Vote for Free

A Global Guide for Citizen Monitoring of Campaign Finance

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for Electoral Systems

About IFES

IFES advances democracy for a better future. We collaborate with civil society, public institutions and the private sector to build resilient democracies that deliver for everyone. As a global leader in the promotion and protection of democracy, our technical assistance and applied research develops trusted electoral bodies capable of conducting credible elections; effective and accountable governing institutions; civic and political processes in which all people can safely and equally participate; and innovative ways in which technology and data can positively serve elections and democracy. Since 1987, IFES has worked in more than 145 countries, from developing to mature democracies. IFES is a global, nonpartisan organization based in Arlington, Virginia, USA, and registered as a non-profit organization [501(c)(3)] under the United States tax code.

IFES By The Numbers

Reached 25M+
people with
civic and voter
education in 2021

Supported 30
elections in 2021,
training 300K+
election officials

Worked across 58
countries in 2021

Acknowledgments

About the author

Dr. Magnus Ohman has worked with political finance issues since the 1990s, specializing in effective disclosure and oversight, transparency and sustainable solutions. He has researched both country analyses and macro-level trends and practices, and he has assisted legislators, implementing agencies, civil society, media outlets and political parties.

Magnus has supported political finance initiatives in countries such as Afghanistan, Albania, Armenia, Bangladesh, Bosnia and Herzegovina, Bulgaria, Cambodia, Egypt, Fiji, Georgia, Haiti, Honduras, Indonesia, Jamaica, Jordan, Kenya, Kuwait, Kyrgyzstan, Lebanon, Liberia, Libya, North Macedonia, the Maldives, Moldova, Montenegro, Myanmar / Burma, Nepal, Nicaragua, Nigeria, Papua New Guinea, the Philippines, Romania, Serbia, Sierra Leone, Sri Lanka, Sudan, Sweden, Tanzania, Trinidad and Tobago, Tunisia, Ukraine, the UK, the U.S., Yemen and Zimbabwe. His work on these issues has been translated into 20 languages.

Specifically, Magnus has supported civil society groups in the monitoring and raising awareness of political finance in Afghanistan, Bangladesh, Bosnia and Herzegovina, Bulgaria, Cambodia, Georgia, Indonesia, Kyrgyzstan, Lebanon, Libya, North Macedonia, the Maldives, Moldova, Montenegro, Nepal, Nicaragua, Nigeria, the Philippines, Romania, Serbia, Sri Lanka, Tunisia, Ukraine and Zimbabwe.

IFES work to support political finance initiatives is part of the IFES Center for Anti-Corruption and Democratic Trust.

Magnus is also Director of the IFES Regional Europe Office, based in Prague, Czech Republic.

He was the lead writer of the Building Resources in Democracy, Governance and Elections (BRIDGE) module on political finance, and he has a Ph.D. in Political Science from Uppsala University, Sweden.

List of abbreviations

Abbreviation	Meaning
CeMI	Centar za monitoring i istraživanje (Centre for Monitoring and Research) in Montenegro
CFM	Campaign finance monitoring
CSO	Civil society organization
EMB	Election Management Body
FEFA	Free and Fair Election Forum of Afghanistan
LTA	Libyan Transparency Association
OAS	Organization of American States
OECD	Organization for Economic Cooperation and Development
OSCE/ODIHR	Organization for Security and Co-operation in Europe / Office for Democratic Institutions and Human Rights
IFES	International Foundation for Electoral Systems
PET	Parallel Expense tracking
PCIJ	Philippine Center for Investigative Journalism
SMD	Single-Member District
UNCAC	United Nations Convention Against Corruption
USD	U.S. dollar

Foreword

IFES' mission statement is *together we build resilient democracies that deliver for all*. Transparency in how money enters and exits the democratic political process is foundational to a healthy democracy. Without that transparency, political 'ownership' in the system quickly shifts from the voters to corrupt political players with fat wallets. Illicit campaign finance has been called the "original sin" of corruption because of the way it builds and bonds long-term links of corruption between the public and private sectors. And once those links are forged, breaking them requires Herculean effort.

Deterring the corrupting influence of money across the political landscape involves many actors — including lawmakers, political parties, media, and voters. But civil society has an absolutely pivotal role in increasing the transparency and control of money in election campaigns. Through raising awareness and advocacy for both legal reform and changes in behavior, civil society can drive sustainable improvements.

But such work must be based on credible information, and the key tool is the systematic monitoring of money in elections. Indeed, campaign finance monitoring (CFM) has proven a powerful tool in many countries, especially when formal oversight is superficial or shrouded in secrecy.

Vote for Free: A Global Guide for Citizen Monitoring of Campaign Finance represents over a decade of work and draws on the experiences of so many people around the world who have dedicated their time and effort to monitoring, sometimes at personal risk, how money has been raised and spent in relation to election campaigns.

I hope that groups intending to carry out CFM in any country, whether as a dedicated project or as part of larger monitoring initiatives, find this guide to be easily accessible and directly valuable.

IFES is proud of our role in supporting campaign finance initiatives led by civil society organizations in countries around the world over the last few decades, and I know this guide will drive even more important work in the years to come.

Anthony Banbury

IFES President and CEO

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Introduction

Focus of this Chapter: Outline the concepts of political and campaign finance and the monitoring of campaign finance by CSOs, and describe the focus and content of this handbook.

Content of this chapter:

- Why political finance is important, and why CSOs should monitor money in election campaigns
- What this book is and is not (it is not another book on political finance regulation), and who it is for
- List of publications and resources about political finance and its regulations

See page 138 for a glossary of the terms used in this handbook.

Why political finance?

Money is a necessary element of any political process, and democracy cannot function unless political parties and candidates have access to the resources necessary to explain their political program to the electorate and hear how people want their country to be governed. Removing money from politics would seriously undermine and essentially eliminate the democratic process. Unfortunately, money always has a potentially corrupting influence on the political process, whether through vote buying, abuse of state resources or excessive spending that drowns out the voices of legitimate opponents.

Observers of democracy, therefore, must always keep a watchful eye on its role in their political process. This role will differ between countries, and over time in any one country, and new challenges are likely to appear once existing ones are effectively dealt with. Learning from the experience of those who have analyzed and monitored political finance in different countries is essential, though examining how they were shaped because of a particular situation in a given country at a given time is equally important to keep in mind.

Effectively all countries have at least some form of regulation on the role of money in politics, or *political finance* as we will refer to it hereafter.[1] In this guide, political finance refers to *the raising and spending of money for political party operations and election campaigns* (we will generally refer to those who participate in or present candidates to elections as *contestants* – see the glossary on page 138).[2]

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[1]   For more information about political finance regulations in different countries, see the International IDEA (2022).

[2]   As this Guide focuses on campaign finance, it will not give a lengthy description of the financing of political party operations. When elections are referred to in this guide, the term relates to parliamentary, (direct) presidential and local government elections alike, unless otherwise specified.

FIGURE 1. COMPONENTS OF POLITICAL FINANCE

Political Party Finance **+** Campaign finance **=** Political finance

This guide focuses on *how to monitor campaign finance,* or the raising and spending of money specifically for election campaigns. We use a wide definition of campaign finance, which includes not only the money officially raised and spent by registered political parties and candidates, but also sometimes illegal activities such as vote buying and abuse of state ("administrative") resources, hidden media advertising and campaign spending by non-official contestants (sometimes referred to as "third parties," though we will use the term "non-contestant campaigner" in this guide).[3]

FIGURE 2. COMPONENTS OF CAMPAIGN FINANCE (NON-EXHAUSTIVE LIST)

Campaign income & spending · Vote buying · Abuse of state resources · Foreign financing · "Third party" spending · Illicit financing · **Campaign finance**

Why a Guide on campaign finance monitoring?

Civil society has a crucial role to play in increasing the information available and raising awareness about the role money plays in politics in different countries. Many stakeholders around the world have realized the importance of such civil society activities, and many CSOs have carried out various forms of campaign finance monitoring, focusing on a wide range of topics. Dedicated campaign finance monitoring efforts have been carried out by CSOs in more than 30 countries in Africa, the Americas, Asia, Europe and the Middle East.[4] The logic behind this guide is that any group wishing to engage in campaign finance monitoring does not have to start from scratch but can draw on the experiences of others who have done so before them.

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[3]   See further OSCE/ODHIR (2020) *Note on Third Party Regulations in the OSCE Region.*
[4]   Many, though far from all, these monitoring efforts were supported by IFES.

The book *Open Society Institute Monitoring Election Campaign Finance; A Handbook for NGOs*, published in 2005, is especially useful when it comes to monitoring of campaign finance.[5] It draws on the comparatively few monitoring efforts that had been carried at that time. In the more than 15 years since the book was published, many more monitoring efforts have been carried out around the world; this guide draws on those experiences. The technological advances in recent years are particularly noteworthy, as they have created significant benefits (and some challenges) for monitoring money in politics. Among these benefits, we have improved online access to public records, more accessible tools for recording broadcast media and platforms for monitoring team communication. The related challenges include the use of cryptocurrencies for campaign donations, and campaign spending on trolling factories and social media advertising that can be difficult to monitor.

Raise public awareness about the importance of transparency

Advocating for reform

Evaluate effectiveness of regulations

Searching for evidence of illegitimate behaviour

FIGURE 3. THE ROLE OF CIVIL SOCIETY IN CAMPAIGN FINANCE OVERSIGHT

Several regional organizations that carry out international election observation missions have published guidelines for their monitoring teams on how to observe campaign finance. The Organization of American States (OAS) published *Observing Political-Electoral Financing Systems: A Manual for OAS Electoral Observation Missions* in 2012, and the Organization for Security and Co-operation in Europe/ Office for Democratic Institutions and Human Rights (OSCE/ODIHR) published its *Handbook for the Observation of Campaign Finance* in 2015.[6] Both of these documents include interesting information about the monitoring of campaign finance in the Americas and Europe, respectively. Given the comparatively short-term nature of international election observation missions, there are however many potential activities related to campaign finance monitoring that international organizations cannot undertake.[7] This guide provides guidance about work that *national CSOs* can carry out using their permanent presence and particular expertise concerning their specific countries. The guidance is based on the eight steps for developing a monitoring methodology that are outlined in the next chapter.

The main recommendations from this guide are summarized on page 113.

Who is this Guide for?

This guide is intended for civil society entities interested in monitoring campaign finance This includes civil society groups, community-based organizations and other non-state actors interested in increasing information and awareness about political finance issues in a country.

This guide focuses mainly on organizations that intend to carry out monitoring that specifically center on campaign finance, though much of the methodology can also serve where Campaign Finance Monitoring (CFM) is intended as part of a larger, long-term election monitoring effort. The guide will also hopefully be of interest to civil society groups, academics and journalists interested in studying political processes in general.

This guide is not intended to directly inform the work of public institutions with legal mandates to carry out formal oversight of political party and campaign finance. IFES has developed an online tool to support such institutions –

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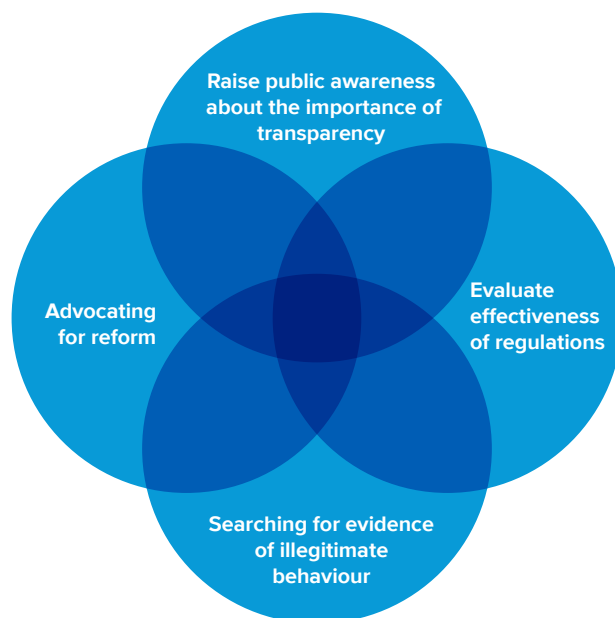
5   Open Society Justice Initiative (2005).
6   Organization of American States (2012) and the Organization for Security and Co-operation in Europe/Office for Democratic Institutions and Human Rights (2015).
7   On this issue, see Ohman (2009).

Oversight, Toolkit for Political Finance institutions, as well as the *Political Finance Oversight Handbook.*[8] As discussed in Chapter 10 of that book, public oversight bodies must be aware of the value that civil society involvement can offer, and in that sense, the present guide may also be valuable reading for those in election management bodies, audit institutions and anti-corruption agencies.

Delimitation of this Guide

One of the claims made in this guide is that good planning of campaign finance monitoring includes determining in advance what will *not* be covered, as it is better to delimit the monitoring effort beforehand and do some things well, than to ambitiously try to cover everything and fail.

In line with this, we should also explain what this guide is *not*.

- This guide is not a general book on the role of money in politics, and how it has been regulated around the world. There are many extant texts of this nature already, see Table 1.

- This guide does not cover how to monitor political corruption in general. Rather, it sheds light on the flow of money into and out of election campaigns. For a peer review approach to the fight against corruption, see IFES (2021).

- While this guide can be of value for international election observations missions, they are not this publication's main target audience. Refer back to Ohman (2009) and the OAS and OSCE manuals mentioned above for more specific content on this subject.

- As mentioned, this book deals with campaign finance oversight by civil society entities, not by public bodies with legal oversight mandates. The distinct roles between state control and social oversight are explored further in Table 2, which was developed by Bruno Speck and first published in a U4 report.[9]

TABLE 1. GENERAL TEXTS ON POLITICAL FINANCE AND ITS REGULATION

Commonwealth (2020) *Political Finance Regulation, A Best Practice Guide to Commonwealth Legislative Approaches*
IFES (2009) *Regulating Political Finance, the Global Experience*
International IDEA (2012) *Funding of Political Parties and Election Campaigns*
Mendilow & Phélippeau (eds.) (2018) *Handbook of Political Party Funding*
Muriaas, Wang & Murray (eds.) (2020) *Gendered Electoral Financing*
Nassmacher, Karl-Heinz (2009) The Funding of Party Competition: Political Finance in 25 Democracies. Nomos.
Norris, Pippa & Abel van Es (eds. 2016) *Checkbook Elections?: Political Finance in Comparative Perspective*
OECD (2016) *Financing Democracy Funding of Political Parties and Election Campaigns and the Risk of Policy Capture*

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8   See www.IFES.org/oversight and IFES (2013).
9   Speck (2008) page 4.

TABLE 2. THE ROLE OF STATE CONTROL AND SOCIAL OVERSIGHT

	State Control	Social Oversight
Role	Guarantee compliance with the law	Empower citizens to support or reject parties; oversee State control [of campaign finance]
Criteria [for oversight]	Law and regulations	Standards of behavior accepted by society
Powers	Investigative and sanction misbehavior	Uncover and denounce unacceptable political finance links
Weaknesses [of oversight]	Depending on reporting of misbehavior Poor performance	Depending on disclosure; lacking awareness of political finance
Available Sanctions	Political, civil, criminal sanctions as prescribed in the law	Protest and withdraw support [from offending political forces]
Corrupt links between donations and favors	Hard to prove causal link	Reasonable doubt suffices for withdrawal of political support

This guide was developed by and in close cooperation with people who have worked directly with the monitoring of campaign finance. Therefore, much of what follows is not taken from written reports or published documents, but directly from the minds of those with first-hand experience in monitoring campaign finance.

Developing a monitoring methodology in eight steps

Focus of this chapter: Explain the process of developing a CFM methodology. That is, what needs to be decided and in and what order. Introduce the eight steps for developing a methodology and explain how these steps are used to as the structure of this Guide.

Content of this chapter:

*   The 8-step approach to developing a CFM methodology
*   A word on terminology

The eight steps for developing a monitoring methodology, and an outline of this Guide

Setting up a project to monitor campaign finance involves a long series of decisions, which, oftentimes, are intertwined with one another. To ensure you end up with a sound methodology, it is therefore essential that you first identify the goals you wish to achieve and then take relevant decisions regarding key issues in the right order. This rule of thumb applies whether you are planning a minor add-on to an existing election observation project, or a multi-year initiative focused exclusively on campaign finance monitoring.

Over several decades of partnership with CSOs around the world on campaign finance monitoring, IFES has developed an eight-step approach to developing a CFM methodology that has been field tested by CSOs in Afghanistan, Georgia, Libya, Nepal, Nigeria, Serbia, Tunisia, Ukraine and Zimbabwe. Whatever the ultimate objective of a campaign finance monitoring exercise, it is important to establish your monitoring approach before you start. If this is not done, there is significant risk that you end up carrying out certain actions because they seem like a good idea, and you react to things as they come up, without having a coherent plan in place ahead of time. This guide is developed based on these eight steps.

The **first step** is to identify the long-term goals – that is, what role you want money to play in the electoral campaign process. The **second step** is to determine what main problems are keeping the country from reaching these long-term goals, and which ones you want the monitoring to focus on. These can include abuse of state resources, vote buying, excessive spending or over-reliance on a small number of donors.

The **third step** is to decide which outcomes of your monitoring would help address the main problems you have identified in a way that would contribute to your long-term goal(s). This can include legal change, increased awareness among voters or behavior change amongst politicians or business interests.

Deciding your long-term goals first, then identifying the campaign finance problems which need addressing, and lastly pinpointing desired outcomes makes it easier to ensure consistency in your monitoring methodology. Admittedly, the close connection between these issues means that you may often end up considering them in parallel.

Once the problems have been identified and how to solve them in the medium to long term, the **fourth step** is to decide on the monitoring approach in such a way that it contributes to addressing the identified problems, leading to the desired outcome and contributing to the long-term goals. There are a lot of things to consider in deciding on your monitoring approach, and the chapter on this step covers many areas, including how to monitor campaign spending and income, abuse of state resources, vote buying, hidden advertising, the activities of the political finance oversight institution(s) and the interplay between gender and campaign finance.

It is essential to establish what the project will cover, but also what it will not cover. Delimiting the scope and specifics of the project make up the **fifth step** in developing a monitoring methodology. In this step, you will decide which areas of the country should be covered, which parties or candidates followed, and the timespan of the monitoring. Naturally, what you can cover will depend on the available resources, but it is important that your delimitation decisions be based on your decisions regarding the preceding steps.

The **sixth step** addresses how the information coming out of the CFM project can be used to contribute to the desired outcomes and long-term goals. The output of the project may be a traditional post-election report, but it can also include Facebook pages, Twitter feeds, Instagram posts and other platforms to reach the target audience of the project.

Like all types of projects, especially those involving more than one person, project management is a critical issue. Deciding how to manage the CFM project is the **seventh step** in developing a CFM methodology, including who should do what, budgeting, communication issues and security concerns.

Just like guards need guarding, monitoring needs to be monitored. **The eighth and last step** is to decide how organizations can control the quality of CFM and protect against accusations of bias, which are a common response from political stakeholders. How to monitor and evaluate your monitoring efforts, and how to learn from the evaluation results, is therefore the eighth and ultimate step of developing a CFM methodology.

Towards the end of this guide you will find a summary of the recommendations discussed throughout the text, and some final words from people with personal experience monitoring the use of money in politics and electoral processes.

There is a *quicklist* regarding these eight steps in the appendices to this guide. This quicklist can be used by any group developing a monitoring methodology, and it includes succinct practical advice for each step. The appendices also include a list of resources to review, sample checklists as well as a list of abbreviations, a glossary and an index.

FIGURE 4. EIGHT STEPS TO DEVELOPING A CFM METHODOLOGY

1. Define long-term goal(s)
2. Determine the desired outcome
3. Identify the campaign finance problems to address
4. Decide on monitoring approaches
5. Set delimitations for monitoring
6. Identify project outputs
7. Plan for effective project management
8. Develop mechanisms for monitoring and evaluation

A word on terminology

The terminology involved in these discussions can be a little confusing. Figure 5 is intended to bring some clarity to the matter. *Inputs* are the different types of data points collected as part of the CFM project. These data points can include information on spending collected by Field Monitors, ties between politicians and business interests uncovered by investigative journalists or survey results which measure people's attitude to vote buying. By *output* we mean how these data points and information (the inputs) are practically used. For example, to raise public awareness via a final report or social media campaign, or to conduct an evidence-based lobbying or advocacy campaign to persuade parliament to make necessary legal changes.

FIGURE 5. INPUT, OUTPUT, OUTCOME, GOAL – ON TERMINOLOGY

INPUT

The different types of data collected and analyzed as part of the CFM project

Examples: Information on amounts spent on campaign, instances of abuse of state resources

OUTPUT

How the collected data is presented to the target audience(s)

Examples: Blog posts, Facebook postings, press releases, reports

OUTCOME

Desired changes that will hopefully result from the CFM project

Examples: Raised public awareness, amendet laws, altered behavior by key actors

LONG-TERM GOAL

Long-term objectives induced by the desired outcomes

Examples: Absence of corruption in politics, accountability by elected leaders

Outcomes are the desired changes that we hope to see as a result of both the inputs and outputs of a CFM project. The outcomes should be measurable so that it is possible to measure the success of the project, though desired outcomes may not come to be immediately. In the real world, changes to legislation may take several years. What is more, this timeframe is sometimes desirable in that it ensures protection of the Rule of Law and that the legal changes are indeed the right ones. At least in some cases, it may be reasonable to aim for the desired outcomes happening before the next round of the type of elections being monitored (presidential, parliamentary and so on). Even if it may take time before an outcome is achieved, they should be monitorable and should be defined as such.

It may take even longer to reach the *goal or goals* of the CFM project, which are the long-term objectives based on a series of outcomes. Where we have seen changes regarding a corrupting role of money in politics it has often taken decades, and the same frequently goes for larger scale increases in transparency. Because of this long timeframe, the goals should mainly be used to guide the CFM methodology, not to measure the project's success. It may also be exceedingly difficult to measure goals.

Step 1. Define the long-term goals

Focus of this chapter: Deciding your long-term goals regarding money in the electoral process – and conceptualizing what the ideal situation for your context would be.

Content of this chapter:

- What we mean by "long-term goals," and why deciding on them matters
- Examples of long-term goals

Monitoring of campaign finance can be done for a variety of reasons and in pursuit of various goals. If monitoring is to be useful, it is important to be explicit about what these goals are. Hence, the first step in developing a methodology for CFM is to consider why you are doing it, or more precisely, what longer-term situation do you hope to see regarding the role of money in politics (and in particular in elections) for the country being monitored.

No single CFM project is likely to bring about these higher-level, long-term goals. Arriving at this point requires extensive action from a myriad of people and entities including citizens, civil society players, the media, public institutions and business and political players. However, before developing a detailed plan for campaign finance monitoring, it is important to identify the long-term goals to which your project should contribute. These goals will help determine the activities which should be carried out.

For example, if the identified long-term goal is increased transparency, it makes sense to focus on the accuracy of ongoing financial reporting and the activities of the political finance oversight institution. If instead the goal is decreased political corruption or accountability from politicians, it may make more sense to focus the monitoring on vote buying or abuse of state resources. If ensuring that the electoral process is free of foreign interference, focusing on campaign income or on spending by non-contestants ("third parties") might be called for. Some common long-term goals are shown in Figure 6.

FIGURE 6. EXAMPLES OF LONG-TERM GOALS OF CFM PROJECTS

Full transparency in political fundraising and spending

Integrity of the state administration without resources being used for political benefits

Equal opportunities for political actors without access to money to make their voices heard

Absence of corruption or influence of wealthy interests in political decision-making

National sovereignty of the electoral process free of foreign interference

No goal is more important than another de facto. Your general view of how the political and electoral process should function will determine which goals you wish your CFM monitoring project to contribute to. This can vary, for example, depending on political culture. For example, the general view of the role political parties should play in the political and electoral process is vastly different in the U.S. compared to Scandinavia, but both views are equally valid.

Naturally, you may well come up with multiple long-term goals. This is understandable given the complex nature of democracy and the political process. Be careful not to identify too many long-term goals though, as this may dilute your monitoring efforts, and make it more difficult to identify a logical connection between your long-term goal and the CFM you are carrying out.

Once you have identified the long-term goals that your project wishes to contribute to, the next step is to consider what current campaign finance problems are hindering the achievement of these goals. This is the focus of the next chapter.

Step 2. Identify the campaign finance problems to address

Focus of this chapter: Campaign finance challenges in different countries and why the next step after identifying the CFM project's long-term goals should be to consider what campaign finance challenges the project should address.

Content of this chapter:

- Different campaign finance problems
- Why identifying campaign finance problems is essential

Political party and campaign finance are not inherently problems to be solved. Money is necessary for democratic election campaigns, wherein contestants can explain their political program to the electorate and hear from the voters how they want their country to be governed. The right to stand for elected office is a fundamental part of the democratic process. One of the implications of this is that those running must be allowed to use resources to further their candidacy.

FIGURE 7. COMMON CFM FOCUS

Murky and illicit financing of election campaigns

- Abuse of state resources
- Vote buying
- Lack of compliance with regulations
- Influence by oligarchs or foreign actors
- Biased enforcement of regulations
- Lack of transparency in campaign income and spending

However, money in elections may lead to activities that corrupt elections and the wider democratic process. All countries have minor or major concerns regarding the role of money in politics, which stakeholders feel need to be addressed.[10]

All countries have at least some issues with campaign finance, but the exact problems vary from region to region, from country to country and sometimes within the same country over time (or between different parts of a single country). Some of the most common campaign finance problems which have been focused on in previous CFM projects are outlined in Figure 7 above. These problems vary from a lack of transparency in how political parties and candidates raise and spend money to the opaque involvement of non-contestants ("third parties") in campaigning, to potential foreign influence in the campaign process. While the level of vote buying varies greatly between regions and countries, the abuse of state resources for electoral gain is a problem that has proven to be particularly difficult to address in a wide range of countries.

Although all countries have at least some regulations for campaign finance in place, political actors can, in many countries, violate these rules with near-total impunity. The practical enforcement of regulations by political finance oversight institutions is limited in many countries, and in the worst case, they may be implemented in a biased manner targeting certain political forces. Even where the political finance oversight institution does actively monitor compliance with regulations, courts seldom impose sanctions in cases of serious violations.

The campaign finance problems a CFM project focuses on will depend on the long-term goals that have been established. Focusing on abuse of state resources may be particularly relevant if the project's main long-term goal is to contribute to the integrity of the state administration or the equal opportunity for political actors to participate in elections. If political finance transparency in elections is the main goal, it may be more relevant to focus on accuracy in financial reporting by political parties and candidates and compliance with campaign finance regulations. In practice, you are likely to go back and forth between long-term goals and which campaign finance problems to address before firmly deciding on each.

Unfortunately, many countries struggle with a wide range of campaign finance problems. Trying to address too many as part of one CFM project may however reduce your chances of effectively addressing any of them. To help identify the most important problems to focus on, you can use reports that you or other CSOs have written on political finance or elections in the past, as well as international election observation mission reports and similar documents.[11]

The design of the CFM project will be largely determined by which campaign finance problems the monitoring effort has decided to focus on. This includes the desired outcomes the project is aiming for, which is the topic of the next chapter.

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[10]   This is reflected in the fact that out of the 180 countries reviewed in the International IDEA database of political finance regulation, every single country had adopted at least some regulations on political finance issues. It seems unlikely that such regulations would be passed if there were no concerns regarding the role of money in the political process.

[11]   You can also draw on existing standards documents on political finance. These are unfortunately few and seldom detailed (cf. Article 7(3) in the United Nations Convention Against Corruption). One of the more detailed standards documents at a regional level is OSCE/ODIHR and Venice Commission (2020).

Step 3. Determine the desired outcomes

Focus of this chapter: Illustrate how the long-term goals and campaign finance problems to be addressed should determine the desired outcomes of a CFM project, and how these desired outcomes, in turn, should determine the CFM project's design.

Content of this chapter:

* What is meant by "desired outcomes" and how the term relates to developing a CFM methodology, both in the steps previously outlined and those subsequent
* Examples of desired outcomes in CFM projects

Once you have identified your long-term goals or the role that you want money to play in the electoral process in question, as well as the existing campaign finance problems that the project should address, you need to consider what changes may help remove these problems and further the achievement of these goals. We refer to these changes as "desired outcomes." The term does not refer to the activities or output of the actual project. Rather, it denotes the measurable actions you hope others will take following your monitoring. Some common desired outcomes are shown in Figure 8.

The desired outcome(s) that a CFM project should focus on depends on what was decided in the preceding two steps. If the long-term goal is full transparency in the raising and spending of money in election campaigns, and addressing the problem of political actors violating the rules with impunity, the desired outcome may be increased enforcement by the political finance oversight institution or behavioral change on behalf of the political actors in question, or a combination of both.

If the focus is more on the integrity of the state administration and the fact that legislation is not addressing many areas of abuse of state resources, a desired outcome may be legal reform that tightens the rules regarding such abuses.

Identifying the desired outcomes of the project will help you determine the activities that should be carried out. If you wish to increase public awareness concerning the role of money in politics, a legal analysis may be less valuable, while finding cases of how campaign finance violations influence ordinary people's everyday life could be far for pertinent (and is far too often overlooked). The collected data can be used for social media campaigns with clear messaging, or a report written in easy-to-understand language.

If, on the other hand, the main desired outcome is to inspire legal changes, the main focus of the monitoring should perhaps be on pinpointing gaps in the current legal framework, highlighting regulations that are unclear or that cannot be implemented. Or focusing on identifying behavior that, though in compliance with the formal provisions in existing

FIGURE 8. COMMON DESIRED OUTCOMES FOR CFM PROJECTS

INCREASED PUBLIC AWARENESS ABOUT THE ROLE OF MONEY IN POLITICS

Focus groups before and after elections show that people think and know more about the issue

Surveys show an increased awareness about the issues

LEGAL AND REGULATORY REFORM

Draft legal changes are developed with input from the CFM results

The political finance oversight institution passes regulations on how laws should be interpreted

POLITICAL STAKEHOLDERS BEHAVIOUR CHANGE

Increased compliance with financial reporting requirements

Fewer credible reports about violations such as vote buying or over-spending

IMPROVED ENFORCEMENT OF CAMPAIGN FINANCE REGULATIONS

More proactive engagement by the political finance oversight institution(s)

Fewer credible reports about violations that are not formally investigated or that do not lead to sanctions

legislation, undermines the purpose of the legislation, or the democratic process itself. The collected data therefore would mainly be used to write a legally focused report and to lobby parliamentarians and legal professionals.[12]

The desired outcomes of a CFM project can be identified through a number of ways. Combining in-house discussion on this issue with the debate outside the organizations amongst stakeholders, for example, could be beneficial. Reviewing the experience and recommendations of others who have studied campaign finance in earlier elections can also be valuable.[13]

As you may decide on multiple long-term goals and campaign finance problems to address, you may also have multiple outcomes you would like to see from the monitoring project. Indeed, some outcomes may significantly increase the chances of other outcomes; increased awareness may increase the risk for legal reform, or increased regulation enforcement may lead to behavioral changes in political actors. As is the case with the preceding steps however, identifying a realistic and manageable number of desired outcomes is key to increase your project's chances of success. Partnering with another organization may allow you to focus on a smaller number of desired outcomes, as the other organization might be focused on different complementary outcomes. Together, the two may alleviate the identified campaign finance problem(s) and lead toward your long-term goal(s).

Once you have addressed these first three steps, the major task of deciding what to actually monitor and how to do so can begin. This can be daunting. This in mind, the experiences, lessons learned and tips on what to consider when deciding on monitoring approaches are all collected in the next chapter.

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[12]   For a discussion about different desired types of change in counteracting corruption, see also Transparency International (2015).
[13]   The type of Scoping Study discussed in the OSI 2005 handbook can also be useful in identifying the most relevant focus of a CFM initiative. OSI (2005) chapter 2.

Step 4. Decide on monitoring approaches

The next step is to decide *how* you are going to monitor campaign finance. Naturally, the most appropriate approaches will be determined by the decisions taken in the previous steps. For example, if you have identified abuse of state resources as the main campaign finance problem to address, you will want to focus your monitoring on that issue. There are many options and many issues to consider, which is why this chapter is significantly longer than any of the others in this guide. This chapter deals with how to monitor:

Campaign spending page 15	**Campaign income** page 37
Abuse of state resources page 42	**Vote buying** page 65

Hidden advertising page 70	**The work of the political finance oversight institution(s)** page 73	**Campaign finance and gender** page 76
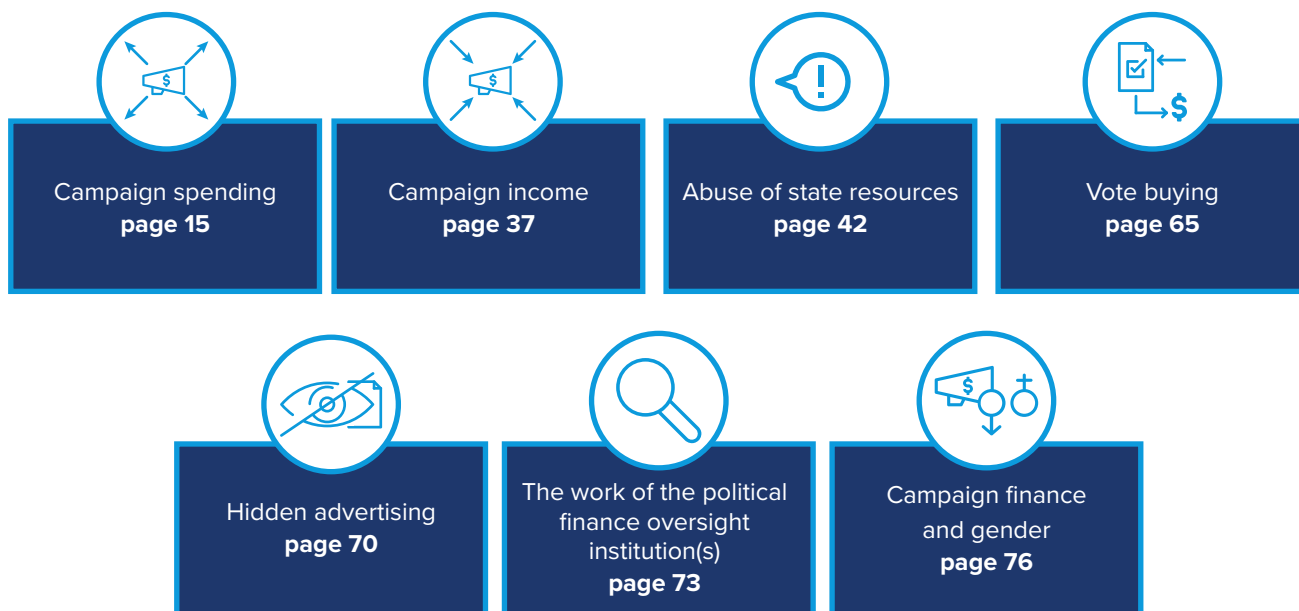
Monitoring campaign spending

What is campaign spending and why is it worth monitoring?

In every country where there are elections, political parties, candidates and other interested parties spend money and resources on election campaigns. Campaign spending is defined differently in different countries (and not at all in many) but can generally be taken to mean any spending aimed at supporting the electoral success of a particular party or candidate, or in securing the electoral defeat of a particular party or candidate. This can include anything from online advertising and refreshments during campaign rallies, to hiring a consultancy company to design the campaign or buying anti-virus software to protect the computers used in a campaign from cyber-attacks.

Campaign spending is the most common focus of CFM projects around the world. There are many reasons why campaign spending is worth monitoring. The ones most frequently cited are shown in Table 3 below. Determining which of these reasons is the most relevant for any individual CFM project will depend on the previously identified long-term goals and desired outcomes (see previous chapters).

TABLE 3. REASONS FOR MONITORING CAMPAIGN SPENDING

Reason	Comment
To provide information about the level of campaign spending	This information can be very valuable for informing discussions about campaign finance in a country, especially where official financial reports are not submitted, not made public or are not credible. It is especially important to provide evidence-based information when arguing that the overall level of spending on election campaigns is higher than what is deemed acceptable given the country's economic situation or poverty levels.
To explore variations in campaign spending between different parties and candidates	To this end, monitoring campaign finance is directly relevant for discussions on how level the electoral playing field is. This also has an impact on which contestant will be monitored. Low levels of monitored spending by contestants may also be related to the use of state resources (in some cases, low levels of spending by incumbent parties may be combined with often illicit or illegal spending by public institutions). The difference in female and male candidates' spending may also be a key focus for monitoring.
To monitor what forms of campaigning contestants spend most money on	Apart from shedding light on the campaign finance situation within a country, this can be essential for discussions on how to reduce campaign spending, where this is considered desirable (such as restrictions on money spent on advertising to achieve a certain goal, such as a more level playing field). This type of monitoring may also inform discussions if current campaigning practices invite effective communication with the electorate – especially in the case of an electorate which, through election campaigns, is able to voice its concerns and preferences to the competing political parties and candidates.
To study whether contestants comply with existing spending regulations/limits set by legislation	This is useful for studying the effectiveness and impact of existing campaign finance regulations. The opportunities to judge this will partly depend on the type of election being monitored and the reporting required (monitoring a local government candidate's election compliance is much easier than a presidential candidate's, if in the latter case the spending limit is expressed nationally). It may, for example, be concluded that all major political parties exceed the spending limit, or that the limits are never reached by any political party.

Reason	Comment
To analyze the accuracy of financial reports and effectiveness of oversight	This is another way of studying compliance through regulations and the effectiveness of enforcement. The chances of comparing analyzed spending with officially submitted reports will depend largely on the formal reporting requirements and the actual reporting practices of contestants, as is discussed further into this chapter. This can also include monitoring the oversight of political finance oversight institutions, see page 73.

