

## **Full Fact evidence to the House of Commons Public Bill Committee on the Representation of the People Bill:**

### **An opportunity to safeguard democracy against misinformation and disinformation, strengthen the integrity of elections and restore public trust in politics**

Misinformation and disinformation are serious and growing threats to democracy, but the UK's laws are not fit for purpose in tackling the harms. The government had recognised the threat. However, the Representation of the People Bill, as introduced, does little to address it and risks being a missed opportunity.

This evidence is provided for the Public Bill Committee on the Representation of the People Bill. It sets out how the Bill could strengthen the foundations of UK democracy, tackle misinformation and disinformation in elections, and help to restore trust in politics.

### **Misinformation and disinformation are severe risks to UK democracy**

In 2024, both the World Economic Forum<sup>1</sup> and the United Nations<sup>2</sup> identified misinformation and disinformation as the most severe global risks. The Organisation for Economic Cooperation and Development described them as "some of the biggest threats to democracy in the 21st century."<sup>3</sup>

Concerns have been raised in recent years by Parliament, the Electoral Commission, civil society<sup>4</sup> and academia<sup>5</sup> about the vulnerability of UK democratic processes to misinformation and disinformation.

- The Joint Committee on the National Security Strategy (JCNSS) flagged the risk of hostile actors using deepfakes, fuelling conspiracies, sowing division and undermining trust in UK leaders and institutions.<sup>6</sup>
- The Science, Innovation and Technology Committee's inquiry on misinformation shone a light on how platforms' systems can proliferate the spread of false information, and the limits of the law.<sup>7</sup>
- The Electoral Commission has highlighted how algorithms can promote and rapidly amplify misleading content, which risks undermining democratic participation and confidence in the democratic process.<sup>8</sup>
- The Speaker's Conference on the security of MPs, candidates and elections called for the government to review electoral law to address disinformation that can fuel abuse and intimidation.<sup>9</sup>
- The Public Administration and Constitutional Affairs Committee highlighted that electoral law and policy "has struggled to keep pace" with the rise of misinformation and disinformation.<sup>10</sup>

There is also significant public concern. An Electoral Commission survey in 2024 found that misinformation and disinformation are the second biggest concern in elections (70%) after media bias (74%).<sup>11</sup> In the same year, Ofcom found that 60% of people saw false or misleading material about the election at least once in the previous week. 56% expressed concern about the impact of deepfakes on the election – but almost half (46%) were not sure if they had seen one.<sup>12</sup> The growing volume of misinformation, and difficulty identifying AI-generated false content, make it increasingly hard to know where to turn for trusted information.<sup>13</sup>

<sup>1</sup> World Economic Forum (January 2025) [The Global Risks Report 2025](#)

<sup>2</sup> United Nations (2024) [Global Risks Report 2024](#)

<sup>3</sup> Julio Terracino, OECD (November 2022) [Strengthening democracy: Gearing up governments to tackle mis- and disinformation](#)

<sup>4</sup> Full Fact (May 2025) [Full Fact Report 2025](#)

<sup>5</sup> Dr Hugo Drochon, Dr Dan Lomas, Prof Rory Cormac (March 2024) [Evidence to the JCNSS inquiry on Defending Democracy](#)

<sup>6</sup> Joint Committee on the National Security Strategy (23 May 2024) [Letter to the Prime Minister Rt Hon Rishi Sunak MP](#)

<sup>7</sup> Science, Innovation and Technology (7 July 2025) [Report on social media, misinformation and harmful algorithms](#)

<sup>8</sup> Electoral Commission (28 January 2025) [Response to the SIT Committee call for evidence on social media, misinformation and harmful algorithms](#)

<sup>9</sup> Speaker's Conference (2 June 2025) [First report](#)

<sup>10</sup> Public Administration and Constitutional Affairs Committee (22 July 2025) [Review of the 2024 general election](#)

<sup>11</sup> Electoral Commission (7 May 2024) [Public Attitudes Survey 2024](#)

<sup>12</sup> Ofcom (10 September 2024) [UK General Election news and opinion formation survey 2024](#)

<sup>13</sup> World Economic Forum (January 2025) [The Global Risks Report 2025](#)

There is a corresponding crisis of trust in our political system and politicians.<sup>14</sup> This undermines the government's ability to deliver its mandate with legitimacy. As Labour's 2024 manifesto highlighted, the deterioration of trust has led to "a crisis of confidence in our political system's ability to deliver any change."<sup>15</sup>

With the lowering of the voting age, and younger people reporting very high levels of dissatisfaction with UK democracy,<sup>16</sup> there has never been a more critical time for the government to tackle the problem.

## The current legislative framework does not tackle the risks

Despite misinformation being the most encountered type of harm online,<sup>17</sup> repeated warnings from experts about the risks of disinformation from hostile actors, and the growing crisis of public trust, the UK's laws provide limited protection against the harms of misinformation and disinformation to democracy.

- In March 2021, the then Prime Minister said the Online Safety Act (OSA) would tackle collective online harms, including threats to democracy.<sup>18</sup> The previous government noted "that misinformation and disinformation surrounding elections are a risk to democracy and it is vital to address this issue."<sup>19</sup> But the OSA failed to address the harm misinformation and disinformation can cause to democracy.<sup>20</sup>
- The National Security Act 2023 included a new 'foreign interference' offence but there are practical challenges to proving the offence, including the difficulty attributing interference to a foreign power which may have concealed its involvement,<sup>21</sup> and the law did not combat domestic political deepfakes.<sup>22</sup>
- The Elections Act 2022 did not tackle misinformation and disinformation in politics or address the harms they cause to democracy, and amendments relating to disinformation were rejected.<sup>23</sup>

An Electoral Commission survey in 2024 found that three quarters (76%) of people do not think enough is being done to tackle misinformation and disinformation in elections, and only 5% think sufficient action is being taken.<sup>24</sup> A robust framework is needed to tackle the issue and to reassure the public.

