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Making elections more transparent? Lessons from the implementation of digital imprints at the 2024 UK General Election

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ABSTRACT

Transparency has often been proposed as a solution to the use of digital technology in election campaigns, being seen to counter negative democratic effects. And yet, few studies have documented how transparency reforms are being enacted in practice. Drawing insight from research on the implementation of digital regulation, in this paper we consider how democratic actors comply with new transparency requirements. Adopting a case study approach, we examine the implementation of the UK's new "digital imprints" regime. Auditing practice at the 2024 General Election, we find that although technical compliance is possible, there is considerable diversity in practice, with platform affordances and actors' choices affecting compliance. Providing recommendations for UK regulators, we suggest that digital regulation is unlikely to be effective without concerted efforts from regulators to shape implementation and compliance.

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Transparency; disclosure; digital; imprints; regulation; implementation; election campaigning; UK

Introduction

Online campaigning plays a significant role in political parties' campaign arsenal, with platforms such as Facebook, X (formerly Twitter), TikTok, LinkedIn and WhatsApp being used to spread paid for and organic content by political actors (Jungherr et al. 2020). Often less regulated than its offline alternatives, digital media is seen to facilitate unmediated contact between citizens and political campaigners, allowing more direct and personalized contact than ever before (Harker 2020, 155–156). Digital is also seen to raise new challenges for electoral integrity and administration, prompting concerns about mis- and dis-information, deep fakes and inauthentic content which have prompted calls for regulation of online campaigning (Kundnani 2020). One particular focus of policymakers has been "growing concerns regarding the transparency of digital campaign material, which is threatening to have a negative impact on trust in the integrity of our electoral system" (Cabinet Office 2021, 6). These concerns have

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been voiced in a range of international contexts, leading to calls for, and some attempts to enact, an increase in the transparency of digital campaigning online (European Commission 2024; Heinmaa et al. 2023; Kofi Annan Foundation 2020).

In evaluating the likely effectiveness of efforts to improve transparency, to date scholars have focused on citizens' responses to transparency stimuli (Binder et al. 2022; Binford et al. 2021; Dobber et al. 2023; Jost et al. 2022; Kruikemeier, Sezgin, and Boerman 2016; Stafford et al. 2024). Research has examined how adding alternative styles of disclosure statements to campaign material – whether offline or online – affects citizens' attitudes and behaviours. Whilst generating important insights into the potential impact of increased transparency, limited attention has been paid to the practical implementation of digital disclosure requirements. It is therefore currently unclear whether and how disclosures are being enacted by political campaigners, and whether all campaigners comply consistently across different online spaces. Such questions are vital for evaluating the likely impact of disclosure requirements, but also for understanding how to best design and support the implementation of disclosure regimes online to deliver desired effects.

This article provides empirical evidence on the practice of compliance, offering, to our knowledge, the first analysis of transparency disclosure implementation. In doing so we provide insight into the challenges of implementing and enacting reforms and recommendations for policymakers seeking to promote compliance. To focus our study, we examine the implementation of what are known as “digital imprints” in the UK. Coming into force on 1st November 2023, the Elections Act 2022 extends an existing requirement for offline campaign material to contain details of who printed and promoted any piece of content. Like many disclosure requirements found in other national jurisdictions, the UK's digital imprints are “designed to make it clear to the public which person or organisation is responsible for promoting an advert” (Gordon 2024). Our analysis investigates compliance with this requirement at the 2024 UK General Election campaign. Manually auditing campaign material on Facebook, X, TikTok and Instagram, we examine how national political parties, local parties, candidates, and non-party campaigners implemented digital imprints. We find evidence that whilst compliance with digital imprints guidance was technically possible, it was by no means widespread, with imprints either entirely absent, or implemented in ways not fully compliant with guidelines. We also find that practice varies across platforms, and that actors are implementing guidance in substantively different ways. These insights are relevant not only to regulators in the UK, but are important for international efforts to enact effective digital transparency regulation. They suggest that the process of delivering meaningful transparency is not only contingent upon successful design, but also on effective implementation on the ground. Making recommendations for UK policymakers seeking to enhance digital imprints compliance, we aim to foreground questions of implementation within current debates around digital regulation and transparency, arguing they are critical to the success of this policy response.

Digital campaigning and electoral transparency

Digital campaigning is now an established part of modern election campaigns in advanced western democracies. For example, at the 2024 UK General Election political

parties spent over £11.2 million on online advertising on Facebook and Google (Who Targets Me 2024), as well as spreading unpaid organic content on TikTok, Facebook, LinkedIn, Instagram, X and WhatsApp. Whilst increasingly familiar to voters, for many observers the rise of digital campaigning has raised concerns about transparency. The European Commission highlighted how “[e]xisting safeguards to ensure transparency and parity of resources and airtime during election campaigns are not designed for the digital environment” (2020, 2–3), whilst others have pointed to the potential for microtargeting (Harker 2020, 157), misinformation (Bateman and Jackson 2024) or poor data practices (Kuehn and Salter 2020, 2595) to arise from a lack of transparency.

In response, international efforts have been made to promote increased transparency around online election material. Whilst often treated as a panacea, an extensive body of scholarship has sought to reveal the requirements necessary to render transparency meaningful (Bates et al. 2023; Suzor et al. 2019; Geng 2024). To date, much attention has focused on the effects of transparency disclosures on citizens and the impact of design on these effects (Dobber et al. 2023; Kruikeimeier, Sezgin, and Boerman 2016). Dowling and Wichowsky (2013), for example, found that disclosures can help reveal financial interests that signal a persuasion attempt. Others have shown that disclosures, when immediately visible with the content, can impact participant’s awareness that advertising content viewed is designed to be persuasive. For example, an increase in persuasion awareness has been found in response to sponsorship disclosures (Kruikeimeier, Sezgin, and Boerman 2016), as well as demographic and location-based targeting disclosures (Hirsh, Binder and Matthes 2024) – although Dobber et al. (2023) found effects with only some wording conditions. Existing research has also shown that the design of a disclosure matters for its impact on citizens. Following evidence that a proportion of citizens fail to notice disclaimers (Dobber et al. 2023, 18; Jansen and Krämer 2023), scholars have tested effective display mechanisms. Jost et al. (2022), for example, compared three versions of disclaimer on online political advertising and found that more prominent disclosures improved recall and ad recognition. In revealing the impact of disclosures to be contingent on disclosure presentation, the above studies highlight the need for complementary research exploring the practical enactment of disclosure policy – seeking to determine, in essence, whether disclosures are actually being presented in ways able to deliver desired effects.

