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Voters' Understanding of Electoral Spending: Evaluating UK Transparency Mechanisms

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ABSTRACT

Transparency is core to the principle of electoral oversight and can provide information that informs voters' experience of elections. Information disclosure is designed to allow voters, the media, academics, and civil society to hold political actors to account. However, in the context of evolving campaign practice, the effectiveness of transparency mechanisms needs to be consistently scrutinised (Electoral Commission, 2018). In this paper, we examine a lauded system of electoral transparency – the UK's electoral finance regime (Power, 2020) – and evaluate its effectiveness. Analyzing a unique dataset of 22,720 separate items of expenditure and 5770 invoices recording campaign spending at the 2019 UK general election, we review the sufficiency of the process and content of existing transparency disclosures. Our findings show significant deficits in the system of electoral transparency. We find that UK parties are not reporting data consistently, meaning that invoices are regularly uninformative, and that existing reporting categories are unable to capture the full spectrum of electoral activity. These findings are significant for understanding the requirements of an effective disclosure regime, and suggest that existing disclosures could be enhanced to inform voters and enrich voter experience.

KEYWORDS

Transparency; Election Spending; UK General Election; Disclosure; Trust

Introduction

The practice of election campaigning is in a constant state of flux, having implications for how voters experience the run up to election day (James and Garnett, forthcoming). In response to a range of contextual factors, such as the availability of new technologies, the sharing of best practice from elsewhere, and the emergence of new campaigning ideas, parties and other organisations often change the way they engage voters (Dommett & Temple, 2018; Gibson, 2013; Karlsen, 2013; Magin et al., 2017). Whilst this has the potential to improve voters' experience and deliver positive democratic outcomes, it can also potentially disrupt voter expectations of and confidence in elections. In light of democratic ideals outlining the need for elections to be open and transparent, and for citizens to be able to understand attempts to influence their vote, these trends raise possible concerns (Dahl,

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1989; Forestal, 2022; Johnston, 1997; Norris, 2012; Tucker et al., 2017). Whilst many scholars have cast empirical light on the conduct of modern election campaigning (Gibson, 2020; Kefford, 2021; Nielsen, 2012), within this paper we focus on the sufficiency of existing disclosure systems, asking what information these systems provide for voters and whether they are able to sufficiently educate citizens about the nature of the elections they experience.

To interrogate this question, we scrutinise long-established state-systems of electoral transparency. Forms of electoral finance transparency are implemented in jurisdictions around the world, and capture information about the conduct of campaigns. The broad aim is to enable independent scrutiny and oversight, but it is unclear whether existing transparency disclosures are all that informative. In particular, there are unanswered questions about the degree to which the *process* (i.e. how information is disclosed) and the *content* (i.e. what information is disclosed) of disclosure aids the understanding of modern elections. Accordingly we pose the research question: 'How informative is the UK's system of electoral finance disclosure as it relates to party spending at general elections?' Considering this question, we discuss the consequences of current disclosure practices for ordinary citizens, and ask whether existing practice helps to uphold democratic norms.

Our analysis finds that, when it comes to process, UK parties are not reporting data consistently and frequently present information in a careless, opaque or even potentially deliberately misleading way. Furthermore, we find that the content of disclosures is unclear, with existing activity classifications failing to capture the full spectrum of electoral activity. These findings are significant for understanding the requirements of an effective disclosure regime, but also suggest that even an apparently world-leading transparency system may not be providing effective information for voters or other election observers. Our analysis accordingly points to the need to revisit existing regulation to ensure that disclosures are able to cast light on the business of election campaigns.

The Appeal of Transparency: Accountability, Corruption and Trust

The idea of rendering information visible either directly to citizens, or indirectly through academia, civil society or the media, is a common response to uncover corruption and more generally probe concerning practices in political systems (Berliner, 2014; Etzioni, 2010; Hood & Heald, 2006; Stiglitz, 2003). In the context of elections, transparency has been cited as 'the most important requirement' of a 'magic quadrangle' (transparency, professional accounting, administrative practicality and the possibility of sanctions) that ensures the effective regulation of money in politics (Nassmacher, 2003, p. 139).

Reliable, informative, and systematic investigations rely on transparency. This overarching logic can be captured via the truism: 'sunlight is said to be the best of disinfectants'. This is the oft-quoted judgment by Supreme Court Justice Louis Brandeis, in a 1913 Harper's Weekly article titled 'What Publicity Can Do'. And yet, whilst these systems are widely established, our understanding of their effectiveness is somewhat underdeveloped. Whilst it is common to highlight countries exhibiting strong or weak practice (Mendilow & Phélippeau, 2018; Norris, 2017; Norris & Abel van Es, 2016), relatively little attention has been paid to examining the degree to which the strongest transparency regimes deliver meaningful insights. It can therefore often be unclear whether 'good' transparency systems are delivering information in line with democratic norms, and whether transparency regimes remain robust in the face of wider societal change.

Such questions are vital for ensuring that disclosure continually delivers the stated desires of promoting accountability, reducing corruption, and increasing trust.

In the context of elections, transparency (or publicity) performs two functions. First, it is suggested that transparency promotes accountability and ensures that politicians are less likely to engage in unethical or outright corrupt behaviour. By rendering information publicly available for scrutiny (either by voters themselves, or by actors working on their behalf), transparency offers an oversight mechanism, increasing the risk of a corrupt public servant being caught by increasing observations of their actions (Gerring & Thacker, 2004; Kunicová & Rose-Ackerman, 2005; Rose-Ackerman & Palifka, 2016). Given the rapidly evolving nature of campaigning practice, transparency in this context helps citizens to understand what campaign actions politicians are investing in. In turn this can help to disincentive expenditure on duplicitous activities and promote the idea of free and fair elections.

