



## EU EOM GUIDELINES FOR OBSERVING ONLINE ELECTION-RELATED CONTENT

(Updated, March 2025)

### Introduction

The Internet has notably increased the possibilities to receive and impart information, opening new forms of political expression and participation, especially through online social media platforms and instant messaging services. Online communication entails both new channels for enhancing the inclusivity and transparency of the election and new forms of threats to the integrity of the process. EU EOMs observe, analyse and offer a balanced assessment of both subject matters and examine how rights and obligations are applied in the online campaign by election stakeholders, such as election management bodies (EMBs), parties and candidates, civil society groups and voters.

Positive aspects of online election-related communication include, but are not limited to, a timely dissemination of information of public interest to broad audiences, including civic education, voter information and mobilisation; new opportunities for voters to engage with electoral contestants directly; opportunity for lesser known campaign and candidates to gain visibility; possibilities for under-represented or marginalised groups to make their voice heard and an opportunity to use online fora for a pluralistic debate on election-related matters.

Negative aspects of online election-related communication include, but are not limited to, a proliferation of information manipulation operations, polarising narratives and harmful content; illegal or privacy-invasive practices; circumvention of campaign finance rules and online harassment and intimidation. Targeted prosecution of and pressure on online activists by State and non-State actors is another common threat to the freedom of expression that cannot be overlooked.

Like other aspects of an election observation, the analysis and assessment of online election-related communication requires a robust and transparent methodology defining the scope of the observation, based on clear benchmarks for drawing conclusions and recommendations. For such an analysis and assessment to be credible, it has to be consistent and based on the highest standards for accuracy of information and impartiality of analysis.<sup>1</sup>

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<sup>1</sup> The Declaration of Principles for International Election Observation (DoP) states that international election observation “*is the systematic, comprehensive and accurate gathering of information [...]; the impartial and professional analysis of such information; and the drawing of conclusions about the character of electoral processes based on the highest standards for accuracy of information and impartiality of analysis*”.



The guidelines elaborate on how EU EOMs incorporate observations and analysis of the online election-related communications in their overall assessment of the electoral process against international standards and commitments; what benchmarks the missions use to evaluate compliance with those fundamental principles in the online space; and how missions overcome challenges related to the monitoring of online platforms during the campaign.

The EU EOMs should also keep in mind that social media monitoring (SMM) and its methodological framework is constantly evolving. In this regard, it is important to follow ongoing progress.<sup>2</sup> Against this context, while these guidelines are an attempt to ensure consistency among the EU EOMs, it is also intended as a “living document” that will be updated to reflect the emerging trends, international standards and good practices in this area.

## 1. International standards and principles

EU EOMs’ assessment of elections rests on international and regional human rights instruments, commitments, and good practices concerning, *inter alia*, freedom of expression, the right to political participation, right to privacy and freedom from discrimination. Consequently, digital election-related content, online campaigns and respective laws and regulations should be assessed for compliance with those applicable international standards and commitments. Subject matters not specifically articulated in international legal instruments, should be assessed against guidelines and good practices, established through and by international and regional organisations.

Overall, international human rights standards provide a framework through which to assess numerous elements of digital election-related content. However, detailed legally binding instruments for certain areas are not uniformly in place yet. Consequently, an EU EOM has to distinguish between an assessment against international standards and a mere description and analysis of the online election-related content, including digital campaigns.

**Freedom of expression:** this right is a key reference to assess the online campaign. Several global and regional instruments and internationally recognised statements interpreting them have concluded that **freedom of expression equally applies to offline and online**, including in relation to the elections. Restrictions to this right are legitimate only if they are provided for by law and conform to the strict test of necessity and proportionality to protect the rights of others, as recognised under international law, or to protect national security, public order and public health. Such limited restrictions may be applied with an aim and purpose to ensure freedom from discrimination, freedom from cruel, inhuman or degrading treatment and freedom from arbitrary interference with privacy. The assessment where freedom of expression ends and where permissible restrictions begin should be the same whether the content is online or offline.

**The right to political participation:** this right, together with the right to freedom of opinion, require that voters are able to form opinions independently, free of violence or threat of violence, compulsion, inducement or manipulative interference of any kind.<sup>3</sup> The application of the rights at issue must be effective not merely theoretical. In this context primarily, it refers to voters’ right if not to be shielded from, then to be informed about online campaign manipulations, including, but not

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<sup>2</sup> Since 2022, the EU passed several landmark legislative acts to regulate the digital space surrounding elections including the [DSA](#), the [Digital Market Act](#), the [Artificial Intelligence Act](#), the [European Media Freedom Act \(EMFA\)](#) and the [Transparency and Targeting of Political Advertising \(TTPA\)](#).

<sup>3</sup> CCPR General Comment No. 25, para 19.



limited to, information manipulation, and inauthentic behaviour.<sup>4</sup> Measures against intimidation, inducement and manipulation online should conform with the same strict test of necessity and proportionality, should include safeguards against the arbitrary application of power, and seek to prevent attempts by state and non-state actors to silence voices of dissent. Full enjoyment of the right to political participation should also be assessed in conjunction with the right to the security of the person.<sup>5</sup>

**Right to privacy and data protection:** international law requires States to take effective measures to ensure that individuals' personal data, including information about their private life and political preferences, is used lawfully and for authorised purposes with their consent, and that it does not reach the hands of persons who are not authorised by law to receive, process and use it.<sup>6</sup> In the context of social media monitoring, it primarily relates to assessment of targeted online campaigns, including through mobile applications designed by political actors and direct messaging. To accord with international law, measures should be taken to ensure voters' awareness of being subject to online targeting and of the extent to which their personal data is accessible and being used for campaign purposes. In sum, when processing personal data as part of election campaigning, users should be informed on how and for what purposes their personal data is used and stored, in a clear, accessible, and transparent way. The acquisition of such data must be carried out lawfully.