## The government has recognised the need to act

The government's policy paper, *Restoring trust in our democracy: Our strategy for modern and secure elections*, published in July 2025, recognised that "Our own democracy is being threatened by misinformation" and committed to restoring trust in politics. It emphasised that "We must act now to secure our democracy".<sup>25</sup>

Days later, Sir Keir Starmer told a Parliamentary committee that he was "very worried at the last election about misinformation, and I am very worried about the potential for misinformation in future elections in this country".<sup>26</sup>

On 5 March 2026, the government's response to the Speaker's Conference reports was published. The government recognised the need to keep pace with evolving threats, including to UK democracy, and said it would support Ofcom to review the existing framework and develop codes as harms continue to evolve, in order to strengthen the Online Safety Act.

The government also recognised issues with the offence of false statements (see further below) and committed to "action to clarify the scope of Section 106, particularly to ensure that it captures emerging technologies." The government also said it "shares the conference's concern about the impact of mis- and disinformation, including the role of deepfakes, on candidates, MPs, and UK elections and is committed to addressing it."

<sup>14</sup> Ipsos (14 December 2023) [Trust in politicians reaches its lowest score in 40 years](#)

<sup>15</sup> Labour Party (June 2024) [Manifesto](#)

<sup>16</sup> Royal Holloway (4 July 2024) [Nearly half of young people are unhappy with UK democracy](#); John Smith Centre (March 2025) [UK Youth Poll 2025](#)

<sup>17</sup> Ofcom (7 May 2025) [Adults' Media Use and Attitudes Report](#)

<sup>18</sup> Hansard (16 March 2021) [Integrated Review](#)

<sup>19</sup> HM Government (March 2022) [Government Response to the Report of the Joint Committee on the Draft Online Safety Bill](#)

<sup>20</sup> Full Fact (July 2025) [The Online Safety Act and Misinformation: What you need to know](#)

<sup>21</sup> Jonathan Hall KC (23 July 2024) [The Foreign Hand and Foreign Interference](#)

<sup>22</sup> Joint Committee on the National Security Strategy (23 May 2024) [Letter to the Prime Minister, Rt Hon Rishi Sunak MP](#)

<sup>23</sup> Hansard (28 March 2022) [Elections Bill](#); Hansard (25 April 2022) [Elections Bill](#)

<sup>24</sup> Electoral Commission (7 May 2024) [Public Attitudes Survey 2024](#)

<sup>25</sup> Ministry of Housing, Communities and Local Government (17 July 2025) [Restoring trust in our democracy: Our strategy for modern and secure elections](#)

<sup>26</sup> Liaison Committee (21 July 2025) [Oral evidence: Work of the Prime Minister](#)

It said it was “monitoring the implementation and impact of the false communications offence as part of ongoing work” and “carefully considering the need for any updates to existing electoral offences to explicitly capture deepfakes.”

During the first debate on the Representation of the People Bill, on 2 March 2026, multiple MPs on a cross-party basis highlighted the failure of the Bill to tackle misinformation and disinformation, and the need for measures in a range of related policy areas. This included:

- **Rushanara Ali** said that more needs to be done to deal with hostile actors “exploiting online platforms to flood the debate with disinformation and deepfakes”.
- **Justin Madders** said political debate has become “distorted by misinformation, with people no longer even able to agree on basic facts. This represents an existential threat to liberal democracy.”
- **Emily Darlington** argued for updates to electoral laws to cover digital behaviour, including disclosure and labelling of deepfakes, regulation and transparency around political advertising, and making electoral offences priority offences under the OSA.
- **Martin Wrigley** and **Alex Barros-Curtis** both spoke of the need to “deal with misinformation and disinformation”, while **Helen Maguire** said it is “imperative that we do not go into another election without robust, updated measures to tackle disinformation.” **Ellie Chowns** noted the “grave threat of disinformation”.
- **Zöe Franklin** said that “section 106 of the Representation of the People Act needs to be updated to explicitly criminalise the use of AI and deepfakes”, while **George Freeman** spoke being the “first parliamentary victim of an AI deepfake video attack” and gaps in the law allowing “serious disruption to our politics”.
- **James Cleverly** said the Conservatives would support “sensible, proportionate measures to ensure that AI-generated political material is clearly labelled and subject to transparency as a requirement.”
- **Valerie Vaz, Cat Smith** and **Lisa Smart** spoke about the need for political literacy to build young people’s confidence participating in elections within an information environment where disinformation exists.

In response, the Minister, Samantha Dixon, acknowledged that misinformation and disinformation had been raised by MPs - and noted that “There are already measures in the Online Safety Act that require the removal of illegal content, but this issue needs to be addressed more forcefully.”

### Misinformation is not meaningfully covered by under the OSA

The measures in the Online Safety Act only address misinformation coincidentally, when it also amounts to a relevant offence in the Act (for example, misinformation that also stirs up racial hatred) or where it intersects with certain harmful content to children. The government has previously set out the narrow scope of the OSA when it comes to addressing misinformation.<sup>27</sup>

As the Science, Innovation and Technology Committee concluded following its inquiry on social media, misinformation and harmful algorithms: “The Online Safety Act was not designed to tackle misinformation.”<sup>28</sup>

The principal measure for addressing electoral disinformation in the OSA is the inclusion, in the list of ‘priority offences’, of the offence of foreign interference. This falls significantly short of addressing the threat to UK democracy, given the challenges proving the offence, its narrow focus on foreign powers, and the harms that can result from misinformation and disinformation, both domestically and before illegality can be established.

