

Election integrity checklist

prepared in the framework of the European
Cooperation Network on Elections

This document should not be considered as representative of the
European Commission's official position.

INTRODUCTION

Supporting election integrity and promoting standards and good practices for free and fair elections are especially crucial, particularly in light of technological advancements.

Amid ongoing pressures and challenges, safeguarding electoral integrity demands leveraging a diverse set of tools, taking a whole-of-government approach as well as engaging with a wide range of stakeholders.

Election integrity entails upholding democratic standards, including universal suffrage, political equality, and robust protection of the electoral process from risks and threats. This requires, among other things, comprehensive, stable, fair, and workable frameworks; transparent, independent, impartial and professional election administration; sound electoral operations and accurate election results; openness to third party observation of the process; accessible and fair election dispute resolution mechanisms; inclusive and wide-ranging participation of voters and candidates; secure election infrastructure and free media, awareness raising and protected information space.

Election integrity also requires that fraud, malpractice, systemic manipulation and other challenges that would undermine electoral integrity are correctly identified and effectively and swiftly addressed.

This checklist has been compiled primarily based on the 2023 Commission Recommendation on inclusive and resilient elections¹ and discussions in the European Cooperation Network on Elections to support Member States' efforts to uphold election integrity.

Member States could use this checklist as a starting point and a reference to develop national operational checklists or similar tools, based on requirements set out in national law and practice in line with international standards and accompanied by the necessary resources.

This preliminary checklist will be regularly reviewed and discussed within the European Cooperation Network on Elections.

¹ <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32023H2829>

1. LEGAL FRAMEWORK

Goal: The legal framework ensures free, fair and resilient elections, in full respect of democratic standards and fundamental rights.

Criteria:

- ✓ The legal framework is assessed and reviewed regularly against international standards and the evolution of the threat landscape, and the findings thereof are shared with all the relevant authorities.
- ✓ Regulatory gaps and potential non-compliance with international standards are appropriately addressed in a timely manner following wide consultations, including by paying due consideration to recommendations made by international and domestic election observers.

2. ELECTION ADMINISTRATION

Goal: The election administration is credible, independent, impartial and accountable in the performance of its duties, and has the competences and resources to deliver free, fair and resilient elections.

Criteria:

- ✓ Potential exposure to coercion and pressure, including threats, harassment and undue political influence, is limited through appropriate mechanisms and safeguards.
- ✓ Election officials who are targets of threats, harassment or intimidation in their capacity as elections officials have access to support resources, including guidance, training and legal assistance.
- ✓ Professionalism of election officials is reinforced, including through adequate selection and continuous training.
- ✓ Election officials have the necessary skills to perform their functions, including legal, administrative, budgetary, procurement, IT and cybersecurity skills, particularly if information systems are used in the electoral process.
- ✓ Independence and impartiality of oversight mechanisms are adequately supported.

- ✓ The work of election administration is transparent and subject to appropriate scrutiny.
- ✓ The remit of election administration is sufficiently broad to cover all stages of the electoral process.
- ✓ The election administration is allocated the necessary human, financial and logistical resources for an effective discharge of its functions.

3. COOPERATION AND PREPAREDNESS

Goal: Cooperation frameworks include all relevant entities, and preparedness enables anticipating and responding to issues that could potentially affect elections.

Criteria:

- ✓ Election authorities cooperate with stakeholders, including civil society and election observers, and relevant authorities throughout the electoral cycle, including outside election periods.
- ✓ National election networks are established and include, for instance:
 - national authorities with competence for electoral matters,
 - competent authorities responsible for the auditing or supervision of political actors,
 - national authorities in charge of monitoring and enforcing rules related to online activities relevant to the electoral context,
 - law enforcement authorities,
 - data protection authorities,
 - cybersecurity authorities,
 - authorities addressing information manipulation,
 - Digital Services Coordinators,
 - national media regulators,
 - authorities overseeing election costs.
- ✓ Before each election, robust and comprehensive project plans are prepared, based on lessons learnt and results of risk assessments, to support the delivery of the election.
- ✓ Preparedness against contingencies that could affect the smooth run of elections is ensured, including through awareness raising, and by identifying risks and the corresponding risk owners, their likelihood and

risk mitigation measures.

