Module 6: Digital platforms and political advertising

Training material to be shared with trainers only

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This module helps participants examine how digital platforms shape electoral communication through advertising systems, recommender systems, moderation and data practices. It treats political advertising as a chain involving the sponsor, service providers, publisher, targeting method, audience and financing. It also covers paid influence that may appear organic, including compensated creators, proxy pages and paid-for editorial coverage.

Use the separate participant workbook for all activities. Keep the worked assessments and debrief guidance in this trainer document until the exercises are complete. Exercises can be delivered with printed screenshots and fictional records and do not require participants to enter live accounts or closed groups.

The Council of Europe layer applies across member States. The Digital Services Act and Regulation (EU) 2024/900 on the transparency and targeting of political advertising apply in the EU and only where their territorial and material scope is met. National electoral, campaign-finance, broadcasting, advertising and data-protection rules remain essential.

Trainer overview

Module objective

Enable participants to identify political advertising and other paid electoral influence; distinguish legal duties from platform policies; assess transparency, targeting, fairness and systemic risks; document evidence; and select a proportionate response within the mandate of the responsible actor.

Learning outcomes

- Explain how platforms influence visibility through paid delivery, recommendations, moderation, search and creator networks.
- Distinguish political advertising from unpaid political expression, editorial content, official voter information and commercial advertising, while recognising borderline issue-based communication.
- Apply the Council of Europe principles of transparency, fair treatment, editorial independence and freedom of expression to online services.
- For relevant EU contexts, identify the separate functions of the DSA, Regulation (EU) 2024/900, data-protection law, campaign-finance law and voluntary platform policies.
- Examine sponsorship, ultimate control, expenditure, source of funds, targeting parameters and delivery data.
- Assess microtargeting, inferred characteristics, sensitive data, exclusion and algorithmic amplification without claiming knowledge the available data cannot establish.
- Design a proportionate monitoring and referral record and explain its evidential limits.

Session techniques and methods

Classification exercise; advertising-chain map; transparency-notice audit; targeting and fairness scenario; repository investigation; role simulation; recent-case comparison; individual exit task. Provide large-print records and seated roles where required. Do not require participants to disclose their political views or personal advertising profiles.

Duration

Standard route: 120 minutes. Condensed route: 90 minutes. Extended route: 180 minutes. Timing includes instructions, group work, reporting and debriefs but excludes breaks, translation and preparation. The standard route completes Sheets 1–5. The extended route adds comparative institutional drafting and the Houdini Ads case.

Relationship to other modules

Module 2 supplies the legal and proportionality framework. Module 3 explains fairness and pluralism, Module 4 supplies monitoring discipline, and Module 5 covers disinformation and manipulation. This module focuses on platform systems, advertising transparency, targeting and accountability. Module 7 develops protection and inclusion, while Modules 8 and 9 address wider violations, remedies and resilience.

Preparation and route selection

Trainer checklist

- Map the platforms, search engines, messaging services, ad intermediaries, publishers and creator networks relevant to the national campaign. Do not assume one platform policy applies to every service or country.
- Identify the competent election, campaign-finance, media, advertising, consumer, data-protection and digital-services authorities. Record overlaps, referral routes and deadlines.
- Separate four layers in every exercise: Council of Europe standards; applicable EU law; national law; and contractual platform policy.
- Verify whether paid political advertising is permitted, prohibited or limited in each medium and whether third-party campaigning, issue advertising and public-authority advertising fall within the rules.
- Check current platform advertising policies and repository access shortly before delivery. Interfaces, categories and retention practices change.
- Print Sheets 1–6 without trainer answers. Use archived or fictional ads. Remove personal data that are unnecessary for the task.
- Consult regulators, EMBs, campaign-finance bodies, data-protection authorities, media, journalists' associations, civil society and observers when adapting the examples.
- Prepare a referral map. A transparency failure, unlawful data use, campaign-finance breach and manipulative narrative may require different authorities and evidential tests.

Route table

Session	90 min	120 min	180 min
1 Platform environment	5	10	15
2 Advertising and sponsored influence	15	20	30
3 Standards and regulatory layers	15	20	30
4 Targeting and recommender systems	15	20	30

Session	90 min	120 min	180 min
5 Monitoring and evidence	20	25	35
6 Assessment and response	10	15	20
7 Developments and cases	5	5	10
8 Learning check	5	5	10

For 90 minutes, distribute the legal map before the session, use Items A–D in Sheet 1 and one ad record in Sheet 4. For 120 minutes, complete the core sheets and compare two professional roles. For 180 minutes, add the platform-ban circumvention case, a second monitoring record and joint institutional drafting. Never remove the distinctions between law and policy or between observation and inference.

Core messages that should remain constant

- Platforms do more than host speech. Advertising tools, recommendation systems, search ranking, moderation and design choices influence what voters encounter and how quickly it circulates.
- Political advertising involves a service supplied for remuneration or as an in-house activity and political purpose or sponsorship. Ordinary unpaid political opinion and editorial content require separate analysis.
- Transparency should let a voter recognise an ad, identify its sponsor and ultimate controller, understand the linked political process, see who paid and know why the ad reached them.
- Labelling alone does not establish meaningful transparency. Information must be accurate, prominent, accessible, timely and connected across the advertising chain.
- Targeting can help contestants reach relevant audiences at modest cost, but hidden segmentation can fragment debate, facilitate inconsistent promises and exclude groups from information.
- Paid influence may migrate when platforms prohibit formal political ads. Monitor compensated creators, proxy organisations, paid partnerships, direct publisher sales and disguised or misclassified advertising.
- A platform ban is a private policy choice, not a legal prohibition on political communication. Organic content normally remains available, and national or EU legal duties may still apply to other services.
- Repository data show delivery and spending only to the extent captured and disclosed. Missing ads, broad ranges, changing definitions and unavailable targeting data must appear in the findings.
- Institutions should coordinate evidence and referrals while preserving independent mandates. No single authority necessarily controls the complete chain.
- Regulation and enforcement must protect political expression, pluralism, privacy, equal opportunity and access to information. Measures require a clear basis, due process and proportionality.

