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Reflection paper on local and regional elections in times of COVID-19 pandemic

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www.coe.int/congress
Tel ► +33 (0)3 8841 2110
Fax ► +33 (0)3 9021 5580
congress.bureau@coe.int
www.coe.int
CONGRESS OF LOCAL AND REGIONAL AUTHORITIES
CONGRÈS DES POUVOIRS LOCAUX ET RÉGIONAUX
F-67075 STRASBOURG cedex

A. Introduction

1. In times of extreme crisis such as the current COVID-19 pandemic, holding elections and referendums has become a challenge to democracies across Europe at different levels of governance, including the local and regional.[2] On the one hand, elections are a cornerstone of democracy and need to be held regularly within legal and constitutional timeframes. On the other hand, elections entail a high risk of spreading the disease to both election administration staff and voters who represent large proportions of the population. The holding of elections may thus be contrary to the informed advice of health experts to avoid gatherings of people in order to limit transmission of the virus. As a result, elections in some European countries have been postponed while in other countries they have been held despite the pandemic, sometimes using alternative voting methods in order to limit the spread of the disease.[3]

2. From the Congress' perspective, the current situation raises important questions with regard to the international standards for democratic elections at local and regional level. During the current coronavirus pandemic, both aspects of standards for democratic elections are concerned. The right to political participation on the one hand and the freedoms of expression and assembly along with freedom of movement on the other. While the former is critical for the enfranchisement of citizens, the latter create basic preconditions for truly democratic elections, including a free and inclusive electoral campaign. When citizens cannot assemble and move freely, effective realisation of these rights is at stake.

3. At the same time, local and regional authorities are expected to fulfil their role in managing their communities in times of crisis while protecting the ones who are most vulnerable. As noted by the Congress President "(…) *because of their particular responsibilities and their proximity to citizens, the local and regional authorities are in the front line in responding to this major crisis. Thus, this crisis not only puts at risk human lives but, at the same time, also affects the functioning of our societies and democracies. In face of this crisis, Europe must act collectively, in a spirit of solidarity which must be expressed at all levels: European, national, local and regional, as well as at the level of citizens in their respective communities*."[4]

4. While Congress does not take a firm position on whether local and regional elections should be held in times of coronavirus and under what circumstances, certain guidelines can be drawn from international standards and recent practices of Council of Europe member States. In general, states have to ensure that local self-governance continues to function in line with the European Charter of Local Self-Government, also during extraordinary times such as the current COVID-19 pandemic. This paper provides an overview of commendable practices with regards to holding in-person and remote electoral activities at local and regional levels in times of coronavirus.

B. Local and regional elections in times of coronavirus

5. Since the coronavirus outbreak, a number of elections in Council of Europe member States scheduled for early spring were held despite the magnitude of the pandemic in both March and April. Others decided to postpone the elections or to use alternative voting methods. Whereas Italy suspended a referendum on constitutional reform amid a steep rise of coronavirus cases, France held the first round of local elections on 15 March. The turnout was low and there were allegations that the virus was spread among voters and poll workers. The second round of local elections in France has been postponed until 21 June (originally scheduled for 22 March) due to the rapid spread of the virus.[5]

6. The German federal state of Bavaria held two rounds of local elections, the first by both postal and in-person voting, whereas the second only through all-postal vote (first round 16 March and second round 29 March 2020).[6] In Geneva, Switzerland, the second-round of municipal elections was conducted on 4 April by postal voting only. During the critical phase of coronavirus outbreak, partial (in-person)

2 https://rm.coe.int/sg-inf-2020-11-respecting-democracy-rule-of-law-and-human-rights-in-th/16809e1f40
3 https://www.idea.int/news-media/multimedia-reports/global-overview-covid-19-impact-elections
4 https://www.coe.int/en/web/congress/-/covid-19-congress-president-calls-for-urgent-coordinated-action-by-all-levels-of-government
5 https://www.euronews.com/2020/03/15/france-voters-take-to-the-polls-amid-coronavirus-fears; See below in the Appendix.
6 https://www.merkur.de/politik/stichwahl-kommunalwahl-2020-bayern-termin-ablauf-briefwahl-losentscheid-zr-13442878.html; See below in the Appendix.

local and/or regional elections were also organised in Moldova on 15 March (Hâncești), Poland on 22 March (six by-elections on local level) and Switzerland on 29 March (Luzern).[7]

7. The Government of Serbia, instead, decided to postpone the parliamentary and local elections originally scheduled for 26 April. Likewise, upcoming local and regional elections and referendums have been postponed in Austria (Vorarlberg and Styria), United Kingdom (London Mayor, London Assembly, local elections in England and Wales), Romania, Germany (Hessen and Saxony), Spain (Euskadi and Galicia), Russia (numerous regional and local elections), Latvia (city council in Riga), Switzerland (Neuchâtel, Ticino, and Luzern), Gibraltar (referendum on abortion), Isle of Man and Italy (numerous regional and local elections).[8] As for national elections, a particularly interesting case is Poland where presidential elections were scheduled for 10 May but were eventually postponed.[9]

8. Health and safety guidance for protecting election staff and voters may however prove costly and its implementation may be consuming in terms of time and human resources, especially if elections are to be held in a short timeframe as prescribed by constitutional or legal frameworks, or due to political pressure. Therefore, there needs to be coordination between different state agencies, at different levels of government, on the one hand, and the election administration on the other, in assessing the feasibility of implementing such measures while upholding the international standards for democratic elections.[10]

9. Decisions that are taken in coordination by governments, local and regional authorities, health authorities, election administration bodies and other involved agencies must balance the risks and drawbacks of postponing elections or holding elections despite the extreme crisis situation.[11] The impacts that the postponing of an election has on the constitutional and democratic standards need to be balanced against the risk of holding an election through voting in-person in a polling station with the potential health implications of bringing people together in a narrow space.[12]

10. Times of extreme crisis such as the current coronavirus pandemic require careful consideration of both the benefits and drawbacks of different forms of voting, including all health risks of in-person elections as well as the challenges of remote voting methods entailing certain risks of compromising standards for democratic elections. In addition, new and unpiloted logistical arrangements may prove challenging from the budgetary point of view as well as from the legal, organisational and procedural perspectives and may be logistically unfeasible in a short timeframe. Lastly, no matter what solution is adopted, holding or postponing elections in times of coronavirus has implications on the legitimacy of the vote.