The second potential function of transparency is to increase trust in politics. Citizens, so the argument goes, gain a better knowledge of how politics works, and as such gain confidence in democratic institutions and the general functioning of democracy (Cain et al., 2001; Department for International Development, 2015; Pinto, 2009). It also allows voters to access information which will cause them to 'kick the rascals out', leading to a political elite populated by those with high morals and integrity (Ferraz & Finan, 2008). However, some have cited the potential for a drip-feed of scandal to increase citizen distrust, apathy, and lead to a decline in participation in the form of, for example, lower turnout (Fisman & Golden, 2017, p. 209; Hough, 2013, p. 101). Despite these concerns, transparency is often seen to contribute to the notion of an informed citizenry and help to reassure citizens that free and fair elections occur.

In this paper, we take the view that increased transparency (with caveats) is important despite the potential for a lack of trust in the system. Discussions about the effects of transparency often treat the concept as vague and capacious. Indeed, Dommett (2020) has shown that there is often imprecision in calls for transparency (i.e. it is often unclear what is actually desired, and how any stated impacts can be secured). Noting this tendency we contend that it is not enough to simply say that a regime is transparent, or indeed, 'effectively world leading' (Power, 2020). Instead we should assess the process and content of existing disclosures, to better understand what information is being made transparent, and whether said disclosures perform their functions. Only then can we begin to broach the question of how any desired impacts can be secured.

Case Study: The UK Political Finance Regime

Within this paper, we examine the system of financial transparency that surrounds the UK general election. This focus departs from a tendency to examine 'bad' cases (see for example Agbaje & Adejumobi, 2006; Daniels et al., 2020), and instead seeks to interrogate a system seen to be 'world-leading' (Power, 2020) (in the tradition of, for example, Coglianese, 2009; Green, 2014).

The current regime, set out in the Political Parties, Elections and Referendums Act 2000 (PPERA), is overseen by the Electoral Commission, who host a public archive and publish analysis of spending returns. This disclosure regime provides information about resources and spending, and gathers data on any donations to a political party,

non-party campaign or candidate. Information is also available about spending at elections by both parties and non-party campaigners, with invoices or receipts for payments above £200 available for download from the public archive. Importantly for our purposes, unlike other equivalent spending regimes (such as the U.S.A.), the UK Electoral Commission make the invoices publicly available in an online database.[1]

Political parties, candidates, and third parties must all report any spend during election periods (up to 365 days before the election), and include invoices for anything over £200. These invoices are made available as pdfs on the public system – accessible through the UK Electoral Commission's website. As such it is possible to open each invoice and identify the service declared. At present, the information provided by parties about their electoral spending is classified under one of nine descriptive headings.[2] These are: Advertising, Campaign broadcasts, Manifesto or referendum material, Market research/canvassing, Media, Overheads and general administration, Rallies and other events, Unsolicited material to electors and Transport. These headings provide a broad overview of the different kinds of activity that money is spent on. In addition, disclosures list the supplier who provided those services.

Despite its world leading status, there are signs that the UK's system of electoral transparency is not currently operating as desired, rendering this case of particular interest. Indeed, survey data collected by the Electoral Commission found that a majority of citizens disagree with the statement that 'spending and funding of political parties, candidates and other campaigning organisations at elections is open and transparent' (52%), as opposed to just over one in ten who agreed (The Electoral Commission, 2022). The same survey shows that a plurality of respondents (41% vs. 18% who agree) also disagree with the statement that they 'could easily find out how much political parties, candidates and other organisations spent on campaigning and how they were funded' (The Electoral Commission, 2022). Such figures suggest that voters, whether their perceptions are accurate or not (see vanHeerde-Hudson, 2011; van-Heerde-Hudson & Fisher, 2013), do not deem existing disclosure arrangements to be sufficient.

Given this evidence of disquiet, we pose the question: 'How informative is the UK's system of electoral finance disclosure as it relates to party spending at general elections?' To address this we consider two elements of the transparency regime. First, we explore the *process* through which disclosures are made, concentrating on the degree to which those providing information do so in a way that advances as opposed to frustrates understanding. Our analysis determines the degree to which transparency disclosures allow observers to understand the activity being paid for. Specifically, we find evidence of a range of barriers to insight, including a large number of unclear invoices which, for different reasons, inhibit transparency goals. Second, and building on this analysis, we consider the degree to which the activity classifications used within the existing Electoral Commission disclosure regime accurately capture the precise activity being paid for. Building on this analysis we make a further point relating to process. By comparing the categorisation of activity parties *provide* to the Electoral Commission (selecting from a predefined list of 10) with the description of activity *within* each invoice, we reveal inconsistencies in how the same activity is being declared. Collectively, these findings raise questions about the utility of the current disclosure regime.

