

Discussion paper

Towards Standards for Integrity in Political Finance

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This discussion paper advances a comprehensive framework for strengthening integrity in political finance, responding to persistent global challenges of opacity, illicit funding, unequal competition and weak enforcements. Drawing on extensive consultation and Transparency International's Standards for Integrity in Political Finance, it proposes six interdependent principles – transparency, clean money, a level playing field, gender equality, state neutrality, and accountability – to address systemic vulnerabilities across political finance regimes. The paper documents widespread gaps in disclosure, ineffective oversight, misuse of state resources, and structural barriers faced by women and underrepresented groups. It outlines detailed policy options aimed at enhancing reporting, regulating donations and expenditures, curbing foreign and illicit influence, safeguarding gender inclusion, and empowering independent oversight bodies to ensure compliance and deter corruption.

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Why standards for integrity in political finance?

In order to compete in elections, political parties and candidates require resources to organise themselves, to formulate and communicate their ideas, enabling political participation and representation.¹ However, when money flows unchecked, risks follow. Global research consistently shows that campaign finance remains the weakest area of election integrity.² Integrity in political finance can strengthen democracy and help to prevent conflicts of interest, corruption in public office, and state capture.³ Unfortunately, existing standards for political finance are too few, unsystematic and only weakly translated into international obligations. Article 7.3 of the United Nations Convention against Corruption (UNCAC) commits its 191 state parties to transparency in political finance. However, persistently low levels of transparency around the world reflect an absence of implementation.⁴

Why political finance?

Money is bound to affect integrity when it flows in a manner that is opaque, unconstrained, imbalanced, prone to abuse by incumbents, and unaccountable. Hence, in using the term political finance, this discussion paper refers to how political parties, candidates and other third parties or non-contestants raise and spend money for their regular activities and election campaigns, and how that financing is regulated and overseen.⁵

Why Transparency International standards?

Transparency International works to protect the integrity of politics by rooting out corruption from the top. We understand political integrity as rulemaking that is consistently aligned with the common good, and we advocate through intergovernmental mechanisms⁶ whose remit includes – or could include – setting higher standards of integrity for political finance. Transparency International chapters advocate with their parliaments, election management bodies and oversight agencies for improvements to their countries' political finance rules. Many of them carry out their advocacy in addition to observing elections – for example, through monitoring for misuse of public resources and campaign donations and expenditures. Two sets of policy recommendations informed our national and international advocacy until 2024: [Standards on Political Funding and Favours](#) and [Political Finance Regulations: Bridging the Enforcement Gap](#). However, these standards are now 15 years old, and new challenges have arisen in the meantime, along with new forms of financial abuse in politics.

To address this gap, this discussion paper presents a set of policy options for updated standards for integrity in political finance, under six principles: transparency, clean money, a level playing field, gender equality, state neutrality, and accountability.

Existing international commitments and obligations

The only international treaty with global reach that includes political finance is the United Nations Convention against Corruption (UNCAC). Article 7.3 of the Convention calls on States “to enhance transparency in the funding of candidatures for elected public office and, where applicable, the funding of political parties”. Regional instruments set commitments and obligations to varying extents. Aspects of political finance, such as transparency and illicit funding, are recognised to an extent by the African

Union's Convention on Preventing and Combating Corruption;⁷ the Organisation of American States' Inter-American Democratic Charter;⁸ the Commonwealth of Independent States' Convention on the Standards of Democratic Elections, Electoral Rights and Freedoms;⁹ and other mechanisms, such as the Summit for Democracy or Summit of the Americas.¹⁰ Europe has a suite of soft-law standards that covers a wide range of aspects related to integrity of political finance.¹¹

Implementation of these international commitments and obligations also varies greatly – evident, for example, in access to financing by women politicians. While the Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW) recommends the use of financial measures to overcome this barrier – as do General Recommendations of the Committee on the Elimination of Discrimination against Women 23 and 25 – only 31 countries out of around the world have adopted a form of gender-targeted public political financing to that effect.¹²

A global consultation

Against this backdrop, Transparency International conducted a year-long global consultation to inform the *Standards for Integrity in Political Finance*. The consultation included Chapters from across our movement, and experts from leading international organisations in the field of elections, democracy and anti-corruption. In March and April 2024, we convened regional consultations to elicit views from national Chapters and other stakeholders on the most pressing challenges to integrity in political finance, in particular with regard to transparency and gender equality. In March 2024, consultations with Chapters from the Americas and Africa took place in Bogotá and Lusaka, respectively. Regional consultations with Asia and the Pacific, Europe, and the Middle East and Northern Africa took place online during April 2024. The Transparency International Secretariat consolidated a wide range of the most pressing issues raised through those consultations into a first version of this discussion paper, then gathered further feedback at an expert roundtable discussion held in Vilnius, Lithuania, in June 2024. This resulted in a second version of the discussion paper, which was open for inputs until 30 August 2024, to elicit additional views from within and outside the movement. This version reflects all feedback received, checked for accuracy to the best of our ability.

SIX PRINCIPLES FOR INTEGRITY IN POLITICAL FINANCE

1. Transparency

Transparency of money in politics helps citizens make informed decisions and deter undue influence of vested interests on elected representatives. Research by Transparency International suggests that countries which have comprehensive requirements for disclosing political finance, and which enforce them, present fewer opportunities for corruption. These countries score on average just over 50 per cent higher on Transparency International's *Corruption Perceptions Index* compared to those with inadequate enforcement of such requirements, or twice as high those with no disclosure requirements at all.¹³ Shedding light on who donates to parties, campaigns and candidates, and how much, can expose the influence of money in politics, and deter corruption. Knowing the volumes and objectives of political spending helps stakeholders understand the extent to which both policies and elections are contested on a level playing field.

Relevant international commitments, obligations and standards

Transparency in political finance is arguably the principle most covered by existing global and regional commitments and standards.

- UNCAC, Article 7.3 calls for legislative and administrative measures to enhance transparency in political financing.
- The AU Convention on Preventing and Combating Corruption, Article 10, on the Funding of Political Parties, commits each state party to adopt legislative and other measures to “(b) Incorporate the principle of transparency into funding of political parties”.
- The Organization of American States (OAS) Democratic Charter, Article 5, declares that the “strengthening of political parties and other political organizations is a priority for democracy. Special attention will be paid to the problems associated with the high cost of election campaigns and the establishment of a balanced and transparent system for their financing,” and the Lima Commitment on Democratic Governance Against Corruption (2018) encourages the “strengthening of measures that promote transparency, accountability...”
- The Commonwealth of Independent States (CIS) Convention, Article 12.5, requires candidates and parties to regularly report donations and expenditures, and public access to this information.
- The Council of Europe (CoE) Recommendation Rec (2003)4 of the Committee of Ministers to member states on common rules against corruption in the funding of political parties and electoral campaigns, Article 3, requires adhering states to provide specific rules to “ensure transparency of donations and avoid secret donations” and “provide that donations to political parties are made public, in particular, donations exceeding a fixed ceiling”. Articles

12 and 13 require detailed accounting of donations, with donor identification for significant amounts, coupled with regular, at least annual, public reporting by political parties.