The platform information environment

SESSION METHOD Platform influence map using Sheet 1 | TIME 5, 10 or 15 minutes

Five mechanisms of visibility

Mechanism	Electoral question
Paid delivery	Who purchased distribution, through which service, at what cost and for which audience?
Recommendation and ranking	Which signals influence what appears in feeds, search, suggested videos or trending areas? What meaningful user choices exist?
Organic networks	Which contestants, creators, media, supporters and proxy pages can generate reach without buying an ad?
Moderation and enforcement	Which content or behaviour rules apply, how consistently are they enforced, and what notice and remedy exist?

Mechanism	Electoral question
Data and measurement	Which public records, repositories, researcher access and audit evidence permit independent scrutiny?

Guidance for trainers

Ask groups to map one campaign message across the mechanisms. A candidate may publish an unpaid video, supporters may share it, a creator may receive compensation, an advertiser may boost a version, and the recommender may expand its audience. Each stage raises different transparency and responsibility questions.

Avoid describing an algorithm as a single editor. Recommender systems use multiple signals and change over time. Public engagement cannot show precisely why an individual received a post. Phrase findings at the level supported by evidence: “recommended to the monitored research account” is stronger than “the algorithm promoted this to voters nationally”.

Public-interest balance

Digital communication can lower entry costs and give smaller contestants direct access to voters. It can also intensify advantages based on money, data, incumbency, celebrity or network reach. The task is to identify conditions affecting equal opportunity and voter information without demanding mechanical equality of every user’s feed.

Political advertising and sponsored influence

SESSION METHOD Classification and advertising-chain map using Sheets 1–2 | TIME 15, 20 or 30 minutes

Working categories

Category	Practical treatment
Official political ad	Paid placement by, for or on behalf of a political actor. Record sponsor, beneficiary, payer, service, amount, period, audience and label.
Issue-based political ad	Paid message designed to influence an election, referendum, voting behaviour or legislative or regulatory process. Context and purpose matter.
Third-party advertising	Paid communication by a person or organisation other than the contestant. Establish control, coordination, beneficiary, source of funds and national reporting duties.
Influencer or creator content	Determine whether money, benefits, direction or another consideration was provided. A personal unpaid opinion requires different treatment.
Paid-for coverage	Editorial-looking material produced or published for payment or benefit. Examine disclosure, media ethics, advertising law and electoral-finance rules.

Category	Practical treatment
Public-authority communication	Official information may be legitimate. Assess timing, content, branding, audience and whether public resources promote an incumbent or campaign message.
Organic political content	Unpaid political expression distributed through ordinary accounts. It may still engage platform rules or other law, but it is not automatically advertising.
Voter information	Neutral communication about registration, candidates, procedures or participation by a competent body. Safeguards should prevent partisan advantage.

Guidance for trainers

Political advertising definitions differ. Begin with the applicable instrument and the facts, not the label used by the advertiser or platform. Ask whether a service was provided for remuneration, including benefits in kind, and whether the communication was by a political actor or designed to influence a political process.

Regulation (EU) 2024/900 excludes personal views expressed in a purely personal capacity and editorial content subject to editorial responsibility unless specific payment or other remuneration is provided for its preparation, placement, promotion, publication or dissemination. National law may use a different definition or wider campaign period. [3]

The advertising chain

Actor or element	Evidence to seek
Sponsor	Identity, legal status, political-actor relationship and declaration supplied to service providers.
Ultimate controller	Entity that ultimately controls the sponsor, including an organisation behind a nominal purchaser.
Payer and source of funds	Invoice, account, public or private origin, domestic or foreign source, benefit in kind and campaign-finance reporting.
Service providers	Agency, creator, publisher, platform, exchange and other intermediaries involved in preparation or delivery.
Publisher and placement	Where and when the ad appeared, its format, label, transparency notice and linked political process.
Targeting and delivery	Inclusion and exclusion criteria, personal-data categories, consent, optimisation, audience size, impressions and geography.
Beneficiary and coordination	Contestant or cause assisted, operational links, shared assets, instructions and whether expenditure should be attributed.

Paid, owned and earned visibility

Paid visibility includes purchased advertising, boosted posts, sponsored search, compensated creators and other consideration. Owned visibility uses a contestant's accounts, website or mailing list. Earned visibility includes journalism and voluntary sharing. The boundaries blur when campaigns supply scripts, creators receive non-monetary benefits, or media reproduce promotional material without disclosure.

Trainer debrief for Sheet 2

A transparent ad should answer the voter's immediate questions without requiring specialist research. The label should be visible at first encounter. The notice should permit scrutiny of sponsor and ultimate control, linked process, dissemination period, expenditure or value, source of funds, service provider, targeting or delivery techniques, audience and reach data where required.

Do not treat a complete-looking notice as verified. Compare it with campaign reports, invoices where accessible, beneficial-ownership information, repository records and the content itself. Record discrepancies rather than choosing the most convenient source.

Standards and regulatory layers

SESSION METHOD Legal map and notice audit using Sheet 3 | TIME 15, 20 or 30 minutes

Council of Europe framework

CM/Rec(2022)12 complements CM/Rec(2007)15 for a convergent environment. It recognises editorial independence and fair treatment, calls for political advertising to be readily recognisable, and addresses transparency concerning sponsorship and financing. For online platforms, it calls for transparency concerning the criteria used to distribute political advertising, safeguards against

abusive use of personal data, and access to data for independent research. Restrictions and platform measures should be transparent, non-discriminatory and use the least restrictive effective means. Read these principles with Article 10 ECHR and Article 3 of Protocol No. 1. [1–2]

These standards guide all Council of Europe member States. They do not create identical national advertising rules. Trainers should distinguish a recommendation, a binding treaty obligation, directly applicable EU law, national legislation and a private service rule.

European Union layer where applicable

Instrument	Main function in this module
Regulation (EU) 2024/900 TTPA	Harmonised transparency for political advertising services; labels and notices; sponsor and financing information; repository arrangements; targeting and delivery rules; oversight and sanctions. Most provisions have applied since 10 October 2025.
Digital Services Act	Advertising transparency; VLOP and VLOSE ad repositories; recommender-system transparency and user choice; systemic-risk assessment and mitigation for civic discourse and elections; audits and vetted-researcher access.
GDPR and related data law	Lawfulness, fairness, transparency, purpose limitation, data minimisation, special-category data, profiling, consent and rights of data subjects.
National election and campaign-finance law	Permission or prohibition by medium; campaign period; expenditure limits; third parties; foreign funding; silence periods; reporting, oversight and remedies.

