

FREE BUT NOT FAIR

**British elections
and how to restore
trust in politics**



Parliamentary disclaimer

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The **APPG for Fair Elections** campaigns for clean and fair elections where all votes count by:

- Replacing First Past the Post with a proportional system that makes seats match votes.
- Eliminating dark money and undemocratic influence from politics.
- Countering disinformation in public discourse.

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▼ The inaugural meeting of the APPG for Fair Elections



INTRODUCTION

If the fight for trust is “the battle that defines our age”, as the Prime Minister has stated¹, it is a battle Westminster is losing. While this year’s general election marked a new direction for Britain, there is no sign that trust in politics is recovering from an all time low.

The All Party Parliamentary Group (APPG) for Fair Elections believes this decline has deep-rooted, structural causes - many of which are now widely recognised:

- The majority of political parties represented in the House of Commons (including Labour) - with a combined total of over 500 MPs - agree that First Past the Post fuels distrust and alienation in politics. A majority of the public want it replaced with a fair, proportional system.²
- An influx of money into politics fuels distrust: just 13% of Britons think campaign funding is transparent enough.³ Even nine out of ten lobbyists say there should be more transparency about who is influencing politicians.⁴
- Just one in eight people have confidence in traditional media as it informs democratic debate.⁵ Two-thirds believe social media companies fail to tackle disinformation⁶ and need tighter regulation.⁷

To restore trust in politics, and both defend and improve our democracy, the government must address the underlying causes of public distrust. Our APPG calls on the government to take these three initial steps towards this:

1. Establish a National Commission for Electoral Reform to recommend a fair and democratic replacement for First Past the Post.
2. Close donation loopholes, so the public knows who donates, how much and to whom, while strengthening the Electoral Commission to enforce the rules.
3. Require social media companies to be transparent about how they handle ‘legal but harmful’ content, including disinformation.

These are not just technical changes. They are the first steps towards ensuring people regain confidence in democracy and its power to shape a better future for us all.

Alex Sobel MP
Chair

Ellie Chowns MP
Vice Chair

Lisa Smart MP
Vice Chair

Lord Balfe
Vice Chair



EXECUTIVE SUMMARY

The collapse of trust in British politics has been decades in the making. Satisfaction with democracy has fallen further and faster than in almost any comparable country.⁸ Today, fewer than three in ten Britons trust the government⁹, and voters believe their views have little impact on election campaigns¹⁰, policies or decisions of government.¹¹

The 2024 general election marked a change of direction for Britain, but trust in politics remains low. There is no sign that a new government has marked a change to this long term decline of trust and confidence in our politics. Instead, trust can only be restored by addressing the deep-rooted, underlying causes of disillusionment.

The APPG for Fair Elections has identified three critical threats to fair elections across the UK and trust in our political system. Each of these reflects a shared fundamental problem: that some people have far greater say in British democracy than others.

THREE THREATS TO FAIR ELECTIONS

- First Past the Post
- Dark money and hidden influence
- Disinformation

This report outlines the scope of these threats and their consequences, presenting the issues the APPG will address in the coming months and years. At this stage, we limit ourselves to three headline recommendations for government, purposefully selected as simple, tangible, deliverable first steps that would begin to restore trust in British politics.

Threat 1: First Past the Post (FPTP)

The UK's FPTP electoral system has produced the most unrepresentative election result in our history, with a landslide majority in return for a third of the vote. This system leaves most Britons without a real voice. But the performance of the voting system has been steadily deteriorating for decades, with consistently falling turnout, a decaying two-party system, rising disproportionality and growing instability. If current trends continue, Britain could soon expect to see general elections in which turnouts fall below 50%, extreme disproportionality undermines the legitimacy of results, and parliamentary majorities are won with support from fewer than one in three voters.

A broad political consensus has emerged: parties with a combined 500 MPs (77%), including Labour, are in agreement that FPTP is a flawed system that is causing distrust in politics¹². New polling has found almost two thirds (64%) of the public believe the government should address these flaws before the next general election. There is now record and majority public support for changing to a proportional voting system, particularly among those who trust politics the least¹³.

Recommendation 1: A National Commission for Electoral Reform

We call on the government to establish a National Commission for Electoral Reform with a mandate to recommend a fair and democratic

voting system in which every vote counts equally. Beginning work in 2025, the Commission should allow citizens, alongside experts, to evaluate the options and recommend a new system for modern Britain that would command public trust and confidence - drawing insights from the UK's devolved governments and other democracies.

Threat 2: Dark money and hidden influence

Public concern is mounting over unaccountable money and concealed influence in politics: only 13% of Britons view political funding as sufficiently transparent.¹⁴ Rather than limiting the flow of money, regulatory standards have shifted to accommodate larger donations. Loopholes enable dark money to enter politics, allowing donors to conceal identities and sources of funds easily and evade permissibility rules. The weakened Electoral Commission now lacks the power and autonomy to regulate effectively. Hidden influence through professional lobbyists, informal lobbying, certain categories of second jobs, and conflicts of interest has become entrenched, facilitated by loopholes in a lax regulatory system.

Recommendation 2: Close donation loopholes and strengthen the Electoral Commission

We call on the government to close the loopholes which allow donors to circumvent permissibility and transparency rules, while restoring the independence and prosecutorial powers of the Electoral Commission to enforce these regulations. These first reforms to campaign finance rules since 2000 would allow the British public to know who donates, how much, and to whom.

Threat 3: Disinformation

Disinformation, compounded by distrust in

The 2024 general election marked a change of direction for Britain, but trust in politics remains low"

both legacy and new media, threatens informed political debate in Britain. Weak media pluralism and ineffective regulation undermine legacy media's integrity. Online, algorithms amplify false and divisive content, with new media companies profiting from the boosted user engagement this generates. The UK has not kept up with other jurisdictions in combating 'legal but harmful' content, coordinated disinformation campaigns, or data-driven campaigning. Wealthy owners can use their platforms to promote their own ideology and attempt to influence political outcomes.

Recommendation 3: Require transparency in handling of 'legal but harmful' content

We call for the government to amend the Online Safety Act to require new media platforms to publish risk assessments for 'legal but harmful' content, in the same way that they are currently obliged to do so for illegal content. We all have the right to free speech, but no one has the right to unlimited amplification of content that is likely to spread harmful disinformation.

THE COLLAPSE OF TRUST IN

It is widely acknowledged by academics and politicians that trust in Britain's political system has fallen to an all time low. This did not happen suddenly: it is part of a long-term decline, with deep-rooted structural causes stretching back decades.

The 2024 general election marked a change of political direction for the UK, with a Labour government ending fourteen years of Conservative rule. But there are so far no signs that trust in politics has begun to recover as a result. Indeed, the public remains as distrustful of the political system as ever, which it continues to see as broken, alienating and unfair.

Trust in politics – an all time low

Public trust in our political system is in a state of crisis. Fewer than one in three Britons now believe that the UK is a well-functioning democracy¹⁵, with three quarters believing British governments are “rigged to serve the rich and influential” rather than reflecting the will of the people¹⁶. A large majority of people across every region and nation of the UK “feel invisible to political leaders”.¹⁷ Just one in three Britons said they trusted the general election campaign to represent the concerns of “people like me”¹⁸.

Only three in ten people trust our governments¹⁹, while a record 45% of the public “almost never” trust government to put the interests of the nation above those of their political party²⁰. A majority agree that ‘it doesn't matter who you vote for, nothing will ever really change in Britain’²¹ and just 6% believe the views of Britain's voters are the main influence on decisions by its government²².

Public dissatisfaction with the state of democracy in the UK is the highest it has been since the 1970s²³. Seven in ten people believe our political system is working badly²⁴, eight in ten say the system could be improved upon²⁵, and six in ten believe British government institutions are “completely ineffective at pushing through positive change”²⁶.

45%

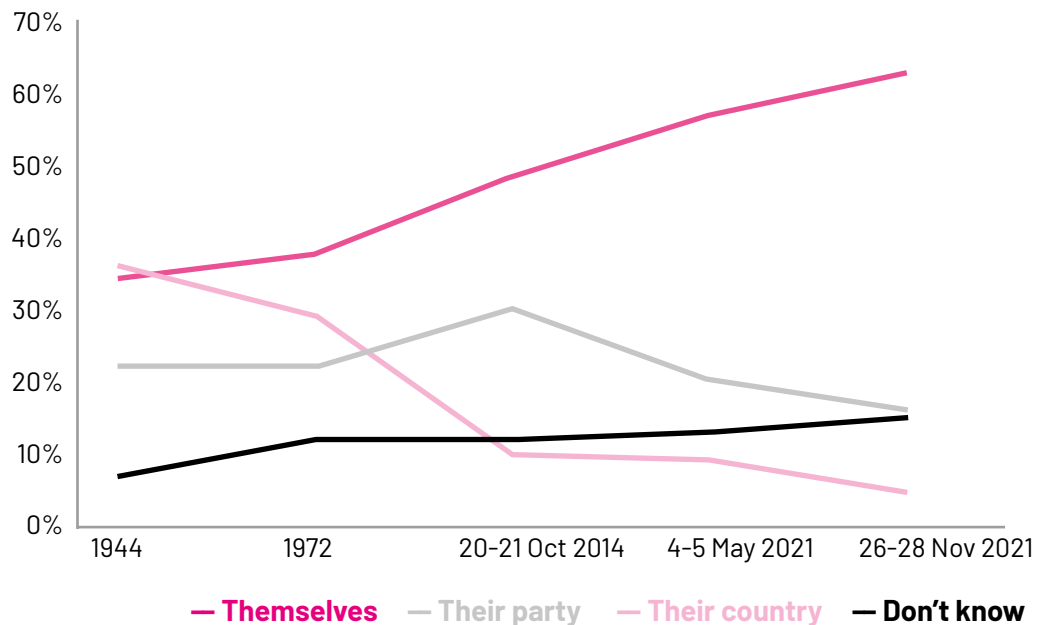
of the public “almost never” trust government to put the interests of the nation above those of their political party

Almost two-thirds of the public believe politicians are “merely out for themselves” and six in ten say they “almost never” trust politicians to tell them the truth when they are in a tight corner. Only one in twenty believes that politicians' priority is to do their best for the country²⁷ and just one in ten trusts politicians and government ministers to tell the truth²⁸.

Decades of decline

This collapse has not happened overnight. It is part of a long term decline stretching back decades, reflecting an outdated and increasingly dysfunctional political system in need of fundamental reform. Although trust in politics and satisfaction with democracy have fallen on average across the world during this time, this fall has been further and faster in Britain than in almost any comparable nation²⁹.

BRITISH POLITICS



▲ **Figure 1: Responses to the question: 'Do you think that British politicians are merely out for themselves, for their party, or to do the best for their country?'. Reproduced from *Trust Issues*, IPPR (2021)**

The IPPR found strong evidence that the public's perception of politicians has grown more negative over time, and that trust has fallen substantially in recent years³⁰. Around a third of Britons believed politicians were only out for themselves in 1944, rising to almost two thirds in 2021³¹ (see Figure 1).

Satisfaction with democracy in the UK has been on a downward trajectory since the turn of the century³². The UK has been found to have amongst the lowest trust in government in the OECD³³, and by far the lowest in the G7³⁴. At 30%, trust in government in the UK is 21% behind the global average³⁵.

The 2024 general election: a turning point?

Restoring trust in politics was a key promise made by party leaders during the campaign. In his first speech as Prime Minister, Keir Starmer

declared that: "The fight for trust is the battle that defines our age" and that showing "politics can be a force for good" is "the great test of politics in this era"³⁶. Since the election, the new frontbench have on several occasions restated their intention to "restore trust in politics"³⁷.

But four months after the election there is no sign that this is the case. More than six out of ten people believe the new government is most interested in helping themselves and their allies³⁸. Four in ten think Labour and the Conservatives are no different on cronyism and corruption, while a majority see Labour as "very" or "somewhat" corrupt³⁹.

While the government has announced its intention to carry out some modest reforms, far more ambitious and fundamental change is needed if Britain is to have a chance of rebuilding trust in its democracy.

THREE THREATS, ONE FUNDAMENTAL CHALLENGE

The APPG for Fair Elections has identified three threats to the fairness of our democratic process which we believe are having a hugely damaging impact on trust in British politics.

They each reflect the same underlying problem: they afford some people in Britain far greater say over our democracy than others. Addressing these three threats is part of the urgent challenge to restore public trust:

- First Past the Post:** The Westminster voting system has produced the most distorted general election result in history⁴⁰, denying the majority of British voters a real say in both who represents them in Parliament and who governs the country.
- Dark money and hidden influence:** Campaign finance is increasingly opaque, with significant loopholes in donation and lobbying rules allowing unaccountable actors to exert influence. Meanwhile, a weakened Electoral Commission lacks the powers to enforce regulations. This system amplifies the influence of wealth, while muting the voices of ordinary citizens.
- Disinformation:** The regulation of Britain's legacy media is outdated and fails to ensure a fair and independent press. The rapid growth of new media platforms has further highlighted the inadequacy of existing media regulations, with pervasive implications for our democracy.

