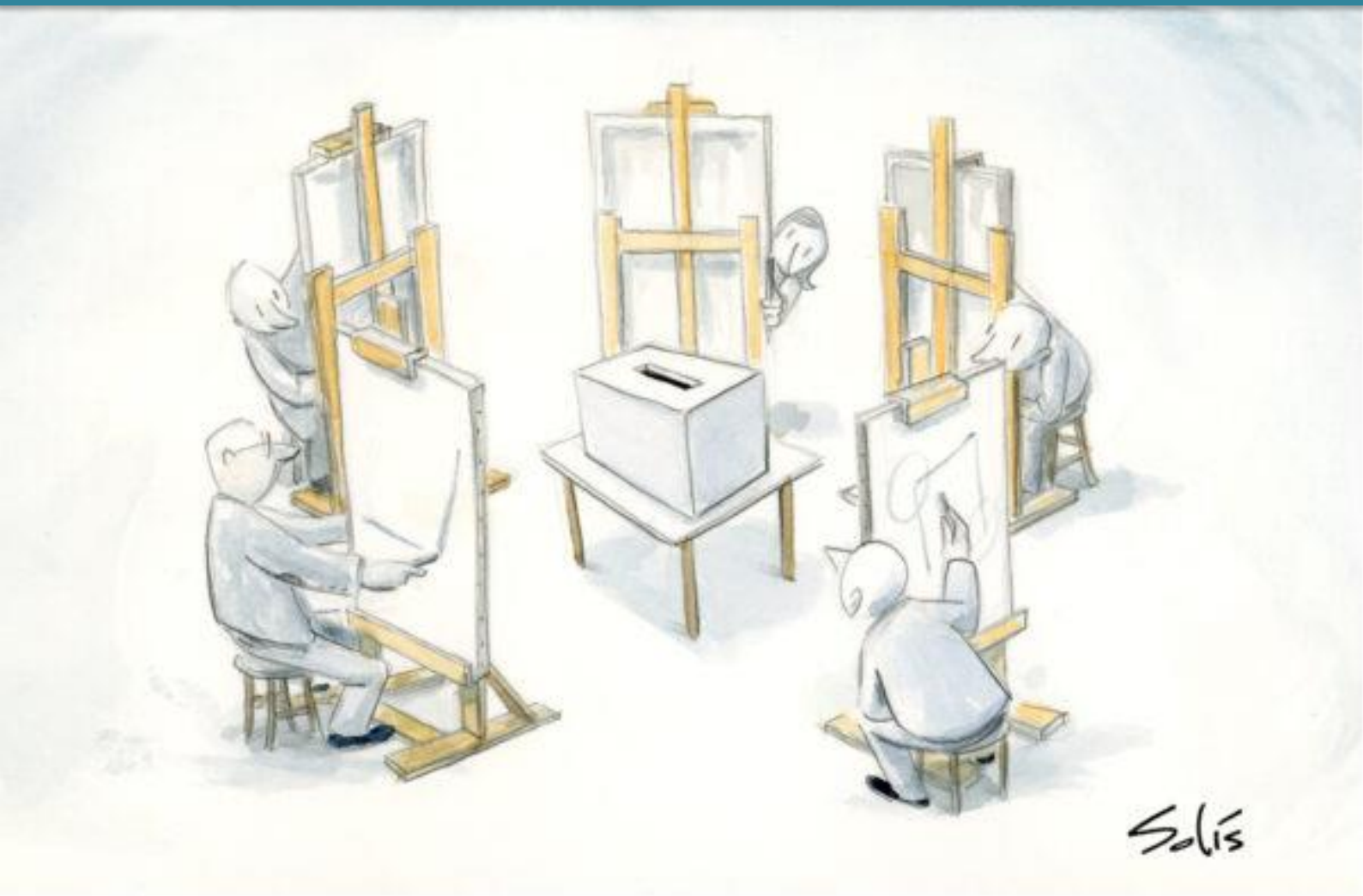
MEDIA COVERAGE OF ELECTIONS

TRAINING PROGRAMME



Cartooning for Peace

Cooperation on Freedom of Expression

2026

COUNCIL OF EUROPE

CONSEIL DE L'EUROPE

The role and responsibility of the Council of Europe in protecting freedom of expression and media freedom is underlined in the Council of Europe New Democratic Pact for Europe.

Council of Europe has developed a range of training programmes designed to strengthen knowledge and capacities of judges, prosecutors, legal professionals, police staff, journalists and media actors, and public servants from relevant public authorities, in key areas: Countering the use of SLAPPs, Safety of Journalists, and Access to Information in the context of Freedom of Expression.

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This Council of Europe Training on Media Coverage of Elections was developed by Council of Europe international Consultant, Rasťo Kužel.