The instruments overlap but answer different questions. TTPA does not decide whether an ad's political claim is true. It also does not replace national rules concerning campaign finance, electoral periods, broadcasting or substantive legality. [3–5]

TTPA practical map for EU contexts

Recognition and transparency

Each political advertisement must carry a clear statement that it is political, identify the sponsor and any entity ultimately controlling it, identify the related election, referendum or legislative or regulatory process where applicable, and provide a transparency notice or clear route to it. The notice includes further information on dissemination, amounts and benefits, source of funds, service providers and targeting or delivery where applicable. [3]

Targeting and delivery

Where online political advertising uses personal data, Regulation (EU) 2024/900 permits targeting or ad-delivery techniques only under specified conditions. The controller must have collected the data from the individual, obtained separate explicit consent for political advertising, and must not profile using special categories of personal data. Additional safeguards apply to younger persons, and users who do not consent must receive an equivalent alternative without political advertising. Articles 18–19 contain the operative requirements. [3]

Repositories and records

The Regulation provides for a European repository. VLOPs and VLOSEs use their DSA repositories and connect the required information to the European repository. Other online political advertising publishers submit material through the provided hosting function. Retention and accessibility support public, regulatory and research scrutiny. Trainers should verify the repository's operational status and applicable implementing measures at the date of training. [3]

Cross-border services before elections

For three months before an election or referendum in an EU Member State, political advertising services relating to that vote generally may not be supplied to a sponsor established outside the Union, subject to the Regulation's exact terms. National foreign-funding rules may impose other restrictions. [3]

Enforcement caution

Do not quote the Regulation's maximum sanction as if every breach attracts it. Identify the competent authority, breached provision, evidence, procedure, gravity, duration and national penalty framework. A platform's refusal to offer political advertising does not end the need to detect advertising that slips through or migrates to other channels.

Targeting, data and recommender systems

SESSION METHOD Targeting and fairness scenario using Sheet 3 | TIME 15, 20 or 30 minutes

Targeting questions

Dimension	Assessment question
Data source	Did the controller obtain the data from the person, a broker, inferred behaviour, a voter file or another source?
Consent and choice	Was consent separate, explicit, informed and withdrawable? Is an equivalent service available without political advertising?
Characteristics	Are special-category data used directly or through profiling? Are proxy variables likely to reproduce sensitive targeting?

Dimension	Assessment question
Inclusion and exclusion	Who is deliberately reached or excluded? Could essential voter information or competing claims become invisible to some groups?
Message variation	Do different audiences receive materially inconsistent promises, identity appeals or procedural information?
Delivery and optimisation	Which parameters did the sponsor choose and which did the service optimise? Was AI used in targeting or delivery?
Accountability	Can the user understand “why am I seeing this”, exercise rights and access the full transparency notice?

Microtargeting and fairness

Microtargeting can help a small contestant reach a geographically or linguistically relevant audience. The same capability can exploit vulnerabilities, conceal contradictory messages and make public contestation difficult. Avoid assuming that a narrowly delivered ad changed votes. Establish the data, audience, scale and message variation first, then assess plausible harm.

Recommender systems

Paid targeting and organic recommendation are distinct. Ad targeting selects or optimises a paid audience. Recommender systems rank organic and paid content according to service design and user signals. Under the DSA, VLOPs and VLOSEs must address systemic election risks through reasonable, proportionate and effective measures. The Commission’s 2024 election guidelines cover internal resources, election-specific risk assessment, mitigation, recommender systems, political-ad transparency, influencer cooperation, incident response and post-election review. [4–5]

Monitoring and evidence

SESSION METHOD Repository investigation using Sheet 4 | TIME 20, 25 or 35 minutes

Monitoring question before tool selection

Define what the project must establish: compliance with labels; sponsor and funding transparency; campaign expenditure; third-party support; targeting; unequal access; state-resource use; policy evasion; or the content and audience of paid messages. No single repository answers all these questions.

Minimum ad record

Field	Record and limitation
Identification	Platform or publisher, ad ID or URL, account or page, capture time and collector.
Content	Creative, text, audio, language, call to action, linked page and versions. Preserve the ad without republishing harmful personal data.

Field	Record and limitation
Political link	Sponsor or actor, beneficiary, issue, election or process and reason for classification.
Transparency	Label, notice, sponsor, ultimate controller, payer, funding source, service provider and missing fields.
Delivery	Start and end, active status, impressions or reach, frequency, geography and the platform's definitions or ranges.
Expenditure	Amount or range, currency, campaign total if available, invoiced party and reconciliation status.
Targeting	Sponsor-selected criteria, exclusions, data categories, optimisation, inferred audience and "why this ad" information.
Legal and policy status	Potential rule, competent body, platform policy and uncertainty. Do not collapse them into one compliance verdict.
Evidence	Screenshot, machine-readable export, repository link, public report, chain of custody and access limitation.

Sampling

Define platforms and publishers, contestants and third parties, languages, geography, campaign period and collection frequency. Archive at regular intervals because active status and repository results can change. Use consistent search terms and document logged-out, research-account or authenticated conditions. Do not compare raw platform metrics as though they share definitions.

Evidence limits and quality control

What repositories can and cannot show

Repositories may provide creative content, dates, sponsor labels, ranges for spending or impressions, and broad audience data. They may omit rejected or misclassified ads, delete entries, use wide ranges, change interfaces, or give incomplete targeting details. Formal spending can migrate to direct contracts, creators or intermediaries outside the repository.

Absence from a repository means “not found under this method and date”, not “the ad never existed”. A complete record does not prove the sponsor’s declaration is accurate. Triangulate with campaign accounts, transparent bank accounts where available, invoices or procurement, publisher disclosures, creator labels, corporate registers, platform statements and interviews.

Quality checks

- Keep the original capture and a working copy. Record local time, time zone, account state and collection method.
- Use a written codebook for political relevance, sponsor type, beneficiary, label, funding, targeting and suspected evasion.
- Double-code a sample and resolve disagreements. Treat borderline issue advertising as a documented judgment.
- Separate exact values from platform ranges and estimates. Never convert a range midpoint into an observed expenditure without explanation.
- Record unavailable fields and changes in access. Methodological limitations belong in the findings and recommendations.
- Protect personal data. Do not build political profiles of individual voters or enter closed spaces without a lawful, ethical and necessary method.