On 5 March 2026, Meta told the Foreign Affairs Committee that only half of the coordinated inauthentic networks it removes are foreign influence operations (i.e, originating in one country and targeting another).<sup>29</sup> The OSA in its current form allows domestic disinformation to flourish. During the first debate on the

<sup>27</sup> DSIT (9 May 2025) [letter from Baroness Jones to the SIT Committee](#)

<sup>28</sup> Science, Innovation and Technology (7 July 2025) [Report on social media, misinformation and harmful algorithms](#)

<sup>29</sup> Foreign Affairs Committee (March 2026) [Oral evidence: Disinformation diplomacy](#)

Representation of the People Bill, Emily Thornberry also highlighted the phenomenon of domestic interference and emerging patterns of behaviour and undue influence within the UK.

On 15 September 2025, a Minister noted that the OSA includes election-related offences, such as the offence of false statements about candidates and undue influence relating to elections.<sup>30</sup> However, the 'safe harbour' clauses in the OSA mean platforms are only required to take preventative measures set out in Ofcom's Codes of Practice, and these offences are not in the priority list or in Ofcom's Illegal Content Judgments Guidance. They are also not subject to the additional duties platforms need to take in relation to priority offences.<sup>31</sup>

Harmful electoral misinformation needs to be addressed explicitly in the OSA itself. In practice this means adding key electoral offences to the OSA's priority list and into Ofcom's Codes, to ensure platforms are identifying and mitigating these real risks to democracy.

More substantially, the OSA needs to be upgraded so that the largest platforms and search engines are required to address negative effects that their services pose to electoral processes, and other systemic harms. These upgrades to the OSA are considered in more detail further below.

## The Bill does not protect our democracy

Despite the government's recognition that our democracy is being threatened by misinformation,<sup>32</sup> its policy paper included only limited proposals to address misinformation and disinformation in elections, and two of the key measures were not carried forward into the Bill as introduced:

- A new code of conduct to give the public “more confidence that campaigns are being conducted with honesty and integrity and are not intentionally attempting to mislead the public.”
- A requirement for campaign material promoted by or on behalf of political entities to include details of the affiliated party, to tackle the risk of material that is designed to mislead.

The policy paper highlighted the need to “guard newly enfranchised young people against the potential effects of online mis- and disinformation”. Recent research by Full Fact and Internet Matters underlines the urgency, with half of 13-17-year-olds confident they could distinguish true political information from false.<sup>33</sup>

The Bill contains no new measures to address this urgent challenge. As Shout Out UK and the All-Party Parliamentary Group on Political and Media Literacy highlighted, “the success of this franchise extension is inextricably linked to the robust implementation of Political and Media Literacy education.”<sup>34</sup>

The Bill falls significantly short of the challenge. Without clearer safeguards against misleading political content, more transparency over political campaigning, and stronger measures to support media and political literacy, it risks falling short of its stated aim of restoring trust and strengthening the integrity of UK democracy.

## Full Fact's recommendations for the Bill

Full Fact is calling for the Bill to include the following package of measures - and produced an accompanying series of briefings for Parliamentarians to inform debate on the Bill:

1. An upgraded Online Safety Act that safeguards the UK's democracy ([briefing](#)).
2. Stronger rules and regulations to deal with political deepfakes ([briefing](#)).
3. A comprehensive, centralised publicly accessible library of political adverts ([briefing](#)).

<sup>30</sup> DSIT (15 September 2025) [Letter from Kanishka Narayan to Sir Lindsay Hoyle](#)

<sup>31</sup> Online Safety Act Network (1 September 2025) [User-to-User Illegal Content Duties](#)

<sup>32</sup> Ministry of Housing, Communities and Local Government (17 July 2025) [Restoring trust in our democracy: Our strategy for modern and secure elections](#)

<sup>33</sup> Internet Matters and Full Fact (10 February 2026) [Preparing young people to vote in a complex, attention-driven information environment](#)

<sup>34</sup> APPG on Political and Media Literacy and Shout Out UK (17 July 2025) [Government reconfirms commitment to Votes at 16: A joint statement from the APPG on Political & Media Literacy and Shout Out UK](#)

4. A regulatory framework to prevent misinformation and disinformation in political adverts ([briefing](#)).
5. Transparent and accountable systems for dealing with electoral information incidents ([briefing](#)).
6. Increased investigative powers for the Electoral Commission ([briefing](#)).
7. A statutory duty for platforms to support effective media and political literacy ([briefing](#)).

Together, these reforms would modernise the UK’s electoral framework for the digital age – strengthening transparency, clarifying legal protections, empowering voters and ensuring robust, independent oversight.

