Module 3: Fairness, pluralism and equitable treatment

Training material to be shared with trainers only

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This module helps trainers work through practical decisions about fair election coverage and electoral communication across broadcasting, print, online editorial media and social platforms. It combines a common framework with activities that can be adapted to the participants' professional responsibilities.

Use the separate participant exercise document for distribution. Keep this guidance, including suggested conclusions and assessment criteria, with trainers until the activities have finished. PowerPoint presentations can be developed from this framework; the activities do not depend on slides.

Trainer overview

Module objective

Enable participants to design or assess election coverage that gives contestants meaningful opportunities to communicate and voters useful, diverse information, while respecting editorial independence. Participants examine when equal allocation is appropriate, when differentiation is defensible, and how fairness can be weakened by the presentation and distribution of content even where formal access exists.

The module treats broadcast and online communication together, while distinguishing the decisions made by editors, political actors and platforms. It recognises the increasing importance of online campaigning without assuming that television, radio or print have ceased to matter, or that all voters use the same channels.

Standards anchor

Recommendation CM/Rec(2022)12 provides the main contemporary framework and complements CM/Rec(2007)15. Read these alongside CM/Rec(2018)1 on media pluralism and ownership transparency, Article 10 ECHR, and the Venice Commission's equality-of-opportunity guidance. Article 3 of Protocol No. 1 protects elections to the legislature; its application should not be assumed identical for every type of election. Distinguish binding law, authoritative recommendations and professional good practice when applying the materials nationally. [1–5]

Learning outcomes

- Explain internal pluralism as diversity within an individual media outlet or service, and external pluralism as diversity across independent outlets, owners and sources in the wider media environment.
- Apply both concepts to broadcast and online editorial output, while distinguishing the range of information available online from the information users actually encounter.
- Distinguish equality, equity, impartiality and balance, and justify different arrangements for designated access, news, interviews, debates and paid content.
- Assess access criteria and alternatives for smaller, new and independent contestants without treating existing visibility as the only measure of relevance.
- Identify how official activity, framing, prominence, short clips, paid distribution and platform selection can affect opportunities and voter information.
- Produce a reasoned professional response that identifies the relevant actor, standard, evidence, safeguards and review route.

Session techniques and methods

An agree–disagree activity; concept sorting; format matching; paired content comparison; small-group planning and peer review; optional comparison of observation findings; individual reflection. Each technique has an accessible seated or online equivalent.

Duration and selection

The standard route is 90 minutes, including reporting back and debriefs. A condensed route takes 75 minutes; the extended route takes 120 minutes. These are delivery options, not a requirement to teach every paragraph. Preparation, translation and breaks are additional. The route table on page 3 specifies exactly what to shorten or add.

Trainer preparation and common messages

Before the session

- Select the route, professional roles and two local questions. Ask participants beforehand which access or coverage decisions they find difficult.
- Check the current national rules for each medium and format, including public-service online output, paid content, official accounts and complaints. Where relevant, identify the EU platform and political-advertising layer for discussion in Module 6; do not assume EU law applies throughout the Council of Europe.
- Map influential national and local broadcasters, online outlets, platforms and messaging services. Include language, disability access, connectivity and differences between audience groups.
- Prepare participant Sheets 1–3. Add Sheet 4 for the extended route. Keep debriefs separate; supply relevant national provisions for any simulated legal decision.
- Use groups of three to five. Ask each group to choose a reporter and timekeeper; invite a brief individual reflection before group discussion. Allow dissenting conclusions and avoid treating seniority as authority.

Route table

Session	75 min	90 min	120 min
1 Agree–disagree opening	10	10	10
2 Concepts and pluralism	15	15	15
3 Media, formats and access	15	20	20
4 Incumbency and presentation	10	15	20
5 Coverage plan and debrief	20	25	30
6 Election comparison	0	0	20
7 Assessment and next step	5	5	5

For 75 minutes, supply the access checklist as advance reading, discuss one item from Sheet 3 and hear only two contrasting group reports. For 90 minutes, use both items and a short peer review. For 120 minutes, add the comparison clinic and a fuller defence of the coverage plan. Do not cut the debrief to recover time.

Core messages that should remain constant

- Fairness serves informed voter choice and meaningful opportunities; it does not promise identical prominence in every item or equal electoral success.

- Internal and external pluralism are complementary. The existence of competing outlets does not discharge the public service media's own responsibilities.
- Public service media, private editorial outlets and platforms perform different functions. Broadcast allocation rules should not automatically become quotas for personalised feeds.
- Online fairness concerns meaningful access, discoverability, transparent paid promotion and consistent treatment, as well as the freedom to publish. More accounts or posts do not necessarily mean more independent voices.
- Unequal views, engagement or advertising expenditure are reasons to ask questions, not proof of bias, manipulation or illegality. Check causes, rules and evidence.
- Tone, prominence, context, language and accessibility matter offline and online. A token interview or an obscure web link may not provide a meaningful alternative.

Scope

Module 3 applies fairness and pluralism. Use Module 2's legal framework and platform cases as prior learning. Reserve monitoring methods for Module 4, manipulation for Module 5, detailed DSA/VLOP enforcement and advertising duties for Module 6, and inclusion for Module 7. Here, discuss their implications for fair opportunities and voter information.

Opening discussion

SESSION METHOD Position yourself on an agree–disagree scale | TIME 10 minutes

Guidance for trainers

Use Sheet 1. Read the proposition, allow one minute for individual choice, and invite participants to select strongly agree, agree, undecided, disagree or strongly disagree. They may stand by signs, hold cards or answer an anonymous poll. Physical movement is optional.