Trainer debrief for Sheet 4

The fictional evidence supports a documented discrepancy: an ad with electoral purpose appears under a non-political category and lacks the expected political-ad information. It does not by itself prove who caused the classification, whether the sponsor intended evasion, how many unique voters saw it, or whether votes changed. The next steps are preservation, comparison with near-identical versions, sponsor and financing checks, and referral under the correct legal or policy route.

Institutional assessment and response

SESSION METHOD Multi-role decision exercise using Sheet 5 | TIME 10, 15 or 20 minutes

Response ladder

1. Preserve the ad, notice, repository record, URL, timestamps and collection conditions.

2. Verify classification, sponsor, beneficiary, funding, targeting and the rule in force on the relevant date.

3. Assess urgency, scale, election phase and risk to voter information, privacy, fairness or campaign finance.

4. Contact the sponsor, publisher or platform where clarification or correction can resolve the gap.

5. Refer to the competent authority with a concise evidential record. Separate a platform-policy report from a legal complaint.

6. Use interim or coercive measures only where authorised and necessary. Preserve notice, reasons, equality of treatment, review and appeal.

7. Publish findings in language proportionate to the evidence and update them when the record changes.

Roles

Audience	Decision in the exercise
Regulator or supervisory authority	Identify jurisdiction, evidence threshold, interim measure, cooperation need and remedy.
EMB	Protect accurate voter information, maintain neutrality, refer matters outside its mandate and document election impact.
Judge or lawyer	Test definition, attribution, evidence, due process, proportionality and effective remedy.
Policymaker	Close responsibility gaps without vague duties that chill editorial or political expression.
Journalist or media practitioner	Verify sponsorship and payment, label commercial relationships, expose evasion and protect editorial independence.
Civil society or observer	Monitor consistently, report limitations, support public scrutiny and avoid presenting analytical indicators as legal findings.

Coordination boundary

Authorities can share lawful evidence, contacts and timelines, but they should not coordinate political judgments or suppress criticism. Platforms should offer reliable contact points and reasoned decisions. Civil society and media retain independence to scrutinise both public authorities and companies.

Recent developments and cases

SESSION METHOD Case comparison using Sheet 6 | TIME 5 or 10 minutes

Meta and Google withdraw political ads in the EU

Meta stopped delivering political, electoral and social-issue advertising in the EU on 6 October 2025. It attributed the decision to operational complexity and legal uncertainty under Regulation (EU) 2024/900 while leaving organic political discussion available. Google's EU policy from September 2025 restricts political advertising as defined by the Regulation, with limited routes for qualifying official public information. These are company policies rather than an EU ban on political speech or political advertising as such. [9–10]

Use the development to ask who gains or loses access. Large parties may rely on existing audiences, media exposure or creator networks. Smaller contestants and civil society may lose a relatively affordable route to the public. At the same time, withdrawal can reduce formally labelled ads and public repository data while encouraging direct publisher sales or disguised paid influence.

The Houdini Ads research in Hungary

A December 2025 Hungarian Digital Media Observatory research brief reported that most formal political ads disappeared after the platform changes, but documented ads with political content that researchers found on Meta and Google under non-political treatment. It described misclassification,

inconsistent review, altered creatives, government or proxy advertising and AI-generated videos as enforcement challenges. Treat this as independent research evidence, not a final legal determination about each advertiser or platform. [11]

The case demonstrates why monitoring must preserve the creative, category, sponsor, delivery record and comparable versions. A platform's "zero political ads" policy still requires classification. The practical question becomes whether enforcement identifies political purpose consistently across languages, formats and actors.

DSA election risk and Romania 2024

The DSA treats election integrity as a systemic-risk question for VLOPs and VLOSEs. Its structure concerns risk assessment, mitigation, transparency, audits, data access and accountability rather than a broadcaster-style equal-time rule. The Commission's 2024 guidelines recommend election-specific measures while requiring protection of fundamental rights. [4–5]

In December 2024, following the first round of Romania's presidential election and declassified information about coordinated online promotion, the European Commission ordered TikTok to preserve relevant data and opened formal DSA proceedings concerning election risks. The Romanian Constitutional Court annulled the electoral process on 6 December. Trainers must distinguish the domestic constitutional remedy from the Commission's platform-supervision measures and must not present annulment as an ordinary consequence of online irregularities. [6–8]

YouTube changes its election-misinformation policy

On 2 June 2023, YouTube announced that it would stop removing content solely because it advanced false claims that widespread fraud, errors or glitches occurred in the 2020 and other past United States presidential elections. YouTube stated that removal could curtail political speech without meaningfully reducing violence or other real-world harm. It retained rules against voter suppression, interference with democratic processes, incitement and other harmful conduct. This was a platform-policy decision, not an application of Council of Europe law. [12]

Use the case as a counterpoint to advertising withdrawal. A platform can tighten, loosen or redesign its own rules while remaining subject to applicable law. Ask participants to test the platform's stated rationale rather than equating it with the legal proportionality test. Labelling, authoritative information, reduced recommendation and advertising restrictions may offer intermediate responses, but their effectiveness and legal basis must be assessed.

Comparative debrief

Development	Central issue	Lesson
Platform withdrawal	Service availability and policy response to regulation	Regulation may alter the advertising market and redistribute transparency risks.
Houdini Ads	Classification and policy enforcement	A ban requires reliable detection; "not found" and "non-political" categories require scrutiny.
Romania and TikTok	Systemic risk, data preservation and election remedy	Platform supervision and national electoral remedies have separate legal bases and thresholds.
YouTube 2023	Platform moderation and political speech	A private policy may permit more speech while retaining narrower rules addressing concrete electoral harm.

Transfer caution

Do not copy an EU enforcement mechanism into a non-EU context without a legal basis. Council of Europe standards can guide policy design, but institutional powers, sanctions and access to platform data must be established in applicable law.

Learning check and next steps

SESSION METHOD Individual exit task and plenary | TIME 5 or 10 minutes

Five-question check

1. Name the four regulatory layers that should remain separate in an assessment.

2. Which facts distinguish an unpaid personal political opinion from compensated political advertising?

3. What should a voter be able to learn from a meaningful transparency notice?

4. Why does absence from an ad repository not prove that no advertising occurred?

5. What evidence is needed before stating that a platform deliberately permitted evasion?

Suggested answers

1. Council of Europe standards, applicable EU law, national law and platform policy.

2. Payment or benefit, service supplied, sponsor or political actor, purpose, control and the applicable definition.

3. That it is political; sponsor and ultimate controller; linked process; financing and service information; and, where applicable, targeting, delivery and audience information.

