

Evidence Submission: Inquiry into the Impact of Social Media on Elections and Electoral Administration

Sofia Collignon and Ben O'Loughlin

[REDACTED]
New Political Communication Unit, Royal Holloway University of London

31 August 2020

The New Political Communication Unit is a leading research centre within the University of London specialising in research, policy advice, and graduate teaching in political communication. It was established in 2008 and has carried out funded research on social media and elections since 2009. We have advised the EU and EU member states, the US, NATO, and many public and private sector organisations on social media and politics. Thank you for the invitation to contribute to your inquiry.

What problems have you seen with social media and online advertising around elections?

1. Regulation is two steps behind the advertising industry and how technology works. Regulative bodies and institutions have been a in continual cultural lag. Electoral commissions have not been aware of how technology worked or why behaviour in the ad industry is affecting politics and must be regulated if election standards are to be upheld.
2. There is a lack of understanding about what drives attraction to online advertising in politics. When social media was in its early stages in 2011, one digital analytics consultant told us about claims about online advertising's influence, 'it's snake oil, to be honest'.¹ It was lucrative but not understood. Clicks could be measured, but not what caused individuals to click. There are two main reasons for this. First, individuals are not isolated units who respond directly to communication from an ad. Individuals are social, they click and share ads they think are relevant for their family or community, and so the effects of ads cannot be understood until the social dynamics of online politics are researched. The Gallup-led agenda since the 1930s of public opinion as the aggregate of individual decisions has limited value; public opinion is also moved socially² and lab experiments exposing individuals to ads miss how people consume media socially. Second, those working in social media do not have a causal explanation of why any ad goes viral or fades away. They must refine the "inputs" of an ad (quality, cast, narrative) to maximise the "output" (clicks, comments, shares) but they themselves say they do not know why a certain mix of inputs produces a certain type of output.³ There is concern about large-scale social behaviours being caused by social media and online advertising but little systematic scientific evidence to show it even works.

¹ Unpublished correspondence.

² Anstead, N., & O'Loughlin, B. (2015). Social media analysis and public opinion: The 2010 UK general election. *Journal of Computer-Mediated Communication*, 20(2), 204-220.

³ Miller, C. (2018). God is in the machine. *Times Literary Supplement*, 21 August. Available at: <https://www.the-tls.co.uk/articles/ridiculously-complicated-algorithms/>

3. Lack of knowledge about what drives clicks should bring public recognition that exposure to an ad is not persuasion by that ad. Just because an individual or group click on an ad does not mean they are persuaded by it. They may be mocking it, showing its limitations, creating awareness that the opposition is spending on advertising, and so on. This indicates that the effect and shareability of an ad is context-related and how an individual understands the ad depends on the social dynamics and norms an individual is embedded within.⁴ Likewise, an explosion of clicks does not mean an explosion of persuasion. The political effects of online advertising must be researched in detail on different campaigns, different contexts, and with different groups targeted.
4. Lack of transparent data from social media firms makes it impossible to research how users engage with political ads online on some platforms. No access to Facebook data has made it impossible for researchers to measure the effects of individual ads or the longitudinal effect of exposure to repeated ads. There is evidence suggesting that WhatsApp plays a key role in distributing and sharing campaign information as informal networks meet and engage in politics there⁵ but its closed, encrypted groups are impossible to follow. This means that, at the moment, it is impossible to see how an ad campaign functions across platforms.
5. The rise in the use of social media by politicians, campaign managers, supporters and general public alike has blurred the definition of what *is* a political ad, as supporters of parties can produce and distribute ads themselves without party permission. This could allow an enriched participatory democracy if all ad producers followed a civic framework of respectful disagreement and they made efforts to ground claims in evidence. However, at the moment, given the evidence that negative campaigns are successful in engaging citizens⁶ and in the absence of a clear mechanism of accountability, we observe a rise in negative advertisement and misinformation on social media. This behaviour is currently diffused, it can cross borders, and requires research.
6. Anti-democratic campaigns are easy and relatively unpoliced. Democracy requires candidates and parties to be credible even to their opposition in order for informed debate across party lines. This is the only route to an inclusive national conversation about shared problems.⁷ Candidates and elected officers mentioned in surveys and interviews that social media has been used as a tool to organise smear campaigns^{8,9}. Negative ads sometimes spark hate amongst some communities and, in other cases, it can be used to isolate candidates from their own support networks. There is a fine line between misinformation and negative advertisement and this line is often crossed, causing stress, anger and fear among politicians. In the case of elected officials, it is

