14. Brexit: Public Relations Campaign with Integrated Social Media Changed Political World

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Abstract: Both the 2016 US election of President Trump and the outcome of the 2016 United Kingdom European Union Membership Referendum, in favour of the Vote Leave campaign, are frequently given as examples to illustrate the power of micro-targeting in PR campaigns. Harvesting data to profile audiences has made it possible to identify people who are likely to be especially receptive to particular ways of framing issues. It is allowing political campaigns with sufficient funding to buy access to many discrete audiences through Social Media, and it is making it possible to develop psychological profiles to send tailored messages, designed as powerful triggers, to people who are judged to be potentially receptive targets for influence. Is this clever marketing, or is it buying democratic outcomes?

 '*Take back control*', how had such a vague message been so influential in the 2016 United Kingdom European Union Membership Referendum? The Referendum result surprised many people, including professional pollsters and the sitting Prime Minster who called the Referendum, David Cameron. After nearly half a century of membership and close cooperation with the EU, a narrow majority in the UK had voted to leave the EU (51.89 : 48.11 %).

The UK public are used to the UK's Advertising Standards Authority regulating commercial campaigns so messages conform to the principles of being Legal, Decent, Honest and Truthful. However, for political campaigns and referenda, few members of the public in the UK are aware that unregulated and contentious campaign messages can be promoted across the media landscape free of regulation.

Does this signal the direction of future political campaigning, will well-funded Public Relation campaigns use insights into specific psychological traits within micro segments of the population to deliver tailored trigger-messages via Social Media? The potential for such campaign activity to influence the character of public debate is an important concern for those who are interested in the mechanism that support open debate and the personal choice that lie at the heart of democratic principles.

Keywords: Brexit, Vote Leave, micro targeting, public relations, social media, political marketing

Case study: The UK Brexit campaign

Introduction

This chapter looks at a successful political campaign run by *Vote Leave* to help win the United Kingdom's (UK) 2016 referendum to leave the European Union (EU). In April, 2016, the Electoral Commission, the body that regulates elections in the UK, allocated the official representation in the Referendum for official ten week campaign period. Using the slogan, '*Let's Take Back Control*', **Vote Leave** represented the *leave* option; **Britain Stronger in Europe** represented *remain*, under the slogan '*Stronger, Safer and Better Off*'.

Holding a Referendum was a Conservative Party 2015 General Election manifesto pledge by the Prime Minster (PM), David Cameron, to appeal to Eurosceptic voters and appease Eurosceptics in his Party. On winning the Election, Cameron launched a Referendum and the prospect for change: a 'leave' outcome might risk significant economic and cultural

disruption by harming institutional ties and inhibiting free trade; however, a 'remain' outcome might silence Eurosceptics.

The Referendum provided an opportunity for both camps, *Vote Leave* and *Britain Stronger in Europe* (hereafter called *Remain)*. *Remain* sought to keep the status quo (to retain membership inside the EU); *Vote Leave* sought to disrupt the status quo (but without clear indications of what leaving the EU involved). With an accepted *risk aversion* bias in psychology (Kahneman, 2012), it could be reasoned that a 'leave' outcome was unlikely. Therefore, at the start of the campaign, *Remain* might have expected to win comfortably, an outcome widely supported by bookmaker odds (Cummings, 2016). The challenge for *Vote Leave* was to bypass unclear implications about leaving and present leaving in a positive light, or as an escape from a flawed future within the EU.

This chapter looks at *Vote Leave* campaign activity and how Electoral Commission regulation protected democratic processes. If public support for leaving the EU involves trusting the Referendum result, Electoral Commission oversight needed to ensure neither campaign eluded Electoral Commission regulation for potentially unfair advantage.

The 2016 'Brexit' Referendum

In 2016, on the 23rd of June, the UK public were offered a choice:

> *"Should the United Kingdom remain a member of the European Union or leave the European Union?* ' (See Further reading: Electoral Commission, 2015, n.p.)

By a narrow margin (51.89%, leave: 48.11%, remain – on a 72.2% turnout), 37% of the UK electorate (17.4 million people) voted to leave the European Union (EU). It was described as

a '*non-binding referendum'*: a leave outcome carried no legal obligation to leave the EU. However, Cameron promised government would honour the result and act accordingly. A Remain advocate, Cameron stepped down as PM to be replaced by Theresa May.

