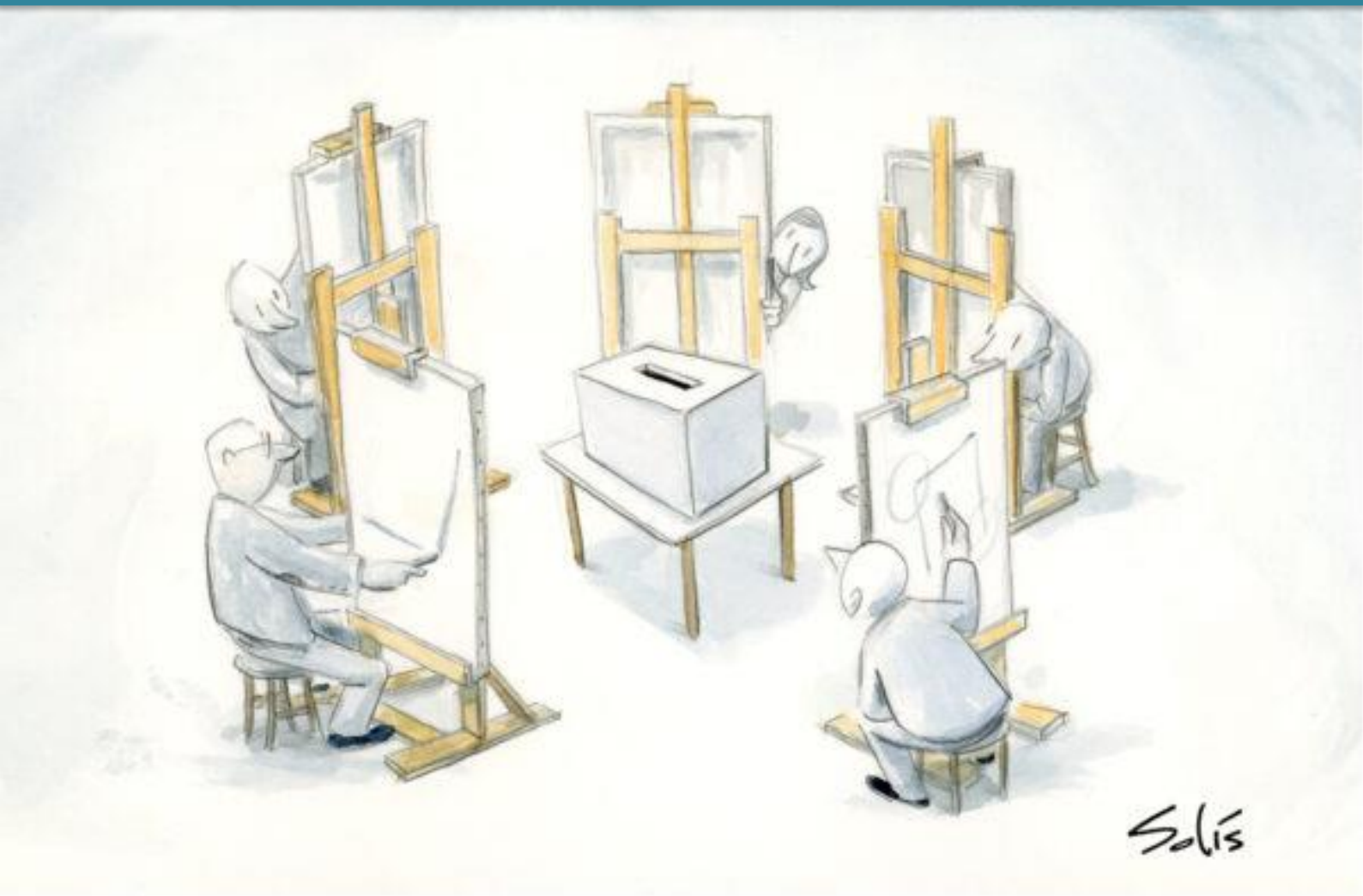
MEDIA COVERAGE OF ELECTIONS

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.

PROGRAMME MODULES

Module 1: Electoral communication and media core concepts

Training material to be shared with trainers only

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Module objective

This opening module establishes the vocabulary and analytical map used throughout the Programme. It introduces the democratic functions of electoral communication without attempting to teach the detailed law, monitoring methodology, platform rules or response protocols developed in later modules. Use the separate participant workbook for activities and keep suggested outcomes in this trainer document.

Enables participants to explain how media and other communication actors shape electoral participation, distinguish the main forms and channels of electoral communication, and analyse a practical situation through the connected rights of voters, political contestants and the media.

Learning outcomes

By the end of the module, participants should be able to:

- describe an election as both a political process and an information event;
- identify the main actors, channels and functions in a hybrid media environment;
- explain the connected interests of voters, candidates and parties, and the media;
- distinguish political communication from electoral communication and editorial content from advertising or other sponsored content;
- distinguish public service, private commercial, community and online media while recognising that duties vary by function and legal context;
- identify how selection, prominence, framing, recommendation and amplification affect visibility;
- map a practical issue to the specialist module that develops the required standard or tool.

Session techniques and methods

One-word opening; information-journey mapping; rights-triangle exercise; actor and function sorting; scenario carousel; paired classification; mini case discussion; personal learning check. The same concepts remain constant, while roles and outputs change according to the audience.

Duration

Condensed route: 75 minutes. Standard route: 120 minutes. Extended route: 180 minutes. Timing includes instructions, group work, reporting and debriefs but excludes breaks, interpretation and preparation.

Relationship to other modules

Module 1 provides the common language for the package. Module 2 develops the legal and ethical framework. Module 3 addresses fairness, pluralism and equitable treatment. Module 4 supplies monitoring methods. Modules 5–7 address manipulation, platforms, advertising and inclusion. Modules 8 and 9 apply the framework to incidents, remedies and resilience.

Preparation and route selection

Trainer checklist

- Ask the commissioning team which audience groups will attend and what decisions they make in practice.
- Prepare a simple national information map: leading broadcasters, public service and community media, major online news providers, widely used platforms and messaging services, relevant institutions and important minority-language channels.

- Verify the national campaign period, silence period if any, official voter-information arrangements and the bodies responsible for media, elections, campaign finance and data protection.
- Select familiar examples from both traditional and online communication. Avoid making the digital environment an appendix to a broadcast-centred session.
- Prepare participant Sheets 1–8 without the suggested outcomes in this document.
- Decide which terms require translation or national explanation. Do not assume that “media”, “platform”, “political advertising” or “campaigning” has the same legal meaning in every country.
- Arrange mixed groups where multidisciplinary exchange is useful. For specialist groups, assign outputs that match their powers and professional role.
- Invite participants to contribute experience, but prevent discussion from becoming a contest over a current party or disputed result.

Route table

1 Elections as information events	10	15	20
2 Rights and responsibilities	15	20	30
3 Media functions and types	10	15	25
4 Hybrid environment	10	20	30
5 Communication across the cycle	10	15	20
6 Core distinctions	10	20	30
7 Risks and opportunities	5	10	15
8 Consolidation	5	5	10

Route guidance and facilitation approach

For 75 minutes, use Sheets 1, 2, 4 and 6, followed by the learning check. For 120 minutes, add Sheets 3, 5 and 7. For 180 minutes, complete all sheets, allow role-specific group reporting and require participants to design a short adaptation for their own audience.

Training of trainers' guidance

Begin with participants' experience. The one-word opening from the supplied ToT materials quickly reveals whether the room associates good electoral communication with accuracy, fairness, freedom, reach, trust or control. Return to these words at the end and ask what has changed.

Use short inputs followed by a task. A useful sequence is: experience, concept, application, reflection. Explain no more theory than participants need to complete the next activity. During debrief, ask for the evidence and perspective behind an answer before adding the relevant standard.

This module-specific guidance should be used together with the package-wide ToT methodology. The common methodology should set the overall approach to adult learning, inclusion, assessment and trainer preparation; each module should retain only the adaptations needed for its subject, audience and exercises.

Ground rules

- Analyse conduct and systems, not the presumed character of political actors.
- Separate a participant's policy preference from the applicable legal rule.
- Treat platform policy, voluntary practice and binding law as different layers.
- Allow disagreement where standards require contextual judgment.
- Do not reproduce harmful content unless it is necessary and safely presented.
- Make participation accessible and ensure that dominant institutions do not crowd out smaller organisations or professional groups.
- Discussion of a specific institution's internal practice in this room should not be attributed outside it without that institution's agreement.

Diagnostic questions

Before the first input, ask participants to answer individually: Who decides what voters see? Does fair coverage mean equal coverage? Is a platform a media outlet? When does political communication become electoral communication? Keep the answers and repeat the questions during the final learning check.

Core messages that should remain constant

- Elections depend on the ability of voters to receive information, compare alternatives and understand how to participate.
- Candidates and parties need a meaningful opportunity to communicate, but access does not create a right to control editorial decisions.
- Media freedom and editorial independence remain essential during elections. Election rules should protect democratic participation without turning public authorities into editors.
- Media perform several functions at once: they inform, explain procedures, provide space for debate, scrutinise power and enable citizens to hear different views.
- The information environment is hybrid. Broadcast, print, online news, search, social platforms, messaging services, creators and campaign channels interact and redistribute one another's content.

- Visibility is shaped by more than airtime. Placement, tone, framing, recommendation systems, paid promotion, engagement and cross-platform amplification also matter.
- Different actors require different rules. Public service media, private broadcasters, community media, online news services, platforms and individual users do not have identical functions or responsibilities.
- Council of Europe standards protect expression while addressing fairness, transparency, pluralism and accountability. CM/Rec(2022)12 updates the electoral framework for online communication and complements CM/Rec(2007)15.
- National context matters. Trainers should identify which standards bind, which guide, who has jurisdiction and what remedies exist.
- Monitoring supports assessment. It does not replace legal interpretation, editorial judgment or proof of electoral impact.

Elections as information events

SESSION METHOD One-word opening and journey map using Sheet 1 | TIME 10, 15 or 20 minutes

An election is a political contest, a legal process and an information event. Voters receive procedural information, competing programmes, records of those in power, journalism, advertising, commentary and interpersonal messages. They encounter these elements through channels whose selection and distribution systems differ.

Information journey

Ask participants to follow one claim from its origin to a voter. A campaign may publish a video. A platform may recommend it. A broadcaster may report the controversy. A messaging group may recirculate an edited clip. A fact-checker may add context. At each stage, the audience, meaning, prominence and evidence can change.

Four practical questions

1. Who produced or materially shaped the communication?
2. What function does it perform: inform, persuade, scrutinise, mobilise, administer or manipulate?
3. How did it reach the voter, including paid or algorithmic amplification?
4. What right, duty or public interest is affected?

Trainer debrief for Sheet 1

Do not accept “social media” as a complete answer to who decided visibility. Distinguish the original speaker, editor, advertiser, recommender system, users who shared the item and any authority that later intervened. Emphasise that the same content can move between private, editorial, campaign and platform-controlled spaces.

Interrelated rights and responsibilities

SESSION METHOD Rights triangle using Sheet 2 | TIME 15, 20 or 30 minutes

Voters

Voters need sufficient, diverse and accurate information to make an informed choice and practical information on how to participate. This includes access to competing views, scrutiny of those seeking office and reliable information about registration, voting, counting and results.

Candidates and political parties

Contestants need freedom to communicate their programmes and a fair opportunity to reach voters without discrimination. Their access can take different forms and does not necessarily require identical treatment in every programme or medium. Contestants should respect editorial independence and should not use political or economic pressure to control coverage.

Media and journalists

Media and journalists need freedom to report, investigate, criticise, select formats and express opinions. This freedom carries professional responsibilities, including accuracy, clear distinctions between editorial and paid content, correction of significant errors and respect for the rights and safety of others.

The organising question

The rights form a connected triangle. A rule that maximises one interest can damage another. Requiring every newsroom to give every candidate identical time may appear equal but can reduce useful journalism and voters' information. Unrestricted editorial discretion can also conceal systematic exclusion. The task is to identify a lawful and proportionate balance in context.

Applying the rights triangle

Scenario

A private broadcaster invites the four parties represented in parliament to a prime-time debate. Six registered parties are excluded but receive interviews in lower-audience programmes. One excluded party demands identical prime-time access. Online creators claim that the format proves election manipulation.

Questions for the trainer

- What information do voters need about the selection criteria and alternatives?
- Does the contestant claim concern equality, equitable opportunity, discrimination or editorial choice?
- Which decisions belong to the broadcaster and which may fall within a regulator's or court's jurisdiction?
- Does the online reaction add evidence or only an assertion?
- Would the analysis change for public service media, a private broadcaster or a platform-hosted debate?

Suggested debrief for Sheet 2

There is no automatic answer without the national framework, broadcaster type, criteria, reach and available alternatives. Transparent, objective and consistently applied criteria strengthen the format. Participants should avoid equating registration with an unconditional entitlement to every programme. They should also examine whether the combined offer provides meaningful opportunity and voter access to diverse choices.

Link forward

Module 2 develops legality and proportionality. Module 3 distinguishes equality from equitable treatment and examines internal and external pluralism. Module 8 applies these concepts to complaints and remedies.

Media functions and media types

SESSION METHOD Function and actor sorting using Sheet 3 | TIME 10, 15 or 25 minutes

Democratic functions

Function	Electoral contribution	Typical risk
Inform and explain	Procedures, choices, context and results	Error, omission or confusing official and campaign roles
Provide debate	Contestants and social groups exchange views	Exclusion, dominance or performative conflict
Scrutinise	Test claims, records, spending and exercise of power	Intimidation, capture or selective scrutiny
Represent society	Bring different communities and experiences into public debate	Stereotyping, token presence or absence of voice
Support accountability	Correct errors and expose violations or institutional failure	Premature legal conclusions or partisan enforcement

Media types

Public service media have a defined public remit and particular responsibilities for universality, pluralism and access. Private commercial media retain editorial freedom while national law may impose election-specific duties, especially on broadcasting. Community media complement public and commercial services and can reach local, minority-language or otherwise underserved communities. Online news services exercise editorial choices, while platforms organise and distribute third-party communication through rules, ranking, recommendation and advertising systems.

Trainer debrief for Sheet 3

Ask groups to classify by function, not only by label. A broadcaster also publishes online; a newspaper may host video; a creator may perform a journalistic function; a platform can influence reach without originating the content. Legal status still matters, but the practical analysis must follow the full communication chain.

Public, private, community and official communication

Public service media

Council of Europe standards treat public service media as a trusted forum for pluralistic debate across services and platforms. Independence, adequate conditions and universal accessibility are essential if the remit is to serve voters rather than government.

Private and community media

Private outlets contribute diversity and scrutiny but operate under different business models and may face ownership, advertising or political pressures. Community media can provide locally relevant and minority-language information that national services miss. Trainers should not treat audience size as the only measure of democratic value.

Official information is not journalism

EMBs and other authorities communicate authoritative procedural facts. They should provide timely, accurate and accessible voter information. Their institutional channels do not replace independent scrutiny, and official communication must distinguish neutral administration from promotion of incumbents.

Government activity and campaigning

During elections, ministers continue to govern and also campaign. Newsrooms and monitors should examine purpose, context, prominence and treatment rather than classifying every official appearance automatically. Detailed coding and assessment belong in Modules 3 and 4.

Optional discussion

Ask which actor the public trusts most for voting procedures, contested political facts and allegations against an institution. The answers often differ. Use this to explain why a resilient information environment needs both authoritative sources and independent verification.

The hybrid information environment

SESSION METHOD Ecosystem map and scenario carousel using Sheet 4 | TIME 10, 20 or 30 minutes

The democratic goals remain familiar, but distribution has changed. Electoral communication now moves between television, radio, print, online news, search engines, video-sharing and social platforms, messaging services, podcasts, creators, campaign databases and interpersonal networks.

From gatekeepers to layered selection

Editors still select and frame news. Platforms add ranking, recommendation, moderation and advertising systems. Campaigns can bypass newsrooms and address selected voters directly. Users redistribute and annotate content. Influencers may combine political advocacy, personal commentary and paid promotion. The resulting visibility comes from several decisions rather than one publisher.

Key concepts

- Reach: the number or range of people who could or did encounter content.
- Prominence: how visible or important the content appears in its setting.
- Engagement: observable interaction such as viewing, sharing, commenting or reacting.
- Recommendation: automated selection or ordering presented to a user.
- Amplification: increased distribution produced by paid, algorithmic, coordinated or user activity.
- Moderation: action under law or platform rules affecting content, accounts or visibility.

Caution

Reach and engagement do not show persuasion or electoral impact. A viral item may attract criticism. A small, closed group may still matter. Use claims about exposure, coordination, automation or effect only at the level supported by evidence.

Applying the hybrid map

One message, several rule systems

An interview broadcast on television may also appear on the broadcaster's website, be clipped by a campaign, promoted as an advertisement, recommended by a platform and shared in a closed messaging group. Different choices and responsibilities arise at each stage.

Questions for each stage

Stage	Ask
Origin	Who created the content, in what capacity and for what stated purpose?
Editorial selection	Who chose the format, participants, headline and context?
Paid distribution	Who paid, who benefited and what transparency applies?
Platform distribution	What ranking, targeting, moderation or archive function is relevant?
User redistribution	Was the item altered, coordinated or moved into a different audience?
Institutional response	Which body has authority and what safeguard protects expression?

Council of Europe orientation

CM/Rec(2011)7 encourages a differentiated understanding of media functions. CM/Rec(2018)2 addresses the roles and responsibilities of internet intermediaries. CM/Rec(2020)1 addresses human-rights risks throughout the lifecycle of algorithmic systems. CM/Rec(2022)12 brings these concerns into electoral communication. CM/Rec(2026)4 adds a current framework on online safety and user empowerment. The specialist modules explain how these standards apply.

Suggested debrief for Sheet 4

Reward maps that show interactions rather than two separate boxes labelled traditional and online. Ask where an intervention would work, who can lawfully take it and whether the message would continue to circulate elsewhere.

Electoral communication across the cycle

SESSION METHOD Timeline exercise using Sheet 5 | TIME 10, 15 or 20 minutes

Political and electoral communication

Political communication concerns political actors, issues and decisions throughout the year. CM/Rec(2022)12 uses electoral communication for political communication related to elections and intended, directly or indirectly, to influence voters' choices. National definitions and regulated periods may be narrower, so trainers should distinguish the analytical concept from the applicable legal definition.

Election-cycle perspective

Period	Communication priorities
Before the formal campaign	Voter registration, media environment, preparedness, early advertising and issue framing
Campaign	Contestant access, journalism, debates, advertising, targeting, manipulation and inclusion

Period	Communication priorities
Silence period where applicable	Scope of restrictions, cross-border and online enforceability, journalism and voter information
Voting and counting	Accurate procedures, safety, secrecy, turnout information and premature result claims
Results and post-election period	Verified results, complaints, peaceful scrutiny, correction, review and reform

Electoral silence

A silence period is a legal tool used in some systems, not a universal democratic requirement. Its scope, subjects and online application vary. Participants should test legality, legitimate aim, proportionality and practical enforceability rather than assume that silence means an information blackout.

Trainer debrief for Sheet 5

Ask which risks begin before the official campaign and continue after election day. This prevents institutions from designing monitoring, contacts or corrective communication too late.

Core distinctions for analysis

SESSION METHOD Paired classification using Sheet 6 | TIME 10, 20 or 30 minutes

Distinctions that prevent analytical errors

Distinction	Why it matters
Political and electoral communication	Not every political message falls within an election-specific legal regime.
Editorial and paid or sponsored content	Different transparency, financing and professional rules may apply.
Official and campaign activity	Incumbency should not create hidden electoral advantage, but government must continue to function.
Equality and equitable treatment	Identical quantities and fair opportunity are related but not interchangeable.
Internal and external pluralism	Diversity may exist within one outlet or across the media environment as a whole.
Observation and assessment	What occurred should remain distinct from its significance under a standard.

Distinction	Why it matters
Platform policy and law	A company rule can be stricter or looser than national legal requirements.
Harmful and unlawful content	Harm does not automatically establish a lawful basis for restriction.

Facilitation instruction

Give pairs short examples and require two answers: the best analytical classification and the additional fact needed before a legal conclusion. Avoid turning the exercise into a vocabulary test. The purpose is to slow down premature judgment.

Borderline examples and common traps

Examples

1. A ministry announces a new benefit during the campaign and the governing party reposts the broadcast clip.

2. A creator praises a candidate without disclosing that an agency paid for the post.

3. A platform reduces distribution under its civic-integrity policy although the content is lawful nationally.

4. A public broadcaster gives equal free airtime but its news overwhelmingly favours incumbents.

5. Several private outlets support the same party while other outlets provide competing views.

6. A false claim causes concern but available evidence does not establish coordination or impact.

Questions

What can be observed? Which classification is plausible? What remains unknown? Which specialist module supplies the next tool?

Suggested debrief for Sheet 6

The ministry example requires evidence about newsworthiness, timing, presentation and whether the official role served as campaign advantage. The creator example raises sponsorship and political-advertising questions. Platform policy and national law require separate analysis. Equal free airtime does not resolve news imbalance. External pluralism may exist despite partisan outlets, but concentration and audience reach matter. A false statement alone does not establish a coordinated manipulation operation or electoral effect.

Link forward

Use Modules 2–7 for the detailed tests. Module 8 teaches the progression from signal and suspected incident to verified fact, analytical finding and legal determination.

Risks, opportunities and first responses

SESSION METHOD Risk and opportunity matrix using Sheet 7 | TIME 5, 10 or 15 minutes

Opportunities

Digital communication can widen participation, help contestants reach voters, support accessible voter information, connect journalists with sources and allow rapid correction. Public service and

community media can use multiple platforms to serve audiences that scheduled broadcasting does not reach.

Risks

The same environment can fragment audiences, obscure sponsorship, reward sensational material, enable intrusive targeting, accelerate false procedural claims and expose journalists or candidates to harassment. Concentrated ownership, political capture and weak local media remain important offline and online.

First-response discipline

At introductory level, ask participants to identify the affected function, evidence, urgency, responsible actor and freedom-of-expression safeguard. Do not ask them to solve every problem in Module 1. The Programme progressively supplies the legal, monitoring, platform, inclusion and response tools.

Suggested debrief for Sheet 7

Reject solutions that rely on one institution controlling all communication. Encourage complementary action within mandates: authoritative information from the EMB, independent reporting and correction by media, lawful supervision by competent authorities, transparent platform processes, and monitoring or outreach by civil society.

Consolidation and Programme map

SESSION METHOD Case routing and learning check using Sheet 8 | TIME 5 or 10 minutes

Programme map

If the problem concerns	Continue with
Legal authority, ethics or proportionality	Module 2
Fairness, pluralism or contestant treatment	Module 3
Evidence, sampling, coding or imbalance	Module 4
Disinformation, narratives or coordinated manipulation	Module 5
Platforms, recommender systems or political advertising	Module 6

If the problem concerns	Continue with
Representation, discrimination, harassment or accessibility	Module 7
Incident classification, violations or remedies	Module 8
Preparedness, communication, reporting or resilience	Module 9

Final learning check

Repeat the four diagnostic questions from preparation. Ask each participant to revise one answer and explain the reason. Then require one sentence completing: “In my role, the most important communication decision I influence is…”

Assessment criteria

Participants meet the introductory objective when they can identify the actors and channels, apply the rights triangle, make the core distinctions without premature legal conclusions and select the correct specialist module for deeper analysis.

Trainer reflection

Record which concepts caused disagreement, which examples worked for the audience and which national terms require adaptation. This note feeds into the ToT methodology and later revision of the package.

Training of trainers guidance and assessment

Module-specific facilitation

Use this module to establish a shared language before testing specialist knowledge. Begin with participants' own understanding of who shapes electoral information, then introduce the rights triangle and hybrid information map. Common misunderstandings include treating all online services as media outlets, equating fairness with identical treatment, and assuming that reach proves influence. Ask participants to revise an opening answer rather than rewarding recall of definitions. In mixed groups, rotate the perspective of the voter, contestant, media actor and competent institution. Keep legal detail for Module 2 and detailed monitoring for Module 4.

Audience-specific application

For regulators and lawyers, use borderline classification and jurisdiction questions. For EMBs, follow the journey of authoritative voter information. For journalists, use editorial choices and official-versus-campaign activity. For civil society and observers, emphasise observable indicators and evidence limits. A successful debrief shows that one communication may involve several actors, functions and rule systems.

Assessment and evaluation

Use the four opening diagnostic questions as the baseline. During Sheets 1–7, check whether participants identify actors and channels, apply all three sides of the rights triangle, distinguish observation from assessment and avoid premature legal conclusions. The final routing task and revised diagnostic answers provide the exit assessment.

Evidence of learning and trainer reflection

Participants meet the objective when they can explain the rights triangle in their own words, map one message across traditional and online channels, correctly apply at least four core distinctions, and select the appropriate specialist module for further analysis. End with one feedback question: Which concept or exercise would need adaptation for your audience? The trainer should record recurring misunderstandings and one change for the next delivery.

Audience adaptation

Audience	Main emphasis	Effective technique	Expected output
Regulators and supervisory authorities	Jurisdiction, differentiated duties and editorial independence	Actor-chain mapping and threshold discussion	Preliminary jurisdiction map
Election management bodies	Authoritative voter information, institutional neutrality and coordination	Information-journey and timeline exercise	Communication responsibility map
Legal professionals and policymakers	Rights triangle, definitions, proportionality and regulatory gaps	Borderline-case classification	Issues list for legal analysis
Journalists and media practitioners	Editorial freedom, formats, verification and official versus campaign activity	Newsroom scenario and peer critique	Editorial decision checklist
Civil society and election observers	Observable indicators, evidence limits, inclusion and referral	Ecosystem mapping and evidence exercise	Monitoring questions and referral map

Mixed groups

Give every group the same case but assign a different role. Ask what the role can decide, what it needs from others and what it must not do. The plenary should reveal dependencies without erasing mandates.

Timing and level

For introductory groups, prioritise the rights triangle, media functions and hybrid map. For experienced professionals, shorten definitions and spend more time on borderline cases. Regulators and lawyers may need legal classifications; journalists benefit from editorial simulations; EMBs need communication timelines; observers need observable indicators and evidence limits.

Suggested allocation for a single-audience 120-minute session

Audience	Redistribution across Sessions 1–8
Regulators and supervisory authorities	10, 25, 15, 20, 10, 25, 10, 5 minutes

Audience	Redistribution across Sessions 1–8
Election management bodies	15, 20, 10, 20, 25, 10, 15, 5 minutes
Legal professionals and policymakers	10, 30, 10, 15, 15, 30, 5, 5 minutes
Journalists and media practitioners	15, 20, 20, 20, 10, 20, 10, 5 minutes
Civil society and election observers	15, 20, 15, 20, 10, 25, 10, 5 minutes

These are starting allocations rather than fixed agendas. In a mixed group, use the standard route table and differentiate the assigned role, evidence and expected output instead of separating participants by profession.

Recommended resources

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

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

3. Council of Europe, Recommendation CM/Rec(2011)7 on a new notion of media.

4. Council of Europe, Recommendation CM/Rec(2018)2 on the roles and responsibilities of internet intermediaries.

5. Council of Europe, Recommendation CM/Rec(2020)1 on the human rights impacts of algorithmic systems.

6. Council of Europe, Recommendation CM/Rec(2026)4 on online safety and empowerment of users and content creators.

7. Council of Europe, Recommendation CM/Rec(2007)3 on the remit of public service media in the information society.

8. Council of Europe, Recommendation CM/Rec(2018)1 on media pluralism and transparency of media ownership.

9. Council of Europe, Declaration on the role of community media in promoting social cohesion and intercultural dialogue, 2009.

10. Council of Europe, Recommendation CM/Rec(2016)4 on the protection of journalism and safety of journalists and other media actors.

11. Council of Europe, Recommendation CM/Rec(2016)5 on Internet freedom.

12. Role of Media During Elections, Electoral Silence Period and the Media, and related Kužel training presentations supplied for this module.

13. Kužel Training of Trainers materials, including the session-design and expectation exercises, 2026.

14. Council of Europe media-monitoring guidelines and toolkit, and the supplied Carver and Mracka methodology resources.

Final trainer note

Check official titles, national law, institutional names and platform functions before delivery. Use this module to establish a shared analytical language, not to compress the remaining Programme into one lecture. Keep examples balanced between traditional and online media and allow participants' professional experience to shape the discussion.

Module 1: Electoral communication and media core concepts

PARTICIPANT EXERCISES

Training material to be shared with participants

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SHEET 3 MEDIA FUNCTIONS AND ACTORS 44

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SHEET 4B ANALYSIS QUESTIONS 45

SHEET 5 ELECTION-CYCLE TIMELINE 45

SHEET 6 CORE DISTINCTIONS 46

SHEET 7 RISK AND OPPORTUNITY MATRIX 46

SHEET 8 PROGRAMME MAP AND LEARNING CHECK 46

PERSONAL APPLICATION CARD 47

These exercises establish the common concepts used across the Programme. They help you follow electoral communication from its source to voters, identify the rights and functions involved, and decide what further analysis a practical problem requires.

Instructions and diagnostic

Working approach

- Base your answer on the information provided and identify what remains unknown.
- Separate what you observe from what you assess.
- Distinguish binding law, institutional practice, professional standards and platform policy.
- Work within your assigned professional role.
- Consider traditional and online communication as one connected environment.

Opening questions

Answer individually before discussion.

1. Who decides what voters see?

2. Does fair coverage mean equal coverage?

3. Is a platform a media outlet?

4. When does political communication become electoral communication?

Keep your answers for Sheet 8.

Sheet 1 Election information journey

Starting message

A candidate posts a short video alleging that a new voting procedure will invalidate some ballots. A platform recommends it widely. A broadcaster reports the controversy using part of the video. A messaging group circulates an edited clip. The EMB publishes an explanation, and a community radio station translates it into a minority language.

Task

Map the message through the following stages:

- original producer and stated purpose;
- editorial selection or alteration;
- paid, algorithmic or user amplification;
- audience reached or missed;
- verification or correction;
- affected electoral right or function.

Questions

Who shaped visibility at each stage? Where did meaning change? Which actor can provide authoritative procedural information? Which actors provide independent scrutiny? What information would you preserve before assessing harm?

Sheet 2 Rights triangle

Scenario

A private broadcaster invites four parliamentary parties to a prime-time debate. Six other registered parties receive interviews in lower-audience programmes. One excluded party demands identical prime-time access. Online creators claim that the format proves election manipulation.

Three perspectives

Analyse the case from each perspective:

1. Voters: information, diversity, clarity and informed choice.

2. Candidates and parties: opportunity to communicate, non-discrimination and reply.

3. Media: editorial freedom, news value, format and professional responsibility.

Decision questions

What facts are missing? Which selection criteria would be defensible? Would your analysis differ for public service media? What belongs to editorial choice, regulatory assessment or judicial review? Propose an arrangement that protects all three perspectives.

Sheet 3 Media functions and actors

Actor cards

Public service broadcaster; private television channel; community radio; online newspaper; search engine; video-sharing platform; messaging service; political party; influencer; EMB; media regulator; civil society monitor.

Task

For each assigned actor identify:

- its main electoral communication function;
- whether it creates, selects, distributes, promotes, verifies or regulates content;
- the audience it can reach;
- one relevant right or responsibility;
- one risk if another actor misunderstands its role.

Sorting question

Which actors may perform more than one function? Which actors exercise editorial control? Which shape reach without creating the original message? Which provide authoritative information but should remain subject to independent scrutiny?

Sheet 4a Hybrid information map

Case

A minister gives a television interview in an official capacity. The broadcaster posts it online. The governing party clips a favourable answer and pays to promote it. Supporters add subtitles and circulate it through messaging groups. A platform attaches an information label. An opposition outlet publishes a critical fact-check.

Map the chain

For each stage record:

1. actor and capacity;

2. content or action;

3. editorial, paid, algorithmic or user distribution;

4. available transparency;

5. audience and accessibility;

6. rule system or professional standard that may apply.

Sheet 4b Analysis questions

1. At what point might official communication become campaign communication?

2. Which actor selected the original interview and its framing?

3. Who paid for distribution and who benefited?

4. Does the platform label establish that the content is unlawful?

5. What can engagement figures show, and what can they not show?

6. Which part of the chain could a media regulator, EMB, campaign-finance authority, platform or newsroom address?

7. What would a civil society monitor record without exceeding the evidence?

Visual instruction

Draw arrows between actors. Mark where meaning, prominence, audience or legal responsibility changes.

Sheet 5 Election-cycle timeline

Task

Place each issue where preparation or response should begin. Some belong in more than one period.

- voter registration information;
- early political advertising;
- debate-selection rules;
- platform and newsroom contacts;
- campaign-finance reporting;
- silence-period guidance where applicable;
- false polling-place information;
- premature result claims;
- accessible result communication;
- complaints and post-election review.

Timeline

Before formal campaign | Campaign | Silence period where applicable | Voting and counting | Results and review

Questions

Which activities begin too late if institutions wait for the formal campaign? Which restrictions require particular caution online? Which communication must remain possible during a silence period?

Sheet 6 Core distinctions

Classify and qualify

For each statement choose the most relevant distinction and identify one missing fact.

1. A ministry announces a benefit during the campaign and the governing party reposts the clip.
2. A creator endorses a candidate after receiving payment through an agency.
3. A platform reduces distribution under its own civic-integrity rule.
4. A public broadcaster gives equal free airtime but its news favours incumbents.
5. Several private outlets support one party, while other outlets provide competing views.
6. A false procedural claim spreads widely, but its origin and effect remain unknown.

Distinctions

Political or electoral communication; editorial or sponsored content; official or campaign activity; equality or equitable treatment; internal or external pluralism; platform policy or law; harmful or unlawful content; observation or assessment.

Output

Write one cautious analytical sentence for two examples. Do not make a legal determination without the necessary rule and facts.

Sheet 7 Risk and opportunity matrix

Scenario

The EMB plans to work with broadcasters, community media, online news services, platforms and creators to improve voter information. Civil society proposes independent monitoring. Journalists are concerned that informal coordination could influence editorial choices.

Matrix

For each proposed cooperation identify:

- democratic opportunity;
- possible risk;
- lead actor;
- safeguard for independence and expression;
- audience that may still be missed;
- indicator that the arrangement worked.

Challenge

Design one measure that improves the reach of reliable voter information without creating a common authority over political content.

Sheet 8 Programme map and learning check

Route each issue

Choose the module that should provide the next tool.

1. Whether an election restriction is lawful and proportionate.
2. Whether treatment of contestants is equitable.
3. How to sample broadcasts and code tone.

4. Whether a campaign shows coordinated manipulation.

5. Whether an advertisement was transparently labelled and targeted.

6. Whether coverage marginalises women, minorities or persons with disabilities.

7. Whether evidence supports a violation and which remedy fits.

8. How institutions prepare, communicate and learn after an incident.

Repeat the opening questions

Review your four answers from page 2. Revise at least one and explain what changed.

Learning check

In one sentence, explain why voters' rights, contestants' rights and media freedom must be analysed together.

Personal application card

My professional role

.....

The most important electoral communication decision I influence

.....

Another actor I depend on and what I need from them

.....

One safeguard that protects independence or rights

.....

One concept I will apply differently

.....

One question for the next specialist module

.....

Module 2: Legal and ethical framework

Training material to be shared with trainers only

CONTENTS

OPENING DILEMMA: SHOULD THE REGULATOR INTERVENE? 5

FUNDAMENTAL RIGHTS FRAMEWORK 5

EUROPEAN STANDARDS AND SOURCES OF RULES 6

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AUDIENCE AND NATIONAL ADAPTATION: ADJUSTING EMPHASIS WITHOUT DUPLICATING THE MODULE 15

COMPLETION: KEY TAKEAWAYS 17

Trainer's overview

Module objective

The objective of this session is to provide participants with a practical understanding of the legal and ethical framework governing electoral communication and media coverage of elections. It examines how freedom of expression, media freedom and editorial independence interact with the right to free elections and the need to protect fairness and electoral integrity.

The module introduces the principal Council of Europe standards and helps participants translate them into proportionate national rules, regulatory decisions, professional practices and remedies. It does not prescribe a single model. The appropriate balance between legislation, regulation, co-regulation and self-regulation depends on the national context, the independence and reach of different media services, and the risks identified in a particular election.

> **CENTRAL MESSAGE**
>
> The central challenge is to protect fairness and meaningful opportunities for electoral contestants without unnecessarily restricting editorial independence or reducing the information available to voters.

Standards anchor

The principal framework for this module is Recommendation CM/Rec(2022)12, which updates Council of Europe standards for electoral communication across traditional media, online media and digital platforms. It is complemented by Recommendation CM/Rec(2007)15 and its Explanatory Memorandum, which specifically emphasise the need to balance editorial independence with appropriate rules safeguarding fairness, while the OSCE/ODIHR Handbook provides practical guidance for applying this balance without unnecessarily restricting editorial freedom.

Learning outcomes

- Identify the principal European legal and ethical standards applicable to electoral communication and media coverage of elections.
- Explain the relationship between freedom of expression, media pluralism and the right to free elections.
- Distinguish legislation, statutory regulation, co-regulation and professional self-regulation, and assess the appropriate role of each.
- Identify the responsibilities of public authorities, regulators, election management bodies, media, journalists, political actors, platforms and civil society.
- Apply legality, legitimate aim, necessity and proportionality when considering restrictions or regulatory responses.
- Recognise the principal ethical standards for election reporting and identify areas requiring national adaptation.

Session techniques and methods

- Introductory knowledge mapping and dilemma-based voting
- Short interactive presentations
- Standards and stakeholder mapping
- Small-group case analysis
- Facilitated plenary discussion
- National-context reflection

Indicative duration

Core version: 85 - 90 minutes. Extended version: 110 - 120 minutes. For a condensed 75-minute pathway, use the opening dilemma, shortened fundamental-rights and standards inputs, the proportionality framework, ethical synthesis and the 15-minute Croatia exercise. Provide the regulatory-architecture and roles tables as pre-reading, and omit the Iceland comparison, contemporary extensions and fuller stakeholder exercise.

Trainer preparation and scope

Before the session

TRAINER CHECKLIST

Identify the constitutional, electoral, media and administrative rules applicable in the country concerned.

Map jurisdiction separately for public service media, private broadcasters, online editorial media, online platforms, political advertising and personal-data targeting. In EU contexts, identify the Digital Services Coordinator, the authorities designated under Regulation (EU) 2024/900, the relevant data-protection authority and matters falling to the European Commission for VLOPs and VLOSEs.

Select one recent national example involving editorial independence, equality, access, political advertising or a regulatory remedy.

Prepare or distribute the separate participant exercise handout containing only the Croatia scenario, task and questions. If the Iceland comparison is used, include its scenario, task and questions as an optional second exercise. Do not share the outcomes, trainer debrief, trainer cautions or suggested answers with participants before the exercise has been completed.

Decide whether the Iceland comparison is useful for the audience and available time.

Scope and links with other modules

Module 2 establishes the legal and ethical architecture. It introduces fairness, equality, political advertising, disinformation, inclusion and monitoring only to the extent necessary to explain the framework. Their detailed application belongs in the later thematic modules. For EU member States, this module should identify the institutional layer created by the Digital Services Act and Regulation (EU) 2024/900, while leaving their detailed platform and political-advertising obligations to Module 6. Trainers should resist turning this session into a survey of every national rule.

Core messages that should remain constant

- Freedom of political expression and media freedom are starting points, not obstacles to electoral integrity.
- Fair elections require voters to receive sufficient, diverse and reliable information and contestants to have meaningful opportunities to communicate.
- Editorial independence does not remove all responsibilities, but restrictions must be clear, necessary, proportionate and independently administered.
- Formal equality is not always substantive fairness; identical treatment may sometimes reduce useful information.
- Different programme types and media categories may justify different obligations.
- Online editorial media, online platforms and VLOPs/VLOSEs are not interchangeable categories; the applicable duties and competent institutions must be mapped separately.
- Effective regulation requires an independent institution, fair procedures, timely decisions and proportionate remedies.

Opening dilemma: Should the regulator intervene?