4. Misclassification, non-detection, removal, search limitations, changing access, direct sales and paid influence outside the repository can all create gaps.

5. Preserved examples and comparable enforcement records plus evidence about notice, knowledge, systems and response. Observed leakage alone establishes a gap, not intent.

Closing task

Each participant writes one change needed in their institution: a definition, data field, contact point, monitoring routine, disclosure rule, referral protocol or safeguard. Ask them to name the responsible owner and a realistic completion date.

Trainer follow-up

Collect unresolved national questions. Confirm them against primary legal sources and competent authorities after the training. Do not improvise a definitive legal answer where mandates overlap or implementing arrangements remain incomplete.

Training of trainers guidance and assessment

Module-specific facilitation

Keep four layers separate throughout: Council of Europe standards, applicable EU law, national law and platform policy. Common mistakes include calling all sponsored influence political advertising, assuming a platform ban is a legal prohibition, treating an advertisement library as complete evidence, and applying EU enforcement mechanisms outside their jurisdiction. Build the session around an advertising chain so that sponsor, payer, beneficiary, intermediary, targeting choice, platform and audience remain visible.

Audience-specific application

Regulators and data or campaign-finance authorities should map jurisdiction and referral. EMBs should identify transparency and voter-information implications. Lawyers and policymakers should test definitions and safeguards. Journalists should investigate sponsorship and explain uncertainty. Civil society and observers should preserve advertisements, compare archives and document gaps. Adjust the TTPA component according to whether EU law applies.

Assessment and evaluation

Use an initial classification of editorial, organic political, sponsored and political-advertising examples. Assess the advertising-chain map, legal-layer analysis, targeting-risk exercise, evidence-quality check and institutional response. The final platform-policy case provides the exit assessment.

Evidence of learning and trainer reflection

Participants meet the objective when they identify the relevant actors in an advertising chain, distinguish legal duties from platform choices, recognise sensitive targeting and transparency risks, and state what archive evidence cannot establish. End with one scenario in which participants must name the competent actor and lawful next step. Trainers should record any platform policy or legal provision requiring an update before the next delivery.

Audience adaptation and resources

Adaptation by audience

Audience	Emphasis and technique
Regulators and supervisory authorities	Jurisdiction map, evidence file, notice audit, interim measures and cross-authority simulation.
EMBs	Neutral voter information, official-ad exemptions, platform contact points, incident logging and referral practice.
Judges and lawyers	Definition problem, evidential record, data protection, procedural rights and proportionality hearing.
Policymakers	Responsibility-chain mapping, enforcement gaps, repository access and drafting a narrow rule with safeguards.
Journalists and media practitioners	Sponsor investigation, paid-for coverage, influencer disclosure, direct publisher sales and editorial-policy clinic.

Audience	Emphasis and technique
Civil society and observers	Repeatable monitoring, repository limitations, campaign-finance triangulation and cautious public reporting.

Mixed groups should analyse the same ad from assigned roles, then identify which facts and decisions must be shared and which judgments remain institutionally independent.

Sources and further reading

[1] Council of Europe, Recommendation CM/Rec(2022)12 on electoral communication and media coverage of election campaigns. Open source

[2] Council of Europe, Recommendation CM/Rec(2007)15 on measures concerning media coverage of election campaigns. Open source

[3] Regulation (EU) 2024/900 on the transparency and targeting of political advertising. Open source

[4] Regulation (EU) 2022/2065, Digital Services Act. Open source

[5] European Commission, Guidelines for VLOPs and VLOSEs on mitigation of systemic risks for electoral processes, 26 April 2024. Open source

[6] European Commission, retention order to TikTok concerning Romanian elections, 5 December 2024. Open source

[7] European Commission, formal proceedings against TikTok on election risks, 17 December 2024. Open source

[8] Constitutional Court of Romania, Decision No. 32 of 6 December 2024.

[9] Meta, Ending Political, Electoral and Social Issue Advertising in the EU, updated 6 October 2025. Open source

[10] Google Ads, Update to Political Content policy, September 2025. Open source

[11] Hungarian Digital Media Observatory, The Houdini Ads, 19 December 2025. Trainer source supplied with this module.

[12] YouTube, An update on our approach to US election misinformation, 2 June 2023. Open source

Module 6: Digital platforms and political advertising

Training material to be shared with participants

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REUSABLE POLITICAL ADVERTISING RECORD 29

Work from the evidence supplied. Separate Council of Europe standards, applicable EU law, national law and platform policy. State what the record establishes and what remains unknown. Do not infer a sponsor, targeting criterion, platform intent or electoral impact without evidence.

Sheet 1 Classify digital campaign communication

INDIVIDUAL AND GROUP TASK Classification | SESSION TIME 5, 10 or 15 minutes

Items

A. A candidate pays a platform to boost a campaign video from the candidate's verified account. The post carries a sponsor label.

B. A citizen posts an unpaid personal opinion supporting the candidate to her own account without campaign direction.

C. A creator receives free travel and production support from a campaign, uses the campaign's script and publishes a favourable video without disclosure.

D. A newspaper independently interviews a candidate and publishes the article under editorial responsibility. No specific payment or benefit was provided for the article.

E. A nominally independent association buys ads attacking one contestant. Its director also manages the opposing party's digital campaign, but no financial records are supplied.

F. A ministry pays to promote a neutral video explaining how voters can locate polling stations. The video uses no minister's image, party branding or campaign slogan.

G. A commercial advertiser pays for a generic shoe advertisement featuring a politician who is also its long-standing brand ambassador. The ad runs during an election.

Task

For each item select the most useful initial category: political advertisement, possible issue-based or third-party ad, sponsored creator content, editorial content, organic political expression, official voter information, commercial advertising or unresolved. Identify the additional fact needed.