Concern over the Referendum being a fair assessment of public opinion over EU membership followed, even expressed by a lead architect of the *Vote Leave* campaign, Dominic Cummings, who publically conceded it was possibly a mistake (Kuenssberg, 2021 - See Further Reading). Repeated opinion polls since 2016 have agreed, e.g. a YouGov poll (2021- See Further reading) suggested that if the referendum had been held in January 2021 the result would be: 49% remain, 37% leave and 13% no vote. Accusations of illegal practice by *Vote Leave* were confirmed by an Electoral Commission enquiry, and a fine was issued for overspending (See Further reading: Electoral Commission, 2016). However, Theresa May, refused to act over this irregularity on the basis that the result was 'only advisory'; this advisory status also thwarted other legal attempts to have the result set-aside (Cadwalladr, 2017a). At 11 PM (GMT) on 31 January 2020, the UK formally ceased being a member of the European Union.

UK Public Confidence in Politics

The UK's regulatory framework for the Brexit Referendum was managed by the Electoral Commission to ensure public confidence in elections, democracy and referenda. In 2021, reported polling data from *YouGov* shows UK public confidence in elected leaders has '*fallen to an all-time low after Brexit*' (Helm, 2021, n.p.- See Further reading) suggesting lost confidence in democratic processes.

Concern over the need to regulate instruments of powerful persuasion are not new. Warnings about the potential influence of rhetoric to deceive people can be traced back to Plato; in the Gorgias (Jowett 1871, translation - See Further reading). The UK offers protection against deceptive marketing communication (See Further reading- ASA, 2021a) under a Code developed by the Committee of Advertising Practice (CAP) and operated by the Advertising Standards Authority (ASA). The ASA seek to ensure promotional marketing campaigns are *legal, decent honest and truthful*. However, under Section 7 of the CAP Code, regulation does not apply to political advertisements (See Further reading- ASA, n.d.).

Political regulation is managed separately by the Electoral Commission: an independent body that oversees elections, regulates political finance and promotes public confidence in the integrity of democratic processes (See Further reading- Electoral Commission, 2021). The UK's political regulator has separate funding and a remit to oversee electoral coverage, including ensuring impartiality across the main traditional broadcast channels. The main UK broadcasters are licenced by government and required to operate with codes of practice about neutrality to protect their impartiality (See Further reading- Electoral Reform Society, 2016).

Next to mainstream broadcast regulation, the Electoral Commission (2016 - See Further reading) claim to have neither the budget nor resources for similar regulation across the internet. Therefore, political campaigns on social media receive limited regulatory oversight. Within the timeframe of a short political campaign and when sending discreet messages to microsegments, social media campaigns may have little external visibility; therefore, limited opportunity exists to identify, challenge or correct messages that might mislead voters.

Alongside regulation, protection for democratic processes may come from accountability at the ballot box: an electoral cycle provides voters with the opportunity to 'hold to account' people who have sought and won power. This democratic safeguard is absent when a referendum is a once in a half-century event, like Brexit.

Political Marketing and PR

Public Relations (PR) can serve many organisations, including political parties (Gunning, 2019), and in a democracy where political parties are successful because of public support, this involves managing relationships with the public (PR). Strategically, PR can help to insure credibility (Gunning, 2019) (e.g. through ethical audits and with policies on issues of public concern) and PR can build reputation (e.g. fostering relationships with stakeholders); tactically, PR may amplify brand equity (e.g. supporting marketing campaigns) and capture public attention (e.g. with publicity stunts or sponsorship).

To build public awareness, traditional political communication campaigns have employed 'visibility' tools (Gunning, 2019) that rely on media attention (e.g. publicity stunts, public events, news releases and media interviews). PR driven media publicity can help to frame a 'news agenda' (McQuail, 2005), to heighten public consciousness of specific issues. Rather than pressing people into *what to think*, publicity tools may help to shape what people *think about* (O'Guinn and Faber, 1991). When political issues gain widespread publicity this may raise public consciousness and promote a heightened sense of an issue's importance. While political PR campaigns tend to reach wide audiences by attracting mainstream media coverage, messages communicated via such publicity are difficult to control (Gunning, 2019). In contrast, advertising can be controlled, using paid-for media to reach specific audiences

(McQuail 2005) with messages framed to shape perceptions, influence opinions and gain voter support.