- ✓ Members of national election networks establish, as necessary, protocols and ways of working for cooperation and information sharing, to prevent, protect against, respond to, mitigate, and recover from disruptive incidents affecting elections.

4. UNIVERSAL AND EQUAL SUFFRAGE

Goal: Voting rights are accessible and inclusive, ensuring broad participation.

Criteria:

- ✓ Voter registration procedures enable universal suffrage.
- ✓ Candidate registration procedures enable participation of eligible citizens.
- ✓ Measures to enable voting and promote broad and inclusive participation, adapted to the needs of different groups, such as women, persons with disabilities and mobile EU citizens, are taken.
- ✓ Information on basic rules and practical arrangements related to the exercise of electoral rights is provided, in a comprehensive, clear, simple way and adapted to the needs of different groups, such as persons with disabilities and mobile EU citizens.
- ✓ Complementary voting methods, such as advance voting and postal voting, are in place, particularly for persons with disabilities.
- ✓ Reasonable accommodation is provided to enable persons with disabilities exercise their vote.
- ✓ Each vote has equal weight.
- ✓ Political parties and candidates benefit from fair and equitable opportunities to participate in the election campaign.
- ✓ Safeguards are in place to prevent multiple voting and other forms of ballot fraud.
- ✓ Organisational and logistical settings provide genuine voting opportunities, including by providing sufficient polling places, voting booths, ballot boxes, and ballots, and other election-related supplies,

such as paper, ink, pencils, stamps, envelopes, etc.

5. INFORMATION INTEGRITY

Goal: The information environment and freedom of voters to form their opinion are protected against information manipulation, interference and disinformation.

Criteria:

- ✓ Political parties and campaign organisations are encouraged to adopt campaign pledges and codes of conduct on election integrity and fair campaigning.
- ✓ Measures are taken to enable voters to form opinions independently based on information from a plurality of sources and free from manipulative interference.
- ✓ Mechanisms and procedures are put in place to support and facilitate the swift transmission of public messages pre-bunking or debunking information manipulation and disinformation about election procedures.
- ✓ Information of public interest on elections is proactively brought to the public domain. Documents regarding the electoral process, including judgments, findings, and evidence of election-related proceedings, and legal reasoning for decisions, are publicly accessible and accurate.
- ✓ A pluralistic media promotes citizen access to information, and the media is free to play an impartial and objective role in covering electoral issues.
- ✓ Political parties provide information on the organisations, foundations and other legal entities affiliated with them or campaigning on their behalf.
- ✓ Political parties pro-actively provide information on their use of political advertising including on the amounts spent on political advertising and the sources of funding used.
- ✓ Political advertising services providers and other players have a compliance framework for the applicable rules, including as relevant the

Digital Service Act, the AI act, the Regulation on transparency and targeting of political advertising.

- ✓ Specific measures and mechanisms are in place to support and enable election observation.
- ✓ Competent authorities conduct regular assessments of the information landscape and relevant risks and take the necessary preparedness measures to protect it from information manipulation and foreign interference. Such assessments and measures are shared within national election networks.
- ✓ Cooperation protocols, mechanisms and procedures exist for situations where the integrity of the information environment is disrupted.
- ✓ Competent authorities cooperate, among others, with media and online platforms regarding sources of verified information related to electoral procedures to enhance the dissemination of reliable information and restrict the spread of inaccurate or manipulated content around elections, in cooperation with Digital Services Coordinators where appropriate.
- ✓ Information about electoral rights is accessible and reliable.

6. ELECTION-RELATED INFRASTRUCTURE

Goal: Election-related infrastructure is adequately protected.