Parallel Expense Tracking – a formalized approach to monitoring campaign spending

Parallel Expense Tracking (PET), developed by IFES in partnership with partner CSOs around the world, is one methodology which monitors campaign spending. Drawing on work carried out around the world since the 1990s, PET has been used successfully in different countries in various ways. It has been used, for example, in Afghanistan in 2010, in Serbia (2012), in Ukraine (2012 and 2015), in Tunisia (2014), in Georgia (2014, 2016, 2018, 2020 and 2021), in Nepal (2017) and in Nigeria (2018, 2019 and 2020.)

Within the PET methodology, external actors (normally civil society organizations) gather information about the electoral spending of political parties and/or candidates, independently of the financial reports that these actors may submit to a political finance oversight institution. Simply put, the methodology is achieved by multiplying observed campaign activities (adverts, posters, rallies) with the estimated costs for such activities. This information can then be compared with submitted financial reports, somewhat similar to how the results from Parallel Vote Tabulation operations are compared to official election results.[14]

Nowadays, most countries require political parties and/or candidates in elections to submit reports about their finances. However, the accuracy of these reports is not subject to in-depth controls in most countries. By independently monitoring the expenses of political parties and candidates, you can learn more about how much is being spent and how funds are being used by contestants.

While PET is used for a whole range of purposes, they can largely be divided into two main categories:

Compliance
Determining whether political parties and candidates are observing national rules concerning campaign finance. The rules most commonly in play are financial reporting requirements and spending limits. In this case, the PET analysis aims to establish whether the contestants are submitting accurate reports, and if they have exceeded any existing spending limits. Assuming that submitted financial reports are publicly available for analysis, PET methodology can provide compelling evidence that cannot be matched by other types of monitoring or research.

Expenditure levels
Determining how much money contestants spend (and on what). PET projects may focus on the more general goal of establishing how much money contestants spend, and what they spend their campaign money on too This approach is also possible in countries where there are no reporting requirements or spending limits, though, as discussed below, it can be very difficult to establish exactly how much money is being spent. Nonetheless, credible estimates can often be provided about the contestants' spending in key categories.

With proper execution, PET can serve as a powerful tool to build awareness about campaign finance and its risks, to

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[14]   As PET always uses samples and partial information, it can most accurately be compared with the Quick Count approach during vote counting and collation.

call for legal reform and to advocate for more effective implementation of existing rules and the sanctioning of violators, and to promote behavior change among political actors. PET can provide necessary, credible information in an area where opinions and rumors tend to dominate.

Put simply, PET is a system whereby the number of monitored items in a particular expense category is multiplied by the unit cost estimate for that expense category (this can be an average, or the cost category may be broken down further, for example, by type of billboard or the size of online ads).

Mathematically, PET is simply this:

A practical example of establishing spending costs through PET is:

These calculations result in an estimated value of the monitored units of campaign materials and activities. Unless a CFM project covers all spending by all contestants at all times (which is not generally recommended, see page 93), the monitored data will need to be *extrapolated* to arrive at an estimate of the total spending. For more information on extrapolation, see page 35.

As useful as PET is, there are certain things that this methodology cannot assist with. Knowing its limitations is important to decide whether it is a suitable approach for specific cases. Note that many of the goals below can be achieved by including other monitoring activities to PET in multipurpose projects (for example, long-term observers can monitor abuse of state resources in a systematic manner using methodologies developed by IFES and other organizations over the last few years).[15]

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[15]   See IFES (2018) and page 42 of this handbook.

TABLE 4. WHAT THE PET METHODOLOGY CANNOT DO

What PET cannot do	Why not?
Provide information about where political parties and candidates get their money	As its name implies, PET focuses on *spending*. While information about income may come up during a PET project, this is not part of the design, and the information is unlikely to be systematic. Of course, if PET shows that a contestant has spent much more than the contestant reported to have received, it is interesting to ask where that extra money came from.
Give exact data on total expenditure (by a particular contestant or by all contestants)	PET can only provide *estimates* of spending in selected categories and geographical areas. Extrapolation estimates can be made about total spending, but they will always be estimates. By being open about this fact and moderate in extrapolations, the case can be made that the figures presented in a PET project are *minimum* expense estimates, and that the actual spending is likely higher.
Provide conclusive evidence for use in prosecutions and other electoral court cases	PET is a methodology developed by civil society groups as part of advocacy and awareness building efforts. As the methodology is based on selections and estimates, it is not designed to provide "hard evidence" of the type normally required by a court of law, although it can produce compelling supporting evidence. While it is possible to design PET projects to serve such a purpose, this issue is not addressed further in this guide.[16]
Prove if political parties have used public funding in line with existing regulations	PET focuses on quantities spent on election campaigning, not on how private or public funds are used. For example, if a television advert is monitored, the cost of that advert can be established, but additional information is needed to establish if private or public funds were used. PET can, however, provide valuable information for an analysis of the appropriate use of public funding.
Provide systematic information about abuse of state resources or vote buying	A PET project can certainly provide information about state resources being abused and about vote buying. However, this is not the purpose of the methodology, and if an organization wishes to monitor these issues systematically, they should use other approaches outlined in this guide (these approaches can be combined with PET in multi-purpose projects).

Preconditions and key considerations for implementing a PET project

There are certain situations where implementing PET methodology may be difficult, or where particular care is needed in the design or implementation of a PET project:

- The **security situation** in the country should allow for Field Monitors to gather information without taking undue risks (where risks are very high, at least monitoring spending on advertising should still be possible). See more about project security on page 106.

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[16] As part of several PET projects that have been implemented, stakeholders have requested that the monitoring CSO hands over its data to the oversight body as part of a formal complaint, for example in Tunisia in 2014/2015. However, in such cases the monitoring organization must make clear that PET is intended to gather parallel information about campaign spending; it is not intended to provide data to be used in court cases.

- It is difficult to compare monitored results with officially submitted financial reports unless there is a requirement to include **in-kind contributions** (such as discounts on advertisements) in such reports. The reason is that the contestant in question can argue that any discrepancy between monitored and reported expenses is due to discounts or free provisions for campaigning advertisements, materials or other campaign costs. Where in-kind contributions must be reported however, the monitored spending should match the combined reported spending and reported in-kind contributions.

- PET can be difficult **where campaign spending is dominated by non-contestants or third parties,** rather than by political parties or candidates themselves, and where it is not clear which actor is producing campaign materials and organizing events (in some countries, parties or candidates may set up formally independent CSOs or charities to bypass disclosure regulations or spending limits). However, campaign dominance by third parties is still rare (PET is perfectly possible if non-contestant/third party spending exists at a limited level). If non-contestants are required to report their spending and do so in sufficient detail, it is also possible to separate what spending was incurred by a contestant and what was incurred by non-contestants supporting a contestant.

- **Where the government party or parties illegitimately rely on state (administrative) resources for their campaigns**, PET may give a skewed image of spending, unless special methods are devised to assign monetary value to the state resources being abused. Having said that, in most countries some level of abuse of state resources exists and as long as the project team is aware of potential problems, this should not prove to be an insurmountable obstacle. See page 42 for further information.

- In countries **where financial reporting requirements do not exist or are regularly ignored**, it is difficult to use PET for comparing actual spending behavior with formal regulations. There is no international consensus on what constitutes a reasonable level of campaign spending or details in reporting, and while the United Nations Convention Against Corruption (UNCAC) calls on all countries to introduce rules for transparency in election campaigns, this is not a binding commitment for UNCAC signatory states.[17] However, also in countries of this type, PET can provide valuable information about the *actual* spending patterns of political parties and candidates and can be an important tool in calling for the introduction of regulations on this issue, and for adherence to UNCAC. In addition, where there are no spending limits, it is of course impossible to monitor compliance with such regulations.

- In the very few countries **where private fundraising and spending is banned**, it is, for logical reasons, exceedingly difficult to employ PET (contestants will strive to hide all spending from private sources since it is technically illegal). Regulations of this kind almost only exist in countries where the freedom of CSOs is severely limited, and where monitoring may also be difficult or indeed dangerous for other reasons.

- **The type of election being monitored** is also of significant. The most suitable conditions are in single-member-district (SMD) systems (where each constituency elects one Member of Parliament, local councilor or similar).[18] This means that campaigning is contained to a smaller area, and it is easier to judge who is paying for the campaigning. Proportional representation elections can also be monitored, but the larger the constituencies are, the more challenging monitoring becomes. If the proportional system is based on open lists, it may be necessary to monitor and separate spending by political parties and by individual candidates from the same list competing against each other. Presidential elections can be monitored but since the entire country is normally the constituency (and financial reporting is seldom broken down at the local level), it is more difficult to draw conclusions from the monitored information. The most challenging type of election to monitor are parallel elections, where, for example, SMDs are elected at the same time as larger proportional constituencies. In such cases, it is often very difficult to judge what expenses pertain to each election campaign.[19] By-elections are often the easiest to monitor, since the

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[17]   United Nations (2005) Article 7.3.
[18]   Note though that monitored spending can only be easily compared with reported spending in cases where the formal reporting is done at constituency level.
[19]   However, this does not mean that it cannot be done, if the conditions are right. The 2012 monitoring project in Ukraine carried out by OPORA was done in the most difficult electoral conditions: parallel SMD and larger-list constituencies. However, since a regulation was in place that all campaign materials has to list the name of who paid for it, it was decided to only monitor spending listed as "paid for" by selected SMD candidates. This meant that some campaigning that these candidates benefitted from could not be considered (nationwide campaigning by their political party). However, this was deemed an acceptable delimitation, especially since the SMD candidates were required to submit their own financial reports, which the monitored data could be compared against.

competition is limited to one particular area, with no other election campaigns going on at the same time. However, it's important to remember that by-elections are often different from general elections. For example, political parties may place extra importance on winning them to show the support of the party in between general elections. Care is therefore needed in drawing conclusions about overall campaign spending from monitored information on spending in by-elections.

This may seem like a long list of preconditions, but when the particular context of a country is carefully considered, PET projects (of some kind) are possible in most countries.

Formal campaign finance regulations that may impact PET

Apart from the existence or non-existence of reporting requirements and spending limits discussed above, there are certain formal regulations that may particularly impact a PET project. That said, a review of the legal situation should be carried out before the project design is developed. The types of regulations in Table 5 are particularly important (note that while the existence of some make implementation of PET more difficult, others will facilitate PET in that they provide important data). In most cases, PET is still possible regardless of whether the regulations below exist.

TABLE 5. CAMPAIGN FINANCE REGULATIONS THAT MAY HAVE AN IMPACT ON PET

Formal rule	Why it matters
Requirement for all campaign materials to include the name of the payer	Rules of this kind (if implemented) are of great use for PET projects, since they facilitate the identification of who has paid for a particular advertisement, billboard or poster. Regulations of this kind exist, for example, in Mongolia, Ukraine and the U.S. In Ukraine, campaign posters must even note how many copies have been printed of the poster in question.
Requirements for actors other than political parties and candidates to submit financial reports.	In some countries, media outlets that sell advertising to political parties or candidates have to submit separate reports to the political finance oversight institution. If such reports are publicly available, they can provide valuable information regarding media advertising expenses.
Regulations on non-contestant (third party) spending	The spending on campaigns by non-contestants may be very important, as it may be difficult to distinguish between their spending and that done directly by political parties or candidates. Where there are rules that such spending must be reported to an oversight agency (such as in Ireland, Latvia or the U.S.) or that spending by such organizations must be included in the reports by contestants (such as in Lebanon and arguably in Nigeria), *and where such rules are implemente*d, a PET project will be easier to implement. A requirement for non-contestants to mark they have paid for campaign materials (see the first point above) is also helpful.
Ban on private advertising	Some countries ban particular expense categories outright. The main example (apart from vote buying) tends to be private advertising in TV, radio and/or printed media (less commonly in online media). In such cases, it can still be useful to monitor media since contestants may engage in hidden advertising, but that falls mainly outside the scope of the PET methodology.

Formal rule	Why it matters
Requirement for media outlets to charge the same prices for all contestants	In many countries media outlets directly or indirectly connected to a contestant may offer discounts on advertising. Some countries however ban such methods, forcing media outlets to charge all actors the same. This facilitates PET since the issue of discounts being in-kind donations will not arise (see further on page 27).
Requirements for media outlets to publicly declare their advertising charges in relation to election campaigns	Some countries also demand that media outlets make their advertising charges public before or at the beginning of an election campaign (this is sometimes combined with a ban on discounts, as discussed above). This is useful for PET since it provides direct information about (at least theoretical) advertising fees.
Limit on spending on certain media outlet	There are a few countries (not many) that limit how much an electoral contestant can spend on any individual media outlet. This rule is comparatively easy to monitor, but a potential disadvantage is that contestants may try to use third party organizations to get around such regulations, making monitoring more difficult.
Limit in particular expense categories	In some countries (such as Nepal) there is a limit on how much money a contestant may spend on particular expense categories. This is relatively easy to monitor in itself, but contestants may try to hide excessive spending, which can make things more complicated.
Limits on where campaign materials can be placed	Some countries require that campaign materials such as billboards, banners and posters only be placed in designated areas. If heeded, this makes monitoring of such materials easier (since monitors will not have to go looking for these material such as posters). However, it may also prompt parties and candidates to divert their funds to other, less restricted and less easily monitored forms of campaigning.

Deciding what expense categories to monitor

Before starting any PET project, the expense categories that should be monitored must be decided (for example, online advertising, campaign rallies and billboards). Unless the monitoring organization has nearly endless resources available, no PET project should try to cover all expense categories. Doing so would most likely result in the project failing to yield any reliable information at all (it is better to carry out more targeted monitoring well than to attempt more ambitious monitoring haphazardly).

Therefore, key expense categories should be selected for the monitoring effort. Which ones to choose will vary by country. It is important to carefully consider this issue in advance to ensure the information collected supports the ultimate goal of the monitoring project.

Main expense categories
There are many things that political parties and candidates may spend money on. However, all or some of these tend to be the most important and should be considered for PET projects (in line with the criteria discussed above).

TABLE 6. MONITORING COMMON TYPES OF CAMPAIGN SPENDING

Common expense category	Comment	How to monitor
Television and radio advertising[20]	This is the first category that should be considered. In many countries, political parties and candidates spend the bulk of their money on television and radio advertising. In a PET project, there is no point in monitoring broadcasts that are unlikely to be used for advertising purposes, since the point is to cover as much of the advertising as possible. Ideally, the selection should include stations preferred by both the government and opposition side (if, for example, only pro-government media is included, the risk is that advertising by opposition contestants will be missed). State media can be included if they accept paid advertising from contestants. In some cases, organizations have attempted to evaluate the cost of hidden advertising (broadcasts that are not official advertisements but that report in favor (or against) a particular political party or candidate. Such monitoring is useful in trying to establish if the stakeholders are following the rules (hidden advertising is forbidden in many countries). From the perspective of PET, it is less clear if such activities should be monitored, since it is difficult to credibly establish the extent of their support or opposition and, in particular, the expense of such irregular media activities. Where media organizations are close to a particular party, they may provide hidden advertising for free or at a subsidized cost, but unlike regular discounts given by media outlets, due to its dubious legality, hidden advertising often falls outside political parties' required financial reporting.[21] See page 70 for further detail.	Dedicated media monitors or information from media monitoring companies or other projects monitoring advertising
Online advertising	An increasingly common form of campaign spending; one of great interest to many CSOs but also one many have found difficult to reliably monitor. The situation regarding the availability of online advertising spending data is changing quickly and varies significantly between countries. See page 13 for further detail.	Online tools such as the Facebook Ad Library or dedicated monitors.
Advertising in printed media	This relates to advertising in newspapers, journals, and other printed media outlets. However, the monitoring approach is normally vastly different from TV and radio monitoring. Like in television and radio monitoring, the media selection should include both publications close to the government and ones on the opposition's side. (If the political scene is more diversified, monitoring should attempt to cover all major camps included.)	Dedicated media monitors (not a time-consuming task).

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[20] Monitoring broadcast advertising is becoming increasingly easy in many countries with the expansion of technology, from cable TV to online portals that broadcast TV and offer "rewind" tools.
[21] For example, if a broadcasting company or television station provides a political party with advertising worth one million for free, the party normally has to report this to the political finance oversight institution as an in-kind donation, but hidden advertising often has no explicit value (as it is illegal in many countries) and is seldom explicitly included in the financial report requirements. For more information about dealing with discounts in PET, see page 27.

Common expense category	Comment	How to monitor
Billboards	Contestants may either use pre-existing billboards (normally used for commercial advertising) or, in some countries, erect billboards specifically for campaign purposes. It is sometimes possible to get information about the number of billboards through local government. See the sample Checklist 3 in this guide on page 131.	Field monitors and/or crowdsourcing.
Banners and posters	Banners and posters are common campaign materials, but as they are comparatively cheap, they may not constitute significant expense categories. If you wish to monitor the use of posters in your CFM project, you can draw inspiration from sample Checklist 4 in this guide, (see page 132.)	Field monitors and/or crowdsourcing.
Campaign events	Events such as rallies, concerts and town hall meetings are commonly used in some countries, but hardly at all in others. While in some rallies are ad hoc events, in others they may occur regularly, for example, on market days. Events of this type are fairly easy to identify due to their (normally) public nature, though estimating the costs involved can be more difficult. It can be difficult to distinguish between events organized by a political party and those organized by public institutions, in particular where the distinction between the government and the government party has become blurred. Some CSOs have also found it difficult to find relevant information about campaign events ahead of time. Door-to-door campaigning can be included in this category or under its own heading. It should be noted that such campaigning need not be especially expensive and might be comparatively difficult to monitor. See Sample Checklist 1 on page 126.	Field monitors, possibly crowdsourcing.
Administrative expenses	This will include the use of personnel in campaigns, logistics, polling and other related activities. Personnel will always carry some costs, even if volunteers are used (these normally require some logistics and refreshments). Administrative expenses also include office costs and similar for the campaign, and in many cases, it is difficult to separate from the ongoing expenses of running a political party. In relation to the government party/parties, it can be even more difficult to separate campaign expenses incurred by the party from costs covered by public entities. *In general, it is often difficult to estimate administrative expenses, and it is fairly common that this category be excluded from monitoring.*	Field monitors

Criteria when deciding on expense categories to monitor

Consider at least the following four criteria when deciding which expense categories to include:

The share of total spending that selected contestants are expected to spend on the category

The first and main consideration is how much of total spending will go to a certain category. If contestants, for example, do not spend significant amounts on election posters, it makes little sense to monitor posters. If, on the other hand, it is estimated that contestants will spend most of their money on television advertising, there must be very compelling reasons for *not* including television advertising in the monitoring effort.

The possibility of getting information about activities within each expense category

Relative spending is not the only consideration; the relative frequency of different expense categories must also be taken into account. Vote buying is often a major category of expenditure, but one that it is frequently particularly difficult to monitor. Another is election posters – also in countries where contestants spend a lot of money on posters, which, if a PET project has limited resources, may be excluded from monitoring given how difficult it is to do so (political actors may frequently tear down posters put up by competitors, or post their own posters on top of existing ones). On the other hand, spending on advertisement in printed media is quite easy to monitor and unless it is considered completely negligible in terms of campaign spending, it makes sense to include it. A particular concern relates to spending on online advertising – see further on page 28.

The possibility of establishing credible spending data related to each expense category

Related to the abovementioned is the consideration of how easy it is to establish not how much a certain expense category is used, but how much money is spent on said category. For example, while it can be exceedingly difficult to count the number of posters printed by a political party, it is often fairly easy to establish a cost estimate for the production of each type of poster.

On the other hand, counting the number of small rallies held by a political party may be comparatively easy, but estimating the cost for each one can be exceedingly difficult (as it would include assessing variables such as the amount of money spent on logistics, PA-systems, facilities rental, catering and so on). Such expenses may also be included in various places in official spending reports submitted by contestants to a public oversight institution, making comparisons with monitored information exceedingly difficult (if the monitoring is intended to include such comparisons).

Monitoring efforts by others

Monitoring of campaign spending is fairly rare in most countries, but where multiple efforts do exist, it is important to consider what is being monitored by each effort. For example, if spending on online campaigning is monitored by another reputable organization, it may be preferable to seek cooperation and data-sharing with that organization while your organization focuses on monitoring something else, ensuring complementarity instead of overlap. Check carefully though if other organizations are indeed monitoring spending on particular campaign efforts. Monitoring of online hate speech during campaigns, or of the coverage and tone of coverage, is not useful for ascertaining spending levels – if others' monitoring does not establish spending on advertising, complementarity or overlap will not exist.[22]

Establishing estimated unit costs for various expense activities

PET is the multiplication of observed election campaign activities by estimated unit costs for such activities. The second part of this equation is fundamental, since mistakes will mean that the estimated expenses are inaccurate, no matter how diligent the project and its monitors have been in establishing how many activities have been carried out in campaigning by monitored contestants. Unit cost estimates should be as detailed as possible to allow for maximum accuracy in estimated expenditure, though it will normally be necessary to use estimated averages for similar units.

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[22] Monitoring coverage and tone in publicly controlled media can be an important part of establishing whether state resources have been abused. See page 58 and page 59.

Sources for information about unit costs

It is necessary to establish unit cost estimates for all relevant types of expenses that are going to be monitored as part of the project, such as 30-second advertisements during prime time on a particular television station, a billboard posted on a commercial billboard holder for a week, or the use of a public announcement system during a campaign rally.

There are several methods for establishing the unit costs for different types of expenses. The main ones are:

Use information from previously submitted financial reports

Information in reports previously submitted by contestants or by other actors involved in campaigning can provide vital information. However, in many cases the reported information will not be sufficiently detailed to allow for estimation of unit costs. There is also the question of the reliability of these reports. In general, this should not be the first choice for estimating unit costs.

Request information from vendors engaged in campaign activities

The most straightforward approach may be to request relevant information from vendors (such as advertising agencies, printing houses and venue rental institutions), explaining the purpose of the project and the request. These actors can provide relevant data, but note that vendors engaged in campaign activities know that their clients may not want their spending to be public knowledge, making them unwilling to cooperate.

Express interest in purchasing items or services yourself

Yet another approach used in some projects has been to contact media outlets, printing houses etc. to collect quotes for the type of activities that you are intending to monitor, expressing interest in purchasing these items yourself.[23] Naturally, you need to make sure that you do not make any commitments to purchase anything, and that this approach does not risk the safety of the persons involved. For further information about security considerations, see page 106.

Establishing accurate unit cost estimates for selected expense categories

Accurate estimates of television and radio advertisement unit costs

Naturally, a longer advertisement on television will tend to cost more than a shorter one, but there are often a lot of other factors to consider which are normally related to expected viewing/listening figures or the quantity of airtime purchased. While it may not be possible to establish unit cost estimates that exactly match the actual spending, you should try and make them as accurate as possible.

Some of the most common factors to consider are:

- Length of the advert
- Day of the week
- Time
- Channel
- Program / show
- Number of times the advertisement is aired

Overall spending by the contestant on advertising in relation to the channel (or media company)
Note that other factors may impact the cost as well; for example, an advertisement during the World Cup Football final is likely to be especially expensive.

If you decide to monitor spending on mass media, a media or advertising professional should be contacted to provide advice on unit costs for these expense categories.

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23   It could be argued that this approach has some ethical downsides (it does involve being slightly liberal with the truth), but in cases where vendors may otherwise refuse to provide the necessary information, it may be the only way forward.

Accurate estimates of online advertisement unit costs

Spending on online advertising is increasing rapidly in many countries. A 2020 CFM project in Montenegro found that official reports indicated a tenfold increase in spending on social media advertising compared to the elections held four years earlier.[24]

The starting point for estimating spending on online advertising is establishing what constitutes a campaign advert. Election contestants might only be required to report advertising that constitutes as campaign advertising, and political parties may, for example, make the argument that a certain advert constitutes a regular party expense, and therefore need not be reported in campaign finance reports. This situation is complicated in many countries by a lack of clear regulations on what constitutes a campaign expense, in particular relating to adverts.[25]

There are many factors that can impact the unit cost of an online advert, including size of the advert, how often it appears on a certain page, placement of the advert relating to items of major interest (such as sport events). Unlike for other forms of advertising, the cost for online advertising may also be directly related to the impact of the advert itself. For example, the cost an advertiser has to pay could be connected to the advert click through rate (the share of people viewing an ad who then click on it). This means that it can often be exceedingly difficult to monitor spending on online advertising using the tools available for monitoring other forms of advertising. See page 28 for further information.

Accurate estimates of print advertisement unit costs

Numerous factors also determine the cost of advertisements in printed media (newspapers, magazines and journals). Some variables to consider when establishing unit cost estimates are:

- Size of the advert
- Type of advert, including use of color, inserts etc.
- Day of the week (for daily publications)
- Placement (front and back page, for example, are more expensive, and certain sections are less expensive)
- Number of times the advertisement is repeated

Overall spending by the contestant on advertising in relation to the printed media (or media company) Advertisements in color normally cost more than those in black and white too. Some contestants may also use special supplements or similar content, which may have different costs. In creating a checklist for recording advertising in printed media, you can draw inspiration from sample checklist 6 in this guide (see page 134).

Taking discounts into account

Discounts need to be considered carefully when making unit cost estimates, as the resulting expense estimates may otherwise be wildly inaccurate. There are two types of discounts. The first are regular discounts available to all buyers who reach a certain quantity in purchasing, for example. As much information as possible about such discounts should be included to allow for more accurate spending estimates when you are estimating the unit cost for a particular type of spending. There are many variants of this type of discounts which can vary depending on how far ahead the buyer contacts the vendor, loyalty discounts, etc. Keep in mind that vendors may also hike up their prices for all buyers – they often increase their prices (sometimes significantly) during election campaigns periods. This means that any cost estimates received before the campaign starts may be inaccurate, and that campaign period estimates are preferable.

The second type of discount is favors one particular client over another, even when their situation is otherwise the same. For example, when a media outlet gives a certain political party airtime for advertising at a lower rate but denies the same discount to other contestants. This approach is banned in some countries.

Where such discounts are allowed, they should *not* be considered in establishing the unit cost *in case* officially submitted financial reports are also required to include in-kind donations. This means that the monitoring should estimate the cost as if no discount was given, and this will then be compared with the sum of the reported spending and in-kind

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[24]   MANS (2020) page 56. Admittedly, this spending amounted to less than 20% on what was spent on television advertising.
[25]   For additional considerations on drafting detailed spending disclosure requirements that capture online advertising expenditures, see Countering Disinformation (2021).

donations for the particular spending. If correctly reported by the political party or candidate (and correctly monitored by the CSO), you should find that the monitored expense is equal to the reported spending and the reported in-kind donation together. For example, if PET monitoring estimates that a concert organized by a political party should have cost them one million dollars, this should match the expenses reported by the party for the concert together with any in-kind donations, such as artists performing for free. Giving a mathematical example, we should find that:

Estimated value of participation of artist in campaign event (monitor estimate) = **Reported payment to artist (should be included in the party/candidate *expense* report)** + **Reported in-kind donation by artist by offering reduced rate or no charge (should be included in the party/candidate *income* report)**

Monitoring spending on campaign advertising

Advertising is a major campaign expense category in many countries, and many CSOs monitoring campaign finance include it in their work.[26]

For all types of advertising, whether the *design and production* of adverts should be monitored and included in the PET spending estimates must be decided previously. This may be highly relevant for advanced campaign adverts, though less so for basic or homemade adverts. Establishing estimates for the costs of advert design and production can be difficult, but asking for quotes from production companies to establish unit cost estimates can help.

Monitoring paid advertising in online media

While election campaigns have been active in online spaces for quite some time, during the last few years digital advertising has become a significant part of campaign spending in a growing number of countries (in others, remains a minor expense category). The Electoral Commission of the UK has shown that the share of online advertising of total advertising spent increased from less than 2 percent in 2014 to over 40 percent 2017 (though note that campaign advertising on television and radio is banned in the UK).[27] While television advertising is a major expense category in many U.S. election campaigns, the 2016 presidential election campaign by Donald Trump is also reported to have spent more than 40 percent of its total advertising budget on online advertising.[28] An overall estimate for the 2020 U. S. elections is that digital media accounted for close to 20% of overall advertising spending.[29] The official data from the 2021 elections in Georgia indicated that online advertising amounted to 17% of total advertising expenditure (an increase from 10% in the 2020 elections).[30]

While campaign spending on online advertising has increased in many countries, efforts to monitor such spending have not kept up. We have also often been reliant on the official reporting by electoral contestants, which may not be accurate and in any case is often not broken down by type of advertising.[31] *It is also difficult to write about the monitoring of online advertising in a guide of this kind, as things often change very rapidly in this realm.*

A valuable starting point and step-by-step guide on monitoring spending on online advertising is included in "Monitoring Online Political Advertising: A Toolkit".[32] While mainly aimed at international election observation missions, this report includes checklists for analyzing the regulatory situation in a country, on regulations by social media platforms and for monitors.

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[26]   For example, in the monitoring of the 2017 election campaign in Nepal, "...a designated media officer was responsible for monitoring advertisements on two major Television Channels (Nepal TV and Kantipur TV); 11 major daily newspapers and two FM radio stations (Ujyalo FM and Radio Sagarmatha)."Samuhik Abhiyan (2018) page 6.
[27]   Electoral Commission United Kingdom (2019).
[28]   Worldaquire (2019).
[29]   Forbes (2020).
[30]   Transparency International Georgia (2021) page 31, Transparency International Georgia (2020c) page 31.
[31]   Countering Disinformation (2021).
[32]   Jouan Stonestreet & Baldassaro (2021).

The social media companies and other entities with large digital advertising footprints have addressed campaigning on their platforms in different ways. Giants such as Facebook and Google allow political advertising and have set up systems to provide public information about political advertising that appear on their platforms. In the case of both Facebook and Google, these systems have significant limitations (as discussed below), but they are a critical first step in increasing transparency on the platforms.

Facebook maintains an Ad Library, which shows information about the advertisements that have appeared on "Facebook apps and services, including Instagram."[33] While the Ad Library is available in 196 countries, as of early 2022, Facebook enforces an added layer of transparency for ads related to elections and politics in 120 countries, and the list of countries covered has been extended several times.[34] In these countries, advertisers must undergo a verification process and disclose that the ads they are running are political or electoral ads. In some countries, disclosure is also required for social or issue ads. Those ads are searchable via the Ad Library webpage, or a user can navigate from any individual Facebook Page to the library, where all of the ads being run by that page are aggregated. Facebook also allows users to register for access to the Ad Library API, which allows users to import data from the Ad Library to develop their own analysis or visualizations of the data. Political Ads are stored in the library for seven years and include data about the time period during which the ads were run, estimates of how many users saw the ad and how much it cost, and very basic data on how the ad was targeted. The Ad Library has been criticized for not maintaining a complete record of relevant advertising and for having insufficient enforcement of its advertiser verification and disclosure process.[35] Facebook has also taken legal actions against researchers who have attempted to collect more comprehensive ad data in other ways.[36] Nonetheless, the data available via the Ad Library can be of significant interest to CSOs or oversight bodies monitoring campaign spending.
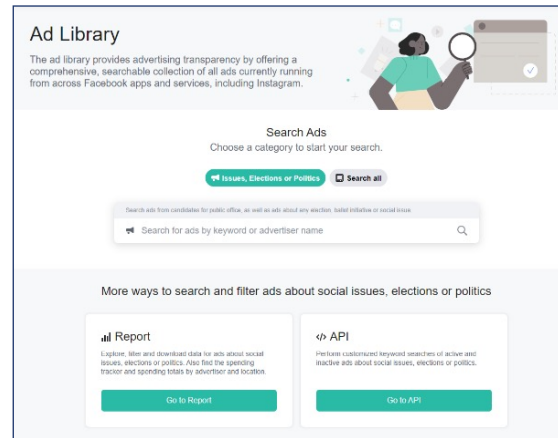
The Google Transparency Report shows political advertising that has appeared on "Google, YouTube and partner properties".[37] As of late 2021, the geographical coverage of the Google Transparency Report is limited to the European Union, the United States and six other countries. Google has not recently added additional countries. To run political ads, users are required to verify their identity. Political ads are included in a searchable database, and the data contained in the transparency report can be downloaded as a CSV file. For each ad, Google discloses the time period during which the ad was run, a wide estimate of how many impressions the advertisement received and how much it cost to run, as well as basic data on how the ad was targeted. Google has a fairly narrow definition of political advertisements, capturing only ads that feature or are run by candidates, political parties or serving elected officials.

Twitter announced in late 2019 that the company was banning political advertising on its platform.[38] This meant that the "Ads Transparency Center" that Twitter had been running up until that point has become largely obsolete, as no new political adverts are supposed to be posted.[39] TikTok similarly bans political advertisements, though researchers

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33   Facebook (2021a).
34   Facebook (undated).
35   Edelson, Lauinger & McCoy (2020).
36   Wall Street Journal (2021).
37   Google (2021).
38   For further information, see Twitter (2019).
39   Twitter (2021).

suggest that there are few limitations or transparency measures to prevent third parties from sharing political content that they have been paid to produce.[40]

There is a shared lack of transparency into non-contestant ("third-party") paid political content on social media platforms across platforms.[41] Similarly, paid engagement with social media content that mimics organic engagement and artificially inflates the popularity of content or the rate at which it spreads through social networks has limited avenues for increasing its transparency. Attempts by political actors to bypass transparency efforts by, for example, covertly paying third parties for negative campaigning or organized harassment campaigns against their opponents must also be carefully considered. In Guinea for example, researchers at the Stanford Internet Observatory turned up evidence of a network of Facebook pages run by Guinean president Alpha Condé's political party. The network, using false accounts, deployed coordinated efforts to amplify party propaganda while obscuring their paid connections to the party. The Stanford researchers observed that "[t]he Guinea case raises broader questions about where and how to draw the line between modern political campaigning in the age of social media and coordinated inauthentic behavior."[42]

Spending on online campaigning is not limited to paid advertising. Information collected for this guide shows that some monitoring projects have tried to monitor paid-for "likes" on Facebook or bots used for campaigning purposes, but largely without great results.[43] In some cases, these tactics are related to the foreign influence and foreign financing of election campaigns, though they are also increasingly being used in domestic political campaigns in the absence of regulations or norms for online campaigning. Putting a price tag on such efforts can prove particularly challenging, and this is a critical area for further research and innovative approaches, as well as for advocacy for further transparency.

In many countries, different national online media outlets (various websites, sometimes referred to as "portals") may play a significant role in the advertising spending by electoral contestants.[44] In such cases, CSOs and oversight entities wishing to monitor campaign spending should contact these outlets far in advance to advocate for the importance of transparency data on campaign spending. The engineering of effective transparency tools and portals that share accurate data and maintain user privacy require lead time and resources on the part of platforms to develop; oversight actors should recognize that making progress on this front requires sustained engagement, and progress may ultimately rest with legal and regulatory reforms that raise outlets' obligations to increase their transparency. Such regulation may need to happen at a supranational level to be effective. If national outlets are unwilling to share ad transparency data, advocates and regulators should push platforms to establish the cost structures that the platform uses for advertising to allow for the creation of unit cost estimates (see above). The dynamic pricing structures of digital ads, which can fluctuate in real time based on numerous factors driving demand at any particular moment, require the global community and platforms to continue to refine the ways in which they track costs and ensure pricing equity across political contestants (if mandated by national electoral law).

Organizations interested in monitoring spending on online advertising should carefully study what data sources are available (these sources are likely to change rapidly given online dynamism), and how such data can be used to monitor campaign spending. Transparency actors around the world are grappling with the need to develop new monitoring methodologies for spending on online media and by political contestants, both directly and via third parties.[45] Some transparency actors are using the ad data available from Facebook and Google, if available, to create reports and visualizations of party and candidate political ad buys, the cost of placing such advertisements, and how political parties are targeting ads toward users.[46] Others are piloting techniques to compare political party expenditure reports to information available from Facebook and Google, though the financial data provided by the platforms is not always precise enough for a detailed comparison. The exchange of approaches, software and lessons learned among civil society organizations and oversight bodies can help accelerate the learning pace and adoption of new tools that enable this data to be used to serve organizational and institutional mandates.

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[40] Fast Company (2021).
[41] Reuters (2020).
[42] Stanford Internet Observatory (2020).
[43] On the use of bots in election campaigns, see, for example, Keller and Klinger (2018) and Caldarelli, De Nicola & Del Vigna *et al.* (2020).
[44] See, for example, the role of Seznam.cz in the Czech Republic, as described in Havlíček and Rajtr (2020).
[45] See for example For What It's Worth (2022).
[46] See for example ICDS (2020).

Identifying the platforms most commonly used for online advertising in a particular country at a particular time is essential to develop an effective monitoring approach. Note, however, that what is relevant today may not teach us much about the best approach to adopt in tomorrow's election. Since the history of online activity teaches us that the dominant players have changed over time, an additional challenge is to find solutions to monitoring online advertising that are not dependent on particular platforms. The Padre platform in South Africa is one example of civil society and election oversight bodies working together to create a repository of online political advertisements independent of the platforms; while currently voluntary, political actors may, in the future, be required to disclose all online advertisements, creating an independent, nationally-owned repository of advertisement data.[47]

Despite the challenges in monitoring online advertising, the targeted nature of such advertising can make it more efficient in terms of cost per connection or view. Social media advertisements can be targeted at particular interest groups, demographics, or geographic regions. Thus, although aggregate costs spent by a particular campaign or candidate on social media or other online advertisements may be lower than traditional media, there is potential for a larger audience to be reached.[48]

Monitoring paid advertising on television and radio

While online advertising is increasingly accounting for a larger part of campaign expenses in many countries, it is often significantly smaller than advertising spent in other media, and, in particular, on television. When the Joe Biden presidential election campaign launched a major advertising campaign during the summer of 2020, the spending was 220 million U.S. dollars on television advertising as compared to USD 60 million for online advertising.[49] In most countries, spending on television advertising tends to largely outdo radio advertising. However, in rural areas in countries where many people still reply on the radio, radio advertising may still be a significant expense category.