SESSION METHOD *Individual vote followed by facilitated discussion* | **TIME** *8–10 minutes*

> **GUIDANCE FOR TRAINERS**
>
> Read the scenario aloud or display it. Ask participants to vote: no action, informal guidance, warning, corrective measure, sanction, or insufficient information.
>
> Do not resolve the case immediately. Record the reasons given and return to them after the proportionality section.

Scenario

A private television channel invites only the leading candidates to a prime-time debate. The law requires equal treatment of election candidates but does not explain whether this means identical airtime in every programme. Excluded candidates complain to both the election commission and the media regulator. The broadcaster argues that a debate involving every candidate would be unmanageable and less useful to voters.

Opening questions

- What interest is the rule intended to protect?
- Does equal treatment mean identical treatment?
- Does it matter that the broadcaster is private?
- What additional facts would you need before deciding?
- What is the least restrictive response capable of addressing the problem?

Fundamental rights framework

Freedom of expression and the right to free elections

SESSION METHOD *Interactive presentation* | **TIME** *12–15 minutes*

Election periods do not suspend freedom of expression. Political speech, public-interest journalism and open debate receive particularly strong protection. At the same time, free elections depend on conditions in which voters can form opinions without undue pressure and can obtain sufficient information about choices before them.

Article 10 of the European Convention on Human Rights protects the freedom to hold opinions and to receive and impart information and ideas without interference by public authority. Article 3 of Protocol No. 1 requires States to hold free elections under conditions ensuring the free expression of the opinion of the people. In electoral communication, these guarantees should be read together rather than treated as competing silos.

The State must refrain from arbitrary interference, but it may also need to establish safeguards supporting pluralism, media independence, meaningful political competition and effective remedies. Any intervention must remain compatible with the Convention and must not be used to shield authorities or incumbents from criticism.

Inter-related rights and responsibilities

Electoral communication involves three inter-related sets of rights and responsibilities. Voters have the right to receive sufficient, diverse and reliable information enabling them to form opinions freely and make an informed electoral choice. Candidates and political parties have the right to communicate their programmes and views to the electorate and to enjoy meaningful opportunities for media access under fair and non-discriminatory conditions. The media have the freedom to report on election campaigns, scrutinise political actors, select editorial formats and express opinions

without unjustified interference. These freedoms are accompanied by responsibilities relating to accuracy, fairness, transparency and respect for the rights of others.

These interests are mutually reinforcing but may also create tensions. A contestant's entitlement to meaningful access does not necessarily confer a right to appear in every programme or to receive identical coverage. Similarly, editorial independence does not permit arbitrary exclusion, concealed discrimination or disregard for applicable public-service and electoral obligations. The appropriate balance depends on the type of media service, the programme format, the applicable legal framework and the effect of the arrangement on pluralism and voters' ability to make an informed choice.

TRAINER PROMPT

Ask participants to name one situation in which the State should refrain from intervention and one in which failure to act could undermine a free election.

European standards and sources of rules

From binding rights to practical guidance

SESSION METHOD *Standards mapping* | **TIME** *12–15 minutes*

Participants should understand the status and function of each source. The European Convention creates binding obligations for States. European Court of Human Rights case law interprets those obligations. Committee of Ministers recommendations and Venice Commission guidance are not treaties, but provide authoritative standards for legislation, policy and practice.

The framework should cover the entire information environment while recognising differences between public service media, private broadcasters, print and online media, platforms and political actors. Rules should be reviewed regularly and developed in consultation with relevant stakeholders.

Why platforms require a different regulatory logic

The regulatory dilemma presented by online platforms is structurally different from that associated with broadcasting, rather than simply a larger version of it. Broadcast regulation generally addresses identifiable editorial decisions, such as whom to interview, whom to invite to a debate or whether to grant a right of reply, which may be assessed and corrected through relatively direct and timely remedies. Very large online platforms and video-sharing services influence electoral communication through recommender systems, content moderation at scale, political-advertising infrastructure and algorithmic amplification. These processes cannot normally be reduced to a single editorial act or corrected solely through a warning or right of reply.

Recommendation CM/Rec(2022)12 complements Recommendation CM/Rec(2007)15 by extending the relevant principles to the contemporary digital environment. It preserves editorial independence alongside the equal and fair treatment of political contestants, while providing that restrictions imposed by internet intermediaries should be applied transparently and without discrimination, using the least restrictive technical means possible. In applicable EU contexts, Articles 34 and 35 of the Digital Services Act translate this approach into systemic-risk assessment and mitigation duties for very large online platforms and search engines. The emphasis is therefore placed on due diligence, transparency, proportionality and the design of platform systems rather than on imposing broadcaster-style equal-time requirements on personalised information environments.

This module introduces this distinction only as part of the legal and institutional framework. Detailed treatment of platform risk assessments, recommender systems, political-advertising repositories, targeting and content-moderation practices belongs in Module 6.

Source	Practical relevance
European Convention on Human Rights	Article 10 protects expression and information; Article 3 of Protocol No. 1 protects free elections; Article 8 may be engaged by privacy and data use.
ECtHR case law	Explains legality, legitimate aims, necessity, proportionality, pluralism, political speech and safeguards against arbitrary interference.
CM/Rec(2022)12	Current overarching Council of Europe framework for electoral communication, including online advertising, financing, algorithms, moderation, microtargeting and media coverage.
CM/Rec(2007)15	Core principles for media coverage of election campaigns, including editorial independence, news, public service media, free airtime, advertising, polls, reply and reflection periods.
EU Digital Services Act (EU contexts)	Allocates platform oversight between national Digital Services Coordinators and the European Commission; VLOPs and VLOSEs are subject to enhanced due-diligence and systemic-risk obligations.
Regulation (EU) 2024/900 (TTPA)	For EU contexts, establishes transparency and targeting rules for political advertising and requires the designation and coordination of competent national authorities. Most provisions apply from 10 October 2025.
Venice Commission standards	Connect free suffrage with respect for fundamental rights, impartial election administration, stability of electoral law and effective appeal.
National framework	Constitution, election and media laws, regulator rules, public-service remit, campaign-finance rules, data protection, codes and jurisprudence.

Regulatory architecture: Choosing the appropriate instrument

SESSION METHOD *Instrument-matching exercise* | **TIME** *10–12 minutes*

Not every problem requires a new prohibition or sanction. The appropriate instrument depends on the harm, the actor involved, the reach and influence of the service, the urgency of the election timetable and the availability of less restrictive measures.

Instrument	Appropriate use
Legislation	Clear rights, duties, institutional mandates, minimum safeguards, transparency obligations, serious violations and remedies.

Instrument	Appropriate use
Independent regulation	Detailed rules, monitoring, guidance, complaints, corrective action and proportionate enforcement, especially for audiovisual media.
Co-regulation	Shared standards or oversight where industry participation and public accountability can be combined.
Self-regulation	Professional ethics, accuracy, correction, complaints, editorial independence and standards developed by media and journalists.
Internal editorial policies	Programme formats, verification, conflicts of interest, labelling, polls, social-media use and handling of candidate requests.
Non-restrictive responses	Guidance, dialogue, transparency, fact-checking, voter information, media literacy and rapid clarification.

Roles and responsibilities: Who should do what?

SESSION METHOD Stakeholder mapping and mandate discussion | **TIME** 10–12 minutes

Stakeholder	Core responsibilities
Government and legislature	Create a clear, rights-compliant framework; protect media freedom and safety; avoid interference; ensure institutional independence and adequate resources.
Media regulators	Act independently and impartially; issue clear guidance; monitor where mandated; decide complaints promptly; explain decisions; use proportionate remedies.
Election management bodies	Provide accurate and equal access to official information; clarify procedures; refer media matters to the competent authority; avoid jurisdictional overlap.
Courts and legal professionals	Provide timely and effective review; protect due process; interpret restrictions narrowly and consistently with human rights.
Public service media	Ensure independent, pluralistic and accessible election coverage; provide meaningful opportunities for contestants; serve voters' information needs.
Private media and journalists	Exercise editorial freedom responsibly; follow law and ethics; distinguish journalism from paid content; correct significant errors.
Political actors	Respect the rules; disclose sponsorship and spending; avoid intimidation, manipulation and misuse of public resources.

Stakeholder	Core responsibilities
Online platforms	Comply with applicable platform, advertising and data rules; provide transparency and accountability in advertising, curation and moderation; cooperate with competent authorities under clear safeguards.
Digital Services Coordinators (EU)	Coordinate national DSA enforcement and supervise intermediary services within their competence; receive complaints and cooperate with other DSCs, the European Board for Digital Services and the European Commission.
European Commission (EU VLOPs/VLOSEs)	Supervise the enhanced DSA due-diligence and systemic-risk obligations of designated VLOPs and VLOSEs; share competence with national authorities for other DSA obligations.
TTPA and data-protection authorities (EU)	Enforce the political-advertising transparency and targeting rules allocated under national designation; coordinate when a case engages advertising transparency, platform duties and personal-data processing.
Civil society and observers	Monitor implementation, document trends, inform the public and contribute evidence without assuming the regulator's adjudicative role.

Institutional independence

The body overseeing election-related media rules should be independent, trusted, competent and adequately resourced. Appointment procedures should be transparent and protect members against arbitrary removal. Decisions and supporting reasons should be public, subject to fair procedures and capable of timely review. The authority should be able to act promptly on complaints and, where its mandate allows, on violations detected independently.

PRACTICAL WARNING

Overlapping mandates between an election commission, media regulator, Digital Services Coordinator, authority designated under Regulation (EU) 2024/900, data-protection authority, European Commission and courts can cause contradictory decisions or delay. National adaptation should identify who leads, who supports and how cases are referred.

Applying restrictions: Legality, necessity and proportionality

SESSION METHOD *Decision framework* | **TIME** *12–15 minutes*

Before restricting electoral communication or directing a media outlet, the competent body should answer the following questions. A politically desirable outcome is not enough; the intervention must be legally and evidentially justified.

1. Legal basis: Is the rule accessible, sufficiently clear and foreseeable? Does the body have jurisdiction?
2. Legitimate aim: Which right or electoral interest is being protected?
3. Evidence and risk: What happened, what harm is reasonably likely, and how serious or urgent is it?

4. Suitability: Is the proposed measure capable of addressing the identified risk?
5. Necessity: Is a less restrictive but effective response available?
6. Balancing: What is the effect on political expression, editorial independence, pluralism and voters' access to information?
7. Differentiation: Does the programme type, media category, audience reach or public-service role justify a different obligation?
8. Procedure: Was the actor heard? Is the decision independent, reasoned, timely and reviewable?
9. Remedy: Is the response proportionate, practical during the campaign and directed at correcting the problem rather than punishing criticism?

KEY DISTINCTION

Equal treatment does not automatically require identical treatment. The relevant question is whether contestants receive fair and meaningful opportunities under clear and impartial criteria, while voters receive useful and pluralistic information.

Ethical framework: Professional responsibility beyond minimum legal compliance

SESSION METHOD *Facilitated synthesis* | **TIME** *8–10 minutes*

Law establishes minimum requirements. Ethical standards guide choices that legislation cannot sensibly regulate in detail. They are particularly important in newsrooms, online publishing and rapidly developing campaign situations.

- Accuracy and verification: verify significant claims and represent sources faithfully.
- Independence: disclose and manage political, financial and personal conflicts of interest.
- Fairness: provide relevant actors with a meaningful opportunity to respond; do not confuse fairness with mechanical neutrality.
- Transparency: distinguish editorial content, opinion, sponsored content and political advertising; disclose relevant methodology and sponsorship.
- Accountability: correct significant inaccuracies promptly and provide accessible complaints or response mechanisms.
- Responsible presentation: avoid manipulative editing, misleading headlines, decontextualised images and inflammatory framing.
- Respect for dignity, privacy and non-discrimination: report on candidates and communities without harassment, stereotypes or irrelevant intrusion.
- Service to voters: prioritise information that helps audiences understand choices, policies, records, procedures and consequences.

Ethical questions for newsrooms

- Why is this story, candidate or issue being selected?
- Are the criteria applied consistently and explainable?
- What relevant voice or fact is missing?
- Could the format mislead even if every individual statement is accurate?
- Is the audience clearly informed about who paid for or produced the content?

Equality and equity: the analytical distinction

For the purposes of the exercise, equality means giving each party or candidate the same amount of time or space. Equity means allocating access proportionally according to clear, reasonable and uniformly applied criteria. Neither formula is automatically correct in every setting. Strict equality may be appropriate for designated free airtime or where few contestants participate; an equitable model

may be more useful for editorial formats or crowded contests, provided significant viewpoints are heard and meaningful access is preserved.

TRAINER TRANSITION

Ask participants to identify whether the rule in the Croatia scenario requires equality, equity or merely fair and meaningful opportunity. Do not allow the terms to be used interchangeably.

Practical exercise: Croatia 2009-2010: equal treatment and editorial independence

SESSION METHOD *Small-group case analysis and plenary debrief* | **TIME** *20-25 minutes; 15-minute core version*

PARTICIPANT MATERIAL

Distribute the separate participant handout for this exercise. It reproduces the scenario, task and questions but excludes the outcome, debrief messages and trainer cautions presented below. Trainers should keep the following pages for their own use and should not display or distribute them until the participant discussion has concluded.

GUIDANCE FOR TRAINERS

Distribute the scenario without the outcome. Allocate groups to advise the regulator, broadcaster, excluded candidates, journalists' association or election observers. Require every proposed response to pass the proportionality test.

Scenario

Twelve candidates are contesting a presidential election. The election law requires the media to provide candidates with equal coverage and the same conditions of access. The public service broadcaster provides designated free airtime and organises debates involving all candidates.

A private television channel divides candidates into two groups using public opinion polls. It gives greater news coverage to the first group but offers separate debate programmes to both groups. Five candidates from the first group participate and one declines. Several candidates assigned to the second group complain of unequal treatment and decide not to participate in their debate.

The media regulator warns the broadcaster that it must treat all candidates equally. A journalists' association argues that dividing candidates into groups is necessary to produce informative and engaging programmes for voters.

Task

Advise the competent authority. Decide whether the broadcaster's approach complied with the applicable principles and what, if any, response would be lawful, necessary and proportionate.

SHORT EXTENSION PROMPT

A regional broadcaster stops covering the election entirely because it believes that giving identical news coverage to all twelve candidates is impracticable and fears breaching the law. Was the principal failure in the rule, its interpretation and enforcement, or the broadcaster's response?

Questions for discussion

1. What legitimate objective was the equal-coverage requirement intended to protect?
2. Does equal treatment require identical airtime for every candidate?
3. Should the same standard apply to news, interviews, debates and designated free airtime?
4. Should public service and private media have identical obligations?
5. Were opinion polls an appropriate basis for dividing candidates?
6. Were the criteria clear, objective, transparent and established in advance?
7. What effect could the restrictive interpretation have on voters' access to information?
8. What less restrictive response could address the candidates' concerns?
9. What remedy would protect both meaningful access and editorial independence?
10. Would the answer change if the smaller candidates were excluded entirely?

Croatia exercise: trainer debrief

Outcome and learning points

In the 2009-2010 Croatian presidential election, the State Election Commission and the Council for Electronic Media interpreted equal coverage restrictively. Regulatory bodies maintained that interviewing one candidate required equivalent airtime for all other candidates. The Council warned TV Nova following a complaint. TV Nova subsequently cancelled the second debate programme. The Croatian Association of Journalists criticised the intervention as interference with editorial policy.

The wider effect is important. According to the observation report, a regional television station decided not to provide election news because it could not realistically give identical treatment to all twelve candidates. A rule intended to expand electoral information therefore risked reducing it.

DEBRIEF MESSAGES

Equality provisions should be interpreted in light of their purpose, programme type and effect on voters.

Guaranteed access formats can be subject to stricter allocation rules than ordinary editorial news coverage.

Private media may retain wider editorial discretion than public service media, while remaining subject to transparent and non-discriminatory criteria.

A warning or sanction is not automatically proportionate merely because unequal airtime is demonstrated.

The regulator should consider corrective options that preserve useful coverage, such as transparent criteria, additional opportunities, a right of response or an alternative format.

Trainer caution

The case should not be used to argue that broadcasters may simply ignore smaller contestants. The analytical question is whether differentiated treatment was based on reasonable, transparent criteria and whether meaningful alternative access existed. Nor should restrictive over-interpretation be presented as the only regulatory risk: failure to monitor or enforce the rules, hidden bias and formally equal but qualitatively unequal coverage may be equally damaging. Detailed models of equal and equitable treatment are developed in Module 3.

Optional comparison - Iceland 2013: inclusion, usefulness and editorial choice

SESSION METHOD *Comparative plenary or second group exercise* | **TIME** *10–15 minutes*

PARTICIPANT MATERIAL

If this optional comparison is used as a separate exercise, distribute the Iceland section of the participant handout without the trainer's matched-pair method, contemporary extensions or other interpretative guidance.

Fifteen party lists contested the Icelandic parliamentary elections. Public service broadcaster RÚV sought to provide equal opportunities through constituency debates, party-leader debates and interviews. Some stakeholders nevertheless considered the debates overcrowded and insufficiently useful for comparing contestants, while election coverage in regular news remained limited.

Private Channel 2 concentrated on six parties polling above five per cent and organised separate debates for smaller parties. The two broadcasters therefore used different models: broad formal inclusion and poll-based editorial selection supplemented by alternative access.

MATCHED-PAIR METHOD

Present Croatia as a state-enforced restrictive interpretation and Iceland as a good-faith editorial or self-regulatory choice. The common mechanism is mechanical equality; the institutional source and available remedy are different.

Comparative questions

- Would the Croatian interpretation of equality improve or weaken coverage in a fifteen-party election?
- Which criteria may legitimately determine access to debates, interviews, news and free airtime?
- How should meaningful access be assessed when a programme cannot accommodate everyone effectively?
- Which obligations should differ between public service and private media?
- What evidence would show whether voters were better informed?

Optional contemporary extension

Georgia's 2024 parliamentary election provides a more recent example for an extended session. ODIHR reported that narrow interpretation of restrictive campaign provisions by the media regulator and courts led to sanctions against broadcasters and limited opposition parties' ability to campaign in the media. Use this only after checking the relevant national provisions and decisions; the example also involved wider problems of political bias and non-compliance, so it should not be reduced to a simple editorial-independence narrative.

Platform comparison: Romania and YouTube

For a contrasting platform example, trainers may use Romania and YouTube as discussion prompts. During Romania's 2024 presidential election, the European Commission issued TikTok a Digital Services Act data-retention order on 5 December; the Romanian Constitutional Court annulled the first round on 6 December; and the Commission opened formal DSA proceedings on 17 December concerning suspected failures to assess and mitigate election risks associated with recommender systems, political advertising and paid political content. The opening of formal proceedings did not constitute a finding that TikTok had violated the DSA.

By contrast, YouTube announced in June 2023 that it would stop removing certain false claims about past United States presidential elections. The platform reasoned that removing such content could restrict political speech without meaningfully reducing the risk of real-world harm. The two examples expose opposite sides of the regulatory dilemma: intervention may come too late to prevent systemic electoral harm, while overly restrictive moderation may unnecessarily limit political expression.

Platform dilemma - trainer prompt

Ask participants why a warning or right of reply may work for an individual broadcast programme but not for a recommender system. What proportionate and graduated measures could be used before election-related harm becomes irreversible? Could these include changes to recommender systems, increased transparency, political-advertising labels, restrictions on monetisation, preservation of relevant data or improved access for researchers and competent authorities? Finally, should a platform's own free-expression rationale receive the same weight as the editorial independence of a journalistic media outlet?

Training of trainers' guidance and assessment

Module-specific facilitation

Present legal standards as tools for resolving practical conflicts, not as a sequence of instruments to memorise. Begin with a dilemma and ask participants to identify the competing rights, legal basis, competent body and possible remedy before showing the proportionality framework. Common misunderstandings include treating equality as automatic identical airtime, assuming that harmful content is necessarily unlawful, and applying broadcast duties directly to platforms. Keep the distinction between Council of Europe standards, applicable EU law, national law, professional ethics and platform policy visible throughout.

Audience-specific application

Regulators should decide a complaint and justify a proportionate remedy. Judges and lawyers should test legality, necessity, procedural safeguards and review. Policymakers should redraft an ambiguous rule. Journalists should defend a workable editorial format. EMBs, observers and civil society should assess the effect on voters and electoral participation. In mixed groups, use the Croatia case with separate roles and require each group to state the limit of its authority.

Assessment and evaluation

Use the opening intervention dilemma as the entry diagnostic. Assess the participant's reasoning during the proportionality exercise and Croatia case, including whether the answer identifies the applicable rule, legitimate aim, evidence, less restrictive alternative and procedural safeguard. Use the key-takeaway task as the exit check.

Evidence of learning and trainer reflection

Participants meet the objective when they can distinguish law from ethics and platform policy, identify the competent actor, apply the proportionality sequence, and propose a remedy that protects voters without unnecessarily restricting editorial independence. Ask participants which step in their reasoning remained most uncertain. Trainers should note any national rule that requires verification before reuse.

Audience and national adaptation: Adjusting emphasis without duplicating the module

How to adapt the module

The module's core principles, learning outcomes and central case study should remain consistent across audiences. Adaptation should concern the emphasis, level of detail, questions posed, roles allocated and expected outputs - not the underlying standards. Trainers should select the professional perspective most relevant to the participants and use the same case to practise the decisions they would encounter in their own work. In mixed groups, participants should be assigned different stakeholder roles and required to negotiate a coordinated response.

Adapting training techniques

Training techniques should reflect the professional tasks participants perform in practice. Regulators should practise reaching and explaining proportionate decisions; judges and legal professionals should practise structured legal reasoning and review; policymakers should test the design and consequences of rules; journalists should make defensible editorial decisions under realistic time constraints; and civil society organisations and observers should distinguish evidence, assessment and advocacy. The same scenario may therefore be retained across audiences, but the participant's role, task, working method and expected output should change.

Audience	Recommended emphasis	Recommended training techniques
Media regulators	Emphasise jurisdiction, institutional independence, monitoring, reasoned decisions and proportionate remedies. Use the Croatia case as a mock regulatory decision in which participants determine jurisdiction, assess the evidence and draft the operative part of a decision.	Mock regulatory hearing; analysis of a complaint file; drafting a short decision; proportionality ladder; institutional-mandate mapping; peer review of proposed remedies.
Election management bodies	Emphasise mandate boundaries, official voter information, referrals and coordination with media regulators and other competent authorities. Use an institutional-mapping exercise resulting in a referral or coordination protocol.	Mandate-mapping exercise; election-day coordination simulation; referral-pathway design; response to a hypothetical candidate complaint; preparation of an inter-agency protocol.
Legal professionals and policymakers	Emphasise convention compatibility, legal certainty, differentiated obligations, proportionality, appeals and institutional design. Ask participants to review or redraft a legal provision and test it against the Croatia scenario.	Moot court or structured case hearing; comparative case-law analysis; legality and proportionality test; judgment-reasoning exercise; review of a disputed legal provision.
Journalists and media practitioners	Emphasise editorial independence, selection criteria, public/private distinctions, accuracy, fairness, labelling and complaints. Use a newsroom exercise in which participants design a workable debate or coverage format and explain their editorial criteria.	Newsroom simulation under time pressure; editorial conference; design of a candidate debate; headline or story-framing exercise; role-play between an editor and an excluded candidate; development of transparent editorial criteria.
Civil society and observers	Emphasise evidence, monitoring methodology, documentation, reporting and assessment of remedies. Ask participants to identify observable indicators, assess the effect on voters and formulate evidence-based findings without assuming the regulator's adjudicative role.	Monitoring-data interpretation; evidence-versus-assumption exercise; drafting an observation finding; stakeholder mapping; assessment of a complaint or remedy from the voter's perspective; development of monitoring indicators.

Where time is limited, trainers should adapt the perspective and exercise output rather than remove the fundamental-rights framework, proportionality test or distinction between equality and equity.

Using one case with different audiences

The Croatia case may be adapted by changing the professional role, task and expected output while retaining the same facts and underlying standards:

- Media regulators: decide the complaint, provide reasons and select a proportionate remedy.
- Judges: review the regulator's intervention for legality, procedural fairness, necessity and proportionality.
- Lawyers: represent the broadcaster, excluded candidates or regulatory authority and present arguments based on the applicable rights and standards.
- Policymakers and legislative drafters: identify the ambiguity in the "equal coverage" requirement and propose clearer wording that protects fairness without imposing mechanical equality.
- Journalists and editors: construct a workable debate and coverage format, establish transparent selection criteria and explain how excluded candidates would receive meaningful alternative access.
- Civil society organisations and election observers: assess the effects on pluralism, contestants' opportunities and voters' access to information, distinguish facts from conclusions and formulate an evidence-based finding.

For a mixed group, assign these roles to different teams and conclude with a simulated hearing or coordination meeting. Participants should compare the different mandates, identify areas of conflict or overlap and seek a response that protects fairness, editorial independence and informed voter choice.

National adaptation checklist

- Which constitutional and statutory rights govern electoral expression and media freedom?
- Which rules apply to public service media, private broadcasters, online editorial media, social-media platforms and other intermediary services?
- What do equal, equitable, balanced, impartial or fair coverage mean in national law?
- Which institution has jurisdiction over each actor and type of content?
- For EU contexts, which body is the Digital Services Coordinator, which authorities are designated under Regulation (EU) 2024/900, and which matters fall to the European Commission?
- How are cases involving political advertising, platform duties and personal-data targeting coordinated among authorities?
- Are appointments, budgets and dismissal protections sufficient for institutional independence?
- Can complaints and appeals be decided within the election timetable?
- Which remedies are available and are they proportionate and practically effective?
- How are paid content, political advertising, polls, silence periods and rights of reply treated?
- What ethical or self-regulatory mechanisms supplement the law?
- Where do national rules create gaps, overlaps or risks to editorial independence?

Completion: Key takeaways

- Freedom of expression, media freedom and free elections are mutually reinforcing foundations of electoral communication.
- No single regulatory model is suitable for every country or every category of media.
- The objective is meaningful fairness and informed voter choice, not mechanical uniformity in every programme.
- Restrictions must have a clear legal basis, pursue a legitimate aim and be necessary and proportionate.

- Public service obligations, private editorial freedom and the function of different programme formats must be distinguished.
- Independent institutions, fair procedures, timely review and corrective, proportionate remedies are essential.
- Ethical journalism and self-regulation remain indispensable even where detailed legal rules exist.

Assessment and reflection

- Name the four principal questions that must be answered before restricting election-related expression.
- Give one example where identical treatment could reduce substantive fairness or useful voter information.
- Identify one national rule or institutional practice that should be clarified before the next election.
- What would you change in your professional practice after completing this module?

Recommended resources

- Council of Europe, Recommendation CM/Rec(2022)12 on electoral communication and media coverage of election campaigns.
- Council of Europe, Recommendation CM/Rec(2007)15 on measures concerning media coverage of election campaigns.
- European Convention on Human Rights, Article 10 and Article 3 of Protocol No. 1; relevant ECtHR case-law guides and factsheets.
- Venice Commission, Code of Good Practice in Electoral Matters.
- Regulation (EU) 2022/2065 (Digital Services Act), for applicable EU contexts.
- 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, C/2024/3014.
- Regulation (EU) 2024/900 on the transparency and targeting of political advertising, for applicable EU contexts.
- European Commission, Digital Services Act actions concerning TikTok and the 2024 Romanian presidential election.
- YouTube, “An update on our approach to US election misinformation”, 2 June 2023.
- OSCE/ODIHR, Handbook on Media Monitoring for Election Observation Missions.
- OSCE/ODIHR, Final Report: Croatia Presidential Election, 27 December 2009 and 10 January 2010.
- OSCE/ODIHR, Final Report: Iceland Parliamentary Elections, 27 April 2013.
- OSCE/ODIHR, Final Report: Georgia Parliamentary Elections, 26 October 2024, as an optional contemporary extension.

Trainer follow-up

After delivery, record which distinctions caused difficulty, whether the case reflected the participants’ national context, which legal sources require updating and which issues should be carried forward to Module 3.

Module 2: Legal and ethical framework

Training material to be shared with participants

CONTENTS

CROATIA 2009–2010: EQUAL TREATMENT AND EDITORIAL INDEPENDENCE 20

ICELAND 2013: INCLUSION, USEFULNESS AND EDITORIAL CHOICE..... 21

Croatia 2009–2010: equal treatment and editorial independence

WORKING METHOD **Small**-*group case analysis followed by plenary discussion* | **SUGGESTED TIME** *15–20 minutes*

Scenario

Twelve candidates are contesting a presidential election. The election law requires the media to provide candidates with equal coverage and the same conditions of access. The public service broadcaster provides designated free airtime and organises debates involving all candidates.

A private television channel divides candidates into two groups using public opinion polls. It gives greater news coverage to the first group but offers separate debate programmes to both groups. Five candidates from the first group participate and one declines. Several candidates assigned to the second group complain of unequal treatment and decide not to participate in their debate.

The media regulator warns the broadcaster that it must treat all candidates equally. A journalists' association argues that dividing candidates into groups is necessary to produce informative and engaging programmes for voters.

Task

Advise the competent authority. Decide whether the broadcaster's approach complied with the applicable principles and what, if any, response would be lawful, necessary and proportionate.

Questions for discussion

11. What legitimate objective was the equal-coverage requirement intended to protect?
12. Does equal treatment require identical airtime for every candidate?
13. Should the same standard apply to news, interviews, debates and designated free airtime?
14. Should public service and private media have identical obligations?
15. Were opinion polls an appropriate basis for dividing candidates?
16. Were the criteria clear, objective, transparent and established in advance?
17. What effect could the restrictive interpretation have on voters' access to information?
18. What less restrictive response could address the candidates' concerns?
19. What remedy would protect both meaningful access and editorial independence?
20. Would the answer change if the smaller candidates were excluded entirely?

Iceland 2013: inclusion, usefulness and editorial choice

WORKING METHOD *Comparative group exercise or facilitated plenary* | **SUGGESTED TIME** *10–15 minutes*

Scenario

Fifteen party lists contested the Icelandic parliamentary elections. Public service broadcaster RÚV sought to provide equal opportunities through constituency debates, party-leader debates and interviews. Some stakeholders nevertheless considered the debates overcrowded and insufficiently useful for comparing contestants, while election coverage in regular news remained limited.

Private Channel 2 concentrated on six parties polling above five per cent and organised separate debates for smaller parties. The two broadcasters therefore used different models: broad formal inclusion and poll-based editorial selection supplemented by alternative access.

Task

Compare the two approaches. Identify which model better protects meaningful access, editorial independence and voters' ability to understand the available choices. State what additional information you would need before reaching a conclusion.

Questions for discussion

21. Would a strict requirement of identical treatment improve or weaken coverage in a fifteen-party election?
22. Which criteria may legitimately determine access to debates, interviews, news and designated free airtime?
23. How should meaningful access be assessed when a programme cannot accommodate everyone effectively?
24. Which obligations should differ between public service and private media?
25. What evidence would show whether voters were better informed?
26. What safeguards should accompany poll-based selection?
27. Could alternative interviews or separate debates compensate for exclusion from the principal debate?

COUNCIL OF EUROPE

HUMAN RIGHTS, DEMOCRACY AND THE RULE OF LAW



DROITS DE L'HOMME, DÉMOCRATIE ET ÉTAT DE DROIT

CONSEIL DE L'EUROPE

MODULE 2
LEGAL AND ETHICAL FRAMEWORK

Purpose and learning outcomes

- Identify the main European legal and ethical standards
- Connect expression, pluralism and the right to free elections
- Distinguish law, regulation, co-regulation and self-regulation
- Map institutional and professional responsibilities
- Apply legality, necessity and proportionality
- Recognise ethical issues requiring national adaptation

CORE | 85–90 MINUTES | EXTENDED 110–120 MINUTES

Central regulatory challenge

Protect fairness and meaningful opportunities for contestants

while

preserving editorial independence and useful information for voters

The balance depends on the actor, programme, medium, risk and national framework.

Opening dilemma

A private channel invites only leading candidates to a prime-time debate. The law requires equal treatment but does not define identical airtime.

- NO ACTION
- GUIDANCE
- WARNING
- CORRECTIVE MEASURE
- SANCTION
- MORE FACTS

ACTIVITY | 8–10 MINUTES

Freedom of expression and free elections

ARTICLE 10 ECHR

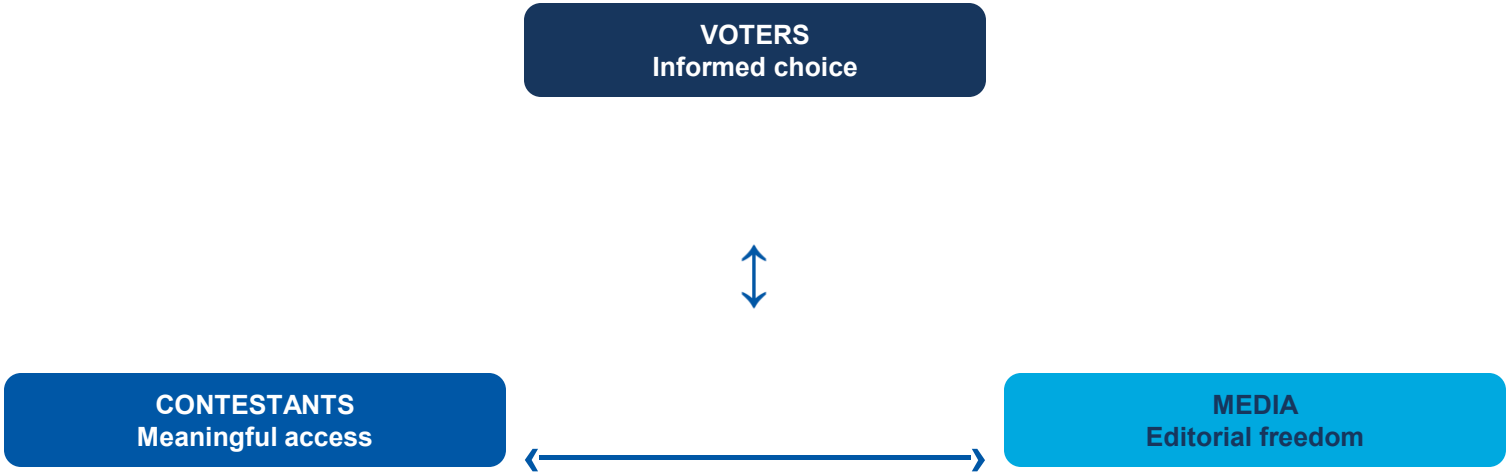
Freedom to hold opinions and to receive and impart information and ideas

PROTOCOL No. 1, ARTICLE 3

Free elections under conditions ensuring the free expression of the opinion of the people

Read the guarantees together. Election periods do not suspend political expression or journalism.

Interrelated rights and responsibilities



No interest automatically decides every case.

Sources of rules

ECHR	Binding State obligations	**ECtHR CASE LAW**	Interpretation of Convention rights
CM RECOMMENDATIONS	Authoritative standards for policy and practice	**VENICE COMMISSION**	Electoral principles and safeguards
EU LAW*	Additional duties in applicable EU contexts	**NATIONAL FRAMEWORK**	Enforceable rules, mandates and remedies

* Digital Services Act and Regulation (EU) 2024/900

Council of Europe standards

CM/REC(2022)12

Current overarching framework across traditional media, online media and platforms

CM/REC(2007)15

Detailed election-campaign principles for media coverage and editorial independence

The 2022 recommendation complements the 2007 text and extends the framework to the contemporary digital environment.

Different media, differentiated duties

PUBLIC SERVICE	Pluralistic, independent and accessible service
PRIVATE BROADCASTERS	Editorial freedom plus national election duties
PRINT AND ONLINE NEWS	Editorial responsibility and professional standards
PLATFORMS	System design, moderation and advertising duties
POLITICAL ACTORS	Sponsorship, spending and conduct rules

Why platforms require a different logic

BROADCAST	PLATFORMS AND VLOPs
Identifiable editorial decision	Personalised recommender systems
Discrete programme or item	Moderation and advertising at scale
Direct and timely correction	Systemic risk and due diligence

A warning or right of reply cannot by itself correct a system that serves different content to every user.

Choosing the appropriate instrument

LEGISLATION	Rights, duties, mandates and serious violations	**INDEPENDENT REGULATION**	Guidance, monitoring, complaints and remedies
CO-REGULATION	Industry participation with public accountability	**SELF-REGULATION**	Professional ethics, correction and complaints
EDITORIAL POLICIES	Formats, verification, labelling and conflicts	**NON-RESTRICTIVE ACTION**	Dialogue, transparency, voter information and literacy

ACTIVITY | INSTRUMENT MATCHING | 10–12 MINUTES

Institutional map

MEDIA REGULATOR	Broadcast and audiovisual rules
ELECTION BODY	Procedures, official information and referrals
COURTS	Timely review and due process
DSC / COMMISSION*	DSA supervision and systemic risks
TTPA / DATA AUTHORITIES*	Advertising transparency and targeting
CIVIL SOCIETY	Monitoring, evidence and public scrutiny

* EU contexts

Independent and effective oversight

- Transparent appointment and removal safeguards
- Adequate expertise and resources
- Clear jurisdiction and fair procedures
- Public, reasoned and timely decisions
- Effective review within the election timetable
- Corrective and proportionate remedies

Proportionality framework

1 LEGAL BASIS

2 LEGITIMATE AIM

3 EVIDENCE AND RISK

4 SUITABILITY

5 NECESSITY

6 BALANCING

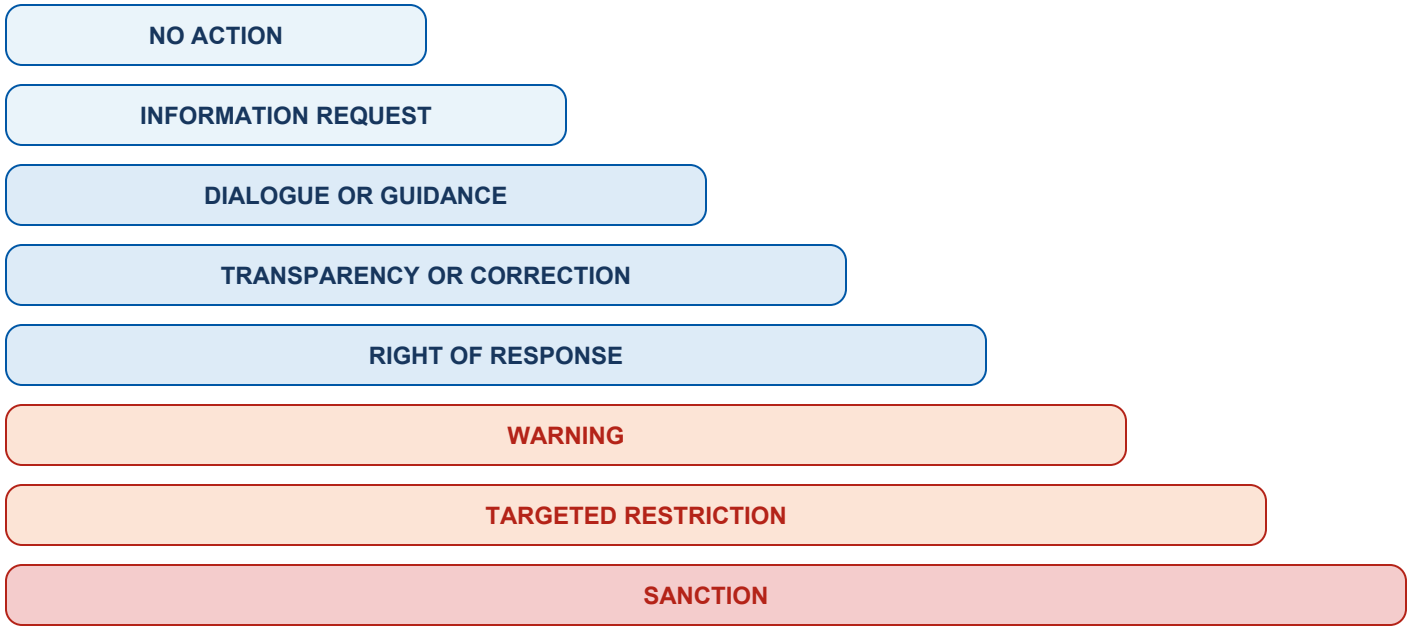
7 DIFFERENTIATION

8 PROCEDURE

9 REMEDY

Differentiation asks whether the medium, programme type, reach or public-service role justifies a different obligation.