Method

To achieve a more detailed picture of how parties spend their money we examined spending returns for the 2019 general election. Specifically, we looked at national spend (as opposed to candidate spend), made by political parties (as opposed to non-party campaign groups). Adopting this focus, we identified 22,720 separate items of expenditure – inclusive of 6396 invoices. In an initial sift we included only suppliers on which over £1000 had been spent. This reduced the numbers of invoices we had to hand-code to 5770, whilst still allowing us to analyse £49.9 m out of an overall £50 m (party) spend at the election.[3]

Opening each invoice in turn, we sought to inductively interpret the items of spending listed within each invoice. Where the information presented on an invoice was insufficient to identify the exact services which were being provided, we coded that invoice as 'completely unclear'. Where a description was provided, we assigned an inductively generated code that captured the listed activity. Simple rules for coding were established, such as conducting exhaustive coding (i.e. coding each separate item mentioned in an invoice – meaning multiple codes could be assigned for one invoice) and non-duplicative coding (i.e. not assigning the same activity within an invoice more than one code).

To generate a consistent and encompassing list of codes, we worked as a team of four coders to formulate a new framework. Initially taking a sub-sample of our overall dataset, we each independently coded 200 items of expenditure to develop a list of codes. By comparing and contrasting the descriptors applied to the same invoices, we generated an initial list of categories. These were then applied to a second sample of 200 new invoices, and the consistency of coding was compared, with any disagreements discussed and reconciled in a 4-way conversation, and any new codes added as required. This process led us to identify a standard set of 50 categories (9 main codes, and 41 sub codes nested under these). This list was then used to classify the entire database (see Appendix 1). Each invoice was opened and coded by two coders. To check inter-coder reliability, we allocated approximately 20% of each coder's invoices to another team member to measure consistency. The Cohen's Kappa score for each pair of coders was at no point below $\kappa = 0.709$, indicating a high degree of internal reliability.[4]

Findings

The Process of Electoral Campaigning Disclosure

In a world-leading transparency regime, the invoices provided to the Electoral Commission should contain sufficient information to allow classification of the type of activity money is being spent on. Only with such information can corrupt practices be uncovered, accountability advanced and citizen trust promoted. Within our dataset, however, we found that 755/5,770 (13.08%) of our invoices could not be coded. These invoices account for £6,628,924 (or 13.7 per cent) of total spend, making it unclear what over 1 pound in every 10 was spent on.

Looking in more detail at why invoices could not be coded, we identified a number of different reasons. In some instances a code could not be assigned because it contained little information about the activity supplied. At times the description was incredibly vague, with an invoice for £60,000 listing simply 'Provision of services'.[5] Other invoices

simply lacked a description,[6] or exhibited formatting issues. Indeed, in one invoice the description of the service was obscured by a post-it note,[7] and in others the scanned invoice was blurry or distorted.[8] Other invoices could not be coded because of (by accident or design) human error. In some instances an item of spending was listed in the Electoral Commission database but an invoice had not been uploaded and hence could not be categorised. In others, the document linked to a blank page, and in some cases the wrong invoice had been submitted.

A final problem we encountered was with the system itself. Our process allowed us to delineate between types of spending from the same supplier. So, if a company provided multiple services (e.g., consultancy, campaign material printing and advertising) we could assign spend to each category. However, at present, a party submitting invoices can only select one of the pre-existing categories (e.g., overheads and general administration *or* advertising). In the case where a supplier provided multiple services, but where some of the spend was under £200, it was not possible for us to assess what service was provided.[9] In these cases, spending could only be categorised as 'unclear'. This was not an issue for those companies that provided only one service, as we could be reasonably confident that the services provided that were under £200, were the same as those invoiced for over £200.

The primary reason for a lack of clarity, was 219 invoices that were not uploaded by the Conservative Party regarding spending on Conservative Party Constituency Associations (all over £200). This apparently internal transfer of cash was not formally documented by the party, making it unclear what exact services they were paying Conservative Constituency Associations to perform (see also Bychawski, 2022).

We can unpick these trends further, by looking at the levels of spend by party, and the percentage of that spend which was classified as unclear. Table 1 shows that the worst performer, by some distance was Plaid Cymru, as all but two of the invoices they submitted were simply blank; such that no information could be gleaned about the service provided. Whilst total Plaid Cymru spend at the general election is dwarfed by the other parties, this shows exceedingly poor transparency compliance. Of the 'big spenders' (i.e. those parties that spent over £1 m), the Brexit/Reform Party and the Conservatives were the two that submitted the highest proportion of unclear invoices. To appreciate the impact of this behaviour it is useful to rely on levels of spend, as opposed to number of invoices/suppliers. As shown in Table 1, this meant that £1,291,487 (25.8%) of Brexit/Reform party spend and £3,683,578 (22.5%) of Conservative party spend could not be accounted for. The Liberal Democrats had 138/374 (36.8%)

Table 1. Unclear spending as a percentage of total election expenditure.

Party	Total spend (GBP)	Total unclear (GBP)	Total unclear (%)	Number of suppliers with unclear spend
Conservative	16,364,448	3,683,578	22.5%	274
Labour	12,196,692	1,159,863	9.5%	42
Liberal Democrat	14,303,617	404,110	2.8%	138
Scottish National Party	989,331	6,463	0.7%	6
Green Party	439,302	72,462	16.5%	13
The Brexit Party	5,014,949	1,291,487	25.8%	44
Plaid Cymru	176,937	169,107	95.6%	22

suppliers where some form of spend could not be categorised, yet the total unclear spend was £404,110 (or 2.8% of total spend). On the other hand, Labour had just 42/263 (15.9%), where the total unclear spend was £1,159,863 (or 9.5% of total spend).