CSOs from Afghanistan to Ukraine have monitored campaign spending on broadcast media. A first consideration is often whether it might be possible to access reliable spending data without doing your own monitoring. Groups wishing to carry out PET may benefit greatly from partnering with other CSOs that are monitoring media during election campaigns. However, it is important to establish if the other groups include paid advertising in their monitoring. If they focus on media attention and tone during the campaign, this may be relevant in identifying hidden advertising (see further page 70), but such information is not valuable for establishing advertising costs.

International media companies such as Nielsen and Comscore monitor media use and advertising on a regular basis, as do country-level companies in various countries.[50] The data that they produce may be prohibitively expensive for many CSOs, but these companies may be willing to share data once it has reached the end of its shelf life for regular commercial purposes. Groups interested in monitoring advertising in broadcast media should therefore study who may be monitoring paid advertising in the country, and how such data can be accessed.

Often, however, the only workable approach to monitoring broadcast media advertising is for the CSO activists to do it themselves. This may require a dedicated media monitoring team with a coordinator and monitors working according to a set schedule. If television broadcasts are regularly available online (as was the case for the spending monitoring effort for Transparency International Georgia), monitors can access the station websites and simply fast forward between advertising slots.[51] Where this is not possible, it may be necessary to record digital broadcasts, or even record and convert analogue broadcasts into an electronic format (as FEFA did when they monitored spending on broadcast advertising in Afghanistan).

Different projects have found that accurately monitoring paid campaign advertising on television can take somewhere between 8-16 minutes per hour of broadcast monitored, though this can vary significantly depending on the extent of campaign advertising and the monitoring conditions. For each paid advert detected, the monitor should note the

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[47]   Padre (2021).
[48]   American Bar Association (2020).
[49]   The Daily Beast (2020).
[50]   For example, in the monitoring of paid advertising in broadcast media during the 2021 Czech parliamentary elections, Transparency International Czech Republic drew on information received from the international company Nielsen and from the Czech company Monitora. (Transparency International Czech Republic, 2021).
[51]   In some cases such materials remain available for a certain time period, and it is important to establish in advance this time of availability.

contestant, channel, date, time the advert started and length. This information is then used to calculate the cost of the advert using the PET methodology. A checklist for this type of monitoring should be developed. To do so, inspiration can be drawn from sample checklist 7 in this guide, see page 135.

In determining which channels and times should be monitored, consider the following:

Consideration	Things to bear in mind
Whether to monitor television and/or radio	Ask people with media expertise about the relative overall spending on television and radio advertising, and people with insights into election campaigns about the approach taken by election campaigns. *As an example, the 2022 monitoring by CRTA ahead of the general elections excluded radio since they judged that "radio [has] lost its relevance as a source of information".*[52]
Which channels to monitor	Consider which channels the selected contestants are likely to focus their advertising spending on (information sources can include experiences from previous elections and known connections between political actors and media outlets). *As an example, the CRTA 2022 monitoring focused on "all television channels with national coverage".*[53]
Which days and times to monitor	Focus on peak hours (varies between countries, but often morning and late afternoon and evening). Although contestants may also place advertising during non-peak hours, they are likely to pay much more for peak-hour advertising (and they may be given off-peak slots for free if they pay significant amounts on peak-hour advertising). *As an example, the CRTA 2022 monitoring focused on the timeframe between 5:30pm and midnight.*

Spending by Non-Contestants ("third parties")

The discussion in this chapter has focused on monitoring the campaign spending by officially nominated candidates and duly registered political parties, lists, coalitions or citizen initiative groups. However, in many countries, campaign spending is increasingly incurred by other players as well. These are often referred to as "third parties", and their activities as "independent spending", though it may be more helpful to refer to them as "non-contestant campaigners." The billboard in Figure 9 is an example of this type of advertising .[54]

Such spending can be incurred by anyone, from private individuals to civil society organizations and corporations. A few countries have banned spending by others than official electoral contestants, but this is rare, and would in some regions be seen as an undue limitation of the freedom of expression. However, if the raising and spending of money

FIGURE 9. EXAMPLE OF NON-CONTESTANT ADVERTISING

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[52]   In more length, CRTA stated that "In Serbia, radio [has] lost its relevance as the source of information... it lost its socio-political influence by being degraded only to entertainment – in other words, radio today means music. CRTA's strategy is to primarily monitor those media that are most consumed in Serbia (television) and are the most relevant as source of socio-political information, which then allows us to conclude if the equal and objective information about the election offer exists or not. Overall, television is the most consumed media throughout the years... In deciding about monitoring priorities, we rely on available information - such as public opinion polls (done by CRTA or others), audience measurement data, qualitative research, etc." Personal communication with CRTA monitoring team, 28 February 2022.
[53]   CRTA (2022). This included five channels.
[54]   The billboard was financed by the CSO "Varta", campaigning in favor of the political party by the same name in the 2020 local government elections in Ukraine. It features the slogan "Varta runs in the elections". Photo kindly provided by the Chesno Civil Movement.

by non-contestant campaigners is left unregulated, there is a risk that regulations on how parties and candidates can raise and spend money become meaningless. For example, if a candidate cannot receive foreign donations or spend more than a certain amount but there are no such rules for non-contestant campaigners, a loophole is created where foreign donors can give unlimited amounts to a civil society group, which could spend this money to campaign for the candidate.[55]

Some countries have addressed this issue by requiring that non-contestant campaigners register if they wish to spend money on election campaigning (see, for example, political action committees in the U.S. or so-called "non-party campaigners" in the UK), and they may be subject to spending limits.[56]

In the context of monitoring campaign spending, there is no fundamental difference between the monitoring of spending by candidates or political parties and the spending by non-contestant campaigners. The methods discussed above such as PET can be utilized for monitoring spending by others than parties or candidates as well. If the goal of the monitoring is to establish the total amount spent on election campaigning, including spending by both contestants and non-contestants may also be the most accurate way to do so. Where campaign materials note who paid for them, the distinction between contestants and third parties is also more straightforward.

However, oftentimes it is difficult to differentiate between non-contestant campaigners and contestants' spending. For example, if a candidate organizes a concert during the campaign period, we would normally count all associated costs as part of their campaign expenses. However, if a charity organizes a concert to raise awareness about adult education, and a certain candidate appears to give a campaign speech for ten minutes, what share of the total spending for the event should be considered campaign spending? Even less clear, if non-contestant campaigners engage in negative campaigning (against a certain candidate in a multi-candidate race), how can their spending in favor of any particular candidate be calculated?

Accounting for the engagement in election campaigns is especially complicated where non contestant actors frequently make use of non-financial resources. Monitoring by the CSO MANS in the 2020 Montenegrin elections showed the significant engagement of the Serbian Orthodox Church in Montenegro.[57] The church was directly protesting against the Freedom of Religion Law which had been adopted in 2019, but since these protests took place during the 2020 election campaign, the criticism by the church of the then government was seen by MANS as non-contestant campaigning, and the main opposition coalition connected their election campaigning to the church's activities. MANS did not claim that the church had violated any legal provisions, but stressed that the law in Montenegro "highlights certain loopholes in Montenegro's regulatory framework governing the activity of third parties. Those loopholes could be abused to circumvent the prescribed prohibitions and limitations in the election process by ways of indirect third party support to election campaigns in cases where no formal links to political entities exist."[58]

Whether non-contestant campaigner spending should be included is often discussed in preparing CFM projects. Including these actors in the monitoring can give a more accurate picture in cases where political parties and candidates spend a significant portion of their funds through CSOs or other entities that are officially independent but effectively serve as fronts for avoiding transparency and limits on income and spending. In practice however, it has often proved difficult to make the case that the spending by a particular CSO should be added to a particular party or candidate's spending (especially when it comes to negative campaigning). A common compromise is to address this issue in the CFM project's reporting, giving examples of non-contestant campaign spending (including by foreign actors), without making any attempt to quantify the exact amounts spent on such campaigning. In the long run however, civil society actors should decide on the most suitable form of regulation of non-contestant campaigning, and advocate for appropriate regulatory reform.[59]

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[55]   See OSCE/ODIHR (2020).
[56]   See, for example, Electoral Commission United Kingdom (2020).
[57]   MANS (2020) pages 145-150.
[58]   MANS (2020) page 150.
[59]   See OSCE/ODIHR (2020).

Crowdsourcing information about campaign activities

In some situations, the best solution to gather information about campaign spending may be to ask the public to help. This is especially the case when monitoring is especially difficult to do with a small group of monitors, and when centralized information (for example, from advertising companies) may be unavailable or unreliable.

The app used by Transparency International Czech Republic (for Android, iPhone and Windows) is an example of this. It allowed Czech citizens to report billboards and banners they spotted for contestants in the 2014 elections. The Czech initiative FerVolby was set up for similar crowdsourcing of information in the 2018 Senate elections, and an app with a similar purpose was used by the civil society group Chesno in Ukraine.[60]

Crowdsourcing information is particularly valuable for monitoring campaign activities that break existing legislation or regulations. For example, the Punjab Elections Monitoring app for Android, developed by the Punjab Information Technology Board in Pakistan, allows voters to report violations including violence and "terrorism," in addition to banned campaign spending such as that used for oversized banners, posters and billboards.[61] In 2020, the Justice Development and Peace Makers' Centre, Osogbo (JDPMC) used a similar app to monitor money in the election campaign for the Edo Gubernatorial elections in Nigeria. The app, bearing the catchy name "JDPMC/IFES Campaign Finance Monitoring (JICAFIMO) app" was "used to collect, track, monitor and validate political parties' expenses, the Use of State Administrative Resources, vote buying and Party agent deployments in real time."[62]

FIGURE 10. THE APP USED BY JDPMC IN MONITORING THE 2020 EDO GUBERNATORIAL ELECTION

One of the challenges developing systems for crowdsourcing information about campaign activities and spending is ensuring the collected information is sufficient enough and of good enough quality and integrity to justify setting up the system. Some CSOs have discontinued crowdsourcing initiatives when they have found they do not live up to their expectations. For example, the Czech *Fer Volby* initiative was discontinued due to a lack of user input. CSOs interested in using crowdsourcing should carefully plan the purpose of using such initiatives and the data that the system will be expected to gather. Using focus groups or similar approaches to test out the likely interest and willingness of average citizens to participate is also recommended.

FIGURE 11. SMARTPHONE APP FOR CROWDSOURCING INFORMATION ON USE OF BILLBOARDS IN ELECTION CAMPAIGNS

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[60]   The Ukraine Android version is unfortunately no longer available in the Google Play Store.
[61]   See Google Store (2018).
[62]   JDPMC (2020) page 2.

One of the Center for Monitoring and Research in Montenegro (CeMI)'s projects serves as another example of crowdsourcing information. CeMI has previously worked to develop the CrowdTangle platform to build capacity to monitor reports of gender-based discrimination in politics. These types of platforms and initiatives have potential applications for campaign finance as well.[63]

How to extrapolate from the monitored spending

The spending monitored by a PET project will always be lower than the actual spending since it is impossible to cover everything. Trying to get closer to the "true" spending requires *extrapolation*. By extrapolation we mean the process wherein the monitored data is used to make estimates of spending that cover areas not directly monitored. An ultimate goal can be to come up with an estimate of the total amount of spending by all political parties and candidates in the entire country during the entire campaign period. However, as we will further examine below, arriving at such a figure requires making a number of assumptions and therefore extrapolating must be approached with great care. It should not be an afterthought – the approach that the monitoring team wishes to take should be considered in advance, and should influence the project's delimitations (see page 82).

PET projects do not necessarily have to include any extrapolation at all. If the monitoring organization is sufficiently satisfied with the information yielded and deems it possible to offer an interesting enough picture of the relevant campaign spending despite the project's delimitations and it fits the project's goals, no extrapolation is necessary. It certainly helps if contestants under-report their campaign spending to such an extent that the monitored spending exceeds the contestants' reported spending, even without extrapolation.[64]

Extrapolated estimates can either be presented as a fixed amount or as a range. In the former case, if you monitored 10 million (of the relevant currency) in expenses and assume that the total expense is twice that amount, you would present an extrapolated estimate of 20 million. In the latter case, if you assume that the total expenses were between 50% and 150% higher than what was monitored, you would present the extrapolated estimate as between 15 and 25 million.

Extrapolating from each type of delimitation

All extrapolations start with the delimitations made in the project design and work towards the unknown total spending. Types of extrapolation consequently include:

Extrapolating over geographical areas

If spending by a particular set of political parties and/or candidates has been monitored in a limited geographical area, assumptions can be made about their spending in all areas where they compete (for a parliamentary candidate that could, for example, be the entire constituency, or the entire country for a political party). Several factors need to be taken into account, especially the number of potential or likely voters in the monitored area versus the total area.

Campaigning in urban areas may also include different levels of expenditure compared to rural areas, so it is helpful if the monitoring covers both types of areas. Finally, remember that contestants are likely to spend more in marginal areas than in areas that are sure victories or impossible wins for them.

Notwithstanding these difficulties, extrapolation over geographical areas is still the most common way that monitoring projects aim at extending their monitored data beyond what is directly monitored.

Extrapolating over time

When considering extrapolation of monitored spending data over time, the length of the official campaigning period (if one exists) is the logical starting point. This can vary from a week to half a year.

In many countries political parties and candidates will start spending money long before the start of the official campaigning period begins. Therefore, it may be advisable to start PET monitoring before the actual start of the official campaign period. However, where campaigning starts months or even years before the official campaign, it impossible to cover with any monitoring effort. Extrapolating from the monitored data back in time poses difficulties.

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[63]   CeMI (2020c).
[64]   See, for example, Samuik Abhiyan (2018) page 17.

It is common for spending to increase significantly shortly before the start of the reporting period for political parties and/or candidates, as they may try to hide some of their economic flow from the public eye. However, it is not easy to make estimates about what was spent before that time, and the project may simply need to make clear that its focus is on a certain timeframe, leaving aside whatever was spent before that period began. However, if the project can only monitor expenses during part of the official campaign period, it is possible to extrapolate findings for the entire campaign period. For example, if it is estimated that a certain contestant spent one million (of the relevant currency) on television advertising during the second month of a three-month campaign period, it is reasonable to argue (barring any information to the contrary) that if the contestant spent half that during the first month and at least the same amount during the last month, (s)he would have spent at least 2.5 million. This illustration also clearly shows how any extrapolation over time is, by necessity, based on assumptions.

Extrapolating over expense categories

In many cases the monitoring will only include certain expense categories, and it can be particularly difficult to extrapolate from monitored data to spending on categories that are not included. If we, for example, have monitored that selected parties spent 10 million on television advertising and billboards, how do we extrapolate their spending on posters and campaign rallies? One approach would be to simply note that the total spending will be higher than the estimated amount and refrain from offering a more precise estimate. If the focus of the CFM project is to establish if contestants have accurately reported their spending in particular expense categories, it is not necessary to extrapolate the monitored data.

Extrapolation across all contestants

It is theoretically possible to extrapolate that if you have monitored 10 contestants and they have spent 50 million (of the relevant currency) in total, then all 100 contestants may have cumulatively spent 500 million. However, great care must be taken in making such an assumption given the often-significant variation in spending between contestants. If the delimitation of the project has included only selecting the most important or major political parties or candidates, you will not have data on minor parties or candidates' spending, and can therefore not make estimates about their spending.

Estimating the totality of campaign expenses in an election

As the above has shown, extrapolation in this context means going from the delineated monitored data to the estimated total spending for each type of delimitation. If you want to offer an estimate of the total spending in the overall campaign, the next step is to go from these estimates to an estimate of the total expenses, for all areas, during the entire official campaign period and for all contestants and expense categories. Remember that the uncertainties attached to each estimate will carry over to the total figure and should be presented with care. It is generally better to be conservative and make estimates with great care.

TABLE 7. EXTRAPOLATING FROM MONITORED SPENDING

	Monitored	Total
Parties or candidates		
Timeframe		
Geographical areas		
Expense categories		
Total expenses		

Monitoring campaign income

Focus of this section: Introducing the notion of monitoring campaign finance *income*, including both the advantages and challenges of such monitoring.

Content of this section:

- Why campaign finance income is important and why CFM projects should consider monitoring it
- Highlighting difficulties in monitoring campaign income
- Outlining possible approaches to monitoring campaign income

Why campaign finance income matters

One of the main themes in campaign finance discussions concerns the potential influence those who provide funding to election campaigns (and other parts of the political process) may have over politicians and their actions, which would go against democratic practices. In many cases, it is argued that the influence of wealthy interests poses a significant problem for the democratic process.

Undue influence can come simply from someone providing a large amount of funding to politicians (in particular, a large *share* of the total income of a political party or candidate). However, there are some sources that are often considered more problematic than others, independent of the amounts provided. For example, as many as 69% of countries around the world ban donations to political parties from *foreign sources* (59% ban donations from foreign sources to candidates as well).[65]

Controlling foreign funding is complicated because of the many ways such funding can flow, as illustrated in Figure 12. The above-mentioned bans on foreign funding only cover cases where foreign funding is given directly to an electoral contestant ("A" in the Figure). While the flow of foreign funding through official campaign accounts may be limited, effective oversight of these accounts is essential for detecting campaign activities that are carried out outside this framework.

FIGURE 12. ROUTES OF FOREIGN FUNDING OF ELECTION CAMPAIGNS

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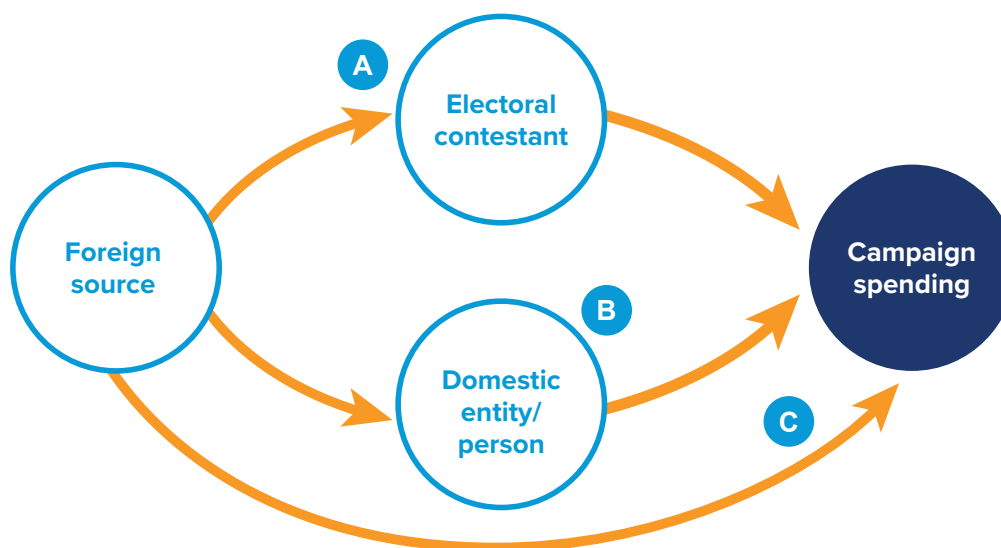
[65]   International IDEA political finance regulation database. Data from 178 countries regarding political parties, 174 countries regarding candidates.

Foreign funding may also flow through non-contestants in another country (individuals or organizations, "B" in the Figure), connecting to the concept of non-contestant or "third party" campaigning (see page 32). Finally, foreign actors can also spend money directly on electoral campaigning in another country, without that money ever entering the country ("C" in the model). This predominantly relates to online advertising and other forms of online campaigning, see page 28 for further detail.

Bans on corporate donations to political contestants are less common. Where such donations are allowed, it is sometimes considered potentially problematic given the close ties that often exist between business and politics, and the risks that politicians may make decisions in favor of their benefactors.[66] At the same time, in its handbook on the observation of campaign finance, OSCE/ODIHR has noted that "…any limitation on private campaign financing must be reasonable and proportionate to an individual's right to freedom of association and expression."[67]

Campaign donations' sensitivity may also be connected to the recipient. Transparency International Georgia has, for example, claimed that "[d]onations received by the ruling party are more likely to be accompanied by particularly high risks of political corruption, because the authorities have the lever to make a deal with a potential donor in return for certain benefits"[68]

Why campaign finance income is difficult to monitor

While it is very important to know where political contestants get their money from, it is often also exceedingly difficult to find reliable information on this matter.

Financial reporting requirements often include requirements for contestants to reveal their sources.[69] However, surprisingly often, legislation does not explicitly state that individual donors should be identified, or what information should be included. If the records only state that "Mr. Park" from "Smallville" made a donation, this may be insufficient information for identifying the donor if there are many Mr. Parks living in that locality.[70] Regardless of the official reporting requirements, election contestants often find ways to get around reporting the identity of their donors. For example, reporting various legal or private individuals as donors, despite the actual origin of the funds being someone else. The use of cryptocurrencies for campaign donations can further complicate the situation.[71]

As a result of these challenges, most CFM projects do not heavily focus on campaign finance income. The reports from many campaign finance monitoring projects have been reviewed in the development of this guide, and less than a handful of them include information about campaign income, beyond noting information that exists in the formal reports submitted by the contestants themselves. The type of independent and systematic monitoring discussed in Chapter 3 regarding campaign spending is seldom, if ever, possible regarding campaign income. The situation is further complicated in countries where no official distinction is made between ongoing political party finance and campaign finance, or where political parties largely fund their election campaigns through bulk transfers from the regular party funds to the election campaign account.

As previously mentioned, many countries ban donations from foreign sources. Even where foreign funding is permitted however, information about political actors receiving financial support from abroad may be difficult to access or to verify given the sensitivity of potential foreign influence over domestic political actors. CSOs wishing to monitor foreign funding should consider the options available. This might include seeking cooperation with banking institutions, if these are willing to share relevant information.

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[66]   The issue of corporate influence over U.S. politics has been debated and regulated for many years, from the Tillman Act in 1907 to the Citizens United ruling by the U.S. Supreme Court in 2010.
[67]   OSCE/ODIHR (2015) page 34.
[68]   Transparency International Georgia (2020c) page 17.
[69]   Three are however exceptions. In several South Asian countries, for example, reporting requirements only relate to campaign spending.
[70]   In Sweden, legislation explicitly bans the publication of information about individuals making donations to political parties on the website of the oversight institution, although this information is accessible to anyone visiting the office of the oversight institution in question.
[71]   See International IDEA (2019).

Approaches to monitoring campaign finance income

The Open Society Justice Initiative handbook on campaign finance monitoring states that "Disclosure requirements are a prerequisite for monitoring campaign income, "since it allows for controls of whether reported donations actually originate with the person claimed to have made the donation.[72]

Three types of controls of campaign income are further outlined in the Open Society Justice Initiative handbook, and are discussed below, drawing on monitoring experiences from after the publication of the handbook.

Comparing income declarations to monitored expenditure

The accuracy of reported campaign income can be monitored indirectly by comparing it to monitored spending. For example, if a candidate reports a total income of a certain amount, but the PET monitoring indicates that their spending was higher, reasonable questions can be raised about where the additional funds came from. This approach can be especially effective where there is a significant discrepancy between reported and monitored spending.

Regulations on in-kind donations and discounts (see page 27), and on campaign spending by non-contestants (see page 32) are very important in this regard, as contestants are likely to argue that discrepancies between reported and monitored spending relate either to people donating items to the campaign at a discount or for free, or that certain spending was incurred by other actors. If there is a requirement to report in-kind donations, the reported contestant spending and reported in-kind donations must match the total monitored spending. An argument that discrepancies between reported and monitored spending were caused by others incurring expenses can be checked if non-contestants have to report on their campaign spending (or if contestants have to report on spending "on their behalf".)

FIGURE 13. USING DATA ON SPENDING TO MAKE JUDGEMENTS ON UNREPORTED INCOME

Electoral contestant

Reported spending (all categories)

10 million

Reported in-kind donations and non-contestant spending

Monitored spending

30 million

Monitored spending

? Where did the remaining 20 million come from?
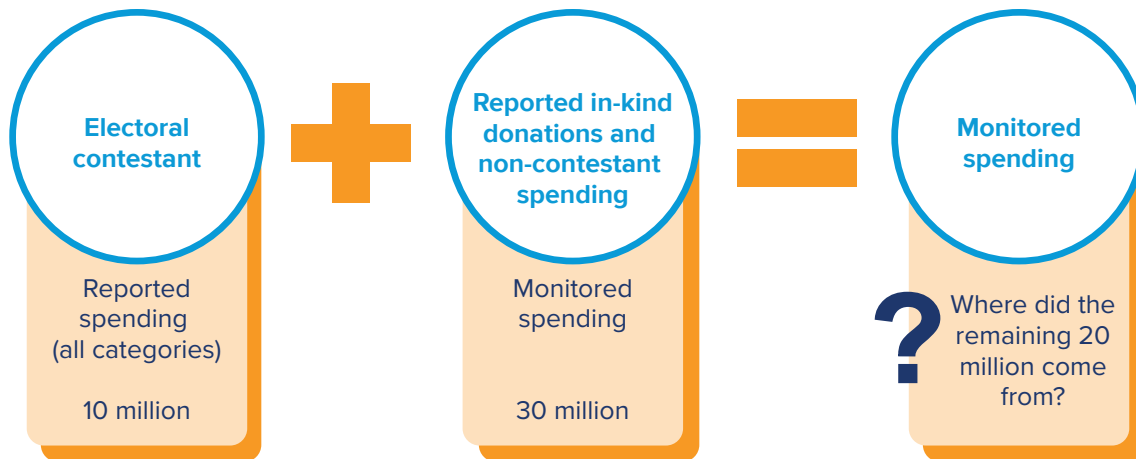
Assessing the veracity of disclosure statements

This includes controlling reported individual donations against other information to establish the credibility of the reported sources of income. Such controls can be very difficult unless other relevant information is also available.

One interesting example is Moldova, where regulations exist to make the officially recorded income of individuals public record. This allowed the Moldovan CSOs *CReDO* and *Centrul Parteneriat pentru Dezvoltare* to compare the reported donations by individuals with their personal income. They found that an average of 10% of reported donors (for two parties, 1/3 of their donors) had given more money than they themselves had earned the previous year.[73] Such findings are not evidence of rule-breaking (as it is possible that these individuals made donations from their savings), but it is an indication that the records of campaign donations may not correctly show where the money originated.

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[72]   The Open Society Justice Initiative (2005) page 19.
[73]   CReDO and Centrul Parteneriat pentru Dezvoltare (2010) pages 17-19.

Where donations are reported but not available in a user-friendly format, CSOs can create their own database with donation records to allow for easier controls by media, other CSOs and the general public. This was done, for example, by Transparency International Georgia, partly as a tool to encourage the public oversight institution to follow suit, which it did.[74]

Transparency International Georgia used these records as part of its analysis of the income reported in the political parties' annual reports from 2019 (not technically campaign finance, as there was no general election that year). They pointed to a considerable number of donations from people connected to specific corporations, often made the same day.[75] Similar monitoring was carried out in 2020 and 2021, both election years.

Tracking quid pro quo donations

Campaign income records can also be used to monitor for potential "quid pro quo" donations, where an individual or corporation make a donation in return for special favors. This can include public projects, which is why comparing campaign donation records with data on public procurement can be remarkably interesting. In 2020, Transparency International Georgia, for example, outlined how many companies connected to donors to the government party had won large government contracts.[76] For further information about monitoring quid pro quo donations, see pages 92-95 in the Open Society Justice Initiative handbook.[77]

Analyzing submitted records of campaign donations

Unfortunately, across the globe it is exceedingly rare for most individuals' tax or income records to be available to the public. When there are publicly available, the official donation records by electoral contestants may not make a major difference in themselves, as finding additional ways to verify whether such records are accurate is necessary. Analyzing and publishing information about donations that political parties and candidates claim to have received can in itself be important in raising awareness about political income, and about the accuracy of reported income. As an illustration, the National Election Watch in India publishes income reports from political parties going back (in some cases) to 2001.[78] As a complementary measure, the Association for Democratic Reforms analyses the reported donations.[79] One analysis showed that during the 2019-2020 financial year, more than 90% of donations came from

> During the 2019-2020 financial year, more than 90% of donations came from corporations, and one individual company made donations equating to above 20% of the total income of the two largest political parties in the country.

corporations, and one individual company made donations equating to above 20% of the total income of the two largest political parties in the country. In contrast, the analysis of official data by the CSO Chesno in Ukraine has led them to conclude that the 2016 introduction of public funding has made the parties there "addicted" to public funds.[80]

Another example is the Integrity Watch Europe initiative that Transparency International launched in 2021.[81] This links eight different databases from different European countries, including officially reported donation records from Italy, Latvia, the Netherlands and Spain.

An indirect way of exploring campaign income is to review *loans* taken out by candidates and political parties. As Transparency Serbia noted in their report on 2014 campaign finance, "a bank loan can only be an initial source of funding – these debts must be paid from other income, which at the time of submitting the reports was not known."[82] Their review of formal campaign finance reports showed that through loans, some political parties had ensured that nearly half of their final campaign income was not revealed in their official post-election reports.

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[74]   The Transparency International Georgia database is available at https://transparency.ge/politicaldonations/, and the State Audit Office version is available at https://monitoring.sao.ge/ka.
[75]   Transparency International Georgia (2020a).
[76]   Transparency International Georgia (2020c) page 17.
[77]   The Open Society Justice Initiative (2005)
[78]   National Election Watch India (2021).
[79]   Association for Democratic Reforms India (2021).
[80]   See Chesno (2021). Quote from Chesno (2018).
[81]   Transparency International (2021).
[82]   Transparency Serbia (2014) page 8.

Investigative journalism and interviews

Investigative journalism can be another valuable approach. For example, in a documentary about political finance in Mauritius, the journalist producing it interviewed a series of businesspeople and party activists about their experience. The interviews illustrated the widely varying views and experiences that exist among those active in political financing in the country.[83]

In a study that spans across the issues of campaign income and non-contestant/third party involvement, Atlantic Council investigated the Rights and Freedom Club in Germany, which seemed to have spent as much money on campaigning in favor of the rightwing Alternative für Deutschland party as the party itself had.[84] Despite benefitting from this indirect income, the party was not required to report on it, and due to German regulations, nor was the Rights and Freedom Club. One way of looking at this finding is as an in-kind income of the Alternative für Deutschland party in the form of non-contestant spending.

Investigate journalism can include off-the-record interviews with businesspeople. Naturally, those interviewed may not be willing to talk openly about direct deals that they have made with individual politicians, but they may be willing to talk about the climate between politics and business in general, and sometimes they are surprisingly candid. CSOs wishing to monitor and raise awareness about campaign finance should consider close cooperation with credible and independent investigative journalists (to the extent such exist in the country) to collaborate in the provision and verification of information and in reaching the desired project outcomes and goals.

Asking political parties to provide information

In addition to other activities, surveys can provide valuable information about campaign income and related areas. In 2020, Transparency Serbia sent a survey to all political entities that participated in the elections that year. Nonetheless, the initiative also points to potential shortcomings of a survey approach in certain situations, as the report admitted that "[t]he response rate to the questionnaire we sent was extremely low."[85] Transparency International had a similar experience when using surveys of political parties in Kosovo in 2017.[86]

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[83]   See ION News (2015).
[84]   Atlantic Council (2018).
[85]   Transparency Serbia (2020) page 5.
[86]   Transparency International Czech Republic and Kosovo Democratic Institute (2017) page 11.

Monitoring abuse of state resources

Focus of this section: Explaining the concept and importance of abuse of state resources, and the many different approaches that have been used around the world to monitor it.

Content of this section:

- What abuse of state resources is and why it is important to monitor
- General considerations in monitoring abuse of state resources
- Overview of methods for monitoring abuse of state resources
- How to monitor different types of abuse of state resources, including financial, institutional, regulatory and enforcement resources
- Criteria for judging when abuse of state resources has occurred
- Estimating the financial value of abuse of state resources

The importance of abuse of state resources and why it must be monitored

While elections are held to select governments in most countries, they do not always give the electorate a truly free choice to select their leaders. Abuse of the electoral process can take many forms, from ballot box stuffing to orchestrated political violence. Attempts by those with access to the state to use its resources to ensure electoral success are particularly harmful to the democratic process and to the efficient administration of a country. IFES has authored several reports and papers about the negative impact of abuse of state resources across the electoral process.[87]

Monitoring potential abuse of state resources should be considered by any organization wishing to give a complete and accurate image of an electoral process. Admittedly, monitoring in itself will not lead to improvements. It is crucial that the monitoring is suitably combined with advocacy for regulatory reform and awareness-building initiatives about the dangers of abuse of state resources.

How to define abuse of state resources

The IFES Abuse of State Resources Research and Assessment Framework applies the definition of abuse of state resources proposed by OSCE/ODIHR: "the undue advantages obtained by certain parties or candidates, through use of their official positions or connections to governmental institutions, to influence the outcome of elections." [88] Drawing a line between the advantages that all incumbents gain from being in power (holding elected office, for example, means extra media attention in all countries) and the misuse of the resources they have in their position can be a complex task. In general, actions that significantly harm the fairness of the electoral process or the quality of governance can be deemed abuse.

The focus here is on how abuse of state resources can be *monitored*. For further discussions about the definition of abuse of state resources, and its various connotations and on how to regulate against abuses of state resources, please see the IFES Abuse of State Resources Research and Assessment Framework and Part III of the IFES Political Finance Oversight Handbook.[89]

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[87]   See for example Ritchie and Shein (2017) and IFES (2018).
[88]   OSCE/ODIHR (2015) page 68 and IFES (2018) page 3. Self-enriching corruption (theft of state resources for personal use) is normally not included in the concept of abuse of state resources; only abuse of such resources to serve political goals. See also OSCE/ODIHR and Venice Commission (2016).
[89]   IFES (2013) and IFES (2018).

Considering what different state resource categories are particularly relevant and are more likely to be abused in a given country is a useful starting point for monitoring abuse of state resources. All of the resources below can be legitimately used as part of the process of managing a country, but they can also be abused for political and electoral purposes.[90]

CFM projects can also focus on abuse of one, some or all of these types of state resources. As will be discussed below, monitoring the use of regulatory and enforcement resources is likely to be particularly challenging, requiring frequent judgments of whether a violation has occurred, which can be prone to accusations of bias. Some would rather consider abuse of regulatory and enforcement resources as cases of abuse of power.

TABLE 8. DEFINITIONS OF TYPES OF STATE RESOURCES

Type	Definition
Institutional Resources	Non-monetary material and personnel resources available to the state, including publicly owned or controlled media and other communication tools
Financial Resources	Monetary assets, normally part of the budget of various levels of government, as well as publicly owned and/or managed institutions
Regulatory Resources	The mandate to pass laws and regulations that control allowed and prohibited behavior related to electoral competitions; this regulatory prerogative includes anything from the criminal code to the order in which candidates should appear on the ballot paper
Enforcement Resources	How security, law enforcement and other institutions implement laws and rules in relation to electoral competition set up using regulatory resources

General considerations on monitoring abuse of state resources

The legality and legitimacy of abuse of state resources

Many political parties and politicians in elected positions will, in some way, seek to use their position to enhance their chances of re-election. The fact that these activities are often not illegal under domestic law, nor do they explicitly violate international obligations (which are often vague), can make monitoring abuse of state resources challenging.

The fact that a certain activity may not be illegal does not mean that it should not be monitored. To make a comparison - if there are no rules in a country against ballot box stuffing or voter impersonation, we would not consider that such practices therefore do not constitute voting fraud there (rather, it would be deemed a shortcoming of the country's regulatory framework).

Some activities are subtler, such as elected politicians using their position and access to public resources to highlight their achievements. A regulatory framework with no rules at all on how public officials can behave would rightly be criticized, but there is a limit on how detailed the regulatory framework can or should be. In some areas the main goal may be to contribute to altering actors' behavior, and monitoring can highlight behavior or practices which need to be changed.

In considering monitoring of abuse of resources, CSOs should therefore identify which types of activities would be subject to **A)** action by oversight institutions/the judiciary (only activities covered by the current legislation), **B)** legal reform initiatives (activities that could or should be covered by legislation, which, for example, means they must be objective and enforceable) and **C)** advocacy for altering actors' behavior (things that would be hard to enforce legally, including activities that could be *perceived* as abuse and should therefore be avoided).

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[90]   This categorization is discussed further in Chapter 11 of the IFES *Political Finance Oversight Handbook*. For an alternative categorization of state resources, see Open Society Justice Initiative (2005) pages 100-101.

FIGURE 14. ASPECTS OF ABUSE OF STATE RESOURCES
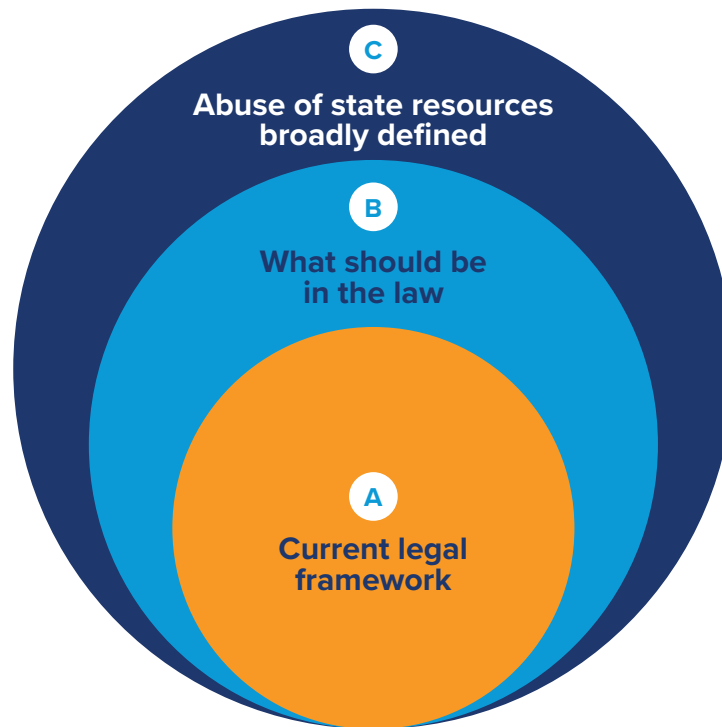
Groups wishing to monitor abuse of state resources should therefore consider that their findings regarding potential abuse of state resources might be divided into:

1. Activities that are prohibited by current legislation in the country (A)

2. Activities that are not currently prohibited by current legislation, but that should be (this involves making recommendations for legal reform (B))

3. Activities that may harm the electoral and democratic processes, but that are not suitable for legal reform, causing the CSO to instead call for a change in institutional behavior or for political actors to alter their behavior (C)

The considerations above also directly influence how CSOs report on monitored cases of potential abuse of state resources. The task is often to *persuade* the target audience that recorded cases unduly favor one political side or hinder others. This has a significant impact on how monitoring of abuse of state resources needs to be carried out, and how the results of monitoring should be presented. While maintaining strict neutrality and faithfulness to the monitored data, it is important that the arguments for any cases that the monitors see as abuse of state resources be presented as clearly and convincingly as possible, with fact-based evidence.