Item	Initial category	Decisive fact or missing evidence	First transparency check
A			
B			
C			
D			
E			
F			
G			

Questions

1. Why are payment, political purpose and control different questions?

2. Which item could become misuse of public resources if its content or branding changed?

3. Which item requires evidence before coordination can be stated?

Sheet 2 Audit an advertising chain

GROUP TASK Transparency-notice audit | SESSION TIME 15 or 20 minutes

Fictional ad and notice

The ad says: “Protect our neighbourhoods. Tell parliament to stop the Housing Reform Bill.” It appears as sponsored content two weeks before a parliamentary vote and three months before a national election. The visible label says “Paid for by Citizens for Safe Homes”.

The linked notice states: sponsor, Citizens for Safe Homes; address, Capital City; dissemination, 4–16 May; amount for this ad, EUR 7,500–10,000; campaign total, unavailable; funding source, private; service provider, Bright Reach Agency; audience, residents interested in property and community safety; impressions, 500,000–700,000. A corporate register shows that the sponsor was formed six weeks earlier. Its sole director works for a property-development federation. No ultimate controlling entity appears in the notice.

Advertising-chain map

Element	What is disclosed	What should be verified or added
Sponsor and ultimate controller		
Payer and source of funds		
Political process and beneficiary		
Service providers and publishers		
Amount, benefits and campaign total		
Targeting and delivery		
Label and accessibility		

Questions

1. Is this necessarily an electoral advertisement, an issue-based political advertisement, both or neither under the applicable definition?

2. Which facts can the notice establish, and which require external verification?

3. Could “private” be an adequate description of the source of funds?

4. Which authority or professional role should investigate each gap?

Sheet 3 Assess targeting and regulatory layers

PAIRED AND GROUP TASK Targeting and fairness | SESSION TIME 15, 20 or 30 minutes

Scenario

A political advertising service offers a campaign the following audience plan:

- include users in three contested municipalities who are estimated to be undecided;
- include users whose browsing behaviour suggests concern about household costs;
- exclude existing supporters so the budget reaches new voters;
- create a "lookalike" audience based on a supporter list uploaded by the campaign;
- deliver different messages to renters and homeowners;
- optimise automatically for users most likely to watch the full video;
- exclude users whose profile language is Minority Language B because the campaign has no translated creative.

The provider says the audience was built from "consented first-party and platform data". No consent text, data categories, proxy assessment or delivery explanation is supplied.

Assessment

Question	Evidence available	Risk or benefit	Further evidence or safeguard
Data source and controller			
Separate explicit consent			
Special-category or proxy profiling			
Uploaded supporter list			
Inclusion and exclusion			
Message variation			
Automated optimisation or AI			
User explanation and rights			

Sheet 3 Continued

Four-layer legal map

Complete only the layer relevant to your assigned role. Do not assume an EU rule applies outside its scope.

Layer	Question for this scenario
Council of Europe standard	Which transparency, fairness, privacy and freedom-of-expression principles apply?
EU law where applicable	Which TTPA, DSA and data-protection questions require examination?
National law	What do campaign-finance, election, advertising and data rules require?
Platform or service policy	What audience categories and political ads does the service permit?

Decision questions

1. Which criteria could be legitimate and useful to a smaller campaign?

2. Which criteria create the greatest privacy or discrimination concern?

3. Does exclusion of Minority Language B violate a rule, indicate unfair strategy, or expose an accessibility gap? What facts are missing?

4. Can the monitor state that special-category data were used? Why or why not?

5. What should "why am I seeing this ad" explain to a user?

Preliminary finding

Observation: .....

Assessment and applicable layer: .....

Evidence still needed: .....

Proportionate next step: .....

Sheet 4 Investigate a repository discrepancy

GROUP INVESTIGATION Evidence and monitoring | SESSION TIME 20, 25 or 35 minutes

Fictional evidence bundle

Record 1: A platform repository search on 12 March finds an active video ad from "Future Nation Media". The platform category is "Business and finance". The video uses animated characters saying that Candidate L will "hand the country to foreign banks" and urges viewers to "stop L on election day". It has no political-ad label. The displayed expenditure range is EUR 900–1,200 and impressions are 250,000–300,000.

Record 2: A street billboard photographed on 10 March uses the same words, colour scheme and final frame. It displays the logo of "National Renewal Association".

Record 3: Future Nation Media's public page was created on 2 March. It contains no ordinary posts. Its contact email uses the domain of Bright Spark Agency. The agency also appears as supplier in Candidate M's interim campaign report, but the report does not describe this ad.

Record 4: A near-identical platform ad containing photographs of Candidates L and M was removed after four hours. The animated version remained active for three days. The platform gave no public reason for either result.

Record 5: A civil society dashboard estimates that the active ad obtained 280,000 impressions. Its method reproduces the platform repository range and does not identify unique viewers.

Task

Create an ad record. Use “observed”, “indicates”, “may” and “cannot establish” carefully.

Field	Group finding
Ad identity, content and political link	
Sponsor, controller, payer and beneficiary	
Label and repository status	
Amount, delivery and metric definitions	
Evidence indicating common production or coordination	
Alternative explanations	
Potential legal issue	
Potential platform-policy issue	

Sheet 4 Continued

Evidence ladder

Level	Defensible statement
Observation	
Classification assessment	

Level	Defensible statement
Sponsorship or coordination hypothesis	
Policy-enforcement finding	
Legal conclusion	
Electoral effect	

Questions

1. Does the record support classifying the animated ad as political? State the applicable definition or policy.
2. What connects the advertiser, association, agency and Candidate M? What remains unproven?
3. Can the group say the sponsor deliberately evaded the filter?
4. Do 250,000–300,000 impressions mean that this many voters saw the ad?
5. Which records must be preserved before contacting the platform or authority?
6. What information should be requested from the advertiser, campaign, publisher and platform?

Draft monitoring sentence

.....

.....

Method limitation

.....

Sheet 5 Select an institutional response

ROLE SIMULATION Jurisdiction and remedy | SESSION TIME 10, 15 or 20 minutes

Assigned role

Media or digital-services regulator / campaign-finance authority / EMB / data-protection authority / judge or lawyer / journalist or publisher / civil society or observer / platform

Scenario

Use the Sheet 4 evidence. Election day is in six days. The ad is no longer active but copies circulate organically. The campaign denies paying for it. The advertiser has not answered. The platform acknowledges the report and says it is reviewing the classification.