This data suggests that the existing system of disclosure does not always provide informative insights, and that parties are responsible (albeit to different degrees) for this lack of information. Given the apparent need for citizens and other observers to be able to gather information about the conduct of elections and electoral activity, our findings suggest that enforcement action to compel informative disclosure needs to be taken against some actors to ensure more accurate information is available.

The Content of Disclosures

To consider our second aspect of the disclosure system, we focused on the degree to which provided invoices offer details about the kind of activity parties are paying for. This revealed important insights about content, but also further deficiencies in the process of disclosure. To gain this understanding we inductively coded the type of activity described in each invoice. Presenting our findings we, first, discuss the degree to which the existing disclosure regime is able to capture the activities we identified. We then compare our categories to disclosures made to the Electoral Commission to assess the consistency with which the Commission's present labels are being applied.

The Electoral Commission's invoice classification system makes it possible to gain a broad appreciation of the kind of activity that political parties spent money on at the 2019 general election (Table 2). Their data reveals the dominance of spending on unsolicited material to electors, advertising and market research. Indeed, it reveals that 40.9 m (82%) of total campaign spend was classified under these three headings. Beyond these headline classifications, however, these labels offer little information about the precise type of activity being conducted. It is unclear, for example, what form of unsolicited material or advertising is being paid for. In light of concerns about spending on, for example, potentially problematic forms of social media advertising, this data is relatively uninformative as it is not possible to determine the amount being spent on such advertising forms.

Whilst one can search the Electoral Commission database for specific providers – something the Electoral Commission itself did to determine social media advertising spend on Facebook, Google and other social media companies (Electoral Commission, 2018) – this information is limited as it does not capture social media advertising via third parties (Dommett & Power, 2019). For this reason we inductively coded the

Table 2. Spend declared under each of the Electoral Commission's categories.

Category	Total (GBP)
Unsolicited material to electors	20,529,917
Advertising	13,983,659
Market research/canvassing	6,409,704
Overheads and general administration	3,079,155
Rallies and other events	2,313,384
Transport	1,573,460
Media	972,223
Campaign broadcasts	760,926
Manifesto or referendum material	434,684

Table 3. Spend as categorized through our coding process.

Our categories	Our total (GBP)
Campaign materials	21,552,179
Advertising and press	10,440,145
Completely unclear	6,628,924
Research	4,071,430
Data and infrastructure	2,022,103
Production services	1,270,696
Miscellaneous	1,120,894
Consultancy	1,164,009
Campaign activity	86,050

activity described within each invoice, producing 50 codes: 9 overarching categories and 41 subcategories (see Appendix 1 for a full table of categories and sub-categories). To gain an initial impression of the alignment of our categories with the Electoral Commissions, we ranked each category by total spend classified under each heading (Table 3).

Despite a difference in approach, our coding reveals some similarities between our inductive coding and parties' own categorisation under Electoral Commission categories. In particular the top two categories for both approaches are unsolicited material to electors and advertising (Electoral Commission) and campaign materials and advertising and press (our coding), codes which are broadly analogous. This suggests that the political finance database is (somewhat) adequately capturing the predominant form of spending at UK general elections. However, it is presently unclear what precise activities are being declared under the Electoral Commission's headings. This kind of insight can be gathered through our coding framework, and specifically through the sub-categories we identify.

A More Granular Insight

Underneath the 9 codes we identify, we outline 41 subcodes that provide significantly more insight into the kinds of activity parties spent money on at the 2019 election. Table 4 presents the ten most commonly assigned sub-categories (not including unclear invoices) and offers more granular insight into what activities were conducted. Mirroring above findings, it shows that 'traditional' campaigning techniques dominate spending. Moving beyond these findings, however, it reveals that unsolicited material

Table 4. Ten biggest areas of spend (not including unclear invoices) using our coding model.

Category of spend	Overarching category	Total (GBP)
Paid leaflet delivery	Campaign materials	10,665,842
Campaign material printing	Campaign materials	9,050,868
Social media advertising	Advertising and press	5,757,592
Polling	Research	2,285,037
Online advertising	Advertising and press	1,861,117
Event costs/venue hire	Campaign materials	1,747,774
Newspaper/magazine advertising	Advertising and press	1,381,771
Research	Research	1,191,200
Transport	Miscellaneous	983,763
Video editing/production	Production services	970,534
Total		35,895,498

to electors, or what we term campaign materials involves expenditure on paid leaflet delivery and campaign material printing – with these two activities forming the bulk of spending (and therefore spending at the 2019 general election). Our analysis also advances understanding of what is being declared as advertising, revealing that social media advertising and online advertising were the dominant forms of advertising (featuring as the third and fifth within our top 10 spending categories), whilst newspaper and magazine advertising featured as the seventh most prominent spending subcategory. We also gain more insight into dominant forms of research, with polling featuring as the fourth largest spending category in our subcodes, whilst more generic research services were the eighth largest type of spending.

Our data offers a more granular understanding of the types of activity being conducted as well as the relative prominence of each activity in terms of spend. Although this does not capture all electoral activity (as much campaigning can be done without incurring spend), it provides a useful indicator of the type of activity being conducted by parties in an attempt to win votes. What this information does not provide, however, is a clear sense of whether corrupt practices are evident. Although it is possible to identify the degree to which potentially concerning practices are being used (i.e. social media advertising), this data alone does not allow an assessment of whether parties are engaging in corrupt practice. There are accordingly limitations to both the Electoral Commissions categories and our own in terms of this data's ability to uncover problematic practice and promote public trust.