⁴ Denisova, A. (2019). *Internet Memes and Society: Social, Cultural, and Political Contexts*. Routledge.

⁵ Kligler-Velenchik, N. (2016). "Imagine we're all in the living room talking about politics": Israeli WhatsApp groups devoted to informal political talk, *Selected Papers of AOIR2016: The 17th Annual Conference of the Association of Internet Researchers*. Berlin, Germany, 5-8 October 2016.

⁶ Van Heerde, J. (2007). Political communication: party advertising in the general election. In *Political Communications* (pp. 65-78). Palgrave Macmillan, London.

⁷ This is a cannon in political science. See the work from the 1920s-2010s of Dewey, Lippmann, Arendt, and Habermas.

⁸ Collignon, S., & Rüdiger, W. (2020). Harassment and intimidation of parliamentary candidates in the United Kingdom. *The Political Quarterly*.

⁹ Dhrodia, A. (2018). Unsocial media: A toxic place for women. *IPPR Progressive Review*, 24(4), 380-387.

used to motivate disciplinary actions to separate them from key decision-making positions. It does not matter that the political ad uses fake news. Once the damage is done it is difficult to undo it. This is partly because the victim does not have the forum to defend themselves or because the public will not believe them.

7. Anti-democratic campaigns can poison the well of democracy through new ads that constitute a form of character assassination. A campaign often uses coordinated efforts on social media. Such efforts aim to spread the message, but they also aim to discredit the opponent. It is not clear when misinformation becomes intimidation, but it is clear that campaigners can incite hate and that this has strong emotional consequences. One interesting example that came out in the interviews conducted is a political candidate who had his account hacked to post racist messages on social media. The candidate reported it to the police but there were not enough resources to prosecute or investigate the hacking of a Twitter account. However, the messages posted by the hacker received considerable attention in the press and resulted in the politician's removal from the party and his exclusion from participating in key committees. He was also labelled racist in his community. Later on, the party devoted some funds to investigate the hacking and the politician was cleared. However, the news media was not interested in covering the second part of the story and, therefore, the politician's name is still associated with racist posts in the public's mind. We call this *character assassination with impunity*. It must be stopped.
8. Political ads paid for by a political party can be adopted, altered, or recontextualised by users and groups without the political party's knowledge. Those users or groups may be in another country or anonymised within the country. The ad can be used to reinforce a barrier between communities and promote hostility towards another group. This hostility can be felt by individuals too. Thus, a political party's ad can be used with relative impunity for anti-democratic purposes. The party may be implicated in acts of hate they are not aware they are directly or indirectly responsible for.¹⁰
9. People can put ads in different contexts in order to justify or criticise them. Tactical use of context can be an important skill to avoid regulation as electoral activity. All these ads can legitimately be put in different contexts. For example, a political party or a citizen in Victoria may wish to limit Chinese student numbers at Melbourne universities. They pay to run attack ads about Chinese human rights abuses or aggression in the South China Sea and build negative sentiment without mentioning Melbourne universities. So this party or person will appear to be concerned with a geopolitical context, but is quietly making a point indirectly regards policy in Victoria. Is this participating in an election? Those with knowledge of the political context are required to decide this and police this.
10. Journalists and policymakers must not panic about filter bubbles. Existing debate is hindered by a lack of accuracy. Quite simply, there are different kinds of bubbles. Danish scholars found news and policy reports vary between notions of a filter bubble defined by the news sources people share, by the arguments expressed, by party political affiliation, or be a community identity that happens to have found an election