In the following sections, we explore how each of these threats negatively impacts voters, elections, and public perceptions of British politics. We then outline **three key recommendations** for government; initial steps that could be implemented swiftly to begin to address these issues:

- 1. Establish a National Commission on Electoral Reform:** starting from the broad consensus that First Past the Post is flawed and damaging trust in politics, the Commission would allow citizens', alongside experts, to recommend a fair and democratic voting system in which every vote counts. It should start work in 2025.
- 2. Close donation loopholes and strengthen the Electoral Commission:** the first reforms to campaign finance rules since 2000, these simple changes would prevent individuals or groups from bypassing permissibility and transparency rules and would reinstate the Electoral Commission's independence and authority to enforce regulations.
- 3. Require transparency in handling of 'legal but harmful' content:** require new and social media platforms to publish risk assessments for 'legal but harmful' content, in the same way that they are currently obliged to do so for illegal content.

THREAT 1

FIRST PAST THE POST

This year, the First Past the Post (FPTP) voting system produced the most disproportionate general election result in British history, but it has been **distorting elections and disempowering voters since universal suffrage.**

In this section we consider the damage done by FPTP using examples from the 2024 general election. We then set out how these problems have consistently become worse over the last century – and what this means for the fairness of future elections in the UK. Finally, we identify the current political consensus on FPTP, surging public support for change, and our key recommendation.

a. The most distorted general election in British history

The problems of FPTP are not new, but their manifestation in this year's general election result should trouble all democrats.

Unrepresentative government

Labour won a historic landslide victory on the strength of just one in three votes cast, securing 63% of seats in the House of Commons in return for 34% of the vote.

Because FPTP has no mechanism to ensure seats in Parliament broadly reflect the popular vote, British elections provide no reliable link between the level of public support a party commands and the amount of political power they are given.

When a party most people did not vote for is handed a large majority of seats, it makes most people feel they have little say over who governs Britain or over policies or decisions of government. Results in which as many as two thirds do not get the party they voted for in government contribute to the sense that the political system operates against the interests of most ordinary people.

Ignored voters

58% of those who voted in the 2024 general election did not get the MP they voted for.

As well as failing to reflect how people voted at a national level, FPTP also fails to reflect how most people voted in their local constituency. Each local constituency can be won on a minority of the vote and, in 2024, in most cases this resulted in a majority of local voters (around seventeen million people in total) getting a representative they did not vote for. This reinforces the widespread impression that ordinary people have no real influence over who speaks for them in politics, particularly in the many cases where the local MP does not share, reflect, or agree with the voter's worldview and political priorities.

Ignored communities

Most constituencies were not selected as target seats by political parties, so most voters were deprioritised in the election campaign.

Despite a historically high number of seats (303) changing hands, and a number of prominent politicians losing their previously safe seats, most constituencies were not seriously contested in the general election. Under FPTP parties are heavily incentivised to focus their campaigning intensely on only those seats that have a realistic prospect of changing hands. 2024 was particularly notable for the discipline with which Labour, the Liberal Democrats and the Green Party adhered to that strategy. This resulted in dramatic shifts amongst battleground seats but also meant that the majority in non-target seats were largely ignored. Neglecting the majority of constituencies and voters at each general election feeds the widespread impression that political change is something that happens without regard for their own views and votes. This effect is compounded in the many cases in which years or decades pass without particular areas of the country being deemed battleground seats.

Unequal votes

It took 24,000 votes to elect each Labour MP, 56,000 votes to elect each Conservative MP, 486,000 votes to elect each Green MP, and 824,000 votes to elect each Reform UK MP.

The average Labour vote was worth more than twice as much as a Conservative or Liberal Democrat vote, 20 times as much as a vote for the Green Party, and 35 times as much as a vote for Reform UK. As Keir Starmer himself wrote in his co-authored book of 2003, *First Past the Post* “does not give electors votes of equal value”⁴¹. Many voters are acutely aware of this fundamental inequality at the heart of Britain’s most important electoral process, undermining confidence and trust in the political system to treat ordinary voters fairly. It is an understanding of this problem which forces many voters to engage in tactical voting, with one in five voters reporting that they planned to vote for someone other than their preferred candidate⁴².

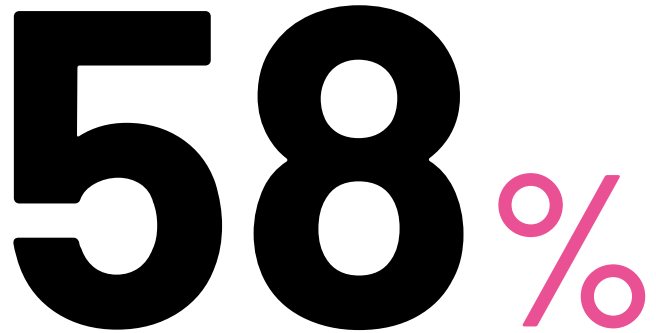
Unrepresentative Parliament

The Green Party won 6.5% of the vote but just four seats. Reform UK won 14.3% of the vote but just five seats.

Millions of people voted for parties that attracted significant national support, yet which won only a tiny number of seats in the House of Commons. These voters are excluded from having their voices properly heard in Parliament, alienating large sections of the electorate.

Meanwhile, Labour more than doubled its seats on the basis of a 1.6% gain in vote share – a so-called “loveless landslide” – and with a smaller number of votes than it received in the 2019 general election, widely considered to be its worst election result since 1935. The Liberal Democrats increased their seat share ninefold despite increasing their vote share by less than 1%, also receiving fewer votes than in the previous election. British voters correctly perceive that there is little relationship between

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58%

.....

of voters in the 2024 general election did get the MP they voted for

.....

how they vote and the electoral and political outcomes our system produces.

By producing a Parliament far less politically diverse than the country it is supposed to represent, FPTP gives politicians and government a distorted picture of national opinion, undermining their ability to identify and understand issues in the country at large which might otherwise be expressed by more accurate political representation. Over time, the mismatch between the politics of the country and its Parliament entrenches the sense that politicians do not understand the public or put its interests first.

Bad incentives

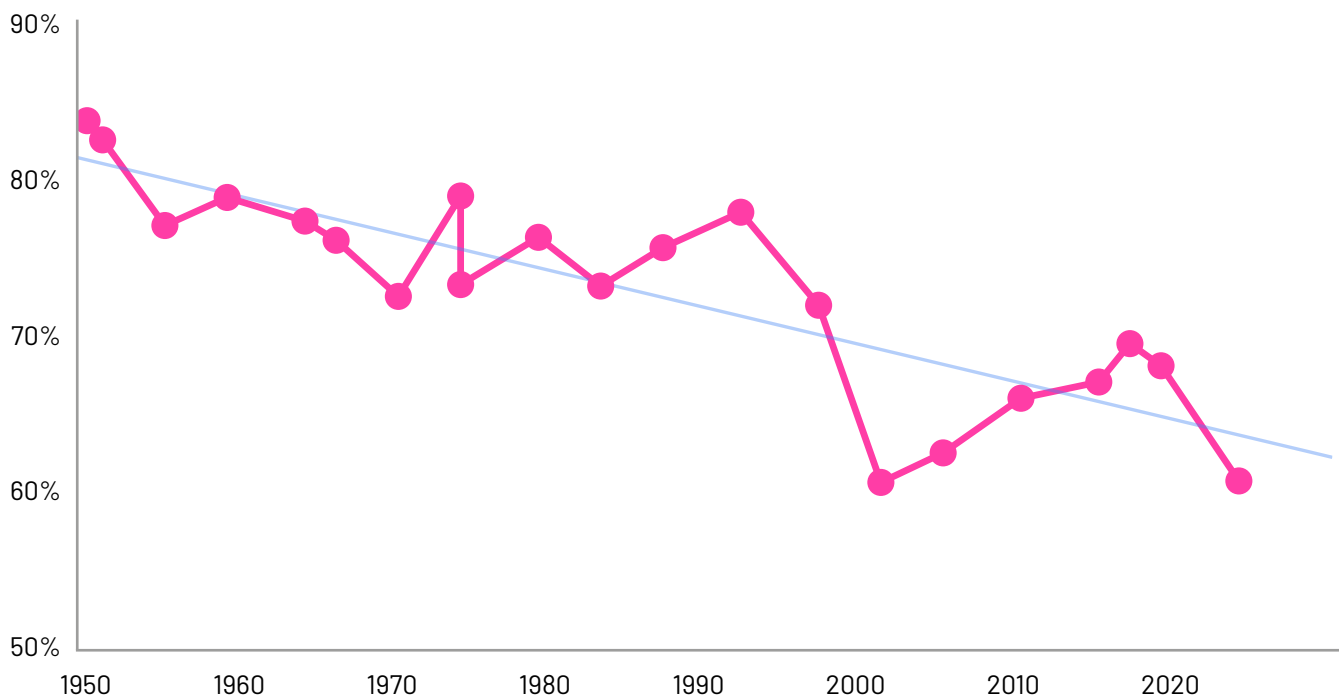
The way FPTP distorts the translation of votes into power, elevates the importance of some voters over others, and rewards the distribution rather than number of votes, all coincide to create perverse and democratically unhealthy incentives for parties, politicians and, as a consequence, the media. The imperative to focus on voters in target seats to the neglect of all others alienates millions of voters and citizens who seek first and foremost to engage with politics at a local level. The main political parties focus their policy programmes, messaging and campaigning around the concerns of small groups of swing voters in target constituencies, who tend to be older, less ethnically diverse, relatively well-off homeowners.⁴³ This effectively centres the national political debate around the idiosyncratic needs, priorities and anxieties of these unrepresentative demographics rather than the population at large. As a consequence, the majority of voters understand that politics is not aimed at or about them, their communities, or their material interests.

FPTP also encourages politicians to exaggerate differences with opponents. Proportional electoral systems do not automatically lead to collaboration and compromise in political culture and conduct, but they do allow for and incentivise both. It has been well-established by international comparisons that proportional democracies are more likely to build consensus where there is agreement, enabling parties to work together and deliver long-term policies which command broader public support⁴⁴. In contrast, because even tiny shifts in the polls have the potential to produce an electoral landslide, FPTP incentivises politicians to use every opportunity to attack and criticise opponents even where no fundamental disagreement exists.

FPTP IN OTHER ELECTIONS

Westminster elections are not the only ones in the UK to continue using First Past the Post. Local elections in England and Wales still use FPTP and routinely “fail to reflect the views of voters in who runs their local community”⁴⁵, although since 2021 Welsh principal councils have had the power to switch to PR for their own elections instead.

The use of FPTP was actually expanded during the last government, with the system replacing a preferential system in elections for mayor and Police and Crime Commissioner elections under the Election Act 2022. Since then, turnout in these elections has fallen by 5% and the proportion of candidates winning with less than 40% of the vote has jumped from zero in 2021 to almost half in 2024.



▲ **Figure 2: Turnout amongst registered voters**

b. A voting system in decline

While the unfairness of the 2024 general election is particularly stark, it is just the most recent example of a voting system in terminal decline. Across a range of indicators FPTP has been performing worse and worse for decades, with increasingly unpredictable results. There will be alarming consequences if this trajectory continues.