**Right to access to information:** international law recognises citizens' freedom to seek, receive and impart information and ideas of all kinds, regardless of frontiers and through any media of their choice. It also obliges states to proactively put in the public domain government information of public interest, as well as to make every effort to ensure easy, prompt, effective and practical access to such information. Consequently, the assessment of online ecosystem and election-related content should include the evaluation of both aspects:

**Access to Internet:** until now, access to Internet has not been recognised as a human right under international law.<sup>7</sup> However, the 2011 Joint declaration on freedom of expression and the Internet provides for a comprehensive set of guidelines concerning the right to access the Internet.<sup>8</sup> Efforts by state and non-state actors to enhance voters' access to online sources and to reduce digital divide within the society and promote Internet literacy may be evaluated against those guidelines.

**Access to information (published online):** regulations of online content and provisions for blocking and filtering it should be examined in conjunction with the overall respect for freedom of expression and permissible restrictions on it. Assessment of respect for this principle should also include an evaluation of actions and inactions of relevant state bodies to ensure voters' access to comprehensive, pluralistic, information on electoral matters. International law recognises voter education and registration campaigns as necessary prerequisites for an effective exercise of the right to vote. Promotion of media and digital literacy is recognised as an effective measure to reduce the detrimental effect disinformation campaigns have on voters as well as to enable political participation.

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<sup>4</sup> See UN, OAS, OSCE Joint declaration on freedom of expression, disinformation and propaganda and Joint declaration on freedom of expression and Elections in digital age.

<sup>5</sup> ICCPR art. 9.

<sup>6</sup> ICCPR art. 17 and CCPR General Comment No. 16.

<sup>7</sup> Some national legislation recognises access to the Internet as a basic human right or as a key component of the right to freedom of expression.

<sup>8</sup> Available at <https://www.osce.org/files/f/documents/e/9/78309.pdf>.



**Transparency:** public trust in the fairness of elections and hence in its credibility, is primarily based on transparency and accountability of election management bodies and subsequent access to information of public interest. This principle has also become key in online campaign regulatory efforts. As deceptive and misleading practices distort voter perceptions and hamper access to diverse and accurate information, citizens must be aware of the nature of the content and messages received, the reasons why they are targeted and the identity of counterparts they interact with. Transparency has also emerged as a key principle in assessing campaign finance, including spending on digital campaigns and disclosing the sources of their financing. The effectiveness of transparency and accountability measures introduced by state and non-state actors (political parties, the media, etc.) should be assessed in conjunction with right to information, right to equality of opportunity and non-discrimination.

**Equality and freedom from discrimination:** in the context of online campaign this right primarily relates to discriminatory language, hateful content and derogatory speech and incitement to violence against specific communities and groups. Those elements of online election-related communication should also be assessed for compliance with the prohibition of advocacy of national, racial, religious or sexual-orientation based hatred. Violation of this right may lead to widespread intolerance, could trigger conflict and violence, and may exclude certain groups from the online debate and offline political participation. Candidates who become a target of this kind of speech may be forced out or discouraged from participating in the election. In parallel, there are increasing concerns related to tech companies automated decision-making, which may result in an inadvertent discrimination against specific social, ethnic or religious groups.<sup>9</sup> The latter, however, remains difficult to assess. The latest international community recommendations to the States also include putting in place clear requirements and policies to ensure respect for the principle of net neutrality.<sup>10</sup>

**Right to an effective remedy:** this right requires state institutions, such as courts, EMBs, electoral tribunals or regulatory bodies, to ensure effective and timely remedies to address the violations of voters' or candidates' rights online. Additionally, voluntary compliance measures for content moderation and removal adopted by social media companies should ensure that legitimate, accessible, predictable, equitable, transparent, rights-compatible complaint mechanisms are available to users whose accounts have been suspended or contents removed.<sup>11</sup>

Given that the online sphere is dominated by a few major companies and regulated through their terms of service and community standards as well as the way they programme their products, **the UN guiding principles on business and human rights** can be applied in relation to both state's and companies' responsibility to respect human rights.<sup>12</sup> Those principles stem from "*a global standard of expected conduct for all business enterprises wherever they operate*", making clear that business should respect human rights and envisage measures to ensure adherence.

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<sup>9</sup> For instance, search engines might systematically down rank results related to a certain group or associating crimes largely with a given community.

<sup>10</sup> UN, Report of the Special Rapporteur on the promotion and protection of the right to freedom of opinion and expression A/HRC/35/22 2017; European Commission, COMPACT Principles for internet Policy and Internet Governance; G8, Deauville Declaration Section II Internet para. 5; OECD Council, Recommendations on Internet Policy Making.

<sup>11</sup> Report of the Special Rapporteur on the promotion and protection of the right to freedom of opinion and expression A/HRC/17/27 2011.

<sup>12</sup> UN Guiding Principles on Business and Human Rights, adopted by the UN Human Rights Council in 2011.