In recognising these limitations, we also suggest that our coding categories highlight a further limitation in regards to the *process* of disclosure under the current regime. In essence, we suggest that by comparing our more detailed categorisation of supplier activity with the category chosen when an invoice is declared to the Electoral Commission, we can determine whether the Commission's categories are being consistently applied. To these ends we consider the classification of invoices under our two top-spending categories (campaign materials and advertising and press), comparing each approach.

Consistency of Campaign Spending Disclosure Categorisation

As we have previously suggested, our campaign materials category is closely aligned to the Commission's category of unsolicited material to electors. However, what is presently unclear is whether parties are declaring activities consistently. To put it another way, are invoices relating to activities such as campaign material printing or design services being consistently declared under the same Electoral Commission category (which we would expect to appear under unsolicited material to electors). To consider this question we examine the classification of each of our subcodes under this heading (Table 5) against the Electoral Commission's classification (Figure 1).

Comparing our classifications, Figure 2 shows that parties are not coding the same activity (or rather activities described in invoices in similar terms) in a consistent way under the Electoral Commission's headings. Taking the generic heading first, we see activity that we classify as campaign materials being recorded by parties as advertising, overheads and general administration and rallies and other events, with only a fraction being coded as unsolicited material to electors. In a similar manner, what we see to be

Table 5. Subcategories for the 'campaign materials' category.

Subcategory	Description of service	Spend (GBP)
Paid leaflet delivery	Delivery of a tranche of materials to specific addresses	10,665,842
Campaign material printing	Printing of materials containing information about the campaign itself (such as leaflets, poster boards and correx boards).	9,050,868
Event costs/venue hire	Venue hire for a rally, or other events that relate to campaigns more generally	1,747,774
Design services	Design of resources, such as leaflets, manifestos or other mentions of 'design' work	75,208
Campaign materials	Where services fell under the general category of 'campaign materials'	50,357
Translation/Braille/British Sign Language	Translation services are employed, whether for leaflets, manifestos or during a rally/speech	41,562
Creative content owned by a third party	Third-party content (such as Getty Images or demo music)	41,034

invoices relating to design services are currently being declared as advertising, manifesto or referendum material, overheads and general administration and unsolicited material to elections. Although some categories are being more consistently coded i.e. paid leaflet delivery, where 71.46% (48/67 of entries) is coded as unsolicited material to electors, other categories are being assigned to invoices which we judge to be doing the same service.

A similar finding emerges when we look in detail at spending declarations under the heading advertising and press, which is closely related to the Electoral Commission's category advertising in the political finance database. Our coding process identified 7 distinct activities under this heading (Table 6).

Comparing the classification of these activities to the categories assigned to invoices in the Electoral Commission's data (Figure 2), we see less variation. This is especially in terms of the top three categories of social media advertising, online advertising and newspaper or magazine advertising. None of these dip below 85% in terms of level of

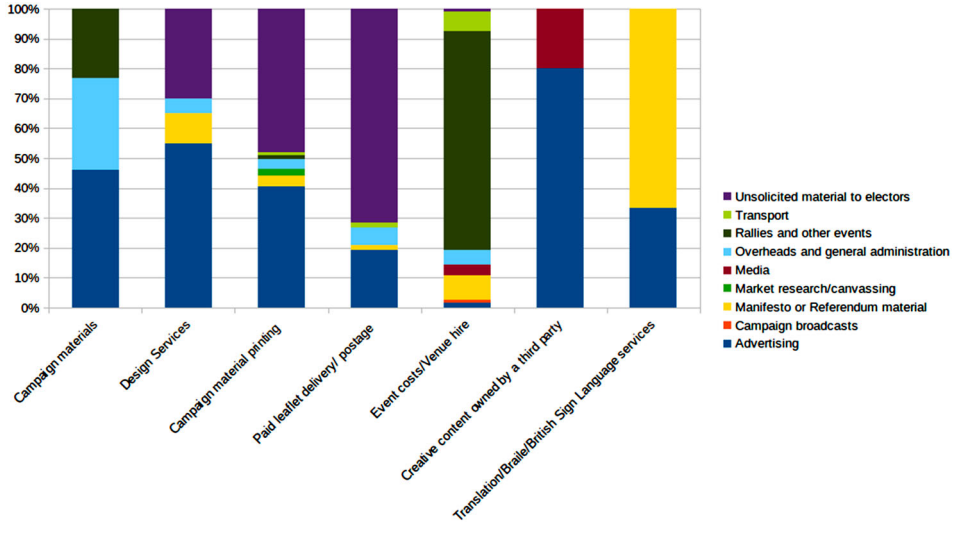

Figure 1. A comparison of campaign material coding with the political finance database.