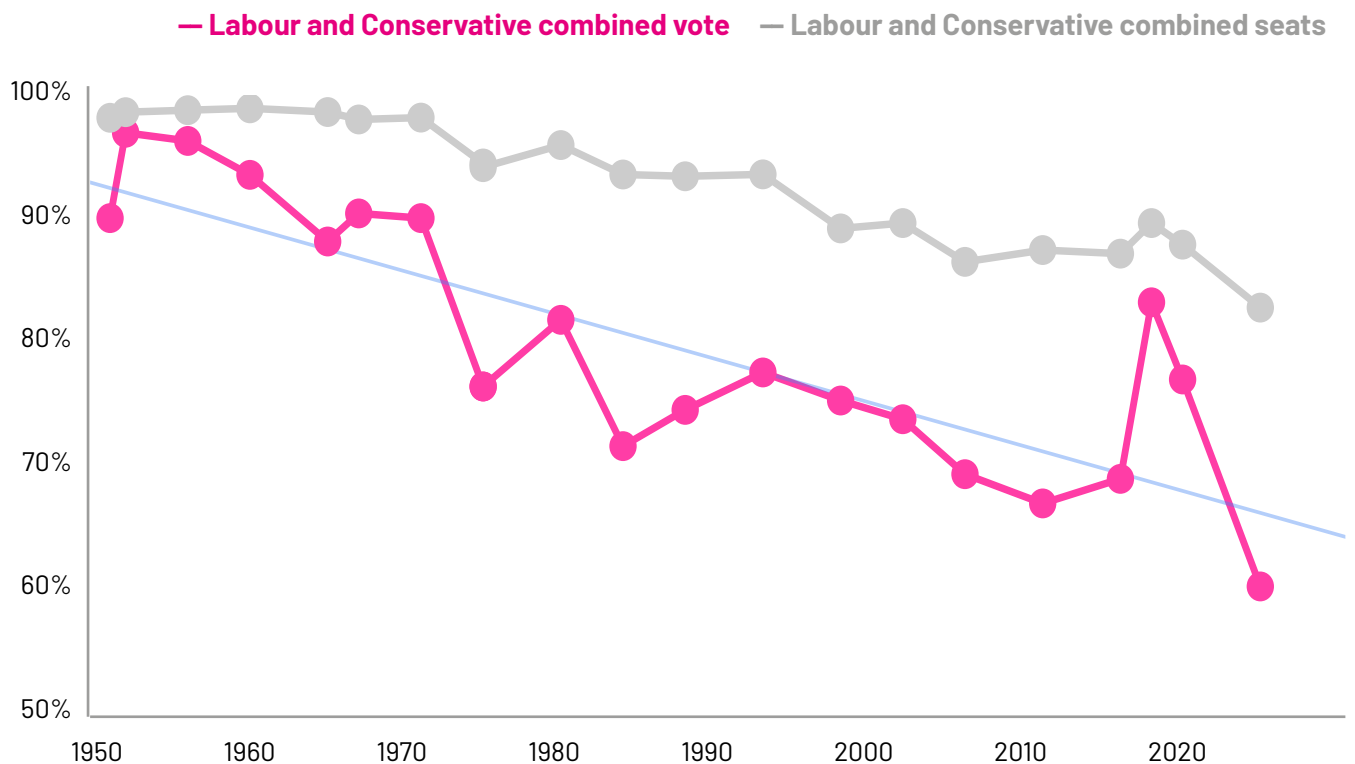
Falling turnout

Participation in elections in the UK has been on a steady downward trajectory since its high point in 1950, falling below 60% for the second time in history in 2024. However, the true extent of voter disengagement is concealed by voter registration levels, which have also fallen. The IPPR estimates that turnout amongst everyone eligible to vote was 52.8%, far below the previous low of 57.7% in 2001⁴⁶. Furthermore, the IPPR finds that “constituencies where a large share

of the population are older people, wealthy homeowners and white had much higher turnout rates than constituencies where a smaller share of people come from those communities”. This is in part a reflection of the primacy FPTP places on swing voters in marginal constituencies, the resulting political priorities and strategies, and the disengagement this provokes in other demographics.

There is extensive evidence that voter turnout tends to be significantly higher with PR than with winner-takes-all systems. Studies consistently find that PR elections have 5-8% higher turnout, relative to the same election held under FPTP⁴⁷. By making votes count wherever they are cast, PR would give every voter in Britain a real voice in every general election, regardless of where they live or who they vote for.

In contrast to FPTP, this would give politicians and parties a powerful incentive to win over voters from all demographics in every part of the country.



▲ **Figure 3: Combined two-party vote share and seat share**

Decaying two-party system

In the 1950s it was common for well over 90% of voters to vote for either Labour or the Conservatives. By 2024, this figure fell to just 58%. The only significant deviation from this decades-long trend was the extreme polarisation of the Brexit years and the “ersatz two party politics”⁴⁸ that it created. As Rob Ford noted recently, “the disintegration of party competition recommenced the day Boris Johnson achieved his oft-repeated goal to *Get Brexit Done*”⁴⁹ and in 2024 fell below 60% for the first time.

FPTP does everything it can to coerce voters into voting for a two-party system by suppressing the representation of third party voters. At every election since 1950, FPTP has ensured that the vast majority of votes for a party other than Labour or the Conservatives have been ‘wasted’. That more and more voters have consistently refused to vote for either of the biggest two parties despite being punished for doing so reveals the depth of dissatisfaction

with the electoral system and the limited choice it attempts to impose.

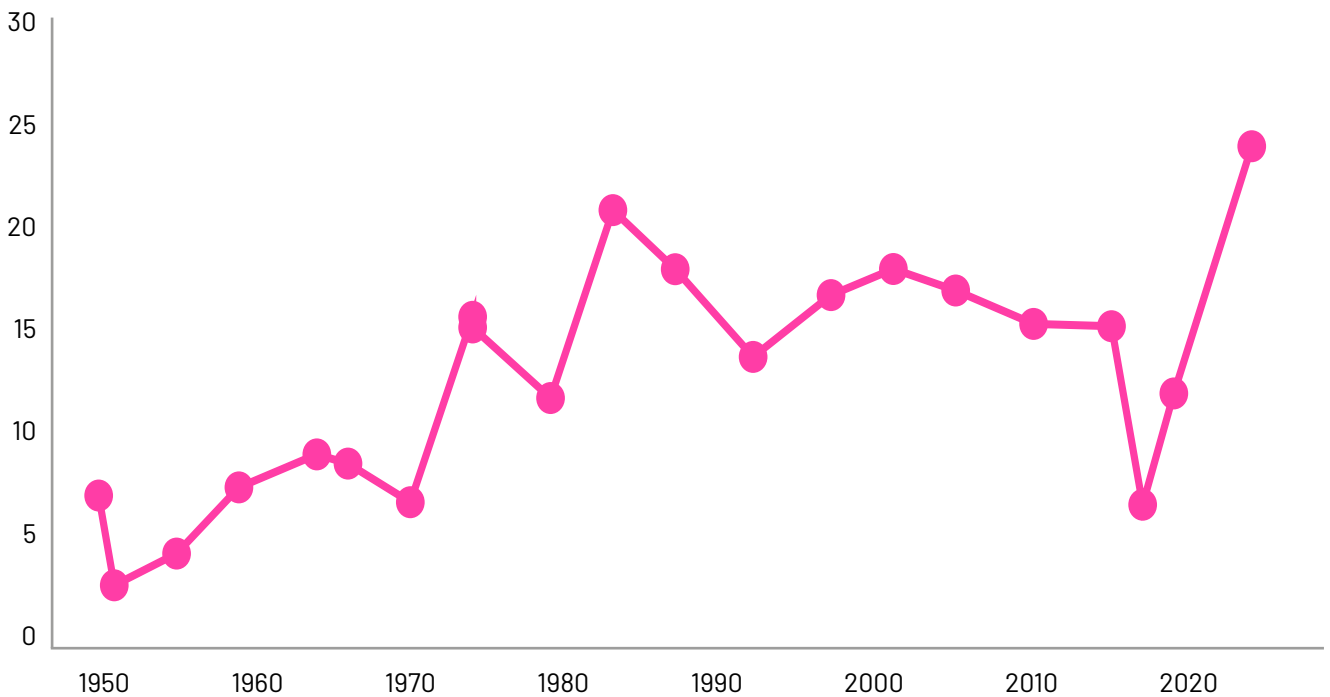
Rising disproportionality

As fewer and fewer people vote for the largest two parties, but the share of seats they receive remains stubbornly high, the result is disproportionality. This has been steadily rising since 1950, again punctuated only by the aberration of the Brexit years.

The higher the disproportionality the more obvious it is to the electorate that their votes are not fairly reflected by the electoral system. The current record high disproportionality takes the UK into uncharted territory (see Figure 4).

Dwindling mandates

Extreme disproportionality has serious implications for who is able to wield power in the UK, with what level of public support and what mandate. As the two-party system has waned and disproportionality has grown, the outcomes



▲ **Figure 4: Rising disproportionality of UK elections (Gallagher index)⁴⁹**

of general elections have become increasingly volatile and capricious. As a result successive governments have been able to secure a majority of seats on a smaller and smaller vote share.

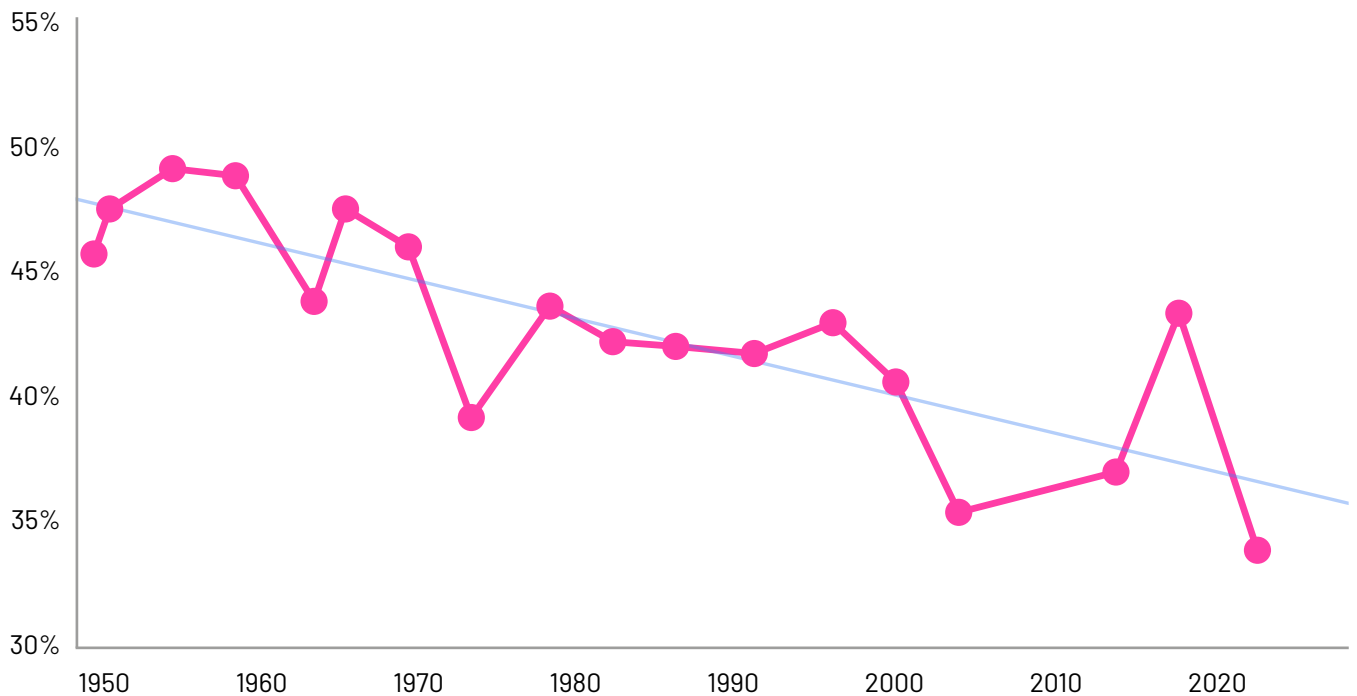
No single party has received a majority of the vote since before World War II, but between 1950 and 1970 parties that won a majority of seats typically did so on the basis of over 45% of the vote. The vote share needed to win a majority has been in gradual decline ever since, with both Labour and the Conservatives winning majorities with 35.2% and 36.9% respectively in the 21st century, and Labour doing so in 2024 with just 33.6%. If this trend continues, we can expect to see majority governments elected with less than a third of the vote, or even less than 30%, in future general elections.

Handing absolute power to a party so few people voted for calls into question the democratic legitimacy of the election. It also represents a genuine danger. When the bar for unfettered power is set so low, it becomes more

likely that extreme or anti-democratic parties could reach it. If the threshold continues to fall, extreme voices continue to influence politics, and support for mainstream parties continues to fall, there is a real risk that FPTP opens the door to a dangerous majority government with minimal public support. This becomes all the more likely when disillusionment with politics is rising, in no small part because people's votes are repeatedly ignored on an industrial scale.

Increasing political instability

One of the supposed arguments for FPTP is that it delivers clear winners and majority government. However, while there was just a single hung parliament between World War II and the turn of the century, this period is the anomaly. The 21st century has seen two hung parliaments in half that time and there were five hung parliaments between 1900 and 1935. There is every chance FPTP will deliver more hung parliaments in Britain in the future.



▲ **Figure 5: Vote share securing a majority of seats**

More importantly, there is no real evidence that single party majority government has a stabilising effect on a country’s politics. As the decline of FPTP has continued, it has become an increasingly erratic and volatile driver of instability in British politics. Holding a majority of seats, no matter how large, has not translated to stable government in recent years. Instead, majority governments have frequently been prone to internal conflict, at times including mass defections or suspensions, and have been unrestrained in making ineffective or damaging decisions on a partisan or ideological basis. The only Prime Minister to have completed a full term in office in the last two decades is David Cameron, during his premiership of the 2010-2015 coalition.

In fact, the most stable democracies worldwide all use proportional systems in which a single party almost never holds a majority of seats. PR tends to deliver coalition governments that are anticipated and planned for in advance,

drawn from a parliament that reflects how the public voted, and represent a majority of voters. A study by Make Votes Matter and Dylan Difford⁵¹ examined 17 parliamentary democracies over 50 years and found that countries with PR generally outperform those with winner-takes-all systems on eight out of ten measures of political stability, including government durability, ministerial and prime ministerial turnover, and early election frequency.

c. The new consensus on First Past the Post

It is clear that FPTP is a major factor in the public perception that Britain’s political system is not working properly, that it does not serve the national interest, and cannot be trusted to deliver change for ordinary voters. Voters increasingly understand that the electoral system is a major factor in this and there is

record high support for changing to PR. Parties holding an overwhelming majority of seats in the House of Commons believe FPTP is harmful to democracy. This broad consensus that the current system is flawed is the starting point for addressing it.