Invite two contrasting explanations, starting with the smaller group. Ask which medium and format each speaker has in mind. Change the example from a public broadcaster's debate to its social-media clips and then to a platform feed. Allow participants to change their position and explain why. Record questions for the final debrief; do not announce a single numerical rule.

Trainer emphasis

An editorial allocation, a paid advertisement and a personalised recommendation are different decisions. Identify who controls each before deciding what fair treatment requires. Preserve the difference between a contestant's opportunity to communicate and the audience's voluntary response.

Understanding fairness and pluralism

SESSION METHOD Concept sorting and short explanation | TIME 15 minutes

Guidance for trainers

Ask pairs to classify the three examples on Sheet 1 before showing the definitions. Spend five minutes comparing answers, five minutes clarifying the concepts, and five minutes applying them to online distribution. Invite one national example of each form of pluralism.

Concept	Working meaning
Equality	The same allocation or conditions for similarly situated contestants, for example an equal designated slot.

Concept	Working meaning
Equity	Fair differentiation using relevant, reasonable and consistently applied criteria; it is not a licence to favour established contestants.
Impartiality	No improper preference in selection or treatment. Rigorous, evidence-based criticism is compatible with impartiality.
Balance	Appropriate attention to relevant perspectives over a defined body of output and period. It is not automatic 50–50 treatment of every claim.
Internal pluralism	Diversity of political and social voices within one outlet or service, including its relevant online editorial output.
External pluralism	Diversity of genuinely independent outlets, ownership, editorial positions and sources across the media environment.

Key explanation

Several differently branded websites under common editorial control do not necessarily add independent perspectives. Conversely, an outlet can provide diverse coverage even in a concentrated market. Neither assessment can be made from the number of brands alone. [3]

On platforms, distinguish available diversity from exposure diversity: many sources may be available, while an individual encounters a narrower selection through subscriptions, language, sharing and recommendations. This is an additional question about distribution, not a redefinition of internal pluralism as equal time in every feed. Do not assume that every user is trapped in a closed information bubble.

Applying fairness across media and formats

SESSION METHOD Format matching and access criteria clinic | TIME 15 or 20 minutes

Guidance for trainers

Ask groups to match equal slots, proportional allocation, editorial selection, rotation and minimum guaranteed access to the contexts below. Allow five minutes for matching, five for comparing two disputed choices and five for the access test on page 6. In the 20-minute route, add the North Macedonia illustration and a short discussion of its online implications.

Explain that the table identifies assessment questions, not a uniform legal code. National requirements and the distinction between mandatory obligations and recommended practice must be stated. [1, 2, 5]

Actor or format	Fairness focus
Public service media across their services	Independent, pluralistic election journalism, useful voter information and meaningful opportunities. Review broadcast output alongside websites, streaming, apps and editorial social accounts.
Private television and radio	Editorial independence with the election, licensing and impartiality requirements applicable nationally. Assess reach and influence without treating them as an automatic source of new legal powers.

Actor or format	Fairness focus
Private print and online editorial outlets	Freedom of editorial position, accuracy and professional responsibility; distinguish opinion from news and paid content. Do not automatically import broadcaster obligations.
Designated free access	Apply the lawful allocation formula; check scheduling, production conditions, accessibility and how non-participation is handled. An equal slot need not mean equal audience size.
News, interviews and debates	Defensible newsworthiness and selection criteria, scrutiny, fair moderation and meaningful alternatives. Avoid a mechanical quota that crowds out useful reporting.
Online editorial presentation	Examine headlines, thumbnails, clips, home-page placement, notifications and promotion controlled by the outlet. A fair full programme can be undermined by misleading extracts.
Paid promotion and sponsored content	Identify the sponsor and conditions of access. Check applicable pricing, funding, disclosure and targeting rules. Distinguish genuine editorial selection from purchased visibility.
Social platforms and video-sharing services	Consider how ranking, recommendation, moderation and advertising affect access and discoverability. Examine transparency and consistent application of rules, not a duty to deliver equal views.
Political and institutional accounts	Campaign accounts may advocate for a contestant. Public institutional accounts raise different questions about impartial official communication, public resources and the use of publicly held data.

A practical distinction

An outlet decides which clip it posts and how it captions or promotes it. A platform may then rank or recommend that clip. Users decide whether to watch or share it. A fairness assessment should separate these contributions rather than attributing the entire outcome to one actor.

Access criteria and meaningful alternatives

Background for trainers

Access need not mean participation in every programme. The question is whether the overall arrangement gives contestants a meaningful opportunity and enables voters to compare relevant choices. Selection criteria can include registration, constituency relevance, reliable evidence of support and the purpose of the format. Previous representation or polling may be relevant, but exclusive reliance on them can entrench established parties.

Online follower totals are especially weak substitutes for electoral support: they may include non-voters, overseas users, repeat or inauthentic accounts and audiences built for unrelated reasons. Lack of an established digital following should not by itself exclude a new contestant from public-service coverage.

Access test

- Purpose: What is the programme or service trying to help voters understand?
- Rule: Is the criterion clear, relevant and known sufficiently in advance?
- Evidence: Are polls or other indicators current and reliable? Are uncertainty and differences between constituencies considered?
- Consistency: Would the same rule be acceptable if applied to a different political party? Are departures documented?
- Alternative: Can excluded contestants reach a relevant audience in time, with useful scheduling, promotion, accessibility and a comparable opportunity to explain their proposals?
- Review: Can a mistake be challenged and corrected before the opportunity loses its value?

An online-only alternative is not automatically adequate. Consider access to devices and connectivity, language, discoverability and the extent to which it reaches the intended audience. Equally, a well-promoted accessible online interview may be useful; it should not be dismissed simply because it is not broadcast.