¹⁰ This conclusion is reached from interviews with more than 15 politicians in the UK, sponsored by British Academy /Leverhulme grant SRG19\191702

important.¹¹ Given that much political communication research shows that users are exposed to an ideologically varied range of content and that users regularly click on stories they disagree with,¹² the notion that a closed, hate-spouting bubble has formed is possible but unlikely to apply to a population. It must be treated responsibly through accurate, evidence-based reporting, not speculation.

11. Journalists must not amplify the sensationalism of ads either from major political parties or from unknown affiliates. It is possible to contain their emotional effect and false claims by reporting their existence and infringements without actually showing them. Editors must encourage a news culture that prioritises responsibility to democracy over short-term click rates.

What actions have you seen governments take in relation to social media/online advertising and elections?

In the context of online harassment, bullying and intimidation, negative advertisement or online smear campaigns are difficult to typify as they are often not one single action but a series of events that are linked. It is the accumulation of isolated actions that constitutes the abuse. Many times, politicians wait until the aggression accumulates before reporting it to the police, but once they do so, they find that there are few things that can be done to protect politicians. There are two main reasons for this. First is the lack of resources that police devote to prosecute this type of behaviour. The second is that the anonymity of social media gives perpetrators a shield.

In the UK, an effective policy action has been to create a cross-party code of conduct to foster a kinder and safer political environment. The Jo Cox foundation promoted it. It is a positive initiative but we believe of limited practical scope. The UKRI (UK Research and Innovation programme) initiative “Protecting Citizens Online” devotes resources to conduct research on this topic as well. The Parliament Committee of Standards on Public Life launched in 2017 an inquiry on the topic of intimidation in public life. As a result, The National Police Chief’s Council tailored some training courses to enable the UK police to effectively investigate offences committed through social media. Twitter responded with a detailed account of rules to protect users, including enhanced safety policies, better tools and resources for detecting and stopping malicious activity.

Governments need to take national action and international coordinated action to force social media companies to comply with regulation on political advertising or face prosecution. Fines will not deter social media companies. Since this is a common problem in any democracy as parties are seeking to win votes, all democracies should in principle agree common standards and police them. However, some democracies contain state or non-state actors who seek to influence political debate in other democracies so international cooperation will be difficult.

¹¹ Bechmann, A., & Nielbo, K. L. (2018). Are We Exposed to the Same “News” in the News Feed? An empirical analysis of filter bubbles as information similarity for Danish Facebook users. *Digital journalism*, 6(8), 990-1002.

¹² Nechushtai, E., & Lewis, S. C. (2019). What kind of news gatekeepers do we want machines to be? Filter bubbles, fragmentation, and the normative dimensions of algorithmic recommendations. *Computers in Human Behavior*, 90, 298-307.

In the EU, the European Action Plan uses “soft law” solutions. In one instance, all platforms made an Ad Transparency Archive to create transparency about which ads have been exposed on the platforms, who is the source, how many of each ad was posted, and who on a very general level (age, region) has been exposed to the ad in question. However, the Ad Transparency Libraries follow different data formats – some with application programming interfaces (APIs) and some without. They are not designed to allow large-scale comprehensive analysis, or data science, and they do not allow researchers and journalists to data mine the text and pictures of the ads in order to understand the potential variation in microtargeting strategies towards specific users.¹³ Citizens can browse these archives to get a first impression of what parties or advertisers are trying, but systematic scientific knowledge cannot be formed.

What results have been achieved by these actions?

There has been a rise in complaints and numerous reports in news media. The main effect so far has been to create awareness of the problem. However, there are still a lot of challenges.

Electoral authorities often lack technology literacy or the capacity to enforce regulations. To be effective they need a leap forward on both problems. Above all, they must be proactive not reactive. To be reactive is always to be lagging behind technology and action.