Looking to research on the enactment of digital regulation, there is a rich body of work that has interrogated the design of regulation and gaps in regulatory approach (Beyersdorf 2019; Borucki and Kettemann 2024; Farrand 2024; Gibson et al. 2024). Of particular interest to this study, there has been some work on the implementation of digital regulation tracking the compliance behaviour of platforms in response to regulatory guidance (Borz et al. 2024; Kirk and Teeling 2022; Le Pochat et al. 2022). For example, Borz et al. (2024) analysed the annual reports of five global platforms (Facebook/Meta, Google, Microsoft, Mozilla, X/Twitter) which were published to signal their voluntary compliance with the EU’s Code of Practice on Disinformation (CPD). The researchers examined reporting practice on different aspects of the CPD (such as “commitments to transparency” and “working with policy stakeholders”) compared to the original legislation, finding an asymmetric responsiveness to policymaker priorities (p.719). Similarly, Kirk and Teeling’s study of platforms’ compliance with the same code at the 2019 Irish Elections found that “[a]lthough Facebook, Twitter and Google did engage with their

commitments under the EU Code of Practice on Disinformation by providing some transparency regarding political advertising, this was incomplete” (2002, 96). In spotlighting platforms’ behaviour these studies have shown the need for tighter regulation, stronger regulatory infrastructure and more effective monitoring to boost compliance (2002). What is less clear from existing work, is how other political actors are reacting to new digital regulations, making it unclear whether they are following regulatory guidelines as intended or whether efforts to improve compliance are required.

It is against this backdrop that we take a similar approach to Borz et al. (2024), aiming to reveal disjunctions between policymaker expectations and practice in the context of disclosure policies. In doing so, we provide insight into how the characteristics of platforms and actors affect the implementation of regulatory guidance, generating new understanding of the degree of compliance and possible reasons for variation from desired standards.

The UK’s digital imprints regime

To consider implementation and compliance, we provide a case study of the digital imprints regime enacted in the UK via the Elections Act (2022). This marked the nationwide adoption of a (subtly different) requirement first implemented in Scotland. First outlined in the Scottish Referendum Act 2013 and applied to the 2014 independence referendum, Scotland’s rules required that “(a) the name and address of the promoter of the material, and (b) the name and address of any person on behalf of whom the material is being published (and who is not the promoter), must be included in the material unless it is not reasonably practicable to include the details’ (Scottish Government 2013, Part 4, 27:6). Evaluating these rules following the referendum in 2014, the Electoral Commission noted that there was “some confusion amongst campaigners and the public about what did and did not require an imprint” (Electoral Commission 2014, 110). And yet, there was no evidence of a systematic analysis of implementation practice in 2014. Even later, when digital imprints were required for local and Scottish Parliament elections (Johnston 2023), analysis of the 2020 local election was limited. Reliant on candidate survey data, the Electoral Commission simply reported that “[n]early nine out of 10 (88%) respondents agreed that they understood the requirement to include imprints on digital campaign material, compared to 5% who disagreed. A smaller majority (72%) agreed that it was easy to meet these requirements, with almost one in 10 (8%) disagreeing” (Electoral Commission n.d.). Our understanding of compliance with digital imprints prior to the 2022 UK Elections Act is therefore limited, as we do not have empirical evidence attesting to the extent to which this requirement was enacted, and whether practice aligned with the specified regime. For this reason we examine the most recent efforts to implement digital imprints in more detail. To enable this, we outline the specifics of this regime.

The UK’s digital imprints regime built on developments in Scotland by stating that all qualifying electoral material should include the name and address of the promoter of the material, and the name and address of any person on behalf of whom the material is being published (and who is not the promoter). This requirement applied to particular forms of campaign material. The Elections Act specified the need to add imprints to “digital material” consisting of “text, moving images, still images, speech or music”

that is published, meaning it is “made available to the public or any section of the public” (Electoral Commission 2023). Two types of criteria determine if digital material required an imprint, with alternative requirements depending on whether the material is a paid advert or not.

For paid advertising, all material that counts as “political material” requires an imprint. Political material describes material whose sole or primary purpose can reasonably be regarded as intended to influence the public, or any section of the public, to give support to or withhold support from a range of actors including political parties, candidates, elected office holders, or outcomes, such as a referendum. For unpaid material, also termed organic material, an imprint must be included if it is election material, referendum material or recall petition material, and is published by or on behalf of a relevant entity such as a candidate or registered party. This means that posts by ordinary individuals would not fall within the imprint regime.

In terms of specifying the presentation of an imprint, the Electoral Commission provided guidelines which state that an imprint “must be in text form, unless it is included as a part of solely audio material where it must be included as audio material. The imprint must be legible, or in the case of audio material, audible, no matter what device is used to access the information” (Electoral Commission 2023). It was also contended that “[i]n order to comply with the law, you must ensure that a written imprint is on screen for long enough that it can be read. Similarly, an audio imprint must be read at a speed at which it can be heard and understood” (Electoral Commission 2023).

Beyond these core requirements, the Electoral Commission acknowledged that the lack of uniformity in online spaces may make uniform guidelines impracticable (as certain social media platforms may not have functionality compatible with compliance). As such, the guidance went on to state that:

[t]he imprint must be included as a part of the material, unless it is not reasonably practicable to do so. Whether it is reasonably practicable to include the imprint as part of the material depends on the technical capability of the platform on which the material is published. It does not depend on, for example, whether including an imprint will affect:

- your preferences about the design or appearance of the material
- how effective you think the material will be
- how much time it will take to publish the material (Electoral Commission 2023)

They continue: “[i]f it is not reasonably practicable to include the imprint as a part of the material, then the imprint must appear somewhere directly accessible from the material. In practice, this means it can be reached via a direct link, usually one click or equivalent, where both the link and the imprint are easy for a voter to locate” (Electoral Commission 2023).

These guidelines indicate that compliance can take different forms if “it is not reasonably practicable” to enact the original guidance, but nevertheless they outline expectations around presence and legibility. In this paper, we explore the degree to which campaigners complied with this guidance, asking: To what extent did campaigners follow the Electoral Commission’s guidance for the formatting of digital imprints? In posing this question our aim is to provide more detailed evidence of compliance than existing discussions of the Scottish digital imprints regime. The analysis presented

below is therefore primarily descriptive, as we explore the extent of compliance across our sample of campaign material and two possible reasons why certain materials fail to comply, namely variation caused by digital platform and type of actor.

Our rationale for considering these two explanations derives from pre-existing research. In terms of platform variation, existing research has shown considerable diversity in the characteristics of online platforms (Bossetta 2018). Platforms have different affordances (Forestal 2022) and, as such, may not be equally amenable to the display of imprints in line with the Electoral Commission's guidance. For this reason we consider whether and how compliance is greater on certain platforms compared to others, posing a second research question to ask: Is compliance with digital imprints guidance consistent on different platforms?