**Summary table of principles and main international standards**

<b>GENERAL PRINCIPLE</b>	<b>MAIN INTERNATIONAL COMMITMENTS/STANDARDS</b>	<b>AREA OF ASSESSMENT/OBSERVATION</b>
<b>Freedom of expression</b>	ICCPR art. 19 CCPR General Comment No 34	Content regulation, including hate speech, defamation, and disinformation
<b>Right to political participation</b>	ICCPR art. 25 CCPR General Comment No 25	Information manipulation, including inauthentic behaviour, disinformation Political suppression, intimidation, threats Derogatory speech, hateful content Platforms' transparency on recommendation and moderation algorithms, access to data for scrutiny, transparency reports.
<b>Privacy and data protection</b>	ICCPR art. 17 CCPR General Comment No 16 CCPR General Comment No 34	Data acquisition and processing Micro targeting Profiling
<b>Access to information</b>	ICCPR art. 19 CCPR General Comment No 34	Access to the Internet, including filtering and blocking Election information, including about campaign financing Voter education Media and digital literacy
<b>Transparency</b>	United Nations Convention against Corruption	Election-related advertising Sponsored content Information manipulation, including microtargeting, bots, fake accounts
<b>Equality and freedom from discrimination</b>	ICCPR art. 3 CCPR General Comment No 18	Derogatory speech, hateful content Incitement, suppression of certain groups of voters Net neutrality
<b>Right to an effective remedy</b>	ICCPR art. 2.3 CCPR General Comment No 31	Election dispute resolution Social media platforms voluntary compliance measures Social media platforms' reporting system and appeal mechanisms

## 2. Methodological framework

With the increasing use of Internet and online platforms to disseminate election-related content, the EU EOMs are also called to observe, analyse and assess the role of online platforms in elections. Relevance of this analysis and assessment will vary and its scope will depend on the human and financial resources available to the mission.

The EU exploratory mission (ExM) conducts a preliminary review of the legal framework related to digital rights as well as an analysis of the online ecosystem and context. The legal framework related to digital rights and freedom of expression online is assessed as part of the electoral legislation. The EU EOM observes, analyses and assesses the online environment which entails more than just following electoral contestants' online activities and monitoring trending election-related topics on social media. Hence, the EU EOM analyses and assesses a range of issues related to digital election-



related content, online campaigns and the online ecosystem as a whole. This chapter identifies methods of observation and areas the EU EOM is expected to observe, analyse and assess.

## 2.1 Methods of Observation, Analysis and Assessment

EU EOMs use different and complementary approaches and techniques to gather information on online election-related content and the campaign:

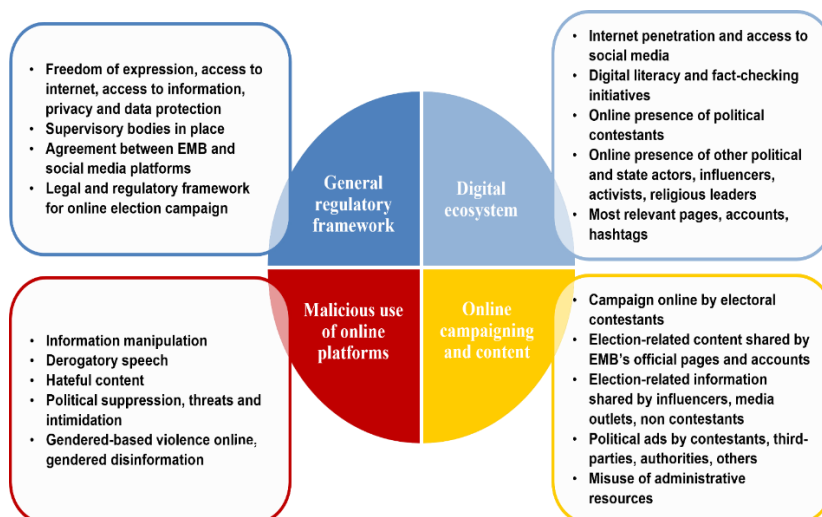
- **Qualitative and quantitative data analysis** resulting from the EU EOM social media monitoring;
- **Meetings and interviews with relevant stakeholders** to provide information on certain elements of the online ecosystem, campaign and context;
- **Long-term observer (LTO) engagement** may broaden the EU EOM's scope of assessment, especially if observing general elections where region-specific campaigns prevail;
- **Cross-checking mission's findings with domestic and international monitoring initiatives** through CSOs (specialised or not in electoral related online content), the EMB, other relevant supervisory bodies and/or international technical electoral assistance programmes. This will help to contextualise the relatively short-term monitoring of the EU EOM and to ensure a solid, fact-based analysis and assessment.

## 2.2 Areas of Observation, Analysis and Assessment

Electoral campaigns online are shaped by legal and regulatory instruments, implementation of the law and other relevant practices, the cooperation between EMB and social media platforms, civil society, and state institutions, and by the overall environment in which an election takes place. Further aspects, such as host country's ethnic composition and urban-rural, gender and digital divide have to be considered to produce a comprehensive analysis and assessment.

There are four main areas of observation each of which comprises several subjects. The chart below will help the SMA to devise a basis for the observation of online election-related content.

### Methodological Framework Chart





**General regulatory framework**

This includes an assessment of the overall respect for fundamental rights and freedoms online, national legal and regulatory framework as well as other election-specific legal and voluntary (self-regulatory) instruments, such as codes of conduct. This assessment should cover both the legal framework as such and its implementation in practice. Assessments related to this area of observation will primarily be based on legal analysis and meetings with relevant interlocutors.