Vote Leave's campaign combined publicity and discreet social media advertising: they gained widespread media attention and public attention with controversial PR stunts, but little widespread public attention or Electoral Commission attention for extensive advertising across social media channels. *Vote Leave's* lead strategist, Cummings (2016, n.p. - See Further Reading), claims:

> *"Almost all of Vote Leave's digital communication and data science was invisible even if you read every single news story or column ever produced in the campaign or any of the books so far published '.*

Vote Leave's declared spending included £2.7 million on advertisements messages about EU membership targeting selected voters, mainly via Facebook (See Further reading- DCMCS, 20191a). In a post Referendum enquiry by the Electoral Commission, Facebook released 1433 different campaign messages, and reported these were seen more than 169 million times and involved a peak of activity in the last three days of the Referendum campaign. The Electoral Commission (2016- See Further reading) ruled that *Vote Leave* had acted illegally over social media advertising by coordinating this with related organisations, e.g. 'BeLeave' (sharing *Vote Leave's* office, Cadwalladr, 2017a). However, this may be a significant underestimated, on his blog Cummings (2016, n.p. - See Further Reading) claims:

> *"In the official 10 week campaign we served about one billion targeted digital adverts, mostly via Facebook and strongly weighted to the period around postal voting and the last 10 days of the campaign. '*

Level Playing Fields?

To prevent a larger scale promotional campaign from swaying the outcome (e.g. with funding from wealthy supporters), the Electoral Commission sought to ensure the Referendum was fought with similar funding, so votes were earned with the strength of arguments rather than the scale of a campaign. Officially, both camps had a £7 million budget cap and access to other support including free postal leaflet distribution; any spending on individual items above £10,000 during the campaign period also needed to be declared.

Half of the permitted £7 million spending *Vote Leave* declared went to a specialist internet data company, AggregateIQ (AIQ) (Doward and Gibbs, 2017 - See Further Reading). AIQ use machine learning to gather personal data for profiling and targeting microsegments through social media channels; they had close ties to Cambridge Analytica and other companies that developed voter relationship software while involved in data breaches and illegally shared and gathering personal data (See Further reading- DCMS, 2019a). AIQ gave *Vote Leave* technology to control a social media campaign, for identifying and reaching microtargets sensitive to specific issues. With extensive social media messages, selected voters were targeted with 'dark' advertisements containing deceptive content (BBC, 2018), including factually incorrect and deceptive claims blaming EU membership for issues like immigration (see examples via: DCMSb, 2019- See Further reading). Data on normally hard to reach voters was also gathered using a football completion (Cummings, 2016; BBC, 2016a- see Further Reading). Cummings (2016, n.p. - See Further reading) also claims to have developed bespoke campaign management software: a '*Voter Intention Collection System*' (VICS):

'This was a gamble … the campaign had to do things in the field of data that have never been done before…integrating data from social media, online advertising, websites, apps, canvassing, direct mail, polls, online fundraising, activist feedback, and some new things we tried such as a new way to do polling… . We were the first campaign in the UK to put almost all our money into digital communication… We served about one billion targeted digital adverts, mostly via Facebook and strongly weighted to the period around postal voting and the last 10 days of the campaign.'

Acquiring the technical capacity and databases to model microsegments for targeted social media advertisements required an investment in technology that the Electoral Commission (2016- See Further reading) have since recognised was unfeasible to do within the ten week timescale of the Referendum campaign. Cummings (2016 - See Further Reading) acknowledges this in his blog, see above. Therefore, a significant prior investment in campaign capability was made by *Vote Leave* outside the regulatory timeframe the Electoral Commission used to balance campaign spending. The spending which funded access to social media during the campaign was opaque; Cummings (2016 - See Further Reading) now claims that about one billion targeted digital advertisements were distributed, far more than the number declared to an Electoral Commission Enquiry. Declared media spending by *Vote Leave* was parallel to media spending on connected campaign messages by other organisations closely tied to *Vote Leave* (Cadwalladr, 2017a), often using messages that shared a similar ballot box logo. The Electoral Commission, (2016- See Further reading) fined *Vote Leave* for overspending.