TRAINING PROGRAMME

MEDIA COVERAGE OF ELECTIONS

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TRAINING PROGRAMME

MEDIA COVERAGE OF ELECTIONS

TRAINERS GUIDE

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I. General description of the training

Media coverage of elections is a fundamental component of democratic processes, enabling citizens to make informed choices based on accurate, pluralistic and impartial information. Ensuring fair, balanced and independent media coverage during election periods is essential to safeguard public trust, promote political pluralism and prevent the spread of disinformation and undue influence. In this regard, Council of Europe standards and recommendations provide an important framework for protecting freedom of expression, advancing media independence and equal opportunities for political actors and responsible election coverage. Targeted training for journalists, media regulators, electoral commissions and other relevant stakeholders can support professional and ethical reporting, reinforce the role of the media as a guarantor of democratic accountability, and address emerging challenges associated with online campaigning, political advertising and disinformation. Such initiatives contribute to fostering transparent, inclusive and credible electoral processes and, ultimately, to strengthening democracy.

Target Audience: The training is intended for media regulators, election management bodies (EMBs), journalists and editors, civil society organisations, election observers and other professionals working on electoral communication. Relevant modules can also be used with legal professionals, public institutions, researchers and organisations concerned with inclusion, journalist safety and digital governance. The materials support both specialist groups and training that brings together participants with different professional responsibilities.

Format: In-Person Training. The Programme can be delivered onsite, as a complete programme or through selected modules and sessions. It can also be adapted for online or blended delivery, provided that discussion, group work and debriefing remain adequately supported.

The trainer guides provide different delivery routes. Timings vary by module and reflect the practical work required. Trainers should use the relevant module's route table and allow additional time for breaks, interpretation, preparation and any additional training-of-trainers activities. Modular delivery should begin with the intended learning outcomes and participants' existing knowledge. Where a later module is delivered independently, trainers should provide the concepts and standards needed for its exercises. For example, a monitoring session requires a shared understanding of fairness and pluralism, while an incident-response exercise requires clarity about evidence and institutional mandates.

National adaptation should address the legal framework, electoral calendar, institutional responsibilities, media environment, platform use, languages and barriers to participation. Trainers should distinguish Council of Europe standards, applicable EU law, national rules, professional self-regulation and platform policies. Examples and expected outputs should reflect the responsibilities of the audience.

II. Objectives and expected outcomes

The overall objective is to strengthen participants' ability to assess electoral communication and improve professional practice while protecting freedom of expression and the right to free elections. Depending on the modules selected, participants should be able to:

- explain the roles and responsibilities of the main actors in electoral communication;
- identify relevant standards and distinguish legal obligations, institutional guidance, professional ethics and platform policies;
- assess fairness, pluralism, equitable treatment and inclusion across different media and communication formats;
- design and apply transparent monitoring methods, combining quantitative evidence with qualitative analysis;
- examine disinformation, information manipulation and political advertising without making claims beyond the available evidence;
- identify responsible institutions and develop proportionate responses, practical recommendations and arrangements for preparedness and follow-up.

Learning should result in practical outputs relevant to participants' work. These may include a coverage plan, monitoring design, evidence assessment, institutional referral, public communication, recommendation or response protocol.

III. Training of trainers' session

The Programme can also be used for training-of-trainers (ToT) sessions. These should develop both subject knowledge and the ability to facilitate learning, adapt materials and assess participants' work. Training-of-trainers activities should also require participants to explain their adaptation choices: why a case suits the audience, which national sources need checking, what accessibility measures are necessary and how the session preserves the relevant standards. The module-specific trainer guidance provides further prompts and assessment criteria.

IV. Training methodology

The training uses participatory and practical methods that build on participants' professional knowledge and experience. Trainers should use this as the starting point for discussion and exercises, linking new concepts to the challenges and decisions participants face in their work.

Methods include individual reflection, paired analysis, small-group discussion, coding exercises, case comparisons, role simulations and action planning. Presentations support these activities; trainers should select the slides that serve the chosen learning outcomes. Trainers should provide suitable formats, allow sufficient time for participation and offer alternatives to activities involving movement or exposure to distressing content. Real cases

should be verified and handled carefully; fictional or composite scenarios should be clearly identified.

Assessment should focus on participants' ability to apply the material. Short opening questions can establish prior knowledge, while practical outputs, peer feedback and individual learning checks can show what participants have learned. At the end of a session, participants should identify how they will use the learning in their professional setting.

Trainers can start with the cross-cutting core standards, then select the official entries linked to the module and exercise being delivered. For a short session, assign focused extracts from CM/Rec(2022)12 and one module-specific resource, together with the primary institutional source where a real case is used. Specify the pages or sections to read and the question they support. The reading-routes table at the end of this document gives further guidance for each delivery option.

Extended modules and training-of-trainers sessions can draw on additional institutional reports and national materials.

Label	How to use it
CoE	Council of Europe standard or case-law source relevant across member States, subject to its legal status.
EU-only where applicable	Use only within the scope of EU law and the relevant national implementing or designated-authority arrangements.
Official election report or decision	Use as a primary institutional source for the relevant election, monitoring scope or proceeding; it is not a universal rule or complete country assessment.

