



CDDH(2025)R102 Addendum 1  
25 June 2025

## STEERING COMMITTEE FOR HUMAN RIGHTS (CDDH)

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### COMMENTS ADOPTED BY THE CDDH<sup>1</sup> ON RECOMMENDATIONS OF THE CONGRESS OF LOCAL AND REGIONAL AUTHORITIES

- [525 \(2025\)](#) “Foreign interference in electoral processes at local and regional levels”
- [527 \(2025\)](#) “Empowering cities and regions to combat human trafficking for labour exploitation”

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<sup>1</sup> At its 102nd meeting, 25–27 June 2025.

## **Recommendation [525 \(2025\)](#) “Foreign interference in electoral processes at local and regional levels”<sup>2</sup>**

1. The Congress of Local and Regional Authorities of the Council of Europe (“the Congress”) refers to:

- a. the European Charter of Local Self-Government (ETS No. 122) and its Additional Protocol on the right to participate in the affairs of a local authority (CETS No. 207);
- b. Recommendation (2003)<sup>4</sup> of the Committee of Ministers on common rules against corruption in the funding of political parties and electoral campaigns;
- c. Recommendation CM/Rec(2017)51 of the Committee of Ministers to member States on standards for e-voting;
- d. the Committee of Ministers’ Guidelines on the use of information and communication technology (ICT) in electoral processes in Council of Europe member States (2022);
- e. Resolution 2390 (2021) “Transparency and regulation of donations to political parties and electoral campaigns from foreign donors” of the Parliamentary Assembly of the Council of Europe;
- f. the Venice Commission Code of Good Practice in Electoral Matters (2002), the Venice Commission, Guidelines on Political Party Regulation, (Second Edition, 2020) and its Opinion on the Prohibition of Financial Contributions to Political Parties from Foreign Sources (2006);
- g. Congress Recommendation 518 (2024) “Recurring issues based on assessments resulting from Congress monitoring of the European Charter of Local Self-Government and election observation missions (reference period 2021-2024)”;
- h. Congress Recommendation 498 (2023) “Local and regional media: watchdogs of democracy, guardians of community cohesion”;
- i. Congress Recommendation 478 (2022) “Hate speech and fake news: the impact on working conditions of local and regional elected representatives”;
- j. the Reykjavik Declaration following the Fourth Summit of Heads of States and Government of the Council of Europe (2023), reaffirming the commitment “to hold elections and referenda in accordance with international standards and take all appropriate measures against any interference in electoral systems and processes”, and the revised Priorities of the Congress for 2021-2026;
- k. United Nations Sustainable Development Goal 16: Peace, Justice and Strong Institutions; Target 16.7: Ensure responsive, inclusive, participatory and representative decision-making at all levels.

2. The Congress points out that:

- a. local and regional elections, while attracting modest interest from authoritarian actors, are not immune to the threat of foreign interference in electoral processes to influence the results of an election, via instances of disinformation, opportunistic cyber-attacks and illicit funding. Despite foreign interference being an old and complex phenomenon, recent geopolitical changes and new technological developments have increased the scale, the number of involved actors and the reach of such actions, making it even harder to attribute these attacks to a state actor;
- b. grassroots elections should be decided by the voters residing in a community and having the right to participate in the affairs of a local authority and therefore, national, regional and local authorities should take steps to protect the integrity of electoral processes and to ensure that voters form their opinion free from interference and according to their convictions and have the freedom to express such opinion on election day;
- c. while refraining from overemphasising the issue and feeding narratives about rigged electoral systems, a careful examination of recent cases reveals the emergence of many challenges in the handling of potential foreign interference, such as the corrosive effect of small incidents, the increasing manipulation of the concept for political purposes, the growing importance of non-state actors (private companies, individuals, transnational groups, etc) and domestic actors and the potential multiplier that artificial intelligence could represent.

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<sup>2</sup> Debated and adopted by the Congress on 26 March 2025 (see document [CG\(2025\)48-10](#), explanatory memorandum), rapporteur: Stewart DICKSON, United Kingdom (R, ILDG).