Vote Leave's Campaign

Without being an established political party, *Vote Leave* started the Referendum campaign without a recognised public identity. Therefore, they needed to gather support for their *Vote Leave* campaign, akin to a political brand. Like celebrity endorsement, if a public personality becomes a spokesperson for a political cause they may lend some of their public profile to the campaign; a process of *meaning transference* (Jain and Roy, 2016).

With an established public image, Johnson's reputation drew on notoriety from his early career as an anti-European journalist and media humourist, and a political career as a previous Mayor of London. By 2016, Johnson's reputation as a relatively nonconformist celebrity politician was valuable to *Vote Leave*; he helped to present a suitable counterpoint to the *Remain* cause. *Remain* were led by establishment politicians, in government, tainted by years of policy directives around austerity, and cutbacks in public services. Johnson's unconventional political persona, 'branded' with a crafted and dishevelled blond hairstyle (Cadwalladr, 2011), presented an alternative political style. He had public's tolerance as a politician who was expected to take humorous liberties with the truth.

Exploiting public tolerance of Johnson's media popularity, *Vote Leave* launched their red 'campaign bus' with provocative campaign message. With strong visual imagery from the bus, Johnson's trademark image (his signature dishevelled hair) and a controversial message about re-directing £350 million of EU funding to the NHS, this symbol-rich media event generated extensive publicity to help establish a public identity for *Vote Leave*. The publicity was amplified with media coverage of complains about the £350 million figure from opponents and official bodies; the Chair of the UK Statistics Authority described the NHS message as '*a clear misuse of official statistics*' (Norgrove, 2017 - See Further Reading). The

publicity made Johnson, the bus and the message publicly recognisable symbols for *Vote Leave,* campaign symbols that could be used in other campaign messages. The imagery also established public consciousness for one of the campaign's key messages: *health*, and for funding of the NHS *'instead'* of funding the EU (with the NHS an institution treasured by the public).

Kettle, (2021, p.2 - see Further Reading) analysed this message (presenting the UK as escaping from vassal status under the EU):

> *The NHS relationship was made more visceral using the NHS logo and colour scheme (middle line). The £350 million sum was given emphasis using a larger and bold font. The word 'let's' (start of the second line) was not capitalised, suggesting it followed on from the line above and linking £350 million to our NHS. The word 'our' implied a shared collective effort with Vote Leave, in the same line. The third line alluded to a secondary campaign message: regaining national sovereignty (a reminder of a consistent campaign theme: that 'Brexit would liberate and empower us').*

The disputed £350 million claim was plausible to many people as an 'emotional truth' (Spencer and Oppermann, 2020), it had capacity to be 'felt' as true in essence. In the context of public tolerance of Johnson's elastic approach to truth, the claim presented him as a champion for investment in the NHS. After years of financial austerity under *Remain's* establishment spokesmen, the claim presented *Vote Leave* as a counterpoint to *Remain*, and Johnson as a hero for the NHS, seeking to invest in 'our' favourite institution.

The sum, £350 million (the disputed UK EU membership cost), was repeated in social media messages for alternative spending priorities (presumably based on psychographic and geographic target profiles), e.g. schools and maternity units.

With controversial publicity and images of the bus-event shared widely on social media to create a cause célèbre, *Vote Leave* established campaign icons and framed a proposition that supporting *Vote Leave* would be supporting the NHS. This proposition drew on the public tolerance of Johnson taking liberties with truth. With widespread public recognition for *Vote Leave's* campaign symbols and an NHS proposition that could resonate with the public, *Vote Leave* had architecture to develop a social media campaign. Together with technology developed with AggregateIQ, *Vote Leave* could stage a social media campaign that took liberties with the principles of democratic process, taking advantage of the Electoral Commission's limited regulatory purview towards digital channels. Thus, *Vote Leave* had the capacity to use powerful and discreet messages that could also take liberties with truth.

Vote Leave and Powerful Messages

With an established public identity, *Vote Leave* were in a position to build messages with personal relevance for specific target voters. Immigration, one of the main issues Vote Leave used, illustrates the integrated campaign mechanism: intensifying publicity with social media messages. *Vote Leave* used mainstream media publicity both to heighten public awareness of their campaign issues and to prime sensitive voters especially reactive to these issues. Once primed, voters could be more easily influenced by social media, with messages calculated to shape perceptions and influence opinions, e.g. by framing sensitive concerns as connected to EU membership, and presenting an answer for concerns as leaving the EU.