Remedy ladder



Ethics beyond minimum compliance

ACCURACY	Verify significant claims	**INDEPENDENCE**	Disclose and manage conflicts
FAIRNESS	Offer meaningful response	**TRANSPARENCY**	Identify sponsorship and format
ACCOUNTABILITY	Correct significant errors	**RESPONSIBLE PRESENTATION**	Avoid manipulation and inflammatory framing
DIGNITY AND PRIVACY	Avoid stereotypes and irrelevant intrusion	**SERVICE TO VOTERS**	Explain choices, records and procedures

Newsroom questions

- Why was this story, candidate or issue selected?
- Are the criteria consistent and explainable?
- Which relevant voice or fact is missing?
- Could the format mislead even if each statement is accurate?
- Does the audience know who produced or paid for the content?

Equality and equity

EQUALITY

The same amount of time or space for every contestant

EQUITY

Access allocated through clear, reasonable and consistently applied criteria

The appropriate model depends on the format, number of contestants and purpose of the rule.

Croatia 2009–2010: the case

- Twelve presidential candidates
- The law required equal coverage and the same access conditions
- A private channel created two groups using opinion polls
- Both groups received separate debate opportunities
- Candidates in the second group complained and declined to participate
- The regulator warned the broadcaster

ACTIVITY | EXERCISE 1 | 15–20 MINUTES

Croatia: group task

Advise the competent authority

- What legitimate objective does equal coverage protect?
- Does equal treatment require identical airtime?
- Should news, debates and designated free airtime follow one standard?
- Were poll-based criteria clear, objective and established in advance?
- What effect could a restrictive interpretation have on voter information?
- Which response would be lawful, necessary and proportionate?

GROUP WORK | EXERCISE 1

Croatia: outcome and debrief

REGULATORY ACTION

Authorities interpreted equality restrictively and warned TV Nova.

BROADCASTER RESPONSE

TV Nova cancelled the second debate.

WIDER EFFECT

A regional station avoided election news because identical coverage appeared impracticable.

A rule intended to expand information risked reducing it.

Croatia: debrief messages

- Interpret equality in light of purpose, programme type and effects on voters
- Stricter allocation rules may suit guaranteed access better than ordinary news
- Private media may retain wider discretion than public service media
- Unequal airtime alone does not determine a proportionate remedy
- Transparent criteria, additional opportunities or a right of response may correct the problem

Iceland 2013: optional comparison

OPTIONAL OR EXTENDED

- Fifteen party lists contested the election
- Public broadcaster RÚV pursued broad formal inclusion
- Some stakeholders found debates overcrowded and less useful
- Private Channel 2 focused on six parties polling above five per cent
- Smaller parties received separate debates

OPTIONAL ACTIVITY | EXERCISE 2 | 10–15 MINUTES

Broadcast and platform remedies

OPTIONAL OR EXTENDED

PROGRAMME-LEVEL ISSUE	SYSTEM-LEVEL ISSUE
Warning	Risk mitigation
Correction	System transparency
Right of response	Advertising labels
Alternative access	Data preservation and research access

Select a remedy that matches the mechanism of harm.

One case, different professional tasks

REGULATORS	Decide the complaint and remedy	**EMBs**	Design referral and coordination
LAWYERS AND JUDGES	Argue or review legality and proportionality	**POLICYMAKERS**	Redraft the ambiguous equality rule
JOURNALISTS	Design a workable debate format	**CIVIL SOCIETY / OBSERVERS**	Draft an evidence-based finding

OPTIONAL OR EXTENDED

National adaptation checklist

OPTIONAL OR EXTENDED

- Which rules govern expression, elections and each media category?
- What do equal, equitable, balanced, impartial or fair mean nationally?
- Which institution has jurisdiction over each actor and content type?
- Can complaints and appeals be decided within the election timetable?
- Which remedies are available and practically effective?
- How do political advertising, data targeting and platform duties connect?
- Which ethical mechanisms supplement the law?

Assessment and reflection

- Name the four principal questions before restricting electoral expression
- Give an example where identical treatment could reduce substantive fairness
- Identify one national rule or institutional practice requiring clarification
- State one change you would make in your professional practice

Key messages

- Expression, media freedom and free elections reinforce one another
- Meaningful fairness matters more than mechanical uniformity
- Different media and programme formats may justify different duties
- Restrictions require clear law, evidence, necessity and proportionality
- Independent institutions and timely corrective remedies are essential
- Ethical journalism remains indispensable beyond legal compliance

END OF MODULE 2

Module 3: Fairness, pluralism and equitable treatment

Training material to be shared with trainers only

CONTENTS

TRAINER OVERVIEW 2

TRAINER PREPARATION AND COMMON MESSAGES 3

OPENING DISCUSSION 4

UNDERSTANDING FAIRNESS AND PLURALISM 4

APPLYING FAIRNESS ACROSS MEDIA AND FORMATS 5

ACCESS CRITERIA AND MEANINGFUL ALTERNATIVES 7

INCUMBENCY AND QUALITATIVE FAIRNESS 8

DESIGNING A FAIR COVERAGE PLAN 9

COVERAGE PLAN DEBRIEF AND ASSESSMENT 11

COMPARING ELECTION EXPERIENCES 12

COMPLETION 12

TRAINING OF TRAINERS GUIDANCE AND ASSESSMENT 14

AUDIENCE ADAPTATION AND STANDARDS 14

ELECTION REPORTS AND SOURCE LOCATORS 15

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

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

Trainer overview

Module objective

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

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

Standards anchor

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

Learning outcomes

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

Session techniques and methods

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

Duration and selection

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

Trainer preparation and common messages

Before the session

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

Route table

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

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

Core messages that should remain constant

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

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

Scope

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

Opening discussion

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

Guidance for trainers

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

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

Trainer emphasis

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

Understanding fairness and pluralism

SESSION METHOD Concept sorting and short explanation | TIME 15 minutes

Guidance for trainers

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

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

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

Key explanation

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

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

Applying fairness across media and formats

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

Guidance for trainers

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

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

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

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

A practical distinction

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

Access criteria and meaningful alternatives

Background for trainers

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

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

Access test

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

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

Recent illustration from North Macedonia

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

Discussion and debrief

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

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

National application

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

Incumbency and qualitative fairness

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

Guidance for trainers

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

Official activity across channels

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

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

Recent illustration from Serbia

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

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

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

Qualitative fairness in practice

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

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

Debrief for Sheet 3

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

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

Designing a fair coverage plan

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

Guidance for trainers

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

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

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

Scenario summary

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

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

Required output

Ask every group to identify its professional role and submit:

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

Peer review

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

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

National adaptation

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

Coverage plan debrief and assessment

What a defensible response should contain

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

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

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

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

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

Assessment rubric

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

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

Common misconceptions to correct

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

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

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

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

Comparing election experiences

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

Guidance for trainers

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

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

Debrief

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

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

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

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

Completion

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

Assessment and reflection

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

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

Trainer answer guide and follow-up

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

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

Training of trainers guidance and assessment

Module-specific facilitation

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

Audience-specific application

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

Assessment and evaluation

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

Evidence of learning and trainer reflection

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

Audience adaptation and standards

Changing the task without duplicating the module

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

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

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

Resources and source locators

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

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

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

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

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

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

Election reports and source locators

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

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

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

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

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

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

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

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

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

Module 3: Fairness, pluralism and equitable treatment

Training material to be shared with participants

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Sheet 1 Opening discussion and concept sorting

Agree or disagree

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

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

Scenario

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

Questions

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

Concept sorting

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

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

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

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

Your initial view

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

Sheet 2 Design a fair coverage plan

Hypothetical scenario

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

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

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

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

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

Task

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

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

Questions for your group

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

Peer review

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

Sheet 3 Compare presentation and official communication

Item A Two interviews and their online extracts

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

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

Task and questions

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

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

Item B A public event during the campaign

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

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

Task and questions

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

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

Group output

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

Sheet 4 Compare recent election experiences

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

Case A North Macedonia local elections in 2025

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

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

Case B North Macedonia presidential and parliamentary elections in 2024

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

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

Case C Albania parliamentary elections in 2025

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

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

Case D Bosnia and Herzegovina local elections in 2024

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

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

Comparison task

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

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

Optional Kosovo comparison

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

Kosovo parliamentary election in 2025

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

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

Optional comparison questions

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

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

Final reflection

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

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COUNCIL OF EUROPE

HUMAN RIGHTS, DEMOCRACY AND THE RULE OF LAW



DROITS DE L'HOMME, DÉMOCRATIE ET ÉTAT DE DROIT

CONSEIL DE L'EUROPE

MODULE 3
FAIRNESS, PLURALISM AND EQUITABLE TREATMENT

Purpose and learning outcomes

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

75, 90 AND 120 MINUTE ROUTES

Fairness in a hybrid media environment

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

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

Opening proposition

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

STRONGLY AGREE | AGREE | UNDECIDED | DISAGREE | STRONGLY DISAGREE

ACTIVITY | SHEET 1 | 10 MINUTES

Four related concepts

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

Internal and external pluralism

INTERNAL PLURALISM

Diversity of political and social voices within one outlet or service

EXTERNAL PLURALISM

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

The two forms complement one another.

Available diversity and exposure diversity

AVAILABLE

Sources that exist and can be accessed

ENCOUNTERED

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

Many available sources can coexist with a narrow individual selection.

Concept sorting

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

Fairness across actors and formats

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

Separate the decisions

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

Do not attribute the entire outcome to one actor.

Allocation tools

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

ACTIVITY | FORMAT MATCHING | 15–20 MINUTES

Access test

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

Meaningful alternatives

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

North Macedonia 2025

ACCESS ARRANGEMENTS

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

ACTUAL COVERAGE

Monitored broadcast election coverage was overall balanced and generally neutral

Balanced reporting can coexist with unfair access arrangements.

Incumbency across channels

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

Serbia 2024: different evidence, different questions

INSTITUTIONAL ACCOUNTS

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

CAMPAIGN INTERACTIONS

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

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

Qualitative fairness

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

Two interviews, different extracts

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

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

PAIRED ACTIVITY | SHEET 3, ITEM A

A public event during the campaign

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

Design a fair coverage plan

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

Required group output

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

Peer review and revision

1 STRENGTH

Could the criteria exclude a relevant new party?

1 VULNERABILITY

Is online access merely nominal?

1 MISSING FACT

Does the remedy assume a power the institution lacks?

Revise one element after the challenge and explain the change.

Assessment rubric

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

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

Common misconceptions

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

Recent election comparison

OPTIONAL OR EXTENDED

NORTH MACEDONIA 2025

Advertising allocation and balanced broadcast coverage

NORTH MACEDONIA 2024

High engagement in an unregulated digital environment

ALBANIA 2025

Institutional-account referrals and a platform restriction

BOSNIA AND HERZEGOVINA 2024

Uneven posting with limited findings in the monitored sample

EXTENDED ACTIVITY | SHEET 4 | 20 MINUTES

Comparison questions

OPTIONAL OR EXTENDED

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

One case, different professional tasks

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

Learning check

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

ASSESSMENT | 5 MINUTES

Key messages

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

END OF MODULE 3

Module 4: Assessing media coverage and identifying imbalances

Training material to be shared with trainers only

CONTENTS

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SOURCES AND FURTHER READING 18

This module enables participants to turn recorded election communication into credible, useful findings. It follows the monitoring process from defining a question and selecting sources to coding content, checking results and reporting what the evidence supports. Its central concern is the quality of the assessment, not simply the amount of data collected.

Use the separate participant workbook for the exercises. Keep this document, including worked calculations and suggested conclusions, with trainers until the activities are complete. The activities can be delivered without PowerPoint slides, specialist software or internet access.

Broadcasting, print, online journalism, political accounts and platform distribution belong in the assessment, but they require different measures and sampling decisions. An airtime share, a number of posts and a view count are not interchangeable measures of influence.

Trainer overview

Module objective

Enable participants to design and apply a transparent monitoring approach, identify possible imbalances across traditional and digital media, and communicate findings with appropriate evidence, context and limits. Participants should be able to distinguish a measured difference from an editorial concern, a potential legal violation and a claim about electoral impact.

Learning outcomes

- Define a monitoring question, relevant standard, population, sample, period and unit of analysis.
- Combine quantitative measures with qualitative assessment of content, presentation, sources and context.
- Apply clear coding rules for actors, official and campaign roles, direct speech and tone, and resolve disagreements through a documented reliability check.
- Calculate coverage shares using explicit denominators and recognise how missing content, genre and actor categories affect interpretation.
- Design a social-media assessment that examines narratives and indicators of possible manipulation or coordinated behaviour, while distinguishing observed signals from proven disinformation, bots or trolls.
- Produce a concise, evidence-backed finding and a feasible recommendation addressed to an actor with the relevant responsibility.

Session techniques and methods

Small-group sampling workshop; individual coding followed by paired comparison; calculation and interpretation clinic; social-media data and behaviour audit; rewriting an overclaimed finding; short election-case comparison; individual exit task. A short quiz or energiser can reactivate the coding rules before the exercise. Offer printed data, calculators and seated discussion as alternatives to online tools and movement.

Duration

Standard route: 120 minutes. Condensed route: 90 minutes. Extended route: 180 minutes. These include instructions, participant work, reporting back and debriefs, but exclude breaks, preparation and translation. The extra time compared with a short introductory module is reserved for practical coding and interpretation. Select a route rather than attempting to deliver all the guidance verbatim.

Standards and scope

Use CM/Rec(2022)12 as the contemporary Council of Europe framework, alongside CM/Rec(2007)15 and applicable national rules. Freedom of expression, editorial independence, pluralism and fair electoral opportunities guide the questions; monitoring supplies evidence for assessing them.

Recommendations are not interchangeable with binding law. Identify the relevant obligation before alleging a violation. [1–3]

Module 3 explains fairness and pluralism; this module tests how to assess them. Detailed manipulation analysis belongs in Module 5, platform and advertising obligations in Module 6, and protection and inclusion in Module 7. Monitoring should still record relevant indicators and refer them for appropriate follow-up.

Preparation and route selection

Trainer checklist

- Review the local media environment, languages, platform use, ownership and access barriers. Consult relevant media outlets and journalists' associations, NGOs and domestic or international observers, as well as competent authorities. Record their claims as stakeholder information until independently verified. Ask which groups and regions an exclusively national or online sample would miss.
- Confirm participants' mandates. Provide current national provisions for any legal assessment; do not assume observers, EMBs and regulators have the same powers.
- Print Sheets 1–6 and keep answers in this guidance. Use Sheet 7 as a reusable field form. All exercise figures and fictional outlets are training data, not findings about a real election.
- Prepare a clock, calculator and board. For experienced groups, substitute a short, cleared local recording with a verified transcript and timestamps; retain the same coding rules and debrief.
- Explain how politically sensitive material will be handled. Avoid exposing personal data, reproducing harassment or asking participants to enter closed groups.
- Allocate groups of three to five and rotate the reporter. Start coding individually so that senior participants do not determine everybody's first answer.

Route table

Session	90 min	120 min	180 min
1 Monitoring question	10	10	10
2 Sample design	15	20	25
3 Coding and reliability	20	25	35
4 Interpretation	15	20	30
5 Social-media evidence audit	15	20	25
6 Reporting and recommendations	10	15	20
7 Recent election comparison	0	5	20
8 Learning check	5	5	15

For 90 minutes, provide the sample inventory and coding rules as advance reading, code only Items 1 and 3 on Sheet 2, and hear one report per exercise. For 120 minutes, code all four items and compare two reports. For 180 minutes, add a second independent coding round, a revised sampling plan and the full comparison exercise. Do not remove the reliability or interpretation debriefs to save time.

Core messages that should remain constant

- Collect evidence that answers a stated question. More observations do not repair a poorly defined sample or unclear coding rule.
- Quantity and quality must be read together. High visibility may consist of criticism; negative coverage may be accurate, relevant journalism.
- News is not expected to be neutral. Monitoring assesses how media outlets select and present political actors; it does not assess whether the monitored actors themselves are worthy, truthful or popular.
- Tone should consider both content and context. What is said and how it is presented may reinforce or pull against each other; where they differ, apply the declared prevailing-factor rule and record the basis.
- Keep outlet-level and format-level results visible. Aggregating opposing editorial patterns can conceal an imbalance within an outlet.
- Airtime monitoring and social-media monitoring answer different questions. Airtime and direct speech help reveal visibility and treatment in editorial coverage. Social-media assessment examines narratives, account and network behaviour, paid or coordinated amplification and possible manipulation, using evidence appropriate to each claim.
- Public metrics remain useful but incomplete. A repeated narrative or unusual activity pattern may justify further inquiry; neither alone proves disinformation, a bot network, a troll operation or platform intent.
- Content analysis describes communication. It does not, by itself, establish how many voters encountered it, whether they believed it, or how they voted.
- Findings should be reproducible, timely and proportionate to the evidence. Preserve uncertainty and give affected actors a fair opportunity to respond.

Asking the right monitoring question

SESSION METHOD Question sorting and short discussion | TIME 10 minutes

Guidance for trainers

Present three questions: “How much news coverage did each contestant receive?”, “Did an outlet treat comparable contestants fairly?” and “Did online campaigning change the result?” Ask what evidence each would require. Spend three minutes on individual answers, four comparing them and three clarifying the boundaries.

The first question needs a defined body of content and consistent measurement. The second also needs standards, qualitative evidence and context. The third needs additional research capable of addressing exposure and causation; content counts alone cannot answer it. Do not allow the monitoring question to expand silently as findings become politically interesting.

As an alternative energiser for experienced groups, use four quick statements: “More airtime always means more favourable treatment”; “Direct speech is additional to total actor coverage”; “Repeated posts prove the accounts are bots”; and “Every false claim is disinformation”. Ask participants to vote before explaining why all four are incorrect under this module’s definitions.

A practical sequence

Define the question and standard; select sources and period; record and code; check consistency and completeness; interpret in context; report and recommend.

At each stage, record decisions so that another analyst can understand how a conclusion was reached. Monitoring can inform a newsroom’s self-assessment, an observation report, voter-

information improvements or a regulatory inquiry. Its evidential requirements and institutional consequences differ with the purpose.

What the wider assessment adds

Interview relevant stakeholders and review ownership, media freedom, journalists' safety, access to information and complaints. Separate independently observed facts from interviewees' allegations. Monitoring output alone cannot reveal every pressure affecting editorial decisions; interviews alone cannot establish the pattern of coverage.

Internal pluralism concerns the range of voices within a service. External pluralism concerns diversity across independent sources. Examine both without claiming that opposing partisan outlets automatically make each outlet's conduct fair. Online, the diversity of available sources is not evidence of what individual users actually see.

Designing a workable sample

SESSION METHOD Sampling workshop using Sheet 1 | TIME 15, 20 or 25 minutes

Guidance for trainers

Give groups five minutes to identify their question, five to choose sources and periods, and five to defend one inclusion and one exclusion. In the standard route, add five minutes to revise the plan after another group challenges it. In the extended route, add a further five minutes on language or regional coverage.

There is no single correct sample. Assess whether the selection answers the question, captures relevant diversity and fits the resources. Ask what the group will stop doing if a new platform or outlet is added. An unmanageable promise to monitor everything is not a stronger design.

Building a transparent sampling plan

Decisions to document

Decision	What the plan should specify
Purpose and population	The communication to be assessed, election type, geographical scope and intended use of findings.
Sources	Selection criteria such as audience relevance, ownership, public or private status, political orientation, language, region and accessibility; identify gaps in audience evidence.
Period and frequency	Dates, time slots, weekdays and weekends, campaign phases and any pre-campaign baseline. State whether the sample is continuous, periodic or event-based.
Formats	News, current affairs, debates, designated access, advertising and voter information kept identifiable; include online formats where relevant.
Online accounts	Inclusion criteria and a dated account list distinguishing editorial outlets, contestants, institutions and other influential actors. Specify whether the task concerns narratives, advertising, engagement, harmful content or behavioural indicators.
Units and measures	Items and actor segments; seconds for broadcast, centimetres squared for print, and words, pixels or screen area for fixed online pages where appropriate; posts, ads and collection timestamps. Explain any overlapping actor references.
Missing material	A capture log, reasons for gaps, attempts to recover content, and how missingness affects the findings.
Capacity and quality control	Recording, coding, supervision, language competence, secure storage and time reserved for checking and reporting.

Sampling choices to explain

A purposive sample selects sources for stated reasons, such as influence and diversity. It does not automatically support a statistical estimate of all media output. A probability sample requires a defined sampling frame and selection procedure. Do not label a convenience list “representative” because it is large.

Prioritise politically significant and influential contestants when resources are limited, but state the criteria and retain a defensible way to capture smaller or emerging contestants. Explain sparse coverage of underdogs rather than treating their absence from the sample or results as self-explanatory.

Use the same collection rules for comparable actors. Keep unexpected incidents in a separate incident log so that complaint-driven discoveries do not silently change the fixed sample. If the design changes, date the revision, explain why and show its effect on comparability.

As a practical rule of thumb, allow at least two weeks of monitoring before describing stable campaign tendencies. Treat this as a minimum field benchmark, not permission to ignore sample intensity, campaign length, missing days or sudden events; shorter periods support only narrower findings.

Print can be measured in centimetres squared and online pages in words, pixels or screen area where a fixed, archived layout permits a consistent comparison. Retain headline size, images and placement as qualitative prominence information. Pixel measurements are not comparable across responsive layouts, devices or personalised feeds. A website snapshot requires a collection time; it is not a record of all versions published that day.

Sheet 1 debrief

The fictional budget supports 24 recorded broadcast hours. Four 30-minute bulletins over 12 days meet that ceiling, but leave no broadcast capacity for radio or debates. A justified alternative might redistribute days or slots to include local radio. Either choice must disclose what is excluded and avoid claiming comprehensive national coverage. The separate online ceiling is six accounts; their role and language mix matter as much as their number.

Ask whether coding time has also been budgeted: 24 hours of recordings usually requires more than 24 hours of staff work once logging, review and reporting are included. No fixed universal processing ratio is assumed.

Coding coverage consistently

SESSION METHOD Individual coding and paired comparison using Sheet 2 | TIME 20, 25 or 35 minutes

Minimum coding rules

Explain the codebook before participants see the answer key. A coding unit must be small enough to apply the rule consistently but large enough to preserve meaning. Record both what was said and how it was presented. [3–6]

Field	Operational rule for this exercise
Source and item	Record outlet or account, date, programme or format, item identifier, location and timecode or URL.
Actor and role	Identify the person or organisation and the capacity shown: official, contestant, party representative or other. Do not automatically assign every ministerial activity to the governing party.
Attributed duration	Seconds in which the actor is speaking or is the identifiable subject of coverage. Count each second once per actor. One interval may concern more than one actor; disclose this if totals are actor-seconds rather than programme duration.
Direct coverage	The actor’s own recorded voice. It is a subset of that actor’s total coverage, not an additional quantity to add to it. Written quotation is coded separately in text-based monitoring.
Indirect coverage	Coverage in which the actor is the identifiable subject but does not speak directly. Under this exercise, direct plus indirect time equals the actor’s attributed duration.

Field	Operational rule for this exercise
Tone of content	Positive: favourable evaluation; negative: adverse evaluation; neutral: factual wording without a clear evaluative direction. Judge the wording about the actor, not the actor's own claim or your opinion of it.
Tone of context	Assess images, camera treatment, sound, captions, editing, juxtaposition, headline and presenter cues. Do not infer a contextual tone from a transcript that does not supply it.
Speaker and target	Identify who makes an evaluation and whom it concerns. A critic speaking about another actor is not automatically portrayed negatively themselves.
Uncertainty	Flag unclear role, reference or tone for review. Split separable positive and negative segments; do not silently call mixed or unresolved material neutral.

Guidance for trainers

Allow five minutes to explain the rules, five for individual coding, five for paired comparison and five for debrief. In the standard route, add five minutes to resolve Items 2 and 4. In the extended route, add ten minutes for independent re-coding and a documented rule revision.

Named tone categories prevent confusion between older training materials that use opposite numeric scales. If software requires numbers, provide an explicit lookup table and check imported data before combining datasets.

Tone matrix

Content and context combination	Final coding rule
Same direction	Code the shared positive, neutral or negative direction and retain the basis.
Different directions	Determine which factor prevails in the overall portrayal, record the final tone and explain the decision. If neither prevails, flag the item for review rather than silently coding it neutral.
Content assessable; context unavailable	Code the content tone and mark the contextual assessment as unavailable.
Content unclear; context assessable	Code only if the codebook permits context to prevail; otherwise refer for review.

Beyond the minimum fields

Depending on the question, add issue, genre, prominence, sources consulted, opportunity to respond, paid or editorial status, language and accessibility. Gender and other inclusion variables

need a clear purpose and appropriate evidence; do not infer sensitive characteristics from a name or appearance. More fields increase training and checking requirements.

Coding exercise and reliability check

Suggested answers for Sheet 2

Item 1: the minister appears in an official capacity for 30 seconds, including 10 seconds of direct and 20 seconds of indirect coverage. The wording is neutral, while the supplied celebratory visuals create a positive context. Participants should apply the prevailing-factor rule, record their basis and refer a genuinely unresolved result for review. Do not recode it as campaign activity solely because an election is approaching.

Item 2: Candidate A is attributed 20 seconds: 10 direct and 10 indirect. The introduction and flattering montage are positive; the direct statement is neutral in content. Code the separable segments and retain the content/context basis. The candidate's voice is not automatically positive merely because it offers publicity.

Item 3: Candidate B receives 20 seconds of indirect coverage and no direct coverage. Both the adverse wording and the supplied red warning graphic are negative in tone. The independent audit may justify the reporting; the tone code does not decide accuracy, bias or illegality. The extract does not establish whether B was asked to respond elsewhere.

Item 4: the first 10 seconds concern a minister's official activity; the next 10 contain an explicit appeal to vote for Party A. Split the roles and record 10 seconds of official direct coverage and 10 of campaign direct coverage, with no indirect time in either segment. Under the exercise's evaluation-based content rule, both segments are neutral; contextual tone is unavailable.

Reliability check

Compare codes before discussion. Record which fields agree, which differ and why. For example, if two coders agree on 8 of 10 tone decisions, raw agreement is 80 per cent. This is a diagnostic, not proof that the codebook is valid: agreement may reflect a dominant neutral category, shared misunderstanding or easy test material.

Revise ambiguous definitions using difficult examples, then test fresh material independently. For a substantial monitoring operation, assess agreement separately for important fields; a chance-corrected measure may be appropriate for categorical codes, alongside disagreement patterns. Check timing consistency separately. Set a review procedure before full coding, and retain original and adjudicated records.

Supervisors should inspect the database periodically during collection, not only at the end. Check permitted values, duplicate records, impossible durations, missing identifiers, direct time exceeding total time and unexpected changes by coder or day. Correct the process as well as the individual record, and document material changes to the codebook.

Common traps to discuss

- Assigning the speaker's criticism to the wrong target.
- Counting a direct statement twice, once as direct and again as additional coverage.
- Treating official and campaign activity as automatically identical, or ignoring an explicit campaign appeal during an official event.
- Using negative tone as a synonym for unfair journalism.
- Inferring sarcasm, visual framing or bias from a transcript when the recording has not been examined.

What a qualitative log adds

Keep the relevant quotation or description, context, timecode, actor, issue and reason for concern. Note camera treatment, headlines, thumbnails, editing, misleading juxtaposition or missing relevant perspectives where observable. Verify an alleged omission against a documented event and the outlet's remit and sample, not simply another outlet's decision to cover it. Distinguish observed presentation from a claim about the editor's intention or the audience's response.

Interpreting quantities and quality

SESSION METHOD Calculation and interpretation clinic using Sheet 3 | TIME 15, 20 or 30 minutes

Guidance for trainers

Allow five minutes for calculations, five for interpreting the apparent imbalance and five for debrief. In the standard route, add five minutes to compare alternative denominators. In the extended route, add ten minutes to design the additional evidence needed before reaching a stronger conclusion.

Begin with the denominator, not the chart. Ask participants to label the outlet, period, format, actor categories, units and missing material before describing a result. Distinguish a share of actor coverage from a share of total news time.

Worked results for Sheet 3

The dataset contains 600 actor-seconds: government in official capacity 180, Party A 120, Party B 180 and Party C 120. Shares of all listed actor coverage are respectively 30, 20, 30 and 20 per cent. These are not shares of the 360 minutes of recorded news.

Excluding official government coverage gives a contestant denominator of 420 seconds. A receives 28.6 per cent, B 42.9 per cent and C 28.6 per cent, rounded to one decimal. The rounded figures total 100.1 per cent; disclose rounding rather than altering a category without explanation.

Direct speech as a proportion of each actor's own coverage is: government 66.7 per cent, A 50 per cent, B 16.7 per cent and C 50 per cent. B has the most contestant coverage, but 120 of its 180 seconds are negative and only 30 seconds are direct speech. The numbers justify closer examination of treatment, not an automatic finding of unfairness.

Indirect coverage is total attributed coverage minus direct coverage: government 60 seconds, A 60, B 150 and C 60. Direct and indirect figures should be cross-tabulated with tone and role rather than treated as independent signs of fairness.

Government coverage plus A totals 300 seconds, or 50 per cent of all listed actor coverage. This can be presented as a clearly labelled supplementary calculation to explore incumbency visibility; it must not replace the distinction between official and campaign activity or imply that every official item was party promotion.

Questions before drawing a conclusion

- Were comparable events treated differently? Was negative coverage supported by evidence, contextualised and accompanied by a reasonable opportunity to respond?
- Did contestants decline invitations, fail to hold events or receive exposure in other relevant formats? Do not assume any explanation without checking it.
- Were timing, placement, interviewer conduct, repeated clips or access conditions materially different?
- Could two missing bulletins change the pattern? Their contents are unknown, not zero.
- What obligations apply to this outlet and genre? Is this an editorial concern, a potential breach requiring inquiry, or insufficient evidence for either?

Trainer emphasis

The 12 recorded bulletins are a defined sample, not the whole campaign. Report each outlet and genre separately before any justified aggregation. Do not add percentages with different denominators or average them without explaining weights. A striking graph must not hide a small dataset, uncertainty or missing content.

Use cross-tabulation: examine time together with direct and indirect coverage, tone, role, outlet, genre and period instead of drawing conclusions from one indicator. The purpose is to see whether indicators reinforce or qualify each other, not to generate every possible table.

Check, double-check and triple-check important figures and quotations. Avoid categorical statements unless the evidence fully supports them. Remove indicators that the team cannot define, collect reliably or use in analysis; unused fields create work and error without strengthening the conclusion.

Monitoring social media and online campaigning

SESSION METHOD Data and behaviour audit using Sheets 4A and 4B | TIME 15, 20 or 25 minutes

Guidance for trainers

In the 90-minute route, use Sheet 4A only: five minutes to identify data problems, five to decide what can be reported and five to debrief. In the 120-minute route, spend eight minutes on Sheet 4A, eight on Sheet 4B and four on a joint debrief. In the extended route, allow ten minutes for each sheet and five minutes to draft an evidence-preservation and escalation plan. Use the same standards of transparency and verification as broadcast monitoring while changing the units, research questions and limits. [4, 7]

Two related but distinct forms of assessment

Traditional media monitoring measures how editorial outlets allocate and present coverage. Airtime, direct speech, tone, genre and prominence help identify patterns of visibility and treatment. These measures remain relevant to online editorial news and video, but they cannot simply be transferred to personalised social-media feeds.

Social-media monitoring can quantify public posts, advertisements and observable interactions, but its principal added value lies in examining narratives and how they travel, possible false or manipulated content, coordinated amplification and signs that accounts misrepresent who controls them or how popular a message is. The analysis may also document harassment or other harmful speech for referral to the relevant module and authority.

Keep four conclusions separate. A narrative is a recurring interpretation or claim, not necessarily false. A false claim is not automatically disinformation because disinformation requires evidence of deliberate deception. Coordination can be genuine collective campaigning or covert manipulation. Automation, fabricated identities and organised trolling require stronger evidence than rapid or repetitive posting alone.

Separate the questions

Object of monitoring	Evidence and limits
Online editorial output	Articles, headlines, clips, sources, actor treatment and editorial placement; retain versions and capture times where feasible.

Object of monitoring	Evidence and limits
Public political accounts	Posts, narratives, formats, actor references and publication patterns; advocacy by a contestant is not assessed as if it were public-service news.
Public institutional accounts	Voter information, official announcements, partisan appeals and possible resource use; distinguish an observed post from a proven legal violation.
Advertising	Available sponsor, creative, dates, spending or delivery information; record gaps, estimates and the source of each field. An ad repository is not automatically a complete record.
Public engagement	Observable reactions, comments and shares under a stated definition; these are actions, not unique people, votes or necessarily support.
Distribution and moderation	Documented recommendations, restrictions, notices or platform data; an observer's feed or high view count cannot establish system-wide algorithmic preference.
Possible coordinated or inauthentic behaviour	Timing, repeated text, shared links, account creation, cross-posting and amplification patterns. Treat these as indicators for further inquiry, not automatic proof of bots, trolls or common control.

Sheet 4A debrief

Six rows contain five unique post identifiers because A1 is duplicated. There are four unique contestant posts, but only three have an observed interaction count. A2 was captured after 24 hours, while A1 and B1 were captured after 72 hours. Their counts should not be presented as a like-for-like party performance comparison.

The absent count for B2 is missing, not zero. Record its unavailability and the collection limits; do not assume it was deleted or infer why it became unavailable. I1 belongs to a public institution and must remain a distinct category. Obtain content and context before deciding whether it is routine information or campaigning.

Collection safeguards

Define interaction components, capture age and collection frequency before monitoring. Preserve the post identifier, account, publication and capture time, content evidence and any known sponsored status. De-duplicate repeated captures without losing the time series. Keep posts, ads and cross-posted material identifiable; do not assume the same content on two services reached different people.

Automated classification, translation and sentiment tools require testing against human-coded material in the relevant language and context. Record their limitations and review contested classifications. Use authorised access, minimise personal data and restrict storage and sharing. Do not promise access to private messaging, complete targeting data or every deleted post.

Social-media narratives and behaviour

Sheet 4B debrief

The fictional pattern supports three limited observations: 12 accounts posted the same claim and link within eight minutes; eight of those accounts were recently created and used generic profile images; and repetitive comments appeared in short bursts under three news articles. These facts justify a hypothesis of possible coordination or artificial amplification. They do not establish who controlled the accounts, whether software posted the material, or whether any participant was a paid troll.

Code the narrative separately from the behaviour. Record the claim about ballot scanners, its variants, source links, language, target and time. Verify the claim against election procedures, technical evidence and other reliable sources. Until falsity and deceptive intent are supported, report it as an unverified claim or narrative rather than declaring "disinformation".

The four established activists who later shared the story in their own words should not automatically join the suspicious cluster. Their posts may show diffusion of the narrative rather than common control. Look for transparent affiliation, independent commentary and temporal sequence. Preserve alternative explanations and note what platform or investigative data would be needed.

Evidence ladder for behavioural claims

Claim	Minimum support before reporting
Recurring narrative	A defined sample of posts with recorded text or media, dates, account roles and a transparent grouping rule.
False or manipulated content	Verification against reliable primary or expert evidence, with the exact false element identified.
Possible coordination	Repeated and temporally linked behaviour across accounts, tested against plausible genuine campaign organisation.
Coordinated inauthentic behaviour	Evidence of both coordination and deception about identity, origin or popularity; use a platform or investigator's finding where available.
Bot or automated account	Reliable technical or platform evidence of automation. High posting frequency alone is insufficient.
Troll or organised trolling	Evidence about organised deceptive participation or control. Hostile language or disagreement alone is insufficient.

Safe documentation and referral

Preserve URLs or identifiers, timestamps, public content, screenshots or archives where lawful, and a record of verification steps. Separate raw evidence from analytical coding. Avoid publishing personal data or naming a private individual as a bot or troll on behavioural indicators alone. Record referrals and decisions by the competent platform, regulator, election authority or law-enforcement body without treating a referral as a confirmed violation.

Reporting findings and recommendations

SESSION METHOD Rewrite and peer review using Sheet 5 | TIME 10, 15 or 20 minutes

Guidance for trainers

Use four minutes to rewrite the statement, three to compare drafts and three for feedback. Add five minutes in the standard route for a recommendation. Add five more in the extended route for a response from the actor addressed. Participants should produce a usable paragraph, not only identify flaws.

Suggested replacement finding

"Across 12 recorded evening bulletins of Public TV during the 14-day monitoring period, Party B received 42.9 per cent of coverage devoted to the three contestants. Two thirds of B's coverage was negative in tone, and direct speech accounted for 16.7 per cent of its coverage. These differences warrant qualitative review, including the subject matter and opportunities to respond. Two scheduled bulletins were not recorded, and the findings do not describe the outlet's entire campaign output."

This is a finding about the fictional dataset. It neither proves an election-law breach nor establishes an effect on voting. The separate social-media exercises cannot substantiate platform favouritism or prove a bot or troll operation.

From evidence to a recommendation

Separate observation, interpretation, applicable standard and proposed action. State who should do what, why it addresses the documented problem and what safeguard or follow-up is needed. Do not recommend an equal-time sanction solely from a tone table.

For this exercise, a defensible immediate step is for the monitoring team to recover the missing bulletins where possible, review B's negative items and request the newsroom's explanation before finalising an assessment of treatment. If a concern remains, the next action depends on the verified facts, applicable rules and the recipient's mandate.

Audience	Appropriate use of the finding
Regulator or supervisory authority	Assess whether there is a basis for an inquiry; identify jurisdiction, evidence, response rights and a proportionate process.
Election management body	Review voter-information implications and matters within its mandate; refer other concerns to the competent body.
Legal professionals and policymakers	Test the evidential basis and legal threshold; distinguish advice, judicial review and possible rule reform.
Journalists and media practitioners	Audit editorial choices, context and response opportunities; verify circulating narratives and explain or correct problems while preserving independence.
Civil society, NGOs and observers	Publish a scoped assessment, disclose methods and limits, preserve evidence of possible manipulation and advocate improvements without claiming enforcement powers.

Reporting checklist

Name the sample and period; show units and denominators; use relevant cross-tabulations; explain missingness and coding; distinguish allegations from verified facts; include relevant responses; use clear tables with source notes; publish while findings can still be useful; correct errors visibly. Check, double-check and triple-check important figures, avoid categorical statements unless fully

supported, and drop indicators that will not be used. Preserve a secure evidence trail sufficient to reproduce the assessment without exposing unnecessary personal data. [3–6]

Comparing recent election experiences

SESSION METHOD Evidence comparison using Sheet 6 | TIME Optional 5 or 20 minutes

Guidance for trainers

For the five-minute route, use the Georgia case: two minutes to read, two to answer and one to summarise. For the extended route, assign different cases to three groups, allow eight minutes for analysis, six for reporting and six for comparison. The figures are attributed observation findings, not training-generated estimates.

Georgia parliamentary elections 2024

ODIHR monitored six television stations and two online outlets from 18 September to 25 October. Formula allocated 56 per cent of its campaign news coverage to Georgian Dream, but 89 per cent of that party's coverage was negative. The report also noted that the regulator did not publish monitoring conclusions before election day. [8]

Ask why visibility alone is an inadequate proxy for favourable treatment and why the timing of publication matters. The tone figures do not independently establish whether individual critical stories were justified. Use this case to link quantity, quality and the usefulness of timely reporting, not to reproduce every legal dispute from the election.

Serbia local elections 2024

ODIHR reported approximately one million interactions with the Facebook and X accounts of eight actors from the ruling SNS, compared with 228,000 for the accounts of the 12 most prominent opposition actors, between 1 May and election day. [9]

Ask participants to identify what would be needed to compare activity fairly: account selection, number of posts, capture timing, definitions, paid promotion and duplication. These totals do not identify unique users, approval, voting behaviour or the causes of the difference. Keep this distinction even if the contrast is politically striking.