Public support for PR

During the general election campaign it was announced that the long running British Social Attitudes (BSA) survey had found record, majority support for changing the voting system⁵². This is the culmination of steadily increasing support since the turn of the century. The BSA found that support for changing the system overtook the status quo during the last parliament. YouGov has consistently found the same since it began its tracker in November 2019⁵³ and also found record and majority support in a separate survey on the eve of polling day, with 54% in favour of PR and just 16% opposed⁵⁴.

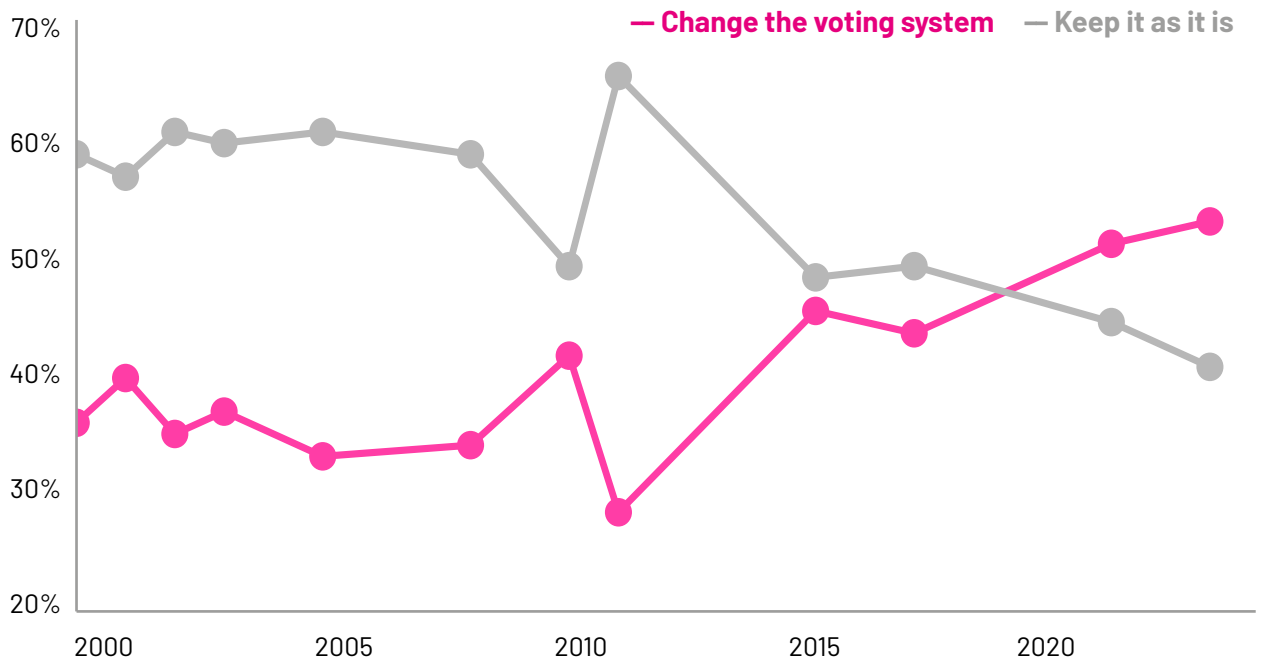
Importantly, the BSA shows that people with lower levels of trust and confidence in Britain's political system are significantly more likely to support a change in the voting system. Among those who 'almost never' trust governments, 62% are found to be in favour of change, as are 60% of those who think our system of government could be improved⁵⁵. In keeping with this, international comparisons have confirmed that countries with winner-takes-all systems like FPTP have significantly lower satisfaction with democracy than those with PR⁵⁶.

When asked which out of a broad range of tangible democratic reforms "would have the biggest positive impact on Britain's political system", introducing a proportional electoral system is by far the most popular answer⁵⁷. All six of the voter segments identified by Labour Together as making up the British electorate chose electoral reform over Lords Reform, enhanced devolution, use of citizen's assemblies, or greater use of referendums - to name just a few.

PR IN THE UK

Proportional electoral systems have been used successfully for elections in the UK's devolved Parliaments and assemblies since the turn of the century. This includes versions of the Additional Member System (AMS) in the Scottish Parliament, Welsh Senedd and London Assembly, and the Single Transferable Vote (STV) in the Northern Ireland Assembly. STV is additionally used for local elections in Scotland and Northern Ireland, with Welsh principal councils now able to adopt the system for their own elections. The Welsh Senedd will also move to a new form of list PR for its next election following 2024 legislation.

The use of proportional systems which retain a close constituency link across the UK makes Westminster's use of FPTP the outlier rather than the norm. Over 80% of democracies use some form of PR, while the only other country in Europe to use FPTP is Belarus.



▲ **Figure 6: Support for changing the voting system.** British Social Attitudes survey

	Total	Activist Left	Centrist Liberals	Disillusioned Suburbans	English Traditionalists	Patriotic Left	Rural Right
Changing the voting system to one where the parties gain seats in Parliament in proportion to the number of votes cast for them	34%	46%	37%	29%	28%	30%	32%
Having more decisions made by citizens assemblies, where a group of people are randomly selected from the public and deliberate on an issue	21%	22%	19%	23%	22%	26%	14%
More decisions being made by devolved and local governments rather than in the UK parliament	21%	17%	21%	22%	17%	21%	17%
Abolishing the House of Lords and only having the House of Commons	19%	14%	16%	17%	20%	28%	32%
Having more decisions made by nationwide referendums	19%	14%	20%	22%	19%	22%	19%
Reforming the House of Lords so all the members are directly elected in nationwide elections	18%	19%	18%	16%	21%	16%	19%
Making it compulsory to vote in General Elections with fines for people who don't	13%	12%	14%	9%	17%	16%	17%
Lowering the voting age so that 16 and 17 year olds can vote	11%	18%	11%	12%	8%	7%	4%
None of these	5%	3%	7%	6%	6%	4%	9%
Don't know	9%	11%	8%	11%	7%	8%	5%

▲ **Figure 7: How to improve Britain's political system (split by Labour Together voter segment).** Reproduced from *A Peerless Democracy, Labour Together (2023)*

Political consensus against FPTP

While most parties in the House of Commons⁵⁸ are already committed to introducing PR, there is far larger consensus that FPTP is a problem. Labour’s official policy, agreed in 2023⁵⁹, is that:

“The flaws in the current voting system are contributing to the distrust and alienation we see in politics”

Taken together, parties representing 77% of MPs - 500 seats - agree that FPTP is a flawed system for general elections which is damaging to trust in British democracy.

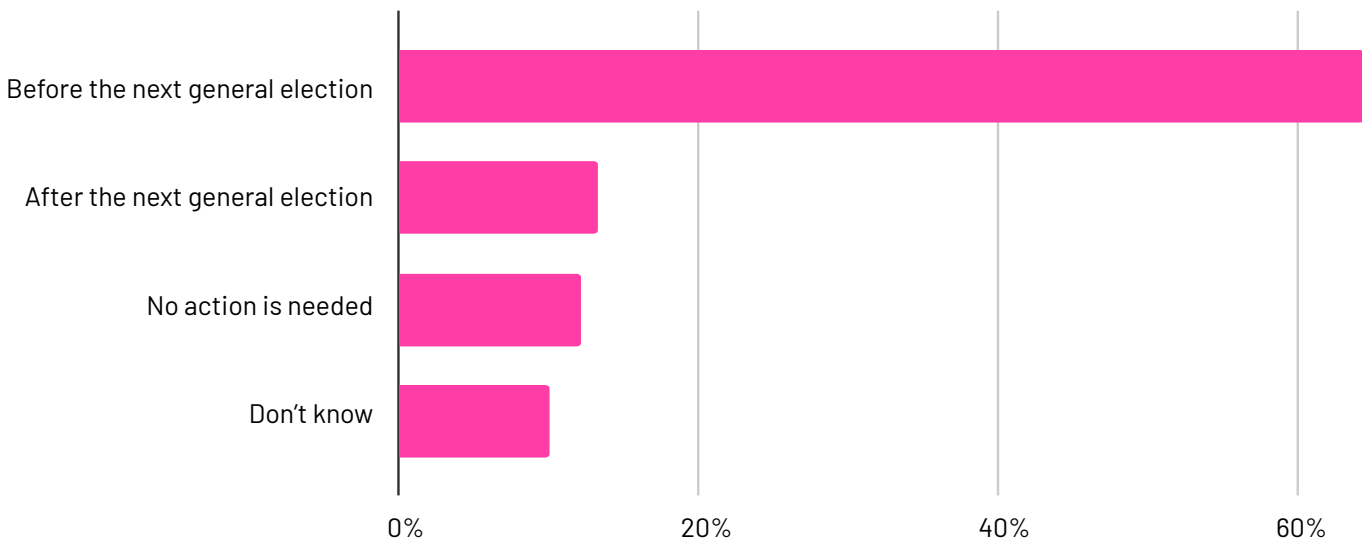
New polling conducted for this report by Survation has found that almost two thirds (64%) of the public believe the government should act to address the flaws in the voting system before the next general election⁶⁰.

With the Prime Minister declaring “the fight for trust is the battle that defines our age,” it is unsustainable for the government to ignore Britain’s flawed electoral system, which continues to erode trust and alienate people from the democratic process.

500 seats in the House of Commons (77%) are held by parties which agree that FPTP is “flawed and damaging trust in politics”



▲ **Figure 8: The new consensus on First Past the Post**



▲ **Figure 9: When do you think the government should act to address the flaws in the current voting system?** Survation / Fair Vote (2024)

RECOMMENDATION 1

A National Commission for Electoral Reform

The APPG for Fair Elections calls on the government to establish a National Commission for Electoral Reform. Taking as its starting point the broad consensus that First Past the Post is flawed and damaging trust in politics, its purpose should be to recommend a fair and democratic voting system in which every vote counts equally.

The National Commission must be independent, authoritative and highly representative; allowing citizens, alongside experts, to evaluate the options, draw insights from the UK's devolved bodies and other democracies, and recommend a new system for modern Britain that would command public trust and confidence.

It should be established in 2025 in order to report to Parliament in good time for its recommendations to be progressed within the current parliamentary term.

THREAT 2

DARK MONEY & HIDDEN INFLUENCE

Public concern over unaccountable money and influence in British politics is growing. Increasing sums are flowing into political campaigns, enabled by loopholes that allow spending limits and transparency rules to be sidestepped.

A weakened Electoral Commission (EC) lacks the independence and authority to regulate campaign finance effectively, while lobbying and other hidden influences have become pervasive due to weak transparency-based regulation, conflicts of interest, and certain second jobs held by politicians.

a. Growing perceptions of corruption

In 2023, the UK reached its lowest-ever score on Transparency International's Global Corruption Perceptions Index⁶¹, reflecting decades of lobbying and donation scandals. Only 13% of Britons view campaign finance as sufficiently transparent⁶², and only 17% trust the British electoral system to be safe from corruption or fraud. Perhaps most tellingly, nine out of ten political lobbyists and public relations

professionals say that there should be more transparency over who is lobbying Westminster politicians⁶³.

As discussed above (*The collapse of trust in British politics*), nearly three quarters of Britons now believe that the government is "rigged to serve the rich and influential."⁶⁴ As trust in politics wanes, Britons increasingly question whose interests their representatives serve. As of last year, more than eight in ten people believed politicians grant policy favours in exchange for lucrative job offers, up 20% from 2021⁶⁵. Most people are now more likely to link economic crime to politicians rather than business executives or oligarchs⁶⁶, a perception particularly strong amongst younger age groups. (See Figure 10).⁶⁷

As the Hansard Society have argued, a general public who view the government as "rigged" is susceptible to anti-democratic messaging and "strongman" leaders. According to campaigners at Hope Not Hate, suspicion of politicians creates "fertile ground for a far-right populist surge"⁶⁸, risking particularly severe consequences when coupled with FPTP.

b. Dark money loopholes

Growing perceptions of corruption have coincided with a substantial influx of private cash - both disclosed and undisclosed - into British political campaigns. Parties reported over £93 million in political donations in 2023⁶⁹, the second highest annual figure on record, beaten only by 2019, a general election year which saw over £113 million in reported donations⁷⁰. In the second quarter of 2024, as the General Election approached, the Electoral Commission reported an unprecedented £55 million in donations⁷¹.

The UK's campaign finance regulations are intended to prevent excessive influence through transparency, yet several critical gaps allow funds to slip through unnoticed.