Vote Leave social media messages were seen many times; the figure is differently reported (e.g. '*more than 169 million times*', Electoral Commission, 2016; '*about a billion times*', Cummings, 2016, n.p. - See Further reading). Many messages included misleading or false content (see DCMS, 2019b - See Further Reading) and false information can be deceptive if it is accepted as true. Like faith and religious conviction, there may be no need to '*know*' a truth to '*feel*' something is 'true' (Turpin *et al.,* 2019); as with fake news, when information helps someone make sense of their world the message may 'feel' right, even when based on falsehoods. Provoking anxious feelings over an issue (e.g. immigration) and framing a solution to these anxieties (e.g. leaving the EU) can suggest a way of dealing with the world, a receptive audience may have heightened motivation to accept a message as offering an emotional truth to re-establish emotional equilibrium (Festinger, 1957).

Issues of multiculturalism can trigger emotional reactions and anxiety due to perceived potential risk of incomers (immigration) causing unwanted changes to a way of life. This is a threat from perceived 'outsiders' which the social biologist Wilson (2012) relates to a deep-seated evolutionary bias: *fear of the other*. People tend to live in social communities bound by familiar and shared cultural reference points; unfamiliar cultural contexts can feel uncomfortable or threatening. Even when people have the intellect to recognise this bias and overcome it, Wilson (2012) identifies it as a typical primate instinct and a potentially visceral and relatively instinctive mechanism; *Vote Leave* exploited this in their campaign by framing immigration as a threat.

Anxiety over what is not familiar, like another culture, may trigger the bias of risk aversion (a psychological mechanism balancing cognitive and emotional information processing for decision making that prioritizes emotional judgment, Kahneman, 2012). Immigration,

perceived as a 'feeling' of threat about loss of a familiar lifestyle and cultural identity, was a main issues of public concern Cummings (2014 - See Further Reading) identified in earlier research. It was also evident in support for the anti-European party, UKIP.

As a campaign issue, immigration gained public prominence in widespread publicity triggered by *Vote Leave* press releases and media events, and by using controversial claims framing immigration as a threat to a British way of life. This publicity helped to prime sensitive voters and activate their concerns. Follow-up social media messages could trigger a strong emotional response using untrue claims about additional countries joining the EU generating large-scale immigration. Framing 'leaving the EU' as a way to deal with anxiety over a risk of loss, i.e. immigration as a threat to British lifestyle (triggering a psychological bias to avoid loss; 'risk aversion', Lehrer, 2009, and harnessing anxiety over 'outsiders').

Vote Leave connected membership of the EU to a major immigration threat. They portrayed staying in the EU as opening the UK to mass immigration from Turkey, claiming Turkey's EU membership was imminent. For this, *Vote Leave* created widespread media publicity in traditional channels, to heighten public awareness and prime more anxious voter's concerns, and then used social media messages to aggravate immigration anxiety (Hobolt, 2016 - See Further Reading).

Turkey offered an affective vehicle to amplify immigration issues. The Turkish Prime Minister had paid a recent visit to the UK, implying active diplomacy for Turkey seeking EU membership. Turkey was also in the public eye because of football: in the week *Vote Leave* launched its immigration theme, the Turkish football team were playing England in a friendly

warm-up for the European Championship. Turkey also has a relatively large Muslim population: news stories about Muslim related terrorism made Turkey seem threating to many UK voters.

In an integrated campaign, and to win public prominence for the immigration issue, *Vote Leave* employed PR stunts as media events. By using contentious information, *Vote Leave* staged a week of coordinated PR activity using multiple channels claiming that five new applicants were joining the EU (Albania, Macedonia, Montenegro, Serbia, and Turkey) which would lead to millions of people having the right to move to the UK.

In May the immigration debate intensified across mainstream media for the next few days including Gove making a speech and releasing a video showing brawling in the Turkish Parliament. His speech included provocative falsehoods, each likely to be of specific concern to different audiences: Turkey joining the EU imminently; Turkish citizens being a national security threat; threats of Islamic and Muslim connected terrorism; a high crime rate in Turkey being a threat; Turkey would be a drain on public services; and claims that the high birth-rate in the Turkish community would cost the NHS maternity services an extra £400m within 10 years of the country joining the EU. The speech was widely reported across media channels through Saturday, and he repeated the claim in news channels that EU immigration would overwhelm the NHS by 2030, and that 5.2 million migrants would be coming (Boffey and Helm, 2016- See Further Reading).