It is also the case that the campaigners active in elections are diverse (Medvic 2021; Scarrow, Webb, and Poguntke 2017). Existing research suggests that, whilst many are solely electorally focused bodies, i.e. political parties or candidates, others have varying degrees of engagement with electoral politics, i.e. non-party campaign groups or interest groups (Dommert et al. 2023). Moreover, these actors can have unequal resources and expertise (Nassmacher 2019), potentially affecting their capacity and incentive to comply. Given previous research has shown that different campaigning actors do not behave uniformly (Dommert et al. 2023), we ask: Is compliance with digital imprint guidance consistent depending on the actor responsible for campaign material?

In posing these three questions, our goal is to understand how implementation practices vary and whether (and in what form) further regulatory interventions could be made to enhance compliance.

Methods

To evaluate the implementation of digital imprints we designed and executed an audit of campaign practice. We initially piloted this at the 2024 Local Elections (findings not reported here). Learning from this exercise, we refined and expanded our initial activity to monitor practice at the 2024 General Election. Given the challenges of gaining access to social media data (de Vreese and Tromble 2023) and the complexity of identifying where and how an imprint was present within campaign material, we were unable to comprehensively or computationally gather and analyse all examples of campaign material. For this reason, we undertook a manual audit of a sample of campaign material.

Building on our pilot research, we collected data from national parties (22), local parties (84), candidates (134)¹ and the non-party campaign groups (58) registered with the Electoral Commission on 4th July.² Each selected social media profile was a public account or page.³ We audited practice on four platforms and in five formats. Specifically, we looked at Facebook adverts and posts, X posts, TikTok posts, and Instagram posts.⁴ Where possible we selected local parties and candidate accounts with social media presence across multiple platforms. Where we were unable to find the same local party or candidate posting on different platforms, we worked to identify an alternative. In some instances, this was not possible as many local parties and candidates were not active on some of our chosen platforms, resulting in slight differences in the sample size across each platform (Table 1). In total, we identified 1,140 accounts posting qualifying campaign material, out of a possible 1,490 (76.5%).⁵ Interestingly, Table 1 shows that most

Table 1. Number of posts gathered from each platform by account type.

		Number of pieces of campaign material gathered on each platform				
Type of Account		Facebook Ads	Facebook Posts	X Posts	TikTok Posts	Instagram Posts
	National Party	22/22	22/22	22/22	7/22	21/22
	Local Party	41/84	84/84	68/84	35/84	57/84
	Candidates	102/134	134/134	134/134	97/134	123/134
	Non-Party Campaign Groups	18/58	45/58	42/58	27/58	39/58
	No. of accounts posting qualifying campaign material per platform	183/298	285/298	266/298	166/298	240/298

of our actors used Facebook posts, but profiles on TikTok and Instagram were less common for all our actors. Our sample is therefore not comprehensive as we do not capture material from every candidate, party or non-party campaign group. Whilst imposing some limitations (see discussion), this approach was necessitated by the need to manually gather data in a short time frame – as we needed to capture posts before pages were deleted or altered post-election.

We collected a single sample of campaign material from each actor in each chosen format, selecting the first post on the eve of poll (3rd July 2024). When an actor had not posted by the end of 3rd July, we selected the most recent piece of campaign material posted in 2024. When identified, posts were screenshotted or linked to and then coded in accordance with the questions below. We worked as a team of 3 coders – two from the original pilot coding team and an additional expert in digital imprints. To verify the consistency of coding, we double coded 10% of content posted by each type of actor on each account. Computing Krippendorff's alpha to measure inter-coder reliability, we achieved a score of 0.84 (with ratings >0.8 deemed to be reliable (Krippendorff 2011)).⁶

To answer our research questions, our coding schema sought to determine the visibility and legibility of digital imprints. To explore implementation practice, we asked questions that mirrored each aspect of the Electoral Commission's guidance as follows:

Presence:

- Does the campaign material require an imprint? (Yes/No)
- Does the campaign contain an imprint? (A. Included within the material, B. Directly accessible from the material, C. The material has no digital imprint)
- How many clicks are required to view the imprint? (0,1,2,3, other)

Legibility:

- Is the imprint legible?⁷ (Yes/No)
- If the imprint is not legible, why? (A. Tiny Text, B. Text colour blends into background, C. Blurred, D. Other (please state))
 - 1 - How long is the imprint visible for? (A. Less than 5 s, B. 6–15 s, C. 16–30 s, D. Permanently visible, E.\$11 Other (please state))

We also included further questions about the immediate visibility and precise location of an imprint (i.e. where exactly was an imprint located in campaign material) not reported here (see Appendix B for full coding guide).

Findings

To answer our research question: “To what extent did campaigners follow the Electoral Commission’s guidance for the formatting of digital imprints?”, we first coded each piece of campaign material to identify the various attributes specified in the Electoral Commission’s guidance. As such we looked to identify whether an imprint was “in text form, unless it is included as a part of solely audio material where it must be included as audio material”. For each of our pieces of campaign material, we found no instances of audio imprints – we therefore focused on the additional criteria for text imprints. Taking this approach we sought to determine whether imprints were present and legible.

We begin by discussing the aggregate data from each of our actors and platforms. Drawing from our coding framework, we filtered our data to identify examples of campaign material that required an imprint, had an imprint included within the campaign material (*presence*), that required 0 clicks to view it (reflecting guidance that directly accessible imprints should be just one click away), that was visible for more than 5 seconds and that was easy to spot (*legible*). Applying this criteria, we found just 56 pieces of campaign material out of a total of 1,140 pieces (991 of which we deemed to require an imprint) that fully meet the standard set out by the Electoral Commission. Of these, 15 were Facebook ads, 7 Facebook posts, 11 X posts, 10 TikTok posts and 13 Instagram posts. Importantly, these examples suggest that, despite concerns about the compatibility of different platforms with imprints guidelines, campaigners did manage to present imprints in campaign material that were present and legible. Technical compliance on each platform was therefore possible. Despite this, only 5.7% (56/991) of our sample exhibited these standards.

Considering provisions are made for imprints to be directly accessible when it is not reasonably practicable to include an imprint, we also filtered to identify material that required an imprint, had an imprint directly accessible and required 1 click to view it (*presence*), that was visible for more than 5 s and that was easy to spot (*legible*). This search yielded 287 further results, or 28.9% (286/991). This suggests that, even in a best case scenario when all directly accessible imprints were justifiably in this format (something we did not assess), there remain 649 (62.7%) pieces of campaign material that require imprints but did not comply with the guidelines.