Tougher and more technology literate authorities would need to be explained to the public, but such authorities are in the public interest as they are required for democracy to function in a digital era.

For instance, the EU’s soft law and ad archives could be used to raise awareness among political journalists, who then raise awareness among publics, about what political ads are being carried on different platforms. This would have news value because it could show who which parties were working with which advertisers to produce what ads, how social media platforms distributed those ads to which users, and who was flouting law or norms. This could allow a modest amount of relevance, and even drama, about who was acting within electoral rules. If those breaking the rules were policed and prosecuted, this would demonstrate to public audiences the stakes involved in this news and these advertising practices.

What are the most effective ways to address any problems with social media and online advertising around elections?

Make it clear and obvious who is paying for the political ad.

Forbid ads that do not present information that has been corroborated.

Do not panic about filter bubbles until there is evidence that these bubbles cause uncivil and illegal behaviour.

¹³ Bechmann & O’Loughlin, *ibid.* Moeller, L. A., & Bechmann, A. (2019). *Research Data Exchange Solution*. Report for the EU Commission. Brussels: SOMA.

Journalists must report who is abiding by the law and who is breaking it, but not promote attention of audiences to the very ads of those breaking it. Sensationalism risks lives and harms democracy.

Build knowledge about how advertising is evolving on social media. How were Facebook and YouTube used in specific elections in 2008, 2012, 2016, 2020? To fixate only what is posted on them in 2020 or 2021 is to reject any understanding of how political advertising is developing and responding to different contexts. Also, be aware that the development of politics ads will not be linear with focused periods for elections. There will be campaign pushes at different times, around different issues and personalities, driven in part by journalists if there is a controversial and sensational angle. To build knowledge about how advertising is evolving on social media means getting beyond simple headlines. It means synthesising research in numerous sectors, disciplines, and countries. This is an opportunity for any commissioner or leader who can see this horizon and hire experts capable of scanning that broad horizon of ads in elections.

Build knowledge about how parties or other political actors use political ads across many media, older and newer. Campaigns are coordinated and gain momentum by building a charge of excitement on one medium that transfers to coverage and attention in other media. To fix on “the digital age” is to entirely miss this.¹⁴ A “regulate Twitter” solution will not work because it will not regulate all the other media that those Twitter ads will gain coverage in. Multi-layered regulation or defence of democracy is needed.

Electoral regulators must undertake or commission research that explains the *integrative* function of social media platforms. Political ads on social media can link a user directly to a party or any organisation the producer wants to advertise. When political parties did this in the Twentieth Century through TV and radio ads or local leaflet and meeting campaigns, this was sufficiently regular and predictable for regulation to be applied. Since political parties and the ad companies they work with are constantly experimenting with new ways to connect a party to a citizen or a group through an ad in the Twenty First Century, electoral regulators must be ahead of the curve in order to impose meaningful regulation. Electoral regulators must work with social media companies, political parties, and expert researchers to understand how integration is happening. Since this is where trust, loyalty, mobilisation and participation can be generated, it is essential to understand and manage this so integration is not used for anti-democratic or uncivic purposes.

Digital media mean this integrative research can be both qualitative and quantitative.¹⁵ Through quantitative analysis of big datasets, including datasets that are repeated and longitudinal, it can highlight statistical patterns that condition responses to ads, and identify the factors that make those patterns likely. Through qualitative analysis it can build an understanding of the close language used by groups in particular contexts when discussing an ad, how contestation emerges and plays out, and detailed or “thick descriptions” of how particular users become leaders or successful disseminators within certain communities.

¹⁴ Karpf, D. (2020). Two provocations for the study of digital politics in time. *Journal of Information Technology & Politics*, 17(2), 87-96.

¹⁵ Anstead, N., & O’Loughlin, B. (2014). New Directions in Web Analysis: Can Semantic Polling Dissolve the Myth of Two Traditions of Public Opinion Research?. In M. Cantijoch, R. Gibson, & S. Ward (eds.) *Analyzing social media data and Web networks*. Palgrave Macmillan, London, 256-275.