During the same week, *Vote Leave* released a poster, widely reproduced across traditional media, showing a trail of dirty footprints passing through a wide-open doorway looking like a British passport with a poster caption:

'TURKEY (population 76 million) is joining the EU '

(Boffey and Helm, 2016 - See Further Reading).

Generating widespread publicity, including for contentious and ambiguous messages, the *Vote Leave* campaign culminated with a Sunday morning (22/5/2016) interview on the BBC's Andrew Marr show. In this interview, the junior Conservative Defence Minister and *Vote Leave* supporter, Penny Mordaunt, repeated astounding claims she had released to the Observer newspaper that day (front page), claiming that Turkish immigration would result in a million people coming to the UK in the next eight years should UK stay in the EU, even though Turkey is not in the EU. In her TV appearance (See Further reading- BBC, 2016b, n.p.) she repeated the claim and when challenged by Marr, Mordanut claimed the 'Remain' group were doing the 'scaremongering' and that:

> '*This is our last chance to have a say on this, we're not going to be consulted on whether those countries should join… Those countries are going to join, it is a matter of when …. I think with the current situation, the migrant crisis and other issues going on in Europe, we would be unable to stop it… I don't think that the UK will be able to stop Turkey joining…*',

and she claimed that the EU Referendum was British voters' only chance to prevent that eventuality, and that the UK would not have any veto over Turkish accession (See Further reading- BBC, 2016b; Withnall, 2016).

These claims, and similar misleading claims across the previous week, were factually inaccurate but attracted media and public attention to the immigration issue, giving it prominence in public consciousness. Seeing senior politicians in the mainstream media claiming the UK was facing a tsunami of foreign arrivals was likely to heighten concern,

especially amongst immigration sensitive voters, preparing them for supportive social media messages. However, people less sensitive to 'dog whistle' stories, and not targeted via social media, might brush aside such exaggerated claims; thus, overlooking the potential for priming responses to social media messages.

Nearly a week later, 1 June, three weeks away from Referendum, Johnson, with Gove and Patel (of South Asian heritage), made news headlines promising an 'Australian Style' points immigration system, if *Vote Leave* won. Ending an automatic right for EU citizens to come the UK, it promised to open doors to suitably qualified people from the rest of the world. It lent respectability to the *Vote Leave* approach to immigration after the previously contentious claims with separated messages: it alluded to less immigration (shutting an EU door); and it promised more immigration to a groups of voters with Asian heritage by providing easier UK access to extended family. This was communication preparing the ground for targeted social media messages with alternative immigration messages, both supporting leaving the EU.

Coordinated to have synergy with traditional media publicity, social media messages were sent to target voters with known sensitivity to activate emotional motivation, using false information about EU joining status, and other contentious issues, including:

- a portray of an anxious looking young woman, a list of countries on the fringe of the EU as a caption (referencing countries mentioned in traditional publicity), above an ambiguous caption, 'Seriously'

- a massive wartime style invasion arrow leading from Turkey to the UK; it would have been instantly familiar and understood by many views because it echoes credits of a popular Second World War TV comedy, '*Dad's Army*'. Reaction buttons provided an opportunity to

demonstrate and activate conviction, and gather data on the effectiveness of each version of the ad. For examples, see Further reading – BBC, 2018.

The social media messages sent by *Vote Leave* and associated organisations have an appearance of 'basic' structure: typically a picture, a logo, and a couple of lines of text, and often with a question or call to action (CTA) to help capture response. The simplicity belies sophistication behind the creative strategy; it gives messages an authentic and disarming grass-roots 'feel', articulating concerns rather than suggestive of a sophisticated campaign. Some social media power stems from the potential to share with peers, grass-roots style authenticity would encourage messages to be shared or 'Liked' to enhance engagement and social confirmation within targeted microsegments.