It also means that the methodology and process of verifying information must be carefully explained. For example, in its budget monitoring, Transparency International Georgia separates legal and illegal abuses of financial state resources and applies different approaches to each (see page 50 for further detail). In 2020, Transparency International Georgia concluded that:

> The Georgian legislation provides a narrow definition for the misuse of administrative resources during electoral processes, frequently leaving a number of issues outside of regulation. In particular, an administrative body may carry out a series of activities that, although in compliance with the law, might provide goods to the society in such a way that it garners a significant impact on voter behavior. In such cases, it is difficult to draw a line between the state and a political party that represents a requirement under the 1990 Organization for Security and Cooperation in Europe (OSCE) Copenhagen Conference Document.

Hence, when referring to the misuse of administrative resources during the electoral processes, we mean not only violation of the Georgian legislation, but also acts against the spirit of the Copenhagen Document and universally accepted electoral principles.[91]

Accusations of bias

In monitoring election campaigns in general, and monitoring campaign finance in particular, all relevant political actors should be included, and strict neutrality and attention to detail can (to some extent) protect the monitoring entity from accusations of political bias.

However, monitoring abuse of state resources is particularly sensitive from this perspective since in most cases only the political party or parties in power have access to these resources and therefore the ability to abuse them. Monitoring abuses of state resources can therefore be presented by some as an anti-government or pro-opposition activity. This can threaten the credibility of the organization and, in some situations, the safety of the persons involved as well.[92]

Groups wishing to act against abuse of state resources must be aware of the risks involved, and act to minimize the risk for potential accusations of bias. For example, if the CFM project covers areas other than abuse of state resources, it is important to point out misdeeds by other political actors too.

The Open Society Justice Initiative recommends that the presentation of findings should be "depersonalized" as much as possible.[93] In general, this is a sound recommendation, and you may want to consider referring to the "ruling" and "opposition" parties rather than using the parties' names. This approach is, however, unlikely to make a major difference in a country where there is only one political party in power, and therefore the expected beneficiary of any abuse of state resources. Carefully explaining the project methodology may, however, reduce the risks of accusation of bias, and it can be advantageous if the CSO publicly presents its methodology and intended approach before the monitoring begins.

> Monitoring abuses of state resources can be presented by some as an anti-government or pro-opposition activity. This can threaten the credibility of the organization and, in some situations, the safety of the persons involved as well.

Time considerations

It is possible to include abuse of state resources as a theme in election day monitoring; some forms of abuse may take place on election day, such as using security agencies to intimidate voters in opposition strongholds or transporting voters likely to support a particular party using public vehicles.

However, the vast majority of abuse of state resources takes place sometime before the actual polling, often several months in advance. It is important to consider when you expect abuses to start appearing or for them to become more frequent, or when you may be able to start gathering data to show trends in behavior. Although the situation will differ for each country, the below figure may give guidance (in practice of course, it may not be possible to continue the monitoring for months or years after an election). Further information about the timing of monitoring abuse of state resources is included in Figure 15 below (remember to take into account the official campaign period, if one exists).

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[91]   Transparency International Georgia (2020) page 8.
[92]   There can be situations where actors who are not in power are able to abuse such resources. This can for example happen when a political party that has spent a long time in power is able to abuse its control over the state machinery also after an electoral defeat, or where a political party that is in opposition nationally can use resources it has access to through sub-national electoral success.
[93]   The Open Society Justice Initiative (2005) page 126.

FIGURE 15. IDEAL TIMING OF MONITORING ABUSE OF STATE RESOURCES (EXAMPLE)

Time	Monitoring activities
6 months before elections	Gather information about budgets and conduct interviews with public officials (see "budget monitoring" on page 50 below)
4 months before elections	Start monitoring public spending, including new infrastructure projects and increases in pensions
2 months before elections[94]	Start field monitoring of campaign events, public events, etc. Monitors can use the checklist inspired by the samples included in this guide, starting on page 126.
Election day	Include questions relating to abuse of state resources in election-day questionnaires for short-term monitors
3 months after elections	Study if public spending decreased after elections. Study if areas that did not vote for the election winner receive less public funds than those that did
12 months after elections	Monitor whether public procurement contracts, tax credits and similar benefits from public funds have been given to those who financially supported the electoral winner

In practice, it may not be possible to start monitoring as early as is anticipated above, and not all projects will cover all forms of monitoring activities. There are sometimes groups that monitor the political situation in their country on an ongoing basis. This can be very valuable when it comes to responding to evident examples of abuse or cases that are highlighted in media reports. Note that abuse of state resources often takes place behind the scenes, and is, in many cases, not directly against the law, requiring a more concerted monitoring efforts in line with the established project methodology.

The involvement of CSOs, media and citizens in monitoring potential abuse of state resources can send a strong message to government institutions and officials that what they do and how they act is under the public eye's scrutiny, further incentivizing them to be transparent and accountable.

Overview of methods for monitoring abuse of state resources

As with general monitoring of electoral processes, various methods can be used to monitor abuse of state resources. The main methods for monitoring abuse of state resources in different countries include:

Direct monitoring (field monitors)

Many initiatives to monitor abuse of state resources will depend, at least partly, on field monitors observing state actors' and political stakeholders' activities. Ideally, people should monitor such abuses at all times, but that is rarely possible in practice. Most projects have monitors on the ground for around one to two months before an election. Compared with "regular" election monitoring, projects designed to monitor campaign finance (including abuse of state resources) often rely on fewer monitors, though these often undergo more comprehensive training, and may spend more of their time on the monitoring effort. Focusing monitoring on areas that are strongholds of different political forces, including, if possible, areas controlled both by government and by opposition parties, can help the organization disprove accusations of bias.

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[94]   Resources permitting, it may be advisable to start monitoring using Field Monitors even earlier.

Organizations with limited access to funding may consider partnering with other organizations that deploy a significant number of long-term monitors. Election monitoring groups may consider strategic collaboration with Anti-Corruption groups that engage in longer-term monitoring of political activities, including abuse of state resources. Overall, partnership between organizations can offer significant advantages, though it is important to carefully consider the roles of each partner organization and the overall goals and administrative structure of the project.

Media monitoring

Formal monitoring can ascertain if publicly controlled media is being abused in favor of or against a particular political party or candidate. While private media can be misused in various ways, for the purposes of the discussion here, our focus will be on media that is owned or controlled by government entities, which can include the central government, sub-national government entities or entities such as ministries or publicly-owned entities. This includes both traditional media such as newspapers and television channels, as well as newer forms of media, including publicly-owned websites and government-controlled accounts on private online platforms such as Facebook, Twitter and Snapchat. The approaches available for monitoring publicly controlled media are discussed further starting on page 58.

This form of media monitoring differs significantly from efforts to ascertain amounts spent on advertising in traditional and online media, see page 28 – 32.

Getting information through the media

This is hugely different from what was discussed in the previous section. Whereas before we were looking at monitoring bias in public media as an abuse in itself before, this section concerns getting information about potential abuses *through* (public and private) media. It is a more informal study of various types of private and public media to see whether any cases of direct or indirect abuse of state resources are reported.

In many cases, media can be a valuable source of information, especially where the monitoring organization does not have the capacity to cover large areas of the country with field monitors. However, caution is necessary. Stakeholders may wish to present inaccurate information in the media to discredit their opponents, and some information may be based on outright misunderstandings. It is helpful to, before monitoring, investigate the media environment to assess sentiments and potential manipulation. Information received from media reports should not be included in monitoring reports unless the information has been verified for accuracy through independent sources (this can include using a rumor tracker, see page 110).

When the Center for Anti-corruption Research and Initiative Transparency International monitored abuse of state resources in Russia, they included information in various media among other tools to collect information. They noted, however, the limits of this approach in the systematic collection of data, arguing that "At best, media monitoring may yield ad hoc instances of such misuse and the usefulness of such findings depends on the extent to which such instances appear in the media."[95]

Where media freedom is limited, using media reports, even as indicators of potential violations, may not be a reliable approach. Variations in the number of accusations of abuses over time may be explained by changes in media freedom rather than by changes of the number of violations.

Interviews

Interviews with various involved stakeholders can provide valuable information, although the information obtained from them must be verified as well. Public officials and party activists on the local level are sometimes unaware of the regulations around the use of state resources and may admit to violations without realizing it.

Examples of this approach can include casually asking drivers of publicly-owned vehicles where they drove the week before (the information they provide can be used to establish if they have transported officials for campaign activities, such as participating in campaign rallies). For more on monitoring the use of publicly-owned vehicles, see page 57. In the same manner, you can ask junior staff engaged in public institution events who participated in an event, what

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95   Center for Anti-corruption Research and Initiative Transparency International (2004) page 39.

took place during an event and if any materials were handed out. The information they provide can be used to ascertain if political actors participated in events which were financed by public means, whether campaigning took place or if materials were handed out in the name of a particular political party or candidate. For further information about monitoring public institution events, see page 56.

Senior officials are often warier to discuss issues of this kind but interviewing them can still be useful for verification purposes. It can also be useful to conduct interviews with representatives of the Election Management Body and related institutions to see what they are doing to counteract illegal uses of state resources during election periods. Interviews can also be used to verify potential cases of abuse of state resources that have been reported through other channels.

Review of public documents
Another important approach is to review written documents. While it is rare that documents will include outright admissions of violations, analyses of state budgets and spending data can be very valuable. This is particularly important in relation to the monitoring of government budgets and spending (see page 50 for further detail). Reviewing public documents can also be valuable in the use of regulatory and enforcement resources (see pages 59 and 60, respectively).

In many countries, freedom of information requests may be a way to access public documents that are not directly publicly available (for example, on the websites of government authorities). In practice, many CSOs have found that public entities are slow and reluctant to respond to freedom of information requests, especially if they are related to information that may be sensitive, or if the request comes from organizations that are known to be active in the political realm and potentially critical of the government.

A general piece of advice is to start submitting freedom of information requests (or similar) long before an election, and to start by requesting information that is less likely to be considered sensitive. That way, government institutions and officials become used to sharing public information with your institution, and they may be more willing to continue to do so when elections draw nearer and when requests relate to more sensitive information.

Information directly from the public (crowdsourcing information)
Most monitoring efforts of abuse of state resources are based on long-term observers, sometimes combined with interviews and budget and/or public media monitoring. A problem with these approaches is that it is often difficult to get detailed information about what is happening on the ground, especially in rural areas. Where the media is not free to investigate and report on possible violations, or does not have the capacity to do so, it may be difficult to find cases to verify.

One approach can then be to turn directly to the public. A basic hotline (often connected to a mobile phone manned by someone working with the project) can be used to collect information about potential violations. The hotline number would need to be widely advertised to ensure it is used as a crowdsourcing tool. Alternatively, or additionally, election observers can be trained on how to document and use available reporting channels to aggregate their reports of abuse of state resources, which may result in more credible and better documented reports of violations.

Online technology can also be used to collect and illustrate received data on abuse of state resources. Crowdsourcing websites are useful for gathering information about electoral violations of various kinds, including violence, vote buying and abuse of state resources. In 2020, the Montenegrin CSO CeMI launched the Fair Elections website, asking people to report on potential violations.[96] In 2022, CeMI intends to conduct a public awareness raising initiative around what constitutes abuse of state resources, and to make citizens aware that they can report cases of potential abuse through the Fair Elections application they have developed. Various phone-based technologies such as SMS, apps and photo and video functions can be used to collect information about possible abuses of state resources. Using tools such as Mapme or ArcGIS StoryMaps, reported cases can be put on a map to show concentrations of reported violations. Both tools integrate with web form applications (e.g., Google Forms) that allow those submitting content to share stories, photos and videos to support their claims.

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[96]   See CeMI (2020a).

Social media can also be used to detect instances of abuse of state resources. CeMI, for example, used CrowdTangle, a tool owned by Meta that is available to vetted researchers, to monitor the official accounts of government ministers, public companies, political contestants and media outlets for evidence of abuse of state resources. Finding, for example, a media outlet's social media post about the misuse of a state vehicle during campaigning. They also set up alerts for clusters of key words related to infrastructure, write-off of debts, social benefits and other words potentially indicative of public expenditures to identify social media posts that showed incumbents campaigning around these events.[97] Low-tech solutions may also provide valuable information. For example, the survey conducted by COMFREL in Cambodia in 2012 to study abuse of state resources in the country.[98] They used a survey of 8,672 eligible voters at village level in 24 provinces/municipalities. The survey found that public officials' and security personnel's involvement in campaigning was not uncommon, and that public vehicles and buildings were used for campaign purposes.

Regardless of how data from the public is collected, it is essential to ensure that it is accurate. The same risks for getting information from the media apply, and project personnel may need to personally contact the individuals concerned for verification. In this regard, consider whether anonymous reports of potential violations should be received and considered. Forcing anyone wishing to report a violation to reveal their identity is likely to reduce the number of reports, potentially significantly. On the other hand, anonymous reports may be difficult to verify.

Common criteria for verification include the number of independent reports that an event has taken place; how well-known and respected the source is by the monitoring organization (partner organizations are often given special weight); and whether the monitoring organization was able to confirm the reported information itself. For example, a case of a violation can be considered suitable for inclusion in reports by the monitoring organization if it fulfills one of these criteria:

- The case has been reported by at least X unknown sources and has been confirmed by the monitoring project or by a partner organization

- The report has been reported by at least X sources, including at least X trusted source

- The report has been reported by a trusted source and has been confirmed by the monitoring organization

If a rule is used that a certain number of sources are needed for a reported violation to be considered verified, it is important to ensure that the sources used are *independent* of each other.[99] Data verification was taken very seriously for the Elect UA project, a partnership with, among others, Internews Ukraine, which reported on various types of violations related to Ukrainian elections.[100]

Whatever method is used, it is important that the personnel involved, whether volunteers or paid workers, organization staff or temporary project activists, have a good understanding of the task at hand and how they are supposed to monitor and report on abuse of state resources. It may not always be necessary for all monitors to have in-depth knowledge about the nature of such abuses, however. In most cases the key is for them to know what to look for and to report it in a reliable and verifiable manner. The final judgement of whether a certain activity constitutes abuse of state resources will often lie with the project core team, to avoid different judgements made by different people and confusing the impact on the information reported.

Monitoring different types of abuse of state resources

Below you will find a discussion about how various types of abuse of state resources can be monitored. Under each heading the type of monitoring that would most commonly be used for observing the particular area in question is noted. The most appropriate approach to monitor abuse of any particular type of state resources will naturally vary between countries.

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[97]   CeMI (2020b).
[98]   COMFREL (2012). The survey questions are available on pages 17-19.
[99]   For further information about verifying reports, see Silverman (2014).
[100]   See http://electua.org/

Budget monitoring

Type of monitoring: Document review, interviews

Increasing public spending on items that are likely to bolster the popularity of the political parties and politicians that control the state finances is a commonly used approach to enhance chances of re-election. The nature of the spending is crucial; no government party will grow in popularity by creating an institution for statistical analysis, for example. Rather, it is the spending in areas that directly impact the lives of ordinary people, in particular the ones in Table 9 (in no particular order).

> Budget monitoring is the analysis of allocations and spending of public funds to determine if funds are used during a pre-election period in a way that gives undue advantage to a particular political actor.

TABLE 9. TYPES OF PUBLIC SPENDING FREQUENTLY TARGETED FOR ABUSE

Type of public spending	Comment
Hiring of public employees	Especially for *short-term* contracts, and especially where unemployment is high[101]
Salaries of public employees	The state is often the biggest individual employer, and changes in public employee salaries can affect a lot of people (including family members and dependents of those working in the public sector)
Pensions	Many voters depend on state pensions, especially in countries where private pension savings are rare[102]
Other forms of direct monetary payments, such as support for childcare or unemployment benefits	Some groups of voters are directly dependent on financial subsidies of various kinds. In different contexts, this may, for example, include young people, healthcare workers, pensioners and teachers.
Voucher allocation to identified groups, for example regarding food aid, fuel or electricity	Similar to the above, but for systems where support is given through a voucher system rather than direct financial support
Subsidies in areas such as fuel, food and social services	General subsidies on important items. Fuel often has a special status, but food, electricity and access to medical care often play a significant role in people's lives
Financial assistance targeted at minorities	Disadvantaged ethnic and religious minorities are often especially targeted by attempts at electoral fraud, and abuse of state resources is no exception – these groups are often especially dependent on public subsidies
Tourist marketing campaigns	It is certainly in the interest of governments to increase the number of tourists visiting the country. If launched shortly before an election though, such campaigns can be designed to increase sentiments of patriotism and support for the leaders of the country.
State marketing campaigns	Similar to the above, but focusing on the achievements of the government, government entities, or publicly controlled companies. Judgements must be made when campaigns of this kind should be considered as abuse.

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[101]   In a secret recording of the then government party in Montenegro in 2012, one senior official argued that "…for each DPS employee employed [in the public sector], this party can count on four votes on average…" MANS (2020) page 86.

[102]   For example, MANS CFM project regarding the 2020 elections in Montenegro showed how pensioners with the lowest pension level received a "double July check" just ten days before the elections. MANS (2020) page 105.

Type of public spending	Comment
Building/renovation of schools, hospitals	Especially important in places where social services have declined as result of conflict or neglect
Building/maintenance of roads and railways	Infrastructure is often crucially important for ordinary voters, not only for transportation but also for their livelihood.

There are some countries that ban certain types of activities during pre-election periods. For example, the Montenegrin Law on Financing of Political Parties includes a long list of activities that the state must not engage in during the pre-electoral period, such as giving state aid to companies, giving loans to farmers or increasing welfare payments by more than 5%.[103] In most countries however, there are no legal hindrances against this type of activity; public opinion is the only force against such abuse, which is where budget monitoring by civil society actors comes in.

Budget monitoring refers to the analysis of allocations and spending of public funds to evaluate whether funds are used during a pre-election period in a way that gives undue advantage to a particular political actor. The type of activities monitored here come in two forms: increases in the budgetary allocation to the above areas and increases in spending outside the formal budget structure that amount to abuse. In terms of impact on the democratic process or effective administration, the difference between these types is normally limited. However, there is a significant difference in how these activities are monitored. Budget allocations are normally determined some time in advance, and monitors can often analyze budget data before the official campaign period starts. In some cases, the budget allocations are set more than a year before an election.

However, monitoring budget allocations will often not capture the entire picture, for two main reasons:

1. Budget allocations are sometimes general and do not give details about exactly how, and importantly, *when* funds are to be spent. An annual allocation for road maintenance may be in line with that in preceding years, but if all these funds are spent during the months before an election (with nothing remaining for the post-election period), this action may unduly favor the government party/parties (and it will most likely lead to bad roads). Budgets may also include "other" categories that allow spending aimed at increasing the popularity of incumbent political parties or politicians. In the 2020 elections in Montenegro, monitoring by MANS showed how spending in the "other" category in the budget was "twice as much as in the previous year."[104]

2. Budget allocations may not be followed. In some cases, various types of emergencies may be used as a pretext to transfer funds from one area to another. The monitoring by Transparency Serbia in the 2012 elections showed, for example, that the spending on "urgent procedures" reported by the Directorate for Public Procurement increased three-fold before the elections in comparison to the preceding year, amounting to EUR 70 million.[105] In other cases, unbudgeted income that is spent within the same fiscal cycle can result in spending.

Because of this, those interested in how public funds may be used for political purposes should also try to access documents showing the *actual spending*. In some cases, this information may not be available until after an election, necessitating a longer-term approach (and, in some cases, Freedom of Information requests from relevant institutions). Exactly how data can be accessed varies from country to country. Institutions dealing with the spending mentioned in Table 9 should be special targets for Freedom of Information requests or similar approaches. These may include the Ministries for Health, Communication or Infrastructure, Education and Social Development (or similar).

Conducting interviews with public officials as part of the budget monitoring effort can also be useful. Ideally, such interviews should be conducted early on to allow for comparisons between what they state as the institution's goal during the fiscal cycle and the actual spending before the elections.

One group that has spent several years monitoring public budgets from the perspective of abuse of state resources

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[103]   For other examples, see Chapter 12 in IFES (2013).
[104]   MANS (2020) page 134.
[105]   Transparency Serbia (2012) page 19.

is Transparency International Georgia. Georgian law does contain certain restrictions on how budgets and spending can be changed during pre-electoral periods (though the regulations are less detailed than in Montenegro). Even so, Transparency International Georgia has not found many direct violations of Georgian legislation in the course of their budget monitoring, which has been going on since 2008.

The focus has instead come to lie on what Transparency International Georgia terms "legal abuse of financial resources," and they have developed the concept of "electorally motivated spending" to describe these activities. Examples of electorally motivated spending include:

- Unplanned disbursement of public funds during an election campaign period without clear justification

- Introducing new unplanned publicly funded investment projects, such as construction or renovation of state or municipal housing, medical and social service facilities, schools, parks, or roads

- Institutional advertising, i.e., boosting the image of incumbent parties or politicians by increasing advertising of government activities

Funds used for these purposes must come from somewhere, and Transparency International Georgia therefore monitors "where freed-up resource shows up; what use these resources are put to; and whether the purpose can be safely regarded to be electorally motivated." The last of these is naturally difficult to monitor, but there have been ample examples in Georgian elections. A key area has been temporary employment contracts, sometimes including more than 100,000 people, and where little justification and little output can be found for these programs (effectively, they represent state-sponsored vote buying).[106]

This is similar to the 2017 finding in the IFES assessment of abuse of state resources in Georgia that:

> A... significant area of concern... is the use of public spending (especially on social programs and public works) to potentially influence voter behavior. Although the letter of the Election Code prohibits changes to local budgets during the campaign period, many note that the spirit of the law is frequently violated. As one interlocutor noted during the in-country assessment, the legal misuse of administrative resources may have a much greater impact on the conduct and fairness of elections than illegal uses... interlocutors noted that state, autonomous republic, and local government budgets can be altered just before the 60-day mark (when the likely election date is commonly known), enabling the implementation of social or infrastructure programs or the dispersal of welfare benefits within the pre-election campaign window.[107]

The importance of having long data time-series

Monitoring abuse of state resources is often more a case of persuading the audience that activities have been carried out that negatively affect the electoral process, than proving that there has been a direct violation of the law (see also page 43). In this regard, it is essential to prove that something happened during the period before an election that would not have happened otherwise.

Simply proving that there has been significant spending is not enough – it must also be demonstrated that there was an *increase* in spending during the period before the elections. Figure 16 shows the incredibly significant increase in public works ahead of the early May 2010 presidential elections in the Philippines.[108]

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[106]   Reports on the budget monitoring by Transparency International Georgia can be found at https://transparency.ge/en.
[107]   IFES (2017) page 17.
[108]   Presidential elections in the Philippines are also interesting since they show that even a ban on anyone serving more than one term as president (consecutive or not) does not stop abuse of state resources. For further information about the PCIJ, which developed this graph, see https://pcij.org

FIGURE 16. EXAMPLE OF PUBLIC WORKS MONITORING (SPENDING IN THE PHILIPPINES)
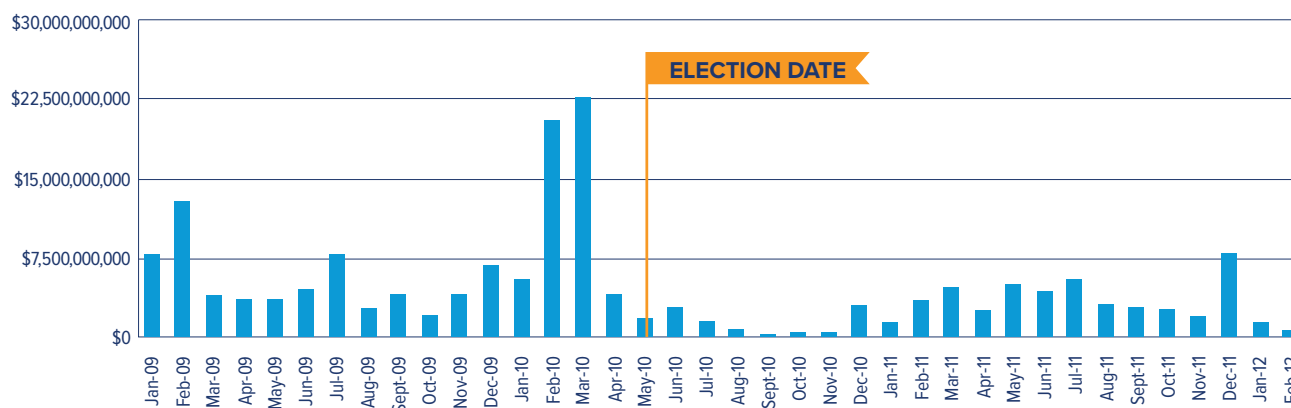
By using a particularly long time-series, Figure 16 also demonstrates that the increases during the months before the elections were not part of a cyclical variation in spending on public works. While admittedly spending was high in February 2009 as well (the year before the elections), there was no increase during the same period in 2011 or 2012. The impact of long time-series is also illustrated in Figure 17 and Figure 18 in the next section.

Monitoring institutional advertising

Type of monitoring: Document review, media monitoring

Institutional advertising refers here to any advertising done by public entities in media aimed at the public (TV, radio, newspapers and magazines). This section only deals with paid advertising in either private or public media – while *bias* in public media is dealt with in a separate section below (both activities may constitute abuse of state resources).

Public entities include ministries, government institutions, publicly owned companies and similar entities. These often have legitimate reasons to advertise; for example, to announce public procurement initiatives or to inform the public about new initiatives. In some (rare) cases, it may also be justified for a public institution to use advertising to improve the public's perception of it and to explain the value of the institution's existence.

However, while *ministers* may run in elections, *ministries* do not, and public institutions should not advertise their activities and success during pre-electoral periods. Indeed, some countries ban or limit the right of public institutions to advertise during election campaign periods.

Even where such advertising is not illegal, a compelling case can often be made that such advertising is unjustified and potentially damaging to the electoral process. The monitoring of institutional advertising can be done by accessing data on the advertising budget or spending by selected institutions. However, in many cases the most effective form of monitoring is likely to be through monitoring the actual placements of advertisements in selected media outlets (in traditional and/or online media). Doing this will require a careful analysis of how political actors currently use different media outlets or have in the past.

Media monitoring of institutional advertising can focus on various issues. The first is the quantity of such advertising (amounts spent or extent of advertising). As an illustration, Figure 17 below shows the spending on advertising by the Ministry for Public Works in Chile in 1999 ahead of the elections in December (this data is admittedly old, but the point is to show the importance of long time-series).[109]

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[109]   The graph is adjusted from Open Society Justice Initiative (2005) page 114. Admittedly the case included here is very old and the media landscape has changed dramatically since the late 1990s. However, it is included here to illustrate the importance of using long-time data series.

FIGURE 17. INSTITUTIONAL ADVERTISING BY THE MINISTRY FOR PUBLIC WORKS IN CHILE

For this type of monitoring, it is important to have a time series of data. As discussed regarding budget monitoring above, it is not enough to show what amount was spent on institutional adverting; the point is to show *relative change*.
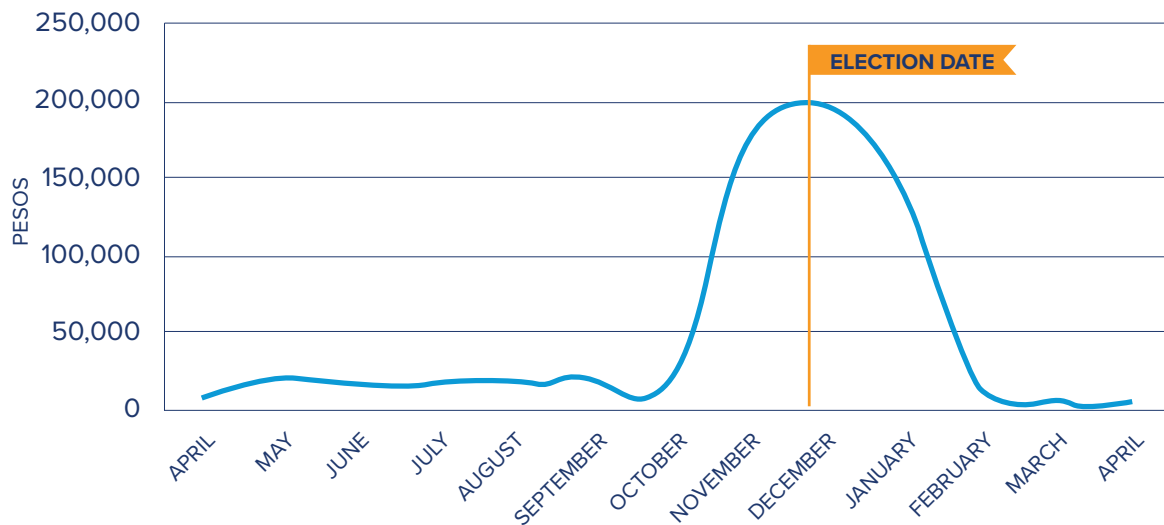
As an illustration, Figure 18 shows the same data as above but including only the months on either side of the election. Nothing in that figure would convince the reader that the level of advertising by public institutions was connected to the elections or that it constituted abuse of state resources.[110]

FIGURE 18. SAME FIGURE WITHOUT A LONGER TIME-SERIES
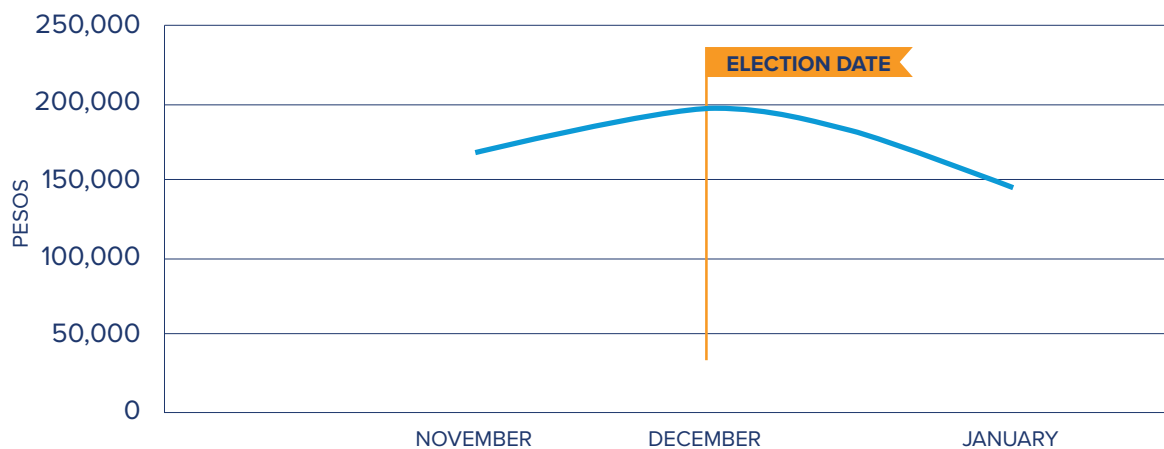
Monitoring can also focus on the *content* of institutional advertisements. The focus here should be on ads that would not normally appear during non-electoral periods. This includes advertisements that emphasize the achievements of a public institution. As noted in the IFES Political Finance Oversight Handbook:

> ...there is no reason for a ministry or other State institution to take out advertisements during a pre-electoral period to highlight the achievements of the institution since the last election. State institutions do not run in elections, and while highlighting their work may be beneficial in increasing public understanding and support in general, doing so during a pre-electoral period is unnecessary and almost infallibly amounts to abuse of state resources. If such advertising cannot be banned outright... state institutions should be encouraged to develop internal guidelines that prohibit such behavior.[111]

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110   Graph is based on data recalculated from Open Society Justice Initiative (2005) page 114.
111   IFES (2013) page 156.

Campaign messages may also be included in advertisements that are ostensibly about public matters. For example, the Transparency International Georgia monitoring of public advertisements showed how advertisements about how to use certain types of public vouchers also included favorable text about the then Major of Tbilisi with claims that he "knows exactly what people need."[112]

Other forms of institutional advertisements that may amount to abuse of state resources are those that congratulate the head of state on his birthday, or that unduly highlight the political head of the institution in question.

For this type of monitoring, you can use a Checklist inspired by sample Checklist 6, 7 and 8 in this guide, starting on page 134. However, make sure that public institution advertising is recorded separately from advertising by contestants so that you do not confuse the spending on advertising by political parties and candidates with the spending by public institutions.

> State institutions do not run in elections, and while highlighting their work may be beneficial in increasing public understanding and support in general, doing so during a pre-electoral period is unnecessary and almost infallibly amounts to abuse of state resources.

Monitoring the use of public personnel

Type of monitoring: Mainly field monitors and/or crowdsourcing

In many countries, the state is a major employer. In 2019, the state employed 18% of the workforce on average in OECD countries.[113] Having a large workforce financially dependent on the state can create a sense of loyalty among sections of the electorate towards incumbent political parties, especially if the same party or parties remain in power for a long time.

The hiring of public employees is dealt with above under the section on budget monitoring (see page 50). This section deals with how public employees are required to participate in campaigning in various ways. In some countries, forcing (in one way or another) public employees to campaign in favor of a political party or candidate is a major form of abuse, and can have a significant impact on the campaign period. This can be limited to participating in campaign events to boost the number of participants, but public employees are sometimes forced to engage more actively in campaigning in favor of a political party or candidate, such as in collecting signatures of supporters. In the past, public employees in Ukraine were reportedly required to distribute thousands of booklets written by an Oblast Council Speaker, constituting direct campaigning.[114]

Even if no pressure is involved, the engagement of public employees may constitute abuse of state resources. In many countries, certain public officials are banned from participating in campaigning, either while on duty or at any time (the latter mainly applies to persons in senior positions). While monitoring campaign and public events, long-term monitors can observe if any public employee participates in campaign events against existing regulations. Photos and videos can add special weight in this kind of case.

Apart from direct observation by field monitors, other approaches can be used to gain information about the use of public employees in campaigning, such as hotlines and crowdsourcing websites, though such reports must be followed up carefully to verify the information (for example, through interviews). The participation of public officials in campaign events may even be reported in the media. The campaign participation of public employees need not be limited to campaign events; a monitoring report from Mongolia found that "a total of 1,141 civil servants were actively involved in electoral campaigns working more than 4,761 hours canvassing votes." [115]

Monitoring the use of public resources at campaign events

Type of monitoring: Field monitors and/or crowdsourcing

Electoral campaigns are an essential part of democratic elections, and political competitors must be free to campaign

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112   Transparency International Georgia (2013).
113   OECD (2021) page 100.
114   IFES (2013) page 161.
115   Schafferer (2004) page 4.

without any undue restrictions. In these endeavors, they may be supported by state institutions providing free venues and other resources for meetings, security and or transport, as long as such support is provided in a regulated manner and is available to all eligible political parties.

However, it is common in some countries that public resources are used during the cause of campaign events by a particular party or candidate. This can include using public vehicles for transporting participants or organizers, holding events at public venues, handing out public resources (food aid, for example) in the name of a political party, or endorsements by public officials.

Where a CFM project also covers other aspects of campaign finance, in particular monitoring of campaign spending, monitoring of campaign events can easily combine monitoring of abuse of state resources and campaign spending.

The exact nature of the monitoring of campaign events will depend on the more common types of events, which varies significantly between countries (and sometimes between political parties or candidates in a particular country). For larger events (rallies and concerts at sport stadiums, for example), several monitors may be needed, while for smaller events (such as day-long events during a market day), monitors may need to monitor the same event at different parts of the day. If possible (and safe), monitors can use cameras or phones to capture relevant information. [116] Since monitoring abuse of state resources is all about persuading the audience that violations have occurred, pictures can be an invaluable tool.

While it is possible to instruct long-term monitors to simply attend any campaign events that they happen to hear about, a more consistent approach is for the coordinator(s) to maintain a list of campaign events and instruct monitors to attend selected events, ensuring a reasonable spread between the monitored contestants. This would often require frequent contacts between the coordinator and the different election campaigns, as well as with the individual long-term monitors.

Several questions relating to the use of public resources during campaign events are included in the sample Checklist 1 (see page 126).

Monitoring campaigning at public institution events

Type of monitoring: Field monitors and/or crowdsourcing

A "public institution event" is an event organized by a public institution to, for example, inform the public about a new vaccination initiative, raise awareness about hate speech, discuss plans for a new road or to celebrate a national holiday - events aimed at the public or at large groups of individuals (for example meetings with all teachers in a town).[117]

In one sense, this is the reverse of the monitoring described immediately above; in these cases, the monitors will observe public institution events to see if any campaigning is taking place. Public events that may be worth monitoring include:

- Inauguration of a new school, hospital or road
- Public celebration (national holiday or particular event)
- Information meeting about new health/education/employment initiative
- Meetings of all persons of a certain profession in a locality (Note: this type of event is often difficult to monitor since access may be restricted. Sometimes, interviewing people who participated in the event is the only way to gain credible information)

Since events of this kind are funded with public resources, any campaigning that takes place at them can be considered abuse of state resources. The only exception would be events where all (relevant) stakeholders are allowed to communicate their political messages in an organized manner, such as in publicly funded election debates.