Presence:

In order to understand more about trends in compliance, we next consider the extent to which an attempt had been made to include an imprint in any form.⁸ Out of the 991 pieces of campaign material that required an imprint, 308 (34.1%) did not include an imprint, suggesting either deliberate or unintentional failures to comply. 683 (68.9%) did, however, include an imprint. We also found 39 pieces of campaign material from our wider sample (1,140) that did not require an imprint, but that nevertheless contained one.

A second key element of the Electoral Commission’s guidance relates to the imprint being “included as part of the material”. Provision is made for imprints to be “directly accessible” if initial guidance is not “reasonably practicable”, but as suggested above, there are reasons to believe that it was possible to include an imprint on all of our chosen platforms. Noting this, we asked whether imprints were included in campaign

material or directly accessible. Looking at the entire sample of campaign material containing imprints (722⁹), we see stark variation. Whilst 50.2% (346) of imprints were included in the campaign material, 48.9% (376) were directly accessible, meaning that they required the user to navigate to another page. This indicates that in a significant proportion of cases, campaigners are including imprints in another location, despite guidance stating this should not be done due to:

- “... preferences about the design or appearance of the material
- how effective you think the material will be
- how much time it will take to publish the material (Krippendorff 2011)”.

Interestingly, we found numerous examples of campaign materials where an imprint could have feasibly been included, but was nevertheless made directly accessible in the written bio of a page or in a header image. This suggests that campaigner preference, perceptions of effectiveness or time pressures may be directing practice contrary to the guidance.

We also asked how many clicks were required to view an imprint. The Electoral Commission’s guidelines say that directly accessible imprints should be “reached via a direct link, usually one click or equivalent”. As such, we infer that included imprints would be expected to require 0 clicks, and directly accessible imprints one click. Across our sample of all campaign material containing imprints,¹⁰ we found that 40.5% (293) required no clicks, whilst 55% (398) required one click, 3.3% (24) required 2, 1.1% (8) required 3 and just 0.1% (1) required 4.¹¹ Subdividing the data, however, we can see that guidance is tending to be followed as 84.7% (293/346) of included imprints required zero clicks, with just 51 (14.7%) requiring one click, and single examples requiring 3 and 4 clicks. Meanwhile for directly accessible imprints, 92% (347) required one click, with 6.1% (23) requiring 2 and 1.9% (7) requiring 3. This suggests that, for the most part imprints tend to align with guidance on the number of clicks, illustrating limited deviation from this aspect of the Electoral Commission’s guidelines.

Legibility:

Turning to consider whether imprints were legible, we used two measures. First, the guidelines state the imprint “must be legible”, but no further guidance is given on how this is determined. For our analysis, we asked coders to make a judgement about whether an imprint was legible (assigning a simple Yes/No code) and, if no was selected, asked them to explain why – giving options that included “tiny text”, “in a colour which meant the text colour blurred into background”, “blurred text” and “other reason”. Judgements were based on viewing a post on a desktop computer as opposed to a mobile device, hence we are not able to comment on the guidance’s provision that imprints should be legible “no matter what device is used”.

Whilst requiring a degree of subjectivity, we found little variance in coders’ judgments on that question (0.88 alpha). Across all platforms 62.3% (450/722) were deemed legible, meaning 272 (37.7%) were not judged to meet this standard. Looking at the reasons for a negative code, we found 56.2% (222) of imprints displayed in “tiny text”, 20.8%, (82) that were in a colour which meant the text colour blurred into background, 11.1% (44) written in “blurred text”, and 1.9% (47) that did not meet the standard for another

reason.¹² Looking in more detail at this last code, we deduced 7 additional reasons. The most common was that the imprint was obscured in some way, either being behind another image or partially covered by text (15). Next several video examples were only on screen for a very short period of time, often being flashed up briefly at the end (10). We also found that many imprints required action, such as scrolling or clicking to expose them fully (9). Other codes captured instances in which imprint text was written vertically (2), was hard to see (3), blended in with other parts of the post (6) or did not fit on screen (1). This suggests that whilst most imprints were legible, a not insignificant number were not, often due to tiny text size.

Finally, we considered whether an imprint was “on screen long enough that it can be read”. We differentiated between imprints being permanently visible, and then visible for less than 5 s (which we deem too short to likely read), 6–15 s, 16–30 s and “other”. Across all platforms, the vast majority (81%, 587) of imprints were permanently visible. However, 16.7% (121) were visible for less than 5 s, and 1.9% (14) were visible for 6–15 s, with just a single example (0.1%) visible for 16–30 s. This suggests that whilst a majority of posts complied with this guidance, a significant percentage contained imprints visible for less than 5 s.

Summarizing these findings, it appears that most campaigners were aware of the need to include an imprint. Indeed, 68.9% of the materials deemed to require an imprint did so in some form. Where material containing an imprint tended to deviate most from guidance was around the need for imprints to be included in material (as opposed to being directly accessible) and to be legible, with particular difficulties associated with the use of small fonts to display the imprint. We also saw a fairly large number of materials containing an imprint that was visible for less than 5 seconds. In contrast, the materials examined tended to display less deviation from the guidance when it came to the number of clicks required to view imprints. This suggests that, across our sample, there are certain parts of the guidance the Electoral Commission could focus on in attempts to improve compliance.

Explaining compliance: Platform Variations

Turning to our second research question, we now ask: Is compliance with digital imprints guidance consistent on different platforms? To address this question, we split our results by platform, differentiating between Facebook ads, Facebook posts, X Posts, TikTok posts and Instagram posts. Taking this approach, we can see differences in practice around the presence and legibility of imprints on different platforms.

First, in regard to presence, whilst 68.9% of all material requiring an imprint contained one, there was variation across platforms. As [Table 2](#) shows, Facebook advertising showed the highest numbers of imprints when required (85.5%), followed by X posts (72.8%) and then Facebook posts (69.4%). TikTok and Instagram posts were less likely to do so, with 59.9% and 57.1% of campaign material respectively having imprints. This could suggest that including an imprint is easier on certain platform materials (i.e. Facebook ads and X), or that compliance is lower when politicians do not have a long history of using certain platforms.

We saw similar differences in terms of whether an imprint was either included or directly accessible ([Table 3](#)). Whereas across all platforms 50.2% complied with guidance

Table 2. Amount of imprints evident within all actors' campaign material, by platform.