3. In light of the foregoing, the Congress invites the Committee of Ministers to call on member States to:
- a. increase efforts to gather scientific and technical knowledge about the issue of foreign interference prior to, during and after local and regional electoral processes, especially in highly contested elections;
  - b. acknowledge the potential risks associated with foreign interference in local and regional elections and support local and regional authorities in developing infrastructures and expertise to deal with potential threats and disruption;
  - c. strengthen political party and campaign finance regulations and oversight to prevent illicit funding of contestants by foreign donors and if not already the case, consider prohibiting foreign and anonymous donations to both political parties and candidates, including in local and regional elections;
  - d. explore ways of fostering open debate at local and regional levels, work towards debunking alternative narratives and addressing the impact of alternative information environments;
  - e. reinforce behavioural change by promoting voter education and awareness, in particular of new voters, or from vulnerable groups, to build capacity to identify deceptive foreign information manipulation and to encourage critical thinking, in collaboration with civil society and political parties;
  - f. promote capacity-building of local and regional authorities, in particular lower-level election administration bodies, on cyber security related to various aspects of the electoral process, in particular to voter registers and results management, in order to detect, understand and counter new threats to the integrity of elections;
  - g. build the capacities of political parties and candidates in local and regional elections to detect and prevent foreign interferences and protect their systems potential cyberattacks;
  - h. refrain from taking hasty measures such as enacting overly restrictive foreign influence laws, that could clearly jeopardise certain actors, including civil society, and support fact-based journalism, including in minority languages;
  - i. avoid holding local and regional elections on the same day as national ones, to better monitor and protect these elections from large-scale malicious operations.
4. The Congress calls on the Committee of Ministers, the Parliamentary Assembly and other relevant institutions of the Council of Europe to take account of this recommendation and of the accompanying explanatory memorandum in their activities relating to member States.

## **CDDH COMMENTS**

1. The CDDH takes note of Recommendation 525 (2025) of the Congress of Local and Regional Authorities, "Foreign interference in electoral processes at local and regional levels". It shares the Congress' concerns, recalling further the interdependence of democracy, human rights, and the rule of law, as reflected in the Statute of the Council of Europe and the European Convention on Human Rights (the Convention), and the interrelatedness of human rights and fundamental freedoms.

2. The CDDH notes that several issues raised in Recommendation 525 (2025) may have implications for protected rights and freedoms, including the freedoms of expression, assembly and association under Articles 10 and 11 of the Convention. It recalls that these freedoms are given particular protection when exercised in the political sphere. They may nevertheless be limited, as prescribed by law and where necessary in a democratic society, in pursuit of certain defined public interests. As regards the right to free elections, guaranteed by Article 3 of Protocol No. 1 to the Convention, the CDDH recalls that this is limited in

application to elections to the national parliament,<sup>3</sup> unless the national constitution foresees the exercise of legislative power by local or regional authorities.<sup>4</sup>

3. Finally, as regards paragraph 2(c) of Recommendation 525 (2025), the CDDH recalls its ongoing work on a draft Handbook on Human Rights and Artificial Intelligence, which will include a section on artificial intelligence and democratic processes.<sup>5</sup>

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### Recommendation [527 \(2025\)](#) “Empowering cities and regions to combat human trafficking for labour exploitation”<sup>6</sup>

1. The Congress of Local and Regional Authorities of the Council of Europe refers to:

- a. the explanatory memorandum “Empowering cities and regions to combat human trafficking for labour exploitation” (CG(2025)48-13);
- b. Congress Recommendation 165 (2005) “The fight against trafficking in human beings and their sexual exploitation: the role of cities and regions”, and the Declaration on the fight against trafficking in human beings, opened for signature during the 13th Plenary Session of the Congress in 2006;
- c. the Council of Europe’s Convention on Action against Trafficking in Human Beings (CETS No.197);
- d. the Reykjavik Declaration adopted at the 4th Summit of Heads of State and Government of the Council of Europe (2023), which recalls the necessity of fighting trafficking in human beings;
- e. Recommendation CM/Rec(2022)21 of the Committee of Ministers on preventing and combatting trafficking in human beings for the purpose of labour exploitation and its explanatory memorandum asking member States to facilitate multi-agency and multi-disciplinary co-operation with regional and local authorities to combat trafficking in human beings for the purpose of labour exploitation;
- f. the work developed by the Council of Europe Group of Experts on Action against Trafficking in Human Beings, notably the “Guidance note on preventing and combatting trafficking in human beings for the purpose of labour exploitation” (GRETA(2020)12), and the “Compendium of good practices in addressing trafficking in human beings for the purpose of labour exploitation” (GRETA(2020)08);
- g. Parliamentary Assembly Resolution 2536 (2024) of the “Precarious and irregular work situations of migrant seasonal and domestic workers” ;
- h. the Sustainable Development Goals (SDGs) of the United Nations 2030 Agenda for Sustainable Development, specifically Goal 8 on decent work and economic growth, and its Target 8.7 to eradicate forced labor, modern slavery, and human trafficking.

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<sup>3</sup> Article 3 of Protocol No. 1 reads as follows: “The High Contracting Parties undertake to hold free elections at reasonable intervals by secret ballot, under conditions which will ensure the free expression of the opinion of the people in the choice of the legislature.”

<sup>4</sup> See, for example, *Miniscalco v. Italy*, App. no. 55093/13, 17 June 2021, paras. 75 – 78.