C. Postponing elections: legal considerations

11. As described above, the current situation of pandemic exposed many governments to a decision to either hold or postpone elections scheduled for this year. These decisions are important and necessary, yet they are often very complicated, considering that regular and periodic elections are a fundamental right and crucial to facilitating peaceful and democratic transfers of power.[13] Moreover, deadlines for holding these elections are often embedded in a legal or constitutional framework at state or regional level.

12. At the same time, international human rights law allows, in times of emergencies and under strict limitations, for the derogation of rights and freedoms that are necessary for democratic elections, notably the right to vote and stand for election and the freedoms of movement, assembly and expression.[14] Any derogation of these principles must be **proportionate**: the measures taken must be commensurate to the problem; **non-discriminatory**: the measures must not discriminate on the basis of individual or

7 https://www.idea.int/news-media/multimedia-reports/global-overview-covid-19-impact-elections#ELECTIONS%20HELD%20AMID%20COVID-19
8 https://www.idea.int/news-media/multimedia-reports/global-overview-covid-19-impact-elections#POSTPONED%20ELECTIONS%20DUE%20TO%20COVID-19; For latest update see https://www.coe.int/en/web/electoral-assistance/elecdata-covid-impact
9 See below in the Appendix.
10 https://www.idea.int/sites/default/files/publications/elections-and-covid-19.pdf and https://www.ifes.org/sites/default/files/guidelines_and_recommendations_for_electoral_activities_during_the_covid-19_pandemic_march_2020.pdf
11 https://www.idea.int/news-media/news/democracy-experts-should-seek-central-role-shaping-post-coronavirus-order
12 Ibid.
13 Article 21(3) of the Universal Declaration of Human Rights.
14 Most importantly, ECHR Article 15 as well as ICCPR Article 4 and ICCPR GC 29.

community characteristics; **temporary**: the measure must be specifically limited in duration and make provisions for an end point; and **limited in geographic and material scope**: the measures must be appropriately narrow and targeted to the problem, in both geographic scope and significance.[15]

13. On this note, in a statement of 7 April 2020, the Council of Europe Secretary General affirmed that "*any derogation* (of the European Convention of Human Rights) *must have a clear basis in domestic law in order to protect against arbitrariness and must be strictly necessary to fighting against the public emergency. States must bear in mind that any measures taken should seek to protect the democratic order from the threats to it, and every effort should be made to safeguard the values of a democratic society, such as pluralism, tolerance and broadmindedness* (…) *derogations can never justify any action that goes against the paramount Convention requirements of lawfulness and proportionality*."[16]

14. With regards to the constitutional significance of an election, elections are held at supranational, national and subnational, i.e. local/regional levels. Some elections are constitutionally or politically critical, serving as a mechanism in a sequence of events, such as a step in a peace process, legal reform process or in drawing up the state or municipal budget on the national or local level. For local and regional elections, there may also be a regional disparity within the country: in certain areas of a country the virus may have spread to a lesser degree than in others, therefore they can be less likely to experience the impact of coronavirus and allow for the holding of local or regional elections, if the law permits.

15. A lot depends on the domestic constitutional and legal framework, too. While many constitutions provide for the postponement of elections during emergencies, some frameworks may provide for continuity of government, local/regional council or mayor beyond a mandated term. In other cases, the constitution may remain silent on this matter. Alternatively, postponing elections may be decoupled from the declaration of a state of emergency, making it possible to declare a state of emergency without postponing elections, or to postpone elections without necessarily declaring a state of emergency. In some countries, constitutional or legal amendments allowing postponement of elections can be adopted during emergencies. However, some constitutions forbid the passing of constitutional amendments during emergencies for concerns related to the lack of quality of hasty amendments adopted without proper public debate and their potentially harmful effects to democracy.[17]

16. The responsibility for making these difficult legal and operational decisions varies between countries and can become fraught with problems, especially where the legal basis for postponement is not clearly defined. In some countries the election management body is mandated with setting the date of the election within the bounds of constitutional deadlines while in other countries it rests with the executive, or it is set in law. Wherever the decision-making authority rests, careful consultation is required, notably between the different tiers of government, in particular involving the local and regional authorities when it comes to elections on local and regional level. If both electoral deadlines and emergency powers are provided for in the constitution without any specific guidance on how they interact, additional constitutional interpretation will likely be needed by the courts.

D. Measures to mitigate risks of holding in-person elections

17. The responsible authorities can make the informed decision based on the opinion of health experts to hold in-person elections. This depends on each country's public health situation, the level of spread of the disease and other contextual factors. Holding elections in times of a pandemic is not easy but should not be considered as impossible without implementing adequate measures to protect both the health of voters and the electoral staff as well as democratic rights. Different measures need to be taken depending on the concrete electoral activities underway.[18] Voters should be offered voting methods that

15 https://www.ifes.org/news/emergency-powers-and-covid-19-pandemic-protecting-democratic-guardrails; See also CDL-PI(2020)003-e Compilation of Venice Commission Opinions and Reports on States of Emergency, https://www.venice.coe.int/webforms/documents/?pdf=CDL-PI(2020)003-e

16 Proportionality means that the interference must be no more than is absolutely necessary to achieve one of the aims in the European Convention. By other words, the impact of the restriction on the individual must not be excessive in relation to the legitimate interests pursued; https://rm.coe.int/sg-inf-2020-11-respecting-democracy-rule-of-law-and-human-rights-in-th/16809e1f40

17 https://www.ifes.org/news/legal-quagmire-postponing-or-modifying-elections

18 For comparison, see a list of mitigating measures taken in different countries during elections amid the COVID-19 pandemic at: https://www.ifes.org/sites/default/files/elections_held_and_mitigating_measures_taken_during_covid-19.pdf

minimise direct contact with other people, e.g. early voting or extended election day, and reduce crowding at polling stations.

18. Adequate measures to mitigate risks must be implemented in electoral activities, which entail crowding and human-to-human contact that could constitute a high risk of transmission of respiratory droplets among the crowd. This includes different phases of the electoral process including campaign rallies, voter registration procedures, training of electoral staff and observers, administrative preparation of elections, polling procedures on and around the election day and electoral dispute resolution.[19] In general, where crowding can occur during the electoral process, social distancing must be enforced between voters as well as electoral staff and other agents involved in the process.[20]

19. It is important to note, that although many aspects of the transmission of the virus have been clarified, experts continue to make new findings on what distance is safe to prevent transmission via respiratory droplets. According to the latest scientific knowledge, the duration of which the virus can remain airborne depends on whether persons are outside or in the room and for the latter different conditions for transmission of the virus exist in rooms with open or closed windows. There is however agreement among experts that the virus does not remain airborne for hours. Concerning social distancing, there are clear indications that human-to-human distance between one or two meters is sufficient to minimise the risk of transmission.[21] Therefore, only the most necessary electoral activities, i.e. voting, should be conducted in person and where in-person activities are unnecessary or can be minimised, remote solutions should be preferred to a maximal extent.