Selection principles

- Use the most recent official standard as the anchor and older official material for detail or historical development.
- Read every real case in its primary institutional source before delivery; distinguish allegations, monitoring findings and legal determinations.
- Match the reading load to the audience. Regulators and lawyers may need the full legal text; journalists and civil society may benefit more from an official extract and an applied case.
- Keep participant handouts free of suggested outcomes and trainer debriefs.
- Check national law, institutional names, jurisdiction, platform policies and links shortly before each delivery.
- Choose the route that matches the learning objectives and available time :

Route	Select	Purpose
Short session	**Essential selection:** relevant provisions of CM/Rec(2022)12, one module-specific resource and the primary institutional source for any real case selected. Use focused extracts rather than assigning whole publications. **How to use them:** give participants one guiding question and the material needed for one exercise. For example, for Module 4, combine the relevant standard with an extract from the CoE media-monitoring toolkit and a selected monitoring case. The trainer should read the full case source and prepare the debrief.	Enough authority and context for one applied exercise.
Standard module	**Essential selection:** use CM/Rec(2022)12 alongside the relevant guidance in CM/Rec(2007)15. Select their relevant provisions, the human-rights provisions needed for the exercise, one methodology or practical resource, and one or two primary case sources. **How to use them:** identify the pages or sections participants should read and link each to a task. A methodology source explains how to assess the issue; a case source supplies the documented facts and outcome. For Module 3, this could include CM/Rec(2018)1 on pluralism and a selected ODIHR report. Trainers should consult the fuller sources and prepare questions on context and evidential limits.	Supports explanation, practice and a defensible debrief.
Extended module	**Essential selection:** the standard route, supplemented by comparative institutional reports or decisions and applicable national materials, such as election and media laws, regulator decisions or professional codes. **How to use them:** select comparisons that illuminate a defined issue, such as access criteria, monitoring methods or institutional responses. Ask participants to compare the standard, facts, responsible institution and outcome, then explain which lessons apply nationally. Allocate different sources to groups if reading time is limited. Verify national provisions and later case developments before delivery.	Allows deeper institutional, legal and audience-specific work.

Route	Select	Purpose
Training of trainers	**Essential selection:** the extended selection appropriate to the chosen modules, together with the trainer guidance, participant exercises, presentation and any accompanying slide notes, and ToT reflection prompts. **How to use them:** ask prospective trainers to prepare a short session plan distinguishing essential and optional reading, specifying national adaptations, and setting debrief questions and learning checks. They should practise explaining a source and facilitating an exercise, then receive peer feedback. Keep suggested answers separate during the participant exercise; examine them afterwards as part of trainer preparation.	Enables future trainers to justify selection, adaptation, facilitation and safeguarding choices.

V. Programme structure

The Programme consists of nine modules. The sequence moves from common concepts and standards to specialised analysis, practical cases and institutional responses.

Module	Main focus
1. Electoral Communication and Media Core Concepts	Establishes a shared vocabulary and examines the actors, channels, democratic functions and interconnected rights involved in electoral communication.
2. Legal and Ethical Framework	Introduces the relevant standards, institutional responsibilities and principles for assessing rules, restrictions and remedies.
3. Fairness, Pluralism and Equitable Treatment	Examines access, editorial coverage, diversity and the circumstances in which equal or differentiated treatment may be appropriate.
4. Assessing Media Coverage and Identifying Imbalances	Develops practical skills in sampling, coding, reliability checks, interpretation and evidence-based reporting.

Module	Main focus
5. Disinformation and Information Manipulation	Examines narratives, behaviour, distribution, synthetic media and potential harms, linking verification to proportionate responses.
6. Digital Platforms and Political Advertising	Addresses platform systems, paid political advertising, sponsorship, transparency, targeting and the responsibilities of different actors.
7. Inclusive and Responsible Coverage	Examines representation, direct voice, portrayal, accessibility, discrimination and safety in electoral communication.
8. Risks, Violations and Practical Case Studies	Applies the earlier modules through cases involving evidence, jurisdiction, urgency, procedural safeguards and remedies.
9. Good Practices, Response Strategies and Building Resilience	Turns analysis into preparedness, coordination, public communication, recommendations and learning across election cycles.

Each module contains three complementary resources:

- **A presentation**, supporting the main concepts, examples and discussion.
- **Participant exercises**, providing scenarios, tasks and worksheets.
- **Trainer guidance**, explaining objectives, learning outcomes, preparation, delivery options, facilitation, suggested outcomes, assessment and adaptation.

Trainers should use these resources together. Participant exercises should be distributed separately from the trainer guidance so that suggested answers and case outcomes do not pre-empt participants' analysis. The recommended reading and reference materials form part of this Introduction and connect the modules with relevant standards, methodological resources, institutional reports and decisions.

Before delivering a module, trainers should review its objectives, expected outcomes and delivery options, and select activities suited to participants' experience and professional responsibilities. Preparation should include reviewing the presentation and exercises alongside the trainer guide, checking the sources, adapting examples to the national context and arranging any necessary materials or accessibility support. Session planning should allow sufficient time for practical work, discussion, debriefing and assessment.

Module 1 Electoral Communication and Media Core Concepts

This opening module establishes a shared understanding of how media and other communication actors shape elections and democratic participation. It examines the connected rights and responsibilities of voters, political contestants and the media, and maps the roles of traditional media, digital platforms and other information sources. Participants learn to distinguish editorial coverage, political advertising, campaign communication and voter information, while considering how selection, prominence, framing and amplification influence visibility. Practical exercises introduce the concepts and analytical questions developed throughout the Programme.