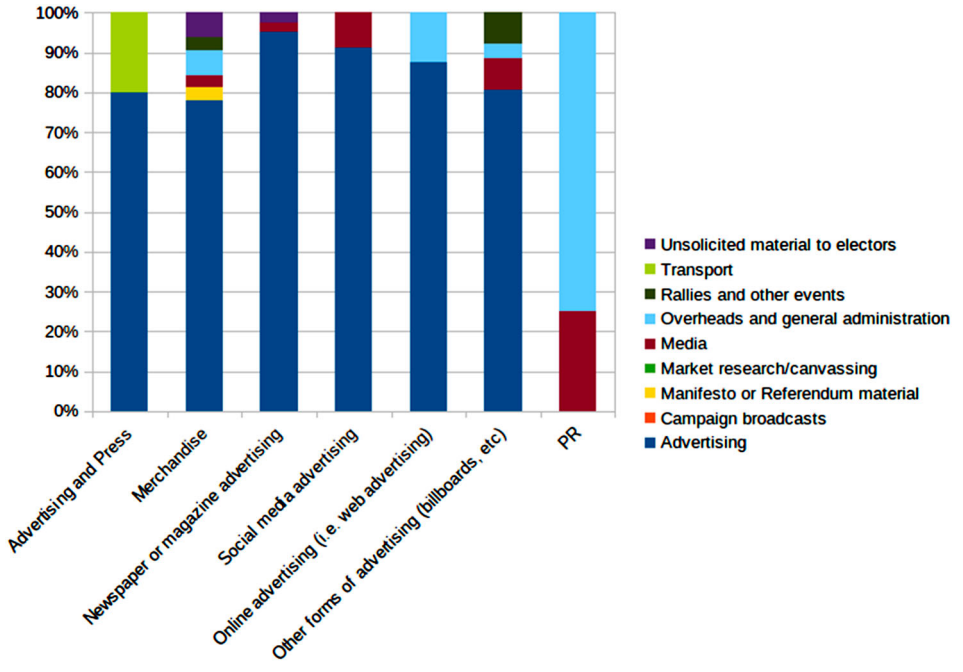

Figure 2. A comparison of advertising and press coding with the political finance database.

agreement with the 'advertising' label in the political finance database. PR, on the other hand, is entirely captured by other labels, with advertising and press and merchandise falling at around 80% agreement.

These two categories are illustrative of broader trends we find within the entire dataset – political parties are not consistently declaring the same (or, rather, what our coding suggests to be the same) activity under one Electoral Commission heading. It is therefore the case that payments are being classified inconsistently in disclosures to the Commission. Moreover, the current system of disclosure in the political finance database does not provide much granular detail about areas of concern. Returning to our central focus on transparency, a lack of consistent classification and important detail about what spending actually entails creates significant challenges for any attempt to identify examples of corrupt behaviour, advance accountability and promote trust.

Table 6. Subcategories for the 'advertising and press' category.

Subcategory	Description of service	Spend (GBP)
Social media advertising	Paid adverts placed on social media platforms	5,757,592
Online advertising	Generic paid web adverts	1,861,117
Newspaper or magazine advertising	Paid adverts in national or regional news outlets	1,381,771
Advertising and press	Where services fell under the general category of 'advertising and press'	579,500
Other forms of advertising	Paid advertising in a form that doesn't necessarily fit the above categories (e.g., 'ad vans' and paid billboard adverts)	545,955
Merchandise	Production of campaign bric-a-brac such as boxing gloves, umbrellas, wrapping paper	302,183
PR	Paid public relations content and advisers	23,475

Discussion

In light of the above findings, our analysis suggests that the UK's system of electoral finance disclosure as it relates to party spending at general elections displays a number of deficiencies. Whilst in ideal terms the information declared to the Electoral Commission should be a means by which to identify and prevent corruption, advance accountability and enhance public trust, our analysis has shown available data is not informative, making it difficult to achieve these goals. Specifically, we have highlighted two types of limitations within the data that we describe as *process* and *content* issues.

First, in regards to *process* concerns, our analysis of the Electoral Commission disclosure system has shown recurring issues with the way that data is (or is not) provided. Specifically, our analysis found that £6.6 m of the spend reported to the Commission could not be scrutinised because of problems with the existing system of disclosure. We found instances of missing invoices, incorrect invoices, blurred invoices and many other practices which made it impossible to examine in detail what money was spent on (beyond using the current Electoral Commission categories or making inferences based on supplier name). It is not possible to determine whether these practices were the result of genuine human error, or are a form of what we term 'malicious compliance'; whereby practitioners comply with the letter but not the spirit of the law in submitting information returns. Whatever the cause of these unclear returns, they pose significant issues for attempts to understand and study elections. In addition, our own coding of available invoices revealed an inconsistency of how apparently the same activity described in invoices was being declared under different Electoral Commission headings by political parties. We therefore found that invoices relating to campaign material printing were classified as, for example, advertising or unsolicited material to electors. There accordingly appeared to be little consistency in the way that information is being provided, making it difficult to draw comprehensive or reliable insights from data in the public realm.

Second, in relation to the *content* of disclosure, our new coding model showed that it is possible to gain more detailed insight into the current activities parties are spending money on at elections. We can therefore use invoices to identify the specific types of activity being conducted and the relative prominence of each technique. Although helping to build up a picture of the dynamics of modern campaigns there are, however, many questions which remain unanswered. An analysis of invoices can, for example, reveal social media advertising spend, but invoices do not reveal exactly which adverts were being bought, how these were targeted and what content they contained – making it impossible to determine if problematic techniques were used in the deployment of this tool. Similarly, whilst we can identify consultants working for parties, invoices contain often at best limited information about the services consultants perform and the strategies they promote. When it comes to understanding the dynamics of modern election campaigning it is therefore clear that there are many things we do not know, even in a world-leading disclosure regime.