The main approach to monitoring events of this kind is to use field monitors (though media coverage may also provide valuable information). They monitor if any candidates or political party representatives are present at the event, if

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[116]   For more information about the security concerns for CFM projects, see page 106.
[117]   A "public institution" is, in this context, any entity belonging to or formally controlled by a central, regional a local government entity.

campaign materials are handed out (or public materials handed out in the name of a candidate/party), and if anyone is speaking in favor or against a political party or candidate. In the case of political endorsements during public events, you should instruct your monitors to write down in as much detail as possible what is said. When the organization OPORA monitored public events during the 2012 campaign in Ukraine, they found that campaigning (including handing out gifts by candidates) took place at events such as a welcoming ceremony for the Ukrainian Paralympic team, the inauguration of a children's playground and school rallies marking the Day of Knowledge.[118] Using a similar approach, field monitors in Ghana noted how several public events were used to campaign for the governing political party.[119] Expect that changes will occur over time, so the experiences of campaigning in past public institution events may give limited guidance for future elections.

As with campaign events, having a designated person to maintain a list of public events which the monitors are instructed to attend can be valuable. In this case, close contact with relevant public institutions (where available with their public affairs officials) is essential.

It is also possible to monitor public institution events through reports in the media, if you determine that credible information is included in reliable sources. In some cases, reports about public institution events posted on social media accounts by the public institution itself may include relevant information, especially in contexts where there has been a significant merging between the state and the political party in power.

Several questions relating to the use of public resources during public institution events are included in the sample Checklist 2 (see page 129).

Monitoring the use of vehicles

Type of monitoring: Field monitors and/or crowdsourcing

In some cases, monitoring abuse of state resources may be a difficult or even dangerous task. One of the most basic, and sometimes highly effective, forms of monitoring abuses of state resources is to note the presence of publicly owned vehicles during election campaigns. During the 2017 election campaign in Nepal, the monitoring group Samuhik Abhiyan "observed vehicles bearing government license plates at candidates' or party campaign events, door-to-door visits and corner meetings.[120] Similarly, Transparency International Sri Lanka found in 2015 that:

FIGURE 19. VEHICLE LICENSE PLATES IN PAPUA NEW GUINEA INDICATE THAT A VEHICLE IS OWNED BY THE GOVERNMENT

> During the election period the PPPR observed more than 2400 SLTB buses, almost half of the buses in operational condition, being used regularly to transport public to the meetings and rallies of the then incumbent President and UPFA Presidential candidate Mahinda Rajapaksa even though such use was prohibited.[121]

A key consideration for monitoring the use of is public vehicles is whether they are clearly marked to separate them from privately owned vehicles. In some countries, state-owned vehicles have special registration plates, which make them particularly easy to identify and monitor.[122] In other countries, public vehicles used in campaigning may have

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[118]   OPORA Ukraine (2012)
[119]   In this project, 48 field monitors were active for 2.5 months before the elections, covering 40 single-mandate constituencies throughout the country. See Ghana Center for Democratic Development (2004).
[120]   Samuhik Abhiyan (2018) page 19. See also CRTA (2019).
[121]   Transparency International Sri Lanka (2015) page 20.
[122]   The image in Figure 19 was kindly shared by the IFES program in Papua New Guinea.

their registration plates removed before deployment (this relates especially to vehicles used in more shady types of campaign activities such as vote buying).

Assuming that security concerns allow, monitors should write down the registration numbers of any public vehicles that participate in election campaigning (note that in some cases there may be a legitimate reason for vehicles belonging to security services to be present at campaign events). For more on project security see page 106.

Monitoring the use of public venues

Type of monitoring: Field monitors and/or crowdsourcing
It is perfectly legitimate to let political parties and candidates use public buildings and similar institutions for campaign purposes, as long as this is done in a regulated and fair manner.[123] However, when access is given exclusively or predominantly to one political actor, this amounts to abuse of state resources.

Misuse of public venues is not limited to biased provision of access for campaign meetings. As a result of their monitoring, the Committee for Free and Fair Elections in Cambodia (COMFREL) noted that in Cambodia the government party logo was present on numerous public buildings. On one occasion an opposition party placed its logo next to that of the government party on a public building, only to have it removed by the police shortly thereafter.[124]

One way to monitor such abuses is to have long-term monitors visit selected public institutions on a regular basis (such as schools, hospitals and local government buildings the public already has ready access). A separate checklist can be developed and used for such visits, inspired by sample Checklist 5 in this guide (see page 133). Monitoring by the Stefan Batory Foundation of the 2005 presidential elections in Poland showed that "deputies' offices were commonly used for the needs of local campaign staffs of various candidates".[125]

Monitoring public media
Another area to monitor is the use of publicly owned or controlled media in relation to election campaigns. Bias in their reporting (giving more attention to some actors over others or more favorable coverage) can seriously impede the fairness of the electoral process, in particular in countries where voters rely on public media for information. Incidentally, it is valuable to review any studies about media usage in the particular country to strengthen arguments that bias in public media may be an important form of abuse of state resources since people rely on public media for their news and information .

The key areas that require special attention in monitoring public media are:

- The amount of coverage given to different political parties/candidates
- The tone of such coverage (positive, neutral, negative)
- Allowing some candidates/party representatives to speak freely about their political program while not giving the same opportunity to others (amounting to "hidden advertising" – see the glossary on page 138)
- The amount of coverage of public events that may indirectly benefit certain political parties or candidates (note that this information may be difficult to evaluate without access to similar data during the non-electoral period)

In case political parties/candidates are provided free airtime for political advertisements, it can also be worth monitoring if this is done in line with the regulations. For example, it was found that in the Russian 2003 elections advertisements for the main opposition candidate were broadcast without sound. [126]

In comparison to the issues discussed above, media monitoring is commonly included in longer election media monitoring efforts, and several methodologies have been developed doing so. See, for example, the *Handbook on Media Monitoring for Election Observation Missions* by the Organization for Security and Cooperation in Europe/

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[123]   Such assistance (generally known as *indirect public funding*) may be worth monitoring. In Belarus, it was found that venues allocated to the opposition for campaign events were generally unsuitable for this purpose. OSCE/ODIHR (2006) page 13.
[124]   COMFREL (2012) page 6.
[125]   Stefan Batory Foundation (2005) page 6.
[126]   Center for Anti-corruption Research and Initiative Transparency International (2004) Op CIt, page 95.

Office for Democratic Institutions and Human Rights (OSCE/ODIHR) and the National Democratic Institute (NDI) *Media Monitoring to Promote Democratic Elections*.[127] The ACE Electoral Knowledge Network website also has a section on media monitoring.[128]

Finally, Transparency International Latvia and Lupidus have developed interesting methodologies to monitor for hidden advertising (though their approach was not limited to public media). See, in particular, their report "Analysis of possible cases of hidden Advertising in media prior to 2005 Municipal elections", and page 70 in this guide.[129]

Monitoring public media can give very important results. For example, an analysis in Azerbaijan showed that "State-controlled television and newspapers waged an unlimited propaganda war to discredit opposition parties by blaming them for all of Azerbaijan's failures over the past decade."[130] However, as media monitoring is one of the more common forms of electoral monitoring, groups wishing to address potential abuses of state resources should ensure that their efforts do not duplicate those of others. In some situations, it may be more relevant to seek partnership with another organization that monitors public media and to target the often-limited resources available for monitoring other activities.

It can be discussed under what heading the use of online media by public institutions should be monitored. Websites and social media accounts belonging to public institutions are sometimes used for campaign purposes. Such activities may constitute abuse of state resources since the websites and accounts may be paid for by public means; as civil servants may use them to engage in campaigning during paid worktime; and as the name recognition and reach of the public institution may be used to favor a particular party or candidate. In 2020, the Anti-Corruption Agency of Serbia issued a statement that "political promotion on internet pages owned by the government bodies represents an abuse of public resources," warning public institutions to refrain from such activities.[131]

Monitoring regulatory resources

Type of monitoring: Mixed

Public institutions set the rules for the political game. The right to create these rules can be abused if regulations are created that unduly favor one political actor or hinder another. Rules of this kind can include anything from increasing the minimum age of presidential candidates to stop the candidacy of a particular challenger, to lowering spending limits to frustrate the election campaigns of parties that do not have access to state resources. In some situations, such activities may be discussed as "misuse of power" rather than as an abuse of state resources. Most past CFM projects have, however, not found it valuable to make this distinction, and have included reporting on regulatory and enforcement resources in their reporting.

Regulatory resources are one of the most challenging areas to monitor in the sense that it is often difficult to convincingly show that rules were created, and decisions made to benefit a particular political side or to disadvantage another. The risk of the monitoring group becoming involved in a partisan political debate is larger with this type of monitoring than in many others. Several efforts to monitor abuse of state resources have consequently ignored this area.

However, this can lead to a limited or partial approach in cases where, for example, the incumbent regime is trying to stop a serious contender from even registering to participate in elections. If such attempts succeed, other forms of abuse of state resources may not be necessary. Unfortunately, there are few formal standards on which to base judgements regarding the abuse of regulatory resources. Many of the

> Regulatory resources is one of the most challenging areas to monitor in the sense that it is often difficult to convincingly show that rules are created and decisions made to benefit a particular political side or to disadvantage another.

[127] OSCE/ODIHR 2012, NDI 2002, https://www.ndi.org/files/1420_elect_media_02_1-31_0.pdf. Note that neither of these deal specifically with monitoring abuses of state resources.
[128] http://aceproject.org/ace-en/topics/me/mee The Open Society Justice Initiative handbook on campaign finance monitoring also has a section on the monitoring of public media, with a special focus on the abuse of state resources. Unfortunately, it contains only limited information. Open Society Justice Initiative (2005) pages 111-112.
[129] Lupidus (2005).
[130] Central Asia-Caucasus Institute (2000).
[131] V.I.P News Services (2020) page 3.

international commitments in the electoral area have been gathered by the Carter Center in its database, though these commitments are sometimes too vague to be particularly useful in practice.[132]

One recommendation is to limit discussions about abuses of regulatory resources to cases where the impact of regulations is clearly in favor of or against a particular political actor (sometimes referred to as "systemic manipulation"). The case is normally strengthened if a rule is passed that had not previously been discussed, and if it directly affects a potentially successful electoral challenger. Remember that with the exception of regulations that have been passed through an unconstitutional process, abuses of regulatory resources will seldom include legal violations, but they may constitute breaches of the principles of free and fair elections, or the process of Rule of Law.

A practical example of this form of monitoring is included in the Transparency International Georgia report on the 2020 parliamentary elections, where, under the heading "misuse of legislative administrative resources during electoral processes," they noted that the "the regulations introduced in 2017 allowed the ruling party to have more members in the [Election] commission than it had before the changes, which led to further politicization of the commissions".[133]

Monitoring enforcement resources

Type of monitoring: Mixed
The last type of monitoring we will discuss regards the use of enforcement resources. While the previous category dealt with the creation of rules for the electoral process, this category concerns how such rules *are enforced in practice*.[134] That is, the enforcement of regulations that have an impact on political stakeholders and the electoral process. Such enforcement can, for example, be done by security forces, EMBs and adjudicatory bodies including courts. As is the case with monitoring regulatory resources, such activities may sometimes be referred to as "misuse of power" rather than as abuse of state resources.

In general, it is often somewhat easier to convince an audience that there has been a misuse of enforcement resources than of regulatory resources. The key is to show any bias in how existing rules have been implemented. An important area relates to the provision of permits for campaign events (in countries where such permits are required). Where the necessary legislation exists and is applied in practice, Freedom of Information requests can be particularly useful in finding out how applications for permits have been considered and when such permits have been issued.

A typical example of enforcement resources relates to police permits for election campaign rallies and meetings. Where such permits are required, it is valuable to monitor for indications that certain political parties or candidates are given permits whereas others are not, or that some contestants face delays or other challenges in receiving them. Another indicator that can be monitored alternatively is whether certain parties or candidates are granted or denied permits to put up campaign materials ahead of elections.[135]

Activities organized by institutions authorized to administer electoral processes in general and campaign finance regulations in particular are also of interest. Election Management Body structures at different levels often play especially important roles in the electoral process. In Russia, interviews and reviews of other reports showed the groups monitoring abuse of state resources in Russian elections that authorities "hindered or refused registration to candidates not favored by the local authorities."[136] Another approach to target the opposition was taken in the Kyrgyz Republic some 20 years ago, where "Election authorities used the election law to bar four parties because their charters did not explicitly state that they planned to contest elections."[137]

It is often argued that implemented campaign finance regulations level the playing field. But there are cases where they have been used to specifically target opposition actors and their supporters. The report "An Analysis of the Pre-Election

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[132]   Carter Center (2021).
[133]   Transparency International Georgia (2020b) pages 29-30.
[134]   The line between regulatory and enforcement resources is not always easy to determine, but does not have to significantly hinder monitoring.
[135]   IFES (2013) page 181 gives an example of how billboards for candidates other than the one running for the government party were not permitted by a local authority in Russia.
[136]   Center for Anti-corruption Research and Initiative Transparency International (2004) Op Cit, page 82.
[137]   Karatnycky, Motyl, & Schnetzer (2001) page 223.

Environment, October 2011 – August 2012" by Transparency International Georgia offers an example of how monitoring campaign finance oversight itself became a form of abuse of state resources .[138]

Harassment of opposition donors by tax authorities, a type of abuse that has been reported in a number of countries, is yet another form of abuse of state resources.[139] Unfortunately, it is exceedingly difficult to verify reports of this kind, and the same goes for various other forms of harassment. An IFES review of OSCE-ODIHR International Observer Mission Reports showed that "Cases of pressure and intimidation of voters and public workers were observed in all Eastern partnership countries and Russia (with the exception of Moldova)."[140] How courts engage with appeals is also an important part of how enforcement resources are used.

When a CFM project wishes to address abuse of state resources in elections, monitoring enforcement resources can be a particularly challenging task. Transparency International Georgia's monitoring of the 2020 parliamentary elections included a long list of reported harassment of opposition politicians and activists, but they could not point to clear examples where such harassment had been carried out by public officials or public institutions.[141]

Other areas of monitoring abuse of state resources

These are not all the ways through which state resources can be abused. Chapter 14 in the *IFES Political Finance Oversight Handbook* discusses 100 forms of abuse of state resources, many of which have not been discussed here. A review of that chapter can shed light on potential abuse that may take place in a particular country and how such abuse can be monitored.

Some types of abuses not discussed above that may be useful to monitor are:

- Money being channeled from publicly owned or controlled enterprises to political parties and used for electoral purposes[142]

- Public opinion polling carried out, paid for or formally supported by state entities where results are presented in a manner that benefit a particular political party or politician

- Publication of reports written or paid by state entities that are favorable to a political party or politician

- Use of government communication services (post, email, websites) to communicate with voters in a way that amounts to campaigning

- Campaigns aimed at an international market which theoretically are meant to bolster the image of the country, but which, in practice, focus on increasing international support for the regime

Many other issues could be addressed but will not be here in the interest of space. For example, Transparency International Armenia noted that much of the abuse of administrative resources in the 2007 parliamentary elections was carried out not by state institutions themselves but by external actors with connections to the state machinery.[143]

Criteria for judging when abuse has occurred

A common problem in efforts to monitor abuse of state resources is to judge when an abuse has occurred, and which of the potential violations detected should be included in a report, and which should be emphasized the most. It is especially important to determine where there is a pattern of similar abuses occurring in various parts of the country.

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[138]   Transparency International Georgia (2012) pages 8-13.
[139]   See, for examples, IFES (2009) page 39 and Hoktanyan (2008), page 9.
[140]   IFES (2014b) page 1.
[141]   Transparency International Georgia (2020b) pages 9-15.
[142]   Such activities will often be exceedingly difficult to monitor, but this was shown, mainly by a series of interviews, to have happened in Poland in the 1990s. Walecki (2009) page 6.
[143]   Hoktanyan (2008).

Credibility of information

One approach is to consider how credible the available information is. A case where a court of law has punished someone for abusing state resources should be considered more credible than a case where a person from one political party expresses a vague claim that another party has abused state resources, but offers no details and there are no witnesses.

The table below shows one idea of how cases could be ranked according to the credibility of the information received. There can be different interpretations of such rankings, and each CSO is free to develop its own. Establishing a ranking of this kind serves two purposes. Firstly, it can be used to determine which cases should be included in a report (a cut-off point can be placed wherever it is considered relevant), and potentially to help order the cases included (putting more credible cases first to persuade the reader that you are not merely peddling rumors is helpful). Secondly, a ranking of such as the one below can help clarify how cases can be followed up on to make them more credible (for example, by interviewing witnesses or asking involved persons to comment).

TABLE 10. EXAMPLE OF RANKING OF CREDIBLE INFORMATION VERIFYING CASES OF VIOLATION

Ranking of credible information	Comment
A court of law has convicted a person of abuse of state resources	Remember that the legal system may not be unbiased – people may be convicted of abuse for political reasons, and people actually guilty of abuse may not be convicted (also consider the appeals process)
The person accused of committing an act admits to having done so (though the person may deny that this constitutes a violation)	An act not currently banned by law may be seen by the monitoring group as a violation
Video, audio or photographic evidence exists of the abuse	This evidence must, of course, be available to the monitoring group – consider including it in the report
A monitor from the monitoring group or a partner organization personally observed the act	Further support may be sought to prove to others what was witnessed (such as seeking other witnesses or taking pictures)
Several witnesses confirm that the act took place	Ideally the witnesses should not be connected to another political party
Claim by non-partisan person that act occurred, at least one independent witness confirms	Consider seeking further verification
Accusation by person from a competing political party, accused person denies act	Could other persons verify if the act took place?
Vague accusation made by person from a competing political party, without specifying person involved in abuse or giving details	Given the situation, it may not even be worth the effort of the monitoring group to follow up a case of this kind, if the source cannot provide details

Compliance with existing legislation

In monitoring abuse of state resources, it is not necessary to limit the work to what the law in the country defines as abuse, since it may be argued that certain forms of activities *should be* made illegal, even if they are not regulated at present (see page 43). This in mind, any monitoring project should define what it sees as violations, taking inspiration from the discussion at the beginning of this chapter. Expect to come across a grey zone however, and consider what activities

clearly constitute abuse of state resources. For example, if a school principal suggests to a teacher during a coffee break that party X is the best, it may not be worth including this in a report. But a case where the principal tells teachers they will be fired if they do not vote for party X would certainly be worth including (assuming the information is credible).

Nature of the activity

For certain types of abuse that support a government party or parties, it can be very valuable to further define the criteria used in determining when a given activity is classified as abuse of state resources. *Especially in relation to financial and regulatory resources,* it can be useful to consider three criteria that must be present for the action to be deemed an abuse of state resources (no one of them is sufficient on its own):

Criteria 1. The activity sheds positive light on the government and therefore on the government party

It is very unlikely that a decision to cut pensions or reduce the salaries of public employees can be presented as abuse of state resources, but increases in pensions or salaries could be. The key part of this criteria is that the activity is likely to increase the popularity of the government, and consequently of the party or parties in power.[144] The logic behind such activities is that voters are likely to make a connection between how they see the performance of the government and their view of the party or parties in power.

Many of the types of activities likely to comply with this criteria are discussed on page 50 in relation to public spending. Also, other activities that are not directly related to spending, such as announcing a new national holiday, could be argued that they present the government, and so the party or parties in power, in a positive light. This in itself would not be sufficient to show abuse of state resources, which is why the next two criteria are important.

Criteria 2. The activity happens close to elections

It is difficult to make a case that an activity that happens two years before an election should be seen as an abuse of state resources for electoral purposes. The longer before an election an activity happens, the less likely it is for a monitoring group can make it clear to readers that it was an abuse of state resources for electoral purposes. In general, three months can be used as a cut-off point, unless there is a particular reason to make this period start earlier (this could, for example, be related to the length of the official campaign period, if any).

Of course, it is not only important if an activity takes place ahead of an election. It must also be taken into consideration if that activity has taken place earlier. That is the subject of the third criteria.

Criteria 3. The activity has not happened in recent years, or if it refers to a regularly occurring event, it has not happened in this way recently

Finally, to show that a particular activity does not occur regularly but has only happened ahead of an election, or that spending in a particular area increased specifically ahead of an election (and not at other times) is the third criterion.

This is an essential criterion, not least since when political actors reject claims of abuse, they often focus on this criteria – arguing that the activity in question is part of their regular activities. A former mayor in Georgia once responded to a claim that state resources had been abused by saying that "Should we suspend pensions, stop bus service, cancel garbage pickup, and shut down the kindergartens whenever there is an election approaching, just because those efforts are popular? That would be a very odd notion of democracy."[145]

The mayor was correct in that such activities should not have to cease ahead of elections. To overcome objections of this kind, groups monitoring abuse of state resources therefore have to prove that there have been increases in pensions or bus services, or new kindergartens being opened (or other activities throwing a positive light on the government (criteria 1), shortly ahead of elections (criteria 2) in a way that did not happen in earlier years or previous non-electoral periods (criteria 3).

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[144]   This criteria becomes complicated if there are some partners in a government coalition that have announced or are planning to run against other government partners in upcoming elections.
[145]   Civil.ge (2010).

Regularly occurring events can be, for example, university admissions and increases in road maintenance spending after each winter. For financial resources, these criteria may apply if the amounts spent are significantly higher than in previous years, without there being a reasonable explanation or the amounts being clearly budgeted. Wherever there may be suspicion that an activity or an increase in spending is part of a regularly occurring pattern, the monitoring organization should provide data to show that this is not the case.

If an activity can be presented as designed to show the government in a positive light, it is carried out shortly before an election and has not been done in the past, an argument could be made that an abuse of state resources has been committed. However, this is different from showing that there has been a legal violation, or even a violation of an international commitment. Nor does such a case necessarily support a call for legal reform. It may be a case where the monitoring organization may wish to argue that a certain activity is unsuitable in a democratic process, and that political actors should refrain from such actions (see the discussion on page 43).

As an illustration, the OSCE/ODIHR Election Observation Mission to the 2021 elections in Albania found that

> The Prime Minister also inaugurated several major infrastructure projects during the campaign period. These types of events provided the SP with a significant advantage, which was already reinforced by the dominance of the SP in the local administration. In addition, public employment increased significantly in the lead up to the elections, in the period immediately preceding the moratorium on authorisation of new employment in the public administration.[146]

Estimating the financial value of abuse of state resources

It may be useful to estimate the value of the public resources spent on a particular election. However, since abuse of state resources is in some form illegal or illicit regardless of the amounts spent, and since the monetary value of abuse of state resources is not necessarily related to the impact of these activities on the quality of a particular election, the monetary value can be considered less important.

Nevertheless, it can be valuable to make an estimate of the amounts that have been distributed or used to illustrate the magnitude of the abuse of state resources. For example, the monitoring by a local consortium of CSOs in Mongolia showed that in the 2004 elections the estimated value of the state resources being abused was twice that of the officially recorded campaign spending.[147] Showing voters how much of their tax funds are "wasted" on abuse of state resources may help in mobilizing them to act against such practices, and including a figure can increase the probability that media will report on your monitoring findings.

Putting a price tag on state resources other than those that are purely financial can be difficult though, and only counting spending on new projects or increases in pensions can underestimate the amounts used, if for example it ignores how thousands of public employees were forced to participate in campaigning. In addition, the timing of building a new hospital shortly before an election may be a form of abuse of state resources, but this does not necessarily mean that the entire cost of the hospital should be included as the cost of abuse of state resources.

When designing a CFM project that includes a focus on abuse of state resources, you should consider whether estimating the value of state resources abused increases the probability of reaching the identified desired outcomes. The project team must be ready to defend any estimates that are published, so it is essential that they are calculated using credible information.

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[146] OSCE/ODIHR (2021) page 16.
[147] Open Society Forum et al (2004) page 39.

Monitoring vote buying

Focus of this Section: Show the complexities of vote buying and challenges in monitoring it effectively. Explain how different groups have monitored voter buying.

Content of this section:

- Introduce vote buying and its various forms
- Highlight difficulties in monitoring vote buying
- Approaches to monitoring vote buying in past CFM projects

Why is vote buying important and why is it difficult to monitor?

Democracy requires open regular elections where the voters freely decide who to support and cast their vote for without undue interference. The buying of votes is considered a major violation of the democratic nature of an election, which is reflected in the fact that at least 97% of all countries in the world that hold elections have bans against such activities.[148] However, unfortunately, vote buying is nonetheless widespread: in a project monitoring campaign finance in the 2007 Kenyan elections, over 75,000 cases of "vote buying and voter bribery" were detected, with more than a quarter of these cases reported during the candidate nomination period.[149] Similarly, the OSCE/ODIHR Election Observation Mission to the 2021 elections in Albania found that "widespread practices of votebuying, as alleged by many IEOM interlocutors, remained a problem", and that "[s]ome 30 criminal investigations of vote-buying and some 50 criminal cases on other irregularities were initiated in relation to the 2021 elections".[150]

Vote buying is a complicated issue. There are many discussions surrounding how it should be defined and understood both in law (*what exactly should constitute as buying a vote?)* and within the context of the political process (the relationship between political leaders and their supporters), and many attempts have been made to measure its use and impact.[151] Regarding the legal provisions against vote buying, issues to be considered include whether receiving vote buying gifts (vote selling) should be criminalized, whether gifts by others than electoral contestants should be banned, and to what extent promises rather than actually given gifts should be considered parts of vote buying.[152]

When most people hear "vote buying", they presumably think of politicians handing cash or goods to potential voters, with the often-explicit understanding that the voter will vote for the politician or her/his party. This can be called "transactional" vote buying, a quid pro quo exchange.

There are, however, numerous disadvantages to this approach from the perspective of corrupt politicians. They need to know who individual voters cast their vote for to ensure the corrupt investment pays off, by, for example, requiring them to take a picture of their ballot paper with a mobile phone.[153] The politician must also either have direct contact with each voter or rely on intermediaries for carrying out the transactions.

Another approach can be thought of as *non-transactional*, *normative* or perhaps as *communal* vote buying. Instead of relying on direct transactions between corrupt politicians and voters, this strategy is rooted in largesse distributed ahead of elections, with the often-implicit understanding that this largesse will continue if, and only if, the people in the community vote for the corrupt candidate.

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[148]   Data taken from International IDEA (2022), as of February 2022. Data was found for the question about vote buying regarding 172 countries.
[149]   Coalition for Accountable Political Financing (CAPF) (2008) page 47.
[150]   OSCE/ODIHR (2021) pages 2 and 3.
[151]   For an excellent discussion about the concept of vote buying, see Schaffer and Schedler (2005).
[152]   See IFES (forthcoming).
[153]   A variant of such vote buying involves the buying of voter ID cards, which corrupt candidates can use for fraudulent voters to vote in the "right way". See, for example, Leadership (2020).

This approach has several advantages for the corrupt candidate. For one, they do not need to know how any individual voter votes – it is enough to check how the people in the polling station voted, and this, of course, is part of the official election results. If the people in the village or the part of town voted for the politician, the politician will pay to fix the dilapidated road, repair the school or build a health center. If they voted for someone else, none of this will happen. The money can either come directly from the politician's private funds or from public resources under the politician's control. In the latter case, we must acknowledge the blurry line between vote buying and more traditional campaign promises (should the statement "if I get elected, I will personally make sure that no-one in this constituency goes hungry" be seen as a campaign promise or vote buying?).[154]

Communal vote buying is closely related to the notion of clientelism or patronage relationships, and systems of this kind have proven pervasive in many situations. Although there is no universally accepted definition of clientelism, it has been well described as a:

> ...complex chain of personal bonds between political patrons or bosses and their individual clients or followers. These bonds are founded on mutual material advantage: the patron furnishes excludable resources (money, jobs) to dependents and accomplices in return for their support and cooperation (votes, attendance at rallies).[155]

While clientelism can, in some cases, function as a support system while the state is not functioning (by, for example, providing basic health and education services when the state is unable or unwilling to do so), such systems also tend to undermine efforts to actually make the state work as it should and deliver necessary services to the people.[156] There are also indications that vote buying may be especially targeted towards, and be more effective in targeting, voters with extensive social networks.[157] Campaign finance monitoring in Serbia in 2022 indicated that "...socio-economically vulnerable groups are most exposed to such clientelist methods, which, as noted, are used almost exclusively by the ruling parties...".[158]

Unfortunately, vote buying is notoriously difficult to monitor "as both sides in the transaction usually go to great lengths to conceal it."[159] Many international election observation reports include variations along the lines of "there were reports about vote buying, but we were unable to verify the accuracy of these reports". Such a statement is essentially a failure (though admittedly often understandable) – readers are given no information whether this potentially very damaging practice was occurring or not.

Approaches to monitoring vote buying

Using surveys to establish the extent of vote buying
Estimating the extent of vote buying is often exceedingly difficult. Groups in different countries have used surveys to gather information about the experience of vote buying.

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[154] There is however a difference between the campaign promise "if I get your vote and am elected I will make sure that the road to the village is repaired" from the vote buying statement "if I get your vote and am elected, I will make sure that the road to the village is repaired, but if I don't get your vote and am elected anyway, you can forget about the road being fixed." Admittedly, vote buying statements tend to be a little more subtle than this, but sometimes not much. CFM projects addressing vote buying are well served by developing a definition of what forms of promises by contestants they would consider to be vote buying.
[155] Brinkerhoff & Goldsmith (2002) page 2. For a discussion of clientelism concepts, see also Hicken (2011).
[156] For an interesting discussion about the concept of clientelism, based on field research in Indonesia, see Berenschot (2018).
[157] Cruz (2019).
[158] CRTA (2022) page 7.
[159] Open Society Justice Initiative (2005) page 16.

TABLE 11. REPORTED FREQUENCY OF VOTE BUYING IN DIFFERENT COUNTRIES

Country	Year	% offered money	Sample size	Comment	Source
Algeria	2013	**3%**	1,206	-	Muhtadi (2019) page 62.
Argentina	2010	**18%**	1,410	-	Muhtadi (2019) page 62.
Armenia	2003	**75%**	650	Phone survey conducted randomly all over the country. Shows those "offered" a "bribe"	Center for Regional Development and Transparency International Armenia (2003) page 2.
Armenia	2012	**2%**	1,000	Phone survey, not entire country. Shows shares "given" money	Transparency International (2012) pages 3-4.
Brazil	2001	**7%**	N/A	Methodology not known	Pfeiffer (2004) page 76
Indonesia	2014	**33%**	1,200	Comparable results to survey in 2009	Muhtadi (2019) page 50.
Lebanon	2009	**26%**	N/A	Part of list experiment, see below	Corstange (2010) page 13.
Madagascar	2013	**13%**	1,200	-	Muhtadi (2019) page 62.
Maldives	2014	**20%**	1,063	In-person survey	IFES (2014a)
Nicaragua	N/A	**3%**	N/A	Part of list experiment, see below	Gonzalez-Ocantos et al (2012) page 204
Niger	2013	**24%**	1,200	-	Muhtadi (2019) page 62.
Philippines	2019	**10%**	1,200	Question to respondents was if they had "witnessed vote buying"	CNN Philippines (2019).
Trinidad & Tobago	2010	**5%**	1,503	-	Muhtadi (2019) page 62.
Uganda	2012	**40%**	2,400	-	Muhtadi (2019) page 62.
Uganda	2016	**34%**	1,200	Data collected in 2019	Kakumba (2020) page 2.

There are indications, however, that vote buying is significantly more common than the data in Table 11 indicates. For example, in Brazil vote buying has been identified as one of the primary areas of electoral mismanagement in the country, though less than 10% of survey respondents reported having been offered a bribe.[160]

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[160]   Gonzalez-Ocantos et al. (2010) page 204. See also Corstange (2010) page 13.

One reason for this discrepancy may be because vote buying is considered societally undesirable. Apart from being illegal in most countries, people may be reluctant to admitting having been involved or even witnessing it. In a test case in Nicaragua in 2010, researchers found that only 3% of respondents admitted to having received a gift in the 2008 elections when asked the question directly. However, when a list experiment was used to remove the "stigma" of the question, a quarter agreed to having been given a gift or favor.[161] In a similar experiment in Lebanon after the 2009 elections, 26% of respondents admitted that having been offered vote buying influenced their vote. When a similar list experiment was applied however, this figure rose to around half.[162]

Groups interested in using surveys to measure the extent of vote buying should carefully consider the potential shortcomings of this approach.

Studying attitudes and forms of vote buying

Surveys can also be used to monitor *attitudes* toward vote buying, both among those giving and receiving gifts. For example, Transparency International Armenia conducted a telephone survey after the 2003 elections. They found that 75% of a random selection of Yerevan citizens had a bribe offered to them or a friend or relative in relation to the election campaign.[163]

As vote buying can take many different forms, it is important to study not only *if* vote buying is taking place in a country, or even *how common* it is, but also *what forms* of vote buying take place. This information is necessary for designing effective legal reform, implementation efforts and public awareness campaigns against vote buying.

For example, the Armenian telephone survey mentioned above indicated that half of those who had been offered bribes indicated that it had been in the form of cash (with 26% answering goods, 11% services and the rest declining to answer). It also showed that offers of vote buying came slightly more often from political parties than from individual candidates.[164]

Monitoring vote buying as part of campaign spending monitoring

As it is illegal, vote buying is not part of the campaign expenses monitored by the Parallel Expense Monitoring (PET) methodology described in Chapter 3, since it would not appear on official campaign finance reports and because establishing costs for vote buying is often exceedingly difficult.

Even so, the regular monitoring of campaign events and other campaigning activities can also be used to monitor cases of potential vote buying. This can include items of value being handed out during campaign events (or during public institution events if this is done in favor of a particular party or candidate). Whether monitors should receive gifts from contestants to prove that such vote buying exists in practice should depend on whether the reception of such gifts is in itself illegal (for the monitor's security), and on potential risks for the monitoring project if it is made public that its monitors have accepted gifts.[165]

The handing out of gifts to voters may be especially prevalent in emergency situations, such as during the COVID-19 pandemic. As part of its monitoring, the Serbian CSO CRTA "recorded 150 cases throughout Serbia in which party activists distributed humanitarian packages to citizens, undertook work and other types of

> The handing out of gifts to voters may be especially prevalent in emergency situations, such as during the COVID-19 pandemic. As part of its monitoring, the Serbian CSO CRTA "recorded 150 cases throughout Serbia in which party activists distributed humanitarian packages to citizens, undertook work and other types of actions that do not pertain to the scope of regular political activities."

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[161]   Gonzalez-Ocantos et al. (2010) page 210f. The list experiment worked so that one randomly selected group of respondents was shown a list of electoral violations including vote buying and another the same list without vote buying, and then asked to answer how many of these types of violations they had experienced. A judgement on the share of people who had experienced vote buying was arrived at by comparing the responses by the two groups.
[162]   Corstange (2010).
[163]   Transparency International Armenia (2004) page 2.
[164]   Transparency International Armenia (2004) page 2 - 3.
[165]   In a forthcoming study of vote buying regulations in 141 countries, IFES shows that receiving gifts, or "vote selling" is illegal in around 30%. IFES (forthcoming).

actions that do not pertain to the scope of regular political activities."[166] Admittedly, such activities had also been observed during the period before the pandemic took hold in Serbia.[167]

Political parties and candidates may also report activities on their social media accounts that could be considered vote buying. This could refer to items or money that have been distributed by a contestant to voters, or to promises that the CFM project defines as vote buying (see footnote 154).

Discussing whether placing price tags on different forms of vote buying is common for groups interested in monitoring vote buying. Vote buying is illegal in itself regardless of the amount exchanged (physically or intangibly), though it can be valuable to illustrate the extent of such abuse. It may be possible to attempt to establish the value of vote buying using data from field monitors or from reports received by the public, but remember that such estimates will be "very rough" at best, and that in some cases the vote buying may consist of promises on which it is very difficult to put a price tag.[168] While estimates of spending on vote buying may be added to other monitored campaign costs to give an estimate of the "real" costs of campaigns, vote buying estimates should be excluded when comparing monitored expenditure with spending reported by contestants, as the illegal nature of vote buying means that we should not expect such reports to be included.

Hotlines and anonymous reporting mechanisms
CSOs interested in monitoring vote buying should consider what methods they can use to collect information about this often hidden practice. This can include using hotlines and online tools for anonymous reporting of cases where voters have been given or offered gifts that may constitute as vote buying. Given the sensitivity of vote buying, efforts of this kind are unlikely to be successful unless users are permitted to be anonymous, though they should be given the opportunity to provide supporting information such as photos or videos. The same considerations regarding validity and credibility of data collected through other forms of crowdsourcing (see pages 34 and 48) also apply in this regard.

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[166]   CRTA (2020b) page 40.
[167]   CRTA (2020a) page 19.
[168]   Open Society Justice Initiative (2005) page 82.

Monitoring hidden media advertising

Focus of this section: Discuss the concept of hidden advertising and why it is worth including in CFM projects.

Content of this section:

- Introduce the concept of hidden advertising and its importance for campaign finance
- Approaches to monitor hidden advertising

What is meant by hidden advertising

Media attention other than official campaign advertisements, where a political party or candidate is indirectly favored by an online outlet, newspaper or radio or television station, is another form of campaigning those interested in monitoring campaign finance should consider.

Such media activities are often referred to as "hidden advertising," and while there is no universally accepted definition, in this guide we consider hidden advertising as "biased reporting and indirect campaigning in favor or against a certain electoral contestant." This can include cases where a media outlet explicitly urges people to vote for or against a certain party or candidate, but normally the approach taken is subtler. For example, a particular electoral contestant may be given more media attention than others without due reason, or their activities may be reported on in a more positive light (in Ukraine, this type of media activity is sometimes referred to as *jeansa*[169]).