- The Organization for Security and Cooperation in Europe's Office for Democratic Institutions and Human Rights (OSCE/ODIHR) and Venice Commission's Guidelines on Political Party Regulation recommend introducing “requirements that increase the transparency of party funding and credibility of financial reporting” (paragraph 205); and recognise that “Transparency in party and campaign finance (...) is important to protect the rights of voters, prevent corruption and keep the wider public informed” (paragraph 247), and stipulate that political parties should be required to submit annual disclosure reports while balancing donor privacy in cases of potential threats or harassment (paragraph 265).

Key issues related to transparency

Absent or weakly enforced public disclosure

57 out of 181 countries assessed by International IDEA do not mandate political parties to report on their election campaign finances, and 46 do not mandate candidates to do so.¹⁴ Even when financial information is reported to a relevant authority, in many cases it is not made available to the public, or only made available in formats not easily accessible or reusable. A survey of 117 countries in Africa, Asia Pacific and Latin America and the Caribbean, found that in only 29 of them published political finance information online.¹⁵

A self-assessment survey of Public Integrity Indicators in 54 countries conducted by the Organisation for Economic Co-operation and Development's (OECD), finds that 60 per cent of them make all financial reports available through a single online platform in a user-friendly format.¹⁶ The Implementation Review Mechanism of the UNCAC has found that “lack of comprehensive legislation or administrative measures to regulate the funding of candidates for elected office and the funding of political parties, including in relation to transparency (...) and effective disclosure obligations” are one of the most prevalent challenges in implementation of Article 7.3 of UNCAC in 104 countries under review.¹⁷

Untimely reporting and public disclosure

A lack of timeliness in reporting financial information and its public disclosure prevents voters from making informed choices at the ballot box. This problem can arise when political parties are only required to report annually, without campaign-specific reporting obligations for them or their candidates. For instance, reporting periods in Denmark, Germany and Sweden are set on an annual basis, with reporting deadlines due late in the following year. Campaign-related reports are not only submitted too late (except for large donations in Germany), but also fail to distinguish between campaign and non-campaign information.¹⁸ Delays in publication are also a problem. Only around 40 per cent of countries surveyed in the 2021 *Global Data Barometer* published political finance information in a timely manner.¹⁹ In Morocco, for example, the financial expenses of political parties from the September 2021 parliamentary elections were not disclosed until 2024, and then only through a summary audit report in non-machine-readable format.²⁰

Undisclosed donors

Table 1

Percentage of countries with online data for:	No	Partially	Yes
First and last name of each donor	58%	9%	33%
Unique identifiers for each donor	82%	4%	14%
Timing and amounts of donations per donor	56%	11%	33%

Source: *Global Data Barometer 2021*. Based on an analysis of 109 countries

Arguably the most important information contained in political finance reports is donors' identification and the amounts they have contributed. Only with this information can oversight agencies, the media and civil society hold political parties and candidates accountable for any attempts at undue influence or state capture. However, 58 per cent of 109 countries surveyed in the 2021 *Global Data Barometer* did not require political parties or candidates to report their donors' identities. An estimation of the identification of campaign donors in 157 countries, reveals that only 7 out of 33 in Asia-Pacific, 13 out of 33 in Latin America and the Caribbean, 1 out of 51 in Africa, and 28 out of 40 in Europe publish such information online.²¹

The gold standard of transparency is the use of unique identifiers²² that facilitate scrutiny by anti-corruption watchdogs. Their use was reported in just 18 per cent of the 109 countries surveyed by the Global Data Barometer in 2021.²³

While most EU countries mandated donor transparency at the time of the 2024 European elections, reasons ranging from reporting methods and publication mandates to questionable concerns over privacy or disregard for compliance prevented full transparency. A media investigation found that donors' were known to the public for only three out of every 10 euros that political parties received from individuals and companies between 2019 and 2022. This means that more than €660 million were unaccounted for during that period.²⁴

However, it should be acknowledged that there may be legitimate concerns over the disclosure of donor identities in certain circumstances. For example, financial supporters of opposition parties in autocracies may not want to publicise their donations, fearing reprisal. Similarly, in countries where organised crime groups have a vested interest in election outcomes, public information about donations could put donors at physical risk. Public disclosure of donor identities should therefore be tailored to the political and security context of each country, and should balance the need for transparency with the need for protections.

Insufficient information reported and published

Table 2

Percentage of countries with online data for:	No	Partially	Yes
Assets and liabilities of each party or candidate	65%	13%	22%
Donations, public funding and membership dues for each party or candidate	51%	20%	29%
In-kind and non-financial support donated to each party or candidate	66%	11%	23%
Income for each party or candidate	55%	11%	34%

Spending of each party or candidate	53%	10%	37%
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Source: *Global Data Barometer 2021*.²⁵ Based on an analysis of 109 countries

In addition to lacking information on donors, the majority of published political finance reports assessed in 109 countries fall short of including other key information. Sixty-six per cent do not cover in-kind or non-monetary donations, while 53 per cent have no data on expenditure and 51 per cent do not publish information on public funding or membership dues (table 2).

In about a quarter of the 181 countries included in the International IDEA database, financial reports submitted by parties or candidates do not need to provide information on itemised expenditure.²⁶ Weak reporting and publication rules allow for circumvention. For instance, in Sweden, it was revealed that some political parties tried to circumvent donation rules to conceal true amounts from the public.²⁷ A parliamentary commission of inquiry was established to investigate current practices and recommend revisions to the legislation.

The lack of information, which extends to other areas such as tax, beneficial ownership, among others, also hinders the ability to cross-check to verify the accuracy of information that is required to pursue effective and timely investigations of offences related to political finance.

As emphasised by the EU guidelines for election observers' reporting on political finance, "timely and accessible publication of political finance information is crucial for enhancing transparency. Online publication through websites with user-friendly, accessible formats that allow users to search by donors and expenditures in timely fashion ensures transparency of political finance".²⁸

Policy options: transparency

Standards to promote transparency

1.1 Bookkeeping obligations

- a) The legal framework must require political parties, candidates and campaigns to keep detailed financial records in line with international accounting standards. This should include records of all income and expenditure, together with the identity of funding sources and vendors, as well as assets and liabilities. Records and supporting documentation must remain available for scrutiny for extended periods of time.
- b) The legal framework should require political parties, candidates and campaigns to manage all income and expenditure through dedicated bank accounts that are open to public scrutiny, so transactions can be traced.

1.2 Reporting obligations

- a) The legal framework must establish an obligation for political parties, candidates and campaigns to report their income to the appropriate independent, impartial oversight body. This must include both in-kind and monetary income, as well as assets and loans. Reporting must include the value, date and source of each incoming transaction above a reasonable threshold.
- b) The legal framework must establish an obligation for political parties, candidates and campaigns to report on their expenditure, including the value, date and identity of vendors, presented in appropriate itemised categories. Reports must allow for accurate classification

of different services and purposes, and include expenditures incurred using earmarked public funding, where applicable. Oversight agencies must review itemisation categories regularly.

- c) The legal framework must require submission of political finance reports in regular and reasonable timeframes to allow for effective verification, auditing and accountability to voters. Reporting deadlines must be at least annual for regular political party financial reports.
- d) The legal framework must set reporting deadlines for election campaign periods for political parties, candidates and campaigns. These must provide for prompt disclosure of donation amounts and donor identities for donations above a reasonable threshold, or the submission of interim reports disclosing this information, as well as itemised expenditure, before the election day.
- e) The oversight body must provide political parties, candidates and election campaigns with standardised reporting formats, and digital solutions and systems to facilitate bookkeeping and financial reporting in as close to real time as possible – as well as the technical assistance to facilitate their use.