❖ Official sources

- **Recommendation CM/Rec(2011)7 on a new notion of media** [CoE]
  Use to classify actors and functions in a converged environment without assuming that every online actor is regulated like a broadcaster. **Programme link:** Sessions on media functions and types and the hybrid environment.
- **Recommendation CM/Rec(2018)2 on the roles and responsibilities of internet intermediaries** [CoE]
  Supports the distinction between editorial decisions, intermediary functions and differentiated duties and remedies. **Programme link:** Rights triangle and communication-chain exercises.
- **Recommendation CM/Rec(2020)1 on the human rights impacts of algorithmic systems** [CoE]
  Introduces the human-rights implications of ranking, recommendation and automated systems. **Programme link:** Hybrid information environment and risks and opportunities.
- **Recommendation CM/Rec(2007)3 on the remit of public service media in the information society** [CoE]
  Clarifies the democratic, universal and pluralistic remit of public service media across services and technologies. **Programme link:** Media functions and actor mapping.
- **Recommendation CM/Rec(2018)1 on media pluralism and transparency of media ownership** [CoE]
  Provides the bridge from basic media functions to internal and external pluralism in Module 3. **Programme link:** Programme map and core distinctions.
- **Declaration on the role of community media in promoting social cohesion and intercultural dialogue 2009** [CoE]
  Adds community media and local voices to the media ecosystem considered by the module. **Programme link:** Media functions and types.

❖ National adaptation sources

Before delivery, add the applicable constitution, election law, media and audiovisual law, public-service remit, regulator and EMB rules, campaign-finance and political-advertising

rules, data-protection framework, professional codes, relevant court or regulator decisions, and current platform policies. Identify the authority responsible for each decision, referral and appeal route.

❖ **Trainer update and verification note**

Confirm current media categories, platform functions and electoral-period rules. Keep the opening module conceptual and distribute detailed legal or monitoring questions to later modules.

Module 2 Legal and Ethical Framework

This module introduces the legal and ethical standards governing electoral communication, with particular attention to Council of Europe standards and their application in national contexts. It explores the relationship between freedom of expression, editorial independence, media pluralism and the right to free elections. Participants examine the roles of legislation, regulation, co-regulation and professional self-regulation, alongside the responsibilities of different institutions and communication actors. Through practical dilemmas and case analysis, they learn to assess proposed restrictions and remedies against the principles of legality, legitimate aim, necessity and proportionality.

❖ **Official sources**

- **ECtHR case law guides and factsheets on Articles 10 and 3 of Protocol No. 1** [CoE] Use for the legality, legitimate aim, necessity, and proportionality framework. Select case law relevant to the national issue and verify current Grand Chamber developments. **Programme link:** Rights framework and nine-step proportionality analysis.
- **Regulation (EU) 2022/2065 Digital Services Act** [EU-only where applicable] Official source
  Defines due diligence and systemic-risk duties for intermediary services and the supervisory roles of Digital Services Coordinators and the European Commission. **Programme link:** Institutional map and platform-specific regulatory logic.
- **European Commission Guidelines for providers of very large online platforms and very large online search engines on the mitigation of systemic risks for electoral processes 26 March 2024 C(2024) 2121 final OJ C/2024/3014** [EU-only where applicable] Official source
  Practical guidance for VLOPs (Very Large Online Platforms) and VLOSEs (Very Large Online Search Engines) on election-risk assessment and mitigation. Treat as EU

guidance, not a CoE enforcement framework. **Programme link:** Platform proportionality and institutional responsibilities.

- **Regulation (EU) 2024/900 on transparency and targeting of political advertising** [EU-only where applicable] Official source
  Sets EU transparency and targeting requirements and requires national designation and coordination of competent authorities. **Programme link:** Sources of rules and jurisdiction mapping.
- **OSCE/ODIHR Croatia Presidential Election 2009 and 2010 Final Report** [OSCE/ODIHR election report]
  Primary source for the equal-coverage dispute and its effect on editorial independence and voter information. **Programme link:** Croatia exercise and trainer debrief.
- **OSCE/ODIHR Iceland Parliamentary Elections 2013 Final Report** [OSCE/ODIHR election report]
  Optional comparison on regulatory interpretation and media practice. **Programme link:** Optional Iceland exercise.

❖ **National adaptation sources**

Before delivery, add the applicable constitution, election law, media and audiovisual law, public-service remit, regulator and EMB rules, campaign-finance and political-advertising rules, data-protection framework, professional codes, relevant court or regulator decisions, and current platform policies. Identify the authority responsible for each decision, referral and appeal route.

❖ **Trainer update and verification note**

Verify the exact legal basis and current institutional jurisdiction. For every case, separate the regulator's action, the court's review and the practical effect on voter information.

Module 3 Fairness, Pluralism and Equitable Treatment

This module examines what fair election coverage means across different media, formats and national contexts. It explores diversity within individual media outlets and across the wider media environment, and clarifies the distinctions between equality, equity, impartiality and balance. Participants consider access to news, interviews, debates and paid content, including opportunities for smaller, new and independent contestants. Practical exercises address incumbency advantages, editorial choices, prominence and online distribution, helping participants design or assess coverage that provides voters with useful, diverse information while respecting editorial independence.