Amount of Campaign material ...	Facebook Ads	Facebook Posts	X Posts	TikTok	Instagram	Total
Requiring an imprint	172 (17.4%)	245 (24.7%)	217 (21.9%)	147 (14.8%)	210 (21.2%)	991 (100%)
Containing an imprint when required	147 (85.5%)	170 (69.4%)	158 (72.8%)	88 (59.9%)	120 (57.1%)	683 (68.9%)
Not containing an imprint when required	25 (14.5%)	75 (30.6%)	59 (27.1%)	59 (40.1%)	90 (42.9%)	308 (31.1%)

Table 3. Where is the imprint located, across platform.

	Facebook Ads	Facebook Posts	X Posts	TikTok	Instagram	Total
Included in campaign material	105 (70%)	69 (37.7%)	49 (29%)	59 (64.8%)	64 (49.6%)	346 (50.2%)
Directly accessible from the campaign material	45 (30%)	114 (62.3%)	120 (71%)	32 (35.2%)	65 (50.4%)	376 (49.8%)

that imprints should be included unless not reasonably practicable, there was large variation in compliance on different platforms. Facebook ads and TikTok posts, for example, tended to have higher amounts of campaign materials with imprints included, with 70% and 64.8%, respectively. In contrast, just 29% of X posts had an imprint included, whilst 49.6% of Instagram posts followed this guidance. This suggests that campaigners are not taking the same approach on each platform, potentially being guided by the affordances of different media.

Turning to consider the number of clicks required to reveal imprints, across all platforms we found 84.7% of included imprints required zero clicks,¹³ whilst 92% of directly accessible imprints required one click.¹⁴ Breaking this down by platform, we found very different practices. Imprints on Instagram and TikTok were closest to the guidance, with 98.3% of TikTok posts and 98.4% of Instagram posts requiring no clicks to view an imprint. In contrast, just 62.9% of Facebook ads required no clicks and 87% of Facebook posts were likewise. Similarly, for directly accessible imprints, whilst 100% of TikTok posts, 97.5% of X posts and 96.9% of Instagram posts required one click, 87% of Facebook ads and 83.3% of Facebook posts did likewise – revealing a similar trend. Looking to explain this, we observed that Facebook often required additional clicks because imprints were contained in videos that did not auto-play, but required the viewer to click to start the video and hence reveal the imprint. This suggests that Facebook's approach to autoplay is affecting the presence of imprints – as the same challenge is not encountered on TikTok where autoplay occurs. It also indicates that campaigners are not adapting their approach to the specific features of different platforms to ensure compliance.

Turning to legibility, as detailed above, across all platforms, we found 37.7% of imprints not to be legible.¹⁵ At the platform level we found four of the five platforms exhibited relatively similar behaviours, with 37.2% of Facebook posts, 30.2% of X posts, 31.9% of TikTok posts and 34.1% of Instagram posts containing illegible imprints. In contrast 54.7% of Facebook ads were assigned this code, suggesting specific barriers to legibility in this format.¹⁶ Looking at the reasons for these coding judgements (Figure 1), we do not identify a single reason for this outcome. Whilst tiny text predominates, 20.3% of Facebook ads with illegible imprints were displayed in a colour that blurred into the background, whilst 19.5% had blurred text. It does not therefore appear that a single

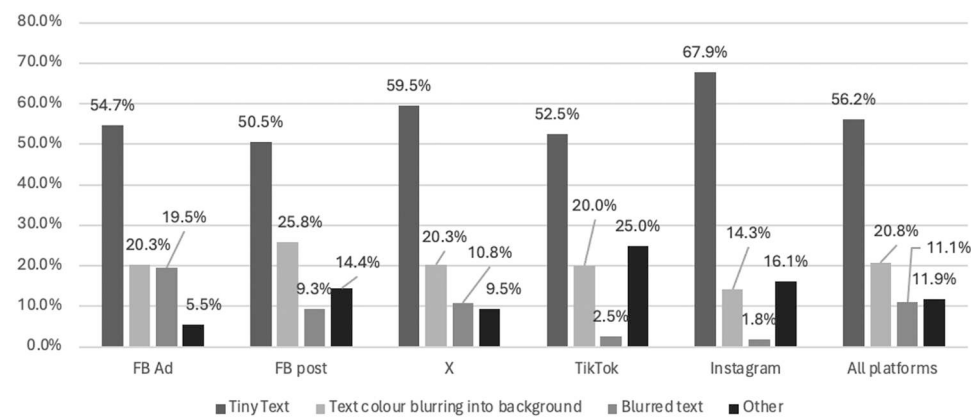


Figure 1. Reasons why imprints were not easy to spot, by platform.

functionality problem is responsible for this higher rate of illegibility raising questions about the cause of this difference.

Turning finally to the time imprints were on screen, for imprints across all platforms 16.7% of imprints were visible for less than 5 seconds, but as Figure 2 suggests, there was a large amount of variation across platforms. Only 9.8% of imprints on Facebook posts and 10.1% of X posts received this code, suggesting most imprints on these platforms are likely to be readable, but in contrast 16.3% of Instagram posts, 19.1% of Facebook ads and 39.6% of TikTok posts were displayed for 5 seconds or less. The particularly low figure for TikTok is likely due to the reliance on videos, as imprints are often not displayed throughout the video, but it is not clear why this is also lower for Facebook ads and Instagram posts.

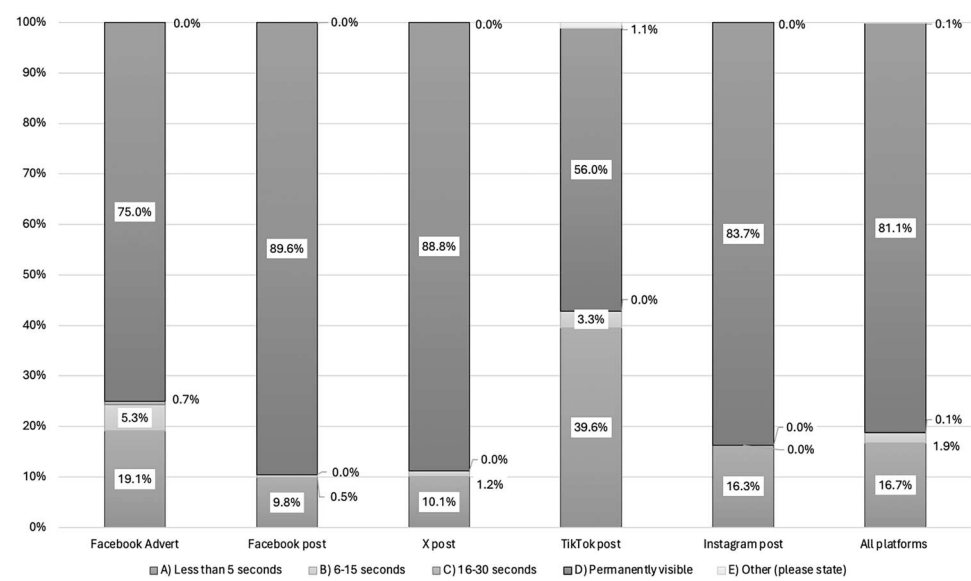


Figure 2. Amount of time an imprint is on screen for, % by platform.

