

**WRITTEN EVIDENCE SUBMITTED BY REFORM POLITICAL ADVERTISING TO THE COMMITTEE
(RPB22)**

REPRESENTATION OF THE PEOPLE BILL

1. Who we are

1.1. Reform Political Advertising (RPA) does what it says on the tin: founded some eight years ago, we are a small group campaigning for the rules for transparency and factual accuracy in electoral campaign material.

1.3. We are determinedly politically neutral; we are non-profit and run by unpaid volunteers, all of whom hold or held senior positions in the advertising industry and all of whom have had contact and interaction, some short term, some longer, at senior levels with politicians from all parties. For example, we held a cross-party panel discussion event at the House of Commons in partnership with the Fair Elections APPG on 27th October, 2025 ‘Preventing misinformation and disinformation in campaigning,’ in the context of what was then known as the Elections Bill. A recording is available [here](#).

1.4. The chairman of our Electoral Advertising Review Panel is (Lord) David Puttnam, who chaired the House of Lords Democracy and Digital Technologies Committee’s 2020 [Digital Technology and the Resurrection of Trust](#).

1.5. Our advertising code (see appendix B) was signed up to and supported by the likes of Sadiq Khan, Andy Burnham, Tracy Brabin, Lord Kinnock and six candidates across the political spectrum in the 2024 London mayoral elections.

1.6. Our premise is that electoral campaign material is:

- Often seriously misleading;
- Distrusted by the vast majority of voters;
- Of even greater significance in these political times.

In the course of this submission, we provide evidence that supports all of the above.

2. What we seek

2.1. It’s clearly important that we define our terms, as proposals in this territory are sensitive. The government of the day’s response to the House of Lords Committee recommendations referenced above was protective of ‘policy or political arguments’ and the current government’s response to the 2024 Speaker’s conference on the Security of MPs, Candidates and Elections was similarly defensive in rejecting the notion of an extension to the scope of RPA 1983 Section 106 beyond personal conduct and character and, in our view, rightly so.

2.2. We are very clear that we do not propose the regulation of ‘political statements,’ to use the term most frequently deployed by government, where those statements are in debate or on the hustings or the doorstep, where they concern policy or political opinion or position or vision or argument, or indeed when there is any expression of political view in any form of campaign material. The communication of political views must of course be protected in perpetuity, or “defended to the death”; the distortion and manipulation of factual evidence should not be afforded the same security.

2.3. It is when the ‘political statements’ term is used to defend the indefensible that we and many other commentators [express](#) considerable concern and the view that there are some limited and specific versions of political statements that should be addressed for their ability to undermine the democratic process, because that is what is happening in the case of a significant proportion of electoral messages in campaign material.

2.4. We will later show and provide many examples of the transgressions outlined above, but we should define our terms and *why they matter* as best we can meanwhile. We are proposing that the following should be subject to a form of regulation that is outlined in an amendment to the bill:

Factual claims in election campaign materials that include but are not limited to leaflets, newspaper-style mailings and drops, paid advertising in print media and factual claims in party-owned spaces on social media platforms.

2.5. We should be clear what we mean and don’t mean by ‘factual claims’. These are commonly defined as ‘assertions that can be proven true or false through evidence or data.’ Thus ‘We send the EU £350 million a week’, or, at the other end of the scale, ‘We won more seats than party x in this ward last year’ are examples and as we have indicated, more follow later in this paper and a great deal more are separately available and later linked.

2.6. To expand a little further on scope, there’s clearly a difference between a fact-based claim and a *promise*, thus ‘We will build 40 new hospitals/ 1500 new homes in this parliamentary term’, no matter the scale of the challenge or the established track record of delivery, remains a protected species. The voter can decide whether they believe such a claim or otherwise; they do not, however, have the ability to make the same judgement when presented with a fact-based claim, because they either expect the claim to be correct or don’t have the means, time or inclination to check it.

2.7. Expanding further still, we do not propose any form of intrusion into campaign speech, unless subsequently or simultaneously also expressed in advertising. There’s an important distinction and point to be made in this context. An incorrect fact-based claim in a speech is a very different matter to one in an advertisement. The first instance may well be in error and, more importantly, understood to be a political pitch and assessed, favourably or otherwise, on that basis often by a relatively small audience and often reviewed by third-party media which will contextualise or comment on the claims then read by a larger audience, duly more fully informed. In other words, political speech is very often ‘filtered’ anyway.

2.8. No such filter exists for the same communication in advertising. This is in part because there are no rules that restrict electoral advertising’s more extreme utterances (aside from those set out under RPA 1983, irrelevant in this fact-based context) but also because the message is ‘in writing’ and therefore, as perceived by the voter, subject to due process and therefore attention to its accuracy. In too many cases, as we will later show, that attention has been wilfully absent.