Subject	Description	Legislation, data and processes to be reviewed and observed
<p><b>Freedom of expression, access to internet, access to information</b></p>	<p>While having a legitimate aim, often antiterrorism legislation, defamation laws, anti-disinformation and anti-false news laws are used by state authorities to target digital activists and to curb freedom of expression online. The EU EOM assesses the overall legal framework related to freedom of expression online for compliance with relevant international standards (see Chapter I). This includes an assessment whether the cyberspace is free from arbitrary or excessive restrictions (for example blocking access to and filtering of social media platforms or websites); to what extent people can access the web without impediments, receive and impart information without undue restrictions and whether limitations on freedom of expression comply with international standards. Provisions for implementation of legal and statutory restrictions should also be reviewed for compliance with international standards and good practices.</p>	<ul style="list-style-type: none"> <li>● The Constitution;</li> <li>● Antiterrorism legislation with a focus on restrictions placed on online content;</li> <li>● Defamation laws and/or Criminal Code, Military Code;</li> <li>● Anti-disinformation and anti-false news legislation;</li> <li>● Electronic crime laws;</li> <li>● Access to information laws;</li> <li>● Cyber harassment legislation;</li> <li>● Regulations for blocking and filtering online content, including the intermediary liability regime, and subsequent provisions for its implementation.</li> <li>● Media law</li> </ul>
<p><b>Privacy and personal data protection</b></p>	<p>Unsolicited use of voters’ personal data might make them vulnerable to pressure, intimidation, manipulation and can deter their participation. Hence, the EU EOM assesses provisions provided for by law and practices employed to ensure that voters’ privacy rights are protected. If possible, the EU EOM could assess if exploitation of voters’ personal data has the potential to undermine the integrity of electoral processes.</p> <p>If there is no data protection legislation, the mission should assess any practices that are introduced by relevant state agencies and political parties to protect privacy.</p>	<ul style="list-style-type: none"> <li>● Privacy and data protection legislation, concerning the use of personal information for campaign purposes;</li> <li>● If there is a data protection authority, whether it is independent, adequately resourced, has sufficient enforcement powers and know-how;</li> <li>● Other initiatives to protect privacy, such as awareness campaigns by state agencies, social media platforms, and nonpartisan advocacy groups;</li> <li>● How electoral contestants obtain and store voter data</li> </ul>





## EUROPEAN UNION ELECTION OBSERVATION

Subject	Description	Legislation, data and processes to be reviewed and observed
<b>Supervisory bodies</b>	<p>State institutions that have regulatory and oversight powers over the ICT industry and cybersecurity determine the overall conditions for online communications, including those related to elections. Hence, the EU EOM assesses the transparency and accountability in their decision-making process, particularly in relation to blocking access to websites, social media platforms and messaging services; regulator's independence from the executive; processes for appeal at administrative and judicial level and the supervisory body's overall impartiality and knowledge of the subject matter as well as its operational capacity.</p> <p>The EU EOM should also assess if supervisory bodies have sufficient powers to enforce the existing legislation and if they exercise those powers efficiently.</p>	<ul style="list-style-type: none"> <li>● The law governing the regulator;</li> <li>● The composition, responsibilities and selection process of the regulator;</li> <li>● Regulations and decisions issued and executed by the regulator, also, framework for blocking/unblocking websites, social media platforms and messaging services;</li> <li>● Accountability and transparency procedures;</li> <li>● The role of courts in the appeal process.</li> </ul>
<b>Legal and regulatory framework for the online election campaign</b>	<p>Often general campaign regulations are directly or indirectly extended to online content. Hence, the EU EOM assesses legal and regulatory instruments governing the conduct of the campaign. The EU EOM also assesses regulations applicable to other relevant stakeholders, such as advertising and media agencies and establishes whether such instruments are applicable to administrators of social media platforms. Those instruments can be divided into three groups:</p> <ol style="list-style-type: none"> <li>1) Provisions to limit various forms of illegal, harmful content;</li> <li>2) Provisions for the campaign timeframe and silence period;</li> <li>3) Campaign finance legislation - regulations for political advertising, spending/donation limits, disclosure requirements, and rules for third-party campaigning.</li> </ol> <p>The EU EOM should also review rules for the publication of online opinion polls.</p>	<ul style="list-style-type: none"> <li>● The law and subsequent regulations governing the campaign;</li> <li>● Campaign finance legislation;</li> <li>● Capacities (human, financial, technical) of the oversight body;</li> <li>● Codes of conduct;</li> <li>● Statutory and self-regulatory transparency requirements for candidates and parties;</li> <li>● Campaign finance transparency measures introduced by global tech companies (Meta, X/Twitter, Google);</li> <li>● Legal and practical safeguards against coordinated, harmful campaigning on social media platforms carried out by third parties and/or official accounts of electoral contestants.</li> </ul>

Subject	Description	Legislation, data and processes to be reviewed and observed
<b>Agreement between social media</b>	<p>Collaboration among EMBs, state agencies (data protection, cybersecurity, etc.), and tech companies is expanding across countries. Online platforms have established special election-related</p>	<ul style="list-style-type: none"> <li>● Formal and informal agreements between EMBs, other agencies and social media platforms;</li> </ul>





## EUROPEAN UNION ELECTION OBSERVATION

Subject	Description	Legislation, data and processes to be reviewed and observed
<b>platforms and relevant state authorities</b>	<p>response units in some regions and countries and may provide training for local authorities. The EU EOM assesses whether there is such cooperation, coordination and consultation. The mission should try to evaluate if such cooperation has a positive or negative effect on the freedom of expression online.</p>	<ul style="list-style-type: none"> <li>● Government-led initiatives against digital threats (fact checking and digital/media literacy campaigns);</li> <li>● The extent to which the EMB publishes information of public interest (decisions, election calendar, results, etc.) online (on their website, social media platforms) and whether the EMB uses other digital information dissemination tools;</li> <li>● Voter awareness campaigns (by EMB)</li> </ul>
<b>Measures taken by social media platforms ahead of the elections</b>	<p>The EU EOM should assess whether social media platforms have measures in place to protect election integrity in the host country (content moderation), if platforms comply with the national legal framework and with international obligations.</p> <p>The EOM should also verify whether social media platforms' offices are present in the host country and/or a temporary/permanent team is dedicated to that country for addressing complaints and signalling abuses (in some cases a national proxy could also represent the global tech company).</p>	<ul style="list-style-type: none"> <li>● The capacities that tech companies have in place for the host country;</li> <li>● What election-related information social media platforms publish on their own accord;</li> <li>● Campaign finance transparency measures introduced by global tech companies (Meta, X/Twitter, Google);</li> <li>● Legal and practical safeguards against coordinated, harmful campaigning on social media platforms carried out by third parties and/or official accounts of electoral contestants;</li> <li>● Voter awareness campaign, including during the voter registration period;</li> <li>● Steps taken by the social media platforms to inform the public on the implementation of their own standards and terms of service, including on de-platforming and down-ranking.<sup>13</sup></li> </ul>

<sup>13</sup> De-platforming is the removal of access to a site or service for delivering messages to an audience. It may include not just banning the user or discontinuing the service, but also removing any content the user previously created.