When viewed at a platform level, our data therefore suggests that digital imprints are not being uniformly enacted on different platforms. Indeed, we suggest that although there are examples of practice that reflect the Electoral Commission's guidance on each platform, the affordances and norms of platforms do seem to exert an effect. For example, X posts are far less likely to include imprints than campaign materials on other platforms, potentially reflecting the character limit imposed on this service. Meanwhile Facebook ads (and to a lesser extent posts) are likely to require additional clicks to expose an imprint, seemingly because of the functionality of videos on this service (not auto-playing) which campaigners have not acted to address. We also saw that Facebook ads were much less likely to have a legible imprint, often (but not exclusively) due to the use of tiny text, whilst TikTok videos were particularly unlikely to have imprints visible for more than 5 seconds.

Explaining compliance: Actor Variations

Finally, we consider our third research question, asking: Is compliance with digital imprint guidance consistent depending on the actor responsible for campaign material? Specifically, we consider how national party accounts, local parties, candidates, and non-party campaign groups enact guidance. Beginning with overall compliance, when filtering our data by variables indicative of full compliance for included imprints, we find 5.6% of national party materials (5/90), 4.9% local party materials (13/264), 4.4% candidate materials (24/551) and 16.3% non-party campaign group materials (14/86) meet these standards. This compares to the average across all actors of 5.7%, suggesting that non-party campaign groups are considerably more compliant than other actors.

Conducting the same exercise for directly accessible imprints, we see compliance levels of 37.8% (34/90) for national parties, 25% (66/264) for local parties, 29.9% (165/551) candidates and 25.6% (22/86) non-party campaign groups. This compares to the total for all actors of 28.9%, suggesting that here national parties tend to use directly accessible imprints more than other actors.

Digging further into differences between our chosen actors, we begin by looking at the amount of campaign materials with any form of imprint. Across all actors, 68.9% contained an imprint when required, but breaking this down, we see that 93.3% of materials from national political parties included imprints, compared to around 60% of all materials from other actors (local parties 62.5%, candidates 68.8%, non-party campaign groups 64%). For local parties, it was particularly common for Northern Irish parties to not include imprints, with these actors responsible for 47/99 of materials requiring, but not containing an imprint. Plaid Cymru (14), Reform (10), SNP (10) and Alba (10) accounted for a large proportion of the rest.

In terms of the extent to which imprints, when present, were included in campaign material verses being directly accessible, [Table 4](#) shows that national parties had the lowest number of included imprints, with 40.7%. This was often because imprints were included in bio pages for these actors. Local parties had the highest percentage of campaign material with imprints included at 50.9%, suggesting slightly different practices between national and local parties. And yet, the differences between actors' approach found here is small, suggesting that the type of actor has limited impact on compliance with this standard.

Table 4. Where and whether an imprint is located, across platform, by actor.

	National parties	Local parties	Candidates	Non-party campaign groups	all actors
Included in campaign material	35/86 (40.7%)	85/167 (50.9%)	188/379 (48.3%)	38/80 (47.5%)	346/712 (47.9%)
Directly accessible	51/86 (59.3%)	82/167 (49.1%)	201/379 (51.7%)	42/80 (52.5%)	376/712 (52.1%)
Legible imprints	43/86 (50%)	97/167 (57.7%)	239/379 (62.9%)	61/80 (76.3%)	440/712 (61.6%)

Notes: Each row of this table reports separate results; hence the rows and columns do not add up to 100%. For “imprint immediately visible” the % reported is for this question alone, hence for national parties 32.6% was immediately visible, while 67.4% was not. One piece of campaign material was assigned two codes and hence was integrated into data, meaning the totals do not equal 100%.

Turning to the number of clicks required to expose an imprint,¹⁷ across all actors 84.7% of included imprints required zero clicks. At an actor level, national parties were more likely to have included imprints that required no clicks, with 94.3% (33/35) of their campaign materials coded this way. Non-party campaign groups exhibited a similar trend, with 89.9% (34/38) of their included imprints requiring no action. This compared to 84.7% (72/85) for local parties and 81.8% (154/188) for candidates, suggesting that there is some limited difference here by type of actor. This idea is, however, only partially confirmed when looking at directly accessible imprints. Across all actors 92% of directly accessible imprints required one click. As above, non-party campaign groups perform above this average, with 100% of their directly accessible imprints just one click away (42/42). But in contrast to included imprints, for national parties, just 84.3% (43/51) of directly accessible imprints follow guidance for one click – suggesting that national parties are not consistently more compliant than other actors. Rather we found candidates to be more compliant here, at 93.3% (188/201), whilst local parties had 89.2% (74/83) of their accessible imprints requiring one click. This suggests that certain actors appear to be more compliant with guidance on the number of clicks, with non-party campaign groups consistently performing better than other actors.

Turning finally to the legibility of imprints by actor, in terms of imprints deemed legible Table 4 shows that, compared to the average for all actors of 61.6%, non-party campaign group imprints were deemed more legible (76.3%) than imprints from other actors. National parties performed particularly badly, with just 50% deemed legible. Local parties performed slightly better at 57.7%, with candidates likewise at 62.9%. This suggests that the actor responsible does seem to affect legibility, and what is particularly interesting is that whilst national parties comply closely with other aspects of guidance, their imprints are often not clearly legible.

Finally, in terms of the amount of time imprints are on screen, above we found across all platforms that 16.7% of imprints were visible for less than 5 seconds. Looking across actors, we again saw variation, as here candidates tended to perform worse, with 20.2% of materials having an imprint visible for less than 5 seconds, closely followed by local parties at 16.2%. Meanwhile, just 8.8% of non-party campaign group materials and 9.3% of national party materials were coded this way. Whilst the vast majority of imprints were therefore permanently visible for each actor (90.7% for national parties, 82% for local parties, 76.7% for candidates and 90% for non-party campaign groups), a higher proportion of campaign material from candidates and local parties was not.

Cumulatively, our findings indicate that actors do not always behave in uniform ways. Whilst we find limited differences when it comes to whether imprints were included in campaign material verses being directly accessible, we find larger variance in terms of the presence of an imprint, the legibility of imprints and time imprints were on screen.