## 1. An upgraded Online Safety Act that safeguards the UK’s democracy

The policy paper highlighted the need to “guard newly enfranchised young people against the potential effects of online mis- and disinformation” and noted that the OSA requires online companies to take action against illegal misinformation and disinformation. However, this is extremely limited: the Act does not cover most misinformation and disinformation. Nor does it address the broader collective harms that misleading political content can cause to electoral integrity.<sup>35</sup> As the Science, Innovation and Technology Committee concluded last year, the OSA “cannot keep the UK public safe as it was not designed to tackle misinformation.”<sup>36</sup>

In 2020, the Committee on Democracy and Digital Technology recommended that platforms’ duty of care should extend to actions which undermine democracy. This would have meant a duty of care that “extends to preventing generic harm to our democracy as well as against specific harm to an individual.”<sup>37</sup> Ultimately, as noted above, the OSA failed to cover this sort of harm and left the UK’s democracy exposed.<sup>38</sup>

In the EU, very large platforms and search engines are required to include “any actual or foreseeable negative effects on civic discourse and electoral processes, and public security” in risk assessments;<sup>39</sup> and to implement reasonable, proportionate and effective mitigation measures. Guidelines set out measures they could take to mitigate systemic risks to integrity of elections, like adapting their recommender systems.<sup>40</sup>

### Recommendation

The government should add the following electoral offences as priority offences under the OSA. This would require online companies to assess and mitigate the risk that there are used to commit these offences, report on their risk assessments, and take proportionate steps to reduce harm:<sup>41</sup>

- the offence of making or publishing a false statement of fact about a candidate before or during an election for the purpose of affecting their return (section 106 of the Representation of the People Act), to expressly include digitally manipulated and AI-generated content;<sup>42</sup> and
- the offence of undue influence, which includes forcing a person to vote in a particular way (section 114A of the RPA); as well as undue influence in Scottish Parliament and Senedd Cymru elections.

More broadly, the OSA should be updated to tackle collective harms to democracy. This would require the largest online companies to identify – and put in place reasonable, proportionate and effective measures to mitigate – any actual or foreseeable negative effects on civic discourse, electoral processes and public security that stem from their services. This should be underpinned by a code of practice.

<sup>35</sup> Full Fact (July 2025) [The Online Safety Act and Misinformation: What you need to know](#)

<sup>36</sup> Science, Innovation and Technology Committee (11 July 2025) [UK’s Online Safety regime unable to tackle the spread of misinformation and cannot keep users safe online, MPs warn](#)

<sup>37</sup> House of Lords Select Committee on Democracy and Digital Technologies (29 June 2020) [Digital Technology and the Resurrection of Trust](#)

<sup>38</sup> Full Fact (updated August 2025) [The Online Safety Act and Misinformation: What you need to know](#)

<sup>39</sup> Full Fact (February 2022) [Full Fact Report 2022](#)

<sup>40</sup> EU Commission (26 March 2024) [Commission publishes guidelines under the DSA for the mitigation of systemic risks online for elections](#)

<sup>41</sup> Ofcom (9 November 2023) [Quick guide to illegal content risk assessments](#)

<sup>42</sup> Electoral Commission (16 October 2024) [Guidance for Candidates and Agents at Combined Authority Mayoral elections](#)

Ofcom has the power to obtain information from online companies, including about how their algorithms operate.<sup>43</sup> The Bill should expand Schedule 8 of the OSA, to enable Ofcom to require those companies to provide information related to the additional priority offences and systemic risks.

## 2. Stronger rules and regulations to deal with political deepfakes

In a letter to the then Prime Minister in 2024, the JCNSS called for any future government to consider making it illegal to create a harmful political deepfake.<sup>44</sup> The OSA created new offences that prohibit sharing and threatening to share sexually explicit deepfakes, but it did not criminalise the creation of those images without consent, nor did it cover political deepfakes.<sup>45</sup> The Data (Use and Access) Act 2025 introduced a new offence which means that people can be charged for creating and sharing sexually explicit deepfakes.<sup>46</sup>

In April 2025, the Electoral Commission called for the offence of making or publishing a false statement of fact about a candidate to be updated, to expressly cover digitally manipulated false statements.<sup>47</sup> In May 2025, the Speaker's Conference recommended reviewing how to make the offence more enforceable and able to keep pace with technology, and to consider expanding it beyond personal character or conduct.<sup>48</sup> The Conference noted "that addressing disinformation is a necessary step for reducing abuse and intimidation against MPs and candidates, as many cases are triggered by disinformation about the victim."

Electoral Commission guidance in June 2024 called for generative AI material to be labelled.<sup>49</sup> In their January 2025 evidence to the SIT Committee's inquiry on misinformation, the Commission suggested that social media platforms should require labelling of AI-modified content during election periods.<sup>50</sup>

### Recommendation

The government should publish guidance clarifying whether key electoral offences – including false statements about candidates and undue influence – apply to AI-generated or digitally manipulated content. At present, it is unclear whether synthetic media that fabricates audio or video would fall within the scope of these offences.<sup>51</sup> If they are out of scope, the Bill should bring those offences up to date.

The Bill should require certain political campaigners to include a clear transparency marker – with the name of the promoter and the person and political party on whose behalf they are promoting – in any material where the voice or image of certain categories of political individuals has been manipulated, to expressly include deepfakes. Non-compliance should result in proportionate civil sanctions.

If the manipulated material constitutes a false statement of fact about a candidate's character or conduct, and was done for the purpose of affecting the return of a candidate at an election, it could also amount to a false statements offence (as updated or clarified by government guidance).

## 3. A comprehensive, centralised publicly accessible library of political adverts

The policy paper proposed extending the digital imprint rules (which make clear who is responsible for an advert) to help voters "better understand the origin and intent of the material they see..." Transparency about who is behind political content is necessary but not sufficient, and only part of the solution. Meaningful scrutiny requires visibility of what was shown, to whom, and at what cost.