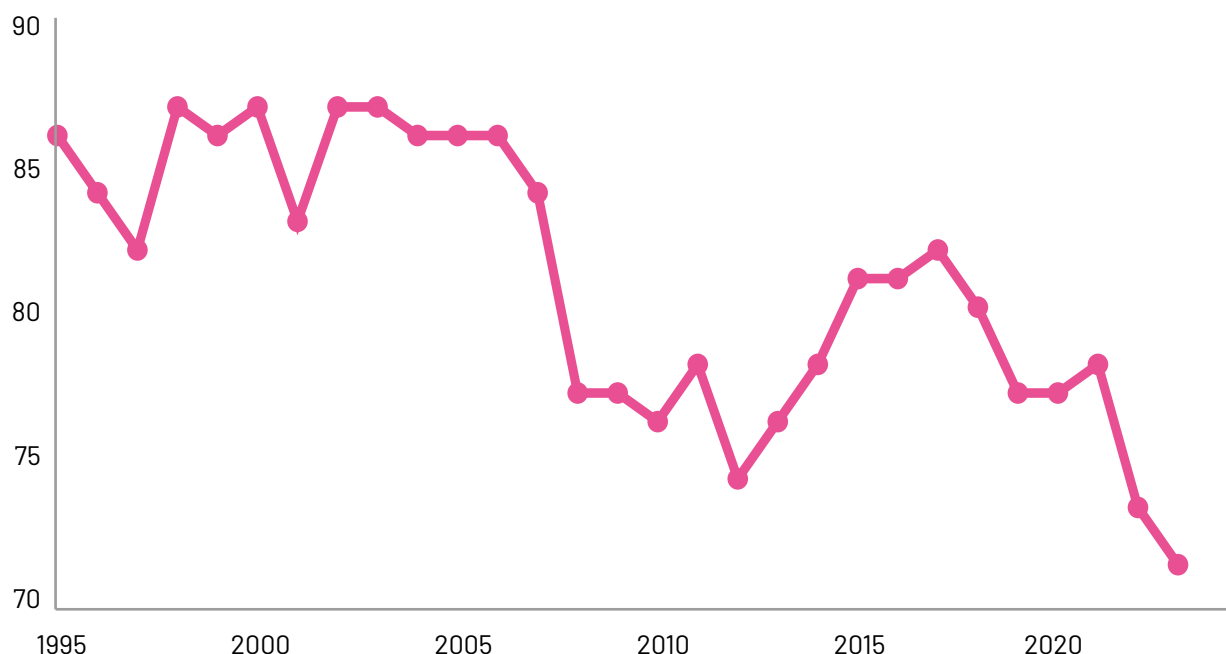
Donations exceeding £500 (the level at

WHAT IS DARK MONEY AND HIDDEN INFLUENCE?

Dark money: Funds from unknown sources that enter the political process, often by exploiting loopholes in campaign finance law.

Hidden influence: Undisclosed lobbying and pressure groups that influence elections and government decisions, often funded through undisclosed sources.

INFLUENCE



▲ **Figure 10: UK's Corruption Perceptions Index rating over time.** Source: Transparency International

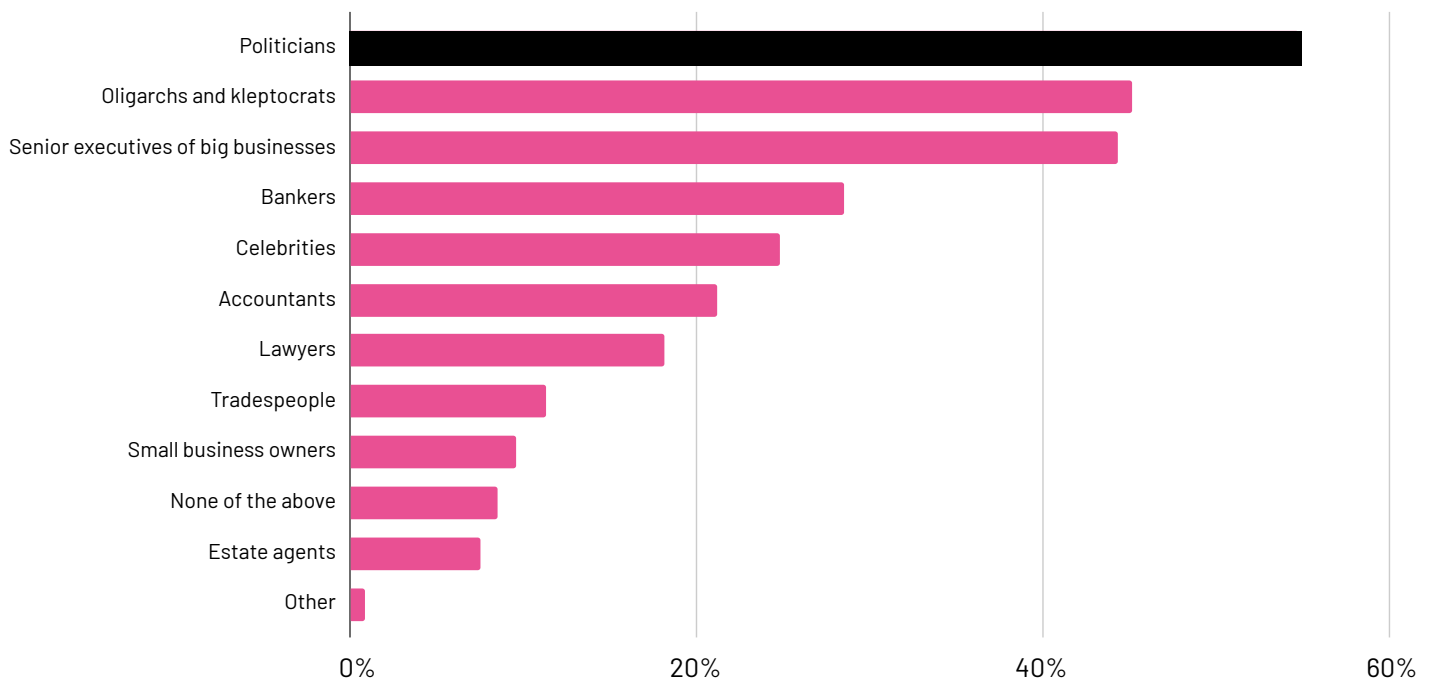
which reporting is required) must come from “permissible” sources, including UK-registered companies, LLPs, trade unions, unincorporated associations, building societies, and other groups, as well as individuals on the UK electoral roll (including overseas electors)⁷². However, there is no upper limit on donation amounts, and little scrutiny is applied to verify the ultimate source of these funds.

Campaign spending limits for Westminster elections have also been adjusted, with the national spending cap increased from £19 million to £36 million⁷³. While these limits are intended to restrict the amount of donor funds parties can use to influence election outcomes, in practice the goalposts have been moved to allow parties to use the increased funding to which they have access. The current regulatory framework emphasises transparency, but it lacks the more robust limits found in other countries on individual and corporate donations. Notably, the threshold at which donations must be publicly disclosed has risen from £7,500 to £11,180⁷⁴,

leaving lower donations entirely unchecked and potentially originating from unknown sources. Donations below £500 are not checked for permissibility or origin⁷⁵.

The most critical failure of the transparency regime lies in a number of major loopholes for certain categories of permissible donors, including **unincorporated associations, shell companies, and proxy donors**. These entities are not required to disclose the true origin of their funds, even when donations are publicly reported. The regulatory framework for political donations has seen no significant updates in over two decades⁷⁶.

These donation loopholes also leave the UK particularly exposed to foreign influence. As the Bureau of Investigative Journalism argues, political parties’ growing reliance on “war chests” of campaign finance provides an incentive for non-permissible donors to break the rules⁷⁷. These potentially include countries currently under sanctions, nations involved in war crimes and human rights abuses, arms manufacturers



▲ **Figure 11: The public increasingly associates politicians with economic crime.** Percentage shows % who associate each profession with economic crime. Source: Survation

and tobacco giants, and foreign corporations opposed to the national interest.

A number of different vehicles have been identified as being used for the illegal transfer of funds to political parties, the most common of which are set out below.

Unincorporated Associations (UAs)

An Unincorporated Association is a broad category of organisation that includes everything from sports clubs, to volunteer bodies, to political parties - many of which play important roles in communities across the country. However, UAs can also be used as vehicles for political donations from obscure sources. Under current electoral law, tracking the origin of funds flowing through UAs is nearly impossible, leaving campaign finance vulnerable to hidden influence. Entities involved in campaign donations include private member clubs and opaque societies that do not fall into any other category of donor. According to Byline Times, 29 opaque UAs have

donated over £30 million to political parties between 2010 and 2022⁷⁸. Two more recent examples include:

- The Covid Recovery Group:** This anti-lockdown group received tens of thousands of pounds from a UA called the Recovery Alliance, an organisation with no digital footprint and fully anonymous finances and membership. openDemocracy has linked Recovery Alliance to other anti-lockdown groups, that they allege was used to bypass donation rules⁷⁹.

- The Constitutional Research Group:** With only one listed member, this UA donated £435,000 to the DUP's Brexit campaign. The funding source remains unclear, though openDemocracy speculates it may be connected to illegal dumping, arms sales, or other questionable sources⁸⁰.

Shell companies

A "shell company" is a limited liability company (LLC), limited liability partnership (LLP),

or similar legal structure used to channel political donations anonymously. Transparency International found that 14% of LLPs established in the UK between 2001 and 2021 – around 21,000 companies – raise red flags as potential shell companies⁸¹. High profile examples of the use of shell companies include:

•**Lubov Chernukhin**: A top Conservative donor, Chernukhin has given over £2 million to the Conservative Party. In 2022, the BBC reported she had once served as director of an offshore company secretly owned by Suleiman Kerimov, a Russian senator and sanctioned oligarch⁸². This shell company is alleged to have supplied her with the funds for a permissible donation⁸³.

•**MPM Connect**: In early 2023, several Labour frontbenchers received donations from this private limited company described as an “investment” firm. The company has no website or public contact information, raising transparency concerns⁸⁴.

•**Aquind & Co**: This offshore energy firm, co-owned by Russian oil magnate Viktor Fedotov and former Russian arms manufacturer Alexander Temerko, has donated at least £1 million to the Conservative Party⁸⁵.

Proxy donors

Proxy donors are individuals who are legally permitted to donate in the UK but receive funds from sources that are not permissible, acting as intermediaries to channel these funds into political campaigns.

The case of Ehud Sheleg, an art dealer and former Conservative Party Treasurer, underscores the need for stronger oversight. Sheleg donated over £630,000 to the Conservative Party, but Barclays raised concerns, flagging the donation to the National Crime Agency due to suspected money laundering. Subsequent documents revealed that the money originated from a Russian bank account belonging to Sheleg’s father-in-law, a former official in a pro-Putin regime in Ukraine⁸⁶. Due to existing legal gaps, there was no mechanism to

hold anyone accountable for this donation.

This case exemplifies the transparency challenges associated with proxy donations and highlights the urgent need for reforms to ensure that donations originate from legitimate, permissible sources. By tightening regulations around proxy donors, the UK can bolster safeguards against foreign influence and ensure greater integrity in its political donation system.

c. A weakened Electoral Commission

The Electoral Commission (EC) is the primary regulator of campaign finance in the UK, responsible for issuing guidance to parties, overseeing political donations, and determining donation permissibility. The Commission’s effectiveness relies heavily on its independence from government, its ability to monitor political finance, and adequate resources to enforce compliance.

In 2021, Fair Vote warned that the Electoral Commission was in urgent need of strengthening. Its report, *Defending Our Democracy in the Digital Age*⁸⁷, called for increased regulatory powers, including the authority to prosecute violations and issue substantial fines. The report emphasised the importance of an independent EC to deter campaign finance breaches effectively.

However, recent legislative changes have instead eroded the EC’s autonomy. The Elections Act 2022 made the Commission answerable to a Parliamentary Speaker’s Committee, which the government can influence, and subjected its decisions to a Strategy and Policy Statement issued by the Secretary of State for Levelling Up, Housing, and Communities (now the Department of Housing, Communities, and Local Government). Additionally, the Act stripped the EC of its prosecutorial powers, diminishing its capacity to enforce campaign finance rules fully. This shift has drawn strong opposition.

The Electoral Commission Board argued:

“It is our firm and shared view that the introduction of a Strategy and Policy Statement – enabling the Government to guide the work of the Commission – is inconsistent with the role that an independent electoral commission plays in a healthy democracy. This independence is fundamental to maintaining confidence and legitimacy in our electoral system.”⁸⁸

The weakening of the EC’s independence is troubling, as it risks exposing the UK to potential voter suppression and gerrymandering, issues that have posed significant challenges to democratic integrity elsewhere in the world. At a time when public confidence in politics is low, a robust and independent regulatory body is crucial to ensure fair and transparent electoral practices. While existing donation regulations are limited, even once new rules are introduced they will require an empowered EC to enforce them impartially, without fear or favour.

d. Lobbying and hidden influence loopholes

The rise in lobbying activities has paralleled growing perceptions of corruption in UK politics, with associated scandals highlighting the influence of corporate and special interests. A 2007 report by the Hansard Society, the most recent comprehensive study on lobbying in the UK, estimated the lobbying industry’s value at £1.9 billion, with MPs reportedly approached by lobbyists as many as 100 times per week⁸⁹. With the surge of money in politics over the past two decades, commentators argue that lobbying has only intensified⁹⁰.