Recent illustration from North Macedonia

For the 2025 local elections, ODIHR found that the allocation of state-funded political advertising favoured major parties and disadvantaged smaller contestants, particularly in runoffs. It also identified limits on public-broadcaster editorial independence arising from prescribed news allocations, while finding monitored broadcast election coverage overall balanced and generally neutral. [6, sections X.B–C]

Discussion and debrief

Ask: Can broadly balanced reporting coexist with unfair access arrangements? What should be assessed separately? Distinguish the design of public funding, the rules for editorial coverage and the quality of actual output. A favourable finding in one area does not settle the others.

For the digital comparison, ask whether moving a state-funded allocation scheme online would change its fairness. The distribution channel alone does not make exclusionary eligibility criteria fair. This is a hypothetical application of the example, not a claim that the report assessed an identical online scheme.

National application

Ask participants to identify one existing criterion they would retain and one they would test further. Lawyers and regulators should state the legal basis; editors should explain the public-interest justification; observers should identify what evidence would establish the criterion's effect. Do not invite a regulator to replace the editor's judgment merely because a different format might be preferable.

Incumbency and qualitative fairness

SESSION METHOD Paired comparison using Sheet 3 | TIME 10, 15 or 20 minutes

Guidance for trainers

Use Item A for the 10-minute route: two minutes to read, four to discuss, four to debrief. For 15 minutes, add Item B and compare conclusions. For 20 minutes, ask participants to rewrite the clip treatment or institutional-post response and defend it. Separate established facts, reasonable concerns and information still needed.

Official activity across channels

An office-holder remains responsible for governing and may legitimately be newsworthy. Ask whether the event is necessary or routine, why it happens now, how it is presented and who funds its communication. A public emergency, a routine ceremonial opening and an event staged to promote a candidate require different judgments.

Examine the same issues on institutional websites and social accounts. Public staff, footage, promotional budgets, mailing lists and established institutional audiences can create advantages beyond formal campaign airtime. Do not assume that every official appearance is campaigning or that officials lose their personal political rights.

Recent illustration from Serbia

For the 2 June 2024 local elections, ODIHR recorded partisan posts on some official social-network accounts, including those of mayors and municipalities. It separately reported about one million interactions for eight ruling-party actors' Facebook and X accounts, compared with 228,000 for twelve prominent opposition actors between 1 May and election day. [7, section VIII, p. 16]

These are different kinds of evidence. Institutional-account use raises a public-resource question; unequal interactions alone do not demonstrate unlawful advantage, unique audience reach, persuasion or electoral effect.

For a recent institutional-account comparison, use Albania's 2025 case on Sheet 4. Its monitoring referrals were potential violations, not final findings. Ask participants what evidence and procedure should follow a referral. [10]

Qualitative fairness in practice

- Voice and scrutiny: Can contestants explain their position and answer significant criticism? Are questions comparably rigorous rather than necessarily identical?
- Framing and accuracy: Do headlines, images and edits preserve the substance? Correct falsehoods without manufacturing equal credibility for unsupported claims.
- Prominence: Compare scheduling and placement offline, and thumbnails, notifications, captions and editorial promotion online.
- Distribution: Separate what the outlet controls from paid advertising, third-party sharing, platform recommendations and audience choice.
- Social and issue diversity: Include relevant policy choices and affected communities, rather than treating the number of party leaders as the whole measure of pluralism.

In North Macedonia's 2025 runoff campaign, ODIHR recorded anonymous accounts and some journalists circulating sensitive personal data of Levica's Skopje candidate. [6, section VIII.B, p. 19] Ask how an editor could report a controversy without amplifying private data. Discuss participation and fair treatment here; take detailed protection measures to Module 7.

Debrief for Sheet 3

Item A: the differing edits and notifications justify examining the outlet's decisions. Equal interview length does not settle fairness. Ask for complete footage, editorial reasons and the wider pattern; do not infer intention from one extract.

Item B: establish the account's status, staff and funding, the event's significance and applicable rules. Preserve genuine public information and consider correction, separation of party messaging or a referral within the competent body's mandate. Neither automatic deletion of government news nor uncritical repetition is a satisfactory default.

Designing a fair coverage plan

SESSION METHOD Professional simulation and peer review | TIME 20, 25 or 30 minutes

Guidance for trainers

Distribute Sheet 2, not the following trainer debrief. Use one scenario for all audiences and select the relevant role from page 11. Groups should produce a short usable decision or plan, not a general statement that coverage should be fair.

For 20 minutes, allow two minutes for instructions, eight for planning, four for two contrasting reports and six for debrief. For 25 minutes, add five minutes of peer review. For 30 minutes, add a five-minute challenge round in which groups defend or amend their proposals. These allocations include reporting back.

Visit each group to clarify the task without supplying the answer. Ask quieter participants to contribute a specific concern. Require the reporter to mention any disagreement within the group. In a mixed-audience session, an editor, regulator and observer can respond to the same plan from their own mandates; no group should claim another institution's powers.

Scenario summary

Twelve parties contest a four-week parliamentary election. A public service broadcaster provides free airtime, news and debates, with online interviews and short social clips. A private broadcaster and an independent online outlet also cover the campaign. Polls differ on smaller parties. Some parties are much more active online than others. The prime minister is a contestant, and an institutional account promotes public projects alongside campaign-like messages.

The full hypothetical facts and tasks are on Sheet 2. No country's law is implied by the scenario. For legal groups, attach an identified national rule and ask them to distinguish what the rule requires from possible reform.