<sup>43</sup> Ofcom (26 February 2025) [Online Safety Information Powers Guidance](#)

<sup>44</sup> Joint Committee on the National Security Strategy (23 May 2024) [Letter to the Prime Minister. Rt Hon Rishi Sunak MP](#)

<sup>45</sup> Queen Mary, University of London (24 January 2025) [Deepfakes and the Law: Why Britain needs stronger protections against technology-facilitated abuse](#)

<sup>46</sup> Ministry of Justice (22 January 2025) [Better protection for victims thanks to new law on sexually explicit deepfakes](#)

<sup>47</sup> Electoral Commission (14 April 2025) [Written evidence submitted to the Speaker's Conference](#)

<sup>48</sup> Speaker's Conference on the security of MPs, candidates and elections (23 May 2025) [First report](#)

<sup>49</sup> Electoral Commission (17 June 2024) [New advice for voters on disinformation, and for campaigners using generative AI](#)

<sup>50</sup> Electoral Commission (28 January 2025) [Response to the SIT Committee call for evidence on social media, misinformation and harmful algorithms](#)

<sup>51</sup> Epistemic Security Network (12 January 2026) [Epistemic Security Briefing: The Elections Bill](#)

Access to comprehensive libraries of political adverts would enable voters, researchers and others to scrutinise political campaigns and identify misinformation and disinformation. The Electoral Commission,<sup>52</sup> the Committee on Standards in Public Life (CSPL)<sup>53</sup> and the Committee on Democracy and Digital Technology<sup>54</sup> have highlighted that some platforms' voluntary libraries are inconsistent, and some are inaccurate.

Full Fact has been calling for a detailed public library of political adverts since 2020.<sup>55</sup> Regulators, other civil society organisations and Parliamentary committees have also called for this:

- In their February 2019 report on disinformation and fake news, the Culture, Media and Sport Committee called for political advertising to be publicly accessible in an independent, searchable repository, with details of who paid, who sponsored the ads, and who was targeted.<sup>56</sup>
- In their June 2020 report, the Committee on Democracy and Digital Technologies called platforms to provide a comprehensive, real-time, publicly accessible database of adverts.<sup>57</sup>
- In their July 2021 report, CSPL recommended that the government legislate to require social media platforms to create advert libraries that include prescribed categories of information.<sup>58</sup>
- The Electoral Commission has called for detailed, accurate political advert libraries since 2018.<sup>59</sup> In their January 2025 evidence to the SIT's inquiry on misinformation, the Commission said comprehensive social media advert libraries have the potential to deliver transparency to voters.<sup>60</sup>

Some large online companies have stopped hosting political adverts in some jurisdictions – including Canada<sup>61</sup> and the EU<sup>62</sup> – when they were required to publish ad information in public libraries.<sup>63</sup> This led to criticism from one expert that “that the firms are not, collectively, living up to their stated objectives (to wider society) of uplifting people's free speech rights in a way that promotes transparency and accountability for all.”<sup>64</sup>

This material is of significant interest to voters and researchers, now and in the future. But platforms have deleted it after arbitrary fixed periods and the EU repository will only retain it for seven years after each advert is published.<sup>65</sup> The leading academic Dr Claire Wardle has highlighted more broadly that “The precarious nature of the storage and accessibility of digital information is having serious consequences for fact checkers, journalists and policy-makers today, but also how historians will make sense of this period.”<sup>66</sup>

A related issue concerns overseas spending on UK political adverts. In 2021, CSPL called for a ban on foreign organisations or individuals buying campaign adverts in the UK.<sup>67</sup> The government rejected an amendment to the previous Elections Bill that sought to address this,<sup>68</sup> on the basis that the Bill reduced the scope for spending by foreign third-party campaigners to £700. However, this restriction, inserted into the Political Parties, Elections and Referendums Act 2000 (PPERA), only covers the regulated period before an election.<sup>69</sup>

**Recommendation**

The Bill should establish a comprehensive, publicly accessible repository for all paid-for political advertising. Very large online platforms and search engines should be required to make prescribed information available in

<sup>52</sup> Electoral Commission (28 January 2025) [Response to the SIT Committee call for evidence on social media, misinformation and harmful algorithms](#)

<sup>53</sup> Committee on Standards in Public Life (July 2021) [Regulating Election Finance](#)

<sup>54</sup> House of Lords Select Committee on Democracy and Digital Technologies (29 June 2020) [Digital Technology and the Resurrection of Trust](#)

<sup>55</sup> Full Fact (2020) [Full Fact Report 2020](#)

<sup>56</sup> Culture, Media and Sport Committee (14 February 2019) [Disinformation and 'fake news': Final Report](#)

<sup>57</sup> House of Lords Select Committee on Democracy and Digital Technologies (29 June 2020) [Digital Technology and the Resurrection of Trust](#)

<sup>58</sup> Committee on Standards in Public Life (July 2021) [Regulating Election Finance](#)

<sup>59</sup> Electoral Commission (June 2018) [Digital campaigning: Increasing transparency for voters](#)

<sup>60</sup> Electoral Commission (28 January 2025) [Response to the SIT Committee call for evidence on social media, misinformation and harmful algorithms](#)

<sup>61</sup> Policy Options (10 April 2019) [What have we learned from Google's political ad pullout?](#); Parliament of Canada (13 December 2018) [Bill C-76](#)

<sup>62</sup> European Parliament (27 February 2024) [Parliament adopts new transparency rules for political advertising](#); European Parliament (13 March 2024) [Regulation \(EU\) 2024/900](#); European Parliament (9 February 2023) [Why new EU rules for political advertising are important](#)

<sup>63</sup> Euractiv (25 July 2025) [Meta to stop running political ads on Facebook and Instagram](#)

<sup>64</sup> Mark Scott, Digital Politics (4 August 2025) [In defense of digital political ads](#)

<sup>65</sup> Who Targets Me (22 May 2025) [The disappearing ad library](#)

<sup>66</sup> Dr Claire Wardle (23 July 2025) [Mis\(sing\) information: The impact of disappearing archives and data sources](#)

<sup>67</sup> Committee on Standards in Public Life (July 2021) [Regulating Election Finance](#)

<sup>68</sup> Parliament (5 April 2022) [Amendments to be moved on Report for the Elections Bill](#)

<sup>69</sup> Legislation.gov.uk (2022) [Elections Act 2022](#)

the repository in real-time wherever technically feasible, and in any event no later than 72 hours after the advert is published. This should include: the content of the advert; amount spent; relevant electoral process, where applicable; who paid and, where applicable, their controlling entity; intended target audience; methods and tools for targeting; and where possible, the number of views and engagements.