In 2023, the Conservative government reportedly met with oil and gas lobbyists an average of 1.4 times per working day⁹¹. Similar concerns have surfaced with the current government, as Labour faced criticism for holding a record number of meetings with lobbyists during the 2024 election campaign⁹²

and for several media scandals involving corporate “freebies”⁹³.

However, the current lobbying rules apply only to government ministers, leaving opposition parties, backbench MPs, and Peers beyond the reach of transparency requirements. As a result, the public remains unaware of the interests attempting to influence opposition parties, such as Labour or the Liberal Democrats, during past campaigns, including the 2017, 2019, and 2024 general elections⁹⁴. The same transparency gaps mean there is limited public insight into who may be lobbying the Conservative Party as it prepares for future elections.

Investigative journalist and dark money specialist Peter Geoghegan has argued that lobbying rules in the UK “basically don’t exist.” Indeed, a number of loopholes in lobbying oversight allow powerful interests to influence policy and political decisions with little accountability, raising public concerns about undue influence and corruption in politics.

The lobbying register is unfit for purpose

The UK’s lobbying register is intended to provide transparency by recording meetings between lobbyists and government ministers. In practice, however, it falls short.

Although meetings are catalogued, the nature of the meetings remain undisclosed. Transparency International describes the lobbying register as providing “almost no useful insights into what’s being discussed”, highlighting that numerous meetings are described in very vague terms such as “to discuss trade and investment”⁹⁵.

Informal lobbying – such as communications over text, email, or other non-official channels – is not recorded at all. Additionally, the register does not cover interactions between lobbyists and MPs who are not government ministers, leaving a substantial gap in public accountability. Transparency International estimated in 2015 that only 4% of actual lobbying activity appears on the register⁹⁶.

Recent reviews of Westminster's lobbying practices, including reports by the Committee on Standards in Public Life⁹⁷ and Nigel Boardman's review of the Greensill lobbying affair⁹⁸, have both called for "radical improvement" in how lobbying activities are reported. Despite these calls, the current register still lacks the comprehensiveness needed to ensure transparency and accountability.

Examples of lobbying activities slipping through the transparency net include:

- The Greensill Scandal:** Former Prime Minister David Cameron lobbied ministers, including then-Chancellor Rishi Sunak, via text to secure Covid loan scheme access for financial services company Greensill. These messages were not reported in any transparency filings⁹⁹.
- The Institute of Economic Affairs:** In early 2023, documents revealed that an opaquely funded libertarian think tank connected to Liz Truss held over 70 meetings with cross-party MPs in the months leading up to her Conservative leadership win. While the meetings were recorded, their content was not disclosed¹⁰⁰.
- The Carbon Capture and Storage Association:** According to DeSmog, Labour frontbenchers held 16 meetings with the Association between 2023 and 2024, which includes executives from fossil fuel companies on its board¹⁰¹. Shortly afterward, Labour announced a £22 billion investment in carbon capture and storage.

There are further limitations of lobbying rules which enable potential sources of political influence to remain hidden. For instance, in August 2024, openDemocracy revealed that corporate lobbyists from private healthcare and fossil fuel sectors had contributed to Labour's general election campaign, yet they were exempt from disclosure because they had not received payment for their lobbying work¹⁰².

Second jobs and conflicts of interest

Between 2017 and 2022, research shows that nearly one-third of ministers and senior public



The lobbying industry's value has been estimated at £1.9 billion, with MPs approached by lobbyists as many as 100 times per week"

officials sought employment in sectors they had previously regulated or overseen while in government¹⁰³. This trend has raised questions about potential conflicts of interest, with several high-profile examples illustrating the need for stricter controls and enforcement.

Recent instances include:

•**Boris Johnson's Daily Mail Role:** In 2023, Boris Johnson took a high-paying position as a regular columnist for the *Daily Mail*, providing only 30 minutes' notice to the business appointments committee before accepting the job¹⁰⁴.

No penalty was imposed despite what the committee called a "clear breach" of the rules.

•**Lord Walney and multiple conflicts of interest:**

In October 2024, the Good Law Project and Compassion in Politics sent a dossier to the Lords commissioner for standards which they claim shows "a commercial interest in organisations whose clients have been targeted by the very protesters whose activities he seeks to ban"¹⁰⁵.

•**Nadine Dorries' TalkTV Position:** In 2023 Nadine Dorries became a late-night host on TalkTV without consulting the business committee. Details of her compensation remain undisclosed, and no penalty was issued for bypassing the usual protocols¹⁰⁶.

"Giftgate" and public concerns about cash for access

In August 2024, public and media scrutiny intensified around issues of "cash for access" following revelations that major Labour donor Baron Alli had received a Downing Street security pass¹⁰⁷. Over the subsequent weeks, several "freebies" controversies emerged, involving gifts to new government ministers such as concert tickets, designer clothing, luxury accessories, hospitality, and more¹⁰⁸. Although all of these gifts were legally declared according to lobbying rules, public opinion strongly opposed them. A September poll found that around two thirds

of Britons considered the gifts somewhat or completely unacceptable¹⁰⁹. Additionally, Three quarters of respondents felt it was inappropriate for the Prime Minister to accept gifts from businesses or organisations, while two thirds disapproved of gifts from individuals¹¹⁰.

These incidents underscore that the current lobbying rules, even when properly adhered to, are insufficient to maintain public trust in ministers and MPs. As highlighted above in *Growing perceptions of corruption*, there is a pressing need for enhanced safeguards to assure the public that democratic processes serve the interests of voters, rather than being unduly influenced by wealthy benefactors.

Too late to matter - reporting delays

Transparency advocates have raised concerns about the timeliness of departmental lobbying reports, arguing that delays undermine accountability. Transparency International has highlighted that tardiness in publishing these reports weakens their effectiveness, as timely disclosure is essential for public trust and oversight. Some departments' transparency reports have been delayed by over ten months, leaving significant "information black holes" in the reporting process.

These delays in transparency data mean that the public lacks up to date insights into lobbying activities and influence over policy decisions. Such gaps hinder accountability and allow potential conflicts of interest to go unchecked.

RECOMMENDATION 2

Close donation loopholes and strengthen the Electoral Commission

The government must review and strengthen all provisions governing vehicles used to channel donations, including unincorporated associations, shell companies, and proxy donors. These changes would represent the first significant reforms to campaign finance rules since 2000, enabling the public to see exactly what funds enter British politics, from where, and to whom. Importantly, the Electoral Commission has confirmed that these reforms would not affect trade unions' ability to donate to political parties or hinder local party funding.

In order to enforce the closure of these loopholes, new legislation must restore the independence, authority, and integrity of the Electoral Commission. This requires rolling back the changes introduced in the 2022 Elections Act, which compromised the Commission's operational autonomy and removed its prosecutorial powers.

Combined, these reforms would signal that the government is committed to addressing widespread public concerns about corruption and the influence of money in politics.

THREAT 3

DISINFORMATION

Public distrust in both legacy and new media is weakening the foundation of informed political debate in Britain, including around election campaigns. A lack of media pluralism, ineffective regulation, and partisan influence over the public service broadcaster have compromised traditional media's role. Meanwhile, the business models of new media platforms incentivise them to amplify false and divisive content through algorithms that lack accountability. The UK lags behind other nations in regulating 'legal but harmful' content, disinformation campaigns, and data-driven political advertising.

a. Widespread distrust in the information environment

A healthy media environment is foundational to a functional democracy, as voters must have access to reliable information on political parties and policy proposals to make informed choices. However, in recent years, Britain's information landscape has been severely strained. Both legacy and digital media increasingly host biased, sensationalised, and often misleading content. Commentators' financial or partisan interests are frequently undisclosed¹¹¹, nuanced issues are oversimplified¹¹², and business incentives drive sensational framing that weakens public debate¹¹³.

This landscape has significantly undermined public trust. Only 13% of Britons now have confidence in traditional media - a record low and among the lowest levels of trust globally¹¹⁴ (see Figure 12). Across the world, concerns about the impact of online disinformation are widespread¹¹⁵. In the UK, seven in ten people believe tech companies inadequately manage disinformation¹¹⁶, and a record number regard social media platforms as under-regulated, more so than any other industry¹¹⁷ (see Figure 13). Additionally, 80% of Britons agree that free speech should be balanced with measures to prevent extremist and harmful content online¹¹⁸.

b. The legacy media

A free and effective press is essential to democracy, as trusted, reliable reporting enables the public to hold politicians accountable at the ballot box. Prime Minister Keir Starmer recently affirmed the importance of "protecting journalism" and "championing press freedoms" to sustain British democracy¹¹⁹. However, today's media landscape in the UK is compromised by significant power imbalances, which limit its ability to fulfil this crucial role effectively.

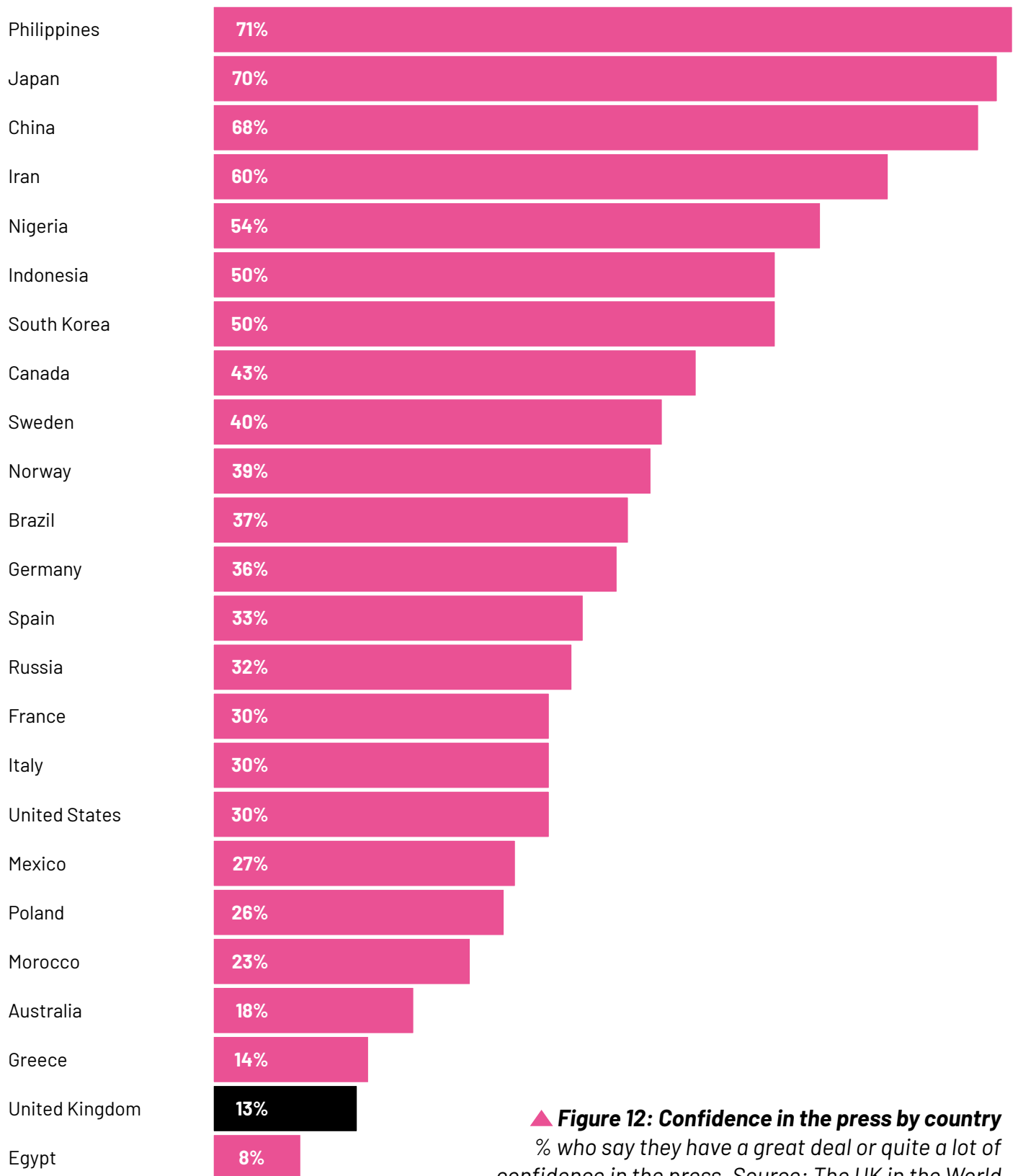
Legacy media has two core problems: a lack of media pluralism and a failure to enforce the rules through the regulatory framework