Required output

Ask every group to identify its professional role and submit:

- a defensible approach to debate and interview selection, with meaningful alternatives;
- a treatment of official activity and institutional social accounts;
- safeguards for fair editorial clips, prominence and accessibility;
- a distinction between editorial decisions, paid promotion and platform distribution;
- a timely review or complaints route within the relevant mandate.

Peer review

Give the plan to another group and ask them to find one strength and one vulnerability. Could the criteria exclude a new party regardless of its relevance? Is online access merely nominal? Does a promised remedy assume a power the institution lacks? What evidence would change the decision?

Ask the first group to make one revision after hearing the challenge. This turns feedback into a practical decision and tests whether participants can apply the principles rather than repeat their names.

National adaptation

Replace the number of contestants, platforms, languages and access requirements where necessary, but retain at least one broadcast decision, one online editorial decision and one distribution question. Avoid converting the activity into a detailed platform-enforcement exercise; that belongs in Module 6.

Coverage plan debrief and assessment

What a defensible response should contain

Equal designated slots may be appropriate where required, but they do not settle the fairness of news, debates or digital promotion. The response should specify the format, period and audience being assessed, and distinguish a legal requirement from an editorial commitment.

Selection should use explainable criteria and reliable evidence. Polls need context, including margins of error, timing and constituency relevance. Followers and views should not be treated as interchangeable with electoral support. Smaller contestants need meaningful alternatives, not simply unused space that voters are unlikely to find.

The public service provider should examine its relevant output across channels. If it gives all contestants comparable interviews but systematically selects flattering clips for some and damaging extracts for others, broadcast balance does not resolve the online editorial issue. Private editorial outlets retain freedom to take positions, subject to the law and standards applicable to them.

An editor cannot guarantee equal platform reach. The plan can govern the outlet's own choice of extracts, captions, posting and promotion, and can identify questions about platform treatment. A popular post is not inherently unfair; unexplained disparities should prompt investigation, not automatic equalisation.

Official communication should remain useful to the public. Record the capacity in which an office-holder appears, distinguish institutional and party resources, and assess context and cumulative exposure. Responses should address the demonstrated problem without silencing legitimate government information.

Assessment rubric

Use the following to give brief feedback, not to reward agreement with the trainer. Award one point for each criterion demonstrated, up to six. There may be several defensible plans.

Criterion	Evidence in the group's response
Clear scope	Identifies the actor, format, period and relevant national rule or professional standard.
Pluralism	Distinguishes diversity within an outlet from diversity across the wider environment.
Fair access	Justifies selection and provides meaningful alternatives for smaller contestants.
Digital application	Separates editorial treatment, paid promotion, platform selection and audience response.
Evidence and limits	Recognises uncertainty, official-role issues and qualitative factors; avoids unsupported causal claims.
Practical response	Proposes a feasible action, responsible actor and timely review without unnecessary interference.

Common misconceptions to correct

"Everyone can post, so access is equal." The ability to publish says little about discovery, resources, accessibility or arbitrary exclusion.

"More engagement proves unfairness." Interactions are neither unique people nor votes. Examine the mechanism and relevant obligation.

"Many partisan outlets make a pluralistic public broadcaster unnecessary." External diversity does not replace internal public-service responsibilities.

"Balance requires equal treatment of true and false claims." Fairness requires accurate reporting and appropriate scrutiny, not artificial equivalence.

Comparing election experiences

SESSION METHOD Small-group comparison using Sheet 4 | TIME 20 minutes in the extended route

Guidance for trainers

Select two of the four core cards on Sheet 4 before the session. Allow two minutes to read, eight to compare, five to report and five to debrief. Ask for an observation, an interpretation, a missing fact and a practical lesson. The cards summarise selected findings, not complete election assessments.

The core cards concern North Macedonia in 2024 and 2025, Albania in 2025 and Bosnia and Herzegovina in 2024, all drawn from ODIHR reports on Council of Europe member states. Serbia's 2024 example remains in Session 4. For an optional comparison, substitute Kosovo for one card rather than adding time. Do not present another jurisdiction's rules as binding locally. [6–11]

Debrief

North Macedonia: distinguish allocation rules, actual editorial coverage and audience engagement. The 2024 and 2025 cards raise related but different questions; neither their juxtaposition nor a high-engagement ranking establishes an unchanged legal gap or an electoral effect.

Albania: distinguish a monitoring referral from an established breach. For the platform restriction, ask what evidence would establish effects on contestants' opportunities and voters' information. Do not assume all contestants depended equally on the channel.

Bosnia and Herzegovina: uneven posting can coexist with comparatively non-inflammatory content. The favourable finding is limited to monitored actors; it does not establish campaign-wide fairness or an absence of harm outside the sample.

Kosovo, if selected: ask how journalism can add policy comparison and scrutiny to image-led campaigning. The viral-post sample cannot represent every post or every voter's exposure. Keep this as the sole optional comparison outside the CoE-member-state core.

Completion

SESSION METHOD Individual learning check and practical commitment | TIME 5 minutes

Assessment and reflection

Return to the initial agree–disagree proposition. Ask participants to write a short answer to these questions, then invite two contributions:

- What is the difference between internal and external pluralism? Give one online example.
- Why might equal interview time fail to produce fair editorial treatment?
- What can an outlet control about online visibility, and what can it not guarantee?
- What one change will you make to your professional practice, and who needs to be involved?

Trainer answer guide and follow-up

Look for diversity within a service versus across independent sources; recognition of framing and prominence; and separation of editorial decisions from platform and audience behaviour. Participants should identify a specific action within their remit, not promise a universal solution.

After delivery, record unresolved national questions and misconceptions for the next module. Invite participants to test their proposed change against a real coverage decision and report back through the training organiser’s agreed follow-up channel.