Ofcom should be given sufficient resources to build and maintain the public repository, and should consult the Electoral Commission, Information Commissioner's Office (ICO), civil society and academia on the framework and the scope of transparency notices.

The electronic material should be transferred to the National Archives and made publicly available. This would enable voters, researchers and others to understand what happened in election campaigns, and to be able to hold political parties and platforms to account, without barriers to historic transparency.

Platforms should be required to comply with the transparency requirements as a condition of providing commercial advertising in the UK. Failure to comply should be an offence with sanctions that are effective, proportionate and sufficient to act as a meaningful deterrent for non-compliance.

The Bill should also amend section 89A(1) of PPERA to remove the words "during a reserved regulated period" so that foreign individuals and organisations are restricted from paying for political advertising and other controlled expenditure in the UK, above a threshold of £700, at any time.

#### 4. A regulatory framework to prevent misinformation and disinformation in political adverts

Following the 1997 general election, the Committee of Advertising Practice decided to exclude political advertising from the Advertising Standards Authority's (ASA) remit.<sup>70</sup> CSPL considered the issue and decided in 1998 that political parties should adopt a new code of practice.<sup>71</sup> After a consultation in 2003, the Electoral Commission concluded that the ASA should not regulate political advertising.<sup>72</sup>

As a result, there is currently no independent body with powers to adjudicate on the truthfulness or accuracy of non-broadcast political advertising.<sup>73</sup> Groups including Full Fact<sup>74</sup> and Reform Political Advertising have called for political advertising to be regulated.<sup>75</sup> Opinionium research, commissioned by Reform Political Advertising in 2024, found that more than half (56%) of people would trust political adverts more if they knew they were regulated.<sup>76</sup>

In June 2020, the Chief Executive of the ASA called for political advertising to be regulated and suggested that "Experts from several appropriate regulators could take on the task."<sup>77</sup> The Committee on Democracy and Digital Technologies echoed this call, recommending that experts from the ASA, Electoral Commission, Ofcom and the UK Statistics Authority "should co-operate through a regulatory committee on political advertising" and that parties should work with them to develop a code of practice "that restricts fundamentally inaccurate advertising during a parliamentary or mayoral election, or referendum."<sup>78</sup>

In 2025, the Speaker's Conference called for a code of conduct for all candidates, MPs and parties "that defines a collectively agreed set of principles to guide behaviours and language when campaigning."<sup>79</sup> The government welcomed this, emphasising in their policy paper that campaigners must be accountable for their conduct "to ensure political debate is honest, transparent and remains civil and safe for all." The government will be consulting with political parties on a code to give the public "confidence that campaigns are being conducted with honesty and integrity and are not intentionally attempting to mislead the public."

<sup>70</sup> Advertising Standards Authority (15 August 2019) [Why we don't cover political ads](#)

<sup>71</sup> The Neill Committee (1998) [Chapter nine: media and advertising](#)

<sup>72</sup> Local Government Chronicle (28 June 2024) [Report on political advertising published](#)

<sup>73</sup> House of Commons Library (4 November 2019) [Who regulates political advertising?](#)

<sup>74</sup> Full Fact (March 2023) [Full Fact Report 2023](#)

<sup>75</sup> The Coalition for Reform in Political Advertising (2020) [Written evidence to the Committee on Democracy and Digital Technologies](#)

<sup>76</sup> Reform Political Advertising (6 July 2024) [Opinionium research shows that 56% would trust electoral ads more if they knew they were regulated](#)

<sup>77</sup> Guardian (3 June 2020) [British political advertising must be regulated. How to do it is a harder question](#)

<sup>78</sup> House of Lords Select Committee on Democracy and Digital Technologies (29 June 2020) [Digital Technology and the Resurrection of Trust](#)

<sup>79</sup> Speaker's Conference on the security of MPs, candidates and elections (23 May 2025) [First report](#)

However, the code is not included in the Bill and the details remain to be seen. This includes the scope of the code, whether a body will be responsible for ensuring compliance and deterring non-compliance, their level of independence from parties and government, and their resourcing and powers.

## Recommendation

The Bill should place the government's proposed campaigning code of conduct on a statutory footing, with minimum standards on honesty, accuracy and transparency in political ads, including use of AI-generated content. Compliance should be mandatory for registered parties, candidates and campaigners.

The Bill should also establish an independent regulatory committee, comprising relevant experts from the ASA, Electoral Commission, Ofcom, the UK Statistics Authority and the ICO, with powers to adjudicate breaches. The ASA exercises a range of sanctioning powers that could be given to the Committee.<sup>80</sup>

The regulatory committee should be chaired by someone appointed through a process that guarantees a high level of independence from the government of the day. The committee would need sufficient resources to adjudicate on claims at speed during campaign periods.