1.3 Publication of political finance information

- a) The independent oversight body that receives political finance reports must publish them all in as close to real time as possible, through a centralised, user-friendly platform that provides searchable, accessible information in open data formats, so the electorate can take such information into account when voting. The information published must include all data points listed in 1.2.a-b.
- b) The legal framework must enable real-time or prompt disclosure of political finance information by making the dedicated bank accounts of political parties, candidates and campaigns referred to in 1.1.b) publicly available. It must also mandate oversight agencies to develop digital solutions that allow bookkeeping and reporting on an ongoing basis, as well as their automatic public disclosure.
- c) Where the full identification of individual small donors is not possible or desirable due to exceptionally pressing privacy concerns, or a reasonable probability of threats, of threats, harassment or reprisals, the legal framework should set a reasonable limit on the aggregate allowable amount of income whose source is not publicly identified, for a political party, candidate or campaign.

Further recommendations to meet future challenges

Bookkeeping obligations: Political finance oversight agencies should provide support and technical assistance to facilitate compliance, including guidance for invoicing and bookkeeping.

Reporting obligations: To enable transparency and accountability, good practice calls for realtime reporting of donations above a reasonable “small-donor” threshold, along with other relevant income (for instance loans or sponsorship) during campaign periods. Ensuring that such income is received through a dedicated bank account can help facilitate both automatic reporting and prompt disclosure to the public. Any exemptions to reporting requirements must be based on clear criteria, such as the risk of threats, harassment or reprisals against individual donors; the wish to incentivise grassroot fundraising by reducing the administrative burden of reporting hundreds or thousands of small donations, or the need to balance the right to privacy for those making such small donations.

However, such exemptions to incentivises small donations must include a limit to the aggregate allowable amount of income whose source need not be reported or identified.

Publication of financial reports: Oversight agencies can lead by example by publishing financial information in searchable and accessible open data formats, through application programming interfaces (APIs) with historical data and bulk download availability, free of charge. Reflecting good practice, oversight agencies could provide data visualisation platforms that enable users to scrutinise data interactively. The legal framework should also provide for the interoperability of political finance information with public contracting data, company registries, beneficial ownership registers, interest and asset declarations, lobbying registers, and other registers as relevant. Legislation should also require all such databases to be made publicly available in a timely and accessible manner, to allow media, citizens and civil society groups to cross-check data.

Realtime public disclosure: To enhance accountability, political parties, candidates, campaigns and oversight agencies should strive for real time disclosure of income and expenditure transactions above a reasonable threshold, during or outside electoral campaign periods – for instance, through the use of dedicated, transparent bank accounts which are publicly accessible, free of charge, as in Czechia and Slovakia.

2. Clean Money

Money in political finance must come from legitimate sources and be channelled through legal means to safeguard the democratic process from corruption, undue influence and state capture. Ensuring that political funding originates from appropriate sources and is acquired through legitimate means closes opportunities for criminal actors to gain and leverage political influence to sustain their profitable activities with impunity. These actors may seek to circumvent bans or exploit loopholes in political finance rules. Money thus illicitly and covertly funnelled into the political process can also be used to subvert public deliberation through misinformation and disinformation campaigns.

Donations to political parties or candidates should not be a means to get an undue advantage in public decision making. Practices to ensure clean money are fundamental to maintaining public trust in the electoral system, ensuring that political outcomes are determined by the will of the people, and not distorted by undue, illicit pressures, domestic or foreign.

Relevant international commitments, obligations and standards

- UN General Assembly Resolution 46/130 §6 strongly appeals to all states to refrain from financing or providing, directly or indirectly, any other form of overt or covert support for political parties or groups and from taking actions to undermine the electoral process in any country.²⁹
- The AU Convention on Preventing and Combatting Corruption, Article 10(a) on Funding of Political Parties requires states to “Proscribe the use of funds acquired through illegal and corrupt practices to finance political parties”.

- The CoE Recommendation on common rules against corruption in the funding of political parties and electoral campaigns recommends in Articles 5b, 5c and 7 “limiting, prohibiting or otherwise strictly regulating donations” from government contractors, state-controlled legal entities, and foreign donors.
- The OSCE-ODHIR and Venice Commission Guidelines on Political Party Regulation recommend strict regulations on anonymous donations (paragraph 212); limits on “the ability of particular categories of persons or groups to gain political influence and influence the decision-making process through financial advantages” (paragraph 211); “having in place provisions requiring all financial transactions to go through a single bank account” (paragraph 247); and regulation of third parties to avoid circumvention of political finance rules (in paragraphs 255 and 256).
- The EU Regulation on the Transparency and Targeting of Political Advertising defines a framework for ensuring online political advertising is paid for by legitimate actors ³⁰
- The OAS Lima Commitment, Democratic Governance Against Corruption (2018), Commitment 25, requires: “Encouraging adoption and/or strengthening of measures that promote transparency, accountability, appropriate accounting, and use of the banking system for income and expenditures of political organizations and parties, especially those related to their electoral campaigns, in order to guarantee the licit origin of the contributions and penalizing anyone involved in accepting illicit contributions.”

Key issues related to clean money

Abuse of cash and in-kind donations

Eighty-two of 181 countries do not require political parties, candidates or third parties to handle donations through banking systems.³¹ Cash transactions are ripe for abuse due to their opaque, untraceable nature. Similarly, in kind-donations are not regulated in more than half the world’s countries.³² Cash donations and unregulated in-kind contributions are highly risky for corruption, as they are easier to conceal. In North Macedonia, the Special Prosecution Office launched an investigation into the former prime minister and ruling party for accepting €4.9 million in donations. According to the office, there was reasonable suspicion that the money originated from a crime committed by a group of people who enabled money laundering through the party’s local organisations by depositing cash in the party account in the form of personal payments. The allegations also point to negligence on the part of banks, which did not raise any suspicious transaction reports stemming from the unusual deposits.³³

Use of political finance for money laundering

Organised criminal groups and corrupt officials have long used political campaigns and political party finance to launder their ill-gotten gains. In Indonesia, the Financial Transaction Reports and Analysis Center launched a report revealing the use of illicit funds in general elections, with suspicious transactions – presumably stemming from drug trafficking, and illegal mining and logging – amounting to billions of US dollars.³⁴ This enables criminals not only to launder the proceeds of their crimes, but also to buy influence with future decision-makers, presenting a risk of state

capture. In Zambia, Financial Intelligence Centre reports indicate that in campaign years, there are rises in the number of Suspicious Transaction Reports received from entities such as banks, casinos, accounting firms, among others.³⁵ A recent case from Bosnia and Herzegovina revealed that companies involved in money laundering for a drug cartel were donors to one of the ruling political parties, resulting in some public officials being arrested.³⁶

Anonymous donations

Sixty-four out 181 countries do not ban or restrict anonymous donations to candidates; most do not require corporate donors to disclose their beneficial ownership, nor do they link donations to physical persons. In Denmark, for example, experts from both the Council of Europe's Group of States against Corruption and ODIHR attested that although the country introduced a ban on anonymous donations to parties and lists of candidates, anonymous donations to individual candidates remained permitted, and authorities had no plans to change this, as of 2022.³⁷ Anonymous donations can also be used as a vehicle for illicit foreign funding (see below).

