The advertising reviewed by EARP

“Politics have no relationship to morals.” Niccola Machiavelli

4.1. The Green Party in Lancaster and Wyre




- The above is a Green Party door-drop leaflet in the Lancaster & Wyre constituency sent to us by a supporter. The bar chart indicates Greens close to Labour in voting intent. The boxed and baseline text explains that the data is ‘based on conversations with 735 voters.’ It’s a reasonable assumption that Green Party campaigners are not trained interviewers/researchers, that any question may have been differently asked by campaigners, that the sample was not representative. (With thanks to Andy Smith from Insight Advantage for guidance on what constitutes proper research).
- We compared YouGov (MRP June 11-18) polling with the Green Party’s ‘polling’ (second draft of this paper shows the result):

	Green Party 'poll'	YouGov	Result
Labour Party	40%	50.5%	44.9%
Green Party	34%	7.9%	12.2%
Conservative Party	15%	21.8%	23.4%
Reform Party	8%	16.6%	16.0%
Lib Dem	3%	3.2%	3.6%

- The panel concluded unanimously that this leaflet/ advertising is misleading. As someone once said, you can either be a pollster or a politician, but not both.
- We speculate that polling or voting manipulation is a bad habit learned from the Lib Dems, who have established, if you will, the low bar in this technique. It's disappointing to see bar chart contagion, especially from the Green Party, who are signatories to our code.
- It is the inevitable result, though, in an unregulated and unsophisticated (in advertising terms) market. Parties, or elements of them, feel obliged to play the opposition at their own game, or get their retaliation in first. 'Dodgy bar charts' in this election have now become sauce for both goose and gander.


4.2. The Reform Party nationally

 **Reform UK**
Sponsored · Paid for by Reform UK

Our future is at stake with 14 million new arrivals in 12 years.

It's time to take back control of our borders. It's time to freeze immigration.

#BritainNeedsReform



REFORMPARTY.UK
Reform UK
Reform UK national political party offering common sense policies on immigration, the cost of living, energy & national sovereignty. Accountability for those holding public office. If you want Reform, vote Reform UK

[Sign up](#)

- The above is an ad on Facebook from the Reform official account and includes claims that 14 million immigrants will arrive in the UK within the next 12 years, according to official ONS projections.


- This claim is false as it misrepresents the ONS data, which project a total of 13.7 million arrivals *over 15 years from mid-2021 to mid-2036*. This period obviously includes past time and covers 15 years, not 12. ONS data indicates that the figure for the period referenced would be 10.4 million. Source [here](#). Reform is only about 40% out, basically a rounding error, no?
- The result of this effort is to misinform and mislead the great majority of those who saw it. In a way, this is the worst kind of deception: the numbers are there for anyone putting the ad together to see. They no doubt do, but they choose to invent some anyway, because they can. Unlike political debate or House of Commons exchanges, where forgetting or misquoting numbers can be understood if not necessarily forgiven, this is a ‘known untruth’ or a calculated piece of chicanery or, as voters like to put it – a lie.
- The Panel unanimously concluded that the Reform ad is misleading. There must be some irony, even greater disappointment, and a massive missed opportunity when a ‘reforming party’ delivers similar fare to those it seeks to depose.

4.3. The Conservative Party

ADVERTISER
Conservative and Unionist Party Report this ad

First shown: May 29, 2024 Ran for: 14 days, nonconsecutively

Last shown: Jun 15, 2024 Format: Image



- The ‘small boats’ claim does not reference a period of time/ data point; the claim ‘down 36%’ is accurate for the full year 2022/23; so far in 2024, small boat arrivals are up 48% compared with the same period last year ([Full Fact June 15, 2024](#)). Such claims from a commercial advertiser would require the data points to be referenced; the majority of the panel concluded that the claim is misleading.
- ‘NHS waiting lists falling monthly’ is incorrect according to the latest data. At the end of April, there were 7.6m cases on the main waiting list in England (the one normally quoted in these figures) compared to 7.5m cases at the end of March. Full Fact [here](#)
- Several members of the panel also pointed out that the Labour Party manifesto might reasonably be considered by most to be ‘a plan.’