Bosnia and Herzegovina local elections 2024

ODIHR's online assessment covered 63 political actors, of whom 46 were active on the monitored services. It did not identify systematic dissemination of hate speech or disinformation in that sample, while noting some inflammatory rhetoric. [10]

Ask what the finding can and cannot say about the wider online campaign, including unmonitored accounts and services. The lesson is to preserve the sample boundary when reporting an absence; it is not a certification that harmful content was absent everywhere.

Debrief

The cases illuminate different limits: amount versus treatment, interactions versus audience response, and sampled observations versus the whole environment. Require participants to state the source, election, period where provided, and limits before using a figure. Do not rank countries on these differently constructed datasets.

Checking learning and next steps

SESSION METHOD Individual exit task | TIME 5 or 15 minutes

Ask each participant to write one monitoring question, one defensible measure, one limitation and one next action relevant to their role. In the extended route, use the remaining ten minutes for paired

challenge and revision. Assess whether the measure answers the question and whether the limitation changes how the conclusion is phrased.

Completion standard: the participant can explain a sample, apply a coding rule, use a denominator correctly, separate an observation from an inference and identify a proportionate professional response. Do not assess success by agreement with the trainer’s political interpretation.

Training of trainers' guidance and assessment

Module-specific facilitation

Treat monitoring as a disciplined answer to a defined question. Do not begin with coding categories before participants agree on purpose, universe, sample and unit of analysis. Common mistakes include changing a sample without disclosure, confusing time allocation with tone, making causal claims from visibility data, and applying broadcast units to social-media research. Demonstrate one coding decision, let participants code independently, then compare and reconcile disagreement before analysing results.

Audience-specific application

Regulators need defensible evidence for supervision and remedy. EMBs need indicators relevant to voter information and institutional communication. Lawyers and policymakers need traceability from rule to indicator. Journalists benefit from understanding what monitoring can and cannot prove. Civil society and observers need feasible samples, quality control and cautious reporting. Use data and outputs appropriate to each role.

Assessment and evaluation

Use a short baseline task asking participants to formulate a monitoring question and choose a sample. Assess the sampling plan, coding reliability check, quantitative interpretation, qualitative finding and social-media narrative analysis. The final finding and recommendation provide the exit assessment.

Evidence of learning and trainer reflection

Participants meet the objective when they can define a workable sample, apply coding rules consistently, cross-tabulate relevant variables, distinguish airtime measurement from online narrative and behaviour analysis, and write a finding with limitations. Require one peer check of another group's evidence chain. Trainers should record categories that produced disagreement and whether retraining or codebook revision is needed.

Audience adaptation

Keep one method and vary the professional task

All audiences need the common evidence rules. Change the product they prepare and the questions they must defend rather than creating five separate lectures. In a mixed group, assign roles and ask each participant what the same evidence permits their institution to do.

Participant profile	Technique and expected product
Media regulators and supervisory authorities	A simulated monitoring-unit briefing: defend the sampling plan, challenge a disputed code and prepare an evidence request before considering action. Include institutional independence and a documented review process.
Election management bodies	A voter-information audit: identify gaps in accessible information and distinguish official communication from campaigning. Produce an internal action or referral note within the EMB's mandate.

Participant profile	Technique and expected product
Lawyers and judges	An evidence challenge: one side defends the dataset, another tests scope, reliability and the legal inference. Produce a reasoned assessment of what the evidence proves and what further inquiry is needed.
Policymakers	A policy clinic: identify whether the problem is a rule, implementation or inadequate evidence. Draft a targeted proposal with safeguards rather than introducing a blanket quota.
Journalists and media practitioners	A newsroom review: code their own fictional bulletin and online clips, verify a circulating narrative, explain editorial choices and design a practical quality check. Avoid converting legitimate criticism into a demand for positive coverage.
Civil society, NGOs and election observers	A monitoring and reporting workshop: publish a short finding with methodology, uncertainty and a feasible recommendation. Document narratives and behavioural indicators without prematurely labelling accounts as bots or trolls. Maintain a transparent correction procedure.

Adapting complexity

For newcomers, provide the codebook and a partly completed record. For experienced analysts, require independent coding, a missing-data assessment and a revised sampling strategy. A small operation should monitor fewer sources reliably rather than use a complicated design it cannot maintain.

For mixed audiences, use the same dataset throughout and give each group a different professional role. Bring them together for the reporting exercise so they can see where editorial responsibility, monitoring, investigation and adjudication diverge.

National adaptation

Replace fictional outlet names only if the exercise remains clearly identified as fictional. If using real local content, verify the source, context, translation and applicable standard, and keep participant material free of the intended conclusion. An Armenia-specific illustration may be added as a short local application without replacing the wider Council of Europe framework.

Follow-up task

Invite participants to use Sheet 7 to pilot five items after the training, compare codes with a colleague and revise one unclear rule. Ask them to retain a short explanation of the change. This is a learning exercise, not a claim that five items establish a campaign-wide pattern.

Sources and further reading

Standards and methodological references

[1] Council of Europe, Recommendation CM/Rec(2022)12 on electoral communication and media coverage of election campaigns, including its appendix. Use for the overall rights-based framework; check national implementation separately. Open source

[2] Council of Europe, Recommendation CM/Rec(2007)15 on measures concerning media coverage of election campaigns and Explanatory Memorandum. User-supplied file: REF COE-CM-

Rec(2007)15.pdf. Read with the 2022 recommendation, not as a complete account of online campaigning.

[3] OSCE/ODIHR, Handbook on Media Monitoring for Election Observation Missions, 2012. User-supplied file: ODIHR mm.pdf. Sections on the media analyst's role, media monitoring methodology and reporting. Open source

[4] OSCE/ODIHR, Guidelines for Observation of Election Campaigns on Social Networks, 2021. Sections on methodology, data collection, analysis and reporting, including the limitations of social-network data. Open source

[5] EODS III Media Analyst Training, 2021 and 2023: materials on the media analyst's role, the media environment, quantitative and qualitative monitoring, monitoring units, data management and statistics, reporting, recommendations, quizzes and exercises. These inform the training sequence and exercises; fictional data and tasks in this package are newly constructed.

[6] Rasťo Kužel and other named trainers in the supplied materials: Monitoring Methodology Ukraine final; MM as a complementary tool; Maastricht presentation; Media effects Ukraine; legal and media-environment exercises; and the Libya training agendas, presentations and reports, 2023–2024. Use as practical methodological background. Historical national rules, software references and numeric tone scales have not been carried over as current universal requirements.

[7] Council of Europe, Monitoring of media coverage of elections. Practical resource referenced in the supplied online-monitoring training. Open source

Recent election reports and locators

[8] OSCE/ODIHR, Georgia parliamentary elections, 26 October 2024, Final Report, 20 December 2024. Section XI, Media: printed page 23, footnote 104, and printed page 24, subsection C, Media Coverage of the Campaign. The PDF page count includes the cover. Open source

[9] OSCE/ODIHR, Serbia local elections, 2 June 2024, Final Report. Section VIII, Election Campaign, printed page 16, online campaign discussion; monitoring period 1 May–2 June. Open source

[10] OSCE/ODIHR, Bosnia and Herzegovina local elections, 6 October 2024, Final Report. Section VIII, Election Campaign, printed pages 15–16, online campaign discussion. Open source

Trainer source check

Before substituting a recent case, read the original report section and its methodological footnotes. Preserve qualifications, distinguish monitoring findings from allegations and decisions, and verify any legal rule against the applicable text. Do not combine percentages from different reports as though their samples and definitions were identical.

The accompanying participant document contains only scenarios, tasks, data and questions. The worked calculations and suggested interpretations remain in this trainer guidance.

Module 4: Assessing media coverage and identifying imbalances

Training material to be shared with participants

CONTENTS

SHEET 1 DESIGN A MONITORING SAMPLE 21

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SHEET 5 WRITE A DEFENSIBLE FINDING 27

SHEET 6 COMPARE RECENT ELECTIONS 27

SHEET 7 REUSABLE MONITORING RECORD 28

Work with your group to collect, interpret and communicate evidence about election coverage. Explain your decisions and record uncertainty. The aim is a defensible assessment, not agreement with a preferred political conclusion.

Sheets 1–5 use fictional scenarios and invented training data. They are not findings about any actual outlet, political actor or election. Sheet 6 contains short, attributed summaries of recent observation reports. Sheet 7 is a blank record for practice.

Your trainer will select activities and time limits. You may write in this workbook or use a separate sheet. A calculator is sufficient; no specialist software or online account is required. Suggested answers and debriefs are held separately by the trainer.

Sheet 1 Design a monitoring sample

GROUP TASK Sampling plan | SESSION TIME 15, 20 or 25 minutes including discussion

Scenario

A parliamentary election is approaching. Your team can capture and analyse up to 24 hours of broadcast output over 12 selected days and monitor six public online accounts. There is no reliable new audience survey. You have two coders and one part-time supervisor, with competence in the majority language and one minority language. The team must also reserve time for checking and reporting.

The task is to assess whether voters receive diverse and useful campaign information. Your brief covers influential national communication but also asks you to consider local and minority-language audiences. You cannot monitor every source.

Available source	Relevant features
Public TV	Nationwide evening news, 30 minutes daily; debates separately; website and public video account.
Commercial TV One	Widely watched according to older research; 30-minute evening news; different ownership from TV Two.
Commercial TV Two	National distribution; 30-minute evening news; prominent political interviews and short online clips.
Regional TV	30-minute evening news serving a competitive region; no reliable audience estimate.
Local minority-language radio	Daily 30-minute news; serves listeners with limited connectivity.
Independent news website	Substantial election reporting; public social account; no audited reach figure.
Contestant accounts	Three principal parties and several smaller contestants post on public social services.
Institutional accounts	The government and EMB publish announcements and voter information.

Task

Prepare a short sampling plan. Specify the question, sources, dates or selection rule, time slots, formats, online account categories, units and missing-data procedure. Use seconds for broadcast and consider centimetres squared for print or words, pixels or screen area for a fixed archived webpage. Explain how it fits the budget and what additional staff time is needed beyond recording.

1. Which sources will you include, and why? Which important communication will remain outside the sample?

2. How will you avoid choosing online accounts merely because they are easy to find or have the most followers?

3. How will you handle a major incident on an unmonitored account without silently changing the sample?

4. What claim will your sample support, and what claim will it not support?

5. How will you prioritise frontrunners while documenting smaller or emerging contestants and explaining sparse coverage of underdogs?

6. Does the period meet the practical two-week minimum for describing campaign tendencies? If not, how must the finding be narrowed?

Group record

Our monitoring question:

.....

Our selection and main limitation:

.....

Sheet 2 Code the coverage

INDIVIDUAL AND PAIRED TASK Coding comparison | SESSION TIME 20, 25 or 35 minutes

Rules for this exercise

Record actor, role, total attributed duration, direct and indirect coverage, and tone. Direct coverage is the actor's own recorded voice; indirect coverage concerns the actor without their direct speech. Direct plus indirect equals total attributed time. Split official activity and explicit campaigning into separate segments.

Assess tone through two factors: content—what is said—and context—how it is presented through images, sound, captions, editing or other cues. If the factors differ, determine the tone according to the prevailing factor and record the basis. If neither prevails, flag the item for review rather than silently calling it neutral. News is not expected to be neutral, and a negative tone code does not itself mean unfair journalism. The object assessed is the media outlet's treatment, not whether the political actor deserves criticism.

Fictional transcript items

Item 1 — 30 seconds. A newsreader spends 20 seconds stating that the health minister opened a clinic and explaining its opening hours. The minister then speaks for 10 seconds: "The clinic opens on Monday and offers appointments from eight until six." The item shows a ribbon-cutting, smiling officials and applause. No party or election is mentioned.

Item 2 — 20 seconds. A presenter spends 10 seconds describing Candidate A as "an exceptionally capable leader with an impressive record", accompanied by a flattering campaign montage. A then speaks for 10 seconds: "Our campaign meeting takes place on Saturday at the town hall."

Item 3 — 20 seconds. A newsreader reports that an independent audit found Candidate B had failed to disclose required expenditure. B is the subject throughout and a red “FAILURE TO DISCLOSE” graphic remains on screen. No statement from B appears in this extract. No additional information about the rest of the programme is supplied.

Item 4 — 20 seconds. The health minister speaks for 10 seconds about the date and services of a clinic opening. The minister then says for 10 seconds: “I am standing for Party A. Vote for Party A on Sunday.” The wording contains no additional evaluative claim.

Your task

Code independently, then compare with a partner before changing any answer. Use separate rows for segments if necessary. Preserve your original decision and explain any revision.

Quantitative record

Item	Actor and role	Total seconds	Direct seconds	Indirect seconds
1				
2				
3				
4				

Tone record

Item or segment	Content tone	Context tone	Final tone and prevailing-factor basis
1			
2			
3			
4			

Questions

1. Where did your codes differ, and which rule would resolve the disagreement?

2. What further information is needed before describing an item as unfair?

3. How would you test a revised codebook on new material?

4. Where did content and context reinforce each other, and where did they differ? Which factor prevailed and why?

Our agreed rule clarification:

.....

Sheet 3 Read the figures

GROUP TASK Calculation and interpretation | SESSION TIME 15, 20 or 30 minutes

Fictional dataset

Public TV was scheduled for monitoring across 14 daily evening bulletins. Twelve 30-minute bulletins were recorded; two recordings are missing. The table contains all coverage attributed to the four listed actor categories in those 12 recordings. Other news is outside this actor table. There are no overlapping actor intervals or unresolved tone codes in this dataset. All values below are seconds.

Party A is the governing party. Official government coverage is kept separate from its campaign coverage. Direct speech is included in total actor coverage. The three tone columns also sum to that total; neither is additional airtime.

Actor	Total	Direct	Positive	Neutral	Negative
Government official role	180	120	0	180	0
Party A	120	60	30	90	0
Party B	180	30	0	60	120
Party C	120	60	0	120	0

Calculations

1. Calculate each actor's share of all listed actor coverage. State the denominator.

2. Calculate each party's share when official government coverage is excluded. State the new denominator and your rounding rule.

3. Calculate direct speech as a proportion of each actor's own coverage.

4. Calculate indirect coverage for each actor and confirm that direct plus indirect equals total coverage.

5. Calculate B's negative coverage as a proportion of B's total coverage.

6. What does combining official government coverage and Party A show? What does it risk obscuring?

Interpretation

Cross-tabulate or read together total time, direct and indirect coverage, tone and actor role. Does the party with the most coverage necessarily receive the most favourable treatment? Identify two possible explanations that require checking before you conclude that an imbalance is unfair.

What can you say about the two missing bulletins? What additional content or records would help assess the pattern? Distinguish a share of actor coverage from a share of total programme time.

Group conclusion

One finding supported by the table:

.....

One conclusion that would go beyond the evidence:

.....

One necessary follow-up check:

.....

Sheet 4-A Audit social-media data

GROUP TASK Check the data before comparing | SESSION TIME 15, 20 or 25 minutes

Fictional dataset

An analyst exports the following rows from a small sample of public accounts on one fictional service. “Interactions” means the recorded sum of reactions, comments and shares. The source provides no information about unique users, paid promotion or audience characteristics. The table contains repeated captures as well as different posts.

Post ID	Account	Age at capture	Interactions	Collection note
A1	Party A	72 hours	1,200	Content captured
A2	Party A	24 hours	400	Content captured
A1	Party A	72 hours	1,200	Same export row repeated
B1	Party B	72 hours	800	Content captured
B2	Party B	Unknown	Missing	Post no longer available at collection
I1	Government institution	72 hours	900	Content not yet reviewed

Task

Prepare a data-quality note before anyone publishes a party comparison. Identify the number of rows, unique posts and unique contestant posts with an observed interaction count. Explain which comparisons are defensible and which need better data.

1. How should repeated rows be handled without losing meaningful repeated measurements?

2. Can a missing interaction value be treated as zero? What should be recorded about the unavailable post?

3. Are the collection ages comparable? What rule would you use for the next collection round?

4. Should I1 be added to Party A’s campaign total? What must be checked first?

5. What would be wrong with describing the counts as “supporters reached” or evidence that the platform favours one party?

6. What additional fields would help distinguish organic content from advertising or other paid promotion?

Group record

Data issues to correct or disclose:

.....

A safe statement about what was observed:

.....

One claim the data cannot establish:

.....

Sheet 4-B Analyse narratives and behaviour

GROUP TASK Separate observations, hypotheses and conclusions | SESSION TIME 8, 10 or 15 minutes

Fictional observations

During one evening, 12 public accounts post the claim “Ballot scanners discard every third opposition vote” and link to the same anonymous page. The posts appear between 20:00 and 20:08 and use identical wording. Eight accounts were created during the previous seven days and use generic profile images.

Within the next 20 minutes, short bursts of comments repeat two identical slogans under three news articles about election technology. Four long-established activist accounts share the claim later that evening, adding their own comments and different images.

The monitoring team has the public posts, account creation dates and collection timestamps. It has no internal platform data about account control, devices, location, automation, payment or recommendation systems. It has not yet verified the claim about the scanners.

Task

Prepare a preliminary analytical note. Separate the narrative from the behaviour used to distribute it. State what the observations support, what remains a hypothesis and which evidence would be required for a stronger conclusion.

1. What is the recurring narrative? Which source, target, format and time fields should be coded?

2. Which facts may indicate coordination or artificial amplification? What genuine behaviour could produce a similar pattern?

3. Can the team call the claim “disinformation” before checking whether it is false and whether someone spread it deliberately to deceive?

4. Can the eight recent accounts be described as bots or trolls? What technical, platform or investigative evidence would be needed?

5. Should the four established activists automatically be grouped with the 12 early accounts? Explain your decision.

6. What public evidence should be preserved, and what personal data should not be published?

Preliminary note

Observed pattern:

.....

Analytical hypothesis:

.....

Unsupported conclusion to avoid:

.....

Verification and referral step:

.....

Sheet 5 Write a defensible finding

GROUP TASK Rewrite and professional response | SESSION TIME 10, 15 or 20 minutes

Fictional draft statement

"Public TV was fair because Party B received the most coverage. The government and Party A took half of all news time, proving an illegal advantage. Online figures show that Party A had more supporters and that the platform favoured it. The regulator should immediately order equal positive coverage for every party."

Task

Using Sheets 3, 4A and 4B, replace this statement with a short, publishable finding of no more than 100 words. Include the source, scope, relevant figures and limitations. Do not turn a concern into a proven violation, or behavioural indicators into proven bots or trolls, without the necessary evidence.

Then propose one next action for the professional role assigned to your group: regulator, EMB, lawyer or judge, policymaker, journalist, or civil society observer. Identify who should act and what evidence they need.

Questions for peer review

1. Are units and denominators explicit and correct?
2. Are direct observation, interpretation and recommendation distinguishable?
3. Does the statement disclose missing material and avoid generalising to the whole election?
4. Does it confuse tone with bias, interactions with people, or visibility with influence?
5. Is the proposed action within the recipient's responsibility and proportionate to what is known?

Your finding

.....

.....

.....

.....

.....

Your next action and responsible actor

.....

.....

One change after peer review

.....

Sheet 6 Compare recent elections

OPTIONAL GROUP TASK Evidence and limits | SESSION TIME 5 or 20 minutes

Case A Georgia parliamentary elections 2024

In its 18 September–25 October monitoring, ODIHR found that Formula devoted 56 per cent of campaign news coverage to Georgian Dream; 89 per cent of that party's coverage was negative. The report also noted that the regulator published no monitoring conclusions before election day.

Source: ODIHR Final Report, 20 December 2024, Section XI, printed pages 23–24, including footnote 104. Open source

Question: What would be lost if a report showed only the share of coverage? What further evidence would you seek, and when should useful monitoring findings be available?

Case B Serbia local elections 2024

ODIHR reported approximately one million interactions with the Facebook and X accounts of eight actors from the ruling SNS, compared with 228,000 for the accounts of the 12 most prominent opposition actors, during 1 May–2 June.

Source: ODIHR Final Report on the 2 June 2024 local elections, Section VIII, printed page 16. Open source

Question: What methodological information would you request before interpreting this contrast? Which claims about voters or platform behaviour would require different evidence?

Case C Bosnia and Herzegovina local elections 2024

ODIHR examined 63 political actors, of whom 46 were active on the monitored services. It reported no systematic dissemination of hate speech or disinformation in the sample, while noting some inflammatory rhetoric.

Source: ODIHR Final Report on the 6 October 2024 local elections, Section VIII, printed pages 15–16. Open source

Question: How should a report describe the absence of a pattern in a sample? What would you need before making a wider claim about the online campaign?

Group task

Select one case and identify: the observation; the scope of evidence; a tempting but unsupported inference; and one useful follow-up question. Use the original report section for fuller context. These summaries are not equivalent national indicators and should not be used to rank the three elections.

Our follow-up question:

.....

Sheet 7 Reusable monitoring record

PRACTICE FORM Use one record per item and additional rows for actor segments

Date and coder: .....

Monitoring question and codebook version: .....

Outlet or account and account role: .....

Programme or format and item ID: .....

Publication date and time: .....

Capture date and time with time zone: .....

Timecode or source URL: .....

Evidence file location or reference: .....

Actor coding

Actor and role	Segment or reference	Total and unit	Direct and indirect	Content tone, context tone and final basis

Qualitative record

Relevant wording, presentation or source context:

.....

.....

Response opportunity or other context requiring verification:

.....

Additional online fields where relevant

Post or ad ID and known sponsor: .....

Observed metric, definition and value: .....

Age at capture and known promotion status: .....

Quality check

Missing information or coding uncertainty: .....

Reviewer and resolution, retaining the original decision: .....

.....

Store evidence securely. Avoid unnecessary personal data and do not reproduce harmful content in a public report merely to demonstrate that it was observed.

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DROITS DE L'HOMME, DÉMOCRATIE ET ÉTAT DE DROIT

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MODULE 4
ASSESSING MEDIA COVERAGE AND IDENTIFYING IMBALANCES

Purpose and learning outcomes

- Define a monitoring question, population, sample, period and unit
- Combine quantitative measurement with qualitative assessment
- Apply coding rules and document reliability checks
- Interpret results using explicit denominators and limitations
- Assess online narratives and behaviour without overclaiming
- Write an evidence based finding and feasible recommendation

90, 120 AND 180 MINUTE ROUTES

Monitoring as an evidence process

QUESTION

What do we need to know?

SAMPLE

Which content can answer it?

CODE

How will we record it?

CHECK

Are records complete and consistent?

INTERPRET

What does the pattern support?

REPORT

What action follows?

The opening questions

VISIBILITY — How much coverage did each contestant receive?

TREATMENT — Did an outlet treat comparable contestants fairly?

IMPACT — Did online campaigning change the result?

Each question needs different evidence.

QUESTION SORTING | 10 MINUTES

What monitoring can and cannot establish

CAN ESTABLISH	CANNOT ESTABLISH ALONE
Observed visibility and treatment	How many voters saw the content
Patterns within the defined sample	Whether voters believed it
Differences requiring explanation	How communication changed votes

Different media, different measures

BROADCAST

Time, direct speech, tone, programme and prominence

PRINT

Space, placement, headline treatment and sources

FIXED WEB PAGE

Archived words, screen area, placement and capture time

SOCIAL MEDIA

Narratives, account behaviour, amplification and public metrics

A transparent sampling plan

QUESTION	A narrow claim the sample can answer	**SOURCES**	Outlets, accounts, languages and regions
PERIOD	Dates, time slots and campaign phases	**UNIT**	Item, segment, post, ad or page capture
LIMITS	What remains outside the sample	**CAPACITY**	Collection, coding, review and reporting time

SAMPLING WORKSHOP | SHEET 1 | 15–25 MINUTES

The fictional sampling budget

BROADCAST CEILING

24 recorded hours

ONLINE CEILING

6 public accounts

Four 30 minute bulletins over 12 days use the full broadcast ceiling. What diversity is lost?

Sampling choices that need explanation

- Influence and diversity criteria for outlets and accounts
- Language, region and accessibility coverage
- Treatment of smaller and emerging contestants
- A fixed procedure for unexpected incidents
- Missing days, recordings and unavailable posts
- Changes to the design and their effect on comparability

Minimum coding rules

ACTOR	Who receives the coverage?	**ROLE**	Official, campaign or other capacity
TOTAL	All attributed time or space	**DIRECT**	The actor's own recorded voice
INDIRECT	Coverage without the actor's direct speech	**TONE**	Content, context and prevailing basis

Tone considers content and context

CONTENT

What the words say

CONTEXT

Images, sound, captions, editing and other cues

If they differ, apply the declared prevailing factor rule and record the basis.

Coding exercise

- Item 1: official clinic opening with celebratory visuals
- Item 2: flattering introduction followed by Candidate A
- Item 3: an audit finding about Candidate B with no reply in the extract
- Item 4: official information followed by an explicit appeal to vote

INDIVIDUAL THEN PAIRED | SHEET 2 | 20–35 MINUTES

The coding traps

TARGET	Assigning criticism to the wrong actor
DOUBLE COUNT	Adding direct speech to total coverage twice
ROLE	Treating every official appearance as campaigning
TONE	Using negative tone as a synonym for unfairness
EVIDENCE	Inferring visual framing from a transcript

Reliability before full collection

COMPARE	Record agreement before discussion
DIAGNOSE	Identify the field and rule behind disagreement
REVISE	Clarify the codebook using difficult examples
RETEST	Use fresh material and independent coding
RETAIN	Keep original and adjudicated records

Agreement can coexist with a shared misunderstanding.

Data quality during collection

- Permitted values and missing identifiers
- Duplicate records and impossible durations
- Direct time exceeding total time
- Unexpected changes by coder or day
- Codebook revisions and their effect on earlier records
- Secure evidence storage and limited personal data

Begin interpretation with the denominator

ALL LISTED ACTORS

600 actor seconds

CONTESTANTS ONLY

420 actor seconds

These are not shares of 360 minutes of recorded news.

Visibility and treatment in the same table

GOVERNMENT	180 total, 120 direct, all neutral
PARTY A	120 total, 60 direct, 30 positive
PARTY B	180 total, 30 direct, 120 negative
PARTY C	120 total, 60 direct, all neutral

The contestant with most coverage does not necessarily receive the most favourable treatment.

Aggregation can conceal imbalance

OUTLET 1	OUTLET 2
Strongly favours Party A	**Strongly favours Party B**

A combined total may look balanced while each audience receives one-sided coverage.

Quantitative and qualitative evidence

QUANTITATIVE	QUALITATIVE
Time or space	Framing and editing
Direct speech	Prominence and sources
Tone counts	Opportunity to respond
Frequency	Relevant omissions

Online monitoring asks different questions

CONTENT	BEHAVIOUR	DISTRIBUTION
Narratives, targets, formats and claims	**Timing, repetition, account history and coordination indicators**	**Organic, paid, recommended or otherwise amplified**

Public signals justify questions. They do not prove intent, automation or platform favouritism.

Public metrics require a data audit

- Count rows, unique posts and valid observations separately
- Preserve repeated captures without double counting posts
- Treat missing values as missing, not zero
- Compare metrics at similar ages after publication
- Check account role before combining totals
- Record whether paid promotion is known or unknown

Narratives and behaviour

Twelve public accounts repeat the same ballot scanner claim within eight minutes.

OBSERVATION	Identical wording, tight timing, shared link and recent accounts
HYPOTHESIS	Possible coordination or artificial amplification
NOT YET PROVEN	Falsity, deceptive intent, bots, trolls or common control
NEXT STEP	Verify the claim, preserve evidence and seek platform or technical data

ANALYTICAL NOTE | SHEET 4B | 8–15 MINUTES

Evidence ladder for online claims

OBSERVED	A public post or metric captured at a stated time
INDICATOR	A pattern that justifies further inquiry
COORDINATION	Evidence connects accounts or actions
INAUTHENTIC OR AUTOMATED	Technical or platform evidence supports the label
ATTRIBUTION	Reliable evidence identifies the responsible actor
IMPACT	Exposure and causal evidence support an electoral effect claim

A defensible finding

SOURCE AND SCOPE	Outlet or account, period, format and sample
OBSERVATION	Figures, qualitative evidence and denominator
INTERPRETATION	Why the pattern matters under the stated standard
LIMITS	Missing material and alternative explanations
NEXT ACTION	A feasible step for the responsible actor

REWRITE TASK | SHEET 5 | 10–20 MINUTES

Overclaiming to remove

"Party B received most coverage, so Public TV was fair."	Visibility alone does not settle treatment.
"Half of all news time went to the government and Party A."	The table measures actor coverage, not total news.
"Interactions show that Party A had more supporters."	Interactions are neither unique people nor political support.
"The regulator must order equal positive coverage."	The evidence does not establish that remedy or mandate.

Recent election evidence

OPTIONAL OR EXTENDED

GEORGIA 2024

Coverage share and strongly negative tone require joint interpretation

SERBIA 2024

Interaction totals require scope, metric and exposure cautions

BOSNIA AND HERZEGOVINA 2024

An absent pattern in a sample supports only a scoped conclusion

Georgia 2024

SHARE OF COVERAGE

56% devoted to Georgian Dream

TONE WITHIN THAT SHARE

89% of that coverage was negative

A coverage share without tone would conceal the character of the reporting.

One dataset, different professional tasks

REGULATORS	Assess compliance and select a proportionate next step
EMBs	**OPTIONAL OR EXTENDED** Improve voter information and refer matters outside the mandate
LAWYERS / JUDGES	Test evidence, procedure and legal characterisation
POLICYMAKERS	Identify a rule, mandate or data access gap
JOURNALISTS	Audit editorial practice and correct verified errors
CIVIL SOCIETY / OBSERVERS	Publish a transparent finding with clear limits

Learning check

- State the monitoring question and denominator
- Name one sampling limitation that changes the conclusion
- Explain why visibility and tone must be read together
- Separate an online observation from a hypothesis
- Identify the responsible actor and a feasible next step

ASSESSMENT | 5–10 MINUTES

Key messages

- Collect evidence that answers a stated question
- Quantity and quality require joint interpretation
- Outlet and format results should remain visible
- Broadcast and social media monitoring answer different questions
- Public metrics are useful but incomplete
- Findings should be reproducible, timely and proportionate to the evidence

END OF MODULE 4

Module 5: Disinformation and Information Manipulation

Training material to be shared with trainers only

CONTENTS

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This module helps participants recognise and assess disinformation and information manipulation during elections without treating contested political speech as an automatic violation. It shifts attention from isolated posts to narratives, actors, behaviour, distribution and potential democratic harm. The module also connects detection with a proportionate response based on mandate, evidence and urgency.

Use the separate participant workbook for activities. Keep the worked answers, case outcomes and debrief guidance in this trainer document until exercises are complete. The activities can be delivered with printed materials and do not require access to social-media accounts or specialist software.

The module addresses domestic information manipulation as well as foreign information manipulation and interference. The term FIMI should be used only when evidence supports a foreign dimension. Where attribution remains uncertain, describe the observed behaviour and use a provisional hypothesis.

Trainer overview

Module objective

Enable participants to distinguish inaccurate information from intentional and coordinated manipulation; analyse narratives and distribution behaviour; assess electoral harm and urgency; and select responses that protect both electoral integrity and freedom of expression.

Learning outcomes

- Distinguish misinformation, disinformation, malinformation, propaganda, hate speech and FIMI, while recognising overlaps and legal differences.
- Analyse a suspected incident through content, narrative, actor, behaviour, distribution, target and harm.
- Identify indicators of coordinated or inauthentic amplification without declaring accounts to be bots, trolls or foreign proxies on insufficient evidence.
- Assess synthetic media and generative-AI content through provenance, context, distribution and harm rather than visual intuition alone.
- Apply a documented verification and escalation process that separates observations, analytical judgments and attribution.
- Choose a timely and proportionate response within the mandate of the responsible actor and explain why non-response may sometimes be preferable.

Session techniques and methods

Concept sorting; narrative and harm mapping; individual evidence coding followed by group comparison; simulated election incident room; response drafting; peer review; short case comparison; individual exit task. Provide printed scenarios, large text and seated roles where needed. Warn participants before material involving harassment or identity-based attacks and allow them to work with a neutral alternative.

Duration

Standard route: 120 minutes. Condensed route: 90 minutes. Extended route: 180 minutes. The timing includes instructions, group work, reports and debriefs but excludes breaks, translation and preparation. The standard route uses the Slovakia case as the main simulation. The extended route adds Romania and Moldova and a second response round.

Standards and scope

CM/Rec(2022)12 is the principal Council of Europe reference for electoral communication in the digital environment. It addresses disinformation campaigns, abusive use of bots and algorithms, platform transparency and safeguards for freedom of expression. Read it together with Article 10 of

the European Convention on Human Rights and Article 3 of Protocol No. 1. Restrictions on expression must have a legal basis, pursue a legitimate aim and be necessary and proportionate. Measures should be transparent, non-discriminatory and use the least restrictive effective means. [1–4]

FIMI is a behaviour-centred analytical concept used by the European External Action Service. It usually concerns intentional and coordinated manipulative behaviour that threatens political processes and may remain lawful in itself. The label is not a substitute for evidence of attribution, illegality or impact. [5–7]

Module 4 supplies the monitoring discipline on which this module builds. Platform governance and political-advertising obligations belong in Module 6, protection and inclusion in Module 7, and wider violations, remedies and resilience in Modules 8 and 9.

Preparation and route selection

Trainer checklist

- Review the national legal framework, electoral calendar, silence period, institutional mandates and emergency communication arrangements. Do not assume that an EMB, regulator, police service, platform or fact-checker can take the same action.
- Map the information environment: major broadcasters and online outlets, platforms, messaging services, languages, regional audiences, influential creators and trusted community intermediaries.
- Consult media, journalists' associations, civil society organisations, fact-checkers, election observers, regulators and EMBs. Treat allegations as leads until independently verified.
- Print Sheets 1–6. Keep the case outcomes and suggested responses in this guidance. The fictional material is for training and makes no allegation about a real actor.
- Prepare an escalation contact list and a simple incident log. For a national adaptation, verify all names, dates and legal powers against primary sources.
- Avoid live searches for harmful content during training. Use archived and redacted examples. Do not expose personal data or ask participants to enter closed groups.
- Agree how participants will distinguish public-interest documentation from amplification. Repeating a false claim in a correction can increase its visibility.
- Assign roles before the simulation and rotate the spokesperson. Let participants analyse individually first so professional hierarchy does not determine the group's initial judgment.

Route table

Session	90 min	120 min	180 min
1 Concepts and safeguards	5	10	15
2 Narratives, actors and harms	10	15	20
3 Behaviour and amplification	15	20	30
4 Generative AI	15	20	30

Session	90 min	120 min	180 min
5 Detection and assessment	15	20	30
6 Proportionate response	15	20	30
7 Recent cases	10	10	15
8 Learning check	5	5	10

For 90 minutes, provide the definitions before the session, use only Items A–C in Sheet 1 and one role in the Slovakia simulation. For 120 minutes, complete all core sheets and compare two professional responses. For 180 minutes, add a second incident, cross-role coordination and a revised response after peer review. Do not remove the safeguards or evidence debrief to save time.

Core messages that should remain constant

- False information and manipulation are related but different problems. Falsity concerns content; manipulation analysis also asks who acted, how, with what coordination, distribution method and apparent purpose.
- Not every inaccurate statement is disinformation. Error, satire, parody, opinion and good-faith reporting require different treatment.
- Harmful content can be authentic and factually accurate. Selective disclosure, decontextualisation, impersonation and coordinated amplification may manipulate the information environment without inventing a fact.
- Repetition, identical wording, new accounts or unusual timing are indicators for inquiry, not proof of bots, foreign control or platform complicity.
- Attribution requires stronger evidence than detection. State what is observed, what is assessed with a confidence level and what remains unknown.
- Electoral harm includes more than persuasion. Manipulation can confuse voters about procedures, suppress participation, intimidate candidates or officials, distort equal opportunities, erode trust and crowd out reliable information.
- Responses should reduce harm without unnecessarily amplifying the claim. Correct the information gap, identify the trusted messenger, preserve evidence and choose the least restrictive effective measure.
- Speed matters, but accuracy and legitimacy matter too. Pre-agreed roles and escalation thresholds allow institutions to respond quickly without improvising powers during a crisis.
- Resilience begins before an incident through transparent election information, independent journalism, media literacy, secure institutions and trusted channels across different communities.

Concepts and safeguards

SESSION METHOD Concept sorting using Sheet 1 | TIME 5, 10 or 15 minutes

Working distinctions

Term	Practical meaning for this module
Misinformation	False or inaccurate information shared without established intent to deceive. Correction may be needed, but intent should not be invented.
Disinformation	Verifiably false, inaccurate or misleading information deliberately created or disseminated to cause harm or obtain political or economic gain by deceiving the public. [1]
Malinformation	Genuine information used or disclosed in a way intended to cause harm, for example through deceptive framing or an invasion of privacy. The term does not itself determine legality.
Propaganda	Communication designed to shape attitudes or action in favour of a political cause or actor. It may contain facts, opinions, omissions or falsehoods and is not automatically unlawful.
Hate speech	Expression covered by the applicable Council of Europe definition and national law; assess its content, context, speaker, intent, reach and likely harm. Do not use “disinformation” as a substitute label. [8]
Information manipulation	Intentional conduct that distorts the information environment through content, deceptive behaviour, distribution or interference. The analysis may include lawful acts and must preserve Article 10 safeguards.
FIMI	A mostly non-illegal, intentional and coordinated pattern of manipulative behaviour involving state or non-state actors or proxies across borders or territories and capable of harming values or political processes. A foreign link must be evidenced, not assumed. [5–7]

Guidance for trainers

Ask participants to classify the Sheet 1 items, then identify what further evidence could change the classification. Accept more than one defensible answer where intent or context is missing. Emphasise that professional action can begin before attribution: an EMB may correct a false polling-place claim while investigators continue to examine its origin.

Freedom-of-expression check

Political speech receives strong protection. A response based on content must distinguish unlawful expression from lawful but harmful or misleading communication. Before recommending removal, blocking, sanctions or compulsory correction, ask: What rule applies? Who has authority? What evidence establishes the threshold? Is the measure necessary? Could labelling, authoritative information, reduced amplification, transparency or a right of reply address the harm with less interference?

Narratives, actors and harms

SESSION METHOD Narrative and harm map | TIME 10, 15 or 20 minutes

From a post to a narrative

A post is one observable item. A claim is a factual proposition that can often be checked. A narrative is a recurring interpretive frame that connects events, actors and emotions, such as “the election is already stolen” or “institutions serve outsiders”. Narratives may combine accurate facts, opinions and false claims. Track them without treating criticism of institutions as manipulation merely because it is uncomfortable.

Analytical map

Dimension	Questions
Message	What is claimed, implied or omitted? What image, audio, label or emotional cue carries the message?
Narrative	Which wider story does the item reinforce? Is the narrative established before the election or attached to a new incident?
Actor and source	Who created, first published, endorsed and amplified it? Which identities are verified, concealed or impersonated?
Target and audience	Which institution, contestant, community or procedure is targeted? Which language, grievance or vulnerability shapes reception?
Behaviour	Is there evidence of coordination, deception, automation, paid distribution, account recycling or cross-platform seeding?
Distribution	Through which outlets, accounts, groups, influencers, advertisements or recommender systems did it travel? What is known about reach?
Harm	Could it mislead voters about how to vote, suppress turnout, intimidate participation, damage safety, distort competition or erode confidence?
Evidence and confidence	Which observations are preserved? Which conclusion is low, medium or high confidence, and what would raise or lower it?

Guidance for trainers

Use Sheet 2. Ask one group to focus on electoral-process harm, another on candidates and participation, and another on affected communities. The same narrative can produce different harms. Gendered or identity-based manipulation may aim not only to discredit one person but to increase the cost of public participation for a wider group.

Sheet 2 adapts a field-tested foreign-influence narrative exercise previously used with civil society and election observers. The crucial distinction is between a domestic claim that institutions, media or civil society are “controlled from abroad” and evidence that a foreign actor actually created, coordinated or financed the campaign. Ask groups what would establish that foreign dimension and what wording remains defensible when attribution is unknown.