Some examples are provided by the Latvian CSO Providus;[170]

> Homogeneity or lack of criticism in the material (for example, a news story lacks significant information, the opinion of the involved parties or critical approach to the source; in interviews only pleasant or unpleasant questions are asked and other criteria).

> The story is printed without any other obvious reason than just the promotion or calumniating [sic] of a party or a particular politician (in the media a particular political party or a politician often appears in a positive or negative context; there is information about the everyday life or other activities of the politician unrelated to politics, as well as other criteria).

Hidden advertising may be particularly common in contexts where media outlets are particularly financially exposed. A report regarding Tanzania found that:

> According to the Media Council of Tanzania, embedded journalism was common, with reporters accompanying parties on the campaign trail, making them beholden to those they followed. Politicians were accused of 'buying' airtime and favourable coverage in the run-up to the elections, which were then dubbed as 'harvest season' by media owners: a time for making money.[171]

The reason that hidden advertising may be relevant to include in a campaign finance monitoring effort is that such advertising may be paid for or may constitute an in-kind donation to an election campaign (at least in practice, though not necessarily according to the legislation of a country). Hidden advertising can also have longer-term implications, like creating links between politicians and media outlets, and spreading to areas like licensing provisions and public procurement contracts. Monitoring hidden advertising can thereby be a way of exploring the full picture of campaign finance in a country.

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[169]   EuroMaidan Press (2018).
[170]   Providus (2001).
[171]   Casserly (2015) pages 3-4.

When considering hidden advertising, it is important to separate private media from publicly controlled media. In the case of publicly controlled media, hidden advertising would constitute abuse of state resources. This is not the case for private media, though there can be an indirect connection, as many countries' private media outlets require government licenses to operate, and pressure can be put on media outlets to alter their reporting in order to receive or maintain their license to operate.

Much of the previous work on hidden advertising has focused on traditional media (in particular, on broadcast media). Much research remains to be done regarding hidden advertising in online media, including social media content by influencers. In most countries, influencers on YouTube, TikTok, Instagram and other platforms are normally free to spend as much time as they wish praising a certain contestant, and this would seldom be regulated. An exception could be if a contestant pays an influencer to act on their behalf. The contestant may be required to report on such expenses, and that the influencer may be required by separate legislation to clearly indicate paid content. Though it is seldom explicitly stated in legislation, it can also be argued that in certain situations, influencers publicly advocating for certain contestants can be seen as providing an in-kind donation, and such activities may therefore be required to be reported.[172]

Approaches to monitoring hidden advertising

Monitoring something that is often illegal can be particularly challenging, and you should consider if this is relevant and safe in your country and political context.

Proving that a case of hidden advertising has occurred in a way that can be used in court is often very difficult. More often you will be using a credible and objective approach to show your target audience that such hidden advertising (and manipulation of public opinion) has occurred.

In its 2006 monitoring project that focused exclusively on hidden advertising, the Latvian CSO Providus used the criteria included in Table 12 below. The text in Table 12 is taken from Providus (2005), page 8.

TABLE 12. CRITERIA FOR MONITORING HIDDEN ADVERTISING

Criteria for monitoring hidden advertising
Appearance of a party or a deputy candidate logo, pictures or symbols that are not connected with the specific report or article.
Appearance or mentioning of a party or a deputy candidate without an obvious reason and which does not correspond the interests and needs of the media audience. 1. Pseudo-events. An event created by media or PR that does not have a real socio-political importance, which is created in order to obtain publicity for a deputy candidate or a party in media. (Including events in the personal life of a deputy candidate.) 2. Appearance that is not relevant to the event depicted. 3. A deputy candidate is used as the main/only commentator of an event. (It is not explained why exactly this deputy candidate is considered the best commentator of the event)
Repeated publication or running of a report or article with the appearance of the deputy candidate. (Inclusive of the time that is not allocated in the programming or a program where the contents are not clearly defined. This applies only to TV and radio.)

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[172] In such cases, it would be very important to consider the line between free speech and in-kind donations in the form of publicly stated and broadcast messages of support.

Criteria for monitoring hidden advertising

Opinions of the involved party/parties are missing or there has not been an attempt to clarify the opinions of the involved party or a deputy candidate, or the opinions expressed by a party or a deputy candidate are missing. It is not explained in the report that there has been an attempt to clarify the opinion of any of the involved parties, but it has not been successful.

Similar opinions are selected, opinions and balanced quotations from deputy candidate or a party are missing, or the opinions expressed by deputy candidates are selected to enhance or diminish the popularity of a party or a deputy candidate. Inclusive of articles or reports that were created "In cooperation with…"

A journalist without asking specific questions lets the deputy candidate to express his/her opinion freely and to choose the theme and direction of the discussion, or a journalist is asking a similar type of questions in order to enhance the positive characteristics of the personality of the deputy candidate.

An open invitation is expressed by the journalist to vote "for" or "against" the candidate list or a deputy candidate (report that is not identified as a commentary)

Identification "paid political advertisement" appears only at the end of the report or article and is proportionally significantly smaller or unnoticeable then the usual titles or print. Including cases when the article or the information provided about the party or deputy candidate is found in the traditional columns that are not relevant to the depiction of political processes.

Monitoring hidden advertising can provide very valuable information and give a more coherent view of the campaigning ahead of an election. You may however want to resist the temptation to put a price tag on hidden advertising that has been provided. First, there is the fact that we can often not say if a case of hidden advertising has been paid for by the political actor, or if it was provided as an in-kind donation by the media outlet (which may wish to gain some post-election benefit). Apart from that, what is the value of a politician appearing for 20 minutes on television without "obvious reason", and how much is it worth if a candidate's view is "enhanced" compared to that of others? This is not an argument against monitoring hidden advertising, only against attempting to put a value on how much hidden advertising is worth.

Monitoring the work of the political finance oversight institution

Focus of this section: Why CFM projects should consider monitoring public institutions with a mandate to oversee compliance with political finance regulations.

Content of this section:

- Why the role and activities of the political finance oversight institution are important, both relating to effectiveness and potential bias
- Activities by political finance oversight institutions you may consider monitoring

Most of this guide deals with monitoring the activities of people who are involved in election campaigning, either as contestants (party officials, candidates and their supporters) or in some other way (including non-contestant campaigners and public officials engaged in the abuse of state resources).

Another actor that is covered by most CFM projects is the political finance oversight institution, in other words, the public institution that has a legal mandate to receive financial reports and oversee compliance with political party and campaign finance regulations. This is normally either an election management body, an auditing institution or an anti-corruption agency, though there are a lot of different solutions, and in some cases the oversight mandate is split between different institutions. Whatever the setup, this institution(s) will be tasked by legislation to oversee compliance with campaign finance regulations by contestants and, in some cases, by non-contestants.

Monitoring the work of these institutions can be essential for the CFM project to aim towards the long-term goals of the project, addressing the identified campaign finance problems and achieving the desired outcomes. Whatever the CFM project is designed to achieve, it is likely that the political finance oversight institution has a central role to play, whether you see it as a potential partner in your monitoring of campaign finance or as a major obstacle to political finance transparency, control and accountability. It is important to analyze and understand the legal framework of this institution(s), to realize the "reality" and the framework for their work. However, a review of the political finance oversight institution must not be limited to the legal situation, as that seldom gives a full idea of the work of such institutions.

Two key issues you may consider monitoring are if the institution(s) is active and effective in campaign finance oversight within its mandate, and if it is showing signs of bias in its implementation of the regulations.

Regarding *effectiveness*, it is important that you familiarize yourself with the regulatory framework and what is and what is not within the mandate of the institution. There is often little point (or even a detrimental impact) in criticizing an institution for not doing something that it is not contained in its legal mandate. If you wish to change or expand the mandate of an oversight institution, you will normally need to turn to parliament to advocate for a legal amendment to this effect.[173] In doing this, you need also to consider the overall administrative process in the country to ensure that your demands are reasonable and sustainable in the country's context. However, monitoring effectiveness also entails monitoring if the institution actively seeks to implement its legal mandate. This relates to the prevalence of institutional proactiveness, such as timely and quality communication and informing the public about the authority and decisions of the institution.

Regarding *potential bias*, it is important to monitor if the oversight institution engages in any behavior that particularly targets or benefits a particular political party, candidate or other actor. If the oversight institution fails to act against the government party, this is not in itself evidence of bias if the institution also fails to act against other political forces. If, however, campaign finance sanctions are exclusively imposed on opposition actors while the government party/parties

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[173]   In relation to abuse of state resources, see more on this issue on page 42.

are not sanctioned although they engage in similar violations, this can be seen as a form of abuse of enforcement resources (see page 60).

If you intend to monitor the campaign finance oversight institution, you should make sure to engage with that institution in advance, so you can ask relevant questions and collect all information that is relevant for your monitoring.

Table 13 shows different activities of public oversight institutions that may be worth monitoring, with comments about considerations relating both to the effectiveness and potential bias in the oversight.

TABLE 13. PUBLIC OVERSIGHT INSTITUTION ACTIVITIES TO MONITOR

Activity	Effectiveness considerations	Bias considerations	Comment
Institution issues, regulations and procedures as required and suitable	Without regulations it can be difficult or impossible for political actors to comply	*Indirect – consider if a lack of implementation may benefit a particular actor. Analyze if regulations and procedures benefit any actor.*	There can be many reasons for a failure to issue regulations/ procedures – ask the institution why they have not done so.
Institution provides guidance to political parties and candidates	Without guidance it can be difficult for political actors to comply	*Indirect – consider if a lack of implementation may benefit a particular actor.*	Make sure that you have access to all guidance materials that the institution has provided.
Institution acts upon received complaints or information	Given the often-limited capacity that oversight institutions have to carry out their own monitoring, failure to act on received complaints can significantly undermine effective oversight.[174]	Does the institution only act on complaints against certain political actors and not others?	Make sure that you are well aware of the mandate of the institution to receive and act on complaints. Analyze if the institution has a clear process for receiving and acting on complaints, including a functioning case management system.[175]
Institution pro-actively acts against potential violations	If the institution does not take a stand, for example, against emerging information of vote buying, oversight effectiveness may suffer	Does the institution only act against certain political actors and not others?	Again, you need to be familiar with existing regulations and the mandate of the oversight institution

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[174]   In the (comparatively rare) cases where public oversight institutions carry out their own monitoring, it can also be worth observing how such institution does monitoring, to assess the monitoring methodology used.

[175]   Note that actors may seek to overwhelm the oversight institution with frivolous complaints.

Activity	Effectiveness considerations	Bias considerations	Comment
Institution reviews financial reports and detects inaccuracies	Reviewing financial reports is often the main way oversight institutions detect violations. Analyze if glaring omissions or errors are detected and acted upon.	Does the institution only review and act upon the reports from certain political parties or candidates?	The approach of the oversight institution is particularly important in cases where many political parties and/or candidates participate in an election.[176]
Institution acts against abuse of state resources[177]	Abuse of state resources is in many countries an important part of campaign finance. In some cases, the official income and spending of the government party/ parties is lower than that of the opposition, for the simple reason that the former relies on state resources.	Does the institution take steps to prevent, detect and/or sanction abuse of state resources? Failure to engage with this issue can indicate political bias (though it may also be the result of a lacking mandate, resources or political will).	Note that in many countries, the institution mandated to oversee party and campaign finance has no mandate to monitor compliance with rules against the abuse of state resources
Institution imposes or initiates sanctions against violations	While sanctions are not the end goal of campaign finance regulation (compliance is better), a system where no sanctions are enforced is likely to be an ineffective one.	Does the oversight institution only impose or initiate sanctioning procedures against some parties and candidates?	Note that the sanctioning mandate varies significantly between countries. A lack of sanctions being imposed is not in itself evidence that the oversight institution is incompetent or politically biased.

With the exception of cases where the public campaign finance institution is entirely biased, corrupt or ineffective, your organization and your CFM project should seek to build a relationship with this institution. Doing so can be important not only in providing data for your CFM project, but also in working towards the goals and desired outcomes that you have established. You may even be able to assist the oversight institution in making its oversight more effective.[178]

It is important for the democratic process not to blur the line between public institutions and civil society groups (see page 3 for further detail). You should remain free to credibly criticize the oversight institution if you feel that it is acting ineffectively, and especially if it displays political bias in its enforcement, at all times.

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[176]   In such cases, it is important that the oversight institution uses objective criteria to direct its limited resources to review the financial reports of the most relevant political actors. Winning candidates and political parties that gained seats in elected bodies should normally be reviewed before also-rans and political parties that only gained a handful of votes. Other objective criteria can include the amounts of money that an election campaign raised or spent, and whether there has been a history of the party or candidate violating campaign finance regulations.
[177]   See further *Monitoring abuse of state resources.*
[178]   The issue of whether and when CSOs should report detected potential violations to oversight institutions is complicated and will not be discussed here. Naturally, CSO activists interested in political finance transparency will wish to use the information they have gathered against impunity in political finance violations. At the same time, the different roles of civil society and public oversight need to be considered (see above).

CFM and gender

> Focus of this Section: Establishing the importance of including gender in the monitoring of campaign finance, and exploring how this can be done.
>
> Content of this Chapter:
>
> - The importance of a gender angle for CFM
> - How to adopt a gender-sensitive approach to CFM
> - Areas of analysis for a gendered CFM project

Why gender is an important consideration for CFM

Democracy requires the involvement of all members of society, including members of ethnic and linguistic minorities and people living with disabilities. The largest group in many societies that faces systemic and systematic discrimination in the political process are women.[179]

Research is increasingly highlighting the connection between gender and money in the politics and the electoral process.[180] As one study stressed:

> There are many factors that contribute to existing gender inequalities in politics. One of the most commonly discussed issues is a lack of access to the funding necessary for women to successfully run for elected office. However, while political finance is an important instrument for achieving gender equality in politics, the ongoing debates about political finance rarely consider the impact of money on the level of representation of both men and women in elected offices. Additionally, discussions about women and men in politics seldom focus on financial issues in any depth.[181]

In not including the gender angle from monitoring campaign finance you risk missing important aspects of the role of money in the political processes and the impact of political finance on society. Considering the gender aspects of campaign finance can add significant nuances to the analysis and provide a more complete picture of the situation in a particular country. For example, since most incumbent members of parliament are men (74% as of mid-2022), and abuse of state resources generally favors incumbents, it is reasonable to assume that such abuses have a disproportionately negative impact on women participating as candidates in elections.[182] In addition, since women globally earn on average 24 percent less than men, the more election campaigning focuses on resources, the more disadvantaged women are likely to be, both in competing for the nomination of parties in winnable electoral areas and in election campaigns.[183]

It is also important that the monitoring project itself be designed so that it helps to break down gender barriers. This can include ensuring a gender-balanced monitoring team, or including women in leadership roles within the monitoring project.

How to adopt a gender-sensitive CFM approach

So far, few groups monitoring campaign finance have adopted a gender-focused approach or have carefully considered the impact of the monitored results on women and men. The manual on campaign finance monitoring by

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[179]   While this section focuses on applying a gender perspective to campaign finance monitoring, similar discussions can assist in ensuring that the monitoring consider issues such as inclusion of persons with disabilities, LGBTQI persons and ethnic, linguistic and national minorities, among others.

[180]   Cigane & Ohman (2014), Murias, Wang & Murray (2020), Ballington & Kahane (2014), Applegate, Kryvinchuk, Ohman & Sydorchuk (2021).

[181]   Cigane and Ohman (2014) page 1.

[182]   Data on gender among MPs from Interparliamentary Union (2022).

[183]   Oxfam (2021).

the Association of American States asks long-term observers to note any "Problems encountered by women in the exercise of their political rights" (though offers no additional detail).[184] Following their monitoring of campaign finance in the 2017 Nepalese elections, Samuhik Abhiyan, a Nepali civil society organization, recommended introducing reporting requirements on income and strengthening the enforcement of campaign finance laws as a means to increase gender equality in elections, though their monitoring methodology did not specifically address gender.[185]

The *Handbook for Monitoring of Election Campaigns in Kosovo* noted complaints "...that parties are not distributing funds to women candidates to run campaigns as the parties are of the view that women candidates will be elected regardless by means of gender quota."[186] The report recommended consideration be given to "...including a provision in the law to encourage political parties to distribute a fair and equal share of funding to men and women candidates," but it did not discuss the relationship between the candidate selection process and campaign finance that presumably underlies such inequalities in the distribution of funds. In other words, parties are likely to allocate more funds to male candidates since the parties are more likely to nominate men than women in electoral areas the party may win, and it is this gender inequality in the selection process that primarily needs to be addressed.[187]

Some examples of issues that can be addressed as part of a gender-conscious CFM initiative are shown in Table 14.

TABLE 14. EXAMPLES OF ISSUES FOR A GENDER-CONSCIOUS CFM PROJECT

Areas of analysis	Comments	Examples
Regulatory framework	A review of political finance regulations that may support or hinder gender equality among candidates. Can include formally "gender-neutral" regulations on elections or campaign finance, as well as regulations aimed at improving gender equality.	Electoral system Donation and spending limits Impact of electoral system on campaign spending Gender-targeted public funding Reduced nomination fees for female candidates
Provisions regarding gender-disaggregated financial reporting	Study if bylaws and reporting forms/templates provide for reporting of income by gender	Do formal requirements include the gender disaggregation of reports? If not, can the CFM project provide such a disaggregation (is the required data publicly available?) Do political parties and candidates receive donations from women and men equally?
Official and observed fundraising and spending by female and male candidates	Review official reports and monitor if female and male candidates raise and spend money equally	How does the officially reported income and spending of female and male candidates compare, especially considering the condition of the parties that these candidates represent? What does monitoring of campaign (income and) spending reveal about the difference between female and male candidates, including during the nomination phase?

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184   Organization of American States (2012) page 55.
185   Samuhik Abhiyan (2018) page 22.
186   Transparency International Czech Republic and Kosovo Democratic Institute (2017), page 18.
187   Ibid.

Areas of analysis	Comments	Examples
Measures by political parties to improve gender equality	Whether political parties have adopted policies or procedures for allocation of resources that consider the gender of candidates	Have political parties adopted policies on the equitable allocation of available resources to male and female candidates? Have political parties adopted policies on the equitable allocation of public funding, including airtime?
Experiences of women and men running for office or in party leadership roles	Conducting interviews with individuals with personal experience of party or campaign activities can add a lot of detail regarding how regulations and the role of money in campaign finance actually function for women and men	Do female candidates experience the need to spend more money than male candidates to persuade selectorates and voters?[188] Do requirements to spend large amounts serve as a special deterrent for women to run for office? What is the view of persons in party leadership positions regarding gender and campaign finance? What is the experience of women and men participating in campaigns (other than as candidates?)
Perceptions among voters of female and male candidates	Through surveys, focus groups, interviews of other means can explore the views of male and female voters regarding gender and campaign finance	Do voters perceive male and female candidates as equally likely to provide for the needs of the electoral area? Do voters perceive male and female candidates as equally likely to engage in vote buying? Do voters perceive male and female candidates as equally likely to engage in abuse of state resources?

An analysis of the regulatory framework around campaign finance from a gender perspective can be a good starting point for adding a gender angle to campaign finance considerations, although this may only give superficial insight into the gender aspects of campaign finance unless the situation on the ground is also analyzed.

First, a regulatory analysis can focus on provisions that are formally "gender-neutral", but which have an impact on how women and men finance their election campaigns. This can include regulations that do not directly relate to campaign finance – for example, a First Past the Post electoral system places more emphasis on individual candidates and by extension on their access to resources, while in a closed-list Proportional Representation electoral system the focus on individual candidates is significantly less.[189] It can also include "gender-neutral" campaign finance regulations such as spending limits, which may advantage female candidates with less access to funds.[190]

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[188]   "Selectorates" in this context is taken as persons who make decisions during the candidate selection process within political parties.
[189]   Ballington & Kahane (2014) page 308.
[190]   Ibid pages 310-312.

An analysis of campaign finance regulations can also consider campaign finance regulations that are specifically designed to reduce gender inequality.[191] One example of such provisions is gender-targeted public funding, with one study suggesting that "there is reason to suspect that gender-targeted public funding may have been one factor" behind reduced gender equality in some countries.[192] Reduced candidate nomination fees for women is another example of how campaign finance provisions can be changed to promote women's political participation. This approach has for example been used in Ghana, although Bauer and Darkwa have described this as just a "drop in the bucket in terms of the costs associated with running a primary or general election campaign".[193]

An analysis of legal provisions should also be complemented by a review of existing bylaws and reporting requirements determined by public institutions. OSCE/ODIHR has stated that, "the provision of sex-disaggregated reports on campaign finance by the oversight body and/or political parties can be helpful in establishing the extent of any disadvantages faced by women in campaign finance. Such data can then be used as a basis for formulating measures to address possible inequalities."[194] Unfortunately, reports are often not disaggregated by gender, and it is recommended that CSOs wishing to monitor campaign finance consider how financial reporting will be gender disaggregated in advance, or what efforts can be made by the CSO to disaggregate the data by gender. For example, in studying the official templates and manuals for financial reporting, is it indicated that donation records must identify the gender of the individuals who make donations? If not, can the CSO set up a system that identifies donors as women or men?[195] Being able to disaggregate donors by gender allows for an analysis of the share of income received by different parties coming from either gender (this will be less relevant where donations mainly come from legal entities, or where political parties depend on public funding). It can also show if female candidates are able to attract donations from both women and men. Beware though that where donation limits exist or where the identity of donors is made public, highly wealthy persons (most often men) may make donations in others' names, including their wives and daughters, so as not to exceed limits or to reduce their own public exposure.

In addition to these approaches, it can be very revealing to compare the spending between female and male candidates, both overall and on specific things. Such comparisons must consider which political parties the different candidates represent. If larger political parties are reluctant to nominate women, then an analysis that only considers gender may find that male candidates spend more than female candidates, but this difference may be because generally candidates from smaller parties tend to have fewer resources to spend. In other words, the monitoring finding would reflect gender inequality in the candidate nomination phase rather than as part of campaign finance (while both issues are interesting, it is important to keep them separate).

To address this problem, the CFM analysis should, if possible, compare the spending between women and men from the same party, coalition or list. When this was done relating to the 2019 parliamentary elections in Ukraine, it surprisingly but interestingly showed that while male candidates spent more money overall than their female counterparts in some parties, in the larger political parties the situation was the reverse.[196]

Even that may not give the full picture though if women are not nominated in electoral areas where they are likely to win; in countries with gender quotas, for example, parties may nominate women in unwinnable seats to comply with the letter (but not the spirit) of the quota regulation. Ideally therefore, an analysis should focus on spending patterns by women and men representing parties in similar positions, and who participate in similar electoral situations. This is easier to do after an election, when both the election results and (hopefully) financial candidate reports are available.[197]

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[191]   Importantly, the Convention on the Elimination of All Forms of Discrimination against Women (CEDAW) stresses that "temporary special measures aimed at accelerating de facto equality between men and women shall not be considered discrimination as defined in the present Convention."

[192]   Ohman (2018) page 69. For an analysis of a similar regulation in Brazil, see Aruda (2020).

[193]   Bauer & Darkwa (2020) page 142.

[194]   OSCE/ODIHR (2015) page 58.

[195]   For example, if the gender of donors is excluded from donor records but the first names of donors are included, it could be possible to use lists of common first names given to women and men to have a computer system disaggregate donors by gender.

[196]   Applegate, Kryvinchuk, Ohman & Sydorchuk (2021).

[197]   An analysis of this kind could be misleading if there is an overall difference in the accuracy of the financial reporting between male and female candidates (in other words, if the candidates of one gender are overall more honest than the others). This is difficult to control for, but some indications can be found by studying gender differences in the submission rates between male and female candidates, in reports being incomplete, and where reported income or spending is just below a legal limit.

The financial assistance provided by political parties to women and men candidates has often been discussed, and OSCE/ODIHR recommends that their election observation missions explore if "political parties [have] introduced fair and transparent procedures for the equitable allocation of public or party financing to women and men candidates?"[198] This notion however assumes that political parties generally have significant funds available to distribute, while in many cases, the parties reversely rely on the candidates they nominate as a source of income. It is therefore essential to establish what funds political parties distributed de facto to their candidates, and to what extent this amounted to a sizeable portion of candidate income. Where the nominating political party is not a significant contributor to the campaign coffers of its candidates, it is arguably more relevant to inquire, as OSCE/ODIHR does, if the party has implemented policies for gender equality in "the allocation of indirect public or party funding, for example, access to airtime and media sources, or use of party premises or resources for campaigning?"[199] Analyses of such assistance from parties must also consider gender (in)equality in the candidate nomination process, as political parties can be expected to provide most of their limited resources in marginal electoral areas (where the party has a good chance, but is not assured, of electoral success).

Interviews with female and male candidates, party representatives and activists can offer valuable information about gender differences in campaign finance, illustrating the position of individual candidates, the attitudes of political party leaders and social conditions alike.[200] It is particularly interesting to ask if female candidates feel that they have to spend more money (as well as time and energy) to counter sexism in order to achieve electoral success. It is also interesting to establish if only women with substantial financial means (personal or family) run for office, or if women with less access also run. In many societies the ability to raise and spend campaign funds reflects the gender inequalities of the environment, while the inability to raise funds can further perpetuate gender inequality by pricing women out of decision-making/visible leadership positions that could shift this reality. In their Gender Election Observation Mission in Myanmar in 2015, Gender Concerns International found that the costs involved in campaigning led to situations where "…many women were especially dissuaded from becoming candidates from [sic] their own family members".[201]

The view of persons with political party leadership roles is also essential for an in-depth analysis of the issues of gender and campaign finance. Among many issues, interviews with such persons can explore how parties perceive the role of candidates in the party and their involvement in fundraising and campaigning, and the view of parties regarding incumbent members of parliament of the party. An inclination within parties to retain incumbents may add to the challenges of female aspirants, since incumbent MPs in most countries tend to be predominantly male.[202]

In addition, it is important to study the role of women and men not only as candidates in elections, but also as participants in election campaigns. What is the gender balance among those in senior positions in election campaigns? And what is the relationship between a candidate's gender and the candidate's campaign team (do only female candidates select other women as campaign managers for example?)? Interviewing women and men campaigning for women and men candidates can provide meaningful insights regarding the view of campaign activists in relation to gender and campaign finance.

The view of campaign activists may be related to whether these individuals receive financial compensation, as women are in many countries less likely to have access to private funding and are often perceived as having a particular responsibility for household tasks. Female campaign activists may be expected to provide financial compensation in case household tasks need to be taken on by others. Information on how women and men engage in election campaigns, as paid campaign staff and as volunteers, can shed light on gender equality in the political and electoral process. Participating in election campaigns, including fundraising and spending management, may itself provide valuable experience for future electoral participation.

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[198]   OSCE/ODIHR (2015) page 60.
[199]   Ibid.
[200]   For some examples of such approaches (though these documents do not form part of campaign finance monitoring projects), see Murias, Wang & Murray (2020), Casas-Zamora & Falguera (2016) and Ohman & Lintari (2016).
[201]   Gender Concerns International (2015) Page 14.
[202]   Ohman (2004) includes lengthy discussions about party views regarding incumbent MP retention in sub-Saharan Africa, and, in particular, Ghana. Where party leaderships strive to retain incumbent MPs, women aspirants may face increased pressure to prove their ability to raise and spend sufficient funds for electoral success. On the issue of incumbency, gender and campaign finance in Guatemala, see Casas-Zamora & Falguera (2016) page 27.

A final issue to consider is perceptions among voters relating to gender and finance, exploring what expectations voters may have regarding women and men in electoral processes. This includes views among the electorate regarding the inclination of female and male candidates to participate in different campaign (finance) activities. One study found that Tanzanian "...voters perceive men as more active vote buyers", but argued that these "views may come from the perceived opportunity gap in vote buying resulting from the perceived gender gap in resources and social and cultural constraints, rather than from gender differences in attitudes towards corruption."[203] CFM projects can include voter surveys to explore perceptions among voters relating to gender and campaign finance, including issues such as vote buying and abuse of state resources. If women are perceived as less willing to engage in such activities, they main gain votes from being seen as "clean," but they may also lose votes from being seen as less able to provide for their electoral area.

To conclude this section, in designing CFM projects, groups should consider how the monitoring can increase our understanding of the intersection between gender equality and campaign finance, and provide recommendations for improvements. In addition, CFM projects should be internally designed so that they help reduce gender inequalities in society – this is discussed further on page 101.

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[203]   Yung Yoon (2020) pages 139-141. The author pointed to the fact that "Women-only competitions (e.g., nominations of special-seat MPs and women's wing elections of political parties) marred by vote buying also suggest that women are not bystanders in vote buying exercises; they can be as active as men in vote buying if given the opportunity" Ibid page 141.

Step 5. Set delimitations for monitoring

Focus of this chapter: How to delimit a CFM project so that the work follows criteria set down before the start of monitoring, rather than what seems most interesting once the monitoring is underway.

Content of this chapter:

- Delimiting contestants
- Delimiting the monitoring period
- Delimiting the geographical coverage
- Delimiting campaign finance activities to be monitored
- Practical examples of delimitations

No project can cover everything, and CFM projects that try to cover too much are highly likely to fail. The experience from different monitoring projects is that it is much better to carefully delineate the monitoring approach in advance than accepting limitations on an ad hoc basis once the monitoring has started. By determining the delimitations in advance, the risk of bias or wasted resources can be reduced significantly, and project members can be flexible without being distracted by issues that emerge that ultimately prove unimportant to the monitoring.

Determining the most suitable delimitations for any CFM project is depends on the goal and desired outcomes of the project, as well as by the campaign finance problems that the project is designed to address. While naturally it will vary between projects, delimitations for a CFM project often tend to focus on one, two or all of the issues shown in Figure 20 – each type is discussed at length further on in this guide.

FIGURE 20. COMMON DELIMITATIONS OF CFM PROJECTS

CONTESTANTS

Focus monitoring on only some political parties or candidates

Which to include depends on the goal and desired outcomes of the CFM project, as well as on available resources

TIME PERIOD

Focus monitoring on a particular period of time

This can include the entire official campaign period (if one exists), but monitoring can also start earlier to cover pre-campaign campaigning, or only cover part of the campaign period.

GEOGRAPHICAL COVERAGE

Focus monitoring on parts of the area being contested for elections

Which areas to be included depend on the goal and desired outcomes of the CFM project, as well as on available resources

CAMPAIGN FINANCE ACTIVITIES

Focus monitoring on certain aspects of campaign finance, led by the decisions on the first three steps of the campaign finance monitoring

This can include a focus on abuse of state resources, vote buying or gender inequality campaign finance. If monitoring campaign spending, consider which expense categories to include

Delimit contestants

Any delimitation of contestants should be guided by the overall focus and aims of the CFM project. In many cases, CFM projects would only include political parties and/or candidates with a chance of electoral success. This ensures that the normally limited time and resources of the CFM project are not devoted to contestants with limited popular support, and whom will have no impact on the electoral outcome. In countries where the electoral arena is dominated by one political party, this criterion may mean that only government parties would be monitored. However, with rare exceptions (such as if the sole purpose of the project is to monitor abuse of state resources), the contestant delimitation should create a balance between government and opposition. This means that all relevant sides are covered and reduces the risk of actual and perceived bias by the monitoring group.

If the intention is to monitor the financial gap between contestants, minor political parties and/or candidates should also be selected. However, if this is not the goal (or if that goal is limited to analyzing the gap between the government party and the main opposition parties), it is often better to monitor a smaller sample of contestants, which will allow for more time and effort to be devoted to monitoring each.

One difficulty with selecting a set of political parties or candidates to monitor is that it is not always possible to know in advance who will have a chance of electoral success, or in some cases who will actually end up participating in the elections. In such cases, it is often valuable to create a preliminary list of contestants to monitor which can be adjusted as soon as possible (for example, once the list of final candidates has been declared and coalitions have been decided.)

Table 15 below shows the selection of candidates in the CFM project in Afghanistan for the 2009 parliamentary elections.[204] Note that political parties are largely irrelevant in Afghanistan, and that candidates can generally be seen as favoring the government or the opposition. It could be criticized that the share of female candidates monitored was low, though it should also be noted that only 15% of the candidates in Kabul in this election were women. If the goal of a CFM project is specifically to monitor campaign finance from a gender perspective, it would be reasonable to over-represent female candidates in the sample if they only represent a small share of the total candidates. In other cases, matching the gender balance among candidates in the selection of candidates to monitor may be reasonable.

TABLE 15. CANDIDATE SELECTION IN AFGHAN CFM PROJECT

Incumbent candidates		Pro-government/opposition			Gender	
Yes	No	Opposition	Impartial	Pro-government	Female	Male
45%	55%	47%	6%	47%	14%	86%

Delimit monitoring period

The monitor period depends to a large extent on the length of the official campaign period (if any), on other regulations regarding campaigning (such as if there is a ban on campaign spending before the start of the campaign) and on the resources available for the monitoring. There will often be a trade-off between the time monitoring can be carried out and the number of Field Monitors that can be used.

If the goal of the monitoring is to improve the campaign finance regulations by raising awareness about violations of existing rules, it may be valuable to monitor activities that take place shortly before the start of the official election campaign, assuming that the rules ban campaign spending before the campaign starts. It is common practice that electoral contestants incur significant spending during this period, either to avoid violating existing spending limits or to reduce transparency regarding their financial activities. The Moldovan CSO Promo-LEX noted 41 cases of campaign activities carried out before candidates opened their campaign bank accounts in the 2014 elections in violation of the regulations.[205] The Center for Research, Transparency and Accountability (CRTA) in Serbia also found significant campaigning before the official start of the parliamentary election campaign in 2020.[206]

Delimit the geographical areas covered

Few CFM initiatives cover entire countries, and only in very small countries would doing so be a reasonable approach. The geographical delimitation tends to depend on the type of electoral system, the type of election being monitored, the resources available and the overall capacity of the monitoring group. It is normal to focus the selection of areas on ones which are expected to be particularly contested, although if you're monitoring for abuse of state resources and vote buying, you may also want to include party strongholds.

To study how campaign behavior varies in a country, it can also be valuable to include both urban and rural areas. Many organizations that want to carry out CFM consider focusing monitoring on the capital alone, but it may be wise to resist this temptation as campaigning often works very differently in capitals than in the rest of the country. This means that nationwide conclusions cannot be drawn from CFM in the capital city alone; even pilot programs may be unable to provide relevant information if only the capital is covered. If nothing else is possible, consider adding at least one rural area close to the capital.

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[204] FEFA (2010) page 9.
[205] Promo-LEX (2014) page 7.
[206] CRTA (2020a). See also CRTA (2022).

Delimit campaign finance activities to be monitored

The type of campaign finance activities to be included in any monitoring project should, to a considerable extent, follow from the second step of the eight steps in developing a monitoring methodology (that is, the campaign finance problems to address in the project). If the focus in on abuse of state resources or vote buying, these issues will naturally be central to the monitoring design. If focus is on compliance with campaign finance regulations in a country with spending limits, seeking to monitor total spending levels is indicated.

There are also other delimitations of activities to be considered, such as the types of campaign spending areas to include. Monitoring television advertisements can, in some countries, be sufficient to explore the lion's share of campaign spending, while in other cases such advertisements may be prohibited by law. In such cases, whether or not campaign activities such as posters and leaflets should be monitored needs to be considered. Spending on door-to-door campaigning and campaign administration can be particularly difficult, though it has been attempted as part of several monitoring efforts.[207] Spending on online advertising is increasing in many countries. Approaches to monitoring spending on this type of advertising is discussed starting on page 28.

Practical examples

Table 16 shows the delimitations decided on for past CFM projects in different parts of the world (some, though not all, of these projects were supported by IFES).ble 16 shows the delimitations decided on for past CFM projects in different parts of the world (some, though not all, of these projects were supported by IFES).

TABLE 16. DELIMITATIONS IN PAST CFM PROJECTS

Country	Year	Org.	Election type	Contestant delimitation	Time delimitation	Geographical delimitation	Activities delimitation
Afghanistan	2010	FEFA	Parliamentary	22 candidates	4 months	16 Kabul districts & one rural district	Spending, compliance, abuse of state resources, vote buying
Bangladesh	2009	TI Bangladesh	Parliamentary	All candidates	3 months	40 constituencies nationwide	Spending, compliance
Czech Republic	2021	TI Czech Republic et al	Parliamentary	9 political parties	5 months	None	Spending, especially on advertising
Ghana	2004	GII, CDD-Ghana and GACC	Parliamentary	Incumbents	8 months	30 constituencies	Abuse of state resources
Georgia (spending monitoring)	2016	Transparency International Georgia	Parliamentary	Nine qualified subjects (parties)	3 months	Capital city only for outdoor advertising	Outdoor and television advertising, abuse of state resources

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[207]   See, for example, Transparency Serbia (2014).

Country	Year	Org.	Election type	Contestant delimitation	Time delimitation	Geographical delimitation	Activities delimitation
Georgia	2016	PMMG	Parliamentary	-	2 months	9 constituencies	Abuse of state resources
Nepal	2017	Samuhik Abhiyan	Parliamentary (FPTP constituencies)	30 candidates from 5 parties	1 month	Capital city (10 out of 165 seats nationwide)	Spending, compliance (especially with spending limits)
Nigeria	2020	JPDMC	Gubernatorial elections	Candidates from 4 parties	2 months	Edo state	Campaign spending, abuse of state resources, vote buying
Nigeria	2020	JPDMC	Gubernatorial elections	Candidates from 3 parties	2.5 months	Ondo state	Campaign spending, abuse of state resources, vote buying
Poland	2009	Stefan Batory Foundation	European Parliament	5 political parties	4 months	-	Campaign spending, abuse of state resources, vote buying
Serbia	2012	TI Serbia	Presidential and parliamentary	15 political parties	Around 2 months	Selected cities	Spending, abuse of state resources
Serbia	2020	TI Serbia	Parliamentary	Participating parties (large-scale opposition boycott)	2 months[208]	All localities with more than 1,000 inhabitants	Spending, compliance, abuse of state resources
Sri Lanka	2015	TI Sri Lanka	Presidential	2 main candidates	1 month	None	Abuse of state resources
Tunisia	2014	IWATCH	Parliamentary	6 political parties	2.5 months	6 governorates (25% of the total)	Spending, compliance, abuse of state resources, vote buying

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208 A two-month break was necessary because of the COVID-19 outbreak, as the elections were postponed, and a State of Emergency was introduced.