Lack of media pluralism

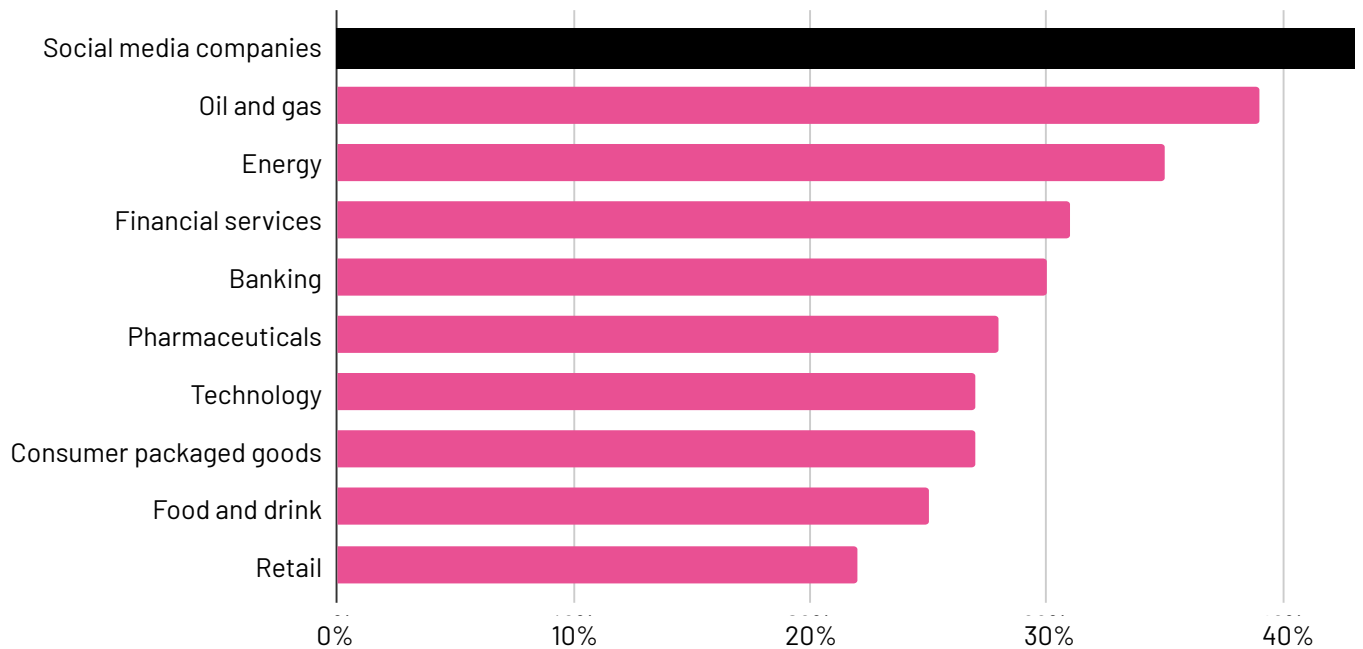
As of 2023, three companies control 90% of the national newspaper market in the UK, while six companies own 71% of the country's 1,189 local newspapers. This level of concentration grants these few corporations outsized influence over the national media landscape. According to the Media Reform Coalition, these three dominant publishers account for 40% of audience reach among the top 50 news brands, which heavily shapes the national news agenda.

Research indicates that high levels of media concentration hinder diversity in political, cultural, and social perspectives in reporting¹²⁰. More than nine in ten Britons believe news should come from more than one source, and that no single organisation should have too much control over the news¹²¹.

Media monopolies compromise the press's democratic role as the fourth estate, which is to hold power accountable, foster public debate, and provide essential information for citizens to participate meaningfully in elections and democracy more broadly. A more diverse and independent media landscape is necessary to uphold these democratic functions.



▲ **Figure 12: Confidence in the press by country**
 % who say they have a great deal or quite a lot of confidence in the press. Source: *The UK in the World* survey, Policy Institute, King's College London/ PressGazette



▲ **Figure 13: Industries perceived as under-regulated**

% who say there is too little regulation for each industry. Source: Ipsos Global Trustworthiness Monitor

Failure to enforce the rules

The UK's newspapers and broadcasters lack adequate regulation to ensure accountability. Following a major phone-hacking scandal, the 2011 Leveson Inquiry conducted a comprehensive review of the culture, practices, and ethics of the British press. It recommended establishing an independent regulatory system with powers to enforce penalties, facilitate arbitration, and require high-profile corrections and apologies for misconduct.

While Leveson's recommendations led to the formation of the Independent Press Standards Organisation (IPSO), this voluntary system was established by newspaper editors in order to self-regulate. IPSO's membership is optional and it lacks the authority to perform its role effectively. Subsequent governments have abandoned plans for Leveson Part 2, which would have further investigated the press's relationships with law enforcement and issues of

corporate governance. Consequently, practices among large national newspapers have often continued unchecked. In November 2024, polling found strong public support for resurrecting the inquiry.¹²²

In broadcast media, Ofcom's regulatory approach has been described as "light-touch"¹²³. Although Ofcom plays a critical role in licensing and upholding fundamental broadcasting standards, it has faced criticism for insufficiently addressing complaints about impartiality and accuracy. For example, in October 2024, Ofcom fined GB News £100,000 after it provided Prime Minister Rishi Sunak an unchallenged platform to promote government policies ahead of the general election¹²⁴. However, Ofcom's broader response to impartiality complaints, including those related to the providing MPs with political platforms¹²⁵ and the handling of climate science misinformation¹²⁶, has been criticised.

“Bad actors can exploit online platforms’ algorithms – or even benefit from owners’ biases – to spread divisive narratives”

c. Falling behind in the fight against online disinformation

For the first time, the majority of UK adults get their news online, primarily from social media rather than traditional news publishers¹²⁷. This shift has created major new risks to the integrity of information. New media platforms, structured around surveillance and targeted advertising, are designed to shape and influence user behaviour for profit¹²⁸, but operate with limited oversight, transparency, or accountability. Consequently, online debate now heavily relies on powerful, profit-driven organisations that have no formal obligation to uphold democratic values. Bad actors can exploit platform algorithms – or even benefit from platform owners’ biases¹²⁹ – to spread divisive, fear-inducing narratives, isolating users into ideological echo chambers and fuelling political and social divisions.

There is growing international recognition

of the dangers of disinformation, as it weakens democratic institutions and erodes trust by amplifying pre-existing social fractures¹³⁰. The UK signed the White House’s Declaration for the Future of the Internet in 2022, committing to promote an internet that supports democracy, human rights, and freedom. However, the UK’s follow-through has been limited, and it now lags behind other countries that are proactively addressing the threat disinformation poses to democratic stability¹³¹:

•**Brazil:** The Brazilian Supreme Court took strong action by banning X (formerly Twitter) nationwide after the platform failed to comply with court orders regarding disinformation moderation, even freezing Elon Musk’s assets in Brazil to enforce compliance¹³².

•**United States:** A recent ruling from the US Third Circuit Federal Court held that TikTok can be held liable for algorithmically amplified harmful content¹³³, signalling a possible shift

away from previous protections that shielded tech companies from accountability over their algorithms¹³⁴.

•**European Union:** The EU's 2024 Digital Services Act prohibits targeted advertising based on protected characteristics like race, religion, and political affiliation. It also mandates platforms to publish detailed transparency reports, including assessments on disinformation risk.

While countries worldwide are stepping up social and new media regulation, the UK risks falling behind. Below, we examine some of the main areas in which action is needed:

'Legal but harmful' content

The 2023 Online Safety Act (OSA) imposed new responsibilities on new media platforms, primarily to protect children and adults from illegal or harmful content. However, the act ultimately lacks provisions to address the impact of disinformation, nor does it consider content that, while technically legal under free speech guidelines, can cause harm to individuals, society, or democracy.

By omitting 'legal but harmful' content, the OSA misses a significant category of damaging information, leaving the UK unprepared for major disinformation incidents. Examples of such incidents include the wave of false information that fuelled riots across the UK in summer 2024¹³⁵, the election conspiracy theories that led to the January 6 insurrection in the US¹³⁶, and the COVID-19 disinformation that jeopardised public health during the pandemic¹³⁷. Additionally, fake news - often permitted under free speech laws - erodes trust and intensifies social divides. Currently, platforms are not mandated to assess the risks associated with 'legal but harmful' content, a requirement that does apply to illegal content under the OSA. This gap leaves the UK without a comprehensive framework to mitigate the potential harm of disinformation and other divisive content.

Echo-chambers and coordinated online disinformation

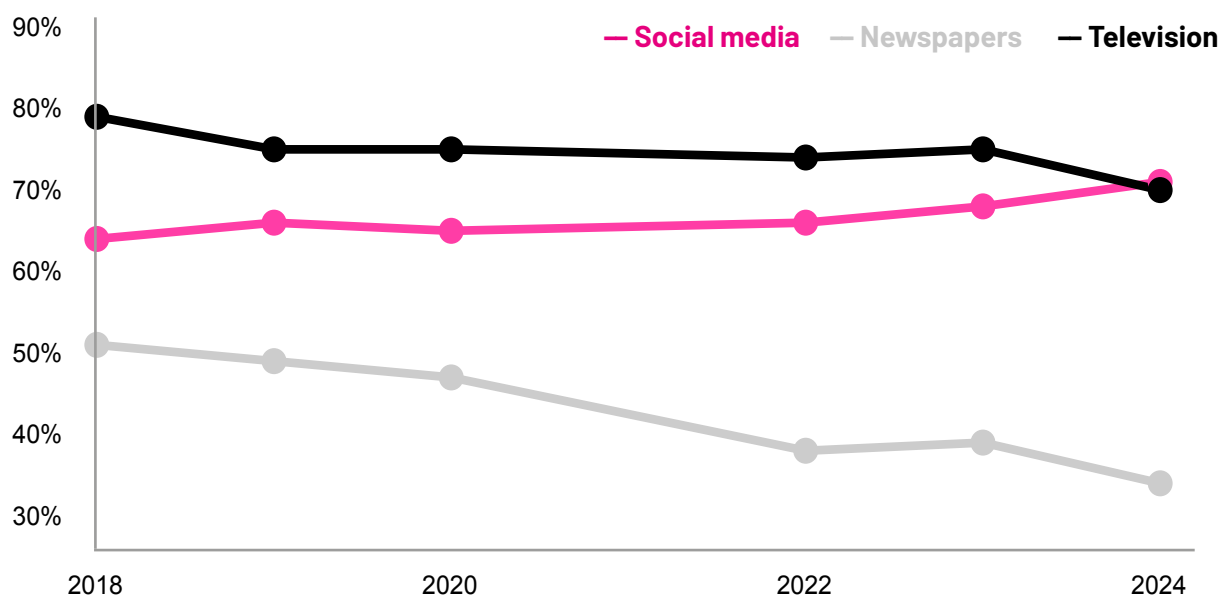
While disinformation often emerges in isolated pieces, it can also be propagated systematically by coordinated campaigns. Coordinated disinformation had a significant impact on the 2024 summer riots in the UK, where widespread false claims were used to incite real-world actions.

Online echo-chambers - closed groups centred on specific political or identity-based views - play a critical role in these dynamics. Within these spaces, conspiracies circulate, reinforcing beliefs within the group and leading to more extreme positions¹³⁸. This feedback loop fosters a polarised environment and "culture wars," where echo-chambers continually clash, stifling nuanced discussions and impeding democratic debate¹³⁹.

Coordinated disinformation campaigns often erode trust in political institutions, cultivating fears of "liberal elites" controlling society¹⁴⁰, sowing baseless concerns over voter fraud, and spreading malicious conspiracies about public figures¹⁴¹. Studies have shown that participation in echo-chambers can increase trust in government when one's preferred party is in power - and significantly decrease trust when it is not¹⁴². This phenomenon further destabilises public confidence in democratic institutions and the legitimacy of electoral processes.

Bots and astro-turfing

Astro-turfing describes orchestrated PR or advertising campaigns that imitate genuine public sentiment. Initially used by corporations as a marketing tactic, astro-turfing is now frequently deployed for political objectives¹⁴³. These artificial "grassroots" campaigns aim to convince the public that significant numbers of people are rallying around a particular issue, manipulating public opinion by creating the illusion of widespread, authentic support. By



▲ **Figure 14: Comparative reach of UK news sources** . Source: Ofcom / PressGazette

targeting audiences with data-driven messages, these campaigns aim to create the illusion of peer pressure in order to influence people.

These strategies are facilitated by the use of bots, automated social media accounts programmed to engage with content and amplify it. Bots are deployed in large numbers to push specific topics into trending status through repeated, identical posts and hashtags, often in coordination with disinformation campaigns¹⁴⁴.

The role of Artificial Intelligence (AI)

Advances in technology have consistently outpaced regulatory frameworks, with recent developments in large language models (LLMs)¹⁴⁵, including generative AI tools such as ChatGPT, introducing new challenges. Currently, half of Britons express concerns over AI's societal impact, while two-thirds report little to no confidence in technology companies to develop AI responsibly¹⁴⁶. These powerful AI tools are likely to exacerbate existing issues of online disinformation and its harmful effects on political discourse around elections.