2.9. Furthermore, advertising per se is widely understood to be regulated. People are less certain whether electoral advertising is in remit [research](#) by Opinium showed that 65% of respondents either thought that electoral ads are regulated or didn’t know either way. This point has some important ramifications: reminding ourselves that political advertising is the least trusted of all forms of advertising and that its worst examples are as likely to be

considered to be regulated as otherwise, then much electoral advertising *brings advertising and its self-regulatory system into disrepute. This is the issue that we ask the committee to consider with great care: in allowing some limited forms of 'political statement' to remain entirely free of any kind of oversight is to allow damage to a whole industry, one which delivered £109 billion in Gross Value Added to the UK economy as of 2024.*

2.10. Damage is not, of course, confined to the advertising industry. Those responsible for pulling the trigger on the more egregious examples of electoral advertising are also shooting themselves and parliamentary colleagues in collective feet: political advertising is the least trusted form and politicians the least trusted profession. We suggest that some of the former contributes to some of the latter.

2.11. Protection of 'political statements' in all forms may be presented as protection of free speech and thus entirely worthy, but the uncomfortable reality is that its excessive scope protects a license to lie. All political parties exploit that opportunity for gain and the consequence is a damaged industry, distressed voters and distrusted politicians.

Deepfakes, digital imprints and database

2.12. We also seek recognition that new digital tools permit some potentially alarming disruptions of the campaigning process. AI-generated deepfakes enable realistic impersonations of political candidates, including fabricated audio and/ or video. Conservative MP George Freeman spoke at our House of Commons event referenced above about his own experience of this practise; Mr Freeman was 'deepfaked' to communicate, entirely without foundation, that he was leaving his party. We propose that it should be illegal to create or distribute digital content that falsely purports to be a political candidate, or claims to be speaking for them, with the intent to deceive voters. There should be exemption for parody, satire or artistic expression.

2.13. The Bill clarifies enforcement of imprint rules and strengthens oversight. But it does not explicitly legislate for clear, prominent party identification in the way the strategy paper suggested. That distinction matters. A spider-type promoter's name does not clearly identify the political party responsible for the message. [YouGov research](#) finds that 81% of the public think it is important that "it is clear which political party is responsible for an advertisement." Point 3.7. below carries an example of how poor regulation (in this case PPERA 2000) can be exploited. The 2022 Elections Act failed to address the problem, despite our own and others' representations to the Cabinet Office.

2.14. Digital campaigning has transformed political communication, but it has also created opacity in the form of "dark advertising" or microtargeting (ads that are only seen by the audience they are targeted to, and not open to scrutiny). This tactic emerged during the Brexit referendum and continues to challenge transparency in online campaigning. Our third recommendation is therefore the creation of a transparent, searchable repository of election advertising, including who paid for the advert, which organisation sponsored it, who was targeted, and how much was spent.

Some platforms maintain ad libraries, but these are fragmented, inconsistent and controlled by the platforms themselves. There is no independent, statutory, comprehensive UK repository. RPA was the first to propose the concept of an independent database of election ads in 2018 to the DCMS Fake News and Disinformation Inquiry; the concept was included in the recommendations of the inquiry as per our proposal below.

Across the European Union, regulation has moved in this direction. From March 2026, [the EU will launch a centralised repository](#) for political ads, with metadata, targeting information, API access and authentication protocols. It's a significant step forward in solving the problem of 'secret' electoral advertising, invisible to journalists, researchers and voters. In an era of data-driven persuasion, transparency is foundational to trust.

3. Electoral and referenda advertising

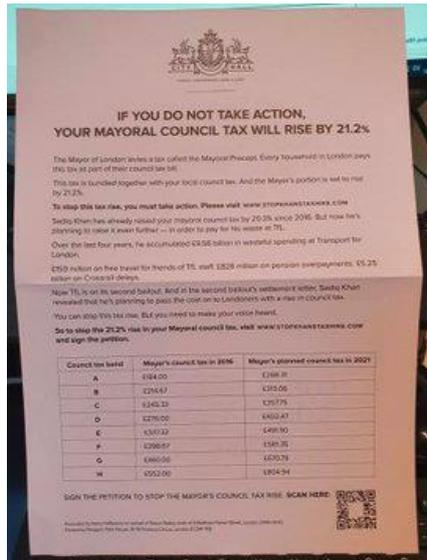
3.1. Guidance on making a submission to the Committee requires that documents should 'contain as few logos or embedded pictures as possible', a requirement that we observe as best we can, given that the optimum way to provide evidence of misleading communication in campaign material is to show it. Respecting guidance, we have considerably restricted visual references and instead point the Committee to our extensive reviews of General, local and mayoral elections over the course of the past seven years, most of which work can be found on [our website](#).