Foreign donations

Bans on foreign-sponsored political finance are common across the world, with over 70 per cent of countries including such bans on political parties in their legislation, and 50 per cent imposing them on candidates.³⁸ However, foreign interests find ways to cloak their financial support to political parties, candidates, campaigns and other politically influential groups through non-transparent or corruptive structures, often to subvert the democratic process or achieve a foreign policy objective. Among the loopholes exploited are in-kind financial support, such as loans or expensive gifts, tailor-made social media manipulation, or advisory services;³⁹ straw donors; foreign-controlled corporate vehicles and other third-party organisations. A 2020 study by the German Marshall Fund identified over 115 covert foreign political financing operations in 33 countries, involving an estimated US\$300 million between 2010 and 2020.⁴⁰ Such loopholes are also commonly used in countries where foreign donations are not banned, as parties do not want to be open about receiving money from foreign sources.

Corporate donations that could lead to undue influence

Corporate disclosure of political donations, often overseen by boards or shareholders, has gained currency as a tool to foster a positive role for business in politics, and encourage alignment between policy goals and political giving.⁴¹ Since 2009, the share of S&P 500 US company boards with oversight of political donations has more than doubled to over 60 per cent in 2023.⁴² However, this shift is largely voluntary, as few countries legally mandate it. A survey by the Organisation for Economic Co-operation and Development (OECD) and the Principles for Responsible Investment of 17 OECD countries found legal requirements only in the UK (for shareholders) and India (for boards).⁴³ In certain contexts, similar measures could also be considered with regard to member or stakeholder oversight of union donations.

Risks associated with corporate political donations call for legal safeguards. Political favouritism or quid pro quo risks have led an increasing number of countries to ban donations made by companies bidding for or carrying out government contracts – two thirds of them within the OECD.⁴⁴

Vote buying

Opaque money from illicit sources in political campaigns often also leads to illicit and illegal types of expenditure, such as providing financial or material inducements to citizens, or vote buying. The infiltration of organised crime and the abuse of state power can also be used to intimidate and coerce voters to cast their ballots a certain way. Although vote buying is very difficult to prove, Transparency International's *Global Corruption Barometer* found that nearly one in seven people across Asia declared to have been offered bribes in exchange for votes.⁴⁵ In Mexico and Brazil, the rates are 50 per cent and 40 per cent, respectively.⁴⁶ A third of voters in Bulgaria, Indonesia, Kenya and the Philippines have admitted to being offered cash, food or other goods in exchange for their vote during an election campaign, as have a quarter of voters in the Dominican Republic and Sierra Leone, and a fifth of voters in Argentina – although the actual incidence of vote buying is likely to be far higher.⁴⁷ In some contexts, such as Colombia, mass vote buying is also practised, whereby community leaders are bought instead of individual voters. Those leaders commit to mobilise a specific number of voters in exchange for the money.⁴⁸

Risks associated to opacity in online campaigning

With the shift of audiences away from traditional media and towards digital media, online campaigning has become an important area of political contestation. However, online campaigns present new risks which are often not captured by existing political financing regulations. In many countries, digital political adverts can still hide their sponsors and costs, enabling anyone with a credit card to bypass restrictions on spending caps or in-kind regulations. Monitoring online political advertising is difficult due to the complex and decentralised nature of social media, AI use and high volumes of adverts, which, along with the lack of regulation, can lead to untraceable funds influencing elections. Additionally, microtargeting allows candidates and third parties to direct adverts towards specific groups of voters, excluding others and potentially spreading misinformation. Microtargeting also makes it more difficult for oversight bodies and watchdogs to monitor social media activity conducted on behalf of a candidate or campaign. Both domestic and foreign actors exploit these loopholes.⁴⁹

Use of anonymised payment cards and cryptocurrencies

While digital technologies such as blockchain offer new opportunities for increasing fundraising to political parties and candidates, they also present challenges. Illicit and illegal funds may be channelled using anonymised payment cards and cryptocurrencies, some of which make it almost impossible to identify the source and destination of transactions, circumventing political finance regulations, such as donation limits and bans on anonymous donations.⁵⁰ While individual cryptocurrency owners typically have some type of identifying user number, that number is not necessarily attached to a real-world identity.⁵¹ The volatility of cryptocurrencies also makes it hard to determine the value of one unit, posing a challenge for enforcing limits on political finance spending.⁵²

EU guidance for election observers underlines that they should examine whether the use of cryptocurrencies is regulated outside and during electoral campaigns, and whether transactions in cryptocurrencies are banned.⁵³

Unregulated third-party campaigning

Third-party or non-contestant election spending that is unregulated and unchecked, may open the door to illicit political financing when the funds are used by actors that derive their funds from impermissible sources, including foreign sources; when the size of their spending exceeds donation or expenditure limits.⁵⁴ Third parties can be political movements, political committees that can receive unlimited donations to make expenditures in support of candidatures – or “super PACS” in the United States that are used to create- parallel campaign funds to evade regulation.⁵⁵ Other methods include the use of clubs, companies and councils as donors to avoid disclosure; the use of linked anonymous organisations to circumvent spending limits,⁵⁶ earmarking third-party spending as “educational” or “membership building”, rather than as political spending, to avoid disclosure requirements,⁵⁷ or establishing or subverting think tanks and non-governmental organisations and associated funding.⁵⁸ Despite these risks, only 55 out of 139 countries for which data is available have adopted third-party regulations in the form of bans or limits,⁵⁹ while at least 101 countries do not regulate third-party financing at all.⁶⁰ All seven countries analysed in a recent regional study of the Western Balkans and Türkiye failed to require third parties to report on their campaign activities and spendings.⁶¹ For example, during the 2021 Kosovo local elections, the EU Electoral Observation Mission concluded that a third of the campaign’s online advertising was conducted or sponsored by third parties.⁶²

Policy options: clean money

Standards to promote clean money

2.1 Due diligence and “know-your-donor” good practices

- a) The legal framework must require financial institutions to regularly monitor the bank accounts designated to manage political finance, and report any suspicious transactions to the authorities. Such suspicious transaction reports should be triggered by activity including, but not limited to, donations above the legal limits, or multiple donations from the same donor which cumulatively exceed legal limits.
- b) Political parties, candidates and their campaigns must check that the sources of donations are permitted to make political finance contributions. In compliance with their own internal policies, recipients should also assess the reputational and conflict-of-interest risks created by accepting substantial donations and loans from eligible sources.
- c) The legal framework should define a reasonable period during which political parties, candidates and campaigns can carry out appropriate checks before accepting, refusing or returning a donation.

2.2 Criminalisation of illicit political financing and vote buying

- a) The legal framework must establish criminal liability for individuals knowingly engaged in conferring, soliciting or accepting substantial political funding that originates in criminal activity.
- b) The legal framework must also establish criminal liability for individuals that offer money, goods, services and other benefits to voters, either to induce them to exercise their electoral rights or refrain from exercising such rights.

2.3 Reporting obligations for third parties influencing electoral outcomes

- a) The legal framework should extend reporting requirements to third-party or non-contestant groups which aim to influence electoral outcomes, if their expenditure exceeds a reasonable set limit. Reporting requirements must safeguard the freedoms of citizen groups pursuing broader political and social advocacy goals without seeking to influence electoral outcomes.

2.4 Closing loopholes on anonymous donations

- a) The legal framework must ban political parties, candidates, campaigns and third parties from accepting donations from anonymous sources, as well as donations in cryptocurrency and other crypto assets without a public or open ledger, or that are unsupported by a central bank.