Powerful, Persuasive, Political Promotion

Influencing target markets with promotional campaign messages often involves a balance between **reach** (media access: *media journey)* and **message strategy** (content intended to shape attitudes and behaviour: *brand journey)* (Saunders, 2004). The *Institute of Practitioners in Advertising* (IPA) have published award winning and effective campaigns for decades demonstrating that successful campaigns often *integrate* different media and promotional tools to make best use of their different capacity, and to multiply their impact: synergy from integration.

Next to other forms of electronic communication, social media are a relatively recent promotional campaign option. Different channels have specific capacities for sharing information: matching channels capacity to promotional messages is required for successful campaigns (McQuail, 2005). The sense of personal control over access and navigation can

make the internet and social media a less passive medium than traditional channels of mass communication, to heighten engagement (McCullough, 2013). Higher engagement also supports higher involvement and a stronger capacity for messages to influence attitudes (Petty and Cacioppo, 1986). Therefore, social media messages can expect to make a strong impression relative to traditional communication channels. This is further reinforced by proxy interpersonal communication via peer confirmation when content is shared or referenced within personal social media networks (Zuboff, 2019). Social media's interactive capacity supports reinforcing tentative opinions because attitudes can be influenced by the perceptions of other people's opinions (Fishbien and Ajzen, 1980) and interpersonal confirmation supports attitude adoption across populations (Rogers, 2003). Furthermore, social media can support personal environmental surveillance (McQuail, 2005), and the habit of frequently monitoring social media makes them potentially powerful tools for timing messages to create timed response peaks, e.g. voting behaviour. Therefore, supporting the role of social media as a potentially important addition to promotional campaign practice.

Vote Leave integrated publicity and social media. Commercially, measuring integrated campaign synergy typically involves econometric modelling (accountability: return on investment, ROI). Without commercial discipline, political campaigns are not justified with ROI but funded by wealthy supporters, political donations or state support. Nevertheless, *Vote Leave* had powerful campaign controls, cybernetic loops in their AI driven campaign. With AIQ technology and their VICS tool, *Vote Leave* used iterative feedback to test and enhance social media messages; Cummings (2016- see Further Reading) says:

> *"We ran many different versions of ads, tested them, dropped the less effective and*
>
> *reinforced the most effective in a constant iterative process. We combined this*

feedback with polls (conventional and unconventional) and focus groups to get an

overall sense of what was getting through. '

IPA awards demonstrate how integrated promotional campaigns can influence attitudes that support decisions (e.g. to buy or vote). Raising public consciousness for *Vote Leave's* campaign issues involved publicity integrated with social media targeting select microsegments. To identify motivational issues for voters, and receptive targets within social media, *Vote Leave* drew on '*Business for Britain*' research (Cummings, 2014 - See Further Reading); this identified '*anxiety issues*', including: multiculturalism and *immigration*, *job insecurity,* investment in *health care,* investment in *education, animal welfare, EU bureaucracy*.

Vote Leave used *anxiety issues* to develop social media messages with emotive triggers, linking issue to EU membership and framing *voting to leave* as a way to tackle these issues (see Further Reading, DCMS, 2019b). *Vote Leave* spending involved significant online activity; Cummings (2016, n.p. - See Further Reading) says, "*We were the first campaign in the UK to put almost all our money into digital communication* '. Much of the declared spending was with AIQ; their president, Zack Massingham, told the Observer his company was involved in engaging supporters and tailoring messages to them:

'*It's about communicating with them in a timely and meaningful manner, not giving them too much content, and what you do give them is within the lines of what they want to hear*' (Doward and Gibbs, 2017. p.3 - See Further Reading).

Integrating social media into a campaign can provide reach with timing to distribute content for influencing decisive moments in decision-making (e.g. voting) and *Vote Leave's* campaign had high activity peaks in the three days before the Referendum. When extensive social media spending was later revealed, concerns were expressed over limited transparency during the campaign, and over the risk of misleading and hidden messages deceiving voters (Kuenssberg, 2021 - See Further Reading).

Promotional Practice and Democratic Processes

An Electoral Commission enquiry found illegal coordination in the leave campaign: *Vote Leave* were fined for exceeding official spending limits by nearly £500,000 and referred to the police for prosecution (no legal action was taken). Of the official £7 million spending limit, *Vote Leave* spent £3.9 million with the data agency, AIQ (Cadwalladr, 2017a). In addition, three other independent 'leave' groups (*BeLeave*, *Veterans for Britain* and the *Democratic Unionist Party*) spent a further £757,750 with AIQ. These groups were not legally supposed to cooperate (Cadwalladr, 2017a).