Training of trainers guidance and assessment

Module-specific facilitation

Use examples that make participants compare equality, equity and pluralism rather than search for one numerical formula. Common misunderstandings include assuming that every contestant must receive identical coverage in every format, treating external pluralism as a defence for failures by public service media, and reading tone figures without context. Ask groups to disclose their selection criteria before they know which party benefits. When using real election findings, retain the source, period, outlets and methodological limitations.

Audience-specific application

Regulators and lawyers should assess criteria, consistency and remedy. EMBs and policymakers should examine the overall conditions for electoral competition. Journalists should design a defensible debate or coverage plan. Civil society and observers should test internal and external pluralism using available evidence. Mixed groups should produce different outputs from the same scenario and compare where their mandates overlap.

Assessment and evaluation

Use the opening fairness question as the baseline. During the coverage-plan exercise, assess whether participants define the media type, programme purpose, criteria, meaningful alternatives and safeguards against discrimination. The comparison exercise and completion task form the exit assessment.

Evidence of learning and trainer reflection

Participants meet the objective when they can explain internal and external pluralism, distinguish equal from equitable treatment, justify selection criteria, and identify both quantitative and qualitative indicators of unfairness. Collect one minute-paper response: What evidence would change your conclusion? Trainers should record whether the exercise exposed an audience-specific misconception.

Audience adaptation and standards

Changing the task without duplicating the module

The five audiences use the same concepts and facts. Adapt the technique and professional product as follows; use the allotted exercise time rather than adding another session.

Audience	Technique and expected output
Regulators and supervisory authorities	Simulated access complaint. Establish jurisdiction, request necessary evidence and draft a short reasoned response with a proportionate remedy or referral.
Election management bodies	Coordination exercise. Distinguish official voter information from campaigning; prepare a referral route and timetable without assuming authority over all media or platforms.
Legal professionals and policymakers	Judges review a proposed intervention; lawyers argue for different parties; policymakers redraft an ambiguous access rule. Require each to distinguish current law from reform.

Audience	Technique and expected output
Journalists and media practitioners	Newsroom simulation. Produce a debate and publication plan, choose and caption online clips, and defend criteria to an excluded contestant.
Civil society and election observers	Evidence clinic. Write a short finding separating observation, standard, assessment and recommendation; state sample limits and what cannot yet be concluded.

Resources and source locators

Use the identified versions for the historical cases; update national law and any current platform policies before delivery. Numbers in brackets in the guidance refer to this list.

[1] Council of Europe, CM/Rec(2022)12, Appendix, Scope and definitions paragraphs 4–6; sections 1–3. Open source

[2] Council of Europe, CM/Rec(2007)15, editorial independence, broadcasting, news and access; read alongside its Explanatory Memorandum. Direct link to the Recommendation: Open source

[3] Council of Europe, CM/Rec(2018)1, Appendix section 2, media pluralism and diversity of content. Open source

[4] European Convention on Human Rights, Article 10 and Article 3 of Protocol No. 1. Open source

[5] Venice Commission, Code of Good Practice in Electoral Matters, CDL-AD(2002)023rev2-cor, section I.2.3 on equality of opportunity. Open source

Election reports and source locators

The core examples use ODIHR final reports. Use the page locators below to supply extracts; printed page numbers may differ from a PDF viewer's page count. Findings concern the stated election and monitoring scope, not necessarily current law or practice.

[6] ODIHR, North Macedonia Local Elections, 19 October and 2 November 2025, Final Report, 7 April 2026, sections X.B–C, printed pp. 23–25; personal-data incident, section VIII.B, p. 19. Open source

[7] ODIHR, Serbia Local Elections, 2 June 2024, Final Report, 30 August 2024, section VIII, printed pp. 15–16. Open source

[8] Optional comparison only: EU EOM, Kosovo Parliamentary Elections, 9 February 2025, Final Report, section XIII.c, printed pp. 35–36. Open source

[9] ODIHR, North Macedonia Presidential and Parliamentary Elections, 24 April and 8 May 2024, Final Report, 23 September 2024, section VIII.C, printed pp. 17–18, including footnotes 61–63. Open source

[10] ODIHR, Albania Parliamentary Elections, 11 May 2025, Final Report, 23 October 2025, section IX, printed p. 19, and section XI.B, p. 24. Open source

[11] ODIHR, Bosnia and Herzegovina Local Elections, 6 October 2024, Final Report, 25 February 2025, section VIII, printed pp. 15–16 and footnote 56. Open source

Further reading: OSCE/ODIHR handbooks on media monitoring and observation of election campaigns through social networks; the supplied IDRA/MEMO 98 Albania 2013 report; applicable national laws, regulatory guidance and professional codes.

All references to Kosovo in this module shall be understood in full compliance with United Nations Security Council Resolution 1244 and without prejudice to the status of Kosovo.

Module 3: Fairness, pluralism and equitable treatment

Training material to be shared with participants

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Sheet 1 Opening discussion and concept sorting

Agree or disagree

“An election debate is fair only if every registered contestant participates on identical terms.”

Choose strongly agree, agree, undecided, disagree or strongly disagree. Explain your reason and identify any additional facts you need. You may change your position after listening to others.

Scenario

Fifteen parties contest a parliamentary election. A public service broadcaster offers equal free slots, but invites only parties polling above five per cent to its main leaders’ debate. It offers the remaining parties interviews and another debate. It posts clips of the main debate prominently on its social accounts; other interviews are available through a less visible website link.

Questions

- Should the same allocation rule govern free slots, news, debates and online clips?
- Are polls alone sufficient for selection? What alternatives would be meaningful?
- Would your answer differ for a private editorial outlet?
- What changes when a platform, rather than the broadcaster, selects what appears in a user’s feed?