- The above is one of a rather bizarre series of ads in an ‘Alert’ series, using an ‘emergency warning’ technique, which several members of the panel questioned as socially irresponsible, albeit outside our scope. Other examples related to ULEZ expansion and the green belt, which is apparently to be ‘flattened’ by the Labour Party. The ad above can be found [here](#).
- Angela Rayner has previously voted against the renewal of nuclear trident. Rayner also stated in the 2019 General Election that "I want a world without nuclear weapons and that’s what I want a Labour government to work towards".
- During the 2024 campaign, Rayner tweeted support for the ‘triple-lock’ that Labour proposed for the keeping of nuclear trident and maintaining nuclear weapons, stating in a BBC election debate "We will keep our nuclear deterrent and we will invest in it into the future". A similar pledge is also in the Labour Party manifesto.
- The Panel by majority concluded on the above grounds that the advertising is misleading in regard to Rayner’s position on the nuclear deterrent. A member of the panel also pointed out that targeting, according to the ad library data, was skewed towards men. The matter is again outside our scope, but not without relevance to a broader debate about some of the issues faced by female politicians.

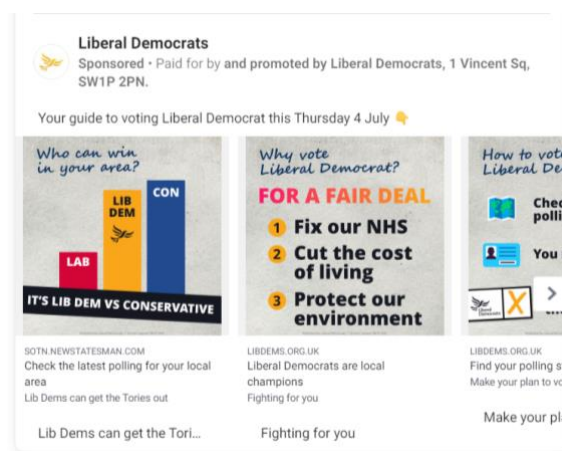


- The above was tweeted (tweets are within remit, incidentally, just as they are under the CAP Code scope for commercial advertisers) from the Conservative official account.
- The ‘letter’ (we could not establish whether it was actually sent) claimed that Labour’s measures ‘would add up to cost businesses £1,250 directly per employee per year.’

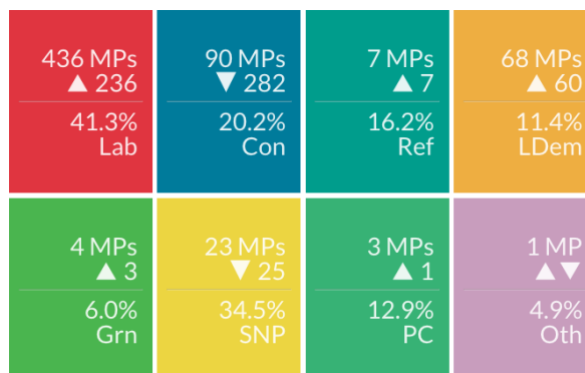
Rationale for the figure, such as it is, provided in a press article [here](#). The Labour Party, for the record, dispute the claim.

- The issue raised by the review team is the use of gov.uk/ HMRC styles to impersonate an official communication. Both e.g. use arial font for text, the same logo ‘structure’ with Helvetica Neue 55 Roman and redolent green highlighting. Government design guidelines are [here](#) and the HMRC home page is [here](#).
- The Panel was unimpressed but also on balance unconvinced that the communication amounted to misleadingness, but ‘closer to the line of parody for political advertising,’ unless it could be established that the £1,250 number was itself clearly erroneous.