**Digital ecosystem**

This section should provide an overview and, when possible, an assessment of the social media ecosystem and digital communication in the host country, digital literacy and the use of social media platforms and other online sources by electoral stakeholders, including civil society organisations. The EU EOM should aim to cover both positive and negative aspects of the digital ecosystem. Assessments related to this area of observation are primarily based on desk research followed by meetings with interlocutors and analysis of data collected by the social media monitoring unit. At times legal document analysis will also be required.

Subject	Description	Legislation, data and processes to be reviewed and observed
<b>Overview</b>	<p>Being familiar with the digital ecosystem in the host country includes a fact-based account on internet penetration, digital literacy rate, use of smartphones and popularity of social media platforms, including their relevance in the political and electoral context. Other elements like language, ethnicity, and gender, geographic, and religious divide, should also be considered.</p> <p>The SMA often has to rely on second-hand information, hence it is key to use only reliable and reputable sources.<sup>14</sup></p>	<ul style="list-style-type: none"> <li>● Internet penetration rate, social media access rate;</li> <li>● Digital and media literacy rate;</li> <li>● Mobile phone coverage and access to smartphones;</li> <li>● Data on users per social media platform and lists of opinion leaders/influencers per each platform, languages used on platforms.</li> <li>● Reports on previous information manipulation operations;</li> <li>● Measures taken by state institutions to enhance digital/media literacy and to reduce digital divide (could be a basis for a recommendation).</li> <li>● Fact-checking and digital literacy initiatives led by CSOs, media, or other groups.</li> </ul>
<b>Online presence of political parties and candidates</b>	<p>The EU EOM should map the use of social media platforms by each political actor. The mission should enquire if electoral contestants face any discriminating practices while using social media platforms and establish how the EMB, relevant state institutions and social media platforms address such concerns. Women and other disadvantaged groups might be disproportionately impacted by intimidating and threatening content.</p>	<ul style="list-style-type: none"> <li>● The extent to which parties and candidates use social media platforms, instant messaging and other digital tools;<sup>15</sup></li> <li>● Number of followers, date of creation of the page/account, activity of the page/account</li> <li>● Media and digital literacy of electoral contestants.</li> </ul>

<sup>14</sup> Criteria for reliable sources: the organisation has a credible track record in collecting statistical data (where possible the EU EOM should use official statistical information, provided by the State Statistical Bureau); the data provided by an organisation has been cited by other international organisations, like various UN agencies or academia.

<sup>15</sup> It includes, but is not limited to, the number of followers per social media platform, frequency of posting, engagement with the public (whether the electoral contestant responds to comments), the type of posts (statements, videos, memes, livestreaming, etc.), is the account sharing/re-tweeting or relying only on its own content.



Subject	Description	Legislation, data and processes to be reviewed and observed
<p><b>Online presence of state actors, influencers, activists, religious leaders, etc.</b></p>	<p>The use of social media and other online platforms by EMBs will be analysed separately within the area “General regulatory framework”. Hence this subject covers the use of official social media accounts and websites by state institutions and executive-level public officials.</p> <p>Official accounts of institutional actors can serve as valuable tools for disseminating electoral information in the public interest. However, they can also be misused for campaigning in favour of a specific political party or candidate, indicating potential misuse of administrative resources. The SMA would have to analyse and assess both aspects.</p>	<ul style="list-style-type: none"> <li>● The extent to which other actors, including political and official ones, use social media platforms and are influential. It includes, among others, the official account of the President, Prime minister and the Speaker of the Parliament;</li> <li>● The online presence of other actors (activists, journalists, religious leaders, etc.) that have large numbers of followers and shape the online debate.</li> </ul>
<p><b>Most relevant pages, accounts, and hashtags</b></p>	<p>Mapping the most relevant pages<sup>16</sup>, accounts, and hashtags on various platforms in the host country gives the SMA an understanding of the influential pages/accounts, the circulation of information between platforms, the rhythm of hashtags appearing and disappearing, their sources, etc.</p> <p>Some of those pages/accounts may not be political in nature but could change name, owner, or editorial line during the course of the mission; they could unexpectedly share political information, manipulative content, or share infotainment, mixing political and entertaining content.</p>	<ul style="list-style-type: none"> <li>● Identify pages and accounts with the highest number of followers on various platforms (Facebook, X/Twitter, YouTube, Instagram, TikTok, etc.). This may include media, artists, fashion influencers, politicians, etc.</li> <li>● Identify relevant/trending hashtags and accounts sharing them.</li> </ul>
<p><b>Digital literacy and fact-checking initiatives</b></p>	<p>The EU EOM should assess the media and digital literacy rates in the host country that allow for a more resilient and critically thinking public, as well as the fact-checking initiatives that help provide verified news to the electorate. This includes initiatives from the government, which has a positive obligation to foster media and digital literacy, as well as CSOs, international organisations, the media, etc.</p>	<ul style="list-style-type: none"> <li>● Identification of fact checking and digital literacy initiatives led by the government.</li> <li>● Identification of fact-checking and digital literacy initiatives led by CSOs, media, international organisations, or other groups.</li> </ul>

**Information manipulation**

This area includes an analysis and where possible, an assessment of digital practices that have the potential to or have undermined the integrity and fairness of the election. This assessment is primarily

<sup>16</sup> Relevance is understood as the metric that, on each platform, is a better proxy for estimated influence on the electoral debate, e.g. “interactions” or “shares” on Facebook; “reach” or “impressions” on X/Twitter; or “relevance” or “views” on YouTube.



based on social media monitoring results, therefore limited to the duration of the deployment of the EU EOM.