2.5 Online political advertising

- a) The legal framework must update definitions of political advertising to include paid online communications aimed at influencing regulatory and election outcomes. The framework must require platforms or publishers of advertisements to create machine-readable registers of all adverts, and maintain these for extended time periods, detailing their sponsor, payer, authoriser, impressions, reach, duration period and targeting criteria. These registers must also contain the aggregated value or costs of the publishing services incurred by the political parties, candidates, campaigns, intermediaries or individuals who placed the adverts.
- b) The legal framework must require online platforms to implement safeguards against the abuse of paid digital communications by third parties to circumvent political finance rules. Safeguards include advert labelling, the disclosure requirements listed in 2.5.a, identity verification, geolocation-based rules to enforce country-specific regulations, and mechanisms for reporting suspicious or non-compliant adverts.
- c) The legal framework must require detailed and itemised reporting of expenditures incurred by political parties, candidates, their campaigns and other third parties legally authorised to prepare and place online adverts, whether directly or through intermediaries or advertising companies.

2.6 Corporate political donations

- a) The legal framework must require that corporate policies on monetary and in-kind contributions to political parties, candidates and third parties are subject to review and approval by the company's governing body, and that decisions on donations are reserved for relevant senior management and subject to board or shareholder oversight.
- b) The legal framework must require companies that make political finance donations to declare their beneficial owners to the recipient political party, candidate or campaign. The recipient should return any donations from legal entities that fail to provide such a declaration or do not publicly disclose their beneficial ownership information.
- c) The legal framework must ban, limit or otherwise restrict donations from companies or legal entities to officials targeted by their lobbying, or from companies that provide services to public administrations, participate in public procurement tenders, or receive state subsidies, permits and concessions.
- d) To enable broad public understanding of what private companies seek to achieve with their political engagement, the legal framework must require the proactive disclosure of companies' political finance contributions, along with the main policy issues or regulatory acts concerned by their activities; their public policy positions and outcomes sought on these

matters; and the materiality assessments of their activities, in line with internationally recognised frameworks.

2.7 Foreign donations

- a) The legal framework should ban campaign donations to political parties and candidates from foreign interests such as governments, citizens and commercial legal entities. Support from international associations or democratic assistance organisations to political parties should be allowed during non-election periods for the purposes of developing institutional capacities and the political and civic education of members and citizens.
- b) The legal framework must define thresholds and criteria for foreign ownership or control by which legal entities will be deemed as foreign and therefore prohibited from making donations.

Further recommendations to meet future challenges

Due diligence practices: To strengthen due diligence practices, the legal framework must require political parties, candidates and campaigns to receive donations and make disbursements only through dedicated bank accounts. Reflecting good practice, the legal framework should explicitly place responsibility for conducting checks and reporting on suspicious political financing transactions with financial institutions, where appropriate.

Accepting donations: Reflecting good practice, the legal framework should ban political parties, candidates and third-party organisations from accepting donations from legal persons whose beneficial owners are not disclosed.

Codes of ethics and compliance programmes: Political parties should develop codes of ethics and compliance programmes to guarantee robust standards of political financial integrity. These programmes should carry out a risk analysis, including financial integrity risks; appoint compliance officers, and establish safe and effective whistleblowing systems.

Breaches of political finance rules: The legal framework must ensure proportionate sanctions for the concealment of substantial income or expenditure by political parties and candidates as well as to establish criminal liability for donations made with the purpose of extorting undue advantages from elected officials, political party officials, candidates or intermediaries acting on their behalf.

Closing loopholes on anonymous donations: Beyond the basic recommendations outlined above in standard 2.4, the legal framework must ensure that the definition of “in-kind” contributions or donations includes intangible, uncertain or perceived benefits that can be hard to value – such as advertising, research into the opposition, or datasets. These must be subject to the same eligibility, limits, reporting and disclosure conditions as monetary contributions. Governments should also ensure that only cryptocurrencies that allow for immutable and open transaction records and are subject to anti-money laundering controls, according to accepted international standards, are permitted as political finance contributions.

Online advertising: To confront new challenges presented by online advertising, the legal framework must require digital platforms selling advertising to meet high transparency standards,

by distinguishing paid content from user-generated content, and by adequately labelling political adverts. It must also mandate an appropriate body with the oversight of online advertising, fundraising and campaign regulations. Political parties, candidates and third parties should be required to pay for authentic online political advertising only through accounts in their own name or those of their authorised intermediaries.

Corporate political donations: To prevent corporate political donations from resulting in conflicts of interest or being used to circumvent limits on donations by natural persons, legislators should consider limits on how much a single corporate donor may contribute to a political party, a candidate or both, including provisions to aggregate multiple donations from corporate vehicles with the same beneficial ownership.

Foreign donations: Policy to regulate foreign donations should consider the criteria by which foreign legal entities will be deemed as foreign – for example, tax jurisdiction, domicile or, for corporate donors, the percentage of foreign shareholders, or of revenue generated abroad.

Vote buying: In addition to criminalisation of vote buying, and monitoring and compliance requirements to prevent it, the legal framework must introduce effective protections, such as complaint and redress mechanisms for voters, campaigns and political organisations. It should define forms of prohibited voting inducements and outright vote buying in return for political support or to unduly influence voters. Reflecting good practice, governments could also consider limiting the amounts of consumables with potential to influence voters, such as food and drinks, that political parties and candidates can purchase during an election campaign.

3. Level Playing Field

A level playing field in political finance requires political parties and other contestants to have equitable access to financial opportunities to operate and contest elections. Equitable opportunities mean that differences in financial resources can be justified only on non-discriminatory, objective and reasonable grounds.

Levelling the playing field curbs the risks of corruption and helps ensure that elected officials serve the public interest, rather than the interests of a few wealthy donors. States often introduce donation limits and provide public funding to level the playing field. A political finance regime which introduces reasonable limits to donations or expenditure can help make elections more competitive, and constrain incumbents' advantage to attract more resources.⁶³ Reasonable limits can also help constrain the favourable access to elected officials that wealthy donors gain,⁶⁴ helping prevent undue influence. In order to avoid creating perverse incentives to underreport necessary campaign income and expenses, there should be careful consideration of what must be limited and during which periods so that they are effective in the specific context.⁶⁵

Relevant international commitments, obligations and standards

- African Charter on Democracy and Governance, art. 17.3 LINK: “[...] States Parties shall: [...] 3. Ensure fair and equitable access by contesting parties and candidates to state controlled media during elections.

- The OAS Inter-American Democratic Charter calls for special attention to be paid to “problems associated with the high cost of election campaigns and the establishment of a balanced and transparent system for their financing”.
- The CoE Recommendation ‘On common rules against corruption in the funding of political parties and electoral campaigns’ Article 3b(ii), recommends considering “(...) limiting the value of donations”, and in Article 9 “(...) establishing limits on expenditure on electoral campaigns”.⁶⁶
- The CIS Convention on the Standards of Democratic Elections, Electoral Rights and Freedoms in the Member States prescribes in Article 10.2 “equal possibilities”, “access to mass media” and “fair and open financing” for candidates and political parties. Article 12.2 prescribes “allocation on fair terms of budgetary resources”.
- The Southern African Development Community (SADC) Principles and Guidelines Governing Democratic Elections (2004) recognise in Article 2.2 the need for “equal opportunity for all political parties to access the state media”.
- In General Comment 25 on Article 19 of the International Convention of Political and Civil Rights adopted by the of the Human Rights Committee at the Fifty-Seventh Session (1996), paragraph19 states that “reasonable limitations on campaign expenditure may be justified where this is necessary to ensure that the free choice of voters is not undermined, or the democratic process distorted by the disproportionate expenditure on behalf of any candidate or party”.
- The OSCE-ODHIR and Venice Commission Guidelines on Political Party Regulation (2020), paragraph 242 recommend “(...) some degree of public funding” available to all parties “putting forth candidates for an election and enjoying a minimum level of citizen support. (...) A generous system for the determination of eligibility should be considered (...”).

