Second reading briefing – Representation of the People Bill
Create a comprehensive, centralised public library of political adverts

The government's policy paper for electoral reform recognised that our democracy *"is being threatened by misinformation"*. The Prime Minister has said he is *"very worried about the potential for misinformation in future elections in this country."* However, the Representation of the People Bill does not address this serious and growing threat, and risks being a missed opportunity to safeguard UK democracy and restore public trust.

However, the Bill fails to address the serious lack of transparency in online political advertising. At a time when digital campaigning plays an increasingly central role in elections, this omission leaves voters in the dark, lets misleading adverts spread unchecked, and misses a crucial chance to strengthen safeguards.

The need for advertising transparency

Companies that run political adverts in the UK are not required to publish details of those adverts, including who paid for them, how much they spent and who they sought to target. Voters have a right to know this information.

A comprehensive, centralised library of political adverts would enable:

- **Scrutiny**: providing detection of misleading content and analysis of targeting practices.
- **Regulatory oversight**: supporting regulators and law enforcement to oversee campaign rules.
- **Independent research**: tracking trends in political influence and misinformation.
- **Historical record-keeping**: preserving election campaigns for future accountability.

There is longstanding cross-party and expert consensus on the need for greater transparency:

- **The Culture, Media and Sport Committee (2019)**: recommended an independent, searchable repository with details of who paid, who sponsored the ad and who was targeted.
- **The Committee on Democracy and Digital Technologies (2020)**: recommended that platforms should provide a comprehensive, real-time, publicly accessible ad library.
- **The Centre for Data Ethics and Innovation (2020)**: said that platforms should host publicly accessible ad archives for types of personalised advertising, including political ads.
- **The Committee on Standards in Public Life (CSPL) (2021)**: called for legislation to require social media platforms to create ad libraries with prescribed categories of information.
- **Electoral Commission (2025)**: said that social media companies which run political adverts should have ad libraries, something the Commission has recommended since 2018.

Limitations of current arrangements

Some platforms have voluntary ad libraries. However, both the Electoral Commission and CSPL have highlighted that these vary in terms of their scope and features. Many omit targeting, spend data or the content itself.

In recent years, some large online companies stopped hosting political adverts when jurisdictions – including Canada and the EU – required them to publish ad information in public libraries.

This material is of interest to voters and researchers, now and in the future. But platforms have deleted it after fixed periods. The EU library retains adverts for seven years, after which they may be removed. For democratic accountability and historical research, this material should be preserved permanently in the UK's public record.

Foreign spending gaps

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. The government rejected an amendment to the

previous Elections Bill that sought to address this, on the basis that the Bill reduced the scope for spending by foreign third-party campaigners to £700.

This restriction, inserted into the Political Parties, Elections and Referendums Act 2000 (PPERA), only applies during the regulated period before an election. Outside that period, foreign individuals or organisations can spend above the £700 threshold on political ads and other controlled expenditure. In an information era where foreign actors work to influence UK politics on a longer term and sustained basis, this is not sufficient.

Recommendations

(1) Create a political ad library

The Bill should establish a comprehensive, publicly accessible library for political ads. Very large online platforms and search engines should be required to publish prescribed information in the library in real-time wherever technically feasible, and in any event no later than 72 hours after publication.

This should include: the ad content, spend, electoral context, paying entity and its controlling interest, target audience, targeting methods, and, where available, reach and engagement metrics.

Ofcom should be given sufficient resources to build and maintain the library, reflecting its responsibilities in regulating platforms. It should consult the Electoral Commission, Information Commissioner's Office, civil society and academia when setting the framework and scope of transparency notices.

The electronic material should be transferred to the National Archives and preserved as part of the public record. This would enable voters, researchers and others to understand what happened in campaigns, and to be able to hold political parties and platforms to account, without historic barriers to transparency.

Platforms should be required to comply with the reporting requirements as a condition of providing commercial advertising in the UK. Failure to comply should attract effective and proportionate sanctions.

(2) Close the foreign spending loophole

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

Conclusion

An independent, comprehensive, publicly accessible ad library would increase accountability of political campaigns and platforms, enable timely scrutiny of misinformation, protect the integrity of elections and strengthen public trust. It would also ensure that campaigns are preserved as part of the public record.

This is one in a series of briefings by Full Fact on measures to strengthen the Bill:

1. Upgrade the Online Safety Act to safeguard the UK's democracy.
2. Create stronger rules to deal with political deepfakes.
3. Establish a comprehensive public library of political adverts.
4. Regulate to prevent misinformation and disinformation in political campaigns.
5. Create a transparent system for dealing with electoral information incidents.
6. Increase the investigative powers of the Electoral Commission.
7. Give platforms a statutory duty to support effective media and political literacy.

For more information, please see our policy paper. To discuss the issues raised in this briefing, please contact George Havenhand, Policy Manager at Full Fact, on george.havenhand@fullfact.org.