20. The social-distancing measures particularly affect electoral campaign. On this matter, the Council of Europe Secretary General noted that "*during the state of emergency, holding elections and referendums may be problematic, since the possibility of campaigning is extremely limited in times of crisis*."[22] Be it during the state of emergency or simply in times of the spread of coronavirus, political rallies and other forms of campaigning clearly represent a challenge. In order to minimise risks, in-person activities should be reduced and where not possible, large crowds of people should be avoided. Required social distancing between individuals should be enforced. Political campaign activities should be preferably carried out remotely, even if there is in-person voting on election day. Candidates and political parties might suspend in-person rallies and conduct campaigns solely online through social media platforms and via traditional media.

21. However, election campaigns under such conditions may result in an unlevel playing field. Therefore, it is essential that equality of opportunity of parties and candidates be guaranteed during the election campaign in line with international standards, including recommendations of the Venice Commission.[23] In particular, this entails a neutral attitude by state authorities with regards to coverage by the private and public media.[24] Additionally, it should be ensured that there is a minimum access to privately owned audio-visual media, as well as social media, with regards to the election campaign and to advertising, for all participants in elections.[25]

22. In-person voter registration can pose further problems. This may be the case especially in countries where active voter registration is in place or where voters' physical presence is necessary for certain registration procedures. This can be the verification or correction of data entries in voter registers, which can be organised in such a way as to avoid the crowding of people at registration offices, e.g. by means of scheduled timeslots for concerned voters during the pre-election period. Online or mail-in voter registration should be made possible and encouraged, provided that international standards are ensured.

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19 See more on safeguarding health and elections at:
https://www.ifes.org/sites/default/files/ifes_covid19_briefing_series_safeguarding_health_and_elections_may_2020.pdf
20 For comparison, see guidelines composed by the International Foundation for Electoral Systems (IFES) and the Institute for Democratic and Electoral Assistance (IDEA),
https://www.ifes.org/sites/default/files/guidelines_and_recommendations_for_electoral_activities_during_the_covid-19_pandemic_march_2020.pdf and https://www.idea.int/sites/default/files/publications/elections-and-covid-19.pdf
21 https://www.worldometers.info/coronavirus/transmission/
22 p 4, https://rm.coe.int/sg-inf-2020-11-respecting-democracy-rule-of-law-and-human-rights-in-th/16809e1f40
23 Venice Commission, Code of Good Practice in Electoral Matters, I.2.3.
24 Ibid, I.3.1.
25 Ibid, I.2.3.c; See also SG's comments on the derogation on freedom of expression and information, media freedom, access to official information, p 6, https://rm.coe.int/sg-inf-2020-11-respecting-democracy-rule-of-law-and-human-rights-in-th/16809e1f40

23. As for the election day, all venues where electoral activities take place and where crowding cannot be easily avoided, most importantly polling stations, need to be adjusted to allow sufficient space (if possible, more than 1,5 meter) between voters, electoral staff and other agents during all procedures. Temperature checks could be organised to identify and separate possibly infected voters who should be allowed to voter in specially designated polling stations. In general, the layout inside polling stations and other facilities should minimise the contact between people (both voters and polling staff), using for example curtains, doorknobs, plexiglass panels etc. Appropriate hand-washing stations need to be provided in sufficient numbers and gloves and face masks should be offered freely and their wearing should be mandatory for both voters and poll workers as well as for other persons present during the process (e.g. election observers).[26]

24. The presence of a large number of persons assembled in the same room should be avoided by organised entries and exits of a limited number of people. Voters planning to vote in person on election day should be encouraged to arrive at off-peak times. Likewise, early voting should be encouraged, if allowed by law, to reduce crowds throughout the day, or elections can be held along several days to spread out the turnout.[27]

25. All spaces need to be equipped by posters promoting hand washing, social distancing as well as respiratory hygiene/cough etiquette. People should be encouraged to wash their hands regularly with soap and water for at least 20 seconds or use an alcohol-based hand sanitiser. People also need to be reminded to avoid touching their faces and avoid all unnecessary handling of electoral materials (e.g. voter ID). Surfaces and objects touched by people frequently need to be regularly cleaned by alcohol-based cleaners, ideally after each voter.[28]

26. Electoral staff and especially poll workers employed in polling stations on election day may not be as willing to serve due to health risks, which can make running an election even more challenging.[29] Aside from applying all relevant abovementioned measures also to contacts among electoral staff and between electoral staff and voters, it should be considered to move polling stations to larger facilities where human-to-human contact can be more easily controlled and minimised. Reducing the number of polling stations can also be considered, however ensuring accessibility to vote to a maximum number of voters must be prioritised.[30] The same counts for election observers, both domestic and international, whose presence is guaranteed by international standards and is crucial for public trust in elections.

27. As it still remains discussed what the real risks of transmission via objects and other electoral materials are, or which are likely to carry infection and how long the virus can survive on surfaces, the highest protection standards need to be applied while handling electoral materials by voters and polling staff on election day. As regards to trainings of electoral staff and election observers, virtual trainings could be developed and marketed as an alternative to in-person activities. Election observation activities must be allowed to a maximal extent and in line with international standards, while upholding all the abovementioned measures mitigating the risk of transmission.[31] It should be encouraged that electoral complaints regarding the electoral process be filed by post or online where possible and where such practice would not undermine democratic principles.