Key issues related to a level playing field

Affluent candidates spending their own funds

The absence of limits on spending of personal funds creates an uneven playing field that favours wealthy candidates making it harder for others to compete against them. According to an academic study, 11 per cent of the world’s billionaires have run for office, and 80 per cent of the time, they won.⁶⁷ Highlighting the significant influence of money on electoral success, in the 2021 Uganda general elections candidates spent an nearly US\$130,000 in average to run for parliament, with some outliers spending over US\$250,000.⁶⁸ In over two thirds of constituencies, candidates with significant financial backing emerged victorious.⁶⁹

Affluent donors tilting the playing field

One hundred out of 181 countries do not establish limits for donations to candidates, and 96 do not do so for political parties.⁷⁰ This opens the doors to outsized influence on politics by a small number of affluent donors. A recent journalistic investigation into the funding of political parties in the European Union (EU) showed that parties can rely heavily on a single wealthy donor. Over three years, six relatives of former Italian prime minister Silvio Berlusconi transferred a combined US\$1.4 million to his party Forza Italia, with their family investment firm Fininvest adding another US\$540,000. In 2022 alone, their contributions amounted to roughly 13 per cent of the national party’s entire revenue.⁷¹ The same year, an entrepreneur and banker contributed US\$430,000 to a political party in Estonia, which represented 75 per cent of all contributions to the party and 35 per

cent of its total budget.⁷² In the United States, single big donors have donated billions of dollars in the form of direct and indirect political contributions, with a huge impact on the American political landscape.⁷³ In many cases, major donors receive substantial benefits – for example, in Bulgaria, the proprietor of the largest private postal service contributed US\$54,000 to a political party, and was appointed as a minister after the party's victory. Shortly afterwards, he made an additional donation of US\$115,000.⁷⁴ Similarly, Transparency International UK has exposed that over the last decade, a quarter of all nominations to lifetime appointments in the House of Lords are political donors to British parties, with 12 of these appointees having donated over 90 per cent of all donations made by all upper chamber members in the same period; there are no donation caps in the UK.⁷⁵

Donation limits circumvented

While limits on donations may be in place, donors can bypass these restrictions by segmenting donations. This may include splitting large donations into many smaller donations, or the use of “donor bots” capable of automating large numbers of political contributions below disclosure thresholds using stolen identities.⁷⁶ In Australia, donations were legally split into amounts below the disclosure threshold and distributed to the individual state and territory branches of a party between 2015 and 2016.⁷⁷ In Georgia, a threshold on corporate donations did not level the playing field, as companies still found ways to circumvent this by making donations through their employees.⁷⁸ In the United States, the founder of a large cryptocurrency exchange evaded donation limits through hedging over US\$100 million into 300 illegal individual donations to different campaigns, funnelled through associates who acted as straw donors.⁷⁹ US legislation contains numerous loopholes that enable similar tactics to circumvent limits. Political parties and candidates may be complicit in violating such limits, as happened in Peru ahead of the 2011 presidential election. A political party enrolled dozens of straw donors – many of them rank-and-file party members – to conceal outsized donations by falsely disguising them as multiple smaller donations.⁸⁰ In Denmark, ODIHR experts were told of the use of several “companies owned by the same owner” or various “associations, business clubs or other similar entities” to circumvent donation caps in 2022.⁸¹

High costs to secure nominations

In parts of Africa, Asia and Latin America, candidates are asked to incur in both formal and informal costs to political parties or party bosses in order to get their names on the ballot.⁸² Such costs can total in the range from US\$220,000 for Nigerian presidential aspirants, to US\$8,600 for parliamentary candidates in Zambia.⁸³ The recent revision of presidential nomination fees from US\$1,000 up to US\$20,000 by the Zimbabwe Electoral Commission has raised concerns over the participation of underrepresented groups in the country’s politics.⁸⁴ In Sri Lanka, candidates often need to demonstrate how much financial value they can bring to the political party, e.g. through funding for campaigns, in order to be put onto the ballot, which ultimately favours those with financial resources.⁸⁵

Problems with allocation of public funding to political parties and campaigns

If ill-designed or poorly implemented, public funding of political parties and campaigns can deepen inequities in competition, rather than levelling them. According to the EU Election Observation Mission, Mozambique’s 2019 general elections were contested on “an uneven playing field” in which the incumbent party abused state resources and enjoyed favourable media coverage. Public funding as provided for in law could have levelled the competition. However, the National Election Commission missed the deadline for its disbursement to parties and candidates by three weeks, well into the campaigning period. The African Union noted that the delay made it “difficult for

smaller parties who depend largely on state funds to campaign effectively and favoured the incumbent.⁸⁶ More recently, in Panama's 2024 general elections, the OAS raised concerns that most of the public funds transferred directly to political parties might have benefited presidential candidates, to the detriment of parliamentary candidates, due to the lack of criteria on how these resources should be distributed. This is compounded by the lack of electronic filing of reports of expenditures incurred with charge to public funding.⁸⁷

Policy options: level playing field

Standards to promote a level playing field

3.1. Restrictions on donations and spending

- a) The legal framework must introduce reasonable limits on donations from a single source to political parties, candidates and election campaigns. This includes candidates' donations to their own campaigns or political party. Donation limits may be based on accepted, indexed measures such as minimum salary or tax value units, rather than absolute amounts.
- b) To control the demand for political financing, the legal framework must limit expenditures by political parties, candidates and campaigns, following objective, reasonable and context-specific criteria – for instance, quotas or temporal limits for privately contracted broadcast and online communications.

3.2. Direct and indirect public financing

- a) The legal framework must ensure that where public financing schemes are in place, they are designed to encourage – rather than disincentivise – participation through donations and dues from a larger number of citizens.
- b) The legal framework should establish objective, non-discriminatory criteria for allocating all public political financing – both direct (i.e. monetary) and indirect (e.g. subsidised media access).
- c) The receipt, management and disbursement of direct public political financing must be subject to the same conditions as the management of public funds, as well as to strict bookkeeping, reporting, public disclosure and audit requirements.

3.3. Media access and ownership

- a) Among others forms of public funding, the legal framework must establish subsidised access to public media outlets for all political parties, at least in campaign periods, following reasonable allocation criteria.
- b) Media outlets should disclose their full ownership structure, including beneficial owners, and should uphold the highest integrity standards in their political coverage.

3.4. Internal party governance

- a) To mitigate corruption, bribery and reputational risk, and ensure that public and private funding is adequately managed, political parties must adopt, publish and periodically review their own integrity policies (e.g. codes of conduct, rules or guidelines), including during nomination and campaign periods.
- b) Governments should require political parties to disclose their criteria for allocating public funds between candidates.