Concept sorting

For each situation, decide whether it primarily concerns diversity within one outlet, diversity across the wider media environment, or how users encounter information. Explain any overlap.

1. One news outlet interviews a broad range of contestants and affected communities throughout the campaign.

2. Several websites with different names use the same owner, editor and political content.

3. A platform hosts many sources, but users encounter different selections through their subscriptions and recommendations.

Your initial view

Which example most resembles a challenge in your professional work? What would you need to investigate before reaching a conclusion?

Sheet 2 Design a fair coverage plan

Hypothetical scenario

Twelve parties contest a four-week parliamentary election: three have parliamentary seats, four have measurable support without seats, and five are new or very small. The governing party’s leader is also prime minister. Polls differ in their estimates for smaller parties and have margins of error.

The public service broadcaster must provide free airtime. It plans daily news, interviews and two leaders’ debates. It also publishes full interviews online, produces short clips for social platforms and sends app notifications. It has limited production staff. A private national television channel plans one prime-time debate. An independent online news outlet plans policy interviews and a live discussion.

Some parties have large social followings and advertising budgets; others have little online presence. A party with no parliamentary seats is particularly active on social media. Some rural voters rely on radio and television, and some audiences need minority-language or accessible content.

The prime minister opens public facilities during the campaign. A government institutional account posts videos of the events, including a message praising the governing party’s achievements. The source of funds for promoting the videos is unclear.

Platforms distribute content through personalised feeds. A small party complains that its interviews are difficult to find and asks for the same online reach as the governing party.

Task

Your trainer will assign your professional role: editor, regulator, election official, legal professional, policymaker or observer. Produce a short plan, decision, legal argument, revised rule or observation finding appropriate to that role.

Address selection for interviews and debates, meaningful alternatives, official activity, editorial clips and promotion, accessibility and a timely complaints or review route. Separate what your institution can decide from matters requiring another actor's action. Identify missing facts rather than inventing them.

Questions for your group

- Where is equal allocation appropriate, and where might differentiation be justified?
- How will you avoid excluding new contestants solely because they lack past representation or followers?
- What makes an alternative genuinely useful for the relevant audience?
- Which decisions belong to an editor, an advertiser, a platform or the audience?
- What evidence is needed about the institutional videos and their funding?
- What will your response protect for voters, contestants and editorial independence?

Peer review

Exchange proposals. Identify one strength, one risk and one missing fact. Revise one element after hearing the other group's feedback and explain your change.

Sheet 3 Compare presentation and official communication

Item A Two interviews and their online extracts

An outlet gives two candidates ten-minute interviews. In both, the interviewer asks about the affordability of their economic proposals. Candidate A's published social clip contains an uninterrupted policy explanation and a neutral title. Candidate B's clip begins with a hesitation, excludes the subsequent explanation and uses the caption "Can this candidate answer a basic question?" The outlet sends a notification promoting A's interview but none for B.

The editor says the clips reflect audience interest. The full interviews remain available online. No information is supplied about other clips, publication criteria, promotion budgets or audience reach.

Task and questions

Assess the treatment, not the candidates' policies. Identify what you know, what concerns you and what evidence you would request. Suggest a response appropriate to your professional role.

- Does equal interview length resolve the question?
- Which decisions were controlled by the outlet?
- What context could justify or challenge the differing treatment?
- Can the full interviews remedy any misleading impression created by the clips?
- What can you conclude without evidence about platform recommendations or viewers' responses?

Item B A public event during the campaign

Six days before polling, the prime minister opens a new health centre. The government website publishes practical information about services. The institutional social account posts the ceremony with a party slogan and the caption "Keep this progress going." The same video appears on the party's

campaign account. Journalists receive official footage but no opportunity to ask questions. It is not clear who paid to promote the institutional post.

Task and questions

Decide which facts need checking and propose a proportionate professional response.

- What distinguishes public information, legitimate news and campaign promotion here?
- Does it matter who controls, staffs and funds each account?
- What should an editor do with the supplied footage?
- Which institution, if any, could address the concern under the applicable national rules?
- How could useful information remain available while any established problem is corrected?

Group output

Prepare three short statements: your provisional assessment, the most important missing evidence, and one action within your remit. Both items are hypothetical training scenarios.

Sheet 4 Compare recent election experiences

Your trainer will select two core cards for comparison. Each summarises selected findings from a Council of Europe member state. Kosovo, on the following page, may replace one card as an optional comparison.

Case A North Macedonia local elections in 2025

ODIHR reported that state-funded political-advertising allocations favoured major parties and disadvantaged smaller contestants, particularly in runoffs. Its broadcast monitoring nevertheless found election-related coverage overall balanced and generally neutral in tone.

Source: ODIHR Final Report, 7 April 2026, sections X.B–C, pp. 23–25; resource [6] in trainer guidance. This is a summary of selected findings, not a complete election assessment.

Case B North Macedonia presidential and parliamentary elections in 2024

Within ODIHR's monitoring of 19 Facebook accounts, the VMRO-DPMNE leader accounted for 18 of the 20 highest-engagement posts. The report identified an unregulated digital campaign environment and recommended addressing online campaigning, advertising and financing. The ranking is not a count of all posts nationally or evidence of electoral impact.

Source: ODIHR Final Report, 23 September 2024, section VIII.C, pp. 17–18, footnotes 61–63; resource [9].

Case C Albania parliamentary elections in 2025

The CEC monitored accounts of 150 public institutions. Between 11 April and 9 May, it referred 10 posts for investigation as potential breaches of its regulations. Separately, ODIHR criticised the government's March TikTok ban; some interlocutors reported adverse effects on contestants' ability to campaign on equal terms.