28. Lastly, vulnerable groups should be allowed and encouraged to vote through alternative voting methods even if the general population votes in-person. In particular, voters in independent or assisted living facilities, retirement communities, and care centres should be provided postal ballots. Polling stations should be relocated from areas close to independent or assisted living facilities, retirement communities, and care centres to decrease the risk of transmission. Alternatively, separate polling

26 https://www.ifes.org/sites/default/files/guidelines_and_recommendations_for_electoral_activities_during_the_covid-19_pandemic_march_2020.pdf
27 For instance see the example of elections held in South Korea, https://www.idea.int/sites/default/files/publications/managing-elections-during-pandemic-republic-korea-crucial-test.pdf
28 Ibid.
29 Note that in the 2020 Wisconsin Democratic primary elections, an acute shortage of poll workers meant that the city of Milwaukee was only able to provide five instead of its usual 180 polling stations which lead to overcrowding on election day, https://nimd.org/elections-in-the-time-of-covid-19/?fbclid=IwAR1DriAUR27Ry7gccUl9dznrdgTimdFqi-trb6knqGOJreDnjUwYZW1GWpc
30 https://www.ifes.org/sites/default/files/guidelines_and_recommendations_for_electoral_activities_during_the_covid-19_pandemic_march_2020.pdf
31 OSCE Copenhagen Document, para I.8.

stations only for vulnerable groups could be established.[32] Vulnerable populations should be also released from all poll worker service.[33]

E. Alternatives to holding in-person elections

29. Alternative voting methods that allow voters to cast their ballots either remotely or by means of involving other persons can be used to reduce or mitigate the health risk constituted by voting in person in times of coronavirus. However, in the context of some countries, political distrust may undermine confidence in any alternatives, including remote voting, while possible threats to the integrity of elections can undermine the feasibility of alternative voting options. Despite clear risks and challenges of implementing alternative voting methods, their use has been discussed among experts extensively and is now acceptable under conditions defined by international standards. In any case, it is essential that voters always have the possibility of voting in a polling station if they prefer.

30. As noted by the Venice Commission, remote voting arrangements existing in Council of Europe member States are designed to complement, not replace, in-person voting.[34] Alternative voting methods include sending the vote by post (postal voting), casting the vote online through a computer or mobile phone application (electronic voting, e-voting, Internet voting, online voting), or alternatively by means of voting by proxy or voting by mobile ballot.

31. The use of alternative voting methods can be beneficial especially when elections are held in an area of a country with a greater number of people with an increased health risk, such as the elderly. Remote voting may be an effective option to encourage their participation and maintain voter turnout, while limiting contagion and reducing the risks to citizens' and poll workers' health.

32. Careful consideration must be given to the electoral legal framework regulating elections. In many cases, election laws set out specific election processes and sometimes also specific timelines. Legal amendments may therefore be required to allow for any operational modifications of electoral provisions. This is the case not only for polling but may also impact other parts of the process such as voter registration, campaigning and counting. Where these details are set out in the administrative regulatory framework, it will be easier for the election administration to make changes quickly.[35]

33. However, this does not eliminate the need for careful consideration and consultation. A crucial consideration for modifying election processes in the law is the need to preserve legal certainty. Elections are by nature rules-based exercises and changing their parameters even months prior to Election Day and without consent of all actors including wider public can be damaging for voters' confidence in the process. In general terms, the Venice Commission affirms that stability of the law is crucial to credibility of the electoral process. Therefore, it is recommended that no fundamental elements of electoral law be changed, in particular the electoral system proper, membership of electoral commissions and the drawing of constituency boundaries, less than one year before an election. Should changes be made, these ought to be written in the constitution or at a level higher than ordinary law.[36]

34. Unfortunately, a fundamental crisis situation such as COVID-19 may pose major challenges to some countries in this regard. In which case, drastic changes should be limited, and the requirement for transparency, increased training and effective procedures will be even greater.

35. From the procedural point of view, all stakeholders should be onboard, including the government, opposition and expert community. With regard to local and regional elections, territorial authorities who are the best to know the risks related to the spread of the COVID-19 disease in their respective areas are to be consulted before decisions on legal amendments regarding such elections are taken.

36. From the perspective of international standards for democratic elections, it has to be noted that alternative voting methods, most notably postal and Internet voting, are under normal circumstances not recommended as the only accessible voting method as they are largely uncontrolled and, in some

32 See also impacts of COVID 19 elections on gender equality: https://www.ifes.org/news/how-protect-gender-equality-elections-during-covid-19
33 https://www.ifes.org/sites/default/files/guidelines_and_recommendations_for_electoral_activities_during_the_covid-19_pandemic_march_2020.pdf
34 Venice Commission, Code of Good Practice in Electoral Matters, Explanatory Memorandum, para 37.
35 https://www.ifes.org/news/legal-quagmire-postponing-or-modifying-elections
36 Venice Commission, Code of Good Practice in Electoral Matters, II.2.b.

contexts, can be misused to undermine the integrity of an election.[37] In comparison, traditional in-person voting in a polling station, though it bears its own risks and shortcomings, offers more possibilities for the election administration to safeguard and for election observers to monitor the integrity of an election. In-person voting, compared to absentee/remote voting, also reasonably reduces the opportunity for irregularities, such as vote buying and coercion or family voting, while providing a better guarantee to the secrecy and integrity of an election.[38]

37. From the practical point of view, financial costs of introducing remote voting solutions are often high, notably when it comes to Internet voting, and implementation timeframes may be insufficient for adequate preparation, especially in the current situation when upcoming elections are due in a short time. Procurement and training, as well as legal frameworks may pose further problems to their introduction.[39] While methods like proxy voting and voting by mobile ballot do not entail these drawbacks, their use can only be limited, as most legal frameworks do not allow the wider public to use them, at least for practical reasons.[40]

38. Postal voting typically requires a large-scale logistical effort, from procuring reliable postal services to recruiting ballot-counting staff and requiring numerous counting officers to cooperate under close supervision. Postal voting should be allowed only where the postal service is secure, i.e. safe from interference, and reliable, in the sense that it functions properly.[41] Postal voting should not be widely encouraged if problems with the postal service are added to other difficulties inherent in this kind of voting, including the heightened risk of compromising the secrecy of the vote by e.g. family voting.[42] In addition, there is a risk of higher number of spoilt ballots as postal voting requires strict following of voting instructions. Such an exercise may also be challenging to conduct safely during the coronavirus pandemic as it entails the risks of human-to-human contact and possibly the risk of transmission via electoral materials (see above). On the other hand, the risk is significantly lower compared to in-person elections in polling stations.