❖ **Official sources**

- **Recommendation CM/Rec(2018)1 on media pluralism and transparency of media ownership** [CoE]
  Main source for internal and external pluralism and diversity of content. **Programme link:** Pluralism definitions and application.
- **North Macedonia Local Elections 2025 ODIHR Final Report 7 April 2026** [OSCE/ODIHR election report]
  Recent example on access arrangements, editorial coverage and an incident involving sensitive personal data. Use the printed-page locators in trainer guidance. **Programme link:** Access criteria and qualitative fairness.
- **Serbia Local Elections 2 June 2024 ODIHR Final Report** [OSCE/ODIHR election report]
  Supports discussion of institutional social accounts and the limits of interpreting engagement figures. **Programme link:** Incumbency and qualitative fairness.
- **North Macedonia Presidential and Parliamentary Elections 2024 ODIHR Final Report** [OSCE/ODIHR election report]
  Comparison of allocation rules, actual editorial output and audience engagement. **Programme link:** Recent-election comparison cards.
- **Albania Parliamentary Elections 2025 ODIHR Final Report** [OSCE/ODIHR election report]
  Use to distinguish a monitoring referral from a final violation finding and to examine platform restrictions. **Programme link:** Recent-election comparison cards.
- **Bosnia and Herzegovina Local Elections 2024 ODIHR Final Report** [OSCE/ODIHR election report]
  Illustrates how uneven posting and comparatively non-inflammatory content can coexist within a limited sample. **Programme link:** Recent-election comparison cards.
- **EU EOM Kosovo Parliamentary Elections 2025 Final Report** [Optional comparison]
  Optional comparator on image-led online campaigning and policy scrutiny. Apply the UNSCR 1244 status disclaimer exactly as stated in the module. **Programme link:** Optional replacement comparison card.

❖ **National adaptation sources**

Before delivery, add the applicable constitution, election law, media and audiovisual law, public-service remit, regulator and EMB rules, campaign-finance and political-advertising rules, data-protection framework, professional codes, relevant court or regulator decisions, and current platform policies. Identify the authority responsible for each decision, referral and appeal route.

❖ **Trainer update and verification note**

Verify the cited report pages against the primary PDFs. Preserve the Kosovo status disclaimer if that optional comparison is selected.

Module 4 Assessing Media Coverage and Identifying Imbalances

This module develops the practical skills needed to monitor election coverage and produce credible findings. It follows the monitoring process from defining questions and selecting a sample to coding content, checking consistency, interpreting results and reporting conclusions. Participants combine quantitative measures, such as airtime or coverage shares, with qualitative assessment of tone, presentation, sources and context. Exercises cover traditional and digital media and highlight the limitations of different indicators. The module emphasises transparent methods, careful interpretation and recommendations supported by evidence, distinguishing measured imbalances from legal violations or claims about electoral impact.

❖ Official sources

- **OSCE/ODIHR Handbook on Media Monitoring for Election Observation Missions 2012** [OSCE practice] Official source
  The principal reference for sample design, units of analysis, coding, quantitative measures, qualitative assessment and reporting limits. **Programme link:** Sessions on sampling, coding, calculation and evidence-based findings.
- **OSCE/ODIHR Guidelines for Observation of Election Campaigns on Social Networks 2021** [OSCE practice]
  Use for online sampling and transparent limits; do not transplant broadcast airtime measures to personalised feeds. **Programme link:** Online content, behaviour and distribution audit.
- **Council of Europe, Monitoring of media coverage of elections: Toolkit for civil society organisations (2020), authored by Rasťo Kužel** [Official CoE methodology resource]
  Practical methodology for converting standards into monitoring questions, coding fields and reporting products. Published by the Council of Europe for use by civil society organisations. **Programme link:** Method design and quality assurance.
- **Georgia Parliamentary Elections 2024 ODIHR Final Report** [OSCE/ODIHR election report]
  Recent illustration used for coverage share and tone. Verify the precise broadcaster name, figures and report page references against the primary report before publication or delivery. **Programme link:** Recent-election evidence comparison.

❖ National adaptation sources

Before delivery, add the applicable constitution, election law, media and audiovisual law, public-service remit, regulator and EMB rules, campaign-finance and political-advertising rules, data-protection framework, professional codes, relevant court or regulator decisions, and current platform policies. Identify the authority responsible for each decision, referral and appeal route.

❖ **Trainer update and verification note**

Recheck sampling periods, outlet names, figures and denominators. State what the evidence cannot establish and never infer platform exposure from public engagement alone.

Module 5 Disinformation and Information Manipulation

This module examines disinformation and information manipulation during elections. It explores misleading content, narratives, actors, coordinated behaviour, distribution and harm, including generative AI and synthetic media. Participants practise verification, evidence assessment and analytical writing, learning to distinguish observations from judgments and attribution. It covers domestic manipulation and foreign interference, emphasising the evidence needed for attribution. Practical scenarios help participants select timely and proportionate responses that protect electoral integrity and freedom of expression.