Country	Year	Org.	Election type	Contestant delimitation	Time delimitation	Geographical delimitation	Activities delimitation
Uganda	2016	ACFIM	Presidential and parliamentary	-	10 months	74 constituencies (17% of the total)	Spending (especially rallies and outdoor advertising), abuse of state resources
Ukraine	2012	OPORA	Parliamentary (FPTP seats)	3, 4 and 5 candidates in the different election districts	Around 2 months	3 election districts[209]	Spending

[209] These election districts covered between 147,000 and 172,000 voters each.

Step 6. Identify project outputs

Focus of this chapter: Go beyond monitoring and consider how the information retrieved can be used for advocacy and lobbying. Provide practical advice on issues such as how to write a final report or use online communication tools.

Content of this chapter:

- The importance of considering CFM project output
- Outreach approaches for advocacy and building public awareness
- Using websites, social media and infographics to visualise political finance data
- Developing a final monitoring report

Why thinking about the output of CFM is essential

Collecting data about the financial activities of political actors and potential abuse of state resources by public actors or others is very important, as we have aimed to demonstrate throughout this guide. However, gathering data cannot in itself address the goals or desired outcomes of any CFM project, nor can it reduce any campaign finance problem identified in the project methodology (see *Developing a monitoring methodology in eight steps on Developing a monitoring methodology in eight steps on page 6*).

For any CFM project to have the desired impact, you must disseminate the results of the monitoring. This obvious fact is unfortunately given insufficient attention in the planning of many CFM projects, which may only offer a dense final report as their output, with lots of data but that no one will read (especially if the report is published a year after the elections). In cases like this, the projects may thereby have no impact on the goals and desired outcomes.

Therefore, consider what outputs will help achieve the goals and desired outcomes that you have set (see page 9 for additional information). If, for example, you aim to secure legislative changes on campaign finance, you will most likely want to focus on outputs that may be used to persuade members of parliament and political party leaders. This may include personal briefings of parliamentary staff or committees, or the drafting of legislative amendments that political parties or members of parliament may put forward for adoption. If your main desired outcome is to raise public awareness about the importance of money in politics, using social media and perhaps partnering with influencers may be more effective in getting your message through to average voters and citizens in the country in question.

Whatever approach you use, the nature of CFM means that you are unlikely to have all the data and findings ready until after the elections. Even so, you may wish to make use of the particular attention stakeholders pay to campaign finance ahead of an election. This can be done by publishing preliminary reports or by using social media in different ways (see further below). Timing is essential, and carefully considering what outputs you want to provide at which points in time can significantly increase the impact of the project.

Appointing a spokesperson for the project can be useful to ensure that the organization speaks with "one voice" about

the project and its results. If your organization has a dedicated media or communications team they might serve in this role, otherwise you may want to appoint someone from the core team (this is not necessarily the Project Coordinator, who may already have a lot to do (see page 98 for more detail)).

SOCIAL MEDIA	**WEBSITE**	**INTERIM AND FINAL REPORT**
Use social media to keep your audience informed throughout Consider establishing a schedule to ensure that you post relevant information on a regular basis	Provide information about upcoming CFM projects, as well as ongoing project activities Use the website to publish detailed information	Interim reports can be used to highlight findings during campaign Final report should focus on key findings

FIGURE 21. OUTPUT TOOLS TO GET YOUR MESSAGE ACROSS

Using websites to present the campaign finance data

One approach is to produce accessible databases targeting the population at large and/or journalists interested in campaign finance who do not have the time to go through the raw information. Such databases can be useful both in cases where the regulator publishes its own database that is not easy to use, and where the political finance oversight institution does not publish the information at all. In many countries where submitted reports are public, the only way to access them is at the regulator's offices.

Table 17 below shows examples of how CSOs publish data from officially submitted financial reports, which the CSO has analyzed and presents in a more user-friendly way than the official oversight institution. CSOs also have the luxury of analyzing and presenting data in ways that could be seen as biased if done by the public oversight institution. Some groups that carry out their own monitoring of campaign finance also use their websites and similar approaches to spread information about their monitoring findings, without publishing final reports after elections. This has been the case of Transparency International Czech Republic since 2013, for example.

An interesting example of using databases, though more broadly in the field of anti-corruption, is the Integrity Watch Europe initiative by Transparency International, which gathers information from various existing databases developed by European CSOs.[210]

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[210] See Transparency International (2021).

TABLE 17. WEBSITES OF CIVIL SOCIETY GROUPS ENGAGING IN CAMPAIGN FINANCE MONITORING

Country	Organization/ initiative	URL	Comment
Czech Republic	Transparency International Czech Republic	http://www.transparentnivolby.cz/	In Czech
Georgia	Transparency Georgia	https://transparency.ge/politicaldonations	In Georgian and English
Hungary	Transparency International Hungary	https://transparency.hu/en/kozszektor/valasztasok-part-es-kampanyfinanszirozas/2014-2015-evi-orszaggyulesi-onkormanyzati-es-idokozi-valasztasok-kampanykoltesei	In Hungarian (for 2014-2015 elections
Latvia	Deputati Uzdelnas.Lv	https://deputatiuzdelnas.lv/	In Latvia, covers donations to parties
Netherlands	Integrity Watch Nederland	https://www.integritywatch.nl/	In Dutch, covers donations to parties
Romania	Expert Forum	https://www.banipartide.ro/ See also https://expertforum.ro/campanie-baniipartidelor/	In Romanian[211]
Ukraine	Chesno	https://zp.chesno.org/party-candidates-comparison/	In Ukrainian

Using social media

Apart from developing a final report and putting data on your website, there are many other tools that can be used to make sure that your CFM project works in favor of your determined goals and desired outcomes.

This includes using social media accounts to spread information about your project, findings and recommendations. The most effective approach and social media platforms to focus on depends on what is most commonly used by the target audience in the country in question, and it is likely to vary over time. Sometimes, even a sentence is sufficient to make a point and raise people's interest. On other occasions, you may think about visual or video presentations. Naturally, if the information you present relates to particularly sensitive issues such as abuse of state resources, take special steps to consider how your reporting could be misunderstood or misinterpreted.

The IFES 2021 tactical guide for the use of social media for Election Management Bodies (pictured above) offers ample inspiration regarding the use of social media.[212]

Social Media Strategies for Election Management Bodies — A Tactical Guide to Expanding Voter Outreach

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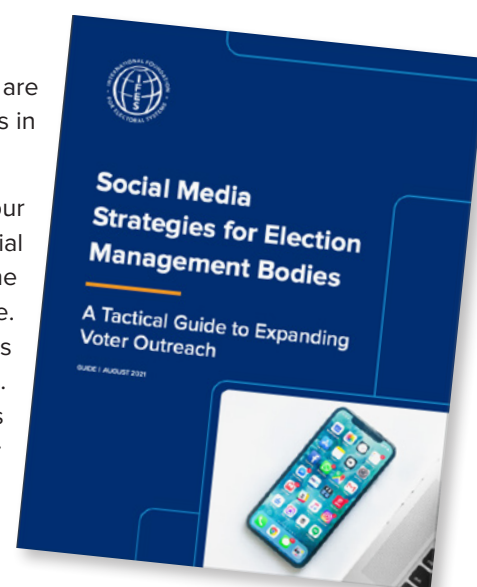
211 The data presentation and analysis presented can be compared to the official site for financial reports at https://finantarepartide.ro/
212 IFES (2021b).

Consider using varying approaches such as webinars, infographics, blogs and vlogs, considering what is the most effective medium for different target audiences. Figure 22 below shows an example of an infographic used by the CSO Expert Forum in Romania .[213]

FIGURE 22. EXAMPLE OF CAMPAIGN FINANCE INFOGRAPHIC
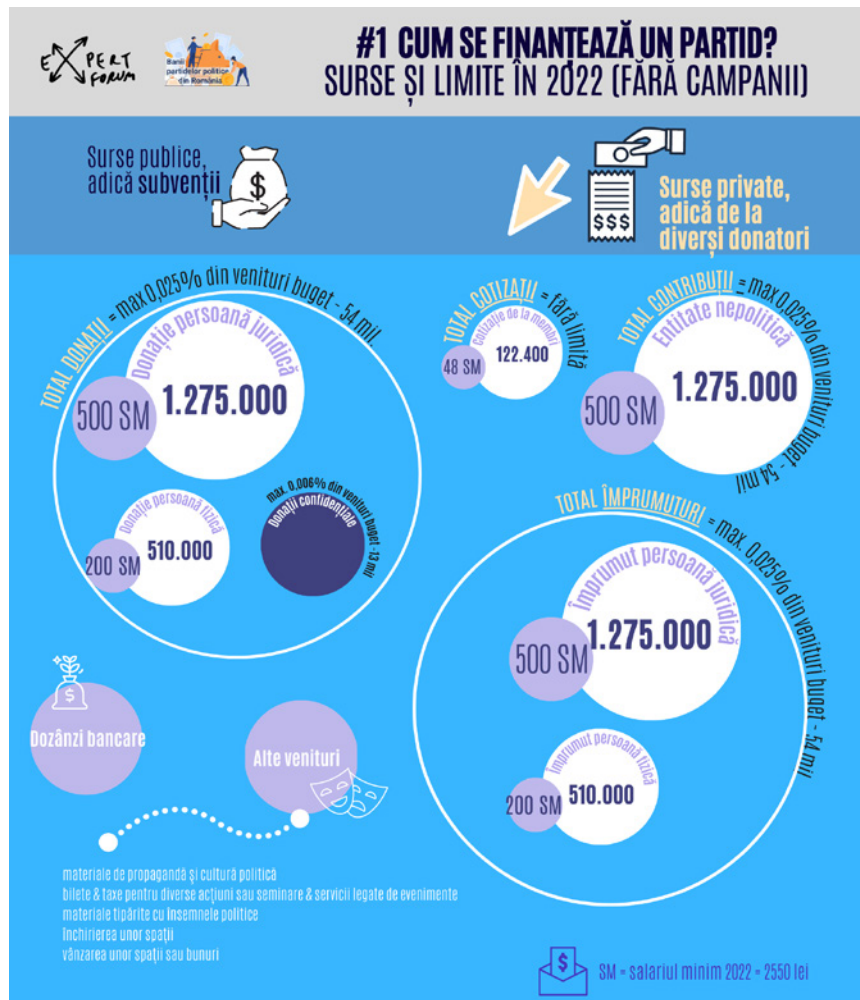
Also consider that while social media is increasingly used by many people (above all by youth) in many contexts and countries, some of the people you wish to reach may be less active on social media. You can identify the most important approaches to use by considering your desired outcomes and, related to this, your target audience. If you find that your target audience may not be receptive to social media outreach, consider how you can use traditional media or other tools to engage with these audiences.

Developing a final report

There are many different possible outputs from a CFM project, and we encourage you to be innovative in thinking how you can use the data collected to achieve your desired outcomes and assist in reaching your goals. Producing a final report outlining the methodology, findings and recommendations from your project is a classic approach, but no less valuable, if done right. It also provides material that can be excerpted and used in diverse ways (e.g., on social media, or for targeted reports or presentations to stakeholders).

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213   This infographic was developed by Expert Forum in Romania, and is reproduced with kind permission. It can be found on https:// expertforum.ro/wp-content/uploads/2022/01/baniipartidelor1a.png.

Some things to remember when producing a final report:

- *Start planning the report while you are planning the project.* In many CFM projects the report almost seems like an afterthought. That is not necessary, and it often leads to an inferior result and a lesser chance of you reaching your goals. While you cannot know in advance what the findings of the report will be, you will know what issues you want to address in the monitoring. Create an outline of the report in advance, and make sure that during the monitoring you are collecting data that will inform your writing of the different sections. An outline example is included in Table 18.

- *Decide on a person in charge of developing the report.* This person does not necessarily have to write the entire text – rather, their main task should be to ensure that all sections are written and on time. The person in charge is often the Project Coordinator, but this need not be the case. While that person will be intimately familiar with the project and its findings, the Project Coordinator may have a lot to do both during and after the monitoring.

- *Emphasize your most important findings.* In too many CFM project final reports the main findings are deeply hidden in a mass of more or less valuable information. Use the goals and desired outcomes you have determined to guide you in what information should be included in the report, and which findings you should emphasize.[214]

- *Include an Executive Summary.* Few people will read a full CFM report, so if you do not include an Executive Summary where you include the main activities, findings and recommendations, there is a significant risk that you will not get through to the people you wish to reach.[215]

- *Provide information about your methodology, but do not let this take over the report.* The credibility of your project and its findings are well-served if you are clear in the final report about your methodology. However, some CFM project reports start with their methodology and make readers go through page after page before they get to any information about the project findings. To avoid this, consider putting the methodology section towards the end of the report or even as an appendix (see Table 18 for an idea). You may also decide to put the bulk of the details about your methodology on your website, and then offer a shorter summary followed by a link to where this information is located in the actual report.

TABLE 18. EXAMPLE OF FINAL REPORT OUTLINE

No	Section	Comment
1	Executive Summary	Many readers will only read this text - it should not be more than 2 pages and should include key findings
2	Recommendations	The recommendations would here be listed in summary format (bullet points). Those who want to know more about why you are making these recommendations are referred to sections 4-6. Depending on the situation, it may also be useful to categorize recommendations depending on recipients, and/or on short or long-term recommendations
3	Introduction	A quick introduction to the issue of campaign finance and why it is important. Briefly about the project and the delimitations made – for more details, refer to section 8.
4	Findings from monitoring of campaign spending (if this is carried out)	A presentation of the work done in this field and the findings, as well as the related recommendations (explicitly linked to the findings)

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[214]   If you are writing about abuse of state resources, see the section *Criteria for judging when abuse has occurred* starting on page 61.
[215]   If the report is very long, it may also be valuable to have a brief summary at the beginning of each chapter.

No	Section	Comment
5	Findings from monitoring of abuse of state resources (if this is carried out)	A presentation of the work done in this field and the findings, as well as the related recommendations (explicitly linked to the findings)
6	Findings from monitoring of vote buying (if this is carried out)	A presentation of the work done in this field and the findings, as well as the related recommendations (explicitly linked to the findings)
7	Conclusions	In this section, the recommendations are put in context; related to the findings
8	Methodology	This could be an appendix; it should include key data such as the number of monitors and number of observations (submitted Checklists).

One question that is often asked is how long the final CFM report should be. There is no right answer to that question; it depends on your determined goals and desired outcomes, as well as on your monitoring and findings.[216] Consider the stakeholders that the CFM project focuses on – busy legislators may want quick digestible facts while media may look for quotes and infographics. Academics on the other hand are more likely to look for detailed and well referenced data.

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[216] A review of 22 final reports from past CFM projects showed that they ranged from 20 to 220 pages.

Step 7. Plan for effective project management

Focus of this chapter: Review practical issues to be considered in preparing and carrying out CFM, with special attention to staffing issues and budgeting.

Content of this chapter:

- Different ways of organising CFM initiatives, and those working on them
- Project team trainings
- Making CFM projects internally gender-sensitive
- Developing a timeline and budget for the project
- Addressing communication issues
- Security concerns

Most initiatives are improved by good planning, and by careful thought in advance concerning how different tasks will be carried out. CFM projects are no exceptions. This chapter explores the lessons learned from different CFM projects around the world regarding the most effective way to organize a CFM project. Naturally, there is no model one-model-fits-all and your organizational structure should be arranged so as to fit the goals and intended outcomes of the project, as well as the other considerations regarding how the monitoring should function (see Developing a monitoring methodology in eight steps). Even so, those wishing to carry out CFM can learn a lot from the experience of those who have already done so.

Conducting a risk analysis

At an early stage in the preparations for a monitoring project, it is strongly advised that you carry out a risk analysis to anticipate what risks the project may face, how such risks can be prevented, and how risks can be mitigated and their impact minimized if they should occur.

An analysis of this kind will allow you to develop your CFM project proactively anticipating potential risks and considering how they can be prevented and mitigated. A brief example of such an analysis is shown in the table below.

TABLE 19. EXAMPLE OF A RISK ANALYSIS

Potential risk	Probability	Impact if occurring	Action to prevent risk	Action to mitigate risk if occurring	Comment
Political parties refuse to share information about campaign events in advance	High	Medium	Initiate early contacts with parties to explain project in non-threatening manner	Monitor social media for information about upcoming events	It is likely that party X may refuse to give this information, while party Y may be more open.
Advertising companies fail to provide information about campaign adverts	Medium	Medium	Contact early to explain project, explain that companies will not be named in reports	Monitor advertising independently	If possible, establish company willingness in advance
Local party supporters threaten Field Monitors	Low	High	Take out adverts explaining purpose of monitoring	Ensure that Field Monitors can quickly report any threats	*See page 106 for further security considerations*

Organizational structure

The first thing to consider is who should be involved in the project, what their respective roles should be, and how they will communicate with each other. Getting the organizational structure right is important for all monitoring projects, but its importance increases the more people are involved in a project. The 2004 CFM project in Mongolia included a total of 50 participants including teams for monitoring campaign events and the media and a separate analysis team.[217] The 2014 CFM project in Tunisia included, at its peak, nearly 90 people, with about 60 working within the 2010 project in Afghanistan. Other projects are based on a smaller group of people; particularly where projects do not include Field Monitors, the number can be kept quite low. An example was the monitoring of the 2021 parliamentary elections in the Czech Republic where the monitoring team had 15 members from different organizations.[218]

Naturally, the most appropriate staffing structure for a CFM project will vary by case. Figure 23 shows a structure that, with some variation, has been used in a series of CFM projects, from Afghanistan to Tunisia to Ukraine. It is based on a small core team that receives and analyses data, and which leads the work of the Field and (when applicable) Media Monitors. The different positions can be held by one or several people, depending on the scope of the project.

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217   Open Society Forum et al (2004) page 7.
218   Transparency International Czech Republic (2021).

FIGURE 23. SAMPLE ORGANOGRAM FOR CFM PROJECT
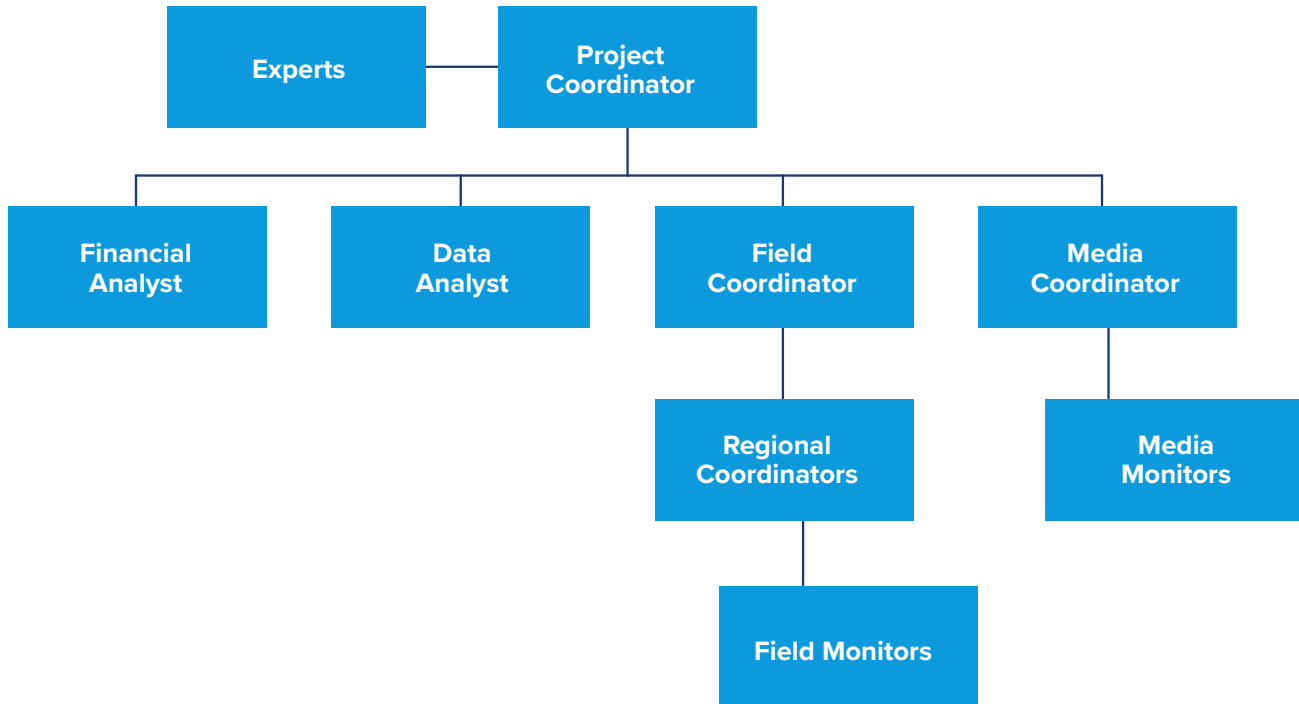
Field Monitors

While there are exceptions (including some of the abuse of state resources monitoring efforts by Transparency International Georgia), most CFM projects in the past have relied heavily on Field Monitors, that is, individuals who monitor what is happening in the monitored area for a designated period. The work of CFM Field Monitors is largely similar to that of Long-Term Observers (LTOs) in traditional election observation missions, and as with LTOs, the main advantage with Field Monitors in a CFM project is that they can be the eyes and ears of the project on the ground, providing information that would otherwise be unavailable. The main difference between LTOs in classic election observation and CFM Field Monitors is that the latter tend to have more targeted tasks, and are often deployed for longer periods (for examples of different lengths of CFM field monitors' deployment, see page 85).

Most of the work of Field Monitors tends to focus on monitoring the actual campaigning as it happens. In many cases, it has been found to work best when their work is based on a mix of previously decided activities, such as regularly visiting designated streets to monitor billboards or monitoring public institutions for evidence of abuse of state resources, and case-by-case monitoring requested by a regional coordinator, for example, of campaign events that have been announced in the media, or public events such as the launch of a new public health initiative (see the section *Monitoring campaigning at public institution events* above). Field Monitors should also keep their eyes and ears open regarding any activities that fall within the scope of the CFM project. Exactly how formalized or flexible the work of Field Monitor should be decided before monitoring begins and must be clearly communicated to them during training.

The number of Field Monitors used in CFM projects has varied significantly. One 2020 CFM monitoring project of the Edo and Ondo Gubernatorial elections in Nigeria included as many as 140 Field Monitors.[219] For the 2009 parliamentary elections in Lebanon, the entire country was monitored using a total of 79 Field Monitors. About half of them carried out their monitoring over ten months, with the entire force deployed for four months.[220]

More modest in this regard was the 2012 monitoring of the parliamentary and presidential elections in Serbia, which relied on 21 Field Monitors in Belgrade and other cities. For a Ukrainian monitoring project the same year used the same number of field monitors. The monitoring of the 2014 local elections in Slovakia relied on two volunteer monitors

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219   JDPMC (2020) page 14.
220   LTA (2010) page 25.

in each of the eight regional capital cities, but this project focused more on analyzing official reports by political parties and candidates rather than on independent monitoring of campaign spending. The PPMG pilot project on monitoring abuse of state resources in areas of ethnic minorities in the Georgian 2016 elections included seven field monitors.

Somewhere in-between was the 2014 parliamentary monitoring effort in Tunisia. Like the Lebanese case, they started with a lower number of monitors before the start of the official campaign, and then increased this number once the campaign started, allowing them to cover a longer period before the campaigning started officially, but also to have a higher number of monitors during the most active campaigning period. Around 30 Field Monitors were used to cover the six selected governorates, increasing to nearly 50 during the campaign itself.

FIGURE 24. COMMON ROLES FOR FIELD MONITORS

COMMON ROLES FOR FIELD MONITORS

Monitor campaign spending as part of PET (for example campaign events, billboards and banners)

Monitor abuse of state resources during campaign events, public events and in public institutions

Monitor evidence of vote buying

Follow-up accusations of violations

Maintain contact with local stakeholders

Field Monitors' levels of activity also vary. In most CFM projects the monitors have worked full-time in their monitoring capacity. In the Lebanese case however, they only toured their respective monitoring areas every other week during the pre-campaign period, and once a week during the campaign period itself.[221]

Field Monitors should be provided with set checklists so they know exactly what information to capture. Such checklists should be developed by the core team and can be inspired by the sample checklists in this guide, starting on page 126.

Regional Coordinators

If there are many Field Monitors, it is impractical to have them all report to a central Field Coordinator, and such an approach could lead to bottlenecks and delays in identifying key findings, as well as problems with the monitoring process.

Perhaps the highest number of Field Monitors per regional coordinator was in the 2009 Lebanese CFM project, where four coordinators shared the responsibility to support 79 Field Monitors (around 20 per coordinator). As mentioned above however, in this project the Field Monitors did not work full-time.[222]

In Serbia in 2020, the Regional Coordinators were responsible for between 12 and 23 field monitors, while in the Tunisian project, using full-time monitors, five Regional Coordinators were responsible for between six and 11 Field Monitors each. In Ukraine in 2012, the three coordinators were in charge of five, seven and nine Field Monitors, respectively.

It is important that the Regional Coordinators communicate closely with their Field Monitors so that they can quickly identify any problems that may exist and respond directly in case of security concerns. In addition, the Regional Coordinators must be familiar with the political dynamics in their monitoring area so they understand the peculiarities where they are active, and can communicate to the core team in case general monitoring approaches would not work or need to be modified in their area.

Media Monitors (and Media Coordinators)

There are often distinct similarities between Media Monitors and Field Monitors in that their main role is normally to gather rather than analyze data. However, their roles differ in other ways. For one thing, Media Monitors are seldom required to go outside to carry out their assignment in the field; their work is normally done in front of a computer or television, or by skimming through newspapers. Media monitors also seldom need to carry out the monitoring in real time, unlike, for example, when a Field Monitors observe a campaign rally or door-to-door campaigning.

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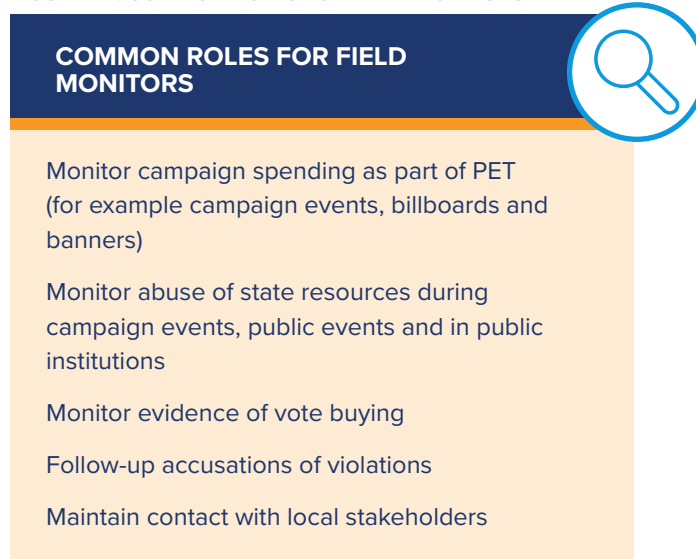
[221]   LTA (2010) page 25.
[222]   LTA (2010) page 10.

Media monitoring is normally highly formalized, and thoroughness is often the main quality to look for in appointing a Media Monitor. The same goes for the Media Coordinator, in case the number of Media Monitors indicate that having a coordinator manage their work would increase the effectiveness and reliability of the data (if desired, the Media Coordinator can also serve as Media Monitor).

For information about the monitoring of spending on media advertising, see page 28 – 33. Media monitoring in relation to analyzing abuse of state resources is discussed on page 58.

Core team

Project Coordinator

Hierarchies can be limiting and reduce the creativity and innovation within civil society activity. Even so, the experience is that CFM projects need one person who takes the overall responsibility for activities being carried out, and who looks after all the work and the people carrying it out. Figure 25 gives an example of the responsibilities of the project coordinator (in this case in Tunisia), though naturally this will vary significantly between projects.

FIGURE 25. SAMPLE RESPONSIBILITY LIST FOR PROJECT COORDINATOR

*Before the monitoring start*s
1. Finalise the monitoring methodology
2. Develop monitoring and evaluation plan
3. Decide the project approach to media monitoring once project budget and campaign finance media regulations are known
4. Hire Data analyst, Financial Analyst and Field Coordinator
5. Together with Field Coordinator, hire Governorate Coordinators
6. Oversee selection of Field Monitors
7. Hire Media Coordinator if it is decided to fill this position
8. Develop training curriculum and materials for Governorate Coordinators and Field Monitors
9. Carry out training of Governorate Coordinators and Field Monitors together with Field Coordinator
10. Decide on media monitoring implementation plan based on recommendation from Media Coordinator
11. Coordinate project activities with activities in other projects
12. Coordinate project activities with the work of other relevant institutions
13. Submit narrative reports to donor as required by contract

During the monitoring
1. Debrief the field monitors after the first week of monitoring together with the Field Coordinator
2. Receive regular reports from Field Coordinator about the work of the Field Monitors
3. Receive regular reports from Data Analyst about the inflow of relevant monitoring data
4. Receive regular reports from the Media Coordinator
5. Maintain coordination with other projects and other initiatives
6. Ensure that pre-election report is developed and published
7. Submit narrative reports to donors as required by contract

After the monitoring
1. Debrief other project staff
2. Develop final report together with data analyst and other relevant personnel
3. Develop report evaluating the project and provide recommendations for future similar initiatives
4. Submit narrative reports to donors as required

Field Coordinator

If the CFM project is based on a small number of monitors, it may be most efficient for them to report directly to the Field Coordinator, who then keeps track of their ongoing activities and provides guidance as needed. However, as discussed above, if there are many Field Monitors, it may be preferable to have Regional Coordinators to support the monitors in the field, and to have these, in turn, report to the Field Coordinator.

The responsibility of this person is to keep a close eye on the Field Monitors (if necessary through the Regional Coordinator) to quickly and effectively identify any problems and cases to investigate further. Make sure that this person is available at most times and is responsive, both to Field Monitors and the Project Coordinator.

Data Analyst

Another important position is that of Data Analyst. In comparison to traditional election observation missions, most CFM projects contain a lot of data that not only needs to be collated, but also carefully analyzed. This is particularly the case if the monitoring focuses on campaign income and/or spending, even more so if the project includes parallel expense tracking (see Chapter 3). The data analyst may also be best placed to quickly identify if important data is not coming in from the monitors as anticipated and can then notify the project or observer coordinator. If your project involves a lot of data, you may need more than one Data Analyst. If so, make sure they communicate and work closely together to avoid overlaps and gaps.

Financial Analyst

This person does not deal with the finances of the project, but rather the finances of the political actors being monitored and/or the public finances (the latter in case of monitoring abuse of state resources). If the focus is on the financing of election campaigns, the Financial Analyst (if one is needed) should work closely with the Data Analyst. If the focus is on abuse of state resources, much of the Financial Analyst's time will be spent reviewing financial data received from public institutions regarding budgets and spending.[223] For more information about monitoring public finances in the context of abuse of state resources ("budget monitoring"), see page 50.

There is most commonly one Financial Analyst in a CFM project, though the 2012 project in Ukraine used two.

Other roles

Depending on the goals, desired outcomes and campaign finance problems that the CFM project is set to address, you may wish to involve additional people in other capacities. Perhaps the most common role not mentioned above is that of a Legal Analyst, who reviews and comments on the existing legal provisions on campaign finance and/or areas such as abuse of state resources or vote buying.

While having a solid understanding of the current legal situation is essential, make sure that the legal analysis does not take up too much time or effort in the project, nor too much space in the reporting. While there are exceptions, the main impact that a monitoring project can have is often in collecting and analyzing data about the behavior of different actors rather than in reviewing the existing legal provisions.[224]

You may also need various support project members for the project, depending on the goals, project setup and of course, your budget. When the security situation is challenging, you may also wish to have a person who is directly in charge of the security of everyone involved in the project (see page 106).

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[223]   Depending on the situation, the Financial Analyst may also need to spend much time getting hold of such data, for example, through Freedom of Information requests.
[224]   Making recommendations about legal reform can be an important part of a CFM project. In many cases, such recommendations are most effective if backed by firm data rather than simply by an analysis of the legal provisions themselves.

Project team trainings

Regardless of how well the project is planned and how carefully the people to be involved are chosen, the work will not be successful unless everyone involved knows what their tasks are and how they fit into the project as a whole. Training of everyone involved is therefore crucial, and neglect of the training stage will cause significantly more work later on (and may jeopardize the entire project).

As soon as the methodology is finalized, a training curriculum should be developed including overall goals and approaches, training agendas and materials. It is often advantageous to hold a workshop for the core team members as soon as they have started working to explain and discuss the overall goals and desired outcomes of the project and the respective roles of all core team members. Core team members also need to be aware of the legal framework for campaign finance in the country in question. This workshop can also be used to develop or refine the intended approach for trainings of further project personnel.

If Regional Coordinators are used in an CFM project, it can be advantageous to train them prior to training Field Monitors. If the Regional Coordinators come from or live in the areas where the monitoring will be carried out, they can provide highly valuable information about politics and election campaigning in their particular area, allowing for the methodology to be more suited to the situation on the ground. The main focus of this training should be less on the overall goals of the project and the nature of campaign finance, and more on their roles as Regional Coordinators, that is, how they should support the Field Monitors and how they should communicate with the core team. The Regional Coordinators should also be asked to review and make suggestions for changes to the training plan for Field Monitors.

The training of the Field Monitors has been the most important training in many past CFM projects. This is because if the Field Monitors do not know what to do, the project will often not be able to gather valuable information. In most cases, focusing their trainings almost exclusively on the practical role of their field monitoring has been valuable. Do not spend too much time on explaining the overall concepts of campaign finance or going into a lot of detail about the campaign finance regulations in the country, apart from regulations that are directly relevant for the Field Monitors. In the 2020 JPDMC monitoring project in Nigeria, the training of Field Monitors lasted between two and three days.

In general, the trainings should be as hands-on as possible, including the filling in of sample forms, role-playing and scenario discussions.[225] A lot of time should be dedicated to answering any questions that the trainees may have. Monitoring checklists and other materials can also be refined on the spot based on suggestions from the prospective Field Monitors. For Media Monitors, their training should focus on their specific tasks, and on challenges that may arise.

Apart from this, holding trainings for people outside of the direct CFM project should be considered. This could be trainings for media professionals and/or civil society groups about campaign finance regulations and how to discover and report cases of potential violations (either to the CFM project or to the authorities). Public information events can also be held concerning what is and what is not allowed in a particular country. Inviting outsiders to offer their knowledge in training to increase awareness about the work being carried out by CFM personnel can even be considered. For example, the Pera't Pulitika monitoring network in the Philippines invited researchers and journalists to participate in their training of project members in 2007.[226] In other cases, it may be preferred to separate events held within the project from those held with external stakeholders.

Remember to adjust the trainings to the needs of the different project members. Examples of areas to focus on are shown in Figure 26. All trainings should include a focus on security to ensure the safety of everyone involved at all times. See page 106 for more information.

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[225]   During consecutive trainings of CFM personnel in Ukraine, one day ended with the Field Monitors being asked to go out and monitor billboards. As these trainings took place before the start of election campaigning, they were asked to monitor billboards by certain commercial companies instead of for political parties or candidates.
[226]   Pera't Pulitika (2007) page 8.

FIGURE 26. EXAMPLES OF CONTENT OF PROJECT TRAININGS

Core team
Political finance
Overall goals of project
Project management
Data analysis

Regional coordinators
Communication with core team
Support to Field Monitors
Monitoring directly by regional coordinators

Field and Media Monitors
How to carry out monitoring
Filling in Checklists
Communication with Regional Coordinators
Security issues

Others
Purpose of the monitoring project
How others can support the project
Cooperation and synergy effects with other initiatives

Making the CFM project internally gender-sensitive

Starting on page 76, we discussed how campaign finance monitoring can and should consider issues of gender equality and campaign finance. As important as it is for CFM projects to consider gender inequalities in the campaign finance and election campaign environment, these projects in and of themselves should themselves strive to break down barriers between women and men and ensure that the monitoring work does not perpetuate existing gender imbalances.[227]

The various considerations regarding the organizational setup of a CFM project have been discussed at length in this chapter. In the selection of persons for all positions, including core team members, regional coordinators (if used) and monitors, those responsible should strive for a balance between women and men. This includes ensuring that women are not only included in more junior positions, but also in leadership positions.

Just as financial support to candidates and campaign activists can have an impact on the participation of women and men, the same applies to those participating in a CFM project. Consider if the financial support given to CFM participants (including Field Monitors) may have an impact on gender equality, both quantitatively and qualitatively. Especially in societies where women are considered to have a particular responsibility for household tasks including childcare, such perceived responsibilities should also be considered when deciding on CFM work responsibilities of team members, including the time of day when different tasks are expected to be carried out. In cases where university students may be particularly recruited as Field Monitors, consider the gender balance amongst them.

The perspectives of adopting a gender angle on campaign finance monitoring discussed on page 76 also has implications for how the monitoring is designed. If a PET approach is adopted to monitor campaign spending (see page 17), then this can be used to disaggregate spending by male and female candidates. This requires, however, that the system is set up so that it allows for gender coding of the candidates in the PET system.