## 5. Transparent and accountable systems for dealing with electoral information incidents

Despite the policy paper's stated aim of "futureproofing our democracy", the Bill does not include measures to deal with information incidents that could threaten the fairness of a UK election. Nor does it increase the transparency and accountability of the government bodies involved in electoral security.

Serious information incidents during a campaign could include, among other things: coordinated foreign interference designed to suppress turnout or distort debate; rapid and coordinated spread of synthetic (AI-generated) content; false claims about voting procedures affecting when, where or how to vote; and accumulated influence operations that call the legitimacy of the election into question.

The UK is an outlier among some of its key allies – including the Five Eyes: US,<sup>81</sup> New Zealand,<sup>82</sup> Australia,<sup>83</sup> and Canada<sup>84</sup> – by failing to publish protocols for electoral information incidents. Full Fact has called for a critical election incident public protocol based on the model in Canada since 2022.<sup>85</sup> In January 2025, a minister confirmed there were no plans to introduce a Canadian-style protocol given (unpublished) processes in place.<sup>86</sup>

A number of government bodies work to monitor and respond to threats in the information environment. These bodies have limited public visibility, are not underpinned by legislation, and operate without a published, statutory framework governing public disclosure during election campaigns:

- The National Security Online Information Team (NSOIT) "undertakes work to understand the extent, scope and the reach of misinformation and disinformation."<sup>87</sup> Among other things, NSOIT "analyses attempts by foreign states to artificially manipulate the online environment"<sup>88</sup> and responds to periods of acute disinformation risk, including during UK elections.<sup>89</sup>
- The Joint Election Security Preparedness Unit (JESP) "...coordinate[s] election security and preparedness activity within government and externally."<sup>90</sup> JESP stands up the Election Cell ahead of major democratic events, which brings together departments, intelligence agencies and external partners, including the

<sup>80</sup> Advertising Standards Authority (undated) [Sanctions](#)

<sup>81</sup> Cybersecurity and Infrastructure Security Agency (October 2024) [Election Infrastructure Incident Response Communications Guide](#)

<sup>82</sup> New Zealand Government and Electoral Commission (August 2023) [Introduction to inter-agency protocols for New Zealand's 2023 General Election](#)

<sup>83</sup> Australian Electoral Commission (undated) [Electoral Integrity Assurance Taskforce](#); Australian Government and Electoral Integrity Assurance Taskforce (January 2025) [EIAT Communication Protocol](#)

<sup>84</sup> Government of Canada (modified 24 March 2024) [Cabinet Directive on the Critical Election Incident Public Protocol](#)

<sup>85</sup> Government of Canada (modified 2 July 2025) [Critical Election Incident Public Protocol](#)

<sup>86</sup> Ministry of Housing, Communities and Local Government (22 January 2025) [Parliamentary question: election](#)

<sup>87</sup> HM Government (17 March 2022) [Government response to the Joint Committee report on the draft Online Safety Bill](#)

<sup>88</sup> Department for Science, Innovation and Technology (17 May 2024) [Parliamentary question: fraud](#)

<sup>89</sup> Department for Levelling Up, Housing and Communities (14 July 2023) [Parliamentary question: Elections: Artificial Intelligence](#)

<sup>90</sup> Department for Levelling Up, Housing and Communities (5 February 2024) [Parliamentary question: Elections: National Security](#)

Electoral Commission,<sup>91</sup> to monitor and respond to emerging issues, including information incidents.<sup>92</sup> The Cell has coordinated teams to respond to AI-generated disinformation.<sup>93</sup>

- The Defending Democracy Taskforce (DDT) was set up in 2022 “To coordinate and drive progress on the Government’s work to protect UK democratic processes, institutions and society.”<sup>94</sup> It bridges gaps between the national security establishment and others, including large tech companies.<sup>95</sup> There is little public information about the work of the DDT.<sup>96</sup>

As a group of academics specialising in intelligence and security identified in March 2024, the disparate organisations involved pose problems for coordination and the DDT’s aim of ensuring public confidence in the electoral system; and the structure, funding and activities of the Defending Democracy programme are unclear.<sup>97</sup> They noted that this lack of information poses serious issues for public trust.

The goal of the Defending Democracy programme is to “ensure the integrity of the UK’s democratic processes and sustain public confidence in them.”<sup>98</sup> To deliver on this, the government should be more transparent about its electoral security infrastructure. In particular, it is not clear whether, in what circumstances, or by whom the public would be notified about an incident that threatens the fairness of an election during a campaign, nor how that decision can be taken independently of ministers and the government of the day.

## Recommendation

The Bill should establish, in statute, a critical election incident public protocol, based on the model in Canada. It should identify the body responsible for implementing the protocol, their decision-making processes, how independence from government is ensured in practice, the procedures for identifying and responding to incidents, including the threshold for triggering the protocol, and post-election reporting processes.

This would ensure that any decision to inform the public about an information incident (or accumulation of incidents) during an election campaign, that could impact the UK’s ability to have a free and fair election, is taken independently of the government.

In establishing the protocol, the government should be more transparent about the bodies (including DDT, JESP, the Election Cell and the NSOIT) working on electoral security. This should include a web page to inform public understanding and build public trust, with details of: the bodies’ objectives, their roles and work in relation to misinformation and disinformation and other threats, accountability, resourcing, and information about how they work with each other, regulators and elected representatives.

The activities of these bodies need to reflect the fact that misinformation and disinformation are ongoing threats, and information incidents that harm the UK’s democracy can happen at any time. They should be part of a wider, transparent framework for identifying and responding to information incidents – in addition to the protocol covering election periods – based on a model previously published by Full Fact.<sup>99</sup>

This electoral security infrastructure should help to ensure that factual public information is quickly and effectively communicated, to identify, analyse and counter electoral influence operations, like the Psychological Defence authority announced in Sweden in 2018.<sup>100</sup> It should also support Ofcom, the Electoral Commission and other actors on media literacy initiatives, considered further below.