Sharing AIQ technology across leave groups raises questions not just about the level of spending but the extent of coordination between claimed independent groups that could have made the campaign scale much larger than officially regulated. Combined with likeminded but seemingly independent groups, including *BeLeave* (based in the *Vote Leave* office), their combined campaign spending was declared as £13,332,569 (Electoral Commission, 2016 - See Further Reading). Other less visible campaign investments are suspected (Cadwalladr, 2017a - See Further Reading), including in-kind services to *Vote Leave* provided by digital agencies owned by wealthy overseas supporters of *Vote Leave's* cause: a significant amount of campaign spending appears hidden from scrutiny.

Another less visible feature of *Vote Leave's* campaign is spending outside the regulated ten-week Referendum period, the timescale the Electoral Commission used to measure spending and media costs (these measures are designed to protect democratic processes to balance presentation of rival arguments). The Electoral Commission (2016 - See Further Reading) now accept that the social media campaign *Vote Leave* mounted must have been supported by considerable prior investment in digital capability. However, the Electoral Commission (2016 - See Further Reading) has stated that it does not have the resources to monitor online campaign activity in real-time, and it does not have powers to provide effective deterrents in one-off referendums. The Electoral Commission believe the major costs of an online campaign involve building data bases and data models, and that some of these activities would have needed to take place outside the regulated campaign period (Cadwalladr, 2017b - See Further Reading). A conclusion in Cadwalladr's (2017b - See Further Reading) study, and echoed in studies from Kings College (Moore and Ramsay, 2017), is that UK electoral law has not been able to keep up with political practice; i.e. the mechanisms in operation for online campaigning are largely outside current regulation. The Electoral Commission failed to regulate Referendum campaign practice with a level of understanding that reflects the potential for powerful influence across today's media landscape.

The *Vote Leave* innovative campaign exploited the regulatory framework to help win political support. Advertising campaigns challenging regulatory frameworks have occurred in the commercial world, Benetton famously used social taboos for this in the 1980s. However, the ASA has helped to manage an evolving framework of enlighten self-interest, thus making commercial campaigns relatively trusted. UK politics has different regulation. Without a

formal written constitution, UK politicians are expected to be in-step with ethical standards that match public morality, and resign when found to have behaved dishonourably (i.e. outside this unwritten code). Hence, an MP is known as an Honourable Member inside Parliament, and following the letter and the spirit of law is an issue of politician honour. Therefore, honouring the letter and the spirit of regulation might be expected from people attempting to win political power. There is clear evidence that *Vote Leave's* Referendum campaign successfully circumnavigated democratic regulation. The risk of politicians winning elections at any cost and without an honourable respect for democratic principles is checked by having an effective regulatory system to restrain them.

Vote Leave's combination of public and private communication involved distributing inaccurate messages to exploit emotional vulnerabilities, and using technology that was beyond the control of the regulatory body, the Electoral Commission. Rather than follow an honour based code of political practice, the politicians who led the *Vote Leave* campaign were involved in circumnavigating electoral regulation, in campaign practice that used highly contentious campaign messages and in using illegally combined campaign resources. If a regulatory body is to protect future democratic processes, this might involve strengthening the Electoral Commission and ensuring its independence. However, at the end of 2021, a UK government led by politicians who won the Referendum are passing an electoral bill into law to remove the Electoral Commission's independence and oblige them, in future elections, to adopt 'strategy and policy' directed by government.

Suggestions for future research

- What legislative approach should regulate all advertising, including political advertising?

- Should the digital marketing and communication industry be involved in updating (and policing) a common code of advertising practice because, as with the role of the ASA, self-interest is expected to help avoid strict cumbersome legal regulation?

- Could a voluntary code be updated quickly enough to regulate promotional practice as new applications (including games) and digital communications platforms emerge?

- How can independent businesses earning revenue from digital/social media advertising be enticed to police well-paying forms of advertising linked to e.g. political campaigns?

- How can the political process be best protected? (Should regulation be overseen by a body independent politicians in current power or should people who have attained political power be able to alter the regulatory framework to set the strategy and policy the regulator must follow?)

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