39. According to the Venice Commission, the right to vote by postal ballots may be confined to people who are in hospital or imprisoned or to persons with reduced mobility or to electors residing abroad. Fraud and intimidation must not be possible.[43] Should existing conditions in a Council of Europe country provide a sufficient framework for holding elections through postal ballot in line with international standards for democratic elections, postal voting can be, in these extraordinary circumstances, considered as an alternative to all-in-person voting in times of coronavirus. It is vital, however, that this option must be allowed by domestic jurisdiction and traditional voting methods must be accessible for voters who decide not to vote by postal ballot.[44]

40. Further, the current coronavirus pandemic increased interest in Internet voting through a computer or mobile phone application. However, as the demand for moving elections online increases, responsible authorities should take into account important challenges when considering the use of Internet voting. While new technologies can promise new opportunities to deliver more efficient, accurate and potentially more transparent elections, they also bring new risks. As the International Foundation for Electoral Systems noted, Internet voting needs to be evaluated according to five parameters: cost, participation, efficiency, trust and security.[45]

37 Ibid, I.3.2.i-iv.
38 https://www.idea.int/sites/default/files/publications/elections-and-covid-19.pdf
39 Ibid.
40 See below; C.f. proxy voting in the UK and Netherlands, for example.
41 Note that postal voting has long been in use in several established democracies in western Europe, e.g., Germany, Ireland, Spain, Switzerland and, for voters abroad, e.g. in the Netherlands, Norway, and Sweden (CDL-AD(2004)012, Chapter III). It was also used, for example, in Bosnia and Herzegovina and Kosovo in order to ensure maximum inclusiveness of the election process (CG/BUR (11) 74).
42 Venice Commission, Code of Good Practice in Electoral Matters, Explanatory Memorandum, para 39.
43 Venice Commission, Code of Good Practice in Electoral Matters, I.3.2.i-iv.
44 See more on holding postal voting elections under https://www.idea.int/news-media/news/switching-all-postal-voting-times-public-health-crises-lessons-poland
45 Immature and poorly planned technology operated incorrectly or creating new opportunities to interfere can undermine public confidence in elections. Initial spending on introduction of e-voting is likely to exceed common electoral budget as investments into strong identification infrastructure are expensive if not already in place. Evidence in some states shows that Internet voting does not always boost voter turnout as it may be more convenient for already convinced voters but tend not to attract new voters. Internet voting improves the speed of casting ballots and facilitates the efficiency of voting. It can be also exclusive for certain groups of voters, e.g. elderly, rural population and less educated. Protection of personal data may be also problematic. https://www.ifes.org/sites/default/files/considerations_on_internet_voting_an_overview_for_electoral_decision-makers.pdf

41. According to the Venice Commission, electronic voting can be introduced only if it is safe and reliable and the system used must be transparent, while respecting secret suffrage.[46] Detailed recommendations and guidelines on standards for e-voting are provided in the Recommendation CM/Rec(2017)5 of the Committee of Ministers to member States.[47] However, due to the high levels of planning, preparation and testing needed, it is unlikely that countries that do not already have the requisite systems in place would be able to or should even attempt to launch Internet voting as an immediate response to the coronavirus crisis. Nonetheless, it has to be noted that in some Council of Europe member States, e-voting has been conducted or tested in the past on local and regional levels.[48]

42. Apart from the two abovementioned remote voting options, there are also absentee voting possibilities which are traditionally in use, though only for a limited number of voters. Proxy voting is a form of voting whereby a member of a decision-making body may delegate his or her voting power to a representative, to enable a vote in absence. Proxy voting within a clear legal framework could offer a further option for vulnerable groups to participate in an election without being required to visit a polling station. However, according to the Venice Commission, proxy voting is permissible only if very strict rules apply in order to prevent fraud. The number of proxies a single voter may hold must be limited and widespread use is unacceptable.[49]

43. Mobile ballot boxes, under normal circumstances, are used for allowing a very limited number of voters to vote, as they cannot come to the polling station due to their impaired mobility. In general, a widespread use of mobile ballot boxes is undesirable because of the potentially serious risk of fraud. If mobile ballot boxes are nonetheless used, strict conditions should be imposed to prevent fraud, including the attendance of several members of the polling station election commission representing different political groupings.[50] In times of coronavirus, the use of mobile ballot boxes could be expanded to a wider group of vulnerable voters, e.g. voters infected with COVID-19. In any case, the highest standards of protection must be applied when electoral staff delivers the mobile ballot box to vulnerable voters and during the process of casting the ballot.

44. If authorities decide to hold elections by alternative voting methods in order to avoid or minimise the human-to-human contact before, during and after election day, voters must be informed about any new voting method that will be used. In the period when citizens' movements are restricted, as has been the case in most Council of Europe States, a media campaign must be organised to reach out to voters through the most popular means of communication used by citizens during lockdown. This should include traditional channels, such as national TV and radio, but also the Internet and social media platforms. An effective voter education campaign must be carried out in order to ensure that voters are familiarised with new voting methods and no group of voters is excluded.[51]

F. Impacts of postponing or holding elections in times of COVID-19 pandemic

45. It has been demonstrated throughout this paper that making the decision to hold or postpone an election in times of coronavirus is difficult. Both, proceeding with or postponing an election during the coronavirus crisis entail risks for governments, local and regional authorities, the health authorities and election administration bodies. While temporary postponement of elections may be the most responsible decision from the public health perspective, democratic considerations may make the case for holding the elections despite the health risks, while implementing adequate mitigating measures. However, both decisions are likely to have further impacts and cause other risks to materialise.

46. In a democracy, regular elections are part of the fundamental rights of citizens to choose their elected representatives for a given term in office and hold them accountable after each electoral cycle. This fundamental right to vote (or stand) in elections is being suppressed for a period of time if an election is postponed. This loss of democratic voice entails important risks, such as weakening the trust of citizens in democratic processes and institutions and their legitimacy until regular elections are held. Lack of

46 Venice Commission, Code of Good Practice in Electoral Matters, I.3.2.iv.
47 https://search.coe.int/cm/Pages/result_details.aspx?ObjectID=0900001680726f6f; See also Digital technologies in elections - Questions, lessons learned, perspectives, 2020, https://edoc.coe.int/en/elections/8156-digital-technologies-in-elections-questions-lessons-learned-perspectives.html
48 E.g. 2005 local elections in Estonia (and onwards), 2006 local elections in Belgium, 2011 local elections in Norway and 2016 federal elections in Switzerland; See Congress Resolution 290(2009) E-democracy: opportunities and risks for local authorities.
49 Venice Commission, Code of Good Practice in Electoral Matters, I.3.2.v; See however example of the Netherlands.
50 Ibid, I.3.2.vi-ix.
51 https://www.idea.int/sites/default/files/publications/elections-and-covid-19.pdf

elections, including on local and regional level, may also result in a constitutional crisis. What is more, absence of elections on local and regional levels may undermine functioning and legitimacy of local and regional authorities who are in front of coping with crisis. This coupled with effects on national level may add up to the currently ongoing wave of populism across Europe.[52]

47. If postponement is not agreed through consensus between all political parties and all concerned levels of governance as well as, ideally, by the broader public, their holding can be interpreted as political opportunism by incumbents to capitalise on emergency measures curtailing the democratic rights. Therefore, the risk that incumbent governments act unilaterally for political advantage (e.g. supressing authorities on local and regional levels), or at least perceived political advantage, should be considered, to avoid undermining confidence in the process and the legitimacy of the result.[53] In case that postponement is decided by authorities in a way which is constitutionally, legally or procedurally dubious, the decision can be later legally challenged and potentially result in election annulment and profound political/constitutional crisis.