4.4. The Liberal Democrats



- The above is taken from a Lib Dem ad that ran, albeit to limited spend, on Facebook and Instagram. There is no data supporting the bar chart, which indicates Conservatives in first place, LDs close second, Labour a distant third. Make of that what you will.
- These ads were run with a very low spend; location provided by the ad library simply ‘England’. It may be that the ad was targeted to seats that show the kind of party share indicated.
- Clicking on the link (to the New Statesman’s State of the Nation) provided below the ad image actually reveals a more familiar picture:



- Additionally, separate national polling data checked at the time of the review showed the Liberal Democrats at 13%.
- The panel unanimously concluded that this advertising is misleading, providing no substantiation for what anyway appears to be an unlikely position for the parties depicted and no transparency about the data source.



- The above is a Scottish Lib Dems Gordon & Buchan constituency ad running on Facebook & Instagram. The bar chart (sigh) in the ad has two data sources. The first 'base' source is the result of the 2019 General Election in Gordon (*importantly, there have been boundary changes since, to create Gordon and Buchan*) and then applied to that base is the poll projection from More in Common (MiC), e.g. Lib Dems' share of vote was 10.6% and poll projection at 3rd June is 22%, thus 'UP 11%'.

(We should note that this is an [MRP poll](#), which uses data from voting intention to model how people will vote based on their demographics, voting behaviour and constituency information. These results are then applied to the demographic and electoral make-up of constituencies to arrive at a constituency-level prediction). The research team were in touch with the candidate and polling company to verify the numbers, which are correctly set out in the ad.

- Two issues, however: 1) The Labour party is not included in the chart and has a similar increase versus 2019 (share 5.5% and projection 16%). Candidate/ party might argue that the LP is a small party in this context, but the case that's being made is that of momentum. 2) Similarly, the claim 'and rising' and - with regard to other parties - 'and falling', is not borne out by a subsequent MiC MRP poll of June 19th showing Lib Dems at 13%, Conservatives at 36%, SNP 27%. The ad was run on July 1st.
- The panel by majority concluded that this advertising is misleading. (The result in Gordon and Buchan was a 16.7% share for the Lib Dems.)
- There is a special place in heaven reserved for the person who can convince the Lib Dems to consign misleading bar charts to the bin of history. Now, about their 'stunts'....

5. Other advertising reviewed by RPA outside the EARP process

5.1. The Conservative Party



When reviewing this claim in the form that we saw it (on Tik Tok [here](#)), we observed:

- The advertising sets out the process by which the figure of £2k was reached and which of and what proportion of the separate elements that made up the figure were Treasury sourced or otherwise (this issue had been the subject of controversy in earlier non-advertising iterations of the claim);
- The central claim is that 'Labour's tax rises will cost every working family £2,094'. Critically, the voiceover states that the cost is 'over the next four years.' The video goes on to explain that calculations are based on '27 Labour commitments' made by senior figures and in Labour documents and 'overwhelmingly based on official treasury figures;'
- The video identifies a 'funding gap' of £38.5bn, i.e. that between the spending plans and stated funding, again 'over the next four years.' The calculation of £2,094 is reached by dividing the number of working households into the funding gap;
- We did not examine each of the individual commitments or the basis on which those commitments had been translated into hard cash. We're more concerned with the 'final' headline claim of £2,094.

We concluded:

- The advertising is misleading, not necessarily in the matter of the claim itself (though that has been criticised, notably by Full Fact, for some questionable assumptions and for an earlier iteration with reference to treasury involvement) but in the way that it is made.
- The £2,094 figure is not sufficiently clearly explained as being a total that is *spread over* four years. The expression that was used - 'over the next four years' - could be

taken to mean that the £2k figure applies in each of those years, so we are deeply suspicious of this term and its potential for deceit as it contributes to the notion, which most would assume, and as concluded by the UKSA, that the £2k figure is an annual cost.

The green belt might be tightened, but it won't be flattened.