3.5. Public funding to support underrepresented groups

- a) The legal framework should ensure that direct and indirect public funding is partly used to level the playing field for women, youth and other underrepresented groups, such as gender, sexual, ethnic, racial and religious minorities, those living in poverty, and others. Political parties must also have specific policies in place to ensure that adequate funds are allocated to support the participation of underrepresented groups.

Further recommendations to meet future challenges

Limits on donations: These limits should be carefully considered and calibrated alongside other measures, to ensure that they contribute to level the playing field, while not resulting in substantial increases in undisclosed donations.

Self-financing: It is crucial that limits are also applied to self-financing. Reflecting good practice, to better control self-financing of campaigns, the legal framework should ensure that candidates and their immediate family members provide an accurate declaration of domestic and foreign interests, assets and income prior to elections.

Provision of public funding: Where public funding is made available, the legal framework must limit discretion over how much funding is distributed in total to parties and candidates, and over the criteria used to determine comparative allocations for both regular and, where appropriate, campaign activities.

The criteria for the allocation of public funding in campaign periods must ensure that all candidatures enjoying a minimum level of citizen support are eligible to access public funds in a timely manner, subject to reasonable conditions. Legal frameworks must also include eligibility criteria for new political parties to receive public funding, such as levels of citizen support based not only on previous election results, to ensure that voters are given the alternatives necessary for a real choice.

Indirect public funding: The allocation of free airtime to political parties or candidates running for elections can help the state meet its responsibility to ensure an informed electorate. Where such support is available, the amount and timing of airtime must be distributed ensuring a level of equitability, and that take into account proven levels of support of new political parties.

Citizen participation: Reflecting good practice, schemes for public funding of political parties and candidates should create incentives for participation of citizens from the concerned constituencies through small donations and membership fees. For instance, direct public funding could be tied to match amounts raised or through tax-deductibility schemes.

Internal party governance: Reflecting good practice for internal party governance, governments should require political parties to demonstrate the criteria used for nomination and selection of party leadership and election candidates.

4. Gender Equality

The principle of gender equality in political finance contributes to levelling up representation of women, and members of other groups marginalised on account of gender, in nominations and elected office. Entrenched gendered stereotypes, intersecting systematic discrimination, the financial and time-based demands on primary caregivers, and inadequate flexibility and support – financial and otherwise – from political parties are among the factors hindering women, and sometimes actively preventing them, from registering and standing as candidates. Women from less affluent backgrounds are consistently situated as outsiders, experiencing financial gaps, compounded by having to challenge advantaged incumbents, who tend to attract more funds;

facing higher selection and election costs to overcome lower visibility, and by often being less connected to moneyed networks. By ensuring that all women politicians and candidates have access to the same financial resources and support as men, nomination procedures and elections are likely to become more competitive and representative.

Relevant international commitments, obligations and standards

- Article 7 of the Convention on the Elimination of All Forms of Discrimination against Women (CEDAW) lxxxviii prescribes measures to eliminate discrimination against women, in particular ensuring “to women, on equal terms with men, the right: (a) To vote in all elections and public referenda and to be eligible for election to all publicly elected bodies”.
- UN CEDAW General Recommendation 23 (1997), paragraph 32, encourages political parties “to adopt effective measures, including the provision of (...) financial and other resources (...) to overcome obstacles (...) and ensure that women have an equal opportunity in practice to (...) be nominated as candidates for election”. Paragraph 22 of General Recommendation 25 (2004) further clarifies that “the term ‘measures’ encompasses a wide variety of legislative, executive, administrative and other regulatory instruments, policies and practices, such as (...) allocation and/or reallocation of resources (...)”.
- The Recommendation of the Committee of Ministers of the Council of Europe (2003)3 on Balanced Participation of Women and Men in Public Decision Making, recommends in Article A.4 that countries (...) “consider action through the public funding of political parties in order to encourage them to promote gender equality”.
- The OSCE-ODHIR and Venice Commission Guidelines on Political Party Regulation (2020), paragraph 244 requires that “allocation of public funds based on party support for women candidates may not be considered discriminatory (...) and should be considered in light of ‘special measures’ (...) and contingent on compliance with requirements for women’s participation”.
- UN General Assembly Resolution 66/130 on Women and Political Participation calls on all Member States to: “enhance the political participation of women, to accelerate the achievement of equality between men and women and, in all situations, including in situations of political transition, to promote and protect the human rights of women with respect to: (a) Engaging in political activities; (b) Taking part in the conduct of public affairs; (c) Associating freely; (d) Assembling peacefully; (e) Expressing their opinions and seeking, receiving and imparting information and ideas freely.”
- Article 4 of the Inter-American Convention on the Prevention, Punishment and Eradication of Violence against Women, also known as the Convention of Belem do Pará, recognises that “[e]very woman has the right to the recognition, enjoyment, exercise and protection of all human rights and freedoms embodied in regional and international human rights instruments [including] [t]he right to have equal access to the public service of her country and to take part in the conduct of public affairs, including decision-making”.
- Article 9 of the Inter-American Democratic Charter (2001) recognises that “[t]he elimination of all forms of discrimination, especially gender, ethnic, and race discrimination, as well as diverse forms of intolerance [...] contribute to strengthening democracy and citizen participation”. Article 28 of the Charter specifies that “[s]tates shall promote the full and equal

participation of women in the political structures of their countries as a fundamental element in the promotion and exercise of a democratic culture.”

- Article 9 of the Maputo Protocol on Women’s Rights in Africa specifies that: “States Parties shall take specific positive action to promote participative governance and the equal participation of women in the political life of their countries through affirmative action, enabling national legislation and other measures”.
- Article 13 of the SADC Protocol on gender and development (2008) calls on states parties to “adopt specific legislative measures and other strategies to enable women to have equal opportunities with men to participate in all electoral processes including the administration of elections and voting”.

Key issues related to gender equality

Gendered challenges to accessing funds

Women often face greater challenges than men in securing the resources needed to obtain a party nomination or run for office. This disparity exists globally, as women typically earn less than men, dominate low-wage occupations, are underrepresented in leadership roles, possess fewer personal assets and have less control over their income.^{xxxix} It particularly affects women from more disadvantaged backgrounds.

In Uganda, for example, over 80 per cent of men candidates secured loans to finance their campaigns, as opposed to only 18 per cent of women candidates.^{xc} In Morocco, women are also less likely to receive nominations from party bosses, as they are believed to be less likely to bring in funds from private sources.^{xcii} In Zambia, civil society activists have raised concerns that women face stigmatisation and are victims of criticism and smear campaigns when actively asking for funds to finance their campaigns. In Indonesia, despite an increase in the number of women elected to parliament in 2019, many successful women candidates had “dynastic connections”, coming from powerful, affluent families with financial and other resource advantages.^{xcii} Women candidates from outside these networks face the need to campaign more extensively, yet donors generally prefer to contribute their money to men rather than women candidates.^{xciii}

Cost of campaigning higher for women^{xciv}

In addition to difficulties raising funds, many women face additional financial and time-based demands related to childcare. Women also contend with higher costs of standing for election, due to various factors, often including lower public visibility, the need for physical security measures, standing for election in more competitive constituencies, and having to compensate for the negatively biased image that some segments of the electorate have of women candidates. Studies in Uganda and Tanzania indicate that women must spend significantly more than men to win elections.^{xcv} In Uganda’s 2016 elections, women parliamentary candidates who won a seat spent 93 million Ugandan shillings (around US\$25,000) more than men in their campaign.^{xcvi} Women have to navigate male-dominated party structures and overcome pervasive stereotypes,

leading to more spending.^{xcvii} In Africa, women are assigned to constituencies where the party's popularity is weaker, which also necessitates higher expenditure.^{xcviii} In addition, running for office is generally more challenging for new candidates compared to incumbents, and incumbents are often men.