3.2. To a degree, we were inspired to begin this effort by the example below which, despite the attentions of ONS for its inaccuracy and strong reactions from a number of other quarters for the same reason, was 'permitted' to appear for the duration of the Leave campaign because there were no means either to prevent or sanction its appearance. (We should remind the Committee that RPA is politically neutral; we have no views on election outcomes beyond how they might be affected by misleading campaign material).



3.3. While it is clearly the case that there were many examples of contentious electoral advertising before appearance of the above, developments since 'the £350 million bus' indicate that it appeared to establish a new 'anything goes' culture in campaign material: the politically possible outcome via dissemination of inaccurate claims against which there was no recourse. It is as if the dam burst; certainly, voters have since been flooded.

3.4. Per above, we have set out the many and various subsequent examples on our website and with the committee's guidance on the use of embedded visuals in mind, shown below are only four instances of campaign material that we suggest are particularly noteworthy in this context:



3.5. The leaflet above, announcing potential changes to mayoral council tax, appears to be from 'City Hall', complete with an entirely fictitious logo (City Hall was anyway no longer in existence at that time). It transpires that the leaflet is actually from Shaun Bailey, a candidate for London mayor in the 2021 elections.

3.6. Sender identification at the base of the leaflet is as follows: 'Published by Kerry Halfpenny on behalf of Shaun Bailey, both of 4 Matthew Parker Street, London, SW1H 9HQ.' The Committee will be aware that that is the address of Conservative Campaign Headquarters, though this 'detail' is omitted.

3.7. It was considered by the Electoral Commission, and by the Metropolitan Police to whom we submitted a complaint (as did the Labour Party), that this material delivered the requirements of PPERA 2000. The subsequent attention of the 2022 Elections Bill to the extension of identification requirements into the online space did not take the opportunity to ensure that political party identification should also be included. We should also point out that the leaflet remains deceptive even with the correct source of several inaccurate claims.

3.8. The Liberal Democrats have extensive 'form' on the matter of deception in campaign communications, carving out a special position in the minds of the better-informed voter as the purveyor of 'dodgy bar charts.' The term is inadequate, really, as the many examples contained in our reviews are way beyond mere 'dodgy'; one such is from the Fulwood Sheffield ward in the 2023 local elections:



3.9. In some ways, the leaflet is even more deceitful than we have suggested, because some of it is true: Labour did indeed have 39 seats last time (i.e. 2022), Lib Dems 29 (though the graphic is not proportionately correct, to give the impression of a closer contest) and 'Cons' just the 1 seat. Amplification under the chart asserted 'the Conservatives finished third in our area last time.'

3.10. This claim came as something of a surprise to the Green party, which garnered 14 seats in 2022. The intent of the leaflet, of course, is to turn the vote into a two-horse race; any means by which Green votes can be reduced similarly reduces the chance of a Labour/ Green alliance and controlling position.

3.11. In the 2023 election, Mr. Sangar garnered 3427 votes, up from Cliff Woodcraft's 2,689 in 2022. The Green party won 752 votes, down from 1,110 in 2022 and a very different result to the national picture, where they won some 200 seats. The Labour party was also down in Fulwood (1810 in 2023 versus 1955 last time) and also untypical of the national trend.

3.12. We can't prove that this leaflet was the cause of changed voting patterns, but the correlation alone should give pause.

Tit for tat

3.13. The Committee may recall a furore at the 2019 General election over the Conservative Party's deployment of the fictional 'Fact Check UK.' The party's press office Twitter (as was) account rebranded itself as FactcheckUK for the duration of the leaders' debate, issuing a series of "correcting" statements on the Labour leader's "lies".

3.14. The recent (February 2026) Gorton and Denton by-election featured this leaflet apparently from an independent tactical voting source:



3.15. It transpires that the Labour Party was responsible (we understand that the reverse of the leaflet referenced their candidate, not the party) and two established tactical voting organisations recommended the strategic choice to stop Reform is in fact the Greens.

3.16. In our campaigning, we have often made the point that deception begets deception. Dirty trick must be met with dirty trick because otherwise you will be 'out-dirty-tricked' and besides, there are no rules.

Not much reform here

A screenshot of a Facebook advertisement for Reform UK. The ad is sponsored and paid for by Reform UK. The main text reads: "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". Below this is a large image with the headline "IMMIGRATION ISN'T WORKING." and a sub-headline "ONS: 14 million will arrive in the next 12 years." The image shows a long queue of people waiting outside a building with signs for "NHS" and "GP". A small graphic in the bottom right of the image says "TRUE IMMIGRATION ALLOCATION" with a blue 'X' over it. At the bottom of the ad, there is a "Sign up" button and a small text block: "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."