Do not infer impact from engagement counts alone. Public reactions can show circulation or attention but not unique exposure, belief or voting behaviour. Ask what additional audience research, surveys or platform data would be needed.

Behaviour and amplification

SESSION METHOD Evidence ladder using Sheet 3 | TIME 15, 20 or 30 minutes

Observable indicators

Possible indicators include near-simultaneous posting, identical or translated wording, repeated links to the same low-credibility domain, clusters of recently created accounts, copied profile material, sudden changes in account topic, systematic replies under unrelated news, coordinated hashtags, undisclosed paid promotion and cross-platform sequencing.

Each indicator has benign explanations. Campaign volunteers may use approved text; activists may mobilise quickly; news events can create real spikes; and new users may join during an election. Analyse combinations, persistence and context rather than treating a single signal as proof.

Evidence ladder

Level	What can be stated
Observation	Describe the captured posts, times, wording, account metadata and public interaction pattern without assigning intent or identity.
Analytical indicator	Explain why the pattern is unusual under a declared rule and identify plausible alternative explanations.
Coordinated behaviour assessment	Support with repeated temporal, linguistic, network or operational connections and record the confidence level.
Inauthentic or automated behaviour	Require evidence that identities or activity misrepresent who controls the accounts or how they operate. High posting volume alone is insufficient.
Attribution	Link the activity to an organisation, campaign, state or proxy only through corroborated technical, financial, documentary, platform or investigative evidence.
Electoral impact	Establish through evidence of reach, audience response, institutional disruption or other effects; do not infer a change in votes from content analysis alone.

Bots, trolls and coordinated inauthentic behaviour

A bot is an automated account or process. A troll usually describes a person or account that provokes or disrupts discussion, but the term is imprecise and should not replace an operational finding. Coordinated inauthentic behaviour concerns deceptive coordination about the identity or origin of actors and their behaviour; the exact platform definition may differ. Report the observable pattern and applicable definition.

Behaviour exercise debrief

Suggested assessment for Sheet 3

The identical wording, narrow eight-minute window, common anonymous link and concentration of new accounts support a hypothesis of coordination. They do not establish automation, payment, common control, foreign attribution or falsity of the underlying claim. The established activist accounts should not be added automatically to the suspected network because later sharing can reflect organic uptake.

The team should preserve URLs, post identifiers, public timestamps, screenshots or lawful archives, account creation dates and the collection method. It should verify the ballot-scanner claim with competent sources, search for earlier or cross-platform versions, examine public network connections and seek platform or investigative assistance where lawful. A preliminary finding should use language such as “a coordinated posting pattern is suspected with medium confidence” and state the basis and limits.

Common analytical errors

- Starting with a preferred label and collecting only evidence that confirms it.
- Treating correlation in timing as proof of common control.
- Calling all anonymous, pseudonymous or recently created accounts fake.
- Equating high interactions with reach, agreement or electoral influence.
- Naming a foreign actor because the narrative aligns with its interests.
- Publishing account lists before completing verification and risk assessment.

Trainer prompt

Ask what evidence would falsify the group’s hypothesis. A credible method looks for disconfirming evidence and updates confidence when new information appears. Record alternative explanations in the incident log rather than mentioning them only after a conclusion is challenged.

Generative AI and synthetic media

SESSION METHOD Synthetic-media triage and scenario | TIME 15, 20 or 30 minutes

What changes and what does not

Generative AI lowers the cost and time needed to produce convincing text, images, audio and video, personalise messages and create many variations. It can facilitate impersonation, fabricated evidence and harassment at scale. It can also support translation, accessibility, journalism and voter information. The analytical task remains to establish authenticity, context, distribution and harm.

Do not rely on visual or auditory intuition, a single detector or the absence of an obvious artefact. Detectors can produce false positives and false negatives. Preserve the original file where lawfully available, record provenance and publication history, compare with verified sources, consult the person or institution depicted, examine contextual inconsistencies and seek specialist analysis when consequences are serious.

Rapid triage

1. Preserve the item, URL, timestamp and account context without redistributing it unnecessarily.

2. Identify the precise claim and the decision voters are being asked to make.

3. Check authoritative sources and contact the impersonated actor where appropriate.

4. Assess circulation, timing, vulnerable audiences and whether a correction would amplify the content.

5. Mark what is verified, likely, uncertain and false. Do not call content AI-generated unless evidence supports that statement.

6. Escalate according to the incident protocol and prepare accurate public information that closes the information gap.

Slovakia 2023 simulation

Shortly before the 30 September parliamentary election and during the campaign moratorium, manipulated audio circulated purporting to capture a discussion about electoral manipulation between a political leader and a journalist. ODIHR reported multiple deepfake audio clips and wider disinformation concerns in the campaign. The timing constrained ordinary political rebuttal and increased the importance of prepared coordination among election authorities, media, civil society and platforms. Use Sheet 4 for the incident-room exercise. [9]

From detection to assessment

SESSION METHOD Incident-room analysis using Sheet 4 | TIME 15, 20 or 30 minutes

Minimum incident record

Field	Record
Incident	Unique identifier, first observation, election phase, analyst and status.
Content and narrative	Exact claim, format, language, wider narrative and known variations.
Source and spread	First known public source, amplifiers, platforms, timing and observed metrics with definitions.
Target and harm	Procedure, institution, person or community targeted; plausible and observed harms.
Verification	Sources consulted, evidence preserved, unresolved questions and contradictions.
Behaviour	Coordination or inauthenticity indicators and alternative explanations.
Attribution	Evidence, confidence and whether the foreign dimension is established, suspected or unknown.
Legal and policy status	Potentially unlawful content or conduct, relevant rule, competent authority and safeguards.
Response	Decision, responsible actor, message, channel, escalation and review time.

Risk and urgency matrix

Assess at least four factors: potential harm, observed circulation, time sensitivity and confidence in the underlying facts. A low-reach false claim about a candidate's policy may require monitoring or journalism. A rapidly spreading false polling-place instruction can justify immediate authoritative correction even if its author remains unknown. A credible threat or doxxing requires a safety response and possible law-enforcement referral.

Do not collapse these factors into a number that hides judgment. Record why an incident falls into the selected response tier and when it will be reassessed.

Verification and analytical writing

Three layers

Observation: “Twelve public accounts posted identical wording and the same link between 20:00 and 20:08.”

Assessment: “The temporal and textual similarity supports a medium-confidence hypothesis of coordination; common campaign messaging remains an alternative explanation.”

Attribution: “No public evidence identifies common control, automation, funding or a foreign actor.”

Keep these layers separate in internal records and public communication. Use confidence language consistently and update it as evidence changes.

Minimum verification questions

- Can the factual claim be checked against a primary source or independent evidence?
- Is the source authentic, and does the material preserve its original context?
- Who first published it, and what is known rather than assumed about that actor?
- Does the circulation pattern differ from normal activity under a documented baseline?
- Is paid promotion, influencer support or cross-platform seeding visible?
- Which affected actor has been offered a fair opportunity to comment?
- What evidence is missing because of privacy, access or platform limitations?

Data protection and safety

Collect only information necessary for the purpose. Use public data lawfully, restrict access, protect investigators and affected people, and avoid publishing personal information that facilitates harassment. Closed or encrypted spaces require particular legal, ethical and methodological care. Election observers should normally rely on public content and credible specialist reporting rather than infiltrating private groups.

Trainer debrief

Good monitoring identifies a decision point. It should tell the responsible actor what is known, how urgent it is, which harm is plausible, what remains uncertain and when to review the assessment. A large archive without an escalation route is detection without response.

Proportionate response

SESSION METHOD Response selection and drafting using Sheet 5 | TIME 15, 20 or 30 minutes

Response options

Option	Appropriate use and safeguards
Monitor and preserve	Use where evidence or circulation is limited. Set a review trigger and avoid indefinite passive monitoring.
Fill the information gap	Publish clear election facts through trusted and accessible channels. Address the correct procedure without repeating sensational falsehoods unnecessarily.
Prebunk	Explain a foreseeable manipulation technique or recurring false narrative before it peaks. Avoid implying that legitimate criticism is illegitimate.

Option	Appropriate use and safeguards
Debunk or correct	Lead with accurate information, identify the evidence and provide an action voters can take. Consider whether repeating the claim will amplify it.
Journalistic response	Verify, contextualise and report the operation or public-interest issue. Avoid embedding harmful material merely for illustration.
Platform escalation	Use an established channel and identify the applicable service rule or legal duty. Preserve evidence and record response times and outcomes.
Regulatory or legal action	Use only within legal powers and with due process, independence, necessity, proportionality and effective review. Distinguish illegal content from lawful but manipulative behaviour.
Safety and security response	Address threats, doxxing, account compromise or cyber incidents through the appropriate protection and law-enforcement pathway.
Strategic and diplomatic action	Where attribution is sufficiently supported, consider public attribution, sanctions or diplomatic measures through competent authorities.

Communication principles

Lead with verified information and the practical action voters should take. Use a messenger trusted by the affected audience and provide accessible formats and relevant languages. State uncertainty honestly. Coordinate facts and roles, not political messaging. Review whether the response reduced confusion, reached the intended audience or unintentionally amplified the manipulation.

Roles and coordination

Actor	Primary contribution
Election management body	Provide rapid, authoritative procedural information; monitor threats to election administration; maintain a correction page and escalation protocol.
Media regulator or supervisory authority	Apply the law independently; monitor relevant services within its mandate; request information or impose remedies only where legally authorised and proportionate.
Courts and judges	Review legality, evidence, procedural fairness and proportionality; provide effective and timely remedy.
Lawyers	Test the legal basis and evidence, protect rights, advise affected actors and frame proportionate remedies.

Actor	Primary contribution
Policymakers	Establish clear mandates, safeguards, transparency duties and resources before elections; avoid last-minute rules tailored to a speaker or viewpoint.
Journalists and media	Verify claims, investigate networks, explain uncertainty, protect sources and avoid becoming an amplification channel.
Civil society and fact-checkers	Detect narratives, verify content, reach communities, document harms and provide independent scrutiny.
Election observers	Assess the environment and institutional response; distinguish observed incidents from proven impact and attribution.
Platforms	Enforce clear rules consistently, preserve evidence, provide transparency and researcher access, address systemic risk and offer redress.
Political actors and influencers	Avoid deceptive practices, disclose sponsorship and synthetic content where required, correct their own false claims and refrain from coordinated harassment.

Coordination protocol

Before the campaign, agree contact points, severity thresholds, evidence fields, secure communication channels and who may speak publicly. During an incident, share verified facts and avoid circulating unnecessary personal data. After action, record what each actor did, whether the response arrived in time and what should change. Institutional cooperation must respect independence: an EMB should not direct editorial decisions, and political authorities should not control fact-checking or enforcement outcomes.

Suggested Sheet 5 debrief

A strong response to the false election-day suspension claim confirms that voting continues, gives the official polling-place lookup method, names the responsible EMB, uses local languages and accessible formats, and asks media and platforms to direct users to the authoritative source. It does not need to accuse a foreign actor before attribution. For the Slovakia audio, a response can state that the recording is manipulated once verification supports that conclusion, explain how voters can check official election information and avoid replaying the audio.

Recent election cases

SESSION METHOD Case comparison using Sheet 6 | TIME 10 or 15 minutes

Romania presidential election 2024

Romania's Constitutional Court annulled the first-round result on 6 December 2024 after finding that essential principles of free democratic elections had been breached. Declassified material indicated a mass online influence operation and undisclosed promotion benefiting a candidate. The European Commission had issued a TikTok data-retention order and later opened formal Digital Services Act proceedings concerning systemic electoral risks. Treat the case as an example of the difficulty of

obtaining a graduated remedy before fast-moving online harm affects an election, not as a template for cancelling results. [10–12]

Moldova presidential election and referendum 2024

ODIHR concluded that both rounds were well managed and contestants could campaign freely overall, while the environment was affected by interference from abroad and active disinformation. The case allows participants to examine how coordinated institutional action can coexist with safeguards, contested attributions and concerns about equal opportunity. [13]

Slovakia parliamentary election 2023

ODIHR reported deepfake audio, manipulative content attributed to foreign sources and domestic politicians, and limited timely remedies for some media complaints. The case highlights moratorium timing, domestic amplification and the need to prepare verification and communication channels before election day. [9]

Guidance for trainers

Do not rank countries or treat one incident as proof of electoral impact. Ask participants to identify the verified fact, the institutional decision, the evidence still required and the safeguard that prevents an overbroad response. Use the full primary report when adapting a case nationally.

Checking learning and next steps

SESSION METHOD Exit task and action commitment | TIME 5 or 10 minutes

Exit task

Give participants this observation: “Ten accounts publish the same false polling-place address within five minutes. Three are new; two are verified party accounts; the others are unknown.” Ask them to write four sentences: one observation, one analytical assessment with confidence, one unsupported conclusion to avoid, and one immediate response.

Expected elements

The observation should preserve facts and source limits. The assessment may identify suspected coordination while recognising campaign messaging or organic copying as alternatives. Participants should avoid claiming bots, common control, foreign interference or changed votes. The immediate response should provide accurate voting information through the EMB and trusted intermediaries, preserve evidence and trigger further review.

Learning check

- Can the participant separate falsity, intent, coordination and foreign attribution?
- Can they identify the narrative and democratic harm without treating criticism as manipulation?
- Can they state what observed indicators do and do not prove?
- Can they select a response within their professional mandate and apply freedom-of-expression safeguards?
- Can they name the missing evidence and a review point?

Follow-up task

Within one month, participants should map their organisation’s contact points and draft one incident protocol covering collection, verification, severity, escalation, public communication, data protection and post-incident review. A tabletop test before the next election should expose gaps while there is still time to fix them.

Training of trainers' guidance and assessment

Module-specific facilitation

Create distance between emotionally powerful content and analytical judgment. Begin with classification and evidence, then move to narratives, behaviour, attribution and response. Common mistakes include using disinformation as a label for any false statement, inferring coordination from similarity, identifying a foreign actor because a narrative aligns with its interests, and treating synthetic content as harmful by definition. Use fictionalised or safely redacted material where displaying real abuse would reproduce harm.

Audience-specific application

Regulators and lawyers should focus on authority, evidence thresholds and safeguards. EMBs should analyse procedural narratives and corrective communication. Journalists should practise verification and reporting without amplification. Civil society and observers should map narratives and behaviour while stating confidence levels. Policymakers should examine structural gaps without drafting content-based powers too broadly.

Assessment and evaluation

Use the concept-sorting task as the entry diagnostic. Assess whether participants separate observation, analytical assessment and attribution; follow the evidence ladder; identify the targeted audience and electoral harm; and select a proportionate response. Use the three-layer writing exercise and final learning check as the exit assessment.

Evidence of learning and trainer reflection

Participants meet the objective when they classify content cautiously, describe amplification without unsupported claims about bots or coordination, state attribution at the level supported by evidence, and propose a response that protects expression. Ask each participant to underline the strongest and weakest clause in their analytical finding. Trainers should note emotional or safeguarding issues that require adaptation.

Audience adaptation

One analytical framework, different professional tasks

Audience	Emphasis	Suitable technique and output
Regulators and supervisory authorities	Mandate, evidence thresholds, platform liaison, due process and proportionate remedy.	Complaint triage and simulated decision with reasons, safeguards and review route.
Election management bodies	Procedural rumours, authoritative information, incident escalation and trusted public communication.	Election incident room and a two-sentence correction in multiple audience formats.

Audience	Emphasis	Suitable technique and output
Judges and legal professionals	Attribution evidence, legality, necessity, proportionality, procedural safeguards and effective remedy.	Structured hearing using an evidence bundle; reasoned decision separating illegal content from lawful manipulation.
Policymakers	Institutional design, independence, resources, transparency and election-period coordination.	Gap analysis and protocol drafting; avoid writing content-based emergency powers around one case.
Journalists and media practitioners	Verification, provenance, network reporting, source protection and avoiding amplification.	Editorial conference deciding whether, when and how to report a synthetic-media incident.
Civil society, fact-checkers and observers	Narrative monitoring, community harm, credible documentation, referrals and limits on impact claims.	Evidence-ladder analysis and public finding with confidence and methodological caveats.

Mixed groups should analyse the same incident from different mandates, then negotiate a coordination plan. Do not ask every group for the same product. A regulator gives a reasoned legal response; an EMB closes an information gap; journalists decide how to report; civil society documents patterns; observers assess the overall environment.

Accessibility and inclusion

Adapt examples to languages and media habits of affected communities. Do not expose participants to repeated abusive content where a neutral description teaches the same skill. Provide content warnings, anonymise targets and allow alternative roles. Ask whose trust is needed and whether the chosen messenger can reach people with disabilities, minority-language audiences and voters with limited connectivity.

Sources and further reading

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

2. European Convention on Human Rights, Article 10, and Protocol No. 1, Article 3. Open source

3. Council of Europe, Recommendation CM/Rec(2018)2 on the roles and responsibilities of internet intermediaries. Open source

4. Council of Europe, Recommendation CM/Rec(2022)13 on the impacts of digital technologies on freedom of expression. Open source

5. EEAS, Information Integrity and Countering Foreign Information Manipulation and Interference. Open source

6. EEAS, 2nd Report on FIMI Threats and Response Framework, 2024. Available through the EEAS FIMI page.

7. EEAS, 3rd Report on FIMI Threats, 2025, and 4th Report, 2026. Available through the EEAS FIMI page.

8. Council of Europe, Recommendation CM/Rec(2022)16 on combating hate speech. Open source

9. OSCE/ODIHR, Slovak Republic Early Parliamentary Elections 30 September 2023, Final Report, 29 February 2024. Open source

10. Constitutional Court of Romania, Decision No. 32 of 6 December 2024, as summarised in Council of Europe Parliamentary Assembly materials on foreign interference.

11. European Commission, TikTok election-risk data-retention order, 5 December 2024. Open source

12. European Commission, formal proceedings against TikTok concerning election risks, 17 December 2024. Open source

13. OSCE/ODIHR, Republic of Moldova Presidential Election and Constitutional Referendum 20 October and 3 November 2024, Final Report, 24 March 2025. Open source

14. Venice Commission, Interpretative Declaration to the Code of Good Practice in Electoral Matters on Digital Technologies and Artificial Intelligence, CDL-AD(2024)044. Open source

15. Council of Europe, Disinformation and electoral campaigns, legal and technical challenges. Open source

16. Council of Europe, Guidance note on the implications of generative artificial intelligence for freedom of expression, 2026.

Verify national law, current platform rules and institutional contact details before delivery. Where a case summary depends on an official decision or election report, use the full primary text rather than this training summary.

Training material to be shared with participants

Work from the evidence supplied. Separate what you observe from what you assess and what you cannot establish. Do not label accounts as bots, trolls or foreign proxies without sufficient evidence. For each proposed response, identify the responsible actor, legal or policy basis, urgency and freedom-of-expression safeguard.

Sheet 1 Classify the information problem

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

Items

A. A local newspaper publishes the wrong deadline for postal voting after misreading an official notice. It corrects the article when the EMB contacts it. No evidence of deliberate deception is available.

B. On election morning, a campaign team knowingly publishes a fabricated notice using the EMB's logo. It falsely claims that voting has been suspended in opposition strongholds and tells those voters to stay home until further notice.

C. A satirical account posts an obviously exaggerated video of every candidate dancing. The account and post are clearly labelled satire.

D. An anonymous channel publishes authentic private medical information about a candidate with a misleading headline two hours before voting begins.

E. Thirty accounts conceal their common operator and coordinate the same false claim about ballot counting. The available evidence does not identify whether the operator is domestic or foreign.

F. A foreign state-linked network and local proxies coordinate deceptive accounts and paid creators to undermine confidence in the electoral register.

Task

For each item, select the most useful working category: misinformation, disinformation, malinformation, satire, information manipulation, possible FIMI or another precisely defined category. More than one category may apply. Explain what is known and what remains uncertain.

Item	Working classification	Evidence and uncertainty	Appropriate first action
A			
B			
C			
D			
E			
F			

Questions

1. Which classification depends on evidence of intent?
2. Which classification requires evidence of a foreign link?
3. Which items may be harmful but remain protected expression?
4. What response can occur before attribution is complete?

Sheet 2 Map a narrative and possible harm

GROUP TASK Narrative and harm mapping | SESSION TIME 10, 15 or 20 minutes

Fictional material

Over three weeks, posts and short videos repeat these messages: “The register is controlled from abroad”; “media and civil society take orders from outsiders”; “real citizens will be erased”; and “the result has already been decided”. Some posts cite genuine administrative delays or accurately identify foreign grants received by independent organisations. Others falsely claim that an overseas software supplier can secretly remove names. The material appears in two minority languages as well as the majority language. No evidence supplied for the exercise establishes who coordinated or financed the posts.

Task

Distinguish individual claims from the wider narrative. Do not assume that every person who criticises the register belongs to a manipulation campaign.

Dimension	Group analysis
Message and verifiable claims	
Wider narrative and emotional cues	
Known creators and amplifiers	
Targeted institution, groups and audiences	
Distribution channels and observed circulation	
Plausible electoral harms	
Evidence needed to assess intent or coordination	

Dimension	Group analysis
Evidence needed to assess exposure or impact	

Questions

1. Which part should the EMB correct, and which part requires journalism or investigation?
2. Could an accurate fact still support a manipulative narrative? Explain.
3. Does a narrative alleging foreign control establish FIMI? What evidence would be required before making that attribution?
4. Which community messenger may be more trusted than a national institution?
5. How would you report the narrative without repeating it so prominently that you amplify it?

Sheet 3 Analyse behaviour and evidence

INDIVIDUAL AND PAIRED TASK Evidence ladder | SESSION TIME 15, 20 or 30 minutes

Fictional observations

During one evening, 12 public accounts post the claim “Ballot scanners discard every third opposition vote” and link to the same anonymous page. The posts appear between 20:00 and 20:08 and use identical wording. Eight accounts were created during the previous seven days and use generic profile images.

Within the next 20 minutes, bursts of comments repeat two identical slogans under three news articles about election technology. Four long-established activist accounts share the claim later, adding their own comments and different images.

The team has public posts, account creation dates and timestamps. It lacks platform data on account control, devices, location, automation, payment or recommendations. It has not yet verified the scanner claim.

Evidence ladder

Level	What the evidence supports
Observation	
Indicator and alternative explanation	
Coordination assessment and confidence	
Inauthentic or automated behaviour	
Attribution	

Level	What the evidence supports
Electoral impact	

Questions

1. Which facts may indicate coordination? Which genuine behaviour could look similar?
2. Can the accounts be called bots or trolls? What evidence would be needed?
3. Should established activists be grouped automatically with the early accounts?
4. Can the content be called disinformation before the scanner claim and intent are checked?
5. What evidence would disconfirm your preferred hypothesis?
6. What public evidence should be preserved, and what personal data should not be published?

Preliminary wording

Observed pattern: .....

Assessment and confidence: .....

Unsupported conclusion to avoid: .....

Next verification step: .....

Sheet 4 Synthetic-media incident room

ROLE SIMULATION Slovakia-inspired scenario | SESSION TIME 15, 20 or 30 minutes

Scenario

At 18:00, two days before an election and after the campaign moratorium begins, an anonymous account posts audio that appears to capture a leading candidate and a journalist discussing how to manipulate the election. The candidate says it is fabricated. The journalist cannot be reached immediately.

At 18:20, six political accounts share the clip. At 18:40, a large news account reports that "audio alleging election fraud is spreading" and embeds it. By 19:00, edited versions with subtitles circulate on three platforms and in a messaging service. One synthetic-media detector returns 72 per cent "likely generated"; another returns "inconclusive". The EMB has no information that election systems are compromised.

Assigned role

Election management body / regulator / judge or lawyer / journalist / civil society and fact-checker / platform team

First 15 minutes

1. What will you preserve?
2. What exact claim must be checked?
3. Who will you contact, and through which pre-agreed channel?
4. What can your role lawfully and practically do now?
5. What will you avoid saying or doing?

Incident assessment

Factor	Assessment and evidence
Potential harm	
Observed circulation	
Time sensitivity	
Confidence in authenticity assessment	
Coordination indicators	
Legal or policy threshold	
Immediate action and review time	

Sheet 4 Continued

Update at 19:15

The journalist confirms that the conversation never occurred and provides an original recording from which several words appear to have been taken. A forensic specialist says the circulated audio shows strong signs of manipulation but needs more time to determine the method. An official election-information page is available in three languages. The platform has acknowledged the urgent escalation but has not acted.

Task

Revise the assessment. Prepare a short internal note and a public response of no more than three sentences. Lead with verified information and practical voter guidance. Decide whether reproducing or linking to the audio is necessary.

Internal note

Observation: .....

Assessment and confidence: .....

Remaining uncertainty: .....

Action, responsible actor and review time: .....

Public response

.....

.....

.....

Coordination check

What do you need from the other professional roles?

.....

What must remain independent rather than coordinated?

.....

Sheet 5 Select and draft a response

GROUP TASK Proportionate response | SESSION TIME 15, 20 or 30 minutes

Incident options

Choose one: the false election-day voting-suspension notice from Sheet 1; the foreign-influence and register narrative from Sheet 2; the suspected coordinated scanner claim from Sheet 3; or the manipulated audio from Sheet 4.

Response menu

Monitor and preserve; fill the information gap; prebunk; correct or debunk; investigate and report; escalate to a platform; regulatory or legal action; safety response; strategic action after supported attribution.

Response plan

Decision	Group answer
Harm to reduce	
Evidence and confidence	
Target audience and trusted messenger	
Selected response and responsible actor	
Legal or policy basis	
Less restrictive alternative considered	
Amplification and safety risk	
Accessibility and language	
Review time and success indicator	

Draft public message

Write no more than three sentences. State what is verified, what voters should do and where authoritative information is available. Do not speculate about attribution.

.....

.....

.....

Peer review

Is the message timely, accurate and understandable? Does it close the information gap without repeating harmful material unnecessarily? Is the action within the actor's mandate and proportionate to the evidence?

Sheet 6 Compare recent election cases

OPTIONAL GROUP TASK Evidence and safeguards | SESSION TIME 10 or 15 minutes

Case A Slovakia parliamentary election 2023

Shortly before the 30 September election and during the campaign moratorium, manipulated audio circulated purporting to capture a discussion about electoral manipulation between a political leader and a journalist. ODIHR reported multiple deepfake audio clips and wider concerns about manipulative content from foreign and domestic actors.

Source: OSCE/ODIHR, Slovak Republic Early Parliamentary Elections, Final Report, 29 February 2024. Open source

Questions: Why did timing matter? What could actors prepare before a moratorium begins? Which conclusions about electoral impact would require more evidence?

Case B Romania presidential election 2024

Romania's Constitutional Court annulled the first-round result on 6 December 2024 after finding breaches of essential principles of free democratic elections. Declassified information indicated a mass online influence operation and undisclosed promotion benefiting a candidate. The European Commission used Digital Services Act powers to preserve platform data and later opened formal proceedings concerning systemic election risks.

Sources: Romanian Constitutional Court Decision No. 32 of 6 December 2024; European Commission actions of 5 and 17 December 2024.

Questions: Which parts concern content, campaign transparency, platform systems and election remedies? Why should annulment not be treated as an ordinary or automatic response to online manipulation?

Sheet 6 Continued

Case C Moldova presidential election and referendum 2024

ODIHR concluded that both rounds were well managed and contestants could campaign freely overall, while the campaign environment was affected by interference from abroad and active disinformation. The case involved institutional measures as well as continuing questions about illicit finance, online enforcement and equal opportunity.

Source: OSCE/ODIHR, Republic of Moldova Presidential Election and Constitutional Referendum, Final Report, 24 March 2025. Open source

Questions: How can institutions respond actively while preserving pluralism and legal safeguards? What should observers assess beyond the number of incidents?

Group comparison

Select one case and complete the record.

Question	Group answer
Verified fact from the source	
Behaviour or narrative at issue	
Responsible institutional actors	
Evidence still needed	
Response used or available	
Freedom-of-expression or due-process safeguard	
Unsupported claim to avoid	

Transfer question

Which lesson can be adapted to your context, and which feature is too country-specific to transfer directly?

.....

Reusable incident record

PRACTICE FORM One record per incident and version every update

Incident ID, analyst and date: .....

Election phase and urgency: .....

First known public observation: .....

Content and narrative

Exact claim and format: .....

Wider narrative and language variants: .....

Targeted procedure, person, institution or community: .....

Source and distribution

First known source and known amplifiers: .....

Platforms or channels and collection times: .....

Observed metrics with definitions: .....

Possible paid, coordinated or inauthentic behaviour: .....

Alternative explanations: .....

Verification and assessment

Evidence preserved and sources consulted: .....

Verified facts: .....

Assessment and confidence: .....

Attribution status and basis: .....

Potential or observed harm: .....

Missing evidence and data limitations: .....

Decision

Applicable rule or policy and competent actor: .....

Response, message and channel: .....

Less restrictive alternative considered: .....

Data protection and safety steps: .....

Escalation contact and time: .....

Review time, outcome and next action: .....

Retain the original record when the assessment changes. Store evidence securely, collect only necessary personal data and distinguish a public-interest finding from an allegation that still requires verification.

COUNCIL OF EUROPE

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DROITS DE L'HOMME, DÉMOCRATIE ET ÉTAT DE DROIT

CONSEIL DE L'EUROPE

MODULE 5
DISINFORMATION AND INFORMATION MANIPULATION

Purpose and learning outcomes

- Distinguish inaccurate information from intentional manipulation
- Analyse narratives, actors, behaviour, distribution and harm
- Use indicators without prematurely labelling bots or foreign proxies
- Assess synthetic media through provenance, context and circulation
- Separate observations, analytical judgments and attribution
- Choose a timely response that protects freedom of expression

90, 120 AND 180 MINUTE ROUTES

The analytical focus

CONTENT	BEHAVIOUR	HARM
What is claimed, implied, altered or omitted?	Who acts, how they coordinate and how content spreads	What electoral process, person or community may be affected

Attribution and impact require stronger evidence than detection.

Core safeguards

- Political speech receives strong protection
- Criticism of institutions does not become manipulation merely because it is uncomfortable
- Restrictions require a legal basis, legitimate aim, necessity and proportionality
- Transparent and non-discriminatory procedures protect against selective enforcement
- The least restrictive effective response should address the identified harm

Working distinctions

MISINFORMATION	False or inaccurate information without established deceptive intent	**DISINFORMATION**	False, inaccurate or misleading information deliberately used to deceive and cause harm or gain
MALINFORMATION	Genuine information disclosed or used with intent to cause harm	**PROPAGANDA**	Communication designed to shape political attitudes or action
HATE SPEECH	Expression assessed under the applicable definition and law	**INFORMATION MANIPULATION**	Intentional conduct that distorts the information environment

CONCEPT SORTING | SHEET 1 | 5–15 MINUTES

Intent changes the classification

ERROR

A newspaper misreads an official deadline and promptly corrects it

DECEPTION

A campaign knowingly fabricates an EMB notice to suppress turnout

Professional action can begin while intent and origin remain under investigation.

FIMI requires a supported foreign dimension

OBSERVED PATTERN

Intentional and coordinated manipulative behaviour may be assessed before origin is known

FIMI ATTRIBUTION

Evidence must support cross-border actors, state links or proxies

Narrative alignment with foreign interests does not establish attribution.

From item to narrative

POST — One observable item

CLAIM — A proposition that can often be checked

NARRATIVE — A recurring frame that connects events, actors and emotions

Narratives may mix facts, opinions and false claims.

Narrative and harm map

MESSAGE	Claim, implication, omission and emotional cue	**ACTOR**	Creator, first publisher, endorser and amplifier
TARGET	Procedure, institution, contestant or community	**BEHAVIOUR**	Coordination, deception, automation or account recycling
DISTRIBUTION	Channels, creators, advertising and recommendation	**HARM**	Confusion, suppression, intimidation or distorted opportunity

GROUP MAP | SHEET 2 | 10–20 MINUTES

Foreign control narrative

"The register is controlled from abroad. Media and civil society take orders from outsiders."

- Some posts cite genuine delays or foreign grants
- Other posts falsely claim that an overseas supplier can erase names
- The material appears in majority and minority languages
- No supplied evidence identifies who coordinated or financed it

Electoral harm extends beyond persuasion

PROCEDURE	Confuse voters about registration, polling or counting
PARTICIPATION	Suppress turnout or deter candidacy
SAFETY	Intimidate candidates, officials, journalists or communities
COMPETITION	Distort equal opportunities and access
TRUST	Erode confidence and crowd out reliable information

Behavioural indicators

- Near-simultaneous posting or repeated wording
- Shared links to low-credibility domains
- Clusters of new accounts or copied profile material
- Sudden changes in account topic or systematic replies
- Coordinated hashtags, paid promotion or cross-platform seeding
- Combinations and persistence matter more than one signal

Evidence ladder

OBSERVATION	Captured posts, times, wording and public metadata
INDICATOR	An unusual pattern with plausible alternatives
COORDINATION	Repeated temporal, linguistic or network connections
INAUTHENTIC OR AUTOMATED	Evidence of deceptive identity or automated operation
ATTRIBUTION	Corroborated links to an organisation, campaign, state or proxy
ELECTORAL IMPACT	Evidence of exposure, response or institutional disruption

EVIDENCE LADDER | SHEET 3 | 15–30 MINUTES

Bots, trolls and inauthentic behaviour

BOT	An automated account or process
TROLL	An imprecise label for provocative or disruptive activity
COORDINATED INAUTHENTIC BEHAVIOUR	Deceptive coordination about actor identity or origin

High posting volume alone supports none of these labels.

Ballot scanner scenario

Twelve accounts post the same claim and link within eight minutes.

- Eight accounts are less than seven days old
- Bursts of identical comments appear under three news stories
- Four established activists share the claim later with their own comments
- No platform data establish control, devices, automation, payment or recommendation

Behaviour exercise debrief

SUPPORTED	A medium-confidence hypothesis of coordination
NOT ESTABLISHED	Automation, payment, common control, foreign origin or falsity
DO NOT MERGE AUTOMATICALLY	Later organic sharing by established activists
NEXT EVIDENCE	Claim verification, archives, public links and lawful specialist support

Generative AI changes scale and speed

RISKS	USES
Impersonation	Translation
Fabricated evidence	Accessibility
Personalised harassment	Journalistic production
Rapid variations	Voter information

The assessment still requires authenticity, context, distribution and harm.

Synthetic media triage

PRESERVE	Original item, URL, timestamp and account context
DEFINE	The precise claim and voter decision at issue
VERIFY	Authoritative sources and the depicted person or institution
ASSESS	Circulation, timing, vulnerable audiences and amplification risk
LABEL CAREFULLY	Verified, likely, uncertain or false
ESCALATE	Use the incident protocol and fill the information gap

Slovakia 2023 incident room

Two days before polling, during the moratorium, manipulated audio appears to capture a candidate and journalist discussing electoral manipulation.

- The candidate says it is fabricated
- Political accounts, news accounts and edited versions amplify it
- Two detectors return different assessments
- The EMB has no evidence that election systems are compromised

The incident update

19:15 UPDATE

- The journalist confirms that the conversation never occurred
- An original recording appears to contain source fragments
- A specialist finds strong signs of manipulation but needs more time
- The platform acknowledges the urgent escalation but has not acted
- Official election information is available in three languages

Minimum incident record

INCIDENT	Identifier, first observation, phase and status	**CONTENT**	Exact claim, format, language and narrative
SPREAD	Source, amplifiers, platforms, timing and metrics	**HARM**	Target, plausible harm and observed harm
EVIDENCE	Preserved material, sources and contradictions	**DECISION**	Responsible actor, response, channel and review time

Risk and urgency

POTENTIAL HARM

What could happen if the claim spreads?

CIRCULATION

What public evidence shows spread or reach?

TIME

How soon could the harm become irreversible?

CONFIDENCE

Which underlying facts have been verified?

Three layers of analytical writing

OBSERVATION

Twelve accounts posted identical wording and the same link within eight minutes.

ASSESSMENT

The similarity supports a medium-confidence coordination hypothesis.

ATTRIBUTION

No public evidence identifies control, automation, funding or a foreign actor.

WRITE EACH LAYER SEPARATELY

Minimum verification questions

- Can a primary source or independent evidence check the claim?
- Is the source authentic and in its original context?
- Who first published it, and what is known about that actor?
- Does the pattern differ from a documented baseline?
- Is paid promotion or cross-platform seeding visible?
- What evidence remains unavailable because of privacy or platform limits?

Response options

MONITOR AND PRESERVE	Limited evidence or circulation with a review trigger
FILL THE INFORMATION GAP	Clear facts through trusted and accessible channels
PREBUNK OR CORRECT	Explain a foreseeable technique or lead with verified information
INVESTIGATE AND REPORT	Verify the operation without unnecessary reproduction
PLATFORM ESCALATION	Use an established channel and applicable rule
LEGAL OR SAFETY RESPONSE	Act within authority, due process and proportionality

RESPONSE PLAN | SHEET 5 | 15–30 MINUTES

Public communication principles

- Lead with verified information and the action voters should take
- Use a messenger trusted by the affected audience
- Provide accessible formats and relevant languages
- State uncertainty honestly
- Coordinate facts and roles rather than political messaging
- Review whether the response reduced confusion or amplified the claim

Recent election cases

OPTIONAL OR EXTENDED

SLOVAKIA 2023	Manipulated audio, moratorium timing and limited response time
ROMANIA 2024	Mass online influence, undisclosed promotion and exceptional judicial remedy
MOLDOVA 2024	Foreign interference, active disinformation and coordinated institutional response

Romania 2024

ELECTION REMEDY

The Constitutional Court annulled the first-round result on 6 December 2024

PLATFORM SUPERVISION

The European Commission preserved data and opened DSA proceedings on systemic election risks

The case illustrates the difficulty of obtaining a graduated remedy before fast-moving harm affects an election.

One incident, different professional tasks

REGULATORS	Triage a complaint and give reasons for a proportionate response	**EMBs**	**OPTIONAL OR EXTENDED** Close a procedural information gap and activate escalation
LAWYERS / JUDGES	Test evidence, legality, safeguards and remedy	**POLICYMAKERS**	Design mandates and protocols before the campaign
JOURNALISTS	Decide whether, when and how to report	**CIVIL SOCIETY / OBSERVERS**	Document narratives and publish a scoped finding

Learning check

Ten accounts publish the same false polling-place address within five minutes.