- The ad above is one of a series in the Conservative party's 'Alert' campaign that ran on Facebook. EARP reviewed another of the executions (see above). Let's put to one side the questionable ethic of using such a device to bring attention to a party-political issue (though one could of course argue that election advertising is a national emergency) and examine the substance of the ad, such as it is.
- The ad states 'Labour will flatten the green belt'. This claim was also seen on Rishi Sunak's X account, which included a cropped image of a Politico article quoting a Labour Party official thus: "I don't care if we flatten the whole green belt, we just need more houses in this country". The Labour Party official is unnamed. Could be Godot, or Harvey.
- Keri Starmer denied the claim. Labour [in their manifesto](#) state: *Labour is committed to preserving the green belt which has served England's towns and cities well over many decades..... Without changing its purpose or general extent, Labour will take a more strategic approach to greenbelt land designation and release to build more homes in the right places.*
- It may be something of a moot point that the ad is misleading; this kind of advertising can be considered to be permissible exaggeration or 'puffery' in the context of an election campaign. After all, if a senior Conservative figure was to say in a speech that 'Labour will flatten the green belt', then most of us would not take it literally, of course – just another bit of political flim-flam. However, this isn't a speech, it's a paid ad and it uses a device that appears to be intended to scare the living daylights out of those who might have a bit of green belt somewhere in the neighbourhood. We concluded the ad is misleading.

The Conservative Party's identity crisis



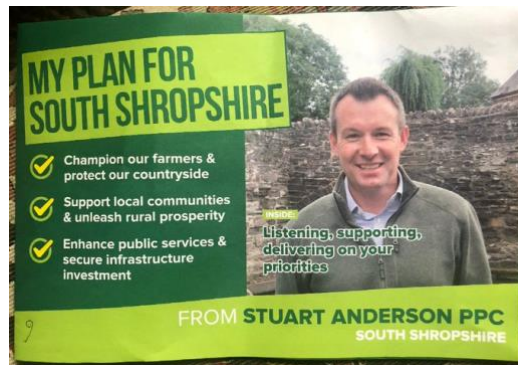
- The much-criticised CCHQ account re-brand to Fact Check UK in the 2019 election campaign has re-raised its ugly head in the form of its bastard child Tax Check UK. Full Fact stated: 'We've written to @Conservatives to ask them to remove the 'Tax Check UK' rebrand of @CCHQPress. This misrepresents posts on the account as an impartial fact checking service. Voters deserve better.'
- At the time of Fact Check UK, Twitter stated: *"Twitter is committed to facilitating healthy debate throughout the UK general election. We have global rules in place that prohibit behaviour that can mislead people, including those with verified accounts. Any further attempts to mislead people by editing verified profile information - in a manner seen during the UK election debate - will result in decisive corrective action"*. Well, they sure delivered on that one.
- Tax Check UK is one example of several instances where the Conservatives have either masqueraded as another entity:



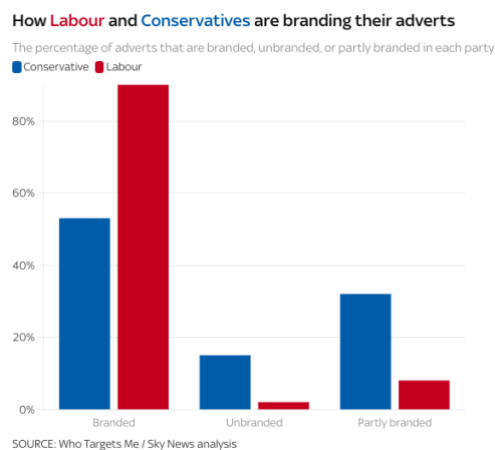
or provided no identity (Image from Daily Mirror online)



or suggested they were someone else:



- Our thanks to Sky News and Who Targets me, who even quantified the issue:

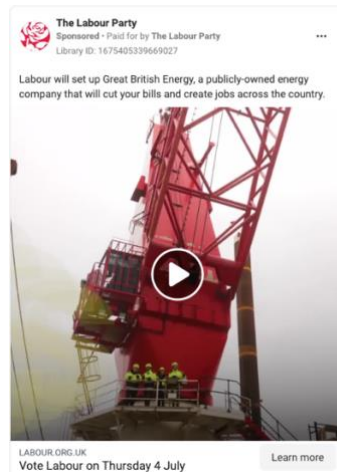


- *'We looked at the adverts published on Facebook and Instagram by 521 Labour and Conservative candidates from 1 May until 12 June. Of these, 376 adverts contained official branding (logos and colours), 104 had some form of partial branding, and 41*

had no branding at all. And the vast majority of those with no branding - 38 - were Conservative.'

