

Liberal Democrats – written evidence (DAD0094)

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1. How much of your online campaign strategy relies on the organic spread of your content and how much relies on paid promotion? To what extent do you rely on campaigning material created by activists over which you have no control? What reputational and other risks does this pose?

During a campaign we seek to maximise the ability of both organic and paid activity on social media to communicate our positions and policies. For the purposes of campaigning, the potential reach of paid activity is greater than organic activity. We can measure our KPIs and overall performance more closely. Organic sharing is by its nature much more limited in terms of targeting and more difficult to optimise due to its nature.

The core objectives of our digital campaigning do not currently rely on campaigning material created by activists. While organic, grassroots content is very helpful and welcome, even with guidance it has proven inconsistent in quality and often inconsistent with our messaging.

2. How important is data from companies that monitor the public's online activity (either from social media companies or from data brokers) to your data operation? Has this changed significantly in recent years?

We do not use data brokers or social listening platforms. The use-case of information produced by social listening platforms is very limited. The organic social media space can provide interesting insights, but realistically the information garnered from such companies is imprecise and cannot be easily used in our online campaigning activities.

3. How much do you rely on the current GDPR exception for the use of data for political engagement for your use of individual's data? What would be the effect of revisiting this exception in light of increased public concern?

We do not use the GDPR exception of special category data regarding political outlook with our digital advertising or organic activity. Our understanding of the GDPR guidelines led us to only use personal data where we have consent opted in. The GDPR exception for political outlook does not fall under this category, so we do not match data on political outlook in Connect with our advertising activities on social platforms.

4. What would be the effect of Facebook limiting data targeting to postcode, age and gender, in a similar manner to Google, on your social media strategy?

It is impossible to say right now what the overall impact would be without knowing what other regulatory changes or Facebook platform changes would also take place at that time. Facebook's algorithm would have a large impact on how we would change our strategy in that kind of context. Hypothetically, such a shift would likely lead to a reprioritisation of our digital strategy on social media, but it's difficult to detail specific changes we would make without more information as well as basic testing.

5. What changes do you expect to happen in online campaigning in the next five years? How will you ensure that your Party maintains public trust in adapting to new technological opportunities?

The biggest questions we have about the future of online campaigning are related to regulatory changes, such as new interpretations of GDPR and appropriate guidance from that as well as restrictions on social media or digital platforms in terms of sharing or promoting political content. The organic creation and rise of new platforms, such as TikTok, also introduces questions that we must take into account. Lastly, our members and the public's usage of different digital platforms will determine the most appropriate and convenient way to communicate with people. Media usage continues to shift, and we aim to be as helpful and efficient in providing our members and the public with clarity on our positions and policies.

Our party has a very strong commitment to transparency, individuals' civil rights, and responsible data usage, and so we ensure that our internal strategy and policies adhere to those values in addition to taking ICO and other regulatory guidance very seriously.

6. Should political advertising (both digital and traditional) fall under the same constraints as do all other forms of advertising?

Due to the broader civic and social impacts of political advertising, and the role it plays with the public understanding of national issues, it is fair and reasonable that the facts and views expressed by political ads have greater transparency.

It is also fair to demand greater transparency on financing of political ads.

7. If just one thing could be done to improve public trust in election campaigns (by parties, platforms or anyone else) what would it be?

One potential way to improve trust in democratic digital activity would involve penalising disinformation or fake news claims promoted via social media ads by introducing temporary bans on users who violate their guidelines.