Information manipulation describes patterns of behaviour that aim at manipulating the information environment and have the potential to disrupt decision-making processes and the free formation of opinion during electoral processes. Such activity is conducted in an intentional manner, coordinated or alone, by domestic or foreign actors. It is defined by its deceptive or manipulative character, rather than its false or misleading content.

Information manipulation relies on manipulated content (fabricated or misleading content, false context, false connection, propaganda, hateful content, etc.), that is distributed through various techniques (bots, fake accounts, microtargeting, trolling, etc.) by state or non-state actors. The monitoring of social media allows the mission to identify manipulative narratives and messages, presented below, and analyse their circulation, reach and the techniques to share those messages that distort the online space.

Information manipulation is multifaceted and often created in a coordinated manner across different online platforms. It could be observed not only during the campaign, but also on election day and prior to/during the announcement of results.

The mission should distinguish between information manipulation that is created and shared within a small like-minded group most likely having a limited impact on the electoral process, and that which is pushed across platforms as sponsored content or is created by a social media influencer with a broad fan base, hence having the potential to harm the electoral process. EU EOMs do not have the capacity to directly monitor *foreign information manipulation and interference (FIMI) campaigns*. However, they often collaborate with other EU initiatives and EU Delegations, exchanging information and analysis.

Subject	Description	Legislation, data and processes to be reviewed and observed
<p><b>Discreditation of the process, or of contestants</b></p>	<p>The EU EOM monitors lists of accounts/pages, hashtags, and/or keywords that tend to discredit and delegitimise the electoral process or contestants of the elections. This includes false claims on the process, the procedures, or the electoral administration, including discreditation of the results, smear campaigns, misleading or fabricated information targeting both the electoral process and the candidates as well as specific groups (women, minorities, etc.).</p>	<ul style="list-style-type: none"> <li>● Lists of accounts/pages, hashtags, and/or keywords to be monitored.</li> <li>● How those campaigns are circulated (tactics used);</li> <li>● How EMB and relevant authorities respond to information manipulation and whether platforms are enforcing their own community standards for fake accounts, disinformation, etc.</li> <li>● Whether messages from disinformation campaigns are cited during the rallies and in legacy media and the impact on overall campaign narratives;</li> <li>● Any “pre-bunking” by electoral contestants, EMB, or online platforms.</li> </ul>



Subject	Description	Legislation, data and processes to be reviewed and observed
<p><b>Polarising and divisive narratives</b></p>	<p>The EU EOM should monitor lists of accounts/pages, hashtags, and/or political and electoral keywords that polarise the online space. Highly polarised debates tend to favour extreme messages and to silence moderate voices, limiting the political participation of part of the population, and limiting the free flow of information.</p> <p>In addition, they can be used to influence public formation of opinion and public attitudes towards elections or contestants, and can impact the integrity of the elections.</p> <p>Such narratives include propaganda, fabricated or manipulated content, including pictures and videos, false claims, false quotes, etc.</p>	<ul style="list-style-type: none"> <li>● The SMA and the social media monitoring unit (SMMU) should identify lists of accounts/pages, hashtags, and/or keywords to be monitored to identify widespread divisive narratives. An indication is often overperforming/trending posts;</li> <li>● The SMA should identify how those narratives are circulated (tactics used), and analyse it (fake accounts, bots, search engine manipulation, microtargeting, etc.) to assess its impact;</li> <li>● How traditional media, CSOs, fact-checking initiatives, and contestants respond to those narratives;</li> <li>● The SMA should try to identify if vulnerable communities are disproportionately affected by those narratives.</li> </ul>
<p><b>Derogatory speech and hateful content</b></p>	<p>The EU EOM should establish who is targeted by such content, and analyse how such content is circulated, by whom, how organised are those campaigns, and what kind of reaction they trigger.</p> <p>The mission should establish clear guidelines for the monitors to identify and categorise such content.</p> <p>Derogatory speech or hateful content circulated within a small, closed group also has a potential to harm and to trigger violence offline.</p> <p>Special attention should be paid to women (contestants, journalists, officials) and to certain religious groups or minorities as they may be disproportionally targeted by such content.</p>	<ul style="list-style-type: none"> <li>● Evidence of such content may include comments or responses to posts and tweets, in addition to the original messages;</li> <li>● Whether relevant authorities, including the EMB, are taking timely and proportionate measures against persons who are promoting such content; Special attention to be paid to actions and inaction during the last days of campaign as parties and candidates may not have enough time to respond to false allegations;</li> <li>● State and/or civic initiatives to monitor and counter such content;</li> <li>● The actions taken by platforms to implement their own community standards, including the responsiveness of platforms to credible requests by state authorities, official fact-checking organisations, or individuals to take</li> </ul>



Subject	Description	Legislation, data and processes to be reviewed and observed
		actions against accounts propagating hateful content.
<b>Political suppression, intimidation and threats</b>	<p>The EU EOM should also identify any threats, intimidation, and incitement to violence. If identified, such content should be analysed to evaluate whether it is part of a systematic attempt to suppress certain opinions or political dissent, or whether it aims at (or has the effect of) intimidating certain groups of voters, candidates, and party supporters.</p> <p>Special attention should be paid to specific groups as they may be disproportionately targeted by such content.</p> <p>Political suppression may also target specific groups of voters by distributing false information on candidates, date and time of voting, documents requested, etc.</p>	<ul style="list-style-type: none"> <li>● Any evidence on intimidation, threats and political suppression;</li> <li>● Assess its impact on the targeted groups/individuals, and the whole process;</li> <li>● How EMB, the judiciary, contestants respond to such issues;</li> <li>● The actions taken by platforms and their responsiveness in case of reporting.</li> </ul>