## 6. Increased investigative powers for the Electoral Commission

<sup>91</sup> Electoral commission (30 October 2019) [Commissioner Day notes](#)

<sup>92</sup> Ministry of Housing, Communities and Local Government (22 January 2025) [Parliamentary question: Joint Election Security Preparedness Unit](#)

<sup>93</sup> Dan Jarvis MBE MP (18 December 2024) [Letter to Joint Committee on the National Security](#)

<sup>94</sup> Suella Braverman KC MP (27 March 2023) [Letter to Home Affairs Committee](#)

<sup>95</sup> HM Government (March 2023) [Integrated Review Refresh 2023](#)

<sup>96</sup> Spotlight on Corruption (March 2024) [Submission to Joint Committee on the National Security Strategy inquiry on defending democracy](#)

<sup>97</sup> Dr Hugo Drochon, Dr Dan Lomas, Prof Rory Cormac (March 2024) [Evidence to the JCNS inquiry on Defending Democracy](#)

<sup>98</sup> HM Government (March 2021) [The Integrated Review of Security, Defence, Development and Foreign Policy](#)

<sup>99</sup> Full Fact (2020) [Framework for Information Incidents](#)

<sup>100</sup> The Local (15 January 2018) [Sweden to create new authority tasked with countering disinformation](#)

The Bill strengthens the Electoral Commission’s enforcement and information-sharing powers – including the maximum fine it can impose and new powers to share information with other regulators and the police. However, it leaves a significant gap which will limit the practical impact of those reforms.

Unlike the ICO, the Electoral Commission does not have the power to obtain information outside of a formal investigation. This means it cannot compel online platforms to provide information in real time during an election unless a formal investigation has already been opened. The Commission has previously expressed concern about the impact this has on their ability to act quickly.<sup>101</sup>

- The Electoral Commission has called for this power, including in 2018 and again in 2020, to enable it to assess allegations more quickly and determine whether an investigation is necessary.<sup>102</sup>
- In 2020, the Lords Democracy and Digital Committee called for the Commission to have the power to acquire information from external parties, such as social networks, outside of a formal investigation.<sup>103</sup>
- CSPL recommended in 2021 that the Electoral Commission’s powers to compel the provision of documents, information and explanation outside of an investigation should be extended.<sup>104</sup>

**Recommendation**

The Bill should give the Electoral Commission the power to obtain information outside of a formal investigation, including from online platforms. This would enable it to better monitor and enforce the rules about how campaigners spend money to influence voters – which might include analysing bots, adverts paid for by overseas actors, and content that is being sponsored and boosted by campaigners.

The Commission should be adequately resourced to research and deploy effective public information campaigns about deepfakes and misinformation during election periods, and to work alongside Ofcom, civil society and educators to support wider media literacy initiatives.

## 7. A statutory duty for platforms to provide effective media and political literacy

With the extension of the franchise to younger voters, the government has a responsibility to ensure that they can navigate today’s complex information environment. The Bill contains no measures to support this. People aged 18-24 report seeing more misinformation about UK elections than older groups.<sup>105</sup> As Shout Out UK and the APPG on Political and Media Literacy highlighted, “the success of this franchise extension is inextricably linked to the robust implementation of Political and Media Literacy education.”<sup>106</sup>

As noted above, recent research by Full Fact and Internet Matters underlines the urgency. Only half of the 13-17-year-olds surveyed felt confident that they could distinguish true political information from false, and 60% were concerned that AI-generated content may affect the results of a general election.<sup>107</sup>

Platforms play a key role in shaping how young people encounter, interpret and engage with information about news, politics and current affairs. Embedding media and political literacy features would reinforce skills in practice, reduce the burden on young people to navigate complex information environments, and complement education-based approaches by supporting safer and more informed engagement online.

<sup>101</sup> House of Lords Select Committee on Democracy and Digital Technologies (29 June 2020) [Digital Technology and the Resurrection of Trust](#)

<sup>102</sup> Electoral Commission (2020) [Electoral Commission response to the Committee on Standards in Public Life review of electoral regulation](#)

<sup>103</sup> House of Lords Select Committee on Democracy and Digital Technologies (29 June 2020) [Digital Technology and the Resurrection of Trust](#)

<sup>104</sup> Committee on Standards in Public Life (July 2021) [Regulating Election Finance](#)

<sup>105</sup> Electoral Commission (9 July 2025) [Report on the May 2025 local elections in England](#)

<sup>106</sup> Shout Out UK and the All-Party Parliamentary Group on Political and Media Literacy (July 2025) [Government reconfirms commitment to Votes at 16: A joint statement from the APPG on Political & Media Literacy and Shout Out UK](#)

<sup>107</sup> Internet Matters and Full Fact (10 February 2026) [Preparing young people to vote in a complex, attention-driven information environment](#)

## Recommendation

The Bill should introduce a statutory duty on large online platforms to embed effective media and political literacy by design, underpinned by a statutory code of practice setting clear minimum standards, accountability and oversight mechanisms. This should include the following features:

- Clear indicators for AI-generated or manipulated content, enabling users to understand when material may not reflect real events or people.
- Design features that support critical evaluation, such as prompts that encourage pausing before sharing unverified content, and tools that provide context or signal the reliability of sources.
- Greater transparency and user control over recommender systems, including clear explanations of why content is shown and accessible options to manage, filter or report misleading or distressing material.