Source: ODIHR Final Report, 23 October 2025, pp. 19 and 24; resource [10]. Referrals are not final findings of violations; the reported effects of the ban are attributed to interlocutors.

Case D Bosnia and Herzegovina local elections in 2024

ODIHR followed 63 actors on Facebook and X, of whom 46 were active. Posting frequency differed markedly, but tone was largely neutral to positive. It detected no systematic disinformation or hate-speech effort through those actors, while noting some inflammatory posts. This finding does not describe the entire online campaign.

Source: ODIHR Final Report, 25 February 2025, section VIII, pp. 15–16, footnote 56; resource [11].

Comparison task

Compare the two selected cards. Identify the fairness or pluralism question, the limits of the evidence and one practical lesson for your national context. Do not assume identical legal rules.

- Can balanced reporting coexist with unfair access arrangements?
- What can posting frequency or engagement establish, and what can it not?
- What distinguishes a potential violation from an established breach?
- Which findings concern a rule, editorial practice, distribution or audience behaviour?

Optional Kosovo comparison

Use this card only if your trainer selects it instead of a core card. It provides an additional comparison, not a statement of locally applicable law.

Kosovo parliamentary election in 2025

The EU EOM evaluated 5,262 posts selected for virality from 246 pages. It found that 74 per cent lacked specific messages, mainly promoting a party or candidate's image or reflecting offline events. It also reported more than 7,000 election-related Facebook and Instagram ads with expenditure exceeding EUR 250,000, including third-party ads.

Source: EU EOM Final Report, section XIII.c, pp. 35–36; resource [8]. The selected-post sample does not represent all online content or all users' exposure.

Optional comparison questions

Compare this card with one of the core cards on the previous page.

- Do numerous posts and advertisements necessarily provide useful policy information?
- What can independent journalism add to contestants' own online communication?
- What further evidence would you need about voters' actual exposure and information needs?

Final reflection

Explain internal and external pluralism using an online example. Identify one professional practice you would change and the person or institution you would need to involve.

All references to Kosovo shall be understood in full compliance with United Nations Security Council Resolution 1244 and without prejudice to the status of Kosovo.

COUNCIL OF EUROPE

HUMAN RIGHTS, DEMOCRACY AND THE RULE OF LAW



DROITS DE L'HOMME, DÉMOCRATIE ET ÉTAT DE DROIT

CONSEIL DE L'EUROPE

MODULE 3
FAIRNESS, PLURALISM AND EQUITABLE TREATMENT

Purpose and learning outcomes

- Explain internal and external pluralism
- Apply pluralism to broadcast and online editorial output
- Distinguish equality, equity, impartiality and balance
- Assess access criteria and meaningful alternatives
- Identify qualitative and digital sources of unfairness
- Produce a reasoned professional response

75, 90 AND 120 MINUTE ROUTES

Fairness in a hybrid media environment

CONTESTANTS	VOTERS	EDITORIAL MEDIA
Meaningful opportunity	Useful, diverse information	Independent choices

Platforms add discoverability, paid promotion, ranking and moderation questions.

Opening proposition

"An election debate is fair only if every registered contestant participates on identical terms."

STRONGLY AGREE | AGREE | UNDECIDED | DISAGREE | STRONGLY DISAGREE

ACTIVITY | SHEET 1 | 10 MINUTES

Four related concepts

EQUALITY	Same allocation for similarly situated contestants
EQUITY	Fair differentiation using relevant and consistent criteria
IMPARTIALITY	No improper preference in selection or treatment
BALANCE	Appropriate attention across defined output and time

Internal and external pluralism

INTERNAL PLURALISM

Diversity of political and social voices within one outlet or service

EXTERNAL PLURALISM

Diversity across genuinely independent outlets, owners, editorial positions and sources

The two forms complement one another.

Available diversity and exposure diversity

AVAILABLE

Sources that exist and can be accessed

ENCOUNTERED

Sources a user actually sees through subscriptions, language, sharing and recommendations

Many available sources can coexist with a narrow individual selection.

Concept sorting

- One outlet interviews diverse contestants and affected communities
- Several differently named websites share one owner, editor and political line
- A platform hosts many sources but users receive different recommendations

Fairness across actors and formats

PUBLIC SERVICE MEDIA	Pluralistic service across broadcast and digital output	**PRIVATE EDITORIAL MEDIA**	Editorial freedom and applicable national duties
FREE ACCESS	Lawful allocation, scheduling and accessibility	**NEWS, INTERVIEWS, DEBATES**	Newsworthiness, scrutiny and meaningful alternatives
PAID PROMOTION	Sponsor, pricing, funding, disclosure and targeting	**PLATFORMS**	Transparent ranking, moderation and consistent rules

Separate the decisions

OUTLET	ADVERTISER	PLATFORM	AUDIENCE
Selects, edits, captions and promotes	Purchases visibility and targeting	Ranks, recommends and moderates	Chooses whether to watch and share

Do not attribute the entire outcome to one actor.

Allocation tools

EQUAL SLOTS	Guaranteed or designated access
PROPORTIONAL ALLOCATION	Clear legal or editorial formula
EDITORIAL SELECTION	Defensible newsworthiness and purpose
ROTATION	Comparable opportunities over time
MINIMUM ACCESS	A meaningful floor for smaller contestants

ACTIVITY | FORMAT MATCHING | 15–20 MINUTES

Access test

PURPOSE	What should voters understand?
RULE	Is the criterion clear, relevant and timely?
EVIDENCE	Are polls and indicators reliable?
CONSISTENCY	Would the rule be acceptable for another party?
ALTERNATIVE	Can excluded contestants reach a relevant audience?
REVIEW	Can an error be corrected while access still matters?