There must also be continued open challenge to the business model of social media platforms. In the current business model, platforms are encouraged to promote sensational, outrageous and shocking ads because those ads are most likely to create attention and clicks. This business model leads them in the design of algorithms, in the interface design and in the default settings to support this tendency in order to retain user time on the specific platform that then can be commodified in advertising revenue. This matters for democracy because these algorithmic choices, interface designs, and default settings are an industry right but may conflict with democratic ideals and values.¹⁶

In short, governments should commit to building a data literate political culture. Users must see which advertisers are targeting them, how their data is being analysed and by whom, and legislation should ensure aggregated data is not used in discriminatory ways (for instance on health insurance or criminal profiling). This would produce a more open and data-literate culture.¹⁷

Final points

Enforced regulation of political advertising on social media is essential for democracy to function. Democracy requires stable, trusted sources of information for the public to exercise their voting rights as informed citizens. It also requires a culture of trusted information for citizens to understand but respectfully disagree with other citizens and feel they are part of a national political community.

Curiously, a focus on political ads may be far more useful than a focus on a single social media space. From past journalist labels like “YouTube election” and “Twitter election”, to the current labelling that Belarus is a “Telegram election”, such simplifications completely miss how communication works across platforms *and* across newer and older media *together*. Systematic attention to how political ads work across platforms and over time may be a first step towards meeting the challenge of understanding how ads have effects in media ecologies that are evolving and integrating in new ways.

There has been zero effort by electoral administrators to be ahead of the game in democracies in which social media and political advertising have moved quickly. They do not enquire what technology will be widespread in years to come and plan how it should be regulated. They often struggle to understand what technology is already widespread. They may think “digital” is something different to existing media systems and not understand that old media are renewed by digital while digital often seek access to coverage in old media – it is one system. Since digital *feels* new to many authorities and voters this actually opens a chance to *lead* its regulation.

As a result, electoral administrators are reactive and may seek digital-only fixes. This means they have allowed entrenchment of ‘radicalised’ media networks in many countries and *then*

¹⁶ Bechmann, A., & O’Loughlin, B. (2020). *Democracy & Disinformation: A Turn in the Debate*. Royal Flemish Academy of Belgium for Science and the Arts. Available at:

<https://www.kvab.be/sites/default/rest/blobs/2557/Final%20Report%20Dem%20&%20Desinfo.pdf>

¹⁷ Bechmann & O’Loughlin, *ibid*. See also HLEG (2018). A multi-dimensional approach to disinformation. Report of the High level Group on fake news and online disinformation. European Commission. Available at: <https://ec.europa.eu/digital-single-market/en/news/final-report-high-level-expert-group-fake-news-and-online-disinformation>

suggested that perhaps some regulation is needed.¹⁸ The consequence of this failure to regulate is continued disruption of shared standards of truth and veracity among a public. The consequence of that disruption of shared standards is that antagonisms deepen and are harder to resolve because of different beliefs about how the world is and how we know that.

Leadership on regulation and policing of political advertising on social media would allow electoral authorities a chance not only to adapt existing rules but to draft new rules that fit new technologies. Those new rules can build on older ones as those older ones had value during the stable media-political system of the previous century. This is an opportunity – an opportunity to work for a more effective democracy and to work in the public interest.

Instead of feeling AI, bots, deep fakes and so forth are frightening sci-fi technologies that will cause disruption by dangerous political actors, electoral regulators must be willing to explore and explain how the use of these technologies affect elections from the first moment these technologies are used in public. All have been around for years, have been researched in commerce and universities, and their initial uses in political have been observed. They show continuities and changes. They must be regulated now, not in ten years.

¹⁸ Benkler, Y., Faris, R., & Roberts, H. (2018). *Network propaganda: Manipulation, disinformation, and radicalization in American politics*. New York: Oxford University Press.