Discussion and conclusion

In this paper we set out to provide tangible insight into the implementation of disclosure requirements by conducting a case study of compliance with the UK's new digital imprint regime. Whilst other studies have sought to examine the effect of disclosures on their audience, our analysis set out to determine whether and how consistently these requirements were being enacted in practice, foregrounding questions around implementation and compliance.

Reviewing our data on digital imprint implementation we can see that far from being widely adopted and uniformly enacted, there is a spectrum of practice. Particularly starkly, we have found that the full set of Electoral Commission requirements (as we have interpreted them) have rarely been enacted. Indeed, when it comes to guidelines for included imprints, we find just 5.7% of campaign material requiring an imprint enact these rules. Noting that provision is made for directly accessible imprints when including an imprint is not “reasonably practicable”, we did find that a further 28.9% of materials complied with standards for this type of content, but we have questions about the use of this approach. Whilst we did not ourselves assess the extent to which including an imprint was not reasonably practicable, we did find examples of campaign materials on each of our chosen platforms containing embedded imprints (suggesting feasibility on each platform), and we observed many instances in which actors appeared to favour inclusion of an imprint in their bio pages as opposed to within campaign material. These observations lead us to question the degree to which many of these directly accessible imprints could not be feasibility embedded within campaign material.

Drawing this conclusion, we do, however, note that many campaigners are making some effort to include imprints. We found that 68.9% of material that required an imprint did include some form of imprint, suggesting an awareness of the regime and some attempt to comply. Exploring where campaigners tended to deviate from the guidance, we found that almost half of this campaign material had an imprint directly accessible rather than included, that 37.7% of imprints were not legible (often due to tiny text (56.2% of these cases)), and that 16.7% of imprints were visible for less than 5 seconds. We saw closer levels of compliance when it came to the number of clicks required to access imprints on included and directly accessible imprints. In terms of thinking about how guidance is being enacted, this analysis suggests that there are certain areas in which regulators could focus efforts to improve compliance, specifically in terms of promoting included imprints, text size and time on screen.

In addition to this descriptive analysis, our second and third research question sought to explore explanations for compliance practice by considering the impact of platform and actor on implementation. Our analysis has found that both factors appear to play a role. When it comes to platforms, we found that Facebook ads and TikTok posts are more likely to include an imprint within the material, whilst imprints on X were more likely to be directly accessible. Yet, despite Facebook ads being most compliant in

terms of being included, on this platform we found that the user needed to make additional clicks to expose an imprint due, in part, to the lack of auto-play on videos posted on this platform. We also found that imprints on Facebook ads were most likely to be judged illegible, often (but not exclusively) due to tiny text. Finally, TikTok posts were more likely to be visible for less than 5 seconds, apparently reflecting the dominance of video on this platform. This suggests that the dynamics of platforms do make a difference to implementation practice, indicating that attempts to enhance compliance need to focus on the promotion of good practice on different platforms and campaigners' duty to tailor their imprints to each individual platform on which they engage.

Turning to the impact of actors, we again found that actors do not behave in uniform ways. Specifically, we found that national political parties are more likely to include an imprint in some form of campaign material requiring an imprint compared to our other actors. They were also more likely to have included imprints that required no clicks, but this was not the case for directly accessible imprints, where national parties fell considerably behind other actors in requiring just one click on directly accessible materials. We also saw that non-party campaign groups had considerably more imprints deemed legible than other actors and a smaller proportion of their materials had imprints visible for less than 5 seconds than other actors, suggesting they perform best on legibility. Whilst suggesting differences, there are not clear explanations for these trends. Previous research has suggested that available resource and organizational purpose could be possible reasons for variation in compliance (Nassmacher 2019), and we did indeed find that smaller, less resourced and often regional parties (such as Plaid, DUP and Reform) were less compliant than their nationwide counterparts (like Labour or the Conservatives). We also found that national parties often performed better than local parties and candidates (although not consistently so). Perhaps surprisingly given their limited electoral focus, one notable finding was that non-party campaign groups often performed better in terms of compliance. Further research is needed to explore the precise patterns of compliance comparing, for example, campaign material from the same national and local party and candidates, and considering additional variables (i.e. size, incumbent status, financial resource etc) to fully understand the drivers of these trends.

In regard to our particular insights into the UK case they are valuable to regulators in revealing where additional guidance could be issued to promote compliance. Our findings suggest a need to improve understanding of what constitutes full compliance. We have shown that efforts are being made in a significant proportion of campaign materials to include imprints in some form, but that these efforts are often failing to meet the full requirements outlined by the Electoral Commission. This suggests the value of showcasing what best practice looks like in different media, building on existing guidance by giving examples of what is and is not compliant.

Our second recommendation relates to the guidelines themselves. Our analysis has been based on an interpretation of Electoral Commission guidelines, meaning that we inferred what may prove indicative of a "legible" imprint and what constitutes "long enough to be read". We also assumed that included imprints should require 0 clicks (reflecting the statement that directly accessible imprints should be one click away). These criteria could, however, be interpreted differently by other actors because of a lack of precision as to what exactly is needed. Looking to other disclosure regimes there are examples where more prescriptive requirements have been outlined with, for

example, the Australian Government specifying that printed electoral communication must contain information that is “legible at a distance at which the communication is intended to be read” and should “be in a text that contrasts with the background on which the text appears” (Australian Government 2021, Part 3, Division 2, 11:3). We believe that more detail about what constitutes legible could be given, as could guidance on the amount of time an imprint should be visible and whether imprints should be immediately visible (requiring no or a single action from the viewer). This would help to reduce ambiguity around interpretation of current guidance.

Looking beyond our specific case, this study has sought to foreground questions of implementation and compliance within debates around transparency and disclosures. Transparency is often prescribed as a regulatory response to administrative challenges (Erkkilä 2020), but too often we know little about the degree to which this intervention will deliver desired effects. In looking at the actual practice of disclosure implementation, we have sought to understand more about real-world compliance. In particular, we have sought to build on pre-existing efforts to interrogate platform companies’ compliance with digital regulation (Borz et al. 2024; Kirk and Teeling 2022; Le Pochat et al. 2022), by foregrounding campaigners’ compliance practice. Like pre-existing studies, we have shown that current implementation practice often deviates from regulatory guidelines. We therefore suggest that calls for tighter regulation, stronger regulatory infrastructure and more effective monitoring (Kirk and Teeling 2022) are necessary not only to boost platform compliance, but also for efforts to enhance campaigners’ compliance. These actions, and the specific recommendations made above are vital if efforts to enhance transparency are to be successful. Whilst existing research has shown that transparency can boost persuasion awareness (Kruikemeier, Sezgin, and Boerman 2016) and improve recall and ad recognition (Jost et al. 2022), these effects are only likely to be achieved if the standardized placement of imprints evident in experimental research is reflected in the real world. Whilst our study has sought to understand how far current practices in the UK vary from the stated ideal, future work should seek to measure the impact of these real-world disclosure practices on effects.