❖ **Official sources**

- **Recommendation CM/Rec(2022)13 on the impacts of digital technologies on freedom of expression** [CoE]
  Human-rights framework for digital technologies and safeguards against overbroad responses. **Programme link:** Concepts, safeguards and proportionate response.
- **Recommendation CM/Rec(2022)16 on combating hate speech** [CoE]
  Use to keep hate speech analytically and legally distinct from disinformation while applying contextual assessment. **Programme link:** Working distinctions and harm analysis.
- **EEAS reports on Foreign Information Manipulation and Interference 2024 to 2026** [Official EU institutional source]
  Provides behaviour-focused terminology and threat patterns. A foreign dimension must be supported by evidence and should never be inferred from narrative alignment alone. **Programme link:** FIMI and evidence ladder.
- **Slovak Republic Early Parliamentary Elections 2023 ODIHR Final Report** [OSCE/ODIHR election report]
  Primary source for the manipulated-audio case and the interaction between verification timing and the electoral moratorium. **Programme link:** Slovakia incident room.
- **Romanian Constitutional Court Decision No 32 of 6 December 2024 and European Commission TikTok actions of 5 and 17 December 2024** [National and EU institutional case]
  Use to separate domestic electoral remedies from EU platform supervision and to avoid presenting annulment as a standard response. **Programme link:** Recent-case comparison.

- **Republic of Moldova Presidential Election and Constitutional Referendum 2024 ODIHR Final Report** [OSCE/ODIHR election report]
  Recent primary source for disinformation, manipulation and institutional response in an electoral setting. **Programme link:** Recent-case comparison.
- **Venice Commission Interpretative Declaration on Digital Technologies and Artificial Intelligence CDL-AD(2024)044** [CoE]
  Connects digital technologies and AI to the Code of Good Practice in Electoral Matters. **Programme link:** Generative AI and electoral integrity.
- **Council of Europe Guidance Note on the Implications of Generative Artificial Intelligence for Freedom of Expression (2026)** [CoE current resource]
  Use to assess the implications of generative AI for freedom of expression, information integrity and media pluralism, and to identify appropriate safeguards. **Programme link:** Generative AI session.

❖ **National adaptation sources**

Before delivery, add the applicable constitution, election law, media and audiovisual law, public-service remit, regulator and EMB rules, campaign-finance and political-advertising rules, data-protection framework, professional codes, relevant court or regulator decisions, and current platform policies. Identify the authority responsible for each decision, referral and appeal route.

❖ **Trainer update and verification note**

Update platform features, synthetic-media practice and institutional contacts. Do not attribute coordination, automation, foreign involvement or electoral impact beyond the evidence.

Module 6 Digital Platforms and Political Advertising

This module examines how digital platforms shape electoral communication through advertising, recommendations, moderation and data practices. It explores political advertising and other forms of paid influence, including sponsored creators and content whose commercial or political backing may be unclear. Participants assess sponsorship, financing, targeting, transparency and the responsibilities of actors along the advertising chain. The module distinguishes Council of Europe standards, applicable EU and national rules, and platform policies. Practical exercises develop participants' ability to document online campaigning, recognise evidence gaps and identify appropriate institutional responses.

❖ **Official sources**

- **Regulation (EU) 2024/900 on transparency and targeting of political advertising** [EU-only where applicable] Official source

  Primary EU legal text for political-advertising notices, sponsorship transparency, repositories and targeting. Most provisions apply from 10 October 2025; verify current implementation. **Programme link:** Legal framework, targeting and repository exercises.

- **Regulation (EU) 2022/2065 Digital Services Act** [EU-only where applicable] Official source

  Framework for platform due diligence, transparency and obligations concerning systemic risks to electoral processes. **Programme link:** Platform governance and institutional response.

- **European Commission Guidelines for providers of very large online platforms and very large online search engines on the mitigation of systemic risks for electoral processes 26 March 2024 C(2024) 2121 final OJ C/2024/3014** [EU-only where applicable] Official source

  Operational expectations for VLOPs (Very Large Online Platforms) and VLOSEs (Very Large Online Search Engines) before, during and after elections. **Programme link:** Risk mitigation and recommender systems.

- **Romania 2024 TikTok proceedings and Constitutional Court decision** [National and EU institutional case]

  Demonstrates the separation between platform supervision, evidence preservation and domestic electoral adjudication. **Programme link:** Digital case comparison.

❖ **National adaptation sources**

Before delivery, add the applicable constitution, election law, media and audiovisual law, public-service remit, regulator and EMB rules, campaign-finance and political-advertising rules, data-protection framework, professional codes, relevant court or regulator decisions, and current platform policies. Identify the authority responsible for each decision, referral and appeal route.

❖ **Trainer update and verification note**

Recheck implementation of EU political-advertising rules and the Digital Services Act (DSA), ad repositories, platform policies, targeting rules and supervisory arrangements immediately before delivery.

Module 7 Inclusive and Responsible Coverage

This module explores whether election communication enables all parts of society to receive useful information, contribute to public debate and participate without discrimination or intimidation. It addresses gender equality, minority representation, disability and

accessibility, linguistic and regional inclusion, and the ways different forms of disadvantage can overlap. Participants examine visibility, direct voice, portrayal and stereotyping, alongside gendered disinformation, harassment and threats. Through content analysis, accessibility assessments and practical scenarios, they develop approaches to monitoring and responding to exclusion that protect participation, dignity, safety and freedom of expression.