- Write one observation
- Write one assessment with confidence
- Name one unsupported conclusion to avoid
- State one immediate response and responsible actor

EXIT TASK | 5–10 MINUTES

Key messages

- Not every inaccurate statement is disinformation
- Manipulation analysis examines actors, behaviour, distribution and purpose
- Indicators justify inquiry but do not prove bots or foreign control
- Attribution requires stronger evidence than detection
- Electoral harm includes procedural confusion, intimidation and suppressed participation
- Effective responses reduce harm while protecting lawful expression

END OF MODULE 5

Module 6: Digital platforms and political advertising

Training material to be shared with trainers only

CONTENTS

TRAINER OVERVIEW 2

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THE ADVERTISING CHAIN 8

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LEARNING CHECK AND NEXT STEPS 17

TRAINING OF TRAINERS GUIDANCE AND ASSESSMENT 18

AUDIENCE ADAPTATION AND RESOURCES 18

SOURCES AND FURTHER READING 19

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

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

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

Trainer overview

Module objective

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

Learning outcomes

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

Session techniques and methods

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

Duration

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

Relationship to other modules

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

Preparation and route selection

Trainer checklist

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

Route table

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

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

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

Core messages that should remain constant

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

The platform information environment

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

Five mechanisms of visibility

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

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

Guidance for trainers

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

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

Public-interest balance

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

Political advertising and sponsored influence

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

Working categories

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

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

Guidance for trainers

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

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

The advertising chain

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

Paid, owned and earned visibility

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

Trainer debrief for Sheet 2

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

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

Standards and regulatory layers

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

Council of Europe framework

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

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

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

European Union layer where applicable

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

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

TTPA practical map for EU contexts

Recognition and transparency

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

Targeting and delivery

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

Repositories and records

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

Cross-border services before elections

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

Enforcement caution

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

Targeting, data and recommender systems

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

Targeting questions

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

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

Microtargeting and fairness

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

Recommender systems

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

Monitoring and evidence

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

Monitoring question before tool selection

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

Minimum ad record

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

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

Sampling

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

Evidence limits and quality control

What repositories can and cannot show

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

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

Quality checks

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

Trainer debrief for Sheet 4

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

Institutional assessment and response

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

Response ladder

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

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

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

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

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

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

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

Roles

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

Coordination boundary

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

Recent developments and cases

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

Meta and Google withdraw political ads in the EU

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

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

The Houdini Ads research in Hungary

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

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

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

DSA election risk and Romania 2024

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

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

YouTube changes its election-misinformation policy

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

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

Comparative debrief

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

Transfer caution

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

Learning check and next steps

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

Five-question check

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

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

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

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

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

Suggested answers

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

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

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

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

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

Closing task

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

Trainer follow-up

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

Training of trainers guidance and assessment

Module-specific facilitation

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

Audience-specific application

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

Assessment and evaluation

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

Evidence of learning and trainer reflection

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

Audience adaptation and resources

Adaptation by audience

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

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

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

Sources and further reading

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

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

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

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

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

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

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

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

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

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

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

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

Module 6: Digital platforms and political advertising

Training material to be shared with participants

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REUSABLE POLITICAL ADVERTISING RECORD 29

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

Sheet 1 Classify digital campaign communication

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

Items

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

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

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

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

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

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

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

Task

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

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

Questions

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

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

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

Sheet 2 Audit an advertising chain

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

Fictional ad and notice

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

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

Advertising-chain map

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

Questions

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

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

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

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

Sheet 3 Assess targeting and regulatory layers

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

Scenario

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

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

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

Assessment

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

Sheet 3 Continued

Four-layer legal map

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

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

Decision questions

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

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

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

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

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

Preliminary finding

Observation: .....

Assessment and applicable layer: .....

Evidence still needed: .....

Proportionate next step: .....

Sheet 4 Investigate a repository discrepancy

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

Fictional evidence bundle

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

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

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

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

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

Task

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

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

Sheet 4 Continued

Evidence ladder

Level	Defensible statement
Observation	
Classification assessment	

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

Questions

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

Draft monitoring sentence

.....

.....

Method limitation

.....

Sheet 5 Select an institutional response

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

Assigned role

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

Scenario

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

Response plan

Decision	Role response
Mandate and applicable rule or policy	

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

Questions

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

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

3. Which less restrictive measure should be considered?

4. What notice, reasons and appeal are required?

5. What can be communicated before the investigation concludes?

Public statement in two sentences

.....

.....

Sheet 6 Compare recent developments

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

Development A Platform withdrawal in the EU

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

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

Development B The Houdini Ads research

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

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

Development C Romania and TikTok 2024

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

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

Development D YouTube changes its election-misinformation policy

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

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

Transfer task

Lesson that transfers	Country-specific condition	Action for our institution

Reusable political advertising record

PRACTICE FORM One record for each ad version and observation date

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

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

Reporting rule

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

COUNCIL OF EUROPE

HUMAN RIGHTS, DEMOCRACY AND THE RULE OF LAW

DROITS DE L'HOMME, DÉMOCRATIE ET ÉTAT DE DROIT

CONSEIL DE L'EUROPE

MODULE 6
DIGITAL PLATFORMS AND POLITICAL ADVERTISING

Purpose and learning outcomes

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

90, 120 AND 180 MINUTE ROUTES

The platform information environment

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

One message can travel through several systems

CANDIDATE POST | SUPPORTER SHARES | PAID CREATOR | BOOSTED AD

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

Recommendation may expand visibility without a separate purchase.

Working categories

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

CLASSIFICATION | SHEET 1 | 10–15 MINUTES

Payment, purpose and control

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

These questions overlap, but they are not interchangeable.

The advertising chain

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

Paid, owned and earned visibility

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

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

Four regulatory layers

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

Council of Europe framework

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

EU instruments answer different questions

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

TTPA transparency map for EU contexts

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

Targeting and fairness

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

Paid targeting and organic recommendation

PAID TARGETING

Selects or optimises the audience for paid delivery

RECOMMENDER SYSTEM

Ranks organic and paid content using service design and user signals

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

Monitoring begins with the question

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

No single repository answers all of these questions.

Minimum advertising record

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

Repository evidence has limits

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

Quality control

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

Repository discrepancy scenario

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

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

EVIDENCE EXERCISE | SHEET 4 | 20–35 MINUTES

Evidence ladder for the ad record

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

Institutional response ladder

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

One case, different professional tasks

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

OPTIONAL OR EXTENDED

Platform withdrawal in the EU

OPTIONAL OR EXTENDED

META

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

GOOGLE

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

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

Houdini Ads research

OPTIONAL OR EXTENDED

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

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

Romania and TikTok 2024

OPTIONAL OR EXTENDED

PLATFORM SUPERVISION

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

ELECTION REMEDY

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

The legal bases and thresholds must remain separate.

YouTube 2023 policy change

OPTIONAL OR EXTENDED

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

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

Learning check

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

INDIVIDUAL EXIT TASK | 5–10 MINUTES

Key messages

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

END OF MODULE 6

Module 7: Inclusive and responsible coverage

Training material to be shared with trainers only

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AUDIENCE ADAPTATION 16

RECOMMENDED RESOURCES 17

This module helps participants assess whether election communication enables people in all parts of society to receive useful information, speak in public debate and participate without discrimination or intimidation. It addresses gender equality, minority voices, disability and accessibility, regional and linguistic inclusion, stereotyping, gendered disinformation and technology-facilitated violence.

Use the separate participant workbook for all activities. It contains scenarios and tasks but no outcomes. Keep the debriefs and suggested assessments in this trainer document until participants have completed the exercises. Adapt identity terms to the national context and consult affected groups before delivery.

Trainer overview

Module objective

Enable participants to identify exclusion and harmful portrayal across broadcast, print and digital media; assess quantity, quality, voice, accessibility and safety; distinguish robust political criticism from discriminatory or threatening conduct; and design responses that protect participation, dignity and freedom of expression.

Learning outcomes

- Explain why inclusive coverage concerns voters' access to information as well as candidates' opportunity to communicate.
- Distinguish visibility, direct voice, prominence, subject matter, tone and portrayal.
- Identify stereotypes, sexualised attacks, gendered disinformation, discriminatory narratives and threats without treating every offensive statement as unlawful.
- Examine how gender, disability, age, ethnicity, language, religion, sexual orientation, gender identity, geography and socio-economic position can combine to shape exposure and exclusion.
- Assess accessibility of voter information and campaign coverage across formats and platforms.
- Design a monitoring record that combines disaggregated quantitative data with contextual qualitative analysis.
- Select an ethical editorial, regulatory, institutional or civil-society response within the actor's mandate.

Session techniques and methods

Source audit; portrayal comparison; harm and response map; accessibility test; monitoring-design workshop; newsroom or institutional simulation; reflective learning check. Use fictionalised examples where real material could reproduce abuse. Offer printed, digital, large-print and screen-reader-friendly versions.

Duration

Standard route: 120 minutes. Condensed route: 90 minutes. Extended route: 180 minutes. Timing includes instructions, group work, reporting and debriefs but excludes breaks, interpretation and preparation. The standard route completes Sheets 1–5. The extended route adds detailed coding and the recent-case comparison.

Relationship to other modules

Module 3 supplies the fairness and pluralism concepts, Module 4 the monitoring discipline, and Module 5 the general framework for disinformation and manipulation. Module 6 addresses platform and advertising obligations. This module applies those foundations to participation, representation, safety and accessibility. Modules 8 and 9 develop wider violations, remedies and resilience.

Preparation and route selection

Trainer checklist

- Map groups that may be underrepresented or exposed to discriminatory coverage in the national context. Avoid assuming that one list fits every country.
- Review election, equality, anti-discrimination, media, accessibility, criminal and data-protection rules and identify the competent bodies and available remedies.
- Gather sex-disaggregated candidate data and, where lawful and useful, other aggregate participation data. Do not infer sensitive identity characteristics from appearance or names.
- Sample public service, private and community media, online news, candidate accounts and relevant platforms. Include minority-language and regional outlets where appropriate.
- Review terminology with local equality bodies, organisations of persons with disabilities, women's organisations, minority representatives, journalists, regulators, EMBs and observers.
- Prepare Sheets 1–7 without trainer answers. Remove usernames and unnecessary personal data from abusive content. Warn participants before showing distressing examples and provide a non-exposure alternative.
- Check accessibility of the room and materials, including contrast, font size, captioning, interpretation, reading order and time for participation.
- Establish a referral and safety protocol for credible threats, doxxing, stalking or targeted harassment disclosed during training.

Route table

Session	90 min	120 min	180 min
1 Inclusion standard	10	15	20
2 Visibility and portrayal	15	20	30
3 Gendered disinformation and abuse	20	25	35
4 Social pluralism	10	15	20
5 Accessibility	10	15	20
6 Monitoring	15	20	30
7 Responses and cases	5	5	15
8 Learning check	5	5	10

For 90 minutes, provide the standards map in advance and use one portrayal example, one online-harm scenario and the accessibility test. For 120 minutes, complete Sheets 1–5. For 180 minutes, add Sheet 6 coding, Sheet 7 institutional planning and a national adaptation discussion.

Core messages that should remain constant

- Inclusion is part of electoral integrity because voters need accessible and plural information and contestants need a genuine opportunity to be heard.
- Headcounts alone do not establish inclusion. Measure who appears, who speaks directly, where coverage appears, what topics they address, how they are framed and whether comparable actors receive comparable scrutiny.
- Equal treatment does not always mean identical treatment. Reasonable accommodation, accessible formats and carefully designed measures can remove barriers without controlling editorial conclusions.
- Women candidates should be assessed through their political record and programme under standards comparable to men. Routine attention to appearance, family status or emotional traits can displace substantive scrutiny.
- Gendered disinformation uses false or misleading claims and gendered narratives to deter participation, discredit public actors or polarise communities. Sexist abuse may be harmful even when it is not demonstrably false.
- Online abuse can combine repetition, sexualisation, impersonation, manipulated images, threats and disclosure of personal information. Reach and coordination matter, but a single credible threat can require urgent action.
- Political criticism, satire and unpopular opinion remain protected expression. Assessment must distinguish offence from discrimination, harassment, incitement and credible threats, applying the relevant legal threshold.
- People experience overlapping barriers. Analysis should consider intersectional effects without assigning identities or exposing sensitive personal data.
- Accessible election information benefits a wide public. Accessibility should be designed from the beginning, not added after publication.
- Responses should preserve evidence, protect the target, correct factual harm where possible, address behaviour and systems, and avoid amplifying abusive content unnecessarily.

Inclusion as an electoral communication standard

SESSION METHOD Inclusion and rights map using Sheet 1 | TIME 10, 15 or 20 minutes

Rights and responsibilities

Freedom of expression protects political debate, including speech that shocks or offends. Electoral inclusion also draws on equality and non-discrimination, the right to free elections, political participation and access to information. These principles should be read together rather than used as automatic trump cards.

Council of Europe Recommendation CM/Rec(2022)12 calls for accessible, diverse and inclusive electoral communication and attention to groups that may face exclusion. Recommendation CM/Rec(2013)1 addresses gender equality and media, while CM/Rec(2019)1 provides a framework for preventing and combating sexism. The Convention on the Rights of Persons with Disabilities, particularly Articles 9, 21 and 29, supplies the central accessibility and participation framework for persons with disabilities.

Four dimensions

Dimension	Practical question
Access	Can voters find, receive and understand election information in formats they can use?
Presence	Are different groups visible as candidates, experts, officials, voters and sources?
Agency	Do people speak in their own voices, or are they mainly described by others?
Safety and dignity	Can they participate without discriminatory degradation, intimidation or avoidable exposure to harm?

Guidance for trainers

Ask participants to identify one barrier in each dimension. Keep the distinction between a poor practice, an ethical breach, a platform-policy issue and an unlawful act. The responsible body and remedy may differ.

Visibility, voice and portrayal

SESSION METHOD Comparative source audit using Sheet 2 | TIME 15, 20 or 30 minutes

What to examine

Indicator	Question
Visibility	How much time, space or share of relevant items does each group receive? Compare with candidacy, political relevance and the programme format.
Direct voice	Who receives uninterrupted speech, interviews, quotations or debate participation?
Prominence	Does coverage appear in headlines, opening items and high-audience programmes, or only in marginal slots?
Topics	Are women and minority actors confined to health, family or identity issues while others discuss the economy, security and leadership?
Portrayal	Does the item focus on competence and policy, or on appearance, family, age, morality, disability or conformity with social roles?
Scrutiny	Are comparable actors challenged with comparable seriousness, evidence and relevance?
Sources and experts	Whose expertise counts, and who appears only as a victim, witness or ordinary citizen?

Gender-responsive analysis

Cross-tabulate gender with time or space, tone, direct speech, topic, role and prominence. Compare coverage with the proportion and political standing of candidates. A finding that women received 20 per cent of candidate coverage means little without the candidate composition, programme type and selection rules.

Trainer debrief for Sheet 2

The two fictional profiles contain equally relevant policy proposals. The second version shifts attention to appearance, family and likeability and uses fewer direct quotations. Participants should identify the change in editorial framing without demanding flattering coverage or immunity from legitimate scrutiny.

Gendered disinformation and online abuse

SESSION METHOD Harm and evidence map using Sheet 3 | TIME 20, 25 or 35 minutes

Working distinctions

Pattern	Evidence question
Gender stereotype	Does the message assign competence, morality or social roles according to gender?
Sexist or sexualised abuse	Does it degrade the person through sex, sexuality, body, family status or gender expression?
Gendered disinformation	Which factual or manipulated claim is false or misleading, and how does gender make it persuasive or harmful?
Impersonation or synthetic media	Was an account, voice, image or video fabricated or altered? What can be verified about provenance?
Harassment campaign	Is there repetition, targeting, pile-on behaviour, cross-platform migration or coordinated amplification?
Threat or doxxing	Is there a credible threat, personal data exposure, stalking indicator or immediate safety risk?

Gendered disinformation overlaps with misogyny, homophobia, transphobia and broader influence operations, but the concepts are not interchangeable. Record the content, behaviour, actor, target, audience and harm separately.

Evidence ladder

Begin with the observable post and its context. Add repetition, distribution, linked accounts and technical indicators only when evidence supports them. Do not infer coordination from similar opinions alone or attribute a campaign to a state or organisation merely because its narrative serves that actor's interests.

Safety-centred analysis and response

Harm assessment

Ask whether the content seeks to discredit competence, sexualise the target, question moral legitimacy, isolate a community, suppress participation, provoke harassment or create physical danger. Consider scale and speed, but also specificity. A low-reach post containing an address and credible threat may require a faster response than a high-reach insult.

Do not reproduce the harm

- Capture the minimum necessary evidence and restrict access to personal data.
- Avoid repeating slurs, intimate images or false allegations in headlines and social posts.
- Do not require the target to prove emotional suffering before institutions act on a credible safety concern.
- Seek informed consent before identifying a victim or survivor and explain foreseeable publication risks.
- Offer participants a text summary instead of graphic content.

Trainer debrief for Sheet 3

The fictional scenario contains a manipulated sexualised image, repeated posts and publication of a campaign worker's telephone number. Groups should separate verification, platform reporting, newsroom correction, security assessment and possible legal referral. Removal may be urgent, but preservation of evidence should occur first where safely possible. Public rebuttal should avoid republishing the image or exposing the telephone number.

Slovakia and Czechia research example

The 2025 study by MEMO 98 and Women in Media examined gendered disinformation in Slovakia and Czechia across key political events from 2022 to 2025, including the 2024 European Parliament elections. Its analysis covered more than 8,600 public social-media posts that together recorded more than 16 million views. The posts either contained defined gendered-disinformation keywords or featured or quoted actors identified by the research. These figures describe the study dataset and platform-reported views. They do not represent the number of unique people exposed or the prevalence of gendered disinformation across the whole information environment.

The study also incorporated interviews with 21 experts and reported results from a Women in Media survey of Czech journalists. Within that survey, 71 per cent of women and 38 per cent of men reported a decrease in self-esteem following attacks. Reported forms of online abuse included disinformation attacks at 25 per cent, defamation at 19 per cent, and harassment or stalking at 10 per cent. Trainers must present these as findings from the cited survey sample, not as population estimates for all journalists in Czechia or the wider region.

One documented narrative misrepresented the Istanbul Convention as promoting so-called "gender ideology" and falsely linked it to same-sex marriage or mandatory sex education. Use this example to show how a treaty on preventing and combating violence against women can be reframed as a threat to identity, sovereignty or family life. Examine the factual claim, narrative frame, political context and distribution separately. Avoid naming individual targets or reproducing abusive content. The wider research describes attacks on women in politics and journalism and on LGBTQ+ people and illustrates how gender or sexuality may overlap with ethnicity, religion or another minority status.

Social pluralism and intersectional exclusion

SESSION METHOD Voice and source map using Sheet 4 | TIME 10, 15 or 20 minutes

Social pluralism

Social pluralism concerns the range of social experiences, communities, regions, languages, beliefs and interests represented in public communication. It can be examined through programme diversity, geographical coverage, sources, topics, language and access by different groups.

Count who appears, then ask what role each person occupies and what topics they may address. A programme may include women or minority speakers mainly as victims while relying on majority men as experts and decision-makers. Numerical presence can coexist with limited agency.

Intersectional analysis

Intersectionality examines how overlapping characteristics and structures produce distinct barriers. A Roma woman candidate, a young politician with a disability or an LGBTQ+ journalist in a rural area may experience patterns that cannot be understood by examining one characteristic alone.

Use aggregate categories only when they answer a defined question and can be recorded lawfully and reliably. Self-identification is preferable. Do not guess ethnicity, disability, religion, sexual orientation or gender identity from names, images or speech.

Trainer debrief for Sheet 4

Participants should identify missing voices and the roles assigned to those present. A responsible response might diversify sources, commission reporting from undercovered regions, provide interpretation or accessibility, and review booking practices. It should not impose a predetermined viewpoint or use token representatives as substitutes for substantive reporting.

Accessibility and voter information

SESSION METHOD Accessibility test using Sheet 5 | TIME 10, 15 or 20 minutes

Accessibility chain

Stage	Checks
Find	Clear titles, predictable location, searchable text, timely publication and workable links.
Perceive	Captions, transcripts, sign-language provision where appropriate, alt text, contrast, readable type and audio description for essential visual information.
Understand	Plain language, translated or minority-language information where needed, explained deadlines and examples.
Act	Accessible forms, keyboard navigation, sufficient time, contact alternatives and help routes.
Verify	Date, issuing authority, version, correction notice and consistent information across channels.

Editorial and institutional responsibility

EMBs have a direct responsibility to make official voter information accessible. Media should consider accessibility in debates, interviews, election explainers and digital publishing. Platforms and other intermediaries influence whether accessibility features survive distribution. Candidates and parties also shape participation through accessible campaign communication.

Guidance for trainers

Give groups one fictional EMB notice, television clip transcript or social-media card. Ask them to complete a task as a voter using only the supplied information. Do not turn accessibility into a checklist detached from users: ask which person encounters the barrier, what information is lost and how the design can be corrected.

Monitoring inclusive coverage

SESSION METHOD Monitoring design using Sheet 6 | TIME 15, 20 or 30 minutes

Minimum coding framework

Field	Record
Item	Unique item number, outlet or account, programme or post, date, time, URL and coder.
Topic	Main subject of the item and relevant electoral issue.
Source	Each person, organisation or document quoted, paraphrased or otherwise relied upon.
Voice	Social or professional group represented by each source and whether the person speaks directly.
Gender	Gender category only when defined by the methodology and supported by reliable information or self-identification. Record unknown rather than guessing.
Area	Geographical origin or focus, including national, regional, local or outside the country.
Actor and role	Candidate, party, official, expert, journalist, voter, civil-society representative or other role.
Identity category	Only categories defined by the methodology and supported by reliable data or self-identification. Include unknown rather than guessing.
Visibility	Duration, words, appearances, posts, prominence and direct speech.
Topic and function	Policy topic, electoral issue and whether the actor appears as decision-maker, expert, advocate, victim or witness.

Field	Record
Portrayal	Relevant policy scrutiny, stereotype, appearance or family focus, sexualisation, misgendering, discriminatory framing or other defined indicator.
Online harm	False claim, manipulated media, slur, threat, doxxing, impersonation, harassment pattern and amplification indicator.
Accessibility	Captions, transcript, interpretation, alt text, readable format, language and correction information.

The six fields Item, Topic, Source, Voice, Gender and Area provide a practical minimum drawn from the social-pluralism monitoring approach used in the source materials. Add prominence, direct speech, portrayal, accessibility or online-harm variables when the research question requires them. “Voice” identifies the social group and agency of the source; it is not the same as tone.

Denominators and comparisons

Compare like with like. Candidate coverage should be read against candidate composition and political relevance. Source diversity may use all quoted sources as the denominator. Online abuse studies may compare posts, targets or engagements, but these answer different questions. State the unit and denominator beside every percentage.

Quality control and reporting

Coding discipline

- Define indicators with positive and negative examples. Distinguish stereotype, criticism, insult, false claim, discriminatory expression and threat.
- Train coders on borderline cases and double-code a sample. Record disagreement and revise unclear definitions.
- Separate the journalist's narration, a quoted speaker and user comments. Responsibility and analytical meaning differ.
- Record unavailable or unknown identity information. Never fill a data gap by inference.
- Combine counts with close reading. A small number of prominent, sexualised attacks may matter even when the overall tone variable appears neutral.
- Protect targets and coders. Limit exposure, rotate difficult material, provide breaks and establish escalation routes.

Writing findings

Use three layers:

1. Observation: what the sample recorded.

2. Assessment: the pattern and the standard used.

3. Attribution or impact: only what evidence can support.

Example: "Within the monitored prime-time sample, women comprised 31 per cent of candidate speaking time, compared with 42 per cent of registered candidates. They were more frequently questioned about family responsibilities. The sample indicates unequal framing; it does not establish that the pattern changed voting behaviour."

Trainer debrief for Sheet 6

The proposed study should combine quantitative visibility with direct voice, topic, role and portrayal. Its online component should sample content and behaviour rather than equate engagement with public opinion. A short methodology and limitations statement is part of the result, not an appendix to be forgotten.

Editorial and institutional responses

SESSION METHOD Multi-role response simulation using Sheet 7 | TIME 5 or 15 minutes

Response ladder

1. Preserve necessary evidence and protect personal data.

2. Verify the content, source, target, distribution and applicable rule.

3. Assess urgency, especially credible threats, doxxing, stalking and election-day voter suppression.

4. Contact and support the target without placing the entire response burden on them.

5. Correct or contextualise false claims without unnecessary repetition.

6. Use platform, editorial, regulatory, equality, electoral, civil or criminal routes according to mandate and threshold.

7. Explain the decision, offer review and monitor recurrence or displacement.

Audience decisions

Audience	Practical task
Regulator or supervisory authority	Determine jurisdiction, threshold, urgency, evidence and a proportionate remedy while protecting political debate.
EMB	Deliver accessible neutral information, protect staff and candidates within mandate, and refer threats or media matters appropriately.
Judge or lawyer	Test equality, expression, privacy, safety, due process and effective remedy on the established facts.
Policymaker	Remove accessibility and enforcement gaps without vague speech restrictions or identity surveillance.
Journalist or media practitioner	Diversify voices, challenge stereotypes, verify manipulated material and report abuse without amplifying it.
Civil society or observer	Monitor consistently, support targets, document institutional response and distinguish advocacy from legal findings.

Cases, learning check and next steps

SESSION METHOD Case comparison and individual exit task | TIME 5, 10 or 15 minutes

Case comparison

Visibility without voice

A broadcaster includes women candidates in short visual sequences but reserves most interviews and policy questions for male party leaders. The issue concerns direct voice, prominence and political role, not presence alone.

Manipulated intimate image

A fabricated image targets a woman candidate and spreads through anonymous accounts. The response requires verification, evidence preservation, safety assessment and restrained correction. Do not republish the image merely to demonstrate falsity.

Inaccessible voter information

An EMB posts a deadline only in an image with small text and no accessible alternative. The information is formally public but not equally usable. Rapid correction should cover the website, social channels, broadcasters and help services.

Five-question check

1. What is the difference between visibility and direct voice?

2. Which contextual information is necessary before comparing women's and men's share of candidate coverage?

3. What distinguishes gendered disinformation from sexist abuse?

4. Name two urgent indicators in an online-harm assessment.

5. Why should unknown identity data remain unknown?

Suggested answers

Visibility means appearing; direct voice means speaking through a quotation, interview or uninterrupted contribution. Candidate composition, political standing and programme type are needed for comparison. Gendered disinformation contains a false or misleading element using gendered narratives; sexist abuse need not contain a factual claim. Credible threats, doxxing, stalking, location disclosure or rapid targeted escalation may create urgency. Unknown data should remain unknown because inferred sensitive characteristics are unreliable, intrusive and analytically misleading.

Training of trainers' guidance and assessment

Module-specific facilitation

Establish respectful language and a safe participation protocol before discussing discrimination, gendered abuse or violence. Do not require participants to disclose personal experiences. Common mistakes include measuring presence without voice, treating women or minority groups as homogeneous, reproducing abusive material unnecessarily, and reporting individual examples without showing the broader pattern. Use aggregate evidence and fictionalised cases unless identification serves a clear purpose and the affected person's safety has been considered.

Audience-specific application

Regulators and policymakers should examine systemic inclusion and available safeguards. EMBs should test accessibility and minority-language voter information. Journalists should revise sourcing, framing and newsroom response. Lawyers should analyse equality, expression and protection duties. Civil society and observers should code visibility, voice, portrayal and abuse while protecting affected persons.

Assessment and evaluation

Use a baseline prompt asking who is visible, who speaks and who remains absent. Assess the visibility-and-voice analysis, gendered-disinformation scenario, accessibility check, minimum coding framework and response plan. The case comparison and learning check provide the exit assessment.

Evidence of learning and trainer reflection

Participants meet the objective when they distinguish presence from meaningful voice, identify intersectional exclusion, propose accessible communication, code abuse without reproducing it, and select a safety-centred response. Invite an anonymous feedback response on whether the exercise felt safe and usable. Trainers should document accessibility barriers in the session itself and correct them before reuse.

Audience adaptation

Audience	Emphasis	Best technique	Output
Regulators and supervisory authorities	Mandate, evidence, thresholds, accessibility and proportionate remedies	Complaint triage and reasoned decision	Short assessment with referral or remedy
EMBs	Accessible voter information, neutrality, staff safety and coordination	Accessibility journey and incident simulation	Accessible communication and escalation plan
Judges, lawyers and policymakers	Inter-related rights, discrimination, privacy, due process and legal certainty	Moot review or legislative clinic	Structured legal test or revised provision
Journalists and media practitioners	Source diversity, portrayal, verification, newsroom safety and correction	Editorial conference	Revised story, headline and safety protocol
Civil society and observers	Sampling, documentation, target support and responsible reporting	Monitoring-design lab	Codebook, sample and limitations statement

Mixed groups

Give each professional group the same facts but a different mandate. Ask groups to state what they can do, what they cannot do and which actor should receive a referral. The plenary should expose responsibility gaps without assuming that one institution controls the whole information environment.

Facilitation safeguards

Do not invite participants to disclose personal experiences. Challenge discriminatory statements without turning a targeted participant into the group's educator. Establish ground rules on confidentiality and respectful terminology. If a scenario resembles a live case, remove unnecessary identifiers and avoid prejudging proceedings.

Recommended resources

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

2. Council of Europe, Recommendation CM/Rec(2013)1 on gender equality and media.

3. Council of Europe, Recommendation CM/Rec(2019)1 on preventing and combating sexism.

4. Council of Europe, Study on media coverage of elections with a specific focus on gender equality, 2017.

5. European Convention on Human Rights, Articles 10 and 14, and Article 3 of Protocol No. 1.

6. UN Convention on the Rights of Persons with Disabilities, particularly Articles 9, 21 and 29.

7. OSCE/ODIHR, Handbook on Observing and Promoting Women's Electoral Participation, second edition, 2023.

8. OSCE/ODIHR, Handbook on Media Monitoring for Election Observation Missions, 2012.

9. OSCE/ODIHR, Guidelines for Observation of Election Campaigns on Social Networks, 2021.

10. Elections in Digital Times: A Guide for Electoral Practitioners, supplied project resource.

11. Gendered Disinformation in Slovakia and Czechia, supplied research and long-form reports.

12. NDI, Violence Against Women in Elections: Media Monitoring tool, 2016.

Final trainer note

Update national law, institutional contacts, platform reporting routes and accessibility practice before delivery. Keep participant sheets free of outcomes. The module succeeds when participants can identify a barrier precisely, describe the evidence and select a response that improves participation without sacrificing lawful political debate.

Module 7: Inclusive and responsible coverage

Training material to be shared with participants

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EXIT TASK 29

These exercises help you assess participation, representation, safety and accessibility in electoral communication. Work from the facts supplied. Distinguish observation, assessment and legal conclusion. Do not infer personal characteristics that the evidence does not establish.

Instructions

- Use the standards and national law provided by the trainer.
- Do not repeat abusive language or display harmful images unless essential to the assessment.
- Treat names, accounts and records in the scenarios as fictional.
- Record uncertainty and identify missing evidence.
- In mixed groups, work within the mandate assigned to your role.

Ground rules

No participant must disclose personal experience or political opinion. You may request a text-only alternative to distressing content. Preserve confidentiality during discussion.

Sheet 1 Inclusion and rights map

Scenario

A national election debate is broadcast live and streamed online. The venue is inaccessible to a candidate who uses a wheelchair. The broadcaster offers remote participation but the connection is less reliable and excludes the candidate from informal follow-up exchanges. The programme has no live captions. A minority-language candidate receives interpretation only after repeated requests.

Task

For each issue, record:

1. The affected person or public interest.
2. The relevant dimension: access, presence, agency, safety or dignity.
3. The information needed before reaching a conclusion.
4. The actor able to prevent or correct the barrier.
5. A response that preserves editorial independence and meaningful participation.

Sheet 2 Visibility, voice and portrayal

Two coverage profiles

Profile A gives Candidate A 90 seconds of direct speech on taxation, experience and coalition plans. The presenter challenges the cost of the proposals.

Profile B gives Candidate B 25 seconds of direct speech. The introduction describes clothing, age and family arrangements. Two commentators discuss whether the candidate is likeable and emotionally suited to leadership. One policy proposal appears only in paraphrase.

Assume the candidates hold comparable positions in parties with similar electoral support.

Questions

1. Compare visibility, direct voice, prominence, topic and scrutiny.
2. Which features of Profile B are relevant to a finding on stereotyping or unequal framing?
3. Which criticism would remain legitimate even if expressed firmly?
4. Rewrite Profile B's introduction and first two questions using comparable editorial standards.
5. What additional sample would you need before making a finding about the outlet as a whole?

Sheet 3 Gendered disinformation and online abuse

Scenario

Three days before voting, anonymous accounts circulate a manipulated sexualised image of a woman candidate with a false claim about how she obtained office. Several accounts repeat identical text. One post publishes the telephone number of a campaign worker. A high-profile commentator shares a blurred version while condemning the attack, leading many users to search for the original.

Questions

1. Separate the observable facts from the assessments that still require evidence.
2. Identify the stereotype, false claim, manipulated media, harassment indicators and safety concern.
3. Which action is urgent and who should take it?
4. What evidence should be preserved, and what personal data should be restricted?
5. Draft a correction that does not reproduce the image or false allegation.
6. Does identical wording prove coordination? Explain what further evidence is needed.

Sheet 4 Social pluralism

Scenario

During one week, a public broadcaster airs 20 election stories. Its sources include 18 national politicians, 9 government officials, 6 business representatives, 3 civil-society representatives and 12 voters. Most expert sources are men from the capital. Women appear mainly as voters discussing household costs. One Roma representative appears in a story about public disorder. No person with a disability speaks directly. Regional stories use national commentators rather than local sources.

Questions

1. Which groups are present, absent or confined to narrow roles?

2. Which quantitative counts would help, and which qualitative indicators are necessary?

3. What can and cannot be concluded from one week?

4. Suggest four changes to source selection or production practice without prescribing a political viewpoint.

5. Which identity information should not be inferred by a monitor?

Basic coding task

Code the scenario using six fields: Item, Topic, Source, Voice, Gender and Area. For each source, record whether the person speaks directly and the social or professional role represented. Use unknown when gender or another identity characteristic cannot be recorded reliably.

Sheet 5 Accessibility test

Voter notice

The EMB publishes the final registration deadline in a social-media image. The image contains small text, low contrast and no alt text. The linked page is a scanned PDF. A video repeats the information without captions. The telephone helpline operates only during standard working hours. A later correction changes the required document but remains on a separate page.

Task

Test the chain: find, perceive, understand, act and verify.

1. Identify the barrier at each stage.
2. Who may be excluded or delayed?
3. Which corrections must occur immediately?
4. Draft a short accessible notice containing the deadline, required document, source, date and help route.
5. Propose one check that would prevent inconsistent versions.

Sheet 6 Monitoring design

Research question

Does campaign coverage provide women and men candidates with comparable opportunities to speak on substantive issues, and does online discussion expose women candidates to distinct patterns of gendered abuse or disinformation?

Design your study

Define:

- media and platform sample;
- monitoring period and collection frequency;
- unit of analysis;
- the minimum fields Item, Topic, Source, Voice, Gender and Area;
- actor and role categories and whether each source speaks directly;
- method for recording gender without guessing;
- visibility, direct speech, prominence, topic, tone and portrayal variables;
- online content and behaviour indicators;
- denominators for each percentage;
- quality-control and coder-welfare measures;
- ethical limits and personal-data safeguards.

Sheet 6 Data interpretation

Fictional results

Women comprise 40 per cent of registered candidates in the monitored parties. In prime-time candidate coverage they receive 29 per cent of speaking time and 18 per cent of live interviews. Twelve per cent of items about women mention appearance or family status, compared with 2 per cent of items about men. The online sample records 600 posts mentioning women candidates, of which 90 meet the project's gendered-abuse definition. The posts generate 25,000 interactions.

Questions

1. Which comparisons are valid and which require more information?
2. What does the 29 per cent figure show? What does it not show?
3. Can 25,000 interactions be described as 25,000 people or as public opinion?
4. What information is needed about party standing, programme type, post selection and unique users?
5. Write one observation sentence, one assessment sentence and one limitations sentence.

Sheet 7 Institutional response

Scenario

An election monitor refers the Sheet 3 material to several institutions. The media regulator can assess broadcaster conduct but not anonymous platform users. The EMB controls official voter information and candidate liaison but has no removal power. Police request evidence of credible threats. The platform offers reporting routes for impersonation, intimate imagery and personal-information exposure. A newsroom plans a report.

Role task

Work as a regulator, EMB, lawyer or judge, policymaker, newsroom, or civil-society observer.

1. State your mandate and its limits.
2. Identify the evidence you need.
3. Select immediate and longer-term actions.
4. Explain how you will protect freedom of expression, privacy, safety and due process.
5. Identify the referral needed from another actor.
6. Prepare a two-minute reasoned decision or action plan.

Exit task

Complete individually.

1. Explain the difference between visibility and direct voice.
2. Name two variables that reveal portrayal rather than quantity.
3. Distinguish gendered disinformation from sexist abuse.
4. Identify two indicators that can make an online incident urgent.
5. Explain why monitors should record an identity category as unknown rather than infer it.
6. Name one improvement you will make in your professional practice.

Personal action note

The barrier I will examine:

The evidence I will collect:

The person or organisation I should consult:

The practical change I can make:

COUNCIL OF EUROPE

HUMAN RIGHTS, DEMOCRACY AND THE RULE OF LAW



DROITS DE L'HOMME, DÉMOCRATIE ET ÉTAT DE DROIT

CONSEIL DE L'EUROPE

MODULE 7
INCLUSIVE AND RESPONSIBLE COVERAGE

Purpose and learning outcomes

- Explain inclusion as a condition for informed electoral participation
- Distinguish visibility, direct voice, prominence and portrayal
- Identify gendered disinformation, discriminatory narratives and safety risks
- Assess accessibility across media formats and platforms
- Design monitoring that combines disaggregated data with contextual analysis
- Select an ethical response within the responsible actor's mandate

90, 120 AND 180 MINUTE ROUTES

Inclusion in electoral communication

ACCESS	Can voters find, receive and understand election information?
PRESENCE	Are different groups visible as candidates, experts, officials and voters?
AGENCY	Do people speak directly, or are they mainly described by others?
SAFETY AND DIGNITY	Can people participate without discrimination, intimidation or avoidable harm?

Interrelated rights and responsibilities

FREEDOM OF EXPRESSION

Political debate includes speech that may shock or offend.

EQUALITY AND PARTICIPATION

Barriers and discriminatory treatment can silence participation.

FREE ELECTIONS

Voters need plural, accessible information to make a choice.

Read these principles together. None operates as an automatic trump card.

Sheet 1 scenario

A live election debate creates four possible barriers.

VENUE	A candidate who uses a wheelchair cannot enter
REMOTE ACCESS	The alternative connection is unreliable
CAPTIONS	The programme offers no live captions
LANGUAGE	Interpretation follows only after repeated requests

GROUP TASK | SHEET 1 | 10–20 MINUTES

Visibility, voice and portrayal

VISIBILITY	How much time, space or share of items?	**DIRECT VOICE**	Who receives quotations, interviews or uninterrupted speech?
PROMINENCE	Headlines and high-audience slots, or marginal placement?	**TOPICS**	Who discusses policy, leadership, family or identity?
PORTRAYAL	Competence and record, or stereotypes and personal traits?	**SCRUTINY**	Do comparable actors face comparable, relevant challenge?

SOURCE AUDIT | SHEET 2 | 15–30 MINUTES

Gender-responsive comparison

CANDIDATE COMPOSITION	COVERAGE SHARE	EDITORIAL CONTEXT
Who is standing and with what political relevance?	**Time, space, direct speech and interviews**	**Programme type, selection rules, topic and scrutiny**

A percentage has meaning only when its denominator and comparison are clear.

Two profiles, unequal framing

PROFILE A

90 seconds of direct speech on taxation, experience and coalition plans. The presenter challenges costs.

PROFILE B

25 seconds of direct speech. The introduction focuses on clothing, age and family. Policy appears only in paraphrase.

Gendered harm: working distinctions

GENDER STEREOTYPE	Assigns competence, morality or social roles according to gender
SEXIST OR SEXUALISED ABUSE	Degrades through sex, sexuality, body, family status or gender expression
GENDERED DISINFORMATION	Uses a false or misleading claim and a gendered narrative
SYNTHETIC MEDIA	Fabricates or alters an account, voice, image or video
HARASSMENT CAMPAIGN	Shows repetition, targeting, pile-on behaviour or cross-platform migration

Evidence and attribution

OBSERVABLE CONTENT	Post, image, wording, account and time
CONTEXT	Target, conversation, platform and election phase
PATTERN	Repetition, distribution and linked accounts
TECHNICAL INDICATORS	Provenance, alteration or automation evidence
ATTRIBUTION	Only when evidence supports the actor or organiser

Similar opinions or shared wording alone do not prove coordination.

Urgency depends on harm and specificity

REACH AND SPEED

Repetition and rapid amplification can intensify reputational and participatory harm.

SPECIFICITY AND DANGER

An address, telephone number, stalking indicator or credible threat may require immediate action even at low reach.

Assess both. Do not use engagement as the sole measure of harm.

Do not reproduce the harm

- Capture only the evidence needed and restrict personal data
- Avoid repeating slurs, intimate images or false allegations in headlines
- Offer a text summary instead of graphic material
- Seek informed consent before identifying a victim or survivor
- Preserve evidence before removal where this can be done safely

Manipulated-image scenario

Anonymous accounts circulate a manipulated sexualised image and a false claim about a woman candidate three days before voting.