These deficiencies are particularly problematic given the apparent goals of political finance transparency. As outlined at the outset of this article, transparency is seen to be a key tool for promoting democratic governance and is particularly seen to be a means

by which to promote accountability, prevent corruption and enhance public trust. Our analysis has shown that the Electoral Commission's disclosure system contains only limited information about political parties' conduct at election campaigns because of the above problems with the process and content of disclosure. This means that it is difficult to envisage using this data to identify evidence of corruption and hold those responsible for problematic practices to account. Furthermore, it is not clear how this information would affect public trust as many questions remain about what exactly it is that parties are spending money on. Yet even these outcomes are uncertain. As our analysis has shown, the process of extracting insight from the Commission's online finance system is a time consuming and onerous affair. The prospect of individual citizens engaging in this kind of research is remote. This makes investigation by academics and journalists vitally important. That said, even if such efforts occur, the likelihood of findings cutting-through to inform public debate is slim as in a crowded media landscape, it is often challenging for all but the most sensationalised stories to gain coverage. Our analysis therefore raises fundamental questions about the degree to which the UK's system of electoral finance disclosure is only informative, but also about its value within a democratic society. In essence, it is unclear who these transparency mechanisms are *for*, *what* they are trying to achieve, and whether this data can be used effectively to deliver desired goals? In particular, it is unclear how this information is consumed by or likely to effect citizen attitudes, suggesting a need for further research to explore these themes (along the lines of, for example, vanHeerde-Hudson, 2011; vanHeerde-Hudson & Fisher, 2013).

Whilst raising these reservations, we do suggest that there are a number of ways in which the current system of financial disclosure in the UK could be improved. In the first instance, these issues suggest a need for greater standardisation of practice in invoice disclosure. This recommendation mirrors existing calls for 'standardised disclosure forms' in the US (Heerwig and Shaw 2014) or 'common accounting practices' in the UK (Power, 2020), that aim to reduce variation in the information released. While at present in the UK, the Electoral Commission (2019, p. 27) states that invoices need to record 'what the spending was for – for example, leaflets or advertising', this research has shown that this is not followed and that there is not clear guidance for newer digital methods. A standardised disclosure practice would also allow for the potential of adopting machine learning techniques for the analysis of invoices. At present invoices can come in almost any form, from broad (uninformative) handwritten receipts to forensically detailed breakdowns of precise spend. This makes it very hard to develop a successful machine learning model that can interpret these invoices. Other process-focused interventions could also be made. The Electoral Commission could provide increased guidance on the scope of disclosure categories – explicitly listing how invoices pertaining to particular activities should be classified. When it comes to content, more detailed descriptions could be required that allow observers to appreciate the precise activity money is being spent on. Whilst not addressing the more fundamental questions about the impact and purpose of disclosure, we suggest that these changes could deliver valuable information.

Conclusion

In this paper we posed the question: 'How informative is the UK's system of electoral finance disclosure as it relates to party spending at general elections?'. Analyzing

returns from political parties following the 2019 general election, we have argued that the current system of financial disclosure does not adequately meet the requirements of an effective transparency regime in terms of both process (i.e. how information is disclosed) and content (i.e. what information is disclosed). We have demonstrated this via an innovative coding model of the 5770 invoices that political parties uploaded to the Electoral Commission's political finance database.

As it currently stands, voters can only reasonably expect to discover a limited amount of information – leaving it to journalists, academics and interested observers to fill in the gaps. Even then, there is a significant black box in terms of what we know about election spending. This is particularly as it relates to the process of disclosure. It is unclear how £6.6 m at the 2019 general election was spent. Reform should focus on a review of the existing categories (which do not provide a full picture of election activity, particularly as it relates to data-driven campaigning) and advocating for a standardisation of invoicing to implement common accounting practices (for both political parties and non-party campaigns). This will allow for more immediate detail in terms of what services companies and suppliers are performing, and provide a genuine opportunity for machine learning and near real-time analysis of election spending returns. Beyond these changes, however, we suggest there is also a need for a more far-ranging re-examination of the goals and impact of transparency disclosure that considers when, how and in what form transparency informs citizens' experience of modern elections.

In regards to voter experience, our study suggests there are signficant problems with a system of information disclosure intended to provide insight into how modern election campaigns are being fought. Voters are not, therefore, able to easily access information about the efforts being made to secure their vote, and nor can they rely on intermediaries to provide information by drawing on this resource. This means there is considerable potential for voters to lack understanding of modern election campaign activity and to accordingly have concerns about the methods used in attempts to win their vote. Whilst for some electoral transparency may not appear a priority, we suggest that problems with these systems can accordingly have long term implications for the voter experience and, as such, electoral democracy.

Notes

1. The Electoral Commission database can be found here: http://search.electoralcommission.org.uk/Search/Spending?currentPage=1&rows=10&sort=DateIncurred&order=desc&tab=1&open=filter&et=pp&includeOutsideSection75=true&evt=ukparliament&ev=3696&optCols=CampaigningName&optCols=ExpenseCategoryName&optCols=FullAddress&optCols=AmountInEngland&optCols=AmountInScotland&optCols=AmountInWales&optCols=AmountInNorthernIreland&optCols=DateOfClaimForPayment&optCols=DatePaid
2. The category which is assigned to a given case of expenditure is the responsibility of the party when declaring their spending. This means that different parties procuring the same service (even from the same supplier) may be categorised differently on the Electoral Commission database.
3. We analysed £49,904,074.11, as compared with £50,057,203.83 – a deficit of £153,129.72
4. The full breakdown of the Cohen's Kappa scores can be found in Appendix 2
5. For example see: http://search.electoralcommission.org.uk/Api/Spending/Invoices/65307.
6. For example see: http://search.electoralcommission.org.uk/Api/Spending/Invoices/67188; http://search.electoralcommission.org.uk/Api/Spending/Invoices/68473.