This also applies to the possibility of disaggregating donor records by gender – unless such information is directly available in donation records published by the public oversight institution (and it will very seldom be available), consider how a system can be created that assigns gender to donors and disaggregates the value of their donations.

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[227]   The same relates to barriers for non-gender conforming persons.

Organizations wishing to monitor the role of money in campaign finance are encouraged to carefully consider the overall position of women and men in their society, and how this can impact both the monitoring focus and the setup of the CFM project itself. Engaging with CSOs that specifically focus on gender equality in the country can provide valuable insights into possibilities for gender-sensitive monitoring. There are no set answers on this issue and few previous experiences to draw on, so anything you do will be innovative. Consider sharing your experiences of including a gender perspective of your campaign finance monitoring on for a such as iKnowpolitics.[228]

Timeline

You will also need to plan for the amount of time that all aspects of the CFM project will take. How long it will take to plan the project will, for example, impact how far ahead of time the core team members need to be working before monitoring, and when different other persons need to be selected, trained and deployed.

In deciding on the project timeline, it is of course essential to consider the most important times for campaign finance activities. What is the most important will depend on the focus of your particular monitoring project, but Table 20 may serve as inspiration.[229]

TABLE 20. ESPECIALLY IMPORTANT TIME POINTS FOR CAMPAIGN FINANCE

Period	Explanation
During candidate selection process	The competition to be nominated by a political party is in many cases as fierce as the election, and corruption tends to be rife. Note however that such practices, while arguably harmful to intra-party democracy, are not necessarily illegal.
Shortly before start of election campaign	In cases when political parties have to report on their income and expenses during the campaigning period, it is common to see a surge in fundraising and expenditure shortly before this period commences, for obvious reasons.
During election campaign	Understandably, political parties and candidates tend to concentrate most of their campaign expenses to the actual campaign (though fundraising often starts earlier). Whether expenditure will focus on the beginning or the end of the campaigning period depends on a number of factors, such as the length of the campaigning period (when legally stipulated) and the availability of media channels with wide outreach capabilities. In some cases, political parties and/or candidates are also obligated to submit financial reports at the beginning of and sometimes during the campaigning period.
One to two months after polling day	In cases where electoral competitors are required to submit financial statements after an election, this often takes place at least one month after polling day. Following the deadline for submission, the PFR is normally mandated to audit received reports. Whether submitted statements and the subsequent reports by the political finance oversight institution are made public varies from country to country.

The overall timeline for your project will often be dictated by issues such as the budget and the campaign period in the country. Setting up a timeline for the project makes it easier to check that things develop as planned and identify things that fall behind. Table 21 shows key activities that you may wish to include in the project timeline.

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228   https://www.iknowpolitics.org/
229   Taken from Ohman (2009) page 11-12.

TABLE 21. ITEMS FOR THE CFM PROJECT TIMELINE

Period	Explanation
Decision on project goals, desired outcomes and monitoring methodology	The first step is to determine the monitoring methodology. See all of this guide, starting with *Developing a monitoring methodology in eight steps.*
Selection of core team members	After a decision is made which positions are needed for the project, the most suitable persons for these positions must be selected.
Training of core team members	The core team members need to be trained. As this is likely to be a small group, you may wish to do this through informal discussions about the monitoring methodology, with each member reviewing a draft set of tasks for their position and making comments.
Selection and training of Regional Coordinators (if used)	If you decide to use Regional Coordinators in your project, they will need to be selected and trained. Their role in overseeing the work of Field Monitors may be assisted if these Regional Coordinators are trained before the Field Monitors they are meant to coordinate. See page 100.
Detailed plan for the monitoring completed	While it is good to make the monitoring methodology as detailed as possible at an early stage, you should always be open to modification through discussions with core team members and regional coordinators. Seek to finalize the methodology as much as possible before the training of Field Monitors though, to avoid confusion.
Selection of Field Monitors	This needs to be done carefully – many CFM project stand and fall based on the quality of the Field Monitors. See page 96.
Training of Field Monitors	The training of Field Monitors is also essential for a good CFM project. This may take several days and may lead to a finetuning of the monitoring methodology. See page 100.
Deployment of Field Monitors	The start of the monitoring will be determined by your methodology, as this will indicate what needs to be monitored. In many CFM projects, the monitoring starts before the official campaign period to monitor if "pre-campaign campaigning" takes place.[230]
Early monitoring evaluation	It can often be useful to do an early evaluation meeting with Field (and Media) Monitors to detect and respond to any errors or misunderstandings regarding the monitoring. See page 110.
Publication of pre-monitoring results	If you decide to publish pre-election reports (in whatever format) with preliminary results, develop a timeline for this.

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[230]   For example, the 2021/2022 monitoring by CRTA in Serbia identified 4,000 reports of campaigning before the start of the official campaign, CRTA (2022) page 10. Similarly, the Ukrainian CSO OPORA noted significant levels of pre-campaign campaigning in the 2021 parliamentary by-elections. OPORA (2021).

Period	Explanation
End monitoring	The monitoring methodology will also determine the most suitable time to end the monitoring. If issues such as abuse of state resources or vote buying are being monitored, it may be especially wise to end the monitoring some time after election day.
Publication of post-monitoring results	A common shortcoming of many CFM projects has been that the results are published long after most people have stopped caring about the election. See further page 88.
Project member evaluation	It is important to talk to all project members to get their experience from the project. This may be done before or after the results of the monitoring are published, and it should ideally be done independently of that work (those working on a post-monitoring report are likely to be terribly busy). See page 111 for further detail.
Evaluation report	This is an internal document outlining the experiences of monitoring, including recommendations for future CFM projects. See further page 111.

Budget

Most activities, even if the work is based on volunteers, require resources. Identifying the required resources in advance is necessary for making sure that the work can be carried out as planned. Whether the monitoring group is developing a proposal to a national or international donor institution, or is intending to fund CFM internally, it is highly recommended that a budget be developed to ensure that the resources available are used as effectively as possible. Just as part of the rationale of CFM calls for improved financial management among political actors, civil society groups need to ensure that their own finances are in order.

As discussed in various sections above, most CFM projects rely at least partly on Field Monitors. Financial compensation to these individuals tends to be the largest budget category. Careful consideration should therefore be given to this during the budgeting phase. Relying on volunteers can considerably reduce the overall cost of the project. Such an approach may also be reasonable; many CSOs rely on volunteers for their work.

However, as field-monitoring in a CFM project normally requires a significant amount of time, there may be downsides to relying on volunteers, as they may be less committed and may feel the need to engage in other activities as well to ensure a reasonable income. Likewise, financial compensation to field monitors at a level below what they consider reasonable may also negatively impact their morale and level of engagement. The more each Field Monitor is paid, however, the fewer monitors will fit into any given budget, so a reasonable balance is key. The length of time that Field Monitors will be deployed also needs to be carefully considered. This issue was discussed in more depth in *Step 5. Set delimitations* .

TABLE 22. COMMON BUDGET CATEGORIES FOR CFM PROJECTS

Item	Purpose	Comment
Financial compensation for Field Monitors	Ensure that monitors are motivated and can dedicate the required time to the monitoring efforts.	As noted above, the amount provided to each Field Monitor is a crucial determinant in how many monitors the project can afford.
Financial compensation for core team	Core team members will often need to work full time on the project and may therefore be unable to secure another income.	The level of financial compensation for core team members may have an impact on the quality of professionals willing to work on the project.
Training of core team and Field Monitors	Ensure that everyone knows their role and what is expected of them.	If Field Monitors are spread out geographically, consider if they should be trained jointly or in separate locations.
Transport for Field Monitors	To ensure that Field Monitors can travel around to do their monitoring.	Consider travel needs carefully. Some CSOs have used Field Monitors with their own vehicles.
Transport for core team	So that core team members can travel to monitoring areas.	This would include transport costs for Regional Coordinators, if used.
Communication costs	All project members can easily and effectively communicate with each other.	If all Field Monitors have a smartphone with mobile data, communication can be via a messaging app.
Holding of outreach events, such as press conferences	To ensure maximum attention before, during and after the monitoring effort.	Needs and costs for events of this kind should be anticipated in advance, as far as possible.
Other costs	So that the project can run smoothly.	Including costs for the administration of the project.

Communication issues

External communication

One issue many organizations planning a campaign finance monitoring project discuss is how much information they should make public in advance about their activities. Openly declaring that they are going to monitor campaign finance increases the transparency of the initiative and may even encourage contestants to alter their behavior. Importantly, it may also reduce the risk of the monitoring CSO being accused of political bias and acting secretly, and it can increase the safety of project members. The Declaration of Principles for International Election Observation states that

international observer missions must publicly announce their presence and work in a country.[231] The handbook for CFM in Kosovo recommends "that political entities be contacted in advance and be informed that they will be part of the monitoring."[232]

On the other hand, announcing in advance exactly who and what will be monitored, and how the data will be analyzed may reduce the opportunities for the monitoring project to effectively collect accurate data about campaign income and spending, and especially about more sensitive areas, such as abuse of state resources and vote buying.
Each CSO planning to engage in CFM should carefully consider its approach to advance public statements about its activities, erring, when possible, on the side of transparency. The decision on this issue also has a bearing on security concerns – see further below.

Internal communication

For the CFM project to be effective, all project members must be able to communicate quickly and easily. This does not mean that all Field Monitors should bypass others and send frequent messages to the Project Coordinator – they may be asked to normally communicate with their Regional Coordinator or Field Coordinator, as appropriate. Do, however, have a channel for complaints regarding corruption, harassment or unsuitable behavior of team members.

The exact format of internal communication will depend on your project, country context and budget. In many countries, most people will be expected to have smartphones, and they can communicate via a predetermined app. If there is a concern that external actors may attempt to access or interfere with the internal project communication, make sure to select an app that has a good security record, including data encryption and independent security analyses. This is especially important if Field Monitors or others send substantial amounts of monitoring data via the app.

The internal communication within the project is especially important in relation to security concerns, which is the topic of the next section.

Security concerns

Why security issues should be considered in CFM projects

Security is essential, and there is always a risk that activities can have security implications. Simply having people travel around in cars brings the risk of traffic accidents. There are additional reasons why CFM projects, in particular, can bring risks for the safety of those involved. Studying the role of money in election campaigns can mean discovering illegal activities, including vote buying, abuse of state resources or the involvement of organized crime. Even when such activities are not studied or detected, political parties and candidates may resent others looking into how they raise and spend money, and accusations of bias is common.

The specific security preparations for your project will depend on your situation. Not all risks can be anticipated, but preparations can reduce the security risks to those involved in the CFM project. A separate security policy can be developed for the project, or security issues can be included in a more general policy for the project. Trainings of project members (see further page 100) should include a focus on security, ideally including scenario practices.

On page 94 we discussed the value of conducting a risk analysis. While such an analysis will normally go far beyond security concerns, it can be very valuable in identifying potential security risks, which you can then seek to prevent, or if they should occur, mitigate their impact.

How to be prepared for security threats

Because of these various potential challenges that persons involved in monitoring campaign finance may face, it is important that the design of the CFM project considers potential security issues. This may include developing a security strategy, or at a minimum, referring to security preparations in the project methodology.

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[231]   United Nations Electoral Assistance Division (2005) page 5.
[232]   Transparency International Czech Republic and Kosovo Democratic Institute (2017) page 5.

One important system that needs to be in place is for the Project Coordinator (or designate) to be able to reach all project members within a very short time-period (ideally, 45 seconds) and tell them to stop all activities until further notice. This can happen, for example, if a threat to the project or its members has been detected, and it is essential to stop all activities until the threat has been investigated or removed. A system of this kind can be set up fairly easily by having a group of all involved set-up on the predetermined messaging app on the Project Coordinator's phone (though it may be less efficient if there are multiple Field Monitors may be outside of mobile phone coverage area at any one time). Project members who receive a security instruction should confirm receipt without delay, so that the Project Coordinator or designate knows that the message has gone through.

For such a system to be effective, all project members must also be able to communicate threats or other security concerns to the Project Coordinator or designate. A separate channel or group on the messaging app can be used for this, to ensure that communication does not get lost in other project communications. That channel or group would need to be tested regularly to ensure that it functions effectively. A call tree (or phone tree) whereby one person in the project contacts the next according to a set schedule can be used in case using a messaging app is not possible. However, be aware that such trees may easily fail, for example, if a person does not answer a call or does not forward the relevant information.

If you decide to use a messaging app, consider the stability and security of the different apps that are available. Do not automatically go for whatever app is commonly used by the project staff and in the country – if another messaging app is preferable for use during the project, make sure that all relevant staff download it and get familiar with using it.

Field Monitors and other project members should also be provided with set responses to answer questions about their monitoring activities. If any security concerns or threats arise, they should be trained to disengage and cease monitoring, get themselves to a safe location and report the issue as discussed above.

Step 8. Develop mechanisms for monitoring and evaluation

Focus of this chapter: Showing the importance of monitoring and evaluation of your work, and how this can be done in practice

Content of this section:

- The importance of monitoring and evaluation of your CFM project
- How to monitor and evaluate your work while the project is ongoing
- How to evaluate the work once the project has ended

Why monitoring and evaluation is important

It is essential while monitoring campaign finance that you monitor the quality of your work and evaluate it carefully. Evaluations should be made during the monitoring project to ensure that the work is carried out without bias and according to the set plan, and after the project is completed so that lessons can be learned for future CFM projects.

Monitoring the work in the CFM project is normally the responsibility of the project core team members, who will need to issue careful instructions to all involved regarding the data that needs to be collected. Where the CFM project includes PET (see Chapter 3), the data analyst (see page 99) should be instructed to carefully monitor the data that is coming in as expected from field monitors and raise any concerns immediately.

Evaluations of the collected data should be done during the monitoring project. This can be a very informal process carried out during core team meetings, or a formal approach can be taken where someone not involved in the project is hired to do so.

FIGURE 27. MONITORING AND EVALUATION

Monitoring

Ongoing tracking of the quality of work using performance indicators

Evaluation

Reviewing work to see if desired outcomes and impacts were achieved (if not, why not) and lessons for future improvements

Monitoring and evaluation during the CFM project

Verifying unit costs for PET

Starting on page 17, we discussed how Parallel Expense Tracking (PET) can be used to make estimates on the amounts that contestants (or non-contestants) spend on their election campaign. Starting on page258, we explored how unit cost estimates can be established that allow the monitoring team to put a price tag on the campaign materials and activities that are observed.

The campaign spending estimates arrived at through PET will be incorrect if the unit cost estimates are wrong, and therefore it is important to control the accuracy of the cost estimates. For this, contract someone not working with the project to independently establish unit cost estimates for spending categories you expect will be used frequently in the campaign, and compare these estimates with those originally established. You may not get an exact match between the original estimate and the independent verification. That is ok – where you should be concerned is if the independent verification arrives at a significantly lower estimate than the one done for the project. This is since (as discussed above), the PET methodology is used for establishing minimum estimates of campaign spending, and it is therefore problematic if the unit cost estimates are exaggerated.

Table 23 below shows the actual original unit cost estimates and the independent verification estimates established in a PET project covering a parliamentary election.

TABLE 23. EXAMPLE OF UNIT COST VERIFICATION FOR PET

Item	Cost estimate *monitoring group*	Cost estimate *External evaluator*	Comment
Color poster A3 size	$5	$5	Monitoring group makes no distinction between color and black and white posters
Color banner 2 x 4 m	$40	$50	Variation acceptable
Renting venue in mid-range hotel (2 h, capacity 200 people)	N/A	$400	Monitoring group has not yet made an estimate for this
TV advertisement Channel 1/Channel 2(30 sec)	$250	Channel 1, $240 Channel 2, $255	These are overall estimates. Exact amount will differ according to time and type of program to which the advert connects

Early monitoring evaluation

It has proved valuable in several CFM projects to deploy field monitors after their training and have them start monitoring, but to then stop the monitoring and gather all the Field Monitors (within a few days or a week of monitoring). The reason is that there may be some unclarities or misunderstandings that cannot be detected until the actual monitoring starts and the Field Monitors have confronted the reality of their work. A similar approach can be valuable for Media Monitors, who, may for example detect that no advertising appears on the channels or times they have been asked to monitor. It is important that evaluations of this kind are short and that any detected errors are solved quickly, to avoid significant gaps in the monitoring.

There are various approaches to verify the work of monitors during the monitoring period. In the 2020 JDPMC monitoring project, monthly validation meetings were held where the monitors presented and explained the monitored data.[233]

Using a rumor tracker

Before starting monitoring of any aspect of campaign finance, the monitoring group should discuss what information is required before the group investigates the accuracy of an accusation or information received about a campaign finance violation. It is also useful to decide what information is required (from external sources or investigations by the monitoring group) before the group publishes this information in its reports or in other formats.

Even if you decide on the information needed to follow up on an accusation, and for whether a case should be reported, it is often difficult to ensure that these criteria are followed identically in every case. Some groups carrying out CFM projects have found it valuable to create a document for tracking rumors or accusations that they come across during the reporting period. In this document they collect any form of accusations, noting the source and whether or not they tried to verify the information.

The document will be full of rumors that may or may not be true, and a rumor tracker itself is therefore never made public. Doing so may give credibility to baseless rumors and may leave the monitoring group open to lawsuits for slander. However, this approach can be valuable for making sure that any potential violations are noted and followed-up on if there is reason to do so. This can help to ensure that the work is without bias against or in favor of any political party or candidate, and the information in this document can be valuable in developing the final report or other project output.

An example of what a document of this kind might look like is included below, using fictional information received in a made-up country. The column "follow-up" shows the decision that this fictional monitoring group took regarding whether it would investigate and try to find more information about an individual case. The column "result of follow-up" shows the result of this fictitious investigation and whether it was decided to report the case publicly or not. By using a table of this kind, the monitoring group can establish if the same criteria for following up on a reported case and for including a case in the CFM reporting have been followed for all cases.

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TABLE 24. FICTITIOUS EXAMPLE OF A RUMOR TRACKER

Date	Locality	Source	Accusation	benefitting party / candidate	Follow up?	Result of follow-up
12/10/2021	Newtown	www.fictionalnews.com	Unnamed party representative handed out money, promising to come back with more if they voted "the right way"	Truth party	**NO, Source frequently accuses party of violations, did not provide details to allow follow-up**	None. *Case closed.*
13/10/2021	Old square	Information via hotline by named resident of Old Square	Meeting at Old Square organized by Ministry of Education, supposed to announce new curriculum, but flags of People Party everywhere and with speakers urging electorate to vote for party candidate	People party	**YES, named source who is willing to testify about the event**	Photos on ministry website show flags of People Party. Several meeting participants and one ministry driver interviewed attested that campaigning took place. *Information about violation posted on Facebook page, reported to authorities & will be included in final report.*
24/10/2021	Old City	Phone call to Field Monitor by named source	Candidate from Great Party received significant donation from foreign source	Great party	**YES, named source made credible accusation on potential violation**	Contacted candidate and concerned bank. Both however refused to cooperate, and accusation therefore not possible to confirm. *Case closed.*

Evaluation after the CFM project has ended

It is also valuable to develop an internal evaluation report after the CFM project has finished and the final report (if any) has been made public. A summary can be made public to assist other CSOs wishing to carry out similar monitoring in other countries or in future elections.

The post-monitoring evaluation can be more thorough than what can be carried out during the monitoring, as the actual work with the CFM project will have ended. It can be done by members of the core team or by someone who was not involved in the project. The latter reduces the risk of bias and provides an outside perspective on the work, but it is especially important that this person or persons are provided with all available materials and are able to hold discussions with anyone who was involved in the project. If it is anticipated that an external evaluation will be carried out after the CFM project has ended, it is valuable to consider in advance what data should be collected during the planning and monitoring phases. This information can be put in a separate folder on a shelf or in a computer.

An evaluation report could cover the following issues, among others:

TABLE 25. ISSUES TO BE ADDRESSED IN EVALUATION REPORT

Issue	Comment
A description of the methodology and how this was arrived at, including the considerations that were taken during the preparations	Turnover within the organization may mean that once it is time for the organization to do monitoring again, the people involved may not be available. Careful record-keeping of what worked can therefore is extremely useful, even if it seems unnecessary at the time.
Lessons learned about the methodology	Outline what did and did not work, so that lessons can be learned for forthcoming monitoring efforts. Be as frank and direct as possible.
Recommendations for future monitoring efforts	No project is ever perfect. Make recommendations for things that should be changed in the future. Remember to also make recommendations on things that should not be changed if they worked well.
Discuss potential challenges in scaling up the pilot methodology	If the project was a pilot to test the methodology (as many have been), discuss what challenges may be faced when scaling the approach, and how these challenges can be overcome. Consider particular challenges regarding internal communication and how the quality of the monitoring can be controlled.
Budgetary issues	Did the actual costs match the budget? Where there any unforeseen costs or savings? Also, discuss how economies of scale can be made if you are going to scale the methodology. This is especially important if a pilot CFM project is carried out – if this project covered two regions and included 20 field monitors, what would be the costs if you cover five regions with 50 field monitors next time?

Summary of recommendations and final remarks

Purpose of this chapter: Summary of recommendations and final words to encourage CSOs to carry out CFM.

Content of this section:

- Summarizing recommendations on CFM from all sections of this guide
- Highlighting "top recommendations" collected from people who have carried out past CFM projects

Hopefully, this guide has inspired you to engage in the monitoring of campaign finance in your country. Below is a summary of main recommendations from throughout this guide, organized according to the eight steps for identifying a monitoring methodology (Developing a monitoring methodology in eight steps on page 6).

Steps 1-3. Identify the long-term political finance goals, problems to address and desired outcomes

Developing your campaign finance methodology

- Make sure that you develop your monitoring methodology in advance. When you have a clear plan, you can be flexible to adjust to situations that arise without losing focus. Draw on the experiences from earlier monitoring in your country and in countries in a comparable situation. See *Developing a monitoring methodology in eight steps* for more information.

- Your monitoring methodology should directly flow from the goals, outcomes and campaign finance problems that you wish to address through the project.

Step 4. Decide on monitoring approaches

Monitoring campaign funding and spending

- If you plan to monitor the spending by electoral contestants, consider using the Parallel Expense Tracking Methodology (PET) outlined starting on page 17.

- However you go about monitoring campaign spending, make sure that your methodology stands up to careful scrutiny, and only publish minimum estimates on spending so that you err on the side of caution.

- Monitoring campaign income may produce remarkably interesting results, but it is generally much more difficult than monitoring campaign spending. Consider the options for such monitoring in your country, bearing in mind that you will need a separate approach to how you monitor campaign spending (see page 37 for more information).

Monitoring the abuse of state resources

- Abuse of state resources is a persistent problem in many countries, and this can not only corrupt the election process, but also undermine confidence in the whole democratic process and lead to a massive waste of limited public resources. Legal provisions often have limited impact on these abuses, and CSOs have a significant role in raising awareness. If you wish to engage with this issue, consider what forms of abuse are the most common in your country, and design your monitoring approach accordingly. (See page 42 for further information.)

Monitoring vote buying

- If you wish to monitor vote buying, consider to what extent such practices consist mainly of direct transactions between politicians and voters, or rather as part of complex relationships between politicians as patrons and of voters as clients. The forms of vote buying in your country will determine the most suitable form of monitoring. (See page 65 for further information.)

General recommendations regarding monitoring approaches

- Think about what other aspects of campaign finance may be worth considering in your country, such as hidden advertising (see page 70 for further information.)

- Whether you are monitoring abuse of state resources, vote buying or hidden advertising, putting a price tag on these activities can help draw attention to their importance. However, you must also realize that valuing such activities with any confidence can be exceedingly difficult.

Analyzing gender and campaign finance

- Adopting a gender perspective on campaign finance can make the monitoring more comprehensive and reflective of the impact of money in the political process on everyone in society. (See page 76 for further information.)

Step 5. Set delimitations for monitoring

- Do not try to cover everything in your CFM project. Doing something limited well is better than trying cover everything and fail. Decide the delimitations of your project in advance to ensure that the work is manageable and consistent. (See further in *Step 5. Set delimitations.)*

Step 6. Identify project outputs

- There is a risk that CFM projects focus almost exclusively on the monitoring and the collection of data, without much thought given to how the collected information will be disseminated. Whether your main goal is to raise public awareness or to reach members of parliament to advocate for legal reform, think about how best to get your message across. (See page 88 for further information.)

Step 7. Plan for effective project management

- Try to anticipate in advance any organizational challenges that may arise, and plan ahead. Everyone involved in the CFM project must know their role and what is expected of them. Consider, in particular, the communication between project members and potential security concerns. (See *Step 7. Plan for effective project management* for further information.)

Step 8. Develop mechanisms for monitoring, evaluation and learning

- It is likely that political actors covered by the CFM project will seek to deflect the findings by seeking to undermine the credibility of your work. Make sure that you carefully control the quality of the monitoring, so you can detect and correct any potential inaccuracies. (See *Step 8. Develop mechanisms for monitoring and evaluation for further information.*)

As you have likely surmised from this guide, monitoring campaign finance can be complicated. Do not let that dissuade you from monitoring campaign finance in your country in the next election. By doing this you will contribute to the democratic future of your country and help pave the way for a more transparent and controlled role of money in your political process.

Finally, we asked a number of experienced civil society activists from around the world for their most important advice to groups wishing to engage in the monitoring of campaign finance. Here are some of their responses:

Start monitoring early – once the official campaign starts, a lot of things will happen long before the elections, and if you start monitoring too late you will miss it (activist from North Africa).

Remember to have solid legal advice available – without people who know the law you will not be able to say when violations have occurred (activist from Western Asia).

The keys to a successful observation process are good preparation and education of coordinators, observers' training, developing mutual trust and good communication between the two, as well as constant engagement (activist from South-Eastern Europe)

Anyone who wishes to in engage in monitoring of campaign finance needs to make sure their project be should be governed by acts and/or bound by regulatory provisions by concerned election authority (activist from South Asia)[234]

Any group wishing to engage in the monitoring of campaign finance must build cordial relationships with all forms of media, be it print, broadcast or social media, especially notable bloggers in order to get firsthand, valid and reliable information on campaign activities such as mega rallies, meetings, advocacy visits and spending of political parties and candidates (activist from sub-Saharan Africa).

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[234] It can be argued that campaign finance monitoring can also be carried out fully without such acts or regulatory provisions, as long as it is not explicitly forbidden. Acts specifically providing for campaign finance monitoring by CSOs may be useful, but they do not exist in any country. It is, however, completely correct that a good working relationship with the oversight institution(s) is highly desirable (see page 73).

Appendices

Quicklist for developing a CFM methodology

This quicklist is meant to help you develop a CFM methodology by making sure that you have thought about all key issues, based on the eight steps outlined in *Developing a monitoring methodology in eight steps*. The last column gives basic information and refers to the places in this handbook where each step is discussed at length.

No.	Step	Your decision	Comment
1	Long-term goal(s)		This should be the long-term change which your project should contribute to (for example, reduced corruption, reduced role of money in politics, increased transparency). You may not be able to measure this change or prove that your project led to this change. See further on page 9.
2	Campaign finance problems to address		While most countries have various problems with campaign finance, it is important to focus only on one or a few (for example, lack of compliance with regulations, spending above set limits, vote buying or abuse of state resources). See further page 11.
3	Desired outcome(s)		This is the short to medium term change that you want to see in/by others as a result of this project (for example legal change, increased awareness, or increased compliance with regulations). It should be possible to measure change in this area. See further on page 13 .

No.	Step	Your decision	Comment
4	Monitoring approaches		There are different approaches of monitoring campaign finances, and it is crucial to identify those most relevant to the aims of your project, the problems you wish to focus on and the context of your country and organization. See further starting on page 15.
5	Delimitations		Focus your work so that you do not try to cover everything (and fail in the attempt). Common delimitations include focusing on some electoral contestants, geographical areas and/ or a certain time period. See further on page 82.
6	Output		The results from the monitoring must be presented in a way that maximizes the chances of reaching the long-term goal(s) (step 1) and desired outcome(s) (step 2). Outputs can include preliminary and final reports, but also press conferences, blogs, YouTube clips and Twitter campaigns. See further on page 88.
7	Project management		Many practical issues must be addressed, with the most important arguably being the project structure (staffing), training, communication flow and budgeting. These issues are discussed at length starting on page 94.
8	Monitoring and evaluation		Finally, any projects should monitor the quality of the work, and evaluate it to make sure that the monitoring will be even better next time. See further on page 108.

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Sample Checklists

Below you can find sample checklists that may be used in campaign finance monitoring. These are referenced throughout this guide.

Checklist 1. Campaign events

Monitor		Area		Locality		Subm. date		Monit. date		Arrival time		Departure time	

	1	Party/ candidate							
General	2	Type of event							
	3	Location of event	Area		District			Location	
	4	Type of venue	Public (X)		Private (X)	Don't know (X)		Comment	
	5	Start & end time of event	Start		End	Monitored? (X)		Comment	
Spending	6	Number of participants	Number			Comment			
	7	Organizing staff	Party/candidate		Venue		Others		Comment
	8	Drinks provided	Type		Quantity	Description			Comment
	9	Food provided	Type		Quantity	Description			Comment

10	Entertainment	Person		Activity		Time active		Comment

11	Transport (for each vehicle)	Purpose	Type	Ownership	Plate	Destination	Est. distance	Comment

12	Communication systems	P/A system (details)		Video system (details)	Other (details		Comment	

13	Furniture etc.	Chairs		Tables	Tents		Other	Comment

14	Handouts	Type	Quantity	Description			Comment	
		T-shirts						
		Pens						
		Caps						
		Cash						
		Other 1						

			Other 2				
			Other 3				
Public resources	15	Public servants, *active* participation	Person	Position	Activity	Work hours (X)	Comment
	16	Public servants, participation	Category	Number	Work hours (X)	Comment	
	17	Public resources handed out	Material	Quantity	Comment		
	18	Public resources used	Material	Quantity	Comment		
Other	19	Other comments					

Checklist 2. Public institution events

Monitor		Area		Locality		Subm. date		Monit. date		Arrival time		Departure time	

<table>
<tr><td rowspan="10">General</td><td>1</td><td>Type of event</td><td colspan="6"></td></tr>
<tr><td>2</td><td>Location of event</td><td colspan="2">Area</td><td colspan="2">District</td><td colspan="2">Location</td></tr>
<tr><td></td><td></td><td colspan="2"></td><td colspan="2"></td><td colspan="2"></td></tr>
<tr><td>3</td><td>Type of venue</td><td>Public (X)</td><td>Private (X)</td><td>Don't know (X)</td><td colspan="3">Address</td></tr>
<tr><td></td><td></td><td></td><td></td><td></td><td colspan="3"></td></tr>
<tr><td>4</td><td>Start & end time of event</td><td>Start</td><td>End</td><td>Monitored? (X)</td><td colspan="3">Comment</td></tr>
<tr><td></td><td></td><td></td><td></td><td></td><td colspan="3"></td></tr>
<tr><td>5</td><td>Number participants</td><td colspan="3">Number</td><td colspan="3">Comment</td></tr>
<tr><td></td><td></td><td colspan="3"></td><td colspan="3"></td></tr>
<tr><td rowspan="11">Campaigning</td><td>6</td><td>Presence of candidates</td><td colspan="2">Name</td><td>Party</td><td>Activity</td><td colspan="2">Comment</td></tr>
<tr><td></td><td></td><td colspan="2"></td><td></td><td></td><td colspan="2"></td></tr>
<tr><td></td><td></td><td colspan="2"></td><td></td><td></td><td colspan="2"></td></tr>
<tr><td></td><td></td><td colspan="2"></td><td></td><td></td><td colspan="2"></td></tr>
<tr><td>7</td><td>Presence of party personnel</td><td>Name</td><td>Party</td><td>Position</td><td>Activity</td><td colspan="2">Comment</td></tr>
<tr><td></td><td></td><td></td><td></td><td></td><td></td><td colspan="2"></td></tr>
<tr><td></td><td></td><td></td><td></td><td></td><td></td><td colspan="2"></td></tr>
<tr><td></td><td></td><td></td><td></td><td></td><td></td><td colspan="2"></td></tr>
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<tr><td></td><td></td><td></td><td></td><td></td><td></td><td colspan="2"></td></tr>
</table>

			Type	Quantity	Candidate/party	Comment
	8	Campaign materials				
	9	Public materials distributed in name of candidate/party?	Type	Quantity	Candidate/party	Comment
	10	Campaign materials handed out?	Type	Quantity	Candidate/party	Comment
	11	Did any speaker make campaigning remarks?	Person	Comment (give details		
	12	Other				

(Left margin label: Campaigning, continued)

5

Checklist 3. Billboards and banners

Monitor		Area		Locality		Subm. date		Monit. date		Arrival time		Departure time	

Note: For each billboard/banner, assign a number and give details about its location and, if known, the advertising company. Then place the number of the party/candidate in the box that represents the type of that particular billboard/banner. Use another sheet if needed.

No.	Location	Advertising company	Billboards								Banners		
			Commercial				Private						
			Small	Medium-small	Medium-large	Large	Small	Medium-small	Medium-large	Large	Small	Medium	Large

Checklist 4. Posters

Monitor		Area		Locality		Subm. date		Monit. date		Arrival time		Departure time	

For each location where posters are found, note the quantity of posters in each category, using one line per contestants.

No.	Location	Contestant	Advertising company	Small		Medium		Large	
				Color	**B&W**	**Color**	**B&W**	**Color**	**B&W**

Checklist 5. Public institution

Monitor		Area		Locality		Subm. date		Monit. date		Arrival time		Departure time	

<table>
<tr><td rowspan="5">General</td><td>1</td><td>Type of institution</td><td colspan="9"></td></tr>
<tr><td>2</td><td>Location of Institution</td><td colspan="3">Area</td><td colspan="3">District</td><td colspan="3">Location</td></tr>
<tr><td colspan="2"></td><td colspan="3"></td><td colspan="3"></td><td colspan="3"></td></tr>
</table>

	3	Campaign materials on display	Type		Quantity	Location		Party/candidate	Comment	

	4	Other form of campaigning	Type			Comment	

	5	Presence of candidate/ party official			Comment	

	6	Other	

(left label: Campaigning)

Checklist 6. Print media advertising

Monitor		Date subm.		Other	

No.	Contestant	Media	Date	Page	Size	Color or b/w	Type	Comment

Checklist 7. Broadcast media advertising

Monitor		Date subm.		Other	

No.	Contestant	Channel	Date	Start time	End time	Length	Type	Comment

Checklist 8. Online media advertising

NB. It is particularly difficult to create a sample checklist for online media monitoring given that the relevant variables may vary between outlets and countries. In many situations, tools such as CrowdTangle (see page 35) may be more useful.

Monitor		Date subm.		Other	

No.	Contestant	Outlet	Date	Variable 1	Variable 2	Variable 3	Type	Comment

Checklist 9. Other campaign activities

Monitor		Date subm.		Other	

No.	Contestant	Date	Activity	Quantity	Comment

Glossary

Abuse of state resources	The undue advantages obtained by certain parties or candidates, through use of their official positions or connections to governmental institutions, to influence the outcome of elections.[235] See page 42.
Campaign activities	An election campaign consists of many activities. For example, if a candidate arranges 10 public meetings, buys one TV advert and nine newspaper adverts and prints 1,000 posters, each of these constitute one activity (the 1,000 posters count as one, not 1,000 activities).
Campaign events	Special events carried out during election campaigns such as rallies, concerts, festivals and other types of meetings with potential voters.
Contestant	A political party, coalition, list, citizen initiative presenting candidates, or a candidate participating in an election.
Delimitation	Any manner in which the monitoring is limited through prior decisions so that you do not attempt to monitor all campaign expenses. This can be delimitation of the candidates/parties monitored, the expense categories included or limitations in time or geographical area. See page 82.
Expense categories	Types of spending that political parties and/or candidates may engage in, such as advertising in electronic or printed media, the production and distribution of banners, posters, leaflets, etc.
Extrapolation	Using available information to make estimates regarding larger contexts by expanding or extending known data. For example, if we observe that a contestant spends one million of the relevant currency in one of the ten regions in a country, an extrapolated estimate would be that he spends ten million in total. See page 35.
Hidden advertising	Instead of paid advertisements, political actors buy (or are given) favorable coverage in news and other broadcasts in electronic or printed media. Such advertising is a common phenomenon in some countries, but normally not included in PET projects. See page 70.
Non-contestant campaigner	An entity other than a political party (or coalition/list/citizen initiative presenting candidates in elections) or candidate, that spends money on election campaigns. See in particular page 32.
Online media	Internet and social media resources including both international platforms such as Facebook, Google, Instagram and TikTok and domestic websites and online news outlets.
Parallel expense tracking (PET)	A methodology whereby an external actor (normally a civil society organization) gathers information about the electoral spending by political parties and/or candidates, independently of financial reports that these actors may submit to an oversight institution. See page 17.

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[235] OSCE/ODIHR (2015) page 68.

Political finance oversight institution(s)	The public (government) institution(s) legally mandated to oversee compliance with political party and/or campaign finance regulations. This can include receiving, reviewing and publishing financial reports. This role is often given to an EMB, anti-corruption agency or state audit institution, and in some countries, the mandate is split between several institutions. See page 73.
Project Coordinator	The person with the overall responsibility for a campaign finance monitoring project. See page 98.
Public institution	Any entity belonging to or formally controlled by a central, regional a local government entity.
Public institution event	Event organized by a public institution to inform or engage the public, including the launch of new public initiatives or the celebration of a national holiday. See page 56.
Submitted financial reports	This refers to financial statements that political parties, coalitions, lists, citizens groups or political parties have submitted to a government oversight institution in line with legal requirements.
Third party	See non-contestant campaigner.
Unit cost	The estimated cost per campaign activity: such as the cost for a 30-second advert on a particular TV station at a certain time, or for booking the town hall for a day for a campaign rally; or for printing one A2 color poster.
Vote buying	Gifts or promises to influence how persons vote, or whether they vote. See page 65.

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