- Several accounts repeat identical wording
- One post publishes a campaign worker's telephone number
- A commentator shares a blurred version while condemning the attack
- The condemnation drives users to search for the original

Slovakia and Czechia research example

OPTIONAL OR EXTENDED

The study examined more than 8,600 public posts across political events from 2022 to 2025. Platform-reported views exceeded 16 million.

SURVEY FINDING

71% of women and 38% of men in the cited Czech journalist survey reported decreased self-esteem after attacks.

These figures describe the study dataset and survey sample. They do not estimate prevalence across the whole information environment.

Narrative example: the Istanbul Convention

OPTIONAL OR EXTENDED

A documented narrative misrepresented the Convention as promoting "gender ideology" and linked it falsely to same-sex marriage or mandatory sex education.

FACTUAL CLAIM	What can the source text verify?
NARRATIVE FRAME	How is equality recast as a threat to identity or family?
POLITICAL CONTEXT	Which event or dispute gives the claim salience?
DISTRIBUTION	How does the message travel and who amplifies it?

Social pluralism

Social pluralism concerns the social experiences, communities, regions, languages, beliefs and interests represented in public communication.

COUNT PRESENCE	EXAMINE ROLE	ASSESS AGENCY
Who appears?	Expert, leader, victim, witness or voter?	Who speaks directly and about which topics?

Intersectional exclusion

Overlapping characteristics and structures can create a distinct barrier that one category alone cannot explain.

- Use categories only when they answer a defined research question
- Prefer self-identification and reliable aggregate data
- Record unknown instead of guessing from names, images or speech
- Protect sensitive personal information and avoid unnecessary exposure

Social pluralism coding

ITEM	Outlet, programme or post, date and identifier	**TOPIC**	Main subject and electoral issue
SOURCE	Person, organisation or document relied upon	**VOICE**	Social group, role and whether the source speaks directly
GENDER	Defined category supported by reliable information	**AREA**	National, regional, local or outside the country

BASIC CODING TASK | SHEET 4 | 10–20 MINUTES

Accessibility chain

FIND	Clear titles, timely publication, searchable text and workable links
PERCEIVE	Captions, transcripts, alt text, contrast and audio description
UNDERSTAND	Plain language, relevant translations and explained deadlines
ACT	Accessible forms, keyboard navigation, time and help routes
VERIFY	Date, authority, version, correction notice and consistency

Responsibilities along the information chain

EMB	Accessible, neutral and consistent official voter information
MEDIA	Accessible debates, interviews, explainers and digital publishing
PLATFORMS	Preserve accessibility features during distribution
PARTIES AND CANDIDATES	Provide campaign communication that people can use

Voter-notice accessibility test

The EMB publishes the registration deadline only in a low-contrast social-media image.

- No alt text and a scanned PDF at the link
- The video has no captions
- The helpline operates only during standard working hours
- A correction changes the required document on a separate page

Inclusive-coverage monitoring record

IDENTIFICATION	Outlet, programme, date, URL and coder	**ACTOR AND ROLE**	Candidate, official, expert, voter or other role
VISIBILITY	Duration, words, prominence and direct speech	**TOPIC AND FUNCTION**	Issue and role as decision-maker, expert, victim or witness
PORTRAYAL	Policy scrutiny, stereotype, sexualisation or discriminatory framing	**ACCESSIBILITY AND HARM**	Format barriers, false claim, threat or amplification indicator

OPTIONAL OR EXTENDED

MONITORING DESIGN | SHEET 6 | 20–30 MINUTES

Denominators and comparisons

OPTIONAL OR EXTENDED

CANDIDATE COVERAGE

Compare with candidacy, standing and programme format.

SOURCE DIVERSITY

Use all quoted sources or another declared unit.

ONLINE ABUSE

Posts, targets, views and interactions answer different questions.

State the unit and denominator beside every percentage.

Quality control and coder welfare

OPTIONAL OR EXTENDED

- Define each indicator with positive and negative examples
- Train coders on borderline cases and double-code a sample
- Separate journalist narration, quoted speech and user comments
- Combine counts with close reading of prominent or severe cases
- Limit exposure to abusive material, rotate difficult work and provide breaks
- Document unknown data, disagreements and methodological limitations

Three layers of reporting

OPTIONAL OR EXTENDED

OBSERVATION	What the defined sample recorded
ASSESSMENT	The pattern and the standard used
ATTRIBUTION OR IMPACT	Only what the available evidence can support

"Within the monitored prime-time sample, women received 31% of candidate speaking time, compared with 42% of registered candidates."

DATA INTERPRETATION | SHEET 6 | 20–30 MINUTES

Response ladder

1. Preserve necessary evidence and protect personal data
2. Verify content, source, target, distribution and rule
3. Assess urgency, especially threats, doxxing and stalking
4. Contact and support the target
5. Correct false claims without unnecessary repetition
6. Use the competent platform, editorial, regulatory or legal route
7. Explain the decision, offer review and monitor recurrence

One incident, different mandates

REGULATOR	Jurisdiction, threshold, evidence and remedy	**EMB**	Accessible information, liaison and referral
LAWYER OR JUDGE	Expression, equality, privacy, safety and due process	**POLICYMAKER**	Close gaps without vague restrictions or identity surveillance
JOURNALIST	Verify, diversify voices and avoid amplification	**CIVIL SOCIETY / OBSERVER**	Monitor, support targets and distinguish advocacy from legal findings

Three cases for comparison

OPTIONAL OR EXTENDED

VISIBILITY WITHOUT VOICE	Women appear in short sequences while male leaders receive most interviews
MANIPULATED INTIMATE IMAGE	A fabricated image spreads through anonymous accounts
INACCESSIBLE VOTER INFORMATION	An EMB publishes a deadline only in an image with no accessible alternative

Learning check

- What is the difference between visibility and direct voice?
- Which context is needed before comparing women's and men's coverage shares?
- What distinguishes gendered disinformation from sexist abuse?
- Name two indicators that can make an online incident urgent
- Why should unknown identity data remain unknown?

INDIVIDUAL EXIT TASK | 5–10 MINUTES

Audience adaptation

REGULATORS	Complaint triage and a reasoned decision
EMBs	Accessibility journey and incident simulation
LAWYERS / POLICYMAKERS	Moot review or legislative clinic
JOURNALISTS	Editorial conference and safety protocol
CIVIL SOCIETY / OBSERVERS	Monitoring-design laboratory

Trainer preparation and safeguards

- Map underrepresented groups and consult affected organisations before delivery
- Adapt identity terms and examples to the national context
- Provide printed, digital, large-print and screen-reader-friendly materials
- Set confidentiality and non-disclosure ground rules
- Offer non-exposure alternatives for distressing content
- Prepare a referral protocol for threats, doxxing or stalking

Key messages

- Inclusion concerns access, presence, agency, safety and dignity
- Headcounts need context on voice, prominence, topic and portrayal
- Accessibility and reasonable accommodation remove barriers to participation
- Gendered disinformation combines a misleading claim with gendered narratives
- Monitoring must protect sensitive data and state its denominators and limits
- Responses should preserve evidence, protect targets and avoid amplifying harm

END OF MODULE 7

Module 8: Risks violations and practical case studies

Training material to be shared with trainers only

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AUDIENCE ADAPTATION 17

RECOMMENDED RESOURCES 17

This module is the applied case laboratory for the training package. It helps participants classify election communication problems, preserve evidence, identify the applicable standard and responsible institution, assess urgency and choose a proportionate response. It draws links to the earlier modules without repeating their full conceptual or technical content.

Use the separate participant workbook for all activities. Keep the outcomes and trainer debriefs in this document. Adapt every legal conclusion to the law and institutional mandates in force in the training country. Cases marked as fictional or composite must not be presented as findings about a real person, outlet, campaign or platform.

Trainer overview

Module objective

Enable participants to distinguish risks, incidents, ethical failures, contractual policy breaches and legal violations; analyse complex cases involving several actors and rules; document findings at the level supported by evidence; and select remedies that protect electoral integrity and freedom of expression.

Learning outcomes

- Distinguish a risk signal, suspected incident, verified fact, analytical finding and legal determination.
- Separate the content, conduct, distribution system and institutional response in a case.
- Identify the legal or ethical rule, its scope, the competent body, the evidential threshold and procedural safeguards.
- Triage cases according to urgency, scale, reversibility, affected rights and proximity to voting.
- Analyse broadcast, online, advertising, disinformation, harassment and litigation cases using a common structure.
- Draft findings that distinguish observation, assessment, attribution, impact and uncertainty.
- Compare correction, reply, transparency, referral, platform action, interim measures and sanctions for proportionality and likely effectiveness.
- Coordinate across institutions while preserving their separate mandates and independence.

Session techniques and methods

Risk sorting; evidence-chain exercise; jurisdiction map; rotating case stations; newsroom or authority simulation; integrated incident room; remedy hearing; individual learning check. Assign different professional mandates to participants working on the same facts.

Duration

Standard route: 120 minutes. Condensed route: 90 minutes. Extended route: 180 minutes. Timing includes instructions, group work, reporting and debriefs but excludes breaks, interpretation and preparation. The standard route completes Sheets 1–5. The extended route adds all case stations and a reasoned remedy decision.

Relationship to other modules

Modules 2–7 supply the standards and analytical methods applied here. This module does not replace their detailed treatment of law, fairness, monitoring, manipulation, platforms or inclusion. It integrates those strands through practical cases. Module 9 develops longer-term good practice, response systems and resilience from the lessons identified here.

Preparation and route selection

Trainer checklist

- Prepare a concise national legal and institutional map. Identify regulators, EMBs, campaign-finance bodies, data-protection authorities, law-enforcement bodies, courts, equality bodies, press councils and relevant platform routes.
- Verify the rules and institutional powers in force on the date of delivery. Separate Council of Europe standards, applicable EU law, national law, self-regulation and private platform policy.
- Select cases relevant to the audience and current electoral risks. Update dates and outcomes from primary sources before using a real case.
- Provide the evidence in stages. Begin with an incomplete alert, then release documents, screenshots, monitoring data or responses as the exercise develops.
- Remove unnecessary personal data. Do not reproduce intimate images, addresses, threats or abusive material when a factual summary will serve the exercise.
- Prepare Sheets 1–7 without outcomes or trainer notes. Mark fictional and composite cases clearly.
- Establish ground rules for political neutrality, confidentiality, respectful discussion and disagreement about legal thresholds.
- Plan referral and safeguarding steps if participants disclose a live threat, attack or unresolved case.

Route table

Session	90 min	120 min	180 min
1 Risk to finding	10	15	20
2 Evidence and jurisdiction	15	20	25
3 Recurring patterns	10	15	20
4 Broadcast cases	15	20	30
5 Digital cases	20	25	35
6 Watchdog pressure	5	5	15
7 Integrated simulation	10	15	25
8 Remedies and check	5	5	10

For 90 minutes, use Sheet 1, one broadcast case, one digital case and the integrated simulation. For 120 minutes, add the evidence and jurisdiction exercises. For 180 minutes, run all stations and require written findings and remedy reasons.

Core messages that should remain constant

- A risk is a condition that may harm electoral communication. A violation requires an applicable rule, facts within its scope, a responsible actor and the legally required elements.
- Harmful, unethical or misleading conduct is not automatically unlawful. Lawful expression can still create a democratic risk, while a technical transparency breach may occur without proof that votes changed.
- Monitor behaviour and evidence, not presumed motives. Similar messages, high engagement or political benefit do not alone prove coordination, automation, payment or foreign attribution.
- Separate content from conduct. A message may be lawful while its financing, targeting, impersonation, data use or coordinated amplification breaches another rule.
- Separate institutional roles. A regulator, EMB, court, data-protection authority, police service, press council and platform may address different parts of one incident.
- Urgency depends on proximity to voting, credible danger, voter confusion and whether the harm can be reversed. Reach matters, but one specific threat or false polling instruction can require immediate action.
- Preserve evidence before it disappears, but collect only what is lawful and necessary. Protect personal data, sources, targets and monitors.
- Findings should state the sample, method, rule, facts and limitations. Avoid language that turns an indicator into a legal judgment.
- Remedies should have a lawful basis and pursue a legitimate aim through proportionate means. Consider correction, disclosure, reply or referral before coercive action where they can work.
- Document institutional inaction and delayed action as carefully as the original incident. Accountability includes reasons, notice, review and learning.

From risk signal to supported finding

SESSION METHOD Classification exercise using Sheet 1 | TIME 10, 15 or 20 minutes

Five levels

Level	Meaning	Appropriate language
Signal	An observation that justifies checking	"The repository search did not return the advertisement."
Suspected incident	Several facts indicate a possible problem	"The available records indicate possible undisclosed sponsorship."
Verified fact	Evidence establishes what occurred	"The programme aired at 20:15 and gave Candidate A four minutes of direct speech."
Analytical finding	Facts assessed under a stated method or standard	"Across the monitored sample, the outlet repeatedly favoured one contestant in tone and prominence."
Legal determination	A competent body applies law through the required procedure	"The authority found a breach of Article X after notice and review."

Risk is not violation

A lack of captions creates an accessibility barrier and may also breach a legal duty, depending on the applicable framework. A false statement may create voter confusion without meeting a prohibition. A platform may breach its own policy without breaching national law. Conversely, an advertisement can breach a financing or transparency rule even when its political message is lawful.

Guidance for trainers

Give groups short statements and ask them to identify the level and rewrite overclaiming. Insist on the actor and verb: "the monitoring recorded," "the regulator found," and "the court upheld" convey different authority.

Evidence jurisdiction and urgency

SESSION METHOD Evidence chain and jurisdiction map using Sheet 2 | TIME 15, 20 or 25 minutes

Common case file

Field	Questions
Trigger	Who reported the issue, when and through which channel?
Content	What exactly appeared or was omitted? Preserve the complete context.
Actor and conduct	Who created, paid, selected, published, amplified or failed to act? Which role is established?
Distribution	Which broadcaster, publisher, platform, recommender, advertising service or messaging channel carried it?
Time and reach	When did it occur, for how long, and what does the metric actually measure?
Rule and scope	Which provision, standard, code or platform term applies to this actor, medium, territory and period?
Harm and urgency	Which right or electoral process may be affected? Can the harm be reversed before voting?
Procedure	Which authority has jurisdiction? What notice, hearing, review and appeal are required?
Evidence limits	What remains unknown, inaccessible, disputed or dependent on third-party data?

Evidence preservation

Record the URL, account, programme, timestamp and time zone. Preserve the full item, associated label or transparency notice and the collection conditions. Keep the original capture and a working copy. Hashing, export logs or witness records may be appropriate where formal proceedings are foreseeable.

Jurisdiction and urgency map

Referral questions

Issue	Possible lead or referral route
Broadcast fairness or licence duty	Media regulator, election authority, broadcaster complaint system or court, depending on national law.
Campaign finance or third-party spending	Campaign-finance supervisor, EMB, audit body or prosecutor where authorised.
Political-ad transparency or data use	Designated digital-services, advertising or data-protection authority in applicable contexts.
Journalistic accuracy or ethics	Newsroom correction, ombudsperson, press council or court where a legal claim exists.
Threat, doxxing or stalking	Platform safety route and law enforcement where the legal threshold or immediate risk is met.
Coordinated manipulation or platform systemic risk	Platform contact, competent digital-services authority, researchers and election bodies within their mandates.

Triage factors

Score no case mechanically. Discuss proximity to voting, specificity, scale, target vulnerability, voter-information function, reversibility, recurrence and evidence fragility. A false polling-place message on election morning is urgent even with limited initial reach. A months-old repository defect may permit slower investigation but still require preservation.

Trainer debrief for Sheet 2

The same evidence packet may generate several referrals. Participants should avoid sending the whole case indiscriminately to every body. Each referral should identify the recipient's legal task, the relevant evidence and the requested action.

Recurring risk and violation patterns

SESSION METHOD Risk matrix using Sheet 3 | TIME 10, 15 or 20 minutes

Traditional and convergent media

Pattern	Risk question	Possible rule question
Editorial interference	Did an authority or owner influence selection or framing?	Is there unlawful interference, a licence duty, a governance breach or an employment issue?
Unequal access or treatment	Are comparable contestants treated by consistent criteria?	Does the applicable rule require equal, equitable, fair or impartial treatment?
State-resource advantage	Does official communication promote an incumbent?	Do election, finance, public-service or advertising rules apply?
Paid-for coverage	Does promotional content appear editorial?	Was payment disclosed and reported, and who bears responsibility?
Poll or silence-period problem	Was information published at a restricted time or without required details?	Does the rule cover this medium, actor and form of redistribution?
Inaccurate voter information	Could voters misunderstand registration, voting or results?	Which official-information, correction or offence provision applies?

Digital campaigning

Pattern	Risk question	Possible rule question
Undisclosed political advertising	Can the voter identify the sponsor, payer, purpose and targeting?	Which transparency, finance, data or platform rule applies?
Inauthentic amplification	Do accounts conceal identity or coordination?	Is there evidence of prohibited manipulation, fraud or a platform-policy breach?
Manipulated or synthetic content	Is provenance concealed and harm foreseeable?	Do labelling, impersonation, defamation, privacy or electoral rules apply?
Harassment and threats	Does conduct deter participation or endanger a person?	Does it meet a platform, civil or criminal threshold?

Pattern	Risk question	Possible rule question
Algorithmic or systemic risk	Does service design amplify electoral harm at scale?	Which due-diligence, transparency or audit duties apply?

Loopholes and responsibility gaps

Rules designed for broadcasters may not reach influencers, issue advertising, proxy pages or direct publisher sales. Platform repositories may omit misclassified advertising. One authority may see the media content but lack finance or data powers. These are responsibility gaps, not permission to invent jurisdiction.

Analysis sequence

1. Describe the conduct without a legal label.
2. Identify the actor and medium.
3. Test each plausible rule's scope and elements.
4. Identify the evidence and competent body.
5. State whether the result is a risk, possible breach or established violation.
6. Recommend a lawful response and referral.

Operational risk from the Ukraine 2019 training case

The supplied Ukraine monitoring material records a practical problem: a planned sample of ten television channels and ten online outlets became too large for twelve monitors during a highly politicised news cycle. The team reduced the online sample, simplified forms, updated the candidate list and strengthened daily reporting and quality control.

Use this as a methodology-integrity case. Changing a sample is not itself misconduct. The risk arises if changes are undocumented, politically selective, applied retrospectively or concealed in reporting. The defensible response is to record the reason, date and effect of the change, preserve comparable data, update the methodology and disclose limitations.

Case laboratory for broadcast and editorial conduct

SESSION METHOD Rotating case station using Sheet 4 | TIME 15, 20 or 30 minutes

Croatia 2009 debate case

During Croatia's 2009 presidential election, regulatory bodies interpreted equal-treatment provisions to mean that interviewing one candidate required equivalent airtime for all candidates. TV Nova divided candidates into two debate groups. Five candidates from the first group participated and one declined. Complaints from candidates assigned to the second group led the Council for Electronic Media to warn the broadcaster, after which TV Nova cancelled the second debate. The journalists' association criticised the intervention as interference with editorial policy.

Trainer task

Assign regulators, judges, lawyers, policymakers, journalists and observers different roles. Ask them to identify the wording of the applicable rule, the broadcaster's selection criteria, the complainants' disadvantage, voters' information interest and available remedies. The issue is not whether equality matters, but how to apply it without mechanically eliminating useful programming.

Suggested debrief

A proportionate approach would test transparent and reasonable participation criteria, comparable opportunity within the format, the effect of refusals and less restrictive remedies. A warning that effectively causes cancellation may reduce information available to voters. The case also demonstrates why an ambiguous "equal" requirement should distinguish debates, news judgment, free airtime and paid advertising.

Optional Iceland comparison

Use the Iceland example from Module 2 only where time permits. Ask whether a broadcaster's relevance threshold, invitation criteria and opportunity for excluded contestants to communicate were transparent and reviewable. Do not treat different national outcomes as interchangeable precedents.

Case laboratory for digital campaigning

SESSION METHOD Evidence release and multi-role assessment using Sheet 5 | TIME 20, 25 or 35 minutes

Romania 2024 and TikTok

Following the first round of Romania's presidential election, declassified information described coordinated online promotion and undisclosed influencer activity. The Constitutional Court annulled the electoral process on 6 December 2024. The European Commission separately ordered TikTok to preserve relevant data and opened formal Digital Services Act proceedings concerning election risks.

Teaching purpose

Use the case to separate:

- observed content and account behaviour;
- intelligence or platform data unavailable to ordinary monitors;
- domestic constitutional review of the electoral process;
- EU supervision of a platform's systemic-risk duties;
- proof of individual responsibility or electoral impact.

The annulment and DSA proceedings have distinct legal bases and thresholds. Neither should be presented as the routine remedy for online irregularities.

Trainer debrief

Participants should preserve public evidence, state what they cannot verify, identify the authority for each question and avoid attributing accounts or claiming causal impact without supporting evidence. Interim data preservation can be important even where the final legal assessment will take longer than the election period.

Political advertising and platform policy case

Composite scenario based on earlier modules

A civic-looking page purchases messages urging voters to reject a candidate. The platform repository categorises the messages as commercial advertising and identifies only an advertising agency. Near-identical unpaid videos appear through creators who do not disclose compensation. The campaign denies coordination. Engagement rises sharply, but unique reach and targeting data are unavailable.

Assessment points

The content's political purpose does not by itself prove the campaign paid for or controlled it. Examine sponsor and ultimate control, payer and source of funds, agency and creator contracts, beneficiary, targeting, delivery, national third-party rules and platform declarations. Record repository absence or misclassification as a discrepancy, not proof of intent.

In EU contexts, consider the Digital Services Act, Regulation (EU) 2024/900, data-protection law and national campaign-finance law as separate layers. Outside the EU, use Council of Europe standards and the applicable national framework rather than importing EU enforcement powers.

Platform policy counterpoint

YouTube's June 2023 decision to stop removing content solely for false claims about widespread fraud in past United States presidential elections illustrates another kind of risk decision: a platform may loosen a rule in the name of political expression while retaining narrower rules on voter suppression, democratic-process interference and incitement. Use it to distinguish private policy design from a legal proportionality finding. Keep the case as an optional comparison because it falls outside the Council of Europe area.

Pressure on journalists and public watchdogs

SESSION METHOD Safety and legal-pressure station using Sheet 6 | TIME 5 or 15 minutes

Forms of pressure

Election reporting may attract threats, surveillance, doxxing, accreditation restrictions, seizure or damage of equipment, cyberattacks, abusive defamation claims and strategic lawsuits against public participation. A campaign may combine reputational attacks, coordinated online amplification and legal threats.

Defamation and public-interest reporting

Political actors retain reputation and privacy rights, but public-interest debate receives strong protection. Assessment should consider the factual basis, distinction between fact and value judgment, subject's public role, journalistic diligence, seriousness of the allegation and proportionality of any remedy. Criminal or excessive sanctions can chill scrutiny.

SLAPP indicators

Recommendation CM/Rec(2024)2 describes legal actions threatened, initiated or pursued to harass or intimidate and to prevent, inhibit, restrict or penalise expression on matters of public interest and associated public participation. Indicators may include power imbalance, disproportionate claims, procedural abuse, repeated actions and a purpose or effect of silencing public participation. No single indicator automatically decides the case.

Trainer debrief for Sheet 6

Participants should separate the merits of a correction or reputation claim from possible abusive litigation features. Immediate actions may include legal and safety support, evidence preservation, source protection and coordinated referral. Public communication should avoid prejudging a court or republishing threats.

Integrated election incident simulation

SESSION METHOD Incident room using Sheet 7 | TIME 10, 15 or 25 minutes

Scenario structure

Release the scenario in three rounds:

1. A public broadcaster airs an incumbent's official event extensively, while a false polling-place message circulates online.

2. A creator discloses late that an intermediary paid for the message. A journalist investigating the payment receives a legal threat and doxxing begins.

3. The platform removes several posts without reasons, the EMB issues an inaccurate correction, and two authorities claim the other has jurisdiction.

Group roles

Regulator; EMB; campaign-finance authority; judge or lawyer; newsroom; platform or digital-services authority; civil society or observer. Each group must state its mandate, evidence, immediate action, referral and public wording.

Decision board

Question	Required answer
What is established?	Verified facts and their sources.
What remains a risk or allegation?	Missing evidence and alternative explanations.
Who acts now?	Lead body and urgent measure within mandate.
Who acts later?	Referral, investigation, review or systemic follow-up.
What is communicated?	Accurate, accessible wording that avoids amplification and prejudgment.

Findings remedies and learning check

SESSION METHOD Remedy hearing and individual check | TIME 5 or 10 minutes

Finding template

Observation: Within the defined sample or incident record, what occurred?

Applicable framework: Which standard, law, code or policy applies, and to whom?

Assessment: Which elements are supported, and at what level of confidence?

Limitations: Which evidence is missing or contested?

Response: Which actor should take what step, under which power and by when?

Remedy ladder

Evidence preservation; clarification; accessible correction; label or disclosure; right of reply; change to future format; platform report; referral; interim order; administrative or judicial sanction. The order is not automatic. Choose the measure that is lawful, timely and effective for the identified harm.

Proportionality questions

Is the measure prescribed by law? Which legitimate aim does it pursue? Is it suitable for the actual harm? Could a less restrictive measure work in time? Are notice, reasons, equality of treatment and review available? What effect will the measure have on voters' access to information?

Learning check and trainer debrief

Six-question check

1. What separates a risk from a legal violation?
2. Why should content and conduct be assessed separately?
3. What must a referral identify?
4. Name two factors that make an incident urgent.
5. Why can platform-policy enforcement and legal enforcement produce different conclusions?
6. What belongs in the limitations paragraph of a finding?

Suggested answers

A violation requires an applicable rule, facts satisfying its elements, a responsible actor and the required procedure. Lawful content may be distributed through unlawful financing, targeting or impersonation. A referral should identify the competent task, applicable rule, relevant evidence and requested action. Proximity to voting, credible danger, voter confusion, evidence disappearance and irreversibility can create urgency. Platform terms and law differ in scope, decision-maker and remedy. Limitations should identify the sample, unavailable data, disputed facts, methodological constraints and claims that cannot be made.

Trainer closing

Ask each group to revisit its first assessment. What did it initially overclaim? Which evidence changed its view? Which institution did it overlook? The central learning is disciplined decision-making under time pressure, not agreement on every borderline case.

Training of trainers' guidance and assessment

Module-specific facilitation

Run this module as a case laboratory. Release information in stages and require groups to revise their classification as evidence changes. Common mistakes include treating a signal as a verified fact, confusing an analytical finding with a legal determination, choosing a remedy before identifying jurisdiction, and allowing urgency to lower the evidentiary standard. Assign roles with different mandates and prevent the most powerful institution from speaking for the whole group.

Audience-specific application

Regulators should classify incidents and select proportionate remedies. EMBs should protect essential voter information. Judges and lawyers should test authority, evidence and due process. Journalists should decide how to report without amplifying an unsupported claim. Civil society and observers should preserve evidence and refer responsibly. Policymakers should identify structural gaps revealed by the case.

Assessment and evaluation

Use a short classification task as the baseline. Assess whether participants distinguish signal, suspected incident, verified fact, analytical finding and legal determination; apply the evidence-jurisdiction-urgency framework; preserve evidence; and select a remedy from the appropriate level. The integrated simulation and final written finding provide the exit assessment.

Evidence of learning and trainer reflection

Participants meet the objective when they update conclusions as new evidence arrives, name the competent decision-maker, separate protective action from final determination, and justify a proportionate remedy with safeguards. Use structured peer feedback on evidence, authority and rights impact. Trainers should record where roles or scenario facts need national adaptation.

Audience adaptation

Audience	Emphasis	Best technique	Output
Regulators and supervisory authorities	Jurisdiction, thresholds, evidence, due process and remedy	Complaint triage and reasoned decision	Short decision with referral map
EMBs	Accurate voter information, neutrality, incident coordination and mandate limits	Election incident room	Correction and escalation protocol
Judges, lawyers and policymakers	Legal characterisation, evidence, proportionality and gaps	Moot hearing or drafting clinic	Legal test or revised provision
Journalists and media practitioners	Verification, editorial independence, safety, reply and correction	Newsroom conference	Publication and safety decision
Civil society and observers	Monitoring discipline, public wording and institutional accountability	Case-file audit	Evidence note with limitations

Mixed groups

Give every group the same evidence but a different mandate. Require each to name one action it can take, one action it cannot take and one referral. In the plenary, compare whether the combined response leaves a protection or accountability gap.

Facilitation guidance

Cases should be difficult enough to permit reasonable disagreement. Do not reward the group that proposes the harshest sanction. Reward accurate classification, evidence discipline, lawful authority, timely action and clear reasons.

Recommended resources

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

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

3. European Convention on Human Rights, Articles 8, 10 and 14, and Article 3 of Protocol No. 1.

4. Council of Europe, Recommendation CM/Rec(2016)4 on the protection of journalism and safety of journalists and other media actors.

5. Council of Europe, Recommendation CM/Rec(2024)2 on countering the use of strategic lawsuits against public participation.

6. OSCE/ODIHR, Handbook on Media Monitoring for Election Observation Missions, 2012.

7. OSCE/ODIHR, Guidelines for Observation of Election Campaigns on Social Networks, 2021.

8. 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, 2024.

9. Regulation (EU) 2022/2065, Digital Services Act, for applicable EU contexts.

10. Regulation (EU) 2024/900 on transparency and targeting of political advertising, for applicable EU contexts.

11. JUFREX Freedom of Expression Training Handbook, supplied project resource.

12. Ukraine 2019 media-monitoring training and operational materials, supplied project resources.

13. Armenia 2023 assessment and training reports, supplied project resources.

14. Module 2 Croatia and Iceland case materials and the Module 5–7 research examples.

Final trainer note

Before delivery, verify every real case against primary records and update later procedural developments. Preserve the distinction between a source's allegation, a monitor's assessment and a competent body's decision. Keep participant case files free of outcomes. Feed the institutional and systemic lessons into Module 9.

Module 8: Risks violations and practical case studies

Training material to be shared with participants

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FINDING AND LEARNING CHECK 24

Purpose

These exercises help you classify election communication problems, test evidence, identify the applicable framework and responsible institution, and select a proportionate response. Work only from the facts supplied and record what remains unknown.

Instructions

- Distinguish observation, analytical assessment and legal determination.
- Separate content, conduct, distribution and institutional response.
- Use the national law and institutional map supplied by the trainer.
- Do not infer motive, payment, coordination, automation, attribution or electoral impact without evidence.
- Protect personal data and do not reproduce harmful content unnecessarily.
- Work within the mandate assigned to your group.

Output for each case

Prepare a short note stating: established facts; risk or alleged breach; applicable rule; missing evidence; competent body; urgent step; longer-term response; and limitations.

Sheet 1 Risk signal or violation

Classify and rewrite

For each statement, classify it as a signal, suspected incident, verified fact, analytical finding or legal determination. Rewrite any statement that claims more than the evidence supports.

1. “The platform interfered in the election because one monitored account received five recommended videos supporting Candidate A.”

2. “The public broadcaster gave Candidate A 42 minutes and Candidate B 11 minutes during the monitored prime-time news sample.”

3. “The advertisement was illegal because it did not appear in the repository search conducted on election day.”

4. “The press council found that the headline breached its accuracy code after considering the publisher’s response.”

5. “Identical wording in twelve posts proves a foreign bot operation.”

6. “The voter-information video contained no captions when captured at 14:00.”

Reflection

Which items may still represent a democratic or ethical risk even if no legal violation is established?

Sheet 2 Evidence and jurisdiction

Alert

An observer reports that a social-media post gives the wrong deadline for voter registration. A local broadcaster repeats the claim in a live interview. The candidate who made the claim later deletes the post. The EMB website contains two versions of the deadline. A platform screenshot shows 18,000 “views”, but its definition is unavailable.

Task

1. List verified facts and unverified claims.

2. Identify evidence to preserve immediately.

3. Define the voter-information harm and urgency.

4. Map the possible responsibilities of the candidate, broadcaster, EMB and platform.

5. Identify the lead action and any referrals.

6. Draft a correction that is accurate, accessible and does not repeat the confusion.

7. State what the 18,000-view metric does not establish.

Comparative question

Would a converged regulator or a split institutional model handle this incident differently? Map the necessary cooperation and referrals. Do not assume that either structure is automatically more independent or effective.

Sheet 3 Risk matrix

Scenarios

A. A ministry's "public information" advertisements praise achievements using the governing party's campaign slogan.

B. A newspaper publishes a paid candidate profile in its news layout without a label.

C. A creator promotes an issue central to the election and says no money changed hands, but received travel and production support from an intermediary.

D. A candidate faces insulting memes and one post containing a home address and a specific threat.

E. A regulator sees political advertisements in a platform repository but lacks campaign-finance powers.

Matrix

For each scenario identify: content; conduct; actor; medium; risk; possible rule; missing evidence; competent body; urgency; and proportionate response.

Sheet 4 Broadcast debate case

Croatia 2009

A private broadcaster divides presidential candidates into two debate groups. Five candidates in the first group participate and one declines. Some candidates in the second group complain that the format violates a legal requirement of equal treatment. The regulator warns the broadcaster that interviewing some candidates requires equal airtime for all. The broadcaster cancels the second debate.

Role task

Work as regulator, judge, broadcaster's lawyer, excluded candidate's lawyer, policymaker, journalist or observer.

1. Identify the purpose and possible meanings of "equal treatment".

2. Which facts about selection criteria, invitations and format are necessary?

3. What are the interests of voters, contestants and the broadcaster?

4. Which less restrictive remedy could address unfairness?

5. Draft a two-minute decision or argument within your role.

6. If you are the policymaker, rewrite the ambiguous rule for debates.

Sheet 5 Digital campaign case

Initial evidence

A civic-looking page buys online messages urging voters to reject Candidate B. The platform repository categorises them as commercial advertisements and identifies an advertising agency but no ultimate sponsor. Creators publish near-identical unpaid-looking videos. They do not disclose compensation. Candidate A's campaign denies any involvement. Public engagement rises rapidly.

Questions

1. What is observable?
2. Which facts would establish political advertising, payment, sponsorship, beneficiary or coordination?
3. Which repository, contract, finance, targeting and account records should be sought?
4. What can engagement show, and what can it not show?
5. Separate national law, applicable EU law and platform policy.
6. Draft a careful interim finding.

Sheet 5 Further evidence

The agency confirms that a third-party association paid it. The association's director previously advised Candidate A but denies current coordination. Two creators disclose free production support. Repository data provide impression and spending ranges but no unique reach. Several advertisements disappear after a platform-policy report. The campaign-finance authority says it oversees contestants but may lack power over the association.

Updated task

1. Which findings can now be strengthened?
2. What still does not prove campaign control or intent to evade rules?
3. Which authority should examine spending, data use, advertising transparency and platform conduct?
4. Is removal enough, or are disclosure, correction, preservation or investigation also needed?
5. Identify one responsibility gap and propose a lawful longer-term solution.

Platform-cooperation prompt

An authority sends platforms an election-compliance questionnaire. Some responses arrive one or two months later and another platform declines to answer. What must you know about the authority's legal powers before characterising the response? Which information is urgent before voting, what should be preserved, and which limitations should appear in a public finding?

Sheet 6 Pressure on a journalist

Scenario

A journalist publishes evidence that an intermediary paid creators during the campaign. The intermediary demands immediate deletion and threatens a high-value defamation claim. Anonymous accounts publish the journalist's telephone number and workplace schedule. The article contains one minor date error that does not alter its central finding. The editor considers removing the whole investigation.

Questions

1. Separate the merits of the correction request from possible intimidation or SLAPP indicators.

2. Which public-interest, factual-basis and journalistic-diligence questions matter?

3. Which safety steps are urgent?

4. Which evidence should be preserved and who should receive referrals?

5. Propose a response to the date error that does not concede unsupported allegations.

6. What procedural safeguards might be relevant if litigation begins?

Authority prompts

- How does the protection of reputation interact with Article 10 in public-interest reporting?
- Should a head of state or senior office-holder receive greater protection from criticism than another public figure?
- Can a public authority claim an institutional reputation in its own name? Check the national law and relevant ECtHR case law before deciding.

Sheet 7 Integrated incident simulation

Round 1

Forty-eight hours before voting, a public broadcaster gives extensive live coverage to an official event featuring the incumbent. A false polling-place message begins circulating through local groups. The EMB has not yet responded.

Group task

Work as regulator, EMB, campaign-finance authority, judge or lawyer, newsroom, platform or digital-services authority, or civil-society observer.

1. State your mandate and limits.

2. Identify evidence and urgency.

3. Select one immediate action and one referral.

4. Draft one public sentence.

Sheet 7 Rounds 2 and 3

Round 2

A creator discloses that an intermediary paid for the polling-place message. A journalist investigating the payment receives a legal threat. Anonymous users begin publishing the journalist's personal information.

Round 3

The platform removes several posts without giving reasons. The EMB issues a correction containing a new error. Two public authorities say the other body has jurisdiction.

Final decision

Prepare a joint response table covering:

- established facts and unresolved allegations;
- immediate protection of voters and the journalist;
- evidence preservation;
- correction and communication;
- lead institution and referrals;
- due process and review;
- post-election investigation and prevention.

Sheet 7B Short incident-room alternative

Scenario: “The election results may have been manipulated”

Use this exercise only when the trainer selects the shorter 90-minute route. Work as media, the EMB, the media regulator, or civil society and fact-checkers.

Round 1

Soon after preliminary results are announced, posts claim that unexplained changes in the online results table prove manipulation. Screenshots circulate without timestamps, and no original data file is attached.

Round 2

The EMB confirms that a formatting error affected the public display but says the underlying tabulation was unchanged. A television programme repeats the allegation before receiving the EMB response. Engagement rises and several accounts use identical wording.

Round 3

The EMB publishes corrected tables but does not explain the change log. A platform labels some posts and removes others without reasons. Observers request access to the original records.

Four-role task

For each round state: what is established; what remains alleged; which evidence must be preserved; what your institution can and cannot do; the immediate communication or correction; referrals; and the next review point. Do not infer coordination, platform wrongdoing or manipulation of the result from the claim alone.

Finding and learning check

Draft a finding

Observation:

.....

Applicable framework:

.....

Assessment and confidence:

.....

Limitations:

.....

Immediate response and responsible actor:

.....

Longer-term follow-up:

.....

Six-question check

1. What separates a risk from a legal violation?
2. Why should content and conduct be assessed separately?
3. What must a referral identify?
4. Name two factors that make an incident urgent.
5. Why may platform and legal decisions differ?

6. Which limitation most changed your assessment today?

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DROITS DE L'HOMME, DÉMOCRATIE ET ÉTAT DE DROIT

CONSEIL DE L'EUROPE

MODULE 8
RISKS, VIOLATIONS AND PRACTICAL CASE STUDIES

Purpose and learning outcomes

- Distinguish a risk signal, suspected incident, verified fact, analytical finding and legal determination
- Separate content, conduct, distribution and institutional response
- Identify the applicable rule, responsible body and evidential threshold
- Triage urgency, scale, reversibility and proximity to voting
- Draft findings that state evidence, uncertainty and limitations
- Select a lawful, timely and proportionate response

90, 120 AND 180 MINUTE ROUTES

Risk and violation

RISK

A condition or conduct that may harm electoral communication.

VIOLATION

Facts satisfy an applicable rule's elements through the required procedure.

Harmful or unethical conduct is not automatically unlawful.

Five levels of assessment

SIGNAL	An observation that justifies checking
SUSPECTED INCIDENT	Several facts indicate a possible problem
VERIFIED FACT	Evidence establishes what occurred
ANALYTICAL FINDING	Facts assessed under a stated method or standard
LEGAL DETERMINATION	A competent body applies law through procedure

Overclaiming to remove

"Identical wording in twelve posts proves a foreign bot operation."

Supported version

"Twelve posts used identical wording. The available evidence does not establish coordination, automation or attribution."