7. See: http://search.electoralcommission.org.uk/Api/Spending/Invoices/71362.
8. For examples see: http://search.electoralcommission.org.uk/Api/Spending/Invoices/64590; http://search.electoralcommission.org.uk/Api/Spending/Invoices/68079; http://search.electoralcommission.org.uk/Api/Spending/Invoices/71362.
9. Invoices are not provided for spend under £200.

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Appendices

Appendix 1. List of codes applied to dataset

Advertising and press	Invoices which referred to advertising activity (either in newspapers, online or elsewhere) or press services such as public relations
• Advertising and press	Where service fell under the general category of 'advertising and press'.
• Merchandise	Production of campaign bric-a-brac such as boxing gloves, umbrellas, wrapping paper, badges, rosettes and balloons
• Newspaper/ magazine advertising	Paid adverts in national or regional news outlets (either in print or online versions).
• Social media advertising	Paid adverts placed on social media platforms (for example on Facebook, Instagram or Snapchat)
• Online advertising	Generic paid web adverts
• Other forms of advertising	Paid advertising in a form that doesn't necessarily fit into any of the above categories and includes the use of 'ad vans' and paid billboard adverts.
• PR	Paid public relations content and advisors
Campaign materials	Invoices which referred to the physical objects used for campaigning, or tangible events (e.g., rallies) or processes (e.g., mailing leaflets) related to campaigning more generally. The campaign materials group has six sub-categories.
• Campaign materials	Where service fell under the general category of 'campaign materials'.
• Design services	Design of resources such as leaflets, manifestos, or other mentions of 'design' work
• Campaign material printing	Printing of materials containing information about the campaign itself (such as leaflets, poster boards and correx boards). Payment for the photocopying of leaflets is also included in this category.

(*Continued*)

Continued.

Advertising and press	Invoices which referred to advertising activity (either in newspapers, online or elsewhere) or press services such as public relations
• Paid leaflet delivery/postage	Delivery of a tranche of materials to specific addresses. This category did not include general delivery of goods/campaign materials to constituency offices or campaigners addresses.
• Event costs/venue hire	Venue hire for a rally, or other events that relate to campaigns more generally.
• Creative content owned by a third party	Third party content (such as Getty Images or demo music)
• Translation/Braille/ British Sign Language	Translation services are employed, whether for leaflets, manifestos or during a rally/speech
Campaign activity	Invoices relating to the *process* of campaigning (i.e. encouraging people to vote) as opposed to the specific materials used. This group has three sub-categories.
• Campaign activity	Where service fell under the general category of 'campaign activity'.
• Fundraising	Activity specifically designed around raising further funds for the campaign itself
• Phonebanking	Activity specifically referring to the use of phone banks to canvass support
Production	Invoices referring to production contained services related to the creation of campaign content for wider dissemination (e.g., party election broadcasts and Facebook videos). This group has three sub-categories.
• Production	Where service fell under the general category of 'campaign activity'.
• Video editing/production	Video related editing and production
• Audio editing/production	Audio related editing and production
• Photo editing/production	Photo related editing and production
Research	Invoices relating to research contained activity designed to allow parties to gather intelligence during (and prior to) campaigns. This group has six sub-categories.
• Research	Where service fell under the general category of 'research'.
• Polling	Fielding and/or reporting of opinion polls
• Focus groups	Research organisations to conduct focus groups
• Ordinance survey data	Data specifically supplied from ordinance survey for campaign activities
• Message testing	Campaign message testing services, or accommodate message testing more generally
• Archival research	Historical and archival research
• Other forms of research	Paid research that doesn't fit into the above categories (e.g., NHS data extraction)
Data and infrastructure	Invoices referring to the use of technology in driving campaign mechanisms including infrastructure, data analysis and website services. This group has seven sub-categories
• **Data and infrastructure**	Where service fell under the general category of 'data and infrastructure'.
• Campaign database or CRM	Customer relationship management services or databases such as contact creator, nationbuilder and voter vault
• Data services and analysis	Data management, data analysis, list building, data collection, voter file matching and identity resolution/data matching
• IT infrastructure and support	Software, software development servers, cloud computing and the purchasing of desktop and laptop computers
• Telecommunications services	Purchase and upkeep of telecommunication systems.
• Mobile application services	Development for mobile phone apps for political parties and campaigns
• Email services	Upkeep of email servers
• Website services	Update and development of websites
Consultancy	Invoices coded under this category referred to services on strategy, management or consultancy. This refers to instances in which actors are giving strategic advice (as opposed to delivering content or services). This group has four sub-categories.
• Consultancy	Where service fell under the general category of 'consultancy'.
• Communication consultants	Strategy and advice around video, online or offline communications
• Design consultants	Strategy and advice around the design of certain materials and messages
• Social media strategy and consultancy	Strategy and advice is given specifically as it relates to social media plans
• Data consultancy	Strategy and advice given around the utilisation of data in campaigns
Miscellaneous	
Unclear	

Appendix 2. Cohen's Kappa of inter-coder reliability.

Pairs of coders	Cohen's Kappa (K)
Coders 1 & 2	$K = 0.908$
Coders 2 & 3	$K = 0.866$
Coders 3 & 4	$K = 0.780$
Coders 4 & 1	$K = 0.709$