❖ Official sources

- **Recommendation CM/Rec(2013)1 on gender equality and media** [CoE]
  Core Council of Europe standard for gender equality in media structures, content and practice. **Programme link:** Visibility, portrayal and editorial responsibility.
- **Recommendation CM/Rec(2019)1 on preventing and combating sexism** [CoE]
  Framework for recognising and responding to sexist expression and practices while respecting freedom of expression. **Programme link:** Gendered abuse and response options.
- **Council of Europe Study on media coverage of elections with a specific focus on gender equality 2017** [CoE practice resource]
  Election-specific evidence and practical recommendations for gender-sensitive coverage and monitoring. **Programme link:** Gender and election-coverage monitoring.
- **UN Convention on the Rights of Persons with Disabilities Articles 9, 21 and 29** [Applicable States Parties]
  Binding accessibility and political-participation framework for election information and communication. **Programme link:** Accessibility audit.
- **OSCE/ODIHR Handbook on Observing and Promoting Women's Electoral Participation second edition, 2023** [OSCE practice]
  Current observation guidance on structural barriers, participation and evidence. **Programme link:** Inclusion assessment and audience adaptation.

❖ National adaptation sources

Before delivery, add the applicable constitution, election law, media and audiovisual law, public-service remit, regulator and EMB rules, campaign-finance and political-advertising rules, data-protection framework, professional codes, relevant court or regulator decisions, and current platform policies. Identify the authority responsible for each decision, referral and appeal route.

❖ Trainer update and verification note

Update respectful identity terminology, accessibility practice, referral contacts and safeguarding procedures with affected organisations. Prefer aggregate or fictionalised material where real examples would reproduce harm.

Module 8 Risks, Violations and Practical Case Studies

This module brings together the concepts and skills developed earlier through practical cases involving election coverage, digital campaigning, political advertising, disinformation and pressure on journalists. Participants learn to distinguish warning signs, verified facts, ethical failures, platform-policy breaches and legal violations. They assess evidence, identify the applicable standards and responsible institutions, and consider urgency, affected rights and procedural safeguards. Case exercises and an integrated incident simulation strengthen their ability to formulate supported findings, acknowledge uncertainty and select proportionate remedies within the mandates of the actors concerned.

❖ **Official sources**

- **Recommendation CM/Rec(2016)4 on protection of journalism and safety of journalists and other media actors** [CoE]
  Core standard for prevention, protection, prosecution and promotion of a safe environment for journalism. **Programme link:** Watchdog pressure and safety referrals.
- **Recommendation CM/Rec(2024)2 on countering strategic lawsuits against public participation** [CoE]
  Council of Europe framework for identifying and responding to SLAPPs with procedural and non-legal safeguards. **Programme link:** Defamation pressure and SLAPP analysis.
- **Directive (EU) 2024/1069 on protecting persons who engage in public participation from manifestly unfounded claims or abusive court proceedings** [EU-only where applicable] Official source
  Adds the EU procedural layer for cross-border civil matters. Do not present it as CoE law. **Programme link:** Legal-pressure case and remedy mapping.
- **ECtHR Article 10 defamation case law including Radio France, Artun and Güvener, Colombani, Otegi Mondragon, Tuşalp, and Romanenko and Others** [CoE case law]
  Use selected judgments to distinguish protection of reputation, legitimate criticism and the narrower scope for special protection of public officials or bodies. Verify the facts and current status of every case before use. **Programme link:** Defamation and watchdog-pressure discussion.
- **JUFREX Freedom of Expression Training Handbook** [Official CoE training resource]
  General background for judges and lawyers on Article 10, defamation, internet freedom and journalist safety. It is not an election-case source. **Programme link:** Audience adaptation for legal professionals.

❖ **National adaptation sources**

Before delivery, add the applicable constitution, election law, media and audiovisual law, public-service remit, regulator and EMB rules, campaign-finance and political-advertising

rules, data-protection framework, professional codes, relevant court or regulator decisions, and current platform policies. Identify the authority responsible for each decision, referral and appeal route.

❖ **Trainer update and verification note**

Verify every real case and later procedural development. Keep evidence preservation, urgent protection, regulatory assessment and adjudication institutionally distinct.

Module 9 Good Practices, Response Strategies and Building Resilience

The final module translates the Programme's standards, monitoring methods and case lessons into practical arrangements for preparedness, response and longer-term improvement. Participants develop approaches to risk assessment, institutional coordination, public communication and corrective action while preserving editorial independence and legal safeguards. They practise turning monitoring findings into clear reports and feasible recommendations, assigning responsibilities and identifying when further action is needed. A concluding simulation and action-planning exercise helps participants apply the learning to their own professional settings and strengthen their capacity to anticipate, respond to, and learn from challenges across election cycles.

❖ **Official sources**

- **Venice Commission Revised Interpretative Declaration on the Stability of Electoral Law, CDL-AD(2024)027** [CoE]
  Supports the timing of reforms, legal certainty and careful post-election recommendations. **Programme link:** Reporting recommendations and reform planning.
- **International IDEA Elections during Emergencies and Crises** [Official intergovernmental source] Official source
  Practical framework for comprehensive risk assessment, continuity, contingency planning and post-event learning. **Programme link:** Preparedness and continuity.
- **Council of Europe Media Coverage of Elections 2017** [Official CoE source]
  Consolidated project resource on European legal frameworks and practice. Check later legal developments before relying on jurisdiction-specific details. **Programme link:** Preparedness and good-practice comparison.
- **UNDP Media and Elections guide** [Official UN source]
  Broad practical reference for the relationship between electoral institutions, media and public information. **Programme link:** Preparedness and stakeholder coordination.