Response plan

Decision	Role response
Mandate and applicable rule or policy	

Decision	Role response
Verified evidence	
Urgency and potential harm	
Information to request	
Immediate action	
Referral or cooperation	
Safeguards and review	
Public wording	

Questions

1. Which part falls outside your role's mandate?

2. Would relabelling, disclosure, removal, expenditure attribution, investigation or another remedy address the identified problem?

3. Which less restrictive measure should be considered?

4. What notice, reasons and appeal are required?

5. What can be communicated before the investigation concludes?

Public statement in two sentences

.....

.....

Sheet 6 Compare recent developments

OPTIONAL GROUP TASK Market change and enforcement | SESSION TIME 5 or 10 minutes

Development A Platform withdrawal in the EU

Meta stopped delivering political, electoral and social-issue advertising in the EU in October 2025. Google introduced an EU restriction covering political advertising under Regulation (EU) 2024/900 from September 2025, while allowing a route for specified official public information. Organic political communication remained possible.

Questions: Why is this not an EU legal ban on political communication? Which actors may lose an affordable route to voters? Where can paid influence migrate? What transparency data may disappear?

Development B The Houdini Ads research

An independent December 2025 study in Hungary reported that most formal political ads disappeared, but researchers still found political content treated as non-political on Meta and Google. The report described altered creatives, proxy and government advertising, AI-generated video and inconsistent classifications.

Questions: What does the research directly observe? Which conclusions require platform or advertiser evidence? How would you test language and video classification in your context?

Development C Romania and TikTok 2024

Following concerns about coordinated online promotion in Romania's presidential election, the European Commission ordered TikTok to preserve data and opened DSA proceedings concerning election risks. Romania's Constitutional Court separately annulled the electoral process under domestic constitutional law.

Questions: Which measure concerns platform evidence and systemic risk? Which concerns the election result? Why must their legal bases and thresholds remain separate?

Development D YouTube changes its election-misinformation policy

In June 2023, YouTube stopped removing content solely because it advanced false claims that widespread fraud, errors or glitches occurred in the 2020 and other past United States presidential elections. The platform said removal could curtail political speech without meaningfully reducing violence or other real-world harm. It retained rules against voter suppression, interference with democratic processes, incitement and other harmful conduct.

Questions: What free-expression argument did the platform make? Which risks arise when demonstrably false election claims remain available and may be recommended? Could labelling, authoritative information, reduced recommendation or advertising restrictions provide a less restrictive response than removal? Which parts of the decision are platform policy rather than a legal finding?

Transfer task

Lesson that transfers	Country-specific condition	Action for our institution

Reusable political advertising record

PRACTICE FORM One record for each ad version and observation date

Field	Entry
Record ID, collector, date, time zone	
Platform, publisher, ad ID and URL	
Account or page and verification status	
Creative, text, audio, language and call to action	
Political actor, issue, election or process	
Reason for classification and applicable definition	
Visible label and transparency-notice link	
Sponsor and ultimate controller	
Payer, funding source and service providers	
Beneficiary and evidence of coordination	
Start, end and active status	
Expenditure or value, currency and range	
Impressions, reach, frequency and metric definitions	

Field	Entry
Geography and audience information	
Targeting criteria, exclusions and data categories	
Automated optimisation or AI information	
Repository category and search method	
National legal issue and competent authority	
EU-law issue where applicable	
Platform-policy issue	
Preserved evidence and chain of custody	
Missing data and alternative explanation	
Action, referral, deadline and status	

Reporting rule

State observations first, assessments with their basis and confidence second, and legal findings only where the competent process supports them. Record the limits of repository access and never equate impressions with unique voters or electoral effect.

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 6
DIGITAL PLATFORMS AND POLITICAL ADVERTISING

Purpose and learning outcomes

- Explain how platforms influence electoral visibility
- Distinguish political advertising from unpaid expression and editorial content
- Separate Council of Europe standards, EU law, national law and platform policy
- Assess sponsorship, targeting, delivery and repository evidence
- Select a proportionate response within the responsible actor's mandate

90, 120 AND 180 MINUTE ROUTES

The platform information environment

PAID DELIVERY	Purchased distribution and audience selection
RECOMMENDATION	Ranking in feeds, search and suggested content
ORGANIC NETWORKS	Contestants, creators, media and proxy pages
MODERATION	Content and behaviour rules, notice and remedy
DATA AND MEASUREMENT	Repositories, researcher access and audit evidence

One message can travel through several systems

CANDIDATE POST | SUPPORTER SHARES | PAID CREATOR | BOOSTED AD

Each stage raises a different question about payment, control, transparency and responsibility.

Recommendation may expand visibility without a separate purchase.

Working categories

POLITICAL AD	Paid placement by or for a political actor
ISSUE AD	Paid message designed to influence a political process
THIRD PARTY	Paid communication outside the contestant
CREATOR CONTENT	Payment, benefits or direction may create sponsorship
PAID-FOR COVERAGE	Editorial-looking material produced for benefit
VOTER INFORMATION	Neutral procedural information from a competent body

CLASSIFICATION | SHEET 1 | 10–15 MINUTES

Payment, purpose and control

PAYMENT OR BENEFIT	POLITICAL PURPOSE	CONTROL OR DIRECTION
Was remuneration or another advantage provided?	**Does the message seek to influence an election or political process?**	**Who selected the message, audience and publication conditions?**

These questions overlap, but they are not interchangeable.

The advertising chain

SPONSOR	Identity and political relationship
ULTIMATE CONTROLLER	Entity behind a nominal purchaser
PAYER AND FUNDS	Invoice, source and benefit in kind
SERVICE PROVIDERS	Agency, creator, publisher and platform
TARGETING AND DELIVERY	Criteria, exclusions, consent and metrics
BENEFICIARY	Contestant or cause assisted and coordination evidence

Paid, owned and earned visibility

PAID	OWNED	EARNED
Ads, boosts, sponsored search and compensated creators	Campaign accounts, websites and mailing lists	Journalism and voluntary sharing

The boundaries blur when campaigns supply scripts, benefits or promotional material.