In terms of limitations, our audit of compliance with the digital imprints guidance does not capture all practice. One key limitation of our study was the need – due to data access challenges – to manually capture examples of campaign material in a short time period. This imposed a limit on the number of accounts we could audit, and hence our analysis is by no means comprehensive. Whilst we cannot draw generalizations from our data about all practice, we have nevertheless sought to reveal practice from major political actors that we suggest have a stake in ensuring compliance. Whilst less familiar and transient campaigners may not be incentivized to comply, more familiar and longstanding groups have an interest in maintaining their reputation by complying. By studying the behaviour of these actors we suggest that our analysis demonstrates how those most likely to comply are behaving. On this basis we contend that compliance levels may be even lower amongst other actors. Future research should explore the potential for computational methods to gather a larger sample of accounts and undertake a wider audit of practice over more platforms. Finally, our work engaged with questions around variation in practice. Looking at different platforms and actors, we offer a high-level analysis, but there is potential for a more fine-grained study to attempt to explain different compliance practices. If access to a larger sample becomes available, scholars could investigate more

precisely whether, for example, less resourced campaigners are less compliant than resource rich campaigners, or whether the incumbency status of a candidate increases their compliance. Such questions can help to generate more insight into possible variations in practice to improve understanding of why compliance is not uniform.

In conclusion, this article sought to foreground the implementation challenges encountered in efforts to regulate digital technology. In light of recent interest in the effect of transparency interventions as a means of boosting public understanding of electoral campaign activity, we set out to determine how disclosure requirements were being implemented in practice. Echoing previous studies of platform companies' compliance with digital regulation requirements, we find that campaigners often fail to enact regulatory guidelines. Using a case study of practice in the UK, we find that despite some efforts to comply, the majority of campaign material examined did not conform to guidelines, with both the platform on which campaign material is placed and the actor placing it affecting compliance behaviour. Offering recommendations to regulators, we have illustrated the importance of efforts to shape, monitor and uphold regulatory guidelines if desired transparency outcomes are to be secured and called for further research seeking to explain why compliance practices are so varied.

Notes

1. For local parties we identified 3 examples from 14 of the national parties also identified (essentially removing Welsh and Scottish national parties, such as Welsh Labour). We chose candidates from all 22 national parties and also included 6 independent candidates.
2. We report the parties and non-party campaign groups examined in Appendix A. We do not disclose which particular candidates and local parties we examined in line with our ethics application.
3. We chose to look at public pages as detailed in our ethics application: Reference Number 064147.
4. On Instagram we looked at posts and not at stories.
5. This calculation reflects the intention to audit 298 accounts across 5 formats, which equals 1,490 potential pieces of campaign material.
6. The scores for each coding pair were: Pair 1: 0.76, Pair 2: 0.8, Pair 3: 0.97.
7. When coding, we asked whether it was easy to spot, but have amended the wording here to more closely mirror the term used by the Electoral Commission's guidance.
8. In the analysis below we report data for all posts containing an imprint, meaning we included posts that contained an imprint which we did not deem to be necessary in line with the guidance. This allows us to report on *all* efforts to implement this guidance, even where such efforts were not required.
9. This comprises the 39 pieces that contained, but did not require an imprint, and the 683 that required and contained an imprint.
10. One post contained imprints in two places and so codes were assigned, meaning this totals to 723.
11. One post contained imprints in two places and so codes were assigned, meaning this totals to 723.
12. 114 posts prompted more than one code. For simplicity of reporting, we have integrated posts with multiple codes into the four categories, meaning we report data for 274 codes.
13. This is 84.7% of the 52.2% of campaign materials categorised as "included in campaign material" in Table 3.
14. This is 92% of the 49.8% of campaign materials categorised as "directly accessible from the campaign material" in Table 3.

15. Once again we look at all material containing an imprint, whether required or not.
16. Two pieces of campaign material were given two codes, hence the percentages do not total to 100%.
17. One post contained imprints in two places and so codes were assigned, meaning this totals to 723.

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No potential conflict of interest was reported by the author(s).

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Appendices

Appendix A

National party accounts		Non-party campaign groups
Labour	38 Degrees	
Conservatives	3rd Party Ltd	
Liberal Democrats	Best for Britain Limited	
Reform UK	ASLEF	
Greens	Communication Workers Union	
Plaid Cymru	Compass Campaigns Ltd	
Welsh Labour	East Wight Primary	
Welsh Conservative	Educational Institute of Scotland	
Welsh Liberal Democrat	EVERYDOCTOR LTD	
Welsh Greens	Friends of the Earth Limited	

(Continued)

Continued.

National party accounts	Non-party campaign groups
Scottish Labour	GMB Union
Scottish Conservatives	Green New Deal UK Ltd
Scottish Liberal Democrats	Greenpeace Limited
Scottish Greens	HOPE not hate Ltd
Scottish National Party	Indy First Ltd
Alba	Kent Citizens Limited
Sinn Fein	Led By Donkeys Ltd
DUP	Majority Media Ltd.
SDLP	Make Votes Matter
Alliance	Momentum Campaign (Services) Ltd.
UUP	Mr Christopher Stevenson
Traditional Ulster Voice	Mr Daniel Lovell
	Mr Graham McArthur
	National Association of Schoolmaster Union of Women Teachers (campaign name: NASUWT The Teachers' Union)
	National Education Union
	National Union of Students (United Kingdom)
	Open Vote
	SB Supports the Union Limited
	Scotland Matters
	South Devon Primary
	Tactical Voting Coalition Ltd
	Union of Shop, Distributive and Allied Workers (USDAW)
	UNISON: The Public Service Union
	Unite the Union
	Unite to Reform Limited
	Vote-OK
	WE OWN IT LTD
	Zero Hour
	We Deserve Better
	YesCymru Cyf
	Fire Brigades Union
	Ecotricity New Ventures Limited
	Mr Christian Hacking – Campaign Name (Vote Life)
	Keep our NHS Public
	Stand up to Racism
	Help for Heroes
	Musicians Union
	Cruelty Free International
	Forward Democracy limited
	SPUC Pro Life Limited
	RMT
	Good Law Project
	MP Watch
	British Dental Association
	Scottish campaign for Nuclear Disarmament
	The Muslim Vote
	Liberty
	Labour Together Limited

Appendix B