Three significant risks posed by AI to democratic integrity include:

- Political 'deepfakes'**: AI-generated deepfakes,

which produce highly realistic but fabricated audio and video, are now a tool of disinformation. In early 2024, X (formerly Twitter) was flooded deepfake image circulated of Kamala Harris depicted as a communist dictator¹⁴⁷. In the UK, AI-altered generated content has falsely portrayed Labour leader Keir Starmer endorsing a dubious investment scheme¹⁴⁸ and bullying party staff¹⁴⁹. These manipulations can increasingly be used to misinform public perceptions in an attempt to influence elections.

- Enhanced astroturfing**: AI exponentially scales the reach of astroturfing campaigns, allowing bots to create convincing, human-like messages and propagate disinformation more widely than ever. Canadian researchers have observed that authentic human tweets increasingly mimic the language of bots, showcasing the heightened influence of AI-driven messaging¹⁵⁰.

- Inadequate content moderation**: AI is now deployed as a content-moderation tool on social media, but with limited success¹⁵¹. According to Ofcom, AI moderation fails due to three main issues: a lack of nuance leading to false positives and misidentified content, difficulty recognising manipulated content, and cultural variances in defining "toxic" or "harmful" content¹⁵².

The proliferation of LLMs in political communication underscores the urgency for updated digital regulation. Researchers from the Centre for Emerging Technology and Security report that “domestic and state actors, including Russian interference, all played a role in disseminating AI-enabled disinformation” during the UK’s 2024 General Election. Their study found that this AI-driven disinformation misled voters on electoral issues, eroded public trust in the online information environment, and resulted in harm to the well-being and professional standing of political figures targeted by deep-fakes¹⁵³.

Data-driven campaigning

A 2021 report by Fair Vote¹⁵⁴ called for restrictions and regulations on how political campaigns use personal data to target users with advertisements. It argued that voters have a right to know who is collecting, distributing, or selling their data - and how campaigns leverage this data for personalised messaging. Transparent practices around this “invisible processing” would help individuals better grasp the source, context and intent of messages aimed at manipulating their thoughts and behaviours.

Since then, the European Union’s Digital Services Act has established restrictions preventing the targeting of individuals based on protected characteristics, setting a precedent for transparency and protection in data usage. However, the absence of similar measures in the UK means that British citizens do not currently benefit from the same level of transparency and safeguards against invasive data-driven tactics.

Data-driven campaigning allows political parties to tailor their messages differently for individual voters. Former Full Fact director Will Moy describes how, upon visiting a website, “an auction happens immediately” where parties use a combination of personal data, browsing history, and third-party data to dynamically create and display a customised message. This practice, known as “dynamic content optimisation,” lets campaigns tell each voter what they believe

that individual wants to hear, reinforcing the impression that politicians are inconsistent and undermining public trust in political discourse.

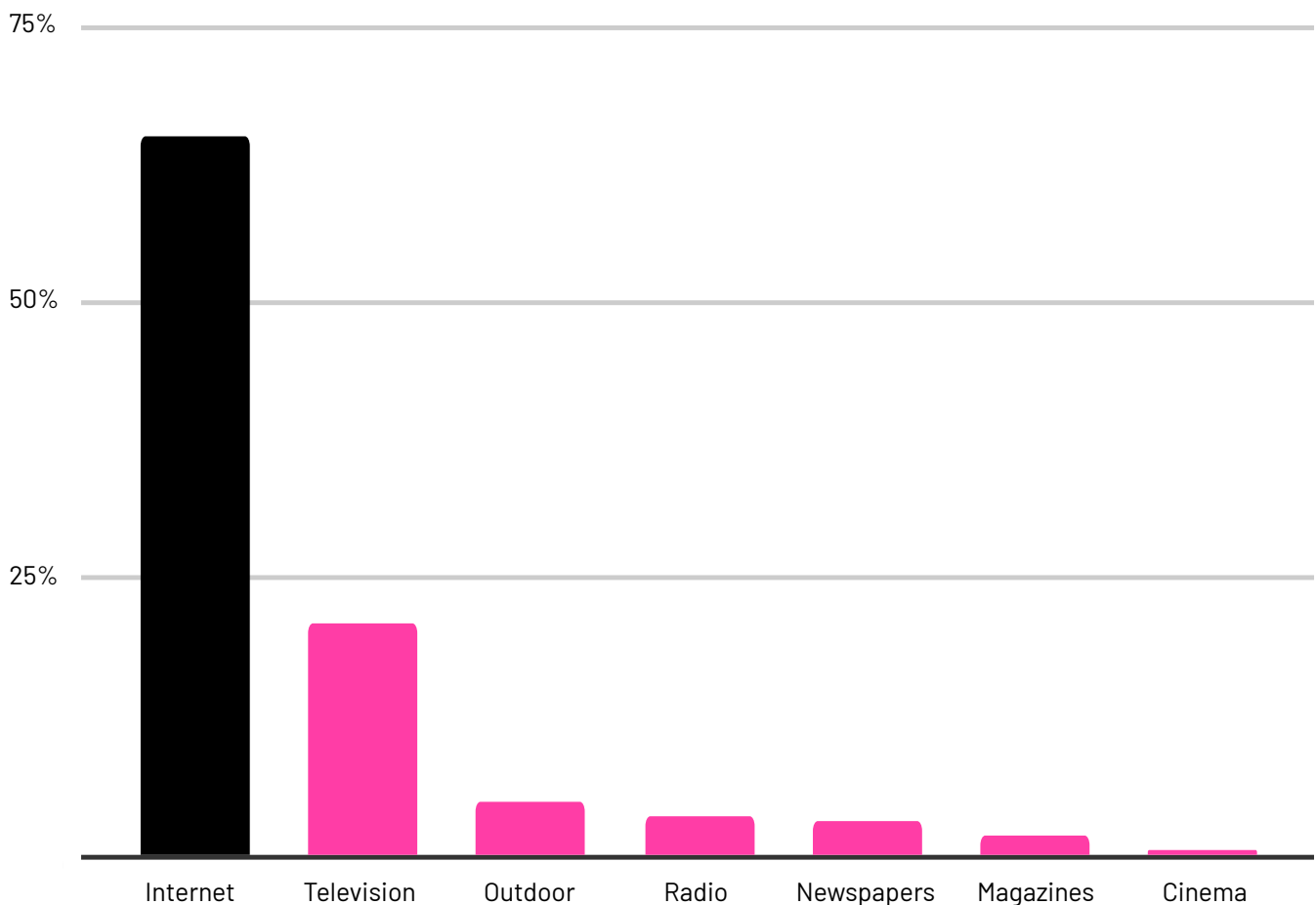
d. Social media’s business model

Disinformation on new and social media is not solely driven by malicious actors; it is also a byproduct of the platforms’ fundamental business model. Platforms like Google, YouTube, and Facebook derive the majority of their revenue from surveillance advertising, a model that monetises data by tailoring advertisements based on users’ behaviours and preferences¹⁵⁵. This model incentivises engagement above all, meaning that the more users interact with content - accurate or otherwise - the more profit the platform generates.

Divisive and false content increases engagement

One of the fundamental issues with online platforms is that false, divisive, and harmful content generally spreads much faster than factual information¹⁵⁶. An MIT study on X found that tweets containing false information were 70% more likely to be retweeted, especially in the political sphere, where “false news online travels farther, faster, deeper, and more broadly than the truth”¹⁵⁷. These dynamics are often manipulated by users and groups that understand how to “super-spread” disinformation, exploiting platform algorithms that prioritise engagement over accuracy. In many cases, online users and groups are able to game these mechanisms to “super-spread” disinformation, aided and abetted by the platform’s algorithms¹⁵⁸.

A study by the University of Cambridge¹⁵⁹, which examined nearly 3 million tweets and Facebook posts, found that posts criticising or mocking those on the opposing side of an ideological divide - referred to as the “political outgroup” - are shared at twice the rate of positive posts about one’s own side.



▲ **Figure 15: Where companies pay to advertise.**

Source: 'Distribution of advertising spending worldwide', Statista

This tendency for negative, polarising posts to go viral¹⁶⁰ poses a significant challenge for democratic debate, as it promotes division over constructive dialogue. The United Nations has raised concerns that the "growing weaponization of social media to spread hateful and divisive narratives has been aided by online corporations' algorithms". A key obstacle in addressing this problem, according to the UN, is the lack of transparency from online companies.

Top-down influence by platform owners

Most digital platforms amplify content based on what drives the most engagement and, ultimately, profit. However, in some cases,

the personal beliefs of platform owners can significantly influence the "town square" that millions rely on for information.

Elon Musk, for example, has been accused of turning X into a "megaphone" for his personal right-wing politics¹⁶¹. In 2023, Media Matters, a US-based non-profit, reported that X was attaching advertisements to anti-Semitic and extremist content¹⁶². In July of that year, the EU Commission criticised Musk for making the platform a hub for disinformation and illegal content, and for blocking external researchers from studying the spread of harmful content¹⁶³. Notably, openly pro-Nazi accounts have been verified on X¹⁶⁴, and research indicates that

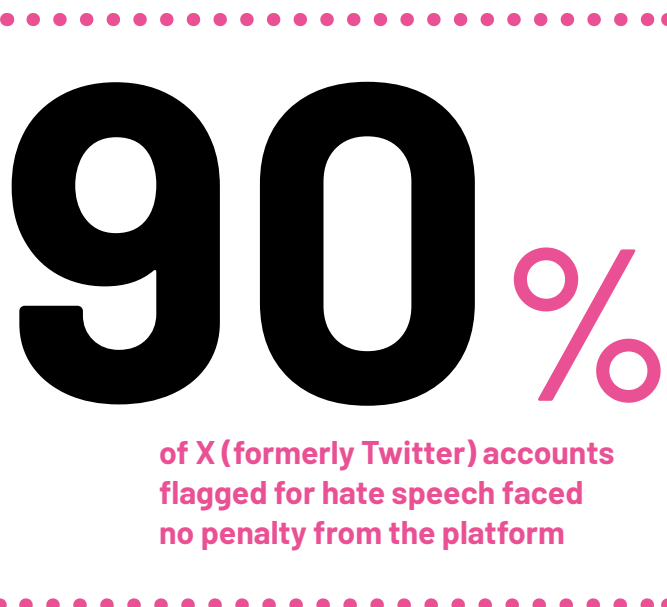
86% of reported hate speech posts and 90% of accounts flagged for hate speech faced no penalties¹⁶⁵.

Despite Musk's public support for free speech, he has taken legal action against those who affected his advertising revenue, including alleged algorithmic restrictions on progressive accounts and Democratic Party officials in the lead-up to the 2024 US Presidential Election¹⁶⁶. Public interest journalists, including some who criticised Musk personally, have been suspended or banned¹⁶⁷. According to Media Matters, this rise in right-wing extremism on X may not be solely about free speech but reflects Musk's alignment with certain ideologies¹⁶⁸.

The algorithmic black box and a lack of transparency

One of the major challenges in mitigating the harm caused by disinformation is the lack of transparency surrounding new and social media algorithms. These algorithms are largely a mystery to everyone but the engineers at companies like Meta and X, leaving users and regulators in the dark about how content is curated and amplified. One legal expert noted, "In the algorithmic society, a legal right to know about the workings of social media algorithms is of utmost importance, yet no such right exists. Instead, algorithms are developed, applied, and even legally protected as black boxes"¹⁶⁹.

The non-profit organisation Ranking Digital Rights, which evaluates tech platforms on human rights accountability, has found that "algorithms are accountable to no one - not even the companies that build and deploy them"¹⁷⁰. In 2022, their assessment showed that not a single new media platform achieved a passing grade on transparency and accountability¹⁷¹.



90%

of X (formerly Twitter) accounts flagged for hate speech faced no penalty from the platform

RECOMMENDATION 3

Transparent responses to 'legal but harmful' content

The APPG for Fair Elections calls on the government to amend the Online Safety Act to require new and social media platforms to publish risk assessments for 'legal but harmful' content, in the same way that they are currently obliged to do so for illegal content.

We all have the right to free speech, but no one has the right to expect the unlimited amplification of content they produce that is likely to harm others or spread disinformation.

In keeping with the approach new media companies are required to take towards illegal content, platforms should be obliged to outline the steps they will take to mitigate risks arising from such legal but harmful content. This includes identifying the categories of this content that may arise, assessing the likelihood of it appearing, and detailing the strategies they intend to deploy to remove it.

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The recommendations:

- 1. Establish a National Commission for Electoral Reform to recommend a fair and democratic replacement for First Past the Post.**
- 2. Close donation loopholes, so the public knows who donates, how much and to whom, while strengthening the Electoral Commission to enforce the rules.**
- 3. Require social media companies to be transparent about how they handle 'legal but harmful' content, including disinformation.**



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