Criteria:

- ✓ Entities operating election-related infrastructures, which are critical for the organisation and conduct of elections, are accurately identified.
- ✓ Measures are taken to promote awareness of and planning for all contingencies that could have significant disruptive effects on the smooth running of elections.
- ✓ Risk assessments and stress tests are conducted regularly and results are shared with relevant authorities, such as cybersecurity and election authorities.

- ✓ Pro-active steps are taken to enhance the protection of election-related infrastructures, which are critical for the organisation and conduct of elections, including facilities, equipment, networks, systems.
- ✓ Proactive measures are taken to ensure preparedness for, responsiveness to and recovery from cybersecurity incidents related to elections.
- ✓ Technology used in elections is designed, developed and produced to ensure a high level of cybersecurity.
- ✓ Election authorities cooperate with cybersecurity authorities.
- ✓ Measures are taken to increase awareness on cyber hygiene of political parties, candidates, election officials and other entities related to elections.

7. DATA PROTECTION

Goal: Processing of personal data in an electoral context complies with requirements of data protection law and takes into account the *Commission guidance on the application of Union data protection law in the electoral context*² as well as relevant guidelines of the European Data Protection Board and national data protection authorities.

Criteria:

- ✓ Data protection authorities have the means to exercise their supervisory function regarding personal data processing in elections related matters.
- ✓ Information on data protection requirements and data subjects' rights is made available ahead of election campaigns.
- ✓ National election authorities that are data controllers have a legal basis for processing: a legal obligation or task of public interest based on law for which it is necessary to process personal data.

² COM(2018) 638 final, 12.9.2028, available at eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52018DC0638

- ✓ National election authorities that are data controllers conduct a data protection impact assessment unless that impact is already assessed during the adoption of the law or Member States otherwise deem it necessary prior to processing activities.

8. CAMPAIGN FUNDING

Goal: Campaign funding enables a level playing field and minimizes risks of undue political influence and corruption.

Criteria:

- ✓ Campaign funding is balanced, accountable and transparent, in full respect of international standards and relevant EU and national law.
- ✓ The funding received and the expenditure incurred by a political party and/or campaign organisation, or candidate are transparent and disclosed in regular reports, which are also subject to audits.
- ✓ Public subsidies are available on an equitable basis and are distributed according to an objective, fair, and reasonable formula.
- ✓ Political funding does not interfere with the independence of the political parties and candidates and more generally does not affect equality of opportunities.
- ✓ All political parties and candidates are treated equitably regarding campaign finance and expenditure.
- ✓ Funding from third countries (outside the EU) of national political parties, political foundations, political candidates, campaign organisations and as relevant, political movements is prohibited or otherwise limited.
- ✓ Political parties conduct regular risk assessments related to their funding, particularly on risks stemming from funding from third countries and funding potentially linked to criminal activity including corruption, money laundering and organised crime.
- ✓ Competent authorities maintain and implement policies to prevent, address, and penalize violations in an effective, proportionate and dissuasive manner.

9. ELECTION DISPUTE RESOLUTION

Goal: The election dispute resolution system ensures the effectiveness of electoral rights and the legitimacy of the electoral process.

Criteria:

- ✓ An effective (timely and enforceable) remedy, including the possibility of judicial review, is available for violations of electoral rights throughout the electoral process.
- ✓ Mechanisms for submitting complaints and appeals are accessible. Standardised templates and guidance are available to voters and candidates.
- ✓ Relevant entities are provided with the ability to challenge the results of the election.
- ✓ Competent national authorities and courts are impartial and independent.

10. ELECTION RESULTS

Goal: The will of voters is accurately reflected in the official election results.

Criteria:

- ✓ Votes are counted and recorded accurately in an open and transparent manner.
- ✓ The counting process is verifiable, and the ballots preserved for later review. Counting systems are secured and reliable.
- ✓ Tallies are transmitted to higher levels of tabulation in a secure, transparent and open manner.
- ✓ Mechanisms are in place to correct errors promptly
- ✓ Election results are published in a timely manner on secure platforms, disaggregated at various levels, including by polling station, and broken down by candidates and political parties.