**Online election campaigning and paid political advertising**

Social media offer contestants new options to develop direct interaction with the electorate and to bypass the legacy media and traditional campaign methods, when the political environment or reduced financial means do not allow for it. The EU EOM examines the information shared online by electoral contestants. This includes mainly, but not exclusively, information on the candidates, programmes, campaign activities, possibly voter education material, as well as advertising and sponsored content shared by candidates, parties, as well as third parties. The mission assesses the transparency of the costs and origin of advertising and, if possible, any third-party role in paid campaigns and techniques applied to reach certain segments of society. The monitoring of the campaign may allow the SMA to identify information manipulation narratives.

While the analysis of the campaign online depends on the activity of the contestants monitored and the scope of the monitoring, the depth of analysis related to political advertising primarily depends on the level of transparency that the tech companies have introduced for host countries. Due to time and resource constraints, manual monitoring of online advertising is not advised in countries where tools like Ad Library (Meta) are not fully rolled out.

The EU EOM also observes political and electoral-related content shared by other pages including EMBs, official pages and accounts, as well as other influential pages and accounts (influencers, media, CSOs, religious leaders, etc.). This helps to inform the EU EOM on the possible existence of shadow campaigns or campaign by third-parties, on the electoral information shared by various stakeholders, including voter education material and it allows the mission to identify the top election-related topics, and possible manipulative narratives.



## EUROPEAN UNION ELECTION OBSERVATION

Subject	Description	Legislation, data and processes to be reviewed and observed
<p><b>Campaign online by electoral contestants</b></p>	<p>The EU EOM monitors a selection of contestants’ social media accounts and establishes how electoral contestants are using social media: to promote policies and to mobilise the electorate or as a vehicle for dissemination of deceptive, polarising narratives and other forms of harmful content.</p> <p>The EU EOM analyses their online strategies, the topics covered, the tone of the campaign, and identifies possible deceptive, harmful, or illegal material. The analyst should distinguish between legitimate (fact-based) negative campaigning and harmful content.</p> <p>The EOM conducts both a qualitative and quantitative analysis of the pages and accounts selected to understand the level of activity as well as the engagement generated by the contestants’ posts.</p>	<ul style="list-style-type: none"> <li>• The extent to which electoral contestants campaign on social media (quantitative analysis);</li> <li>• The topics and tone of the online campaign;</li> <li>• Whether contestants tend to create or circulate policy-based messages or other type of contents, including, harmful, content;</li> <li>• The circulation and amplification of harmful content beyond contestants’ social media accounts;</li> <li>• Code of conduct on the campaign online and party strategies on online campaign.</li> </ul>
<p><b>Sponsored content and political advertising</b></p>	<p>Similar to those in legacy media, political online advertisements must be clearly labelled as “paid-for”. If tech companies and/or relevant supervisory bodies provide enough information, the EU EOM can gather data on the content and offer an estimated number, frequency and costs of such ads.</p> <p>The SMA should focus her/his analysis on the level of transparency in political advertising and accessibility and timeliness of such data.</p> <p>Political ads may also be shared by non contestants, in favour or against contestants. Legal frameworks rarely encompass provisions on non-contestants spending online. Advertising and sponsored content placed by third-parties is one of the key challenges in assessing online election campaigns, as there is little to no transparency about who paid for it and who is the recipient. Such advertising, while not being a part of the official campaign, is directly linked to it and enhances the general campaign message. It also can fuel information disorder and/or undermine the integrity of the electoral process.</p> <p>Overall, third-party campaigns are difficult to assess, yet the SMA should try to identify and quantify the presence of such content, establish who is benefiting from it and to what extent tech companies are making efforts to limit undue influence of malevolent actors and are promoting transparency.</p> <p>State institutions and executive-level public officials might sponsor content that reinforce the campaign messages of a certain electoral contestant and by doing so they would help this political actor to</p>	<ul style="list-style-type: none"> <li>• Measures that tech companies and relevant supervisory bodies have introduced to obtain accurate data on expenditure per party/contestants on platforms;</li> <li>• Meta Ad Library – level of transparency and quality of data. Processes introduced by tech companies to ensure, that political advertising is made by people registered in the host country (in some countries, Meta may introduce restrictions to the data shared, including on the identity of advertisers, for security reasons);</li> </ul> <p>Those two elements are necessary to allow for meaningful monitoring of Facebook ads.</p> <ul style="list-style-type: none"> <li>• Whether such advertising has the spill-over effect on the offline campaign.</li> <li>• Any state-paid advertisement on platforms and who benefits from such practice;</li> <li>• Measures taken by relevant state authorities to counter misuse of administrative resources, if provided for by the law;</li> <li>• Any positive examples of state-sponsored online advertisement aiming at voter education.</li> </ul>