<sup>5</sup> See the reports of the third and fourth meetings of the CDDH Drafting Group on human rights and artificial intelligence, CDDH-IA(2025)R3 and CDDH-IA(2025)R4.

<sup>6</sup> Debated and adopted by the Congress during the 48th Session on 26 March 2025 (see document [CG\(2025\)48-13](#), explanatory memorandum, co-rapporteurs Cecilia DALMAN EEK, Sweden (R, SOC/G/PD) and Martine DIESCHBURG-NICKELS, Luxembourg (L, ILDG).

2. The Congress notes with concern that:

- a. trafficking in human beings for the purpose of labour exploitation has been on the rise in many Council of Europe member States, particularly affecting vulnerable populations who are often exploited in sectors including agriculture, construction and domestic work;
- b. children, especially unaccompanied and separated migrant children, are increasingly exposed to human trafficking, notably in a context of conflict, economic hardship, family disfunction and inadequate child protection measures;
- c. human trafficking has a profoundly negative impact on local communities, undermining the enjoyment of human rights and social cohesion, perpetuating poverty and contributing to the normalisation of exploitative labour practices, not only harming the victims but also destabilising local and regional economies and straining public services;
- d. human trafficking should be a key issue on local and regional authorities' agendas as it occurs within their jurisdictions, exploiting local infrastructures and regulations and affecting residents directly, and as they are the level of governance most likely to be able to identify and provide support to potential victims and vulnerable populations;
- e. local and regional authorities, despite being the first point of contact for many victims of trafficking, frequently lack the necessary resources, training and coordination mechanisms to effectively prevent and combat human trafficking, including for the purpose of labour exploitation;
- f. victims of human trafficking, including for the purpose of labour exploitation, face significant barriers to accessing legal, psychological and social support systems, especially in smaller municipalities and rural areas where such services may be scarce, impacting the likelihood of reporting and identification of victims;
- g. the social and economic harm caused by human trafficking, including for the purpose of labour exploitation, necessitates a robust response at local and regional levels, including the involvement of local businesses, civil society and community members to combat these practices and support the reintegration of victims;
- h. the complex and organised nature of human trafficking networks require a coordinated, multi-level approach that integrates local, regional and national efforts to dismantle these networks and provide support to victims.

3. The Congress asks the Committee of Ministers to invite the respective national authorities of the member States of the Council of Europe to:

- a. enhance vertical coordination by ensuring that national anti-trafficking actions and strategies are developed in consultation with local and regional authorities and their associations and by providing clear guidance on the implementation of new actions;
- b. promote and support the collection and sharing of disaggregated data on confirmed and suspected cases of human trafficking, including for the purpose of labour exploitation, by actors and services involved at all levels in order to obtain a comprehensive picture of the state of human trafficking and high-risk areas across the territory;
- c. develop a coherent national approach to anti-trafficking efforts that clearly defines the duties and mandates of different authorities, prioritises human rights and victim protection, and encourages safe reporting, particularly for undocumented migrants, unaccompanied and separated children and other persons in precarious situations, ensuring that authorities at different levels of governance receive the means and support needed to carry out their responsibilities;
- d. support the improvement of assistance to victims and potential victims by facilitating the creation of multidisciplinary networks and teams at local and regional levels, ensuring they have adequate funding and means to provide specialised support to victims and offer low-threshold outreach services to vulnerable populations.

## CDDH COMMENTS

1. The CDDH takes note of Recommendation 527 (2025) of the Congress of Local and Regional Authorities “Empowering cities and regions to combat human trafficking for labour exploitation”. It shares the Congress’ concern at the phenomenon of trafficking in human beings for the purpose of labour exploitation and agrees that the Council of Europe and its member States should take effective action against it, including as appropriate at local and regional levels.

2. In this connection, the CDDH recalls [Recommendation CM/Rec\(2022\)21](#) of the Committee of Ministers to member States on preventing and combating trafficking in human beings for the purpose of labour exploitation, which it had drafted on the basis of *inter alia* the standards of the European Convention on Human Rights and the European Social Charter, [Recommendation CM/Rec\(2016\)3](#) of the Committee of Ministers to member States on human rights and business, which it had also drafted, and the work of the Group of Experts on Action against Trafficking in Human Beings (GRETA). The CDDH notes in particular paragraph 3 of Recommendation CM/Rec(2022)21, which calls for wide dissemination of the recommendation and its explanatory memorandum among the competent authorities and stakeholders at national, regional and local levels, and the accompanying explanatory memorandum, which promotes multi-disciplinary co-operation involving *inter alia* representatives of regional authorities.

3. Finally, the CDDH recalls that at its 99th meeting in November 2023, it exchanged views with the Executive Secretary of GRETA on the latter’s activities to promote awareness and implementation of Recommendation CM/Rec(2022)21.