❖ **National adaptation sources**

Before delivery, add the applicable constitution, election law, media and audiovisual law, public-service remit, regulator and EMB rules, campaign-finance and political-advertising rules, data-protection framework, professional codes, relevant court or regulator decisions, and current platform policies. Identify the authority responsible for each decision, referral and appeal route.

❖ **Trainer update and verification note**

Update continuity plans, contacts, platform channels and institutional powers. Recommendations should identify the supporting evidence, responsible actor, legal or institutional basis, safeguards, intended result and timetable for review.

VI. Checklist for adapting the training to the national context

Legal framework

☐ Which constitutional and human-rights provisions apply?

☐ Which election, media, advertising, campaign-finance, data-protection and accessibility rules apply?

☐ Which restrictions differ by medium, programme type, actor, election type, or electoral period?

Institutions and remedies

☐ Which bodies can monitor, request evidence, decide, sanction, or hear an appeal?

☐ Where do mandates overlap and where is a referral required?

☐ Which urgent routes exist during voting and counting?

Media and platform environment

☐ Which public service, private, commercial, community, and online editorial services matter for voters?

☐ Which platforms, messaging services, ad systems, creators, and recommender functions matter?

☐ Which groups face barriers related to language, accessibility, connectivity, safety or representation?

Training design

☐ What practical output should participants produce?

☐ Which case best reflects the national dilemma without giving away the answer?

☐ Which materials need translation, simplification, accessibility adaptation, or anonymisation?

Source verification and updating checklist

☐ Open the primary official source and confirm the title, date, legal status, and current version.

☐ Check every quoted figure, date, page, paragraph, and institutional name.

☐ Confirm whether a source is binding law, authoritative institutional guidance, an official monitoring finding, an allegation or a final determination.

☐ Mark EU-only materials and confirm territorial, personal, and temporal scope.

☐ For election reports, state the election date, observation sample, and limits; do not convert a selected finding into a country-wide or current conclusion.

☐ Recheck official platform-supervision guidance, repository availability, researcher-access arrangements and advertising definitions shortly before delivery.

☐ Check that links to the selected materials work. Where possible, download the key documents for use during the training and record the download date.

☐ Record the verification date, trainer initials, and any unresolved issues in the session preparation notes.

☐ Remove outcomes, suggested answers, and trainer cautions from participant copies.

☐ After delivery, record questions that require legal updating or further primary-source checking.

VII. Recommended reading and reference materials

The following section brings together the official standards, institutional guidance, election reports and decisions used across the nine-module Programme. It helps trainers select a small, purposeful reading set for a particular audience and national context.

The guide includes the Council of Europe's *Monitoring of media coverage of elections: Toolkit for civil society organisations* (2020), authored by Rasťo Kužel, as a practical methodological reference for Module 4. As a Council of Europe publication, it is an institutional source.

Source basis: official Council of Europe (CoE), European Court of Human Rights (ECtHR), Venice Commission, European Union, OSCE/ODIHR, United Nations, European External Action Service (EEAS) and International IDEA materials cited in the modules, including the Council of Europe media-monitoring toolkit.

Cross-cutting core standards :

European Convention on Human Rights (ECHR), Article 10, and Protocol No. 1, Article 3
[CoE] Official source
Binding human-rights framework for freedom of expression, the right to receive and impart information, and free elections. Read together when analysing restrictions, positive obligations, and the information voters need to make an informed choice. **Programme link:** Used throughout the Programme; select according to the session objective.

Recommendation CM/Rec(2022)12 on electoral communication and media coverage of election campaigns [CoE] Official source

The principal contemporary Council of Europe standard for the package. It covers the full information environment, including online communication, political advertising, algorithms, moderation, microtargeting, transparency and media coverage. **Programme link:** Used throughout the Programme; select according to the session objective.

Recommendation CM/Rec(2007)15 on measures concerning media coverage of election campaigns [CoE] Official source

Use as the detailed companion on editorial independence, broadcast news, public service media, free airtime, paid advertising, opinion polls, rights of reply and reflection periods. **Programme link:** Used throughout the Programme; select according to the session objective.

Venice Commission Code of Good Practice in Electoral Matters CDL-AD(2002)023rev2-cor [CoE] Official source

Provides the electoral-law baseline, particularly equality of opportunity, stability of electoral law, impartial administration and effective remedies. **Programme link:** Used throughout the Programme; select according to the session objective.

OSCE/ODIHR Handbook on Media Monitoring for Election Observation Missions 2012 [OSCE practice] Official source

Core methodological reference for monitoring design, quantitative and qualitative analysis, and evidence-based election observation. **Programme link:** Used throughout the Programme; select according to the session objective.

OSCE/ODIHR Guidelines for Observation of Election Campaigns on Social Networks 2021 [OSCE practice] Official source

Extends observation practice to online campaigning and helps trainers distinguish observable content and behaviour from inaccessible platform processes. **Programme link:** Used throughout the Programme; select according to the session objective.