3.17. The above ad appeared on Facebook from the Reform official account in the context of the 2024 General Election and includes claims that 14 million immigrants will arrive in the UK within the next 12 years, *according to official ONS projections*.

3.18. 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.

3.19. 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 and forgotten, this is a 'known untruth' or a calculated piece of chicanery or, as voters like to put it – a lie.

4. What does the voter think?

4.1. The 2019 Audit of Political Engagement finds that some 80% of respondents have 'little or no trust' in MPs in general. According to IPSOS' December 2023 data that figure has worsened to the point where just 9% trust politicians (the November 2025 survey finds the same result), the lowest score in forty years. Two per cent of those aged 25-34 consider politicians to be truthful.

4.2. Electoral Commission (EC) [research into the 2024 campaign](#) found: *"Over half of people said they saw misleading or inaccurate information about political parties' policies (61%) and candidates (52%) at the general election."*

4.3. The EC's [2019 campaign research](#) found that: *"People were concerned about misleading campaign techniques from across the political spectrum, and bias in the media. We received a large number of complaints raising concerns about the presentation, tone and content of election campaigns."*

4.4. Advertising Association research finds that political advertising is the least trusted form of advertising: *"The latest findings from Q1 and Q2 of Credos' Public Trust Tracker....Just 28% of people trust political advertising – a significant drop from the 39% who trust advertising more generally. 18% are very concerned about political advertising, especially older voters. When informed that the ASA have no regulatory power over political ads, 72% responded that they should."*

4.5. Our own research conducted by YouGov in 2019 and 2021 found that some nine out of ten voters (consistently across party affiliation), think that it should be a legal requirement that factual claims in electoral advertising are accurate. Our 2023 Opinium research found that *just 4% of voters do not support the idea of regulation of factual content of electoral advertising.*

5. Why regulation of some campaign material is particularly important at this time

5.1. It will not have escaped the Committee's notice that the political landscape is in something of a state of flux. While reluctant to pass any kind of comment on the nature of that landscape, we believe we are on safe ground when stating that the playing field since the last General Election in 2024 has considerably expanded: that where there were two and a half players, as it were, there are now five.

5.2. Self-evidently, that means a fragmentation of the vote, which in turn means a closer race (researchers MRS project 28.4% of seats in 2026 to be marginal, i.e. won by 5% or less), which in turn means that parties will be scrapping for every vote, which in turn means pushing the boundaries in claims in currently unregulated campaign material. And:

- The May 2025 Runcorn by-election was won by six votes, 0.02% of the vote
- In the Doncaster mayoral election, also May 2025, Labour won by 1% of the vote
- Labour won by a margin of 0.8% of the vote in the North Tyneside mayoral election

5.3. The Committee may consider that advertising will not play a dominant role in voter decisions and they would be correct for the most part that its role will be lesser than in most

sectors and voter preferences will be conditioned by significant factors less present in a commercial context

5.4. However, with close to a third of all seats at 5% margins, RPA's collective experience of several decades in advertising allows us confidently to predict that advertising's contribution at the margins will be critical and, as we have shown, much of that advertising is grossly misleading. In elections to come, almost a third of new or existing Members of Parliament, councillors, mayors and other officials will have lied their way into positions of power. Unless we are finally heard.

Appendix

RPA DRAFT ADVERTISING CODE

Electoral advertising: our commitment

In our advertising we will:

- Make every reasonable effort not to mislead voters;
- Ensure that factual claims are accurate according to recognised sources;
- Hold relevant and reliable evidence for factual claims, which will either be sourced in the advertising or made available if requested;
- Acknowledge it if we make a mistake and issue a public correction as quickly as possible;
- Inform audiences when we use generative AI.

The following is guidance for sourcing:

- Recognised published sources are the ONS, UKSA, HoC library, Police UK for crime stats, government departments, OECD, IMF, IFS. 'OF' regulators for energy/ water stats; other sources that most reasonable people would regard as an independent authority on the related issue;
- When quoting statistics, relevant sources and the applicable periods should be referenced; see [UKSA Code of practice](#);
- When showing poll data, where possible the polling dates, sample size and name of polling company should be shown; ideally a web address and/or other source where data tables may be viewed. [See MRS/Impress guidance](#);
- When labelling election material with the required identifiers per Representation of the People Act 1983 and the Elections Act 2022, these should be sufficiently clear and prominent to the average reader. See ASA advice [Use of Qualifications](#);
- The political party should be identified within the above as well as the promoter and candidate, unless it is already clear from the context;
- When incorporating related election results, the election (s) should be clearly identified and results accurately reported or this information to be made available via link;

- When inviting consumers to participate in research, privacy legislation and the [MRS Code of Conduct](#) should be observed;
- Material that includes the use of generative AI will carry a message informing audiences accordingly. It might also be stated that such material remains subject to the normal review processes.

MARCH 12, 2026