- Advertising, especially 'corporate' advertising, reflects that corporation's culture. Nothing better encapsulates the Conservative Party's disarray than its incoherent and unreliable presentation in advertising.

5.2. The Labour Party



- The ad can be found [here](#). In it, Ed Miliband tells us the party's energy plans will save "£300 off your bills". Full Fact [state](#) *'this figure is... from a report which estimated an average household electricity bill would be around £300 lower in 2030 than in July-October 2023 if the UK met its decarbonisation commitments. These plans are different to Labour's and the price cap has decreased since the analysis was done.'* (meaning the saving would be less)
- Oh, just sling a figure in. Any figure. Nobody who matters cares.

6. Conclusions and a flicker of light at the end of a very long and very dark tunnel

- First, we suggest that this EARP exercise, together with our earlier pilot for the 2022 local elections, confirms that it is entirely feasible to conduct a regulatory check on election advertising, contrary to opinions expressed by some parties and the government (of the time) especially.
- Clearly, 'EARP' is run on a (somewhat frayed) shoestring and only happens because of the goodness of the hearts and the public service attitude of the eminent panel members. 'Real' regulation must be fully funded and involve established authorities such as those recommended by the House of Lords committee in June 2020.
- We suggest that there is an opportunity to deploy AI in such a process (the ASA has made significant progress in AI-assisted regulation), so that ads can be processed almost instantaneously and their appearance, if they obviously transgress, curtailed as appropriate.
- All of the above, together with all of our work over the past five years, clearly demonstrates a major problem with the integrity of electoral communications in the U.K. We are not exactly alone in that view: some 60% of voters mistrust ads from

political parties and 76% think that those ads should be regulated for factual accuracy, while just 4% disagree (Opinium June 2024).

- And the good news from that study? If election advertising was to be regulated by 'an authority such as the ASA', some 56% of voters would regard that advertising as much or somewhat more trustworthy.
- Political parties have become mired in a grim and dirty communications battle from which there appears to be no escape. Inaccuracy begets distortion begets misleadingness - fire must be met with fire - and the electorate, the democratic process, trust in political leaders and politics, are all damaged time and again to a point now so low that we cannot sink further. We write as professional communicators: we know we have reached the nadir in political communications.
- The outgoing government did much to bring about this unhappy, this miserable state of affairs, as can be seen from the above, but others, including those from our new government and other parties, have played their shabby part. It is as if politicians fail entirely to understand advertising's impact or to care about its content - at the time of 'Fact Check UK', Dominic Raab was [quoted](#): 'No-one gives a toss about social media cut and thrust.' No-one but the electorate, it would seem.



- On 2nd July 2024, the Welsh government [announced](#) that legislation designed to make lying in politics illegal will be brought in before the next Senedd elections in 2026. This somewhat encouraging development has been brought about by the persistence and determination of Liz Saville Roberts, who served as the group leader of Plaid Cymru in the House of Commons. LSR's speech in the House on Honesty in Politics from October 2023, which references advertising, is [here](#), and from PMQs February 28th, 2024 [here](#) (at 15.10). The request that 'egregious campaigning tactics are renounced' was greeted with laughter. There's the nub: that's politics and it will never change. Egregious is what we do.
- While politically neutral, we welcome this new government, in fact any new government, but in particular one that campaigned on a single word: change. Our request is that that concept extends to political communications generally and election advertising specifically. Until that happens, nothing will really change because, after the honeymoon period, we will be obliged to settle back in to believing nothing they say. Unless they really do change and start telling us the truth everywhere they tell it.

RPA July 6, 2024