48. A lively political campaign and broad public debate on public policy issues is indispensable for free and fair elections. These may be however dramatically curtailed if citizens are restricted from assembling and moving freely.[54] Moreover, any election campaign may be dominated by the current pandemic, preventing a profound discussion on wider public policy issues from taking place. A lack of political campaigning besides health concerns can also cause lower election turnout and unequal levels of voter participation across different groups in a society. Subsequently, some groups may shape election results more than others. Holding an election during a pandemic can thus reduce the turnout, make elections less inclusive and result in undermining the representative aspect of democracy.[55]

49. Last but not least, there is a risk that authoritarian governments abuse the emergency measures to stay in power. The coronavirus crisis occurred at a time when democracy was already under threat in many places, and the current crisis risks exacerbating democratic backsliding and authoritarian consolidation in some states and regions. Already, some governments have used the emergency to expand executive powers on the central level and restrict political rights by repressing opposition candidates, local and regional authorities, critical media and civil society. This will lead to disturbing the level playing field and undermining the democratic systems.[56]

50. Elections held in such circumstances under emergency conditions may be less free and fair in some European countries than they should be. This can be especially case for some states with shorter democratic traditions and more vulnerable democratic institutions. The Congress, as a guardian of local self-governance, is particularly concerned about the fact that the coronavirus crisis destabilised democratic institutions on various levels and, at times, led to a rapid expansion of central state power at the expense of independent judiciary and/or local self-government. This offered an opportunity for some governments to use emergency powers to repress democracy on local and regional level. From the Congress' point of view, this is a worrying development as local authorities are on the front lines of the crisis response, sometimes reinforcing and sometimes competing with activities of the central state.

G. Summary

51. Holding elections and referendums in times of pandemic represents a great challenge to democracies across Europe no matter whether on local or regional levels or nation-wide. While some Council of Europe States have held elections despite the coronavirus, others have decided for postponement. The decision is not easy to make and an informed guidance from health authorities must be followed. Knowing the sanitary situation in their respective environment, local and regional authorities play an important role in consulting central governments for finding solutions that comply with international standards and best practices. In making this decision and following further steps, the state authorities should cooperate with their counterparts on local and regional level as well as with responsible election administration bodies.

52 See for example the 2017 Report by the Secretary General of the Council of Europe on State of democracy, human rights and the rule of law: Populism - How strong are Europe's checks and balances?
53 See for example the case of Presidential elections in Poland.
54 https://rm.coe.int/sg-inf-2020-11-respecting-democracy-rule-of-law-and-human-rights-in-th/16809e1f40
55 https://www.idea.int/sites/default/files/publications/elections-and-covid-19.pdf
56 See country examples in https://www.rferl.org/a/as-countries-emerge-from-covid-19-lockdowns-debates-emerge-on-how-when-to-hold-important-elections/30605872.html?fbclid=IwAR2f0dpmbeZ8xsE39hV6teOodqg3eRUF9N2mkTiiJd0XTOZEoL_Z6CQ_vXY

52. Should elections be postponed, constitutional and legal principles need to be upheld in order to maintain the rule of law and avoid any harmful effects on democracy both on national as well as on local and regional levels. Before the decision to hold standard electoral activities is taken, relevant alternatives to in-person voting should be explored. However, conformity of any alternative solutions with domestic legal frameworks and international standards for democratic elections must be upheld.

53. In-person elections in times of coronavirus must be undertaken under extraordinary measures that protect the health of voters and electoral staff as well as other agents involved such as observers. Special considerations must be given to the most vulnerable groups. At the same time, the principles of democratic elections must be respected. Finally, it must be acknowledged that both postponing and holding of elections in the situations of extreme crisis entail significant impacts which need to be considered before the decision is taken.

H. Appendix: Country examples

Serbia

54. On 15 March 2020, four days following the World Health Organisation's decision to classify the virus as a pandemic, Serbian President Aleksandar Vučić declared a state of emergency due to the growing concerns regarding COVID-19.[57] When the state of emergency was declared, Serbia was in the midst of a pre-election campaign for parliament and local governments. Elections were due to take place on 26 April, and following the declaration of state of emergency the Republic Electoral Commission (RIK) stopped all election activities on 16 March[58].

55. However, it became clear that the National Assembly never officially approved the decision to declare the state of emergency. Rather, President Vučić by-passed Article 105 of the Constitution and made the decision together with Prime Minster, Ana Brnabić and Speaker of the National Assembly, Maja Gojković, acting upon Article 200 which allows the state of emergency to pass if the National Assembly is "unable to meet". On 30 April, 46 days following President Vučić's declaration of a state of emergency, Speaker Gojković convened the assembly to retroactively approve the decision.[59]

56. Aside from concerns related to the unclear legal situation of the state of emergency, President Vučić came under criticism of domestic opposition as well as internationally for continuing his election campaign in a situation when all other parties and candidates had to reduce their campaign activities. While continuing campaigning, Vučić has been criticised for abusing his position of incumbent and appealing to voters in the public and in the media while praising his handling of the coronavirus epidemic in the country.[60] Additionally, prior to the original call for elections, The Telekom Company, which is primarily state funded, removed station N1 from its cable offer essentially eliminating the only television network the general public could follow with a critical lens toward the ruling party.[61]

57. On 4 May, the RIK announced that the elections were to be rescheduled for 21 June 2020 with many people speculating that the rush to end the state of emergency was in light of the necessary 38-day period before elections could be held. In fact, although there are safety measures put in place for bars, restaurants and other high-profile gathering places, these measures are currently not being enforced. President Vučić announced on 18 May that election will not be a priority if the situation with the coronavirus epidemic worsens and thus could further postpone the election.[62]

58. The boycotting Alliance for Serbia (SZS), which included several prominent opposition parties fell apart during the lockdown, with many parties now stating they will participate in the elections as standalone parties. The names of the parties who are officially participating are still not clear, with less