Four regulatory layers

COUNCIL OF EUROPE	Human rights, transparency and fair treatment
EU LAW WHERE APPLICABLE	TTPA, DSA and data protection
NATIONAL LAW	Election, campaign finance, advertising and media rules
PLATFORM POLICY	Contractual service rules and enforcement

Council of Europe framework

- CM/Rec(2022)12 complements CM/Rec(2007)15 for a convergent environment
- Political advertising should be readily recognisable
- Sponsorship, financing and distribution criteria require transparency
- Personal data need safeguards against abusive use
- Platform restrictions should be transparent, non-discriminatory and use the least restrictive effective means

EU instruments answer different questions

TTPA	Political-ad labels, notices, sponsor information and targeting rules
DSA	Ad repositories, recommender transparency and systemic election risks
DATA PROTECTION	Lawfulness, consent, profiling and data-subject rights
NATIONAL ELECTION LAW	Permission, periods, spending, third parties and remedies

TTPA transparency map for EU contexts

RECOGNISE	Clear statement that the advertisement is political
IDENTIFY	Sponsor and any ultimate controller
CONNECT	Related election, referendum or legislative process
DISCLOSE	Dissemination, amounts, funding and service providers
EXPLAIN	Targeting or delivery techniques where applicable

Targeting and fairness

DATA SOURCE	Collected, purchased, inferred or uploaded?
CONSENT AND CHOICE	Separate, explicit and withdrawable?
CHARACTERISTICS	Sensitive categories or proxy profiling?
INCLUSION AND EXCLUSION	Who receives or misses the message?
MESSAGE VARIATION	Do audiences receive inconsistent promises?
OPTIMISATION	What did the sponsor choose and the service optimise?

Paid targeting and organic recommendation

PAID TARGETING

Selects or optimises the audience for paid delivery

RECOMMENDER SYSTEM

Ranks organic and paid content using service design and user signals

The systems interact, but the evidence and legal questions differ.

Monitoring begins with the question

- Labels and sponsor transparency
- Campaign expenditure and third-party support
- Targeting and unequal access
- Misuse of state resources
- Policy evasion or misclassification
- Content and audience of paid messages

No single repository answers all of these questions.

Minimum advertising record

IDENTIFICATION	Platform, ad ID, URL, time and collector
CONTENT	Creative, language, call to action and versions
POLITICAL LINK	Actor, beneficiary, election and classification basis
TRANSPARENCY	Label, sponsor, controller, payer and missing fields
DELIVERY	Dates, status, ranges, geography and metric definitions
EVIDENCE	Capture, repository link, chain of custody and limitation

Repository evidence has limits

CAN SHOW	CANNOT ESTABLISH ALONE
Creative content and dates	Accuracy of sponsor declarations
Declared sponsor and label	Rejected or misclassified ads
Spending or impression ranges	Unique voters reached
Broad delivery information	Intent, coordination or electoral effect

Quality control

- Keep the original capture and record time zone, account state and collection method
- Use a written codebook for relevance, sponsor type, funding, targeting and suspected evasion
- Double-code a sample and resolve disagreements
- Keep platform ranges as ranges and document unavailable fields
- Protect personal data and avoid building political profiles of individual voters

Repository discrepancy scenario

An active video urges voters to "stop Candidate L on election day" but appears in a business category without a political-ad label.

- A billboard uses the same words, colours and final frame
- The advertiser's email uses an agency domain also listed by Candidate M
- A near-identical ad was removed while the animated version remained active
- The repository reports 250,000–300,000 impressions

EVIDENCE EXERCISE | SHEET 4 | 20–35 MINUTES

Evidence ladder for the ad record

OBSERVATION	Exact content, category, label and repository data
CLASSIFICATION	Reasoned assessment under a stated definition
COORDINATION HYPOTHESIS	Supported connections and plausible alternatives
POLICY FINDING	Documented inconsistency with a service rule
LEGAL CONCLUSION	Only through the competent legal process
ELECTORAL EFFECT	Requires evidence beyond impressions

Institutional response ladder

1. Preserve the ad and collection conditions
2. Verify classification, sponsor, funding and targeting
3. Assess urgency, scale and election phase
4. Seek clarification or correction where appropriate
5. Refer a concise evidential record to the competent body
6. Use coercive measures only where authorised and necessary
7. Publish proportionate findings and update the record

One case, different professional tasks

REGULATORS	Jurisdiction, evidence threshold and remedy	**EMBs**	Accurate voter information and referral
LAWYERS / JUDGES	Definition, evidence and proportionality	**POLICYMAKERS**	Close gaps without vague duties
JOURNALISTS	Verify sponsorship and expose evasion	**CIVIL SOCIETY / OBSERVERS**	Monitor consistently and report limitations

OPTIONAL OR EXTENDED

Platform withdrawal in the EU

OPTIONAL OR EXTENDED

META

Stopped political, electoral and social-issue advertising in the EU in October 2025

GOOGLE

Restricted political advertising covered by Regulation (EU) 2024/900 from September 2025

Company policies changed service availability. EU law did not ban political communication.

Houdini Ads research

OPTIONAL OR EXTENDED

Formal political ads largely disappeared, but researchers still found political content treated as non-political on Meta and Google.

- Altered creatives and inconsistent classifications
- Government or proxy advertising
- AI-generated video
- Language and format challenges

Romania and TikTok 2024

OPTIONAL OR EXTENDED

PLATFORM SUPERVISION

The European Commission ordered data preservation and opened DSA proceedings on election risks

ELECTION REMEDY

The Constitutional Court separately annulled the electoral process under domestic constitutional law

The legal bases and thresholds must remain separate.

YouTube 2023 policy change

OPTIONAL OR EXTENDED

YouTube stopped removing content solely because it advanced certain false claims about past United States presidential elections.

PLATFORM RATIONALE	REMAINING SAFEGUARDS
Removal could curtail political speech without meaningfully reducing real-world harm	Rules remained for voter suppression, process interference and incitement

Learning check

- Name the four regulatory layers
- What distinguishes unpaid opinion from compensated political advertising?
- What should a meaningful transparency notice reveal?
- Why does absence from a repository not prove that no advertising occurred?
- What evidence is needed before alleging deliberate evasion?

INDIVIDUAL EXIT TASK | 5–10 MINUTES

Key messages

- Platforms shape visibility through advertising, recommendation, moderation and data practices
- Political advertising must be identified through evidence and the applicable definition
- Meaningful transparency follows the full advertising chain
- Targeting may expand access while creating privacy, exclusion and fairness risks
- Repositories support scrutiny but contain gaps and changing definitions
- Responses require clear authority, due process and proportionality

END OF MODULE 6