Common case file

TRIGGER	Who reported the issue, when and through which channel?
CONTENT	What appeared or was omitted, in its complete context?
ACTOR AND CONDUCT	Who created, paid, published, amplified or failed to act?
DISTRIBUTION	Which broadcaster, publisher, platform or messaging channel?
RULE AND SCOPE	Which rule covers this actor, territory, medium and period?

Evidence preservation

- Record URL, account, programme, timestamp and time zone
- Preserve the complete item, label, transparency notice and collection conditions
- Keep the original capture and a working copy
- Use export logs, hashes or witness records where formal proceedings are foreseeable
- Collect only what is lawful and necessary
- Protect personal data, sources, targets and monitors

Jurisdiction map

BROADCAST FAIRNESS	Media regulator, election authority, complaint system or court
CAMPAIGN FINANCE	Finance supervisor, EMB, audit body or prosecutor where authorised
POLITICAL ADS AND DATA	Digital-services, advertising or data-protection authority
JOURNALISTIC ETHICS	Newsroom, ombudsperson, press council or court
THREATS OR DOXXING	Platform safety route and law enforcement where thresholds are met

Urgency factors

PROXIMITY	How close is voting or a legal deadline?
SPECIFICITY	Is the claim or threat concrete?
REVERSIBILITY	Can the harm be corrected in time?
VOTER FUNCTION	Could people misunderstand where, when or how to vote?
EVIDENCE FRAGILITY	Will the record disappear?
RECURRENCE	Is the incident repeating or moving across channels?

Converged and divided institutions

OPTIONAL OR EXTENDED

EXTENDED OR CONVERGENT

Examples in the supplied material include Ofcom, the Netherlands Media Authority and France's Arcom.

DIVIDED RESPONSIBILITIES

Bulgaria divides relevant functions between the media regulator and Central Election Commission.

Structure alone does not determine effectiveness or independence.

Recurring risks in traditional media

EDITORIAL INTERFERENCE	Influence over selection or framing
UNEQUAL TREATMENT	Inconsistent criteria for comparable contestants
STATE-RESOURCE ADVANTAGE	Official communication promotes an incumbent
PAID-FOR COVERAGE	Promotional content appears editorial
VOTER INFORMATION	Inaccurate registration, voting or results information

Recurring risks in digital campaigning

UNDISCLOSED ADVERTISING	Sponsor, payer, purpose or targeting remains hidden
INAUTHENTIC AMPLIFICATION	Accounts conceal identity or coordination
MANIPULATED CONTENT	Provenance is concealed and harm foreseeable
HARASSMENT AND THREATS	Conduct deters participation or creates danger
SYSTEMIC RISK	Service design may amplify electoral harm at scale

Responsibility gaps

A gap in authority does not create permission to invent jurisdiction.

- Broadcast rules may not reach influencers, issue advertising or proxy pages
- Repositories may omit misclassified advertisements
- One authority may see the content but lack finance or data powers
- A referral or cooperation protocol may be necessary
- Longer-term reform still requires legal certainty and procedural safeguards

Ukraine 2019 methodology-integrity case

OPTIONAL OR EXTENDED

PLANNED SAMPLE	OPERATIONAL RESPONSE
Ten television channels and ten online outlets for twelve monitors	**Reduced online sample, simpler forms, updated candidate list and stronger daily quality control**

A sample change becomes problematic when it is selective, retrospective, concealed or undocumented.

Croatia 2009 debate case

A private broadcaster divided presidential candidates into two debate groups.

- Five candidates in the first group participated and one declined
- Candidates in the second group complained under an equal-treatment rule
- The regulator warned the broadcaster
- The broadcaster cancelled the second debate

Croatia: competing interests

CONTESTANTS	VOTERS	BROADCASTER
Comparable opportunity and transparent criteria	**Useful information and meaningful debate**	**Editorial independence and a workable format**

Test refusals, disadvantage and less restrictive remedies before compelling identical airtime.

Romania 2024 and TikTok

DOMESTIC ELECTION REMEDY

The Constitutional Court annulled the electoral process on 6 December 2024.

PLATFORM SUPERVISION

The European Commission ordered data preservation and opened DSA proceedings.

The legal bases, evidence and thresholds remain separate.

Digital campaign case: initial evidence

- A civic-looking page buys messages urging voters to reject Candidate B
- The repository categorises them as commercial and identifies only an agency
- Creators publish near-identical videos without disclosing compensation
- Candidate A's campaign denies involvement
- Public engagement rises rapidly

Digital campaign case: further evidence

- A third-party association paid the agency
- Its director previously advised Candidate A but denies current coordination
- Two creators disclose free production support
- Repository data show ranges, not unique reach
- Several ads disappear after a platform-policy report
- The finance authority may lack power over the association

Platform cooperation and timing

OPTIONAL OR EXTENDED

Ahead of Slovakia's 2024 presidential election, the media regulator circulated a compliance questionnaire to platforms.

PRACTICAL LIMIT

Responses could take one or two months, and some platforms declined to answer.

Before calling non-response unlawful, establish whether the authority had a binding information power.

Pressure on journalists and watchdogs

REPUTATIONAL ATTACK	Public smears and coordinated amplification
SAFETY THREAT	Doxxing, stalking, surveillance or equipment attacks
ACCESS RESTRICTION	Accreditation or information barriers
LEGAL PRESSURE	Defamation threats or abusive proceedings
DIGITAL ATTACK	Account compromise, cyberattack or impersonation

Defamation and public-interest reporting

- Political actors retain reputation and privacy rights
- Public-interest and political debate receive strong Article 10 protection
- Assess factual basis, fact versus value judgment and journalistic diligence
- Consider the subject's public role and seriousness of the allegation
- Special protection for senior office-holders can suppress legitimate criticism
- Excessive sanctions can chill scrutiny

SLAPP indicators and safeguards

INDICATORS	SAFEGUARDS
Power imbalance	Legal and safety support
Disproportionate claims	Evidence and source protection
Repeated or abusive procedure	Early dismissal where applicable
Silencing purpose or effect	Proportionate costs and remedies

Integrated incident simulation

ROUND 1	Incumbent event dominates live coverage; false polling-place message spreads
ROUND 2	Paid intermediary emerges; journalist receives legal threat and doxxing
ROUND 3	Platform removes posts without reasons; EMB correction contains a new error

INCIDENT ROOM | SHEET 7 | 10–25 MINUTES

Incident-room decision board

ESTABLISHED	Verified facts and their sources
UNRESOLVED	Missing evidence and alternative explanations
ACT NOW	Lead body and urgent measure within mandate
ACT LATER	Referral, investigation, review or systemic follow-up
COMMUNICATE	Accurate and accessible wording without prejudgment

Short incident-room alternative

OPTIONAL OR EXTENDED

“The election results may have been manipulated.”

ROUND 1	Screenshots show unexplained changes but lack timestamps or source data
ROUND 2	The EMB reports a display error; television repeats the allegation
ROUND 3	Corrected tables lack a change log; platform actions lack reasons

Finding template

OBSERVATION	What occurred within the defined sample or incident record?
FRAMEWORK	Which standard, law, code or policy applies, and to whom?
ASSESSMENT	Which elements are supported, and at what confidence?
LIMITATIONS	Which evidence is missing, disputed or unavailable?
RESPONSE	Which actor should take what step, under which power and by when?

Remedy ladder

1. Evidence preservation
2. Clarification
3. Accessible correction
4. Label or disclosure
5. Right of reply
6. Change to future format
7. Platform report or referral
8. Interim order
9. Administrative or judicial sanction

Proportionality questions

- Is the measure prescribed by law?
- Which legitimate aim does it pursue?
- Is it suitable for the actual harm?
- Could a less restrictive measure work in time?
- Are notice, reasons, equal treatment and review available?
- What effect will it have on voters' access to information?

Learning check

- What separates a risk from a legal violation?
- Why should content and conduct be assessed separately?
- What must a referral identify?
- Name two factors that make an incident urgent
- Why may platform and legal decisions differ?
- What belongs in the limitations paragraph?

INDIVIDUAL CHECK | 5–10 MINUTES

Audience adaptation

REGULATORS	Complaint triage and a reasoned decision
EMBs	Election incident room and correction protocol
LAWYERS / POLICYMAKERS	Moot hearing or drafting clinic
JOURNALISTS	Newsroom conference and safety decision
CIVIL SOCIETY / OBSERVERS	Case-file audit with limitations

Trainer preparation and safeguards

- Verify current rules, cases, institutions and platform routes before delivery
- Release evidence in stages and keep outcomes out of participant sheets
- Remove unnecessary personal data and avoid reproducing threats or intimate material
- Set neutrality, confidentiality and respectful-discussion ground rules
- Prepare referrals if participants disclose a live threat or unresolved case
- Use difficult cases that permit reasonable disagreement

Key messages

- A risk becomes a violation only when facts satisfy an applicable rule
- Content, conduct, distribution and institutional response require separate analysis
- Urgency depends on timing, danger, voter confusion, reversibility and fragile evidence
- No single institution controls the entire information environment
- Findings must distinguish observation, assessment, attribution, impact and uncertainty
- Remedies need lawful authority, due process and proportionality

END OF MODULE 8

Module 9: Good practices response strategies and building resilience

Training material to be shared with trainers only

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This module turns the standards, monitoring findings and case lessons from Modules 2–8 into practical arrangements for prevention, timely response and institutional learning. It does not prescribe one model for every country. Participants should build measures around the national legal framework, institutional mandates, media environment, platform use and identified electoral risks.

Use the separate participant workbook for all activities. Keep suggested outcomes and debriefs in this trainer document. A response protocol should protect voters and participants without creating an informal authority to decide political truth, direct editorial choices or bypass legal safeguards.

Trainer overview

Module objective

Enable participants to design lawful, coordinated and proportionate responses to problems in electoral communication; communicate verified findings clearly; convert monitoring into usable recommendations; and establish review, preparedness and learning arrangements that strengthen resilience across election cycles.

Learning outcomes

- Explain resilience as the capacity to anticipate, withstand, respond to and learn from disruption while preserving rights.
- Translate risk assessments into responsibilities, evidence rules and escalation thresholds.
- Distinguish monitoring, urgent voter protection, enforcement, platform action and longer-term reform.
- Draft timely, accessible and evidence-based corrections and public updates.
- Convert monitoring into concise findings with relevant examples and clear limitations.
- Draft implementable recommendations and turn after-action lessons into tested improvements.

Session techniques and methods

Cycle mapping; protocol clinic; escalation and correction exercises; report editing; recommendation test; multi-stakeholder simulation; after-action review. Mixed groups work from the same evidence while retaining different mandates.

Duration

Standard route: 120 minutes. Condensed route: 90 minutes. Extended route: 180 minutes. Timing includes instructions, group work, reporting and debriefs but excludes breaks, interpretation and preparation. The condensed and standard routes use the short capstone simulation in Sheet 8a; the extended route uses the full simulation in Sheet 8b and adds a written institutional action plan.

Relationship to other modules

Module 1 introduces the core concepts and actors. Modules 2–7 provide the legal, fairness, monitoring, manipulation, platform and inclusion foundations. Module 8 supplies incident classification, evidence discipline and remedy selection. Module 9 asks what institutions and practitioners should prepare before an election, do during an incident and improve after the election.

Preparation and route selection

Trainer checklist

- Prepare a national responsibility map covering regulators, EMBs, campaign-finance and data-protection authorities, courts, law enforcement, equality bodies, public service media, press councils, platforms, journalists' organisations, fact-checkers, researchers, civil society and observers.

- Verify current laws, platform routes and institutional contact points shortly before delivery. Separate binding duties from voluntary cooperation and informal practice.
- Select two or three recurring risks from the national context. Include at least one traditional-media and one digital-environment issue.
- Prepare a neutral evidence packet with timestamps, source records, monitoring data and missing-information notes. Remove unnecessary personal data and harmful material.
- Ask whether existing protocols include accessibility, minority languages, gendered attacks, journalist safety and protection of confidential sources.
- Define who may issue authoritative voter information, who may assess media compliance and who may only refer or recommend.
- Prepare participant Sheets 1–7 and 8a–8b without the suggested debriefs in this document.
- Arrange a confidential route for participants who disclose a current threat or unresolved incident.

Route table

Session	90 min	120 min	180 min
1 Resilience cycle	10	10	15
2 Preparedness	15	20	25
3 Response protocols	15	20	30
4 Public communication	15	20	25
5 Reporting and recommendations	15	20	30
6 Media and civil society	5	10	15
7 Review and learning	5	10	15
8 Simulation and plan	10	10	25

For 90 minutes, use Sheets 1–4 and the short simulation in Sheet 8a. For 120 minutes, add the reporting and after-action exercises and retain Sheet 8a. For 180 minutes, complete every sheet, use the full simulation in Sheet 8b and require a written protocol and action plan.

Core messages that should remain constant

- Resilience is not the absence of conflict, criticism or harmful content. It is the ability to protect electoral rights and reliable information while institutions continue to act lawfully and credibly.
- Preparedness begins before the campaign. Mandates, contacts, evidence standards, accessibility needs and escalation thresholds should not be improvised during an incident.
- Cooperation does not merge mandates. Each participant should know what it can decide, what it can request and where it must refer.
- Rapid response must remain evidence based. Speed does not justify unsupported attribution, unnecessary removal, informal censorship or denial of due process.
- Authoritative voter information should come from the competent election body. Other actors can verify, contextualise, distribute and make it accessible without presenting themselves as the final legal authority.
- A correction should reach the affected audience through the channels where confusion occurred. Quietly changing a webpage may not reverse widely distributed false information.
- Monitoring has value when it produces timely, understandable and actionable findings. Volume of data is not a substitute for relevance or methodological transparency.
- A recommendation should address a demonstrated problem and identify who can act. It should not ask an institution to exercise powers it does not possess.
- Resilience requires inclusion. A response that does not reach linguistic minorities, persons with disabilities or groups targeted by harassment may deepen the original harm.
- Post-election review should examine institutional response as well as the originating incident. Record delays, gaps, successful cooperation and unintended effects.

Resilience as an election cycle

SESSION METHOD Cycle mapping using Sheet 1 | TIME 10 or 15 minutes

Four connected functions

Function	Practical question
Anticipate and reduce risk	What foreseeable weakness can be addressed before the campaign?
Withstand disruption	Which essential information and institutional functions must continue during pressure or failure?
Respond and recover	Who corrects, protects, preserves evidence, decides and communicates?
Learn and adapt	What must change in law, procedure, capacity, technology or professional practice?

Rights-based resilience

Measures should preserve freedom of expression, pluralism, privacy, political participation, non-discrimination and effective remedies. Building resilience does not mean removing every disputed statement. It means reducing vulnerabilities, improving reliable information and ensuring that lawful institutions can respond proportionately.

Guidance for trainers

Ask groups to place one lesson from Module 8 in each part of the cycle. The same event can produce different actions: an election-day correction, post-election investigation, revised cooperation protocol and future public-information campaign.

Preparedness and responsibility mapping

SESSION METHOD Protocol clinic using Sheet 2 | TIME 15, 20 or 25 minutes

Minimum preparedness map

Element	Questions to settle before the campaign
Risk picture	Which media and information risks are plausible, who may be affected and which services are essential?
Authority	Who has the legal power to decide, request information, order a remedy or hear an appeal?
Contact	Which named operational contact and backup are available during the election period?
Evidence	What information must be preserved, in which format, under which security and data rules?
Threshold	What triggers routine review, urgent escalation, safety intervention or public correction?
Communication	Who speaks, through which channels and in which accessible languages and formats?
Continuity	What happens during power, connectivity, staffing, cyber or platform-access failure?
Review	When will the protocol be tested, updated and evaluated?

Internal and external preparation

Internal preparation includes staffing, training, decision records, secure evidence handling, quality control, backup channels and approval rules. External preparation includes contact arrangements, referral forms, public explanations of mandates, cooperation exercises and predictable routes for complaints or urgent alerts.

Independence and safeguards

A cooperation arrangement should be public or capable of public explanation. It should identify the legal basis, participating bodies, information exchanged, data-retention rules, confidentiality, decision ownership, response time and review mechanism. Informal contact can speed up verification, but it must not permit political direction of journalism, secret content orders or transfer of protected data without authority.

Continuity and crisis planning

The International IDEA material on elections during emergencies emphasises comprehensive risk assessment, crisis procedures, contingency planning, adequate resources and post-event learning. Apply that logic to the information environment. Prepare for unavailable websites, compromised accounts, inaccessible platform tools, sudden staff absence, physical danger and overloaded complaint systems. Test backup publication and verification channels before the election.

Trainer debrief for Sheet 2

The strongest maps make gaps visible. If no body can compel platform data, record that limitation and prepare preservation requests, voluntary contacts and referrals; do not pretend that a cooperation agreement creates legal power. If two bodies share responsibility, set the handover point and who communicates during the gap.

Response protocols and coordination

SESSION METHOD Escalation exercise using Sheet 3 | TIME 15, 20 or 30 minutes

Common response sequence

1. Receive and log the alert with time, source and handling restrictions.
2. Preserve the original evidence and verify essential context.
3. Classify the issue, affected right, urgency and confidence level.
4. Identify the competent decision-maker and any immediate protection duty.
5. Select the least restrictive effective response available in time.
6. Refer only the questions that fall within another body's mandate.
7. Communicate what is known, unknown and being done.
8. Record reasons, review the result and retain material lawfully.

Escalation levels

Level	Typical condition	Response posture
Routine	Limited harm, reversible, no immediate safety or voting risk	Log, verify, monitor and address through ordinary procedure.
Priority	Recurring or growing problem with credible evidence	Accelerate assessment, contact relevant actor and prepare corrective action or referral.
Urgent	Specific threat, false voting instruction, major service failure or rapidly irreversible harm	Protect people or voter access immediately, preserve evidence, activate senior contacts and publish verified information.

Level	Typical condition	Response posture
Systemic	Repeated incidents reveal a structural design, capacity or accountability failure	Combine immediate response with investigation, oversight and reform planning.

Urgency and evidence

Escalation level and evidence level are independent. A claim can require an urgent response—protecting voters or a threatened journalist—while the underlying matter is still only a suspected incident. Do not wait for a legal determination before taking immediate protective action, and do not let urgency turn a signal into a verified fact.

Coordination without a ministry of truth

No coordination group should decide which political opinions are acceptable. Its legitimate functions may include verifying official electoral facts, routing evidence, protecting people, coordinating lawful institutional action and explaining procedures. Each body remains responsible for its own decision and reasons.

Information-sharing test

Before sharing information, ask: Is sharing necessary for a defined task? Does the recipient have a relevant mandate? What minimum data are required? Are sources, journalists, complainants and targeted persons protected? Must the subject receive notice? How long may the information be retained? Can the exchange and resulting action be reviewed?

Lessons from earlier modules

- Croatia 2009: an over-rigid remedy may reduce useful information; protocols should include proportionality and editorial-independence checks.
- Ukraine 2019 monitoring (CoE-commissioned methodology and training, Kužel and Burmahin, ahead of the 2019 presidential and parliamentary elections): a monitoring project conducted in an active hybrid-conflict information environment shows why changes to a sample or method must be documented and their effect disclosed, rather than left to appear as concealed operational pressure.
- Romania 2024: evidence preservation may be urgent even when the final legal and causal assessment requires more time.
- Slovakia 2024: voluntary platform responses may arrive too late; distinguish a contact route from an enforceable information power.

Trainer debrief for Sheet 3

Reward groups that define decision ownership and limits. A referral saying “please investigate” is weaker than one identifying the incident, rule question, evidence, urgency and requested act. Require a record of both action and inaction.

Public communication and corrective action

SESSION METHOD Correction-writing laboratory using Sheet 4 | TIME 15, 20 or 25 minutes

Communication principles

Public communication should be accurate, timely, accessible and limited to what the institution can establish. It should name the authoritative source, explain the practical action voters should take and state when the next update will follow. Avoid repeating a falsehood in a dramatic headline, speculating about motive or claiming that an investigation has already established a violation.

Correction structure

Component	Example function
Verified position	State the correct voting information or confirmed fact first.
Source and time	Identify the responsible authority and when the information was verified.
Practical instruction	Tell voters where to check, vote, register or obtain assistance.

Component	Example function
Reach and accessibility	Publish through relevant broadcast, online and direct channels in usable formats and languages.
Uncertainty	Separate unresolved allegations from established facts.
Next update	Give a realistic time or condition for further information.

Choosing the messenger

The EMB should normally lead on voting procedures and official results. Regulators explain their own proceedings and decisions. Newsrooms correct their reporting and retain editorial responsibility. Civil society and fact-checkers can verify and extend reach, especially among communities that do not follow official accounts. Platforms should explain labels, restrictions and routes for review where their policies or legal duties require it.

Prebunking correction and media literacy

Prebunking can explain predictable manipulation techniques and reliable verification routes before false claims spread. It should not label lawful opposition arguments as disinformation or tell voters whom to trust politically. Focus on methods such as impersonation, false deadlines, decontextualised images, fabricated documents and undisclosed sponsorship.

Avoiding amplification

Use the verified fact as the headline. Include only enough of the misleading claim for readers to recognise the issue. Do not reproduce abusive imagery or link directly to harmful material unless necessary. Coordinate timing where several bodies must correct the same operational fact, but preserve independent wording and responsibility.

Inclusive delivery

Plan plain-language, captioned, screen-reader compatible and minority-language versions. Consider radio, regional media, messaging channels, community organisations and telephone support where official social accounts will not reach the affected audience. Monitor whether the correction reached the same communities as the original confusion.

Suggested debrief for Sheet 4

The best response is not necessarily the longest. It states the correct fact first, identifies the source, tells voters what to do and avoids unsupported blame. Ask whether the proposed communication would still work if the main website or social account were unavailable.

Reporting findings and recommendations

SESSION METHOD Report-editing exercise using Sheet 5 | TIME 15, 20 or 30 minutes

Reporting products

Press releases and rapid updates address a specific verified development. Interim reports identify emerging patterns while corrective action is still possible. Preliminary statements provide a time-bound assessment with clear limitations. Final reports analyse the whole period, explain methods and propose reforms.

From data to finding

The supplied Reporting presentation, which reinforces the reporting guidance introduced in Module 4, offers durable practical advice: prioritise what matters, support a trend with one or two well-chosen examples, use relevant comparisons and avoid categorical language unless the evidence supports it. Positive or negative tone alone does not establish bias; assess whether the outlet treats comparable subjects consistently over time.

Minimum finding structure

1. Scope and method: period, media, actors, units and limitations.
2. Evidence: the relevant quantitative pattern and qualitative context.
3. Standard: the legal, ethical or professional benchmark.
4. Assessment: what the evidence supports and with what confidence.
5. Consequence: why the finding matters to voters, contestants or the information environment.
6. Response: action taken, available remedy or institutional gap.

Recommendations that can be implemented

Recommendation test

Question	Weak practice	Stronger practice
Problem	General dissatisfaction	A documented pattern or procedural gap.
Actor	“The authorities”	The institution with the relevant mandate.
Action	“Ensure fairness”	A specific legal, procedural, technical or professional step.
Basis	Assumed best practice	Identified standard, evidence and national context.
Delivery	No timing, resources or review	Realistic sequence, capacity, deadline and review point.
Rights effect	Only enforcement considered	Impact on expression, privacy, equality, participation and remedy.

Drafting formula

Because the monitoring identified [problem and evidence], [responsible actor] should [specific action] through [lawful procedure] to achieve [intended result], while safeguarding [affected right]. Review progress by [milestone].

Moldova monitoring example

The supplied Moldova report describes campaign-period monitoring reports and graduated responses. Discuss publication while correction remains possible and consistency across periods. Verify the law and outcomes before presenting it as precedent.

Trainer debrief for Sheet 5

Reject recommendations that restate a value or assign a task to the wrong institution. Linked recommendations must remain separately accountable.

Practices for media and civil society

SESSION METHOD Practice exchange using Sheet 6 | TIME 5, 10 or 15 minutes

Newsrooms and media organisations

- Adopt election guidelines covering verification, official roles, paid content, polls, corrections, inclusive sourcing, synthetic media and staff safety.
- Explain selection criteria for debates and interviews, distinguish official activity from campaigning and label sponsored material.
- Establish fast correction, right-of-reply and escalation routes without surrendering editorial judgment.
- Prepare account security, backup publication and support for journalists facing threats or abusive litigation.

Civil society fact-checkers and observers

- Publish methods, samples, funding and limitations. Separate verified observation, analytical assessment and legal determination.
- Select media and platforms by relevance and impact, not only by ease of data access. Do not generalise from inaccessible or non-representative data.
- Share urgent voter-information evidence through established routes while preserving independence and source protection.
- Coordinate complementary monitoring and avoid duplicating harmful content or overwhelming institutions with identical alerts.

Shared professional discipline

The supplied monitoring materials repeatedly emphasise quality control: assess media behaviour rather than political contestants, interpret tone and prominence in context, prioritise significant trends, use relevant comparisons and check findings before publication. These habits are part of resilience because credible corrections and recommendations depend on trusted evidence.

Review learning and institutional resilience

SESSION METHOD After-action review using Sheet 7 | TIME 5, 10 or 15 minutes

Review questions

What happened and when? Which assumptions proved wrong? Which essential function continued or failed? What evidence was unavailable? Which response reduced harm? Which response was late, disproportionate or inaccessible? Where did responsibility become unclear? What should be retained, changed, tested or discontinued?

Review the system not only the incident

Examine staffing, training, legal powers, complaint intake, data access, decision speed, correction reach, inter-institutional referrals, platform cooperation, journalist safety and accessibility. Include affected groups and external practitioners in the review while protecting confidential information.

Resilience action register

Lesson	Corrective action	Owner	Resources	Deadline	Test or indicator
A verified gap, not a vague concern	A specific change	One accountable lead	People, budget, authority or tool	Election-cycle milestone	Evidence that the change works

Trainer debrief

Do not let the review become a search for individual blame or a list of ambitions. Select a small number of high-value changes, assign ownership and test them. Preserve practices that worked. Publish an appropriate summary so that learning supports public confidence without exposing protected operational details.

Capstone simulation and action planning

SESSION METHOD Multi-stakeholder tabletop using Sheet 8a or 8b | TIME 10 or 25 minutes

Two delivery options

Use Sheet 8a for a short four-role simulation in the 90- or 120-minute route. It follows an unverified claim that election results may be manipulated as it moves from social media to influencer amplification and traditional-media pickup. Use Sheet 8b for the extended route and a fuller multi-stakeholder response.

Full scenario: Sheet 8b

Seventy-two hours before voting, the EMB website becomes intermittently unavailable. A copied page displays a false polling deadline. A television discussion repeats the claim while criticising the EMB. Creators promote the copied page; sponsorship is unclear. A journalist documenting the network receives threats. Some platform contacts respond, while another requests a formal legal order.

Role tensions

- EMB: restore authoritative information without overreacting to an unverified claim.
- Media regulator: enforce compliance without directing editorial content.
- Campaign-finance or data authority: investigate without prejudging the outcome.
- Newsroom: report quickly without amplifying an unverified claim.
- Platform or digital-services contact: act on a national request without assuming a harmonised legal basis.
- Civil society or fact-checkers: extend reach with limited resources and no enforcement mandate.
- Journalist-safety organisation: protect the journalist without disclosing further identifying detail.
- Judge or lawyer: assess legality quickly without shortcutting due process.

Required outputs

1. A response for the first 60 minutes.
2. A verified public update and accessible distribution plan.
3. An evidence-preservation and referral map.
4. A protection response for the journalist.
5. A seven-day investigation and accountability plan.
6. Three post-election resilience actions with owners and tests.

Suggested debrief

The EMB should restore authoritative voter information through backup channels and correct the deadline. Other actors extend reach within their roles. Preserve the copied page, broadcasts, sponsorship records and threats. Legal and platform routes may proceed in parallel but require separate bases and decisions. The post-election plan should address continuity, contact powers, correction reach, safety and tested coordination rather than claiming that one intervention solved the information problem.

Training of trainers guidance and assessment

Module-specific facilitation

Use Module 9 to turn previous learning into arrangements that institutions can own and test. Common mistakes include creating a coordination group with undefined powers, waiting for certainty before protecting voters or journalists, issuing a correction through channels that missed the affected audience, and drafting recommendations without an accountable actor or review point. Require every proposed action to identify authority, owner, evidence, safeguard and test.

Audience-specific application

Regulators should build escalation and referral protocols. EMBs should practise authoritative correction and continuity. Judges, lawyers and policymakers should test safeguards and reform proposals. Journalists should design newsroom verification, correction and safety procedures. Civil society and observers should convert monitoring into timely findings and follow-up. In mixed simulations, preserve separate decisions while testing coordination.

Assessment and evaluation

Use the preparedness map as the entry diagnostic. Assess the escalation protocol, public correction, finding, recommendation, after-action review and role performance in the capstone simulation. The personal action card and institutional action register provide the exit assessment.

Evidence of learning and trainer reflection

Participants meet the objective when they assign decisions to competent actors, distinguish urgency from evidence level, draft an accessible correction, convert evidence into an implementable recommendation and define a resilience action with owner, resource, deadline and test. End with a confidence rating and one unresolved dependency. Trainers should review timing, participation balance and whether the simulation exposed a real protocol gap.

Audience adaptation

Audience	Emphasis	Best technique	Output
Regulators and supervisory authorities	Thresholds, evidence, coordination, proportionality and review	Protocol clinic and decision audit	Escalation and referral protocol
EMBs	Authoritative voter information, continuity, correction and crisis communication	Tabletop exercise	Accessible correction and backup plan
Judges, lawyers and policymakers	Legal authority, safeguards, remedy and structural gaps	Recommendation and drafting clinic	Implementable reform proposal
Journalists and media practitioners	Editorial protocols, verification, correction and safety	Newsroom simulation	Election coverage and incident checklist

Audience	Emphasis	Best technique	Output
Civil society and observers	Monitoring credibility, rapid reporting, referral and accountability	Report-editing and evidence exercise	Interim finding and follow-up tracker

Mixed groups

Give all groups the same incident but require outputs within their mandates. The plenary should identify duplication, gaps, conflicting messages and the final decision owner. Ask each group to state one dependency on another actor and one safeguard against inappropriate influence.

Facilitation guidance

Keep the module practical. Use national contact maps and real publication channels where safe. Do not measure success by the number of proposed sanctions. Reward verified information, timely protection, clear responsibility, accessibility, lawful authority and learning that can be tested.

Recommended resources

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

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

3. Council of Europe, Recommendation CM/Rec(2024)2 on countering the use of strategic lawsuits against public participation.

4. Venice Commission, Code of Good Practice in Electoral Matters and Interpretative Declaration on the Stability of Electoral Law, CDL-PI(2016)006.

5. OSCE/ODIHR, Handbook on Media Monitoring for Election Observation Missions, 2012.

6. Council of Europe, Media Coverage of Elections, 2017, supplied project resource.

7. ARTICLE 19, Guidelines for Election Broadcasting in Transitional Democracies, supplied project resource.

8. International IDEA, Elections during Emergencies and Crises, supplied project resource.

9. Democracy Reporting International, Guide for Civil Society on Monitoring Social Media during Elections, supplied project resource.

10. UNDP, Media and Elections guide, supplied project resource.

11. NDI, Media Monitoring to Promote Democratic Elections, supplied project resource.

12. Reporting presentation and Golden Rules of Our Monitoring, supplied training resources.

13. Media Monitoring Methodology for the National Council for Radio and TV Broadcasting of Ukraine and related monitoring guidelines, supplied project resources.

14. Moldova media-monitoring report and MEMO 98 election report 2020, supplied practice examples.

Final trainer note

Update institutional names, contact points, platform processes and legal powers before every delivery. Use real cases only after checking primary sources and later developments. Keep participant materials free of the suggested outcomes. End by asking each participant to identify one change that can be owned, resourced and tested before the next electoral period.

Module 9: Good practices response strategies and building resilience

Training material to be shared with participants

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PERSONAL ACTION CARD AND LEARNING CHECK 21

These exercises help you convert electoral communication risks and findings into lawful preparation, timely response, clear public information and practical institutional learning. Work within your assigned mandate and state what remains unknown.

Instructions

- Use the national legal and institutional map supplied by the trainer.
- Separate verified fact, analytical assessment and legal determination.
- Identify who owns each decision and where referral is required.
- Choose a response that is lawful, timely, accessible and proportionate.
- Protect personal data, confidential sources and persons facing threats.
- Do not infer motive, coordination, sponsorship, automation or electoral impact without evidence.

Output for each exercise

State the risk or problem; verified evidence; affected right or function; responsible actor; immediate response; referral; communication; safeguard; limitation; and longer-term improvement.

Sheet 1 Resilience cycle

Starting case

A false polling-place message circulated shortly before voting. The EMB corrected it after three hours, but only on its main website. Broadcasters and community organisations received no direct notice. After the election, no body reviewed how far the message or correction travelled.

Task

Place actions under four headings:

1. Anticipate and reduce risk.
2. Withstand disruption.
3. Respond and recover.
4. Learn and adapt.

Questions

Which action was needed before the campaign? What was urgent during the incident? Which affected groups may not have received the correction? What should be tested before the next election?

Sheet 2 Preparedness map

Scenario

Your country expects a close election, intense online campaigning and possible pressure on journalists. The EMB website has failed during previous traffic peaks. The media regulator cannot supervise campaign finance. Platform contacts exist but response times are unclear.

Protocol fields

For two priority risks define:

- lead institution and legal power;
- operational contact and backup;
- evidence to preserve;
- routine, priority and urgent thresholds;
- referral and response time;
- public messenger and channels;
- accessibility and language needs;
- continuity arrangement;

- review and test date.

Safeguard question

How will the arrangement support cooperation without transferring decision-making power or enabling political interference with media content?

Sheet 3 Response and coordination

Alert

On election morning, an account resembling the EMB posts a false extension of voting hours. A radio host repeats it. The copied account disappears after twenty minutes. Screenshots show different times. A platform contact asks for a formal request.

Task

1. Identify what must happen in the first 15, 30 and 60 minutes.

2. Separate evidence preservation, voter correction, media response, platform action and legal assessment.

3. Name the decision owner for each action.

4. Draft one referral specifying the rule question, evidence, urgency and requested action.

5. Identify the minimum information that can lawfully be shared.

6. Record one action your group must not take.

Sheet 4 Public correction

Drafting exercise

Write a public update of no more than 80 words for the alert in Sheet 3. It must:

- state the verified voting hours first;
- identify the authoritative source and verification time;
- tell voters where to check and obtain assistance;
- state what remains under review without speculation;
- promise only a realistic next update.

Distribution plan

Select the channels, languages and accessible formats needed to reach the affected audience. Include a backup if the EMB website or main social account is unavailable.

Amplification check

Which details of the false message are necessary for recognition? Which should not appear in the headline or visual?

Sheet 5a From data to finding

Monitoring extract

During a fourteen-day sample, Channel X devoted 48 per cent of political and election-related news time to the government, 22 per cent to Party A, 16 per cent to Party B and 14 per cent to other contestants. Government coverage was predominantly positive. Party B received more negative than positive coverage. Two long reports concerned a flood response led by ministers. The methodology does not separate their official and campaign appearances. No comparable data from outside the campaign are available.

Task

Draft a finding containing:

1. scope and method;
2. the most relevant quantitative pattern;
3. qualitative context;
4. applicable standard or question;
5. assessment at the level supported by evidence;
6. limitations;
7. possible follow-up.

Editing rule

Use no more than two examples. Do not state that tone alone proves bias or that the figures establish electoral impact.

Sheet 5b Recommendation clinic

Weak recommendations

A. “The authorities should ensure fair media.”

B. “Platforms must eliminate disinformation.”

C. “Journalists should be more professional.”

D. “The regulator should investigate all online campaigning.”

Rewrite

For each recommendation identify: documented problem; responsible actor; specific feasible action; legal or professional basis; intended result; affected rights and safeguards; resources or sequence; and review milestone.

Drafting formula

Because the monitoring identified [problem and evidence], [actor] should [action], through [lawful instrument or procedure], in order to [result], while safeguarding [right or protection]. Progress should be reviewed by [milestone].

Sheet 6 Professional practices

Newsroom group

Select six elements for an election coverage protocol. Consider verification, candidate selection, official activity, advertising, polls, corrections, inclusive sourcing, synthetic media, account security, journalist safety and legal support.

Civil society and observer group

Select six elements for a credible monitoring and rapid-reporting protocol. Consider scope, sampling, quality control, data access, evidence preservation, public language, urgent referrals, source protection, funding disclosure and limitations.

Exchange

Each group identifies one form of cooperation it needs from the other and one safeguard that protects independence.

Sheet 7 After-action review

Case record

An urgent correction reached most national television audiences but not two linguistic minorities. Platform data arrived after election day. The regulator issued a well-reasoned decision, but the referral took five days. A journalist-safety organisation prevented further disclosure of personal information. Staff used private messaging accounts because the official system failed.

Review table

For each point identify:

- what worked or failed;
- evidence and affected group;
- root cause within the system;
- corrective action;
- owner and required resource;
- deadline;
- test or indicator;
- information that may be published.

Priority choice

Choose the three changes that would reduce the greatest risk before the next election. Explain why the remaining actions can wait.

Sheet 8a Short capstone simulation

Scenario

On election morning, an unverified social-media post claims that election results may be manipulated. An influencer repeats the claim to a large audience and adds that "official silence proves it." A television presenter then cites the online discussion and asks whether the count can still be trusted. No verified evidence of manipulation has been produced.

Roles and core tensions

- Media: report quickly without amplifying an unverified claim.
- EMB: protect confidence through authoritative information without dismissing legitimate scrutiny.
- Media regulator: assess compliance without directing editorial content.
- Civil society and fact-checkers: verify and extend reliable information with limited resources and no enforcement mandate.

Three rounds

1. Social-media claim: decide what to verify, preserve and communicate in the first 15 minutes.

2. Influencer amplification: decide who contacts whom and what can responsibly be said within 30 minutes.

3. Traditional-media pickup: prepare a joint timeline for the first hour while keeping each actor's decision-making independent.

Output

State verified facts, unknowns, immediate actions, decision owners, one referral, one public message and one safeguard against overreaction.

Sheet 8b Full capstone simulation

Round 1

Seventy-two hours before voting, the EMB website becomes intermittently unavailable. A copied page displays a false polling deadline. A television discussion repeats the claim while criticising the EMB.

Roles and core tensions

- EMB: restore authoritative information without overreacting to an unverified claim.
- Media regulator: enforce compliance without directing editorial content.
- Campaign-finance or data authority: investigate without prejudging the outcome.
- Newsroom: report quickly without amplifying an unverified claim.
- Platform or digital-services contact: act on a national request without assuming a harmonised legal basis.
- Civil society or fact-checkers: extend reach with limited resources and no enforcement mandate.
- Journalist-safety organisation: protect the journalist without disclosing further identifying detail.
- Judge or lawyer: assess legality quickly without shortcutting due process.

First response

Prepare the first 60 minutes: verified facts; essential function; immediate action; public messenger; preservation; referral; safeguard; and next review time.

Sheet 8b Rounds 2 and 3

Round 2

Creators promote the copied page. Sponsorship is unclear. A journalist documenting the network receives threats. One platform responds, while another requests a formal legal order.

Round 3

The website returns. The EMB publishes a correction only in the majority language. The broadcaster corrects the statement but does not explain why it was aired. A platform removes some posts without reasons. Evidence suggests the copied page used infrastructure previously linked to commercial fraud, but no actor is identified.

Joint outputs

1. A verified and accessible public update.
2. An evidence-preservation and referral map.
3. A protection response for the journalist.
4. A seven-day investigation and accountability plan.
5. Three post-election resilience actions with owners and tests.

Final check

Which claims remain unsupported? Which institution owns each decision? Where could the response itself restrict rights or deepen distrust?

Personal action card and learning check

One practical commitment

Before the next electoral period, my institution or professional group should:

.....

The responsible owner should be:

.....

The change can be tested by:

.....

Six-question check

1. How is resilience different from eliminating harmful content?
2. What should a preparedness protocol settle before the campaign?
3. Why does cooperation not merge institutional mandates?
4. What makes a correction effective as well as accurate?
5. What are the five essential parts of an implementable recommendation?
6. Which lesson from an incident belongs in an after-action register?

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