57 https://tass.com/world/1130457
58 https://europeanwesternbalkans.com/2020/04/01/postponing-the-elections-a-chance-for-dialogue-between-the-ruling-and-opposition-parties/
59 https://europeanwesternbalkans.com/2020/04/24/new-low-for-the-parliamentary-democracy-in-serbia/
60 https://balkaninsight.com/2020/05/07/serbias-president-turned-the-pandemic-into-a-tacky-campaign/
61 https://www.balcanicaucaso.org/eng/Areas/Serbia/Serbia-elections-are-approaching-pressure-on-the-media-is-growing-199409
62 https://www.serbianmonitor.com/en/vucic-if-the-situation-with-the-coronavirus-epidemic-worsens-elections-wont-be-priority/

than a month left prior to election day. No information regarding general safety of voters or logistical execution of elections has yet been disclosed.[63]

France

59. France held its first round of local elections on 15 March amid a steep rise of coronavirus cases across the country and despite the fears that holding the poll will lead to a national health crisis. A delay of the entire election was considered but was not acted upon due to concerns voiced by the opposition. The elections took place following the government's earlier decision to ban gatherings of more than 100 people, shut schools, businesses and restaurants as well as suspend big sporting events.[64]

60. Voting was conducted under special sanitary measures, with hand gel and gloves available to voters and the inside layout of the polling stations adjusted in a way to keep at least one-meter distance between persons. Voters were also asked to bring their own pens. Poll workers were asked to wear masks and gloves and polling booths were regularly disinfected. Before the election, candidates were allowed to hold campaign rallies but with no more than 1,000 people.[65]

61. According to official numbers, the voter turnout reached a historic low of approximately 46 per cent of voters, compared to 63,5 per cent during the 2014 local elections. Reportedly, many voters did not come to the poll for fears of being infected. Media reported on the fact that elections contributed to further spread of the virus amongst some candidates, voters and polling officials.[66]

62. After consultations and a broad agreement, the second-round of local elections was postponed to 28 June.[67] On 23 March, President Macron declared the state of emergency. The postponement has however raised legal issues with regards to the municipalities where the second round is needed to elect the mayors and municipal councillors. In the meantime, mandates of out-going local representatives have been extended which allegedly led to some political tensions. The current situation has also raised questions with regards to the elections to the Senate scheduled for September 2020. Delegates appointed by municipalities have to be nominated in by July to be part of the college electing the senators. Failing to meet these deadlines may result in a constitutional crisis.Therefore, it remains to be seen what consequences postponement of run-offs will bring.

Poland

63. The presidential elections in Poland were scheduled for 10 May. Despite calls to declare a state of emergency, which would constitutionally postpone the elections in times of growing cases of coronavirus, the ruling PiS party insisted that the elections be held as scheduled through all-postal voting. This became an issue as the coronavirus lockdown undermined campaigning and prevented candidates from holding public rallies, which gave an advantage to the incumbent president Duda who continued making public appearances. Apart from resistance of the opposition parties controlling the Senate, the planned postal ballot was also opposed by the Post of Poland due to the lack of capacity to conduct an all postal vote election for the first time in Poland's history and in an extremely short timeframe.[68]

64. The ruling party's legislative draft introducing all-postal voting in presidential elections presented in the Sejm only a month before the election came under fierce criticism by domestic commentators as well as by international election observers and European Union officials.[69] One of the points of criticism was the introduction of all-postal vote without a possibility to voters to opt for in-person voting. The draft law was also criticised for moving the task of organising the election away from the National Election

63 https://www.nytimes.com/aponline/2020/05/04/world/europe/ap-eu-serbia-election.html
64 https://www.bbc.com/news/world-europe-51862828?fbclid=IwAR3_uQNYdFKVUj6cUl8h_6PUTpz6cLH2042CwtKVQaXzcpOSRhKkYyt5ssA
65 https://www.idea.int/news-media/multimedia-reports/global-overview-covid-19-impact-elections#COVID-19%C2%A0IMPLICATIONS%20ON%20ELECTION%20PREPARATIONS
66 https://www.lefigaro.fr/politique/coronavirus-le-lourd-tribut-paye-par-les-elus-locaux-20200329?fbclid=IwAR2IT0w7U58n7PUtyy7l_vLCw4aUTFq21svf4Om9L9TZ6Tk9mtoKcfCuWUM and https://mobile.francetvinfo.fr/sante/maladie/coronavirus/elections-municipales-a-saint-ouen-un-tiers-des-assesseurs-ont-declare-des-symptomes-evocateurs-du-coronavirus_3928917.html?fbclid=IwAR1zO0l1_Dfok1J1ppWgb34VXLSaRvGqeQJNwzn-39Dhq3GIEkOSiZ_UZQs
67 https://www.france24.com/en/20200522-france-to-hold-final-round-of-local-elections-on-june-28-after-covid-19-delay
68 https://www.euronews.com/2020/04/28/poland-s-all-postal-presidential-vote-dangerously-undermines-democracy-warns-hrw
69 https://www.osce.org/odihr/elections/poland/450856?download=true and https://www.reuters.com/article/us-health-coronavirus-poland-election/polish-presidential-postal-ballot-raises-concern-eu-commissioner-idUSKBN21Q0MF

Commission (NEC) to the Ministry of State Assets which is under close control of the government. Procedurally, the adoption of draft legislation was criticised for being approved in a rushed vote, with no committee hearings or consultations with electoral practitioners, local government bodies or the Post of Poland.[70] The NEC expressed its reservations about the plan, the Minister of Health advised to revise the timeline, and the outgoing Chair of the Supreme Court called upon the ruling party to change its course and postpone the vote to a later date.[71]

65. According to the draft law, the Post of Poland would be obliged to distribute ballots during the seven days before the election day and voters were to cast ballots in specially designated collection boxes only on the day of the election. Acting on the draft legislation, it had been requested that local governments hand over sensitive voter data to the Post of Poland. This move raised serious concerns among many local governments, often controlled by the opposition, questioning the legality of the request and data security guarantees.[72]

66. Only four days prior to election day, the ruling coalition announced that it now supported the postponement of the election to a later date. On 10 May, there was no formal resolution adopted on the postponement and election day concluded without any votes taking place and with an official 0 per cent turnout.[73] One day later, the Supreme Court issued a statement that it was not in the position to certify or reject the validity of the election since the NEC had not presented the court with the necessary resolution on the final results.[74] Ramifications of this legal situation are uncertain and the new date of the presidential elections as well as the voting method are still a matter of political debate at the time of writing.