Meaningful alternatives

- Reach the relevant audience in time
- Use useful scheduling and clear promotion
- Provide sufficient space to explain proposals
- Meet language and accessibility needs
- Remain discoverable across the channels audiences use
- Offer a timely route to challenge mistakes

North Macedonia 2025

ACCESS ARRANGEMENTS

State-funded advertising favoured major parties and disadvantaged smaller contestants, especially in runoffs

ACTUAL COVERAGE

Monitored broadcast election coverage was overall balanced and generally neutral

Balanced reporting can coexist with unfair access arrangements.

Incumbency across channels

- Is the official event necessary, routine or staged for electoral benefit?
- In which capacity does the office-holder appear?
- Who controls staff, footage, budgets, mailing lists and accounts?
- How are institutional and party messages separated?
- What cumulative prominence does the office-holder receive?
- Which useful public information should remain available?

Serbia 2024: different evidence, different questions

INSTITUTIONAL ACCOUNTS

ODIHR recorded partisan posts on some official accounts, including mayors and municipalities

CAMPAIGN INTERACTIONS

Eight ruling-party actors: about 1 million interactions
Twelve opposition actors: 228,000

Institutional use raises a public-resource question. Interaction totals alone do not prove electoral effect.

Qualitative fairness

VOICE AND SCRUTINY	Opportunity to explain and answer criticism
FRAMING AND ACCURACY	Headlines, images and edits preserve substance
PROMINENCE	Scheduling, placement, thumbnails and notifications
DISTRIBUTION	Editorial promotion separated from platform and audience action
SOCIAL AND ISSUE DIVERSITY	Policy choices and affected communities represented

Two interviews, different extracts

CANDIDATE A	CANDIDATE B
Uninterrupted policy explanation	Hesitation shown without explanation
Neutral title	Critical caption
App notification	No notification

The full interviews remain online. What evidence is still missing?

PAIRED ACTIVITY | SHEET 3, ITEM A

A public event during the campaign

- The prime minister opens a health centre six days before polling
- The government website publishes practical service information
- An institutional account adds a party slogan and campaign-style caption
- The same video appears on the party campaign account
- Journalists receive footage but cannot ask questions
- The funding of promoted distribution is unclear

Design a fair coverage plan

- Twelve parties contest a four-week parliamentary election
- Public and private broadcasters plus an online outlet cover the campaign
- Polls differ on smaller parties and online followings vary
- The prime minister is also a contestant
- Institutional accounts promote public projects with campaign-like messages
- Platforms distribute content through personalised feeds

Required group output

- Defensible criteria for debates and interviews
- Meaningful alternatives for smaller and new contestants
- Treatment of official activity and institutional accounts
- Safeguards for clips, prominence, language and accessibility
- Separation of editorial, paid and platform distribution decisions
- A timely review or complaints route within the relevant mandate

Peer review and revision

1 STRENGTH

Could the criteria exclude a relevant new party?

1 VULNERABILITY

Is online access merely nominal?

1 MISSING FACT

Does the remedy assume a power the institution lacks?

Revise one element after the challenge and explain the change.

Assessment rubric

- CLEAR SCOPE
- PLURALISM
- FAIR ACCESS
- DIGITAL APPLICATION
- EVIDENCE AND LIMITS
- PRACTICAL RESPONSE

One point for each demonstrated criterion. Several plans may be defensible.

Common misconceptions

"Everyone can post, so access is equal."	Publication says little about discovery, resources or accessibility.
"More engagement proves unfairness."	Interactions are not unique people, votes or proof of impact.
"Partisan outlets replace public-service pluralism."	External diversity does not remove internal responsibilities.
"Balance gives true and false claims equal treatment."	Accuracy and scrutiny do not require artificial equivalence.

Recent election comparison

OPTIONAL OR EXTENDED

NORTH MACEDONIA 2025

Advertising allocation and balanced broadcast coverage

NORTH MACEDONIA 2024

High engagement in an unregulated digital environment

ALBANIA 2025

Institutional-account referrals and a platform restriction

BOSNIA AND HERZEGOVINA 2024

Uneven posting with limited findings in the monitored sample

EXTENDED ACTIVITY | SHEET 4 | 20 MINUTES

Comparison questions

OPTIONAL OR EXTENDED

- Can balanced reporting coexist with unfair access arrangements?
- What can posting frequency or engagement establish?
- What distinguishes a referral from an established breach?
- Does the finding concern a rule, editorial practice, distribution or audience behaviour?
- What evidence limits the conclusion?
- Which lesson transfers without importing another country's law?

One case, different professional tasks

REGULATORS	Decide an access complaint and remedy	**EMBs**	**OPTIONAL OR EXTENDED** Design coordination and referral
LAWYERS / JUDGES	Argue or review an intervention	**POLICYMAKERS**	Redraft an ambiguous access rule
JOURNALISTS	Produce and defend a coverage plan	**CIVIL SOCIETY / OBSERVERS**	Write an evidence-based finding

Learning check

- Explain internal and external pluralism using an online example
- Explain why equal interview time may still produce unfair treatment
- State what an outlet controls about online visibility
- Identify one practice you will change and the actor you need to involve

ASSESSMENT | 5 MINUTES

Key messages

- Fairness supports informed choice and meaningful opportunities
- Internal and external pluralism are complementary
- Formal access may fail when alternatives lack prominence or accessibility
- Online publication does not guarantee discovery or equal reach
- Tone, framing, context and prominence matter across channels
- Evidence disparities prompt investigation rather than automatic conclusions

END OF MODULE 3