## EUROPEAN UNION ELECTION OBSERVATION

Subject	Description	Legislation, data and processes to be reviewed and observed
	<p>circumvent campaign finance rules. The SMA should establish if such practices are employed; if it amplifies incumbency advantages or is a form of misuse of administrative resources.</p> <p>Public accounts may also be used to sponsor voter information and civic education messages, having a positive effect on the electoral process.</p>	
<p><b>Election-related content shared by EMB, official pages and accounts</b></p>	<p>The EU EOM should monitor the EMB official page(s) and account(s), to identify voter education material, pre-bunking or debunking initiatives, information on the procedures, on campaign finance, the results, and analyse how/if this official information is reshared by other actors of the process (media, contestants).</p> <p>EMBs may also conduct social media monitoring efforts and publish results online that the mission should analyse.</p> <p>Official pages and accounts of institutions or elected officials could be an important tool to disseminate electoral information of public interest, but they could also be misused to campaign for a certain political party or a candidate signalling about a misuse of administrative resources.</p>	<ul style="list-style-type: none"> <li>● Content analysis of the identified accounts;</li> <li>● Data on their reach, audiences and activities;</li> <li>● Circulation and amplification of information, including through sponsored content;</li> <li>● Level of cooperation between EMB, platforms, and citizen observers;</li> <li>● Public outreach policy of the EMB;</li> <li>● Safeguards and measures taken by the authorities to counter misuse of administrative resources, if provided by law;</li> <li>● Any reports (social media monitoring, campaign finance) shared by the EMB.</li> </ul>
<p><b>Election-related content shared by influencers, media, CSOs, activists, others</b></p>	<p>Multiple pages and accounts play a role in the electoral process. From satirical accounts to civic initiatives and rights advocacy groups, and from journalists accounts to religious leaders' pages.</p> <p>The EU EOM should review such initiatives and assess whether their efforts have a positive effect on the electoral process, or, on the contrary, if such initiatives in practice create confusion among voters and aim at damaging the integrity of elections. Also any impediments to civic, nonpartisan efforts should be identified.</p>	<ul style="list-style-type: none"> <li>● Identification of organisations and individuals engaged in election-related activities online;</li> <li>● Data on their reach, audiences and activities (both online and offline);</li> <li>● Level of cooperation between digital activists, EMB, platforms, and citizen observers;</li> <li>● Any legal and practical impediments on their activities, if any;</li> <li>● Any impediments on their online activities from the platforms' side;</li> <li>● Content analysis of the information shared by the identified accounts.</li> </ul>

### Alert, early warning regarding tensions and violence

The observation of online content may help to identify potential outbreaks of political, social and/or ethnic tensions, possible cases of election fraud or other possible threats to a credible and peaceful election. Such information, if spotted by the social media monitoring, should be forwarded to EU EOM leadership (Chief Observer and Deputy Chief Observer) and the Security expert.



The mission should also strive to establish a professional working relationship with national and international organisations and/or civil society groups who strive to systematically identify instances of online information that may signal tensions or the possibility of offline violence.

#### Information about the EU EOM visibility online

Social media monitoring can inform the EU EOM on how online platforms cover the mission and what comments particular users express towards the mission. The social media monitoring findings can indicate the way the mission is perceived by electoral stakeholders (civil society activists, political parties and candidates, EMB, etc.). The monitoring can also spot if tensions towards the EU EOM are building up online or the mission itself becomes a target of a disinformation campaign. Such information should be reported to the EU EOM Press Officer.

### 3. Drafting recommendations

Each EU EOM drafts a set of recommendations as part of its final report for how the host country can improve its election process in line with regional and international standards. For the EU EOM recommendations to contribute to improved electoral processes, they should **be clear, concise and realistic** given the context and based on **regional and international obligations, commitments, principles, and good practices for democratic elections**. This guidance also pertains to recommendations related to social media and digital rights.

EU EOMs regularly make recommendations related to certain aspects of social media and digital rights. Those include:

- Freedom of expression online, equality and freedom from discrimination;
- Access to the internet and right to access to information;
- Transparency of advertising, including campaign finance regulations for online campaign ads; this may include transparency policies put in place by social media companies, such as ad libraries;
- Respect for privacy and data protection;
- Right to effective remedy.

The EU EOM may also consider proposing **recommendations related to issues like disinformation and derogatory speech**. In such a case, the EU EOM should bear in mind that standards for those areas are still under elaboration. Therefore, the EU EOM should find a fair balance between protection of freedom of expression and the need to preserve electoral integrity by carefully weighing both risks and opportunities related to the implementation of such recommendations.

Recommendations addressed to several stakeholders could have a positive effect on the overall integrity of the process **by empowering national authorities** (EMB, data protection and campaign finance authorities, media regulatory bodies) **to engage with online platforms** with an aim to foster their social media action strategies related to voter information and civic education campaigns, dissemination of information of public interest, transparency in political advertising and in countering information manipulation. Measures that can have a positive effect on the election include:

- Self or co-regulation for social platforms;
- Codes of conduct for candidates and parties / media and journalists;



- Civic education on digital and media literacy and fact-checking initiatives;
- Enhanced cooperation among state authorities and online platforms;
- Support for quality journalism, such as training in investigative and data-driven journalism, training for senior editorial staff on election-related programming, etc.

### **Good practices**

As the EU EOM Final report and recommendations can inform possible areas for EU-supported technical advice and assistance, the mission should clearly identify and encourage empowerment of existing positive initiatives and call for greater cooperation among various stakeholders.

Such initiatives include:

- Fact-checking projects that entail cooperation between the civil society, legacy media, EMB and other government agencies
- Citizen observer groups/civil society organisations with an expertise in tracking election-related violent incidents and presence of hateful content and derogatory speech online
- Civic and media initiatives examining data on party and campaign finance
- Cooperation between civil society, academia and state institutions to reduce digital divide and enhance the overall media and digital literacy
- Synergy between online and offline civic education and voter information campaigns

### **Red lines**

At the same time, there are certain types of recommendations that could be counter-productive and therefore should be avoided. Such red lines the mission should be mindful of include:

- A recommendation that would fall outside the mission's mandate and whose objective cannot be directly linked with the electoral process
- A recommendation that is not discussed or is not supported / acknowledged as desirable by at least some national stakeholders
- A recommendation that is either overly specific or too vague, posing a risk of misinterpretation