Germany (Bavaria)

67. The German federal state of Bavaria held the first round of local elections amid the coronavirus pandemic on 16 March, offering voters both options of postal voting as well as in-person voting in polling stations. Voting in polling stations was accompanied by precautionary measures such as wearing of gloves and washing hands by disinfection, voters were also asked to bring their own pens.[75] The second-round run-off was held on 29 March by postal vote only. The decision to hold the second-round by all-postal ballot was made after necessary logistical arrangements were imposed following the first round by the federal authorities due to the health risks as Bavaria became the second most coronavirus affected German state.[76]

68. The right to vote by post has long been an option for registered voters in Bavaria who do not need a specific reason to exercise their right to vote by post and may do so also when they are temporarily abroad. The polling cards (stamped with an official authorisation issue by the municipality) as well as postal ballot documents requested for postal voting are sent by the authorities to an address of choice to all registered voters. The postal ballot documents compose the ballot paper, official ballot paper envelope (blue), official return envelope (red) with the address where the ballot is to be sent and the code of constituency, and detailed postal voting instructions. While in the first-round voters had to apply for postal voting either in person or in writing, for the run-off, postal ballot documents were sent automatically to all voters.[77]

69. As for the voting procedure, voters are requested to mark the ballot alone and put the ballot paper into the ballot paper envelope (blue), which then has to be sealed. Place and date of voting has to be indicated on the polling card and the card has to be signed by voter. The polling card is put into the return envelope (red) together with the sealed ballot envelope. The return envelope is sealed and sent unstamped or handed in at a designated place in person. Postal ballot boards within the constituency determine the result of the postal ballot where, this time, election workers used precautions such as protective gloves. The secrecy of the vote is guaranteed at any time by the federal law of Bavaria.[78]

70 https://www.idea.int/news-media/news/switching-all-postal-voting-times-public-health-crises-lessons-poland
71 https://www.epde.org/en/news/details/timeline-of-the-election-chaos.html
72 https://www.politico.eu/article/polish-postal-vote-raises-data-privacy-concerns/
73 https://www.theguardian.com/world/2020/may/11/poland-holds-ghost-election-with-0-turnout
74 https://www.epde.org/en/news/details/timeline-of-the-election-chaos.html
75 https://www.euronews.com/2020/03/15/germany-bavaria-s-municipal-elections-go-ahead-despite-coronavirus-concerns
76 https://www.dw.com/en/coronavirus-affects-election-turnout-in-france-bavaria/a-52787502
77 https://www.bundeswahlleiter.de/en/bundestagswahlen/2017/informationen-waehler/briefwahl.html#2ea3c20d-4012-4542-a2a4-5cf1f5a10d5b
78 Ibid.

70. Despite fears that postal voting in the midst of a pandemic would cause lower turnout, voter participation reached 58,8 per cent, higher than in the previous local elections in 2014. In total, approximately 10 million people were eligible to take part in 4,000 state-wide polls for some 40,000 elected positions at different levels. The run-off took place in 750 municipalities, among them in five biggest cities in Bavaria. [79] The election process was generally praised for its credibility and inclusiveness.

South Korea

71. Parliamentary elections held in South Korea on 15 April became one of the first elections conducted amid the coronavirus pandemic. South Korea implemented a set of measures throughout the process ensuring democratic standards of elections and a safe voting environment. This was accompanied by a high degree of transparency and communication of the election administration with the public. The democratic quality of elections was also boosted by a relatively smooth shift of political parties to alternative methods of campaigning, including online and digital contents communicated through social media and internet applications.[80]

72. As one of the first measures implemented during the elections, the National Election Commission (NEC) encouraged all voters to make use of early voting provision, established in 2013, and cast their ballots in advance of election day on 10 and 11 April at any of the 3,500 polling stations. The NEC also extended early postal voting provisions to more categories of voters, including COVID-19 patients treated in hospitals and citizens in quarantine. COVID-19 patients who missed the legal deadline to apply for early postal voting, along with medical and support staff, could cast an early vote at special polling stations established in hospitals. As a result, 26,7 per cent of voters voted in advance which helped to reduce the number of voters crowding in polling stations on election day.[81]

73. For those casting their ballot in-person on election day, efforts were made to guarantee a safe voting environment. To this end, the NEC disseminated a Code of Conduct for Voters which provided detailed instructions that voters were required to follow. These included wearing of face masks while queuing, checking temperature and possible respiratory problems before entering polling stations, keeping a distance of a minimum of one meter from other persons, sanitising hands and wearing plastic gloves. Voting areas were equipped with signs facilitating social distancing, Voters symptomatic of COVID-19 were sent to specially assigned polling stations with higher degrees of protection.[82]

74. Similar measures also applied to other agents involved in the process, including the poll workers who were responsible for frequent sanitising of voting premises and electoral materials. The premises were regularly ventilated. Poll workers managing special polling stations were equipped with full-body protective clothing, face protection, masks and plastic gloves to prevent the greater risks of exposure to infection. Authorities reported that 20,000 more polling workers than usual were hired to implement the safety measures.[83]

75. As a result of adopted measures, nearly 66 per cent of eligible voters participated in the elections. However, as noted by election experts, the experience of South Korea needs to be contextualised in several respects. First of all, the level at which the virus spread in the country was contained relatively quickly and remained low. Second, a number of legal and procedural provisions to facilitate inclusion and participation of voters have already been part of South Korea's electoral framework. Third, the country had at its disposal the resources and means to create safe voting environments. Finally, the political environment in the country was conducive to accepting the extraordinary measures by political parties and voters.[84] Nonetheless, the lesson learned from the example of South Korea shows that a combination of different measures may ensure both democratic standards and safety of voters.

79 https://www.dw.com/en/coronavirus-affects-election-turnout-in-france-bavaria/a-52787502
80 https://edition.cnn.com/2020/04/13/asia/elections-coronavirus-pandemic-intl-hnk/index.html
81 https://www.reuters.com/article/us-health-coronavirus-southkorea-electio/south-korean-coronavirus-patients-vote-as-general-election-kicks-off-idUSKCN21S03W
82 https://www.bbc.com/news/world-asia-52275993
83 https://edition.cnn.com/2020/04/13/asia/elections-coronavirus-pandemic-intl-hnk/index.html
84 https://www.idea.int/sites/default/files/publications/managing-elections-during-pandemic-republic-korea-crucial-test.pdf