Lack or abuse of gender-targeted funding

Due to these barriers, targeted financial support for women candidates is essential to ensure a level playing field. While 70 per cent of countries provide direct public funding to political parties, only 17 per cent have gender-targeted public funding to promote women's political participation.^{xcix} Where public funding is not earmarked for women candidates, public funding can result in further marginalisation. In Türkiye, for example, despite increasing levels of women representation in parliament, the biases in nomination and the distribution of allotted public funds to political parties remain, and only few parties have decreased nomination fees to women and issued guidelines to direct public funds to party branches and women organisations within their parties.^c In some countries, there has been backsliding from more progressive standards. For example, in Georgia, parliament abolished in April 2024 a rule by which a party would receive a 30 per cent bonus in addition to its basic public funding if women candidates accounted for at least one third of the party's list and overrode the veto by the President in May 2024.^{ci}

While gender-targeted public funding or quota systems are essential tools for promoting gender equality in politics, the effectiveness of these systems is compromised if they are abused. South Korea and Panama provide examples of countries where political parties receive gender-targeted public funding but no gains in women representation in elected office materialise. In both countries, there are indications that gender-earmarked resources are used ineffectively.^{cii} In other cases, such funds are used in activities with little effect on women's access to politics.^{ciii} Symbolic compliance with eligibility requirements to meet conditionality was mentioned as an issue in our consultations. In the Democratic Republic of Congo, despite constitutional quotas mandating 30 per cent female representation in political parties, enforcement is undermined by political patronage and corruption.

Violence against women candidates and politicians

Research shows that female politicians are more likely to become targets of physical and psychological violence while in office.^{civ} Research findings also suggest that 8 per cent of the female targets of political violence in politics are women candidates for office.^{cv} In Italy, for example, marginally elected women mayors are approximately three times more likely to experience an attack than their male counterparts. Women are more likely to be targeted because of their gender identity than because of policy choices.^{cvi} Widespread online harassment of female candidates, is far more likely to include comments about their physical appearance or threats of sexual assault, rather than to their performance of official duties that is more predominant among men.^{cvi} This suggests that gender-based violence is best tackled through effective public safety measures for women candidates and newly elected women in the short term, combined with longer-term educational interventions.^{cviii}

Policy options: gender equality

Standards to promote gender equality

4.1. Targeted financial measures to increase women's representation

- a) The legal framework should make indirect and direct public funding for political parties conditional on criteria of gender equality in party positions and candidate lists. A significant portion of public funding should be earmarked for political and campaign activities most likely to positively impact the representation of women in politics, particularly those from underrepresented communities. Indirect funding should include, where applicable, subsidised private security on the campaign trail, as well as resources for protection against online harassment.

4.2. Publication of gender disaggregated information

- a) Political parties must record and report campaign income and expenditure with gender disaggregated information. The oversight body should publish this information, as well as further analysis and steps to address gender-specific barriers.

Further recommendations to meet future challenges

Gender-sensitive funding criteria: Reflecting good practice, the legal framework should, in addition to earmarking public funding to activities likely to impact women representation, also set gender-sensitive criteria for the allocation of indirect public funding, such as publicly funded access to broadcast, print and other relevant media for political parties, based on, for example, the proportion of women candidates or women in senior party positions. Political parties must develop and issue internal rules for the equitable and transparent allocation of party funds and resources between women and men in party positions and candidate nominations. The management, bookkeeping and reporting of gender-targeted public funding should be kept separate from other sources and, where possible, should be carried out and overseen by specialised party teams or committees. Policymakers could also consider gender-sensitive, differentiated donation and expenditure caps.

Publication of gender disaggregated information: Reflecting good practice, the legal framework should provide clear guidance for the agency providing oversight for political finance to publish further gender-differentiated analysis.

Non-financial measures: Governments must provide women with extra security on the campaign trail, protections against online harassment during campaign periods, and special measures to access justice, so they can raise grievances and seek remedy effectively, free of intimidation or financial constraint. Governments should also consider special provisions for childcare, transport and other support measures for women candidates.

After every election, States should assess the gender-specific barriers disproportionately impacting women, and consider whether any temporary measures in line with CEDAW should be taken to address these in future election cycles.

5. State Neutrality

Governments have at their disposal a vast array of resources. Discretion over the use of financial and administrative resources must be properly regulated to avoid their misuse by incumbents to secure electoral benefits for themselves. State neutrality in elections and campaigns is therefore of paramount importance to ensure integrity in elections and in public office. Abuse of state resources refers to “the undue advantages obtained by certain parties or candidates, through the use of their official positions or connections to governmental institutions, to influence the outcome of elections”.^{cix} Just few countries (35 out of 181) have no legislation to prevent the exploitation of state resources for electoral benefit.^{cx}

Some examples of such exploitation are easier to spot, such as state media supporting the governing party candidate; civil servants campaigning during working hours, or the use of government vehicles and personnel. Yet many instances are subtler, such as the manipulation of government policies and programmes based on patronage.^{cxi}

Relevant international commitments, obligations and standards^{cxii}

- The UN International Code of Conduct for Public Officials (1997), Article 11, prescribes that “political or other activity of public officials outside the scope of their office shall (...) not be such as to impair public confidence”.
- UNCAC (2003), Article 17, prescribes that signatories shall establish as criminal offences “the embezzlement, misappropriation or other diversion by a public official for his or her benefit or for the benefit of another person or entity, of any property, public or private funds (...)” and in Article 19 “[...]the abuse of functions or position, that is, the performance of or failure to perform an act, in violation of laws, by a public official in discharge of his or her functions, for the purpose of obtaining an undue advantage for himself or herself or for another person or entity.”
- SADC Norms and Standards for Elections in the SADC Region, 3(ii): “In the interest of creating conditions for a level playing field for all political parties and promoting the integrity of the electoral process, parties should not misuse public funds in the electoral process. The electoral law should prohibit the Government to aid or to abet any party gaining unfair advantage.”^{cxiii}
- The Council of Europe Recommendation Rec (2003)4 of the Committee of Ministers to member states on common rules against corruption in the funding of political parties and electoral campaigns, Article 5.c, recommends that “States should prohibit legal entities under the control of the state or of other public authorities from making donations to political parties”.
- The OSCE/ODIHR and Venice Commission Guidelines on Political Party Regulation (2020)^{cxiv} recommend that “(...) Incumbent candidates and parties must not use state funds or resources (...) to their own advantage”. Paragraph 252 states that “legislation should clearly define what is permissible use and what is considered abuse (...)”. Paragraph 253 advises on types of abuse that “should be expressly and universally banned”, including “the use of public premises, office

equipment, or public employees for the promotion of the programme and actions of the governing party”; the use of resources “to slander and denigrate opposition parties (...), the use of subsidies for party donations”, and “the manipulation or intimidation of public employees (...”).

Key issues related to state neutrality

Abuse of state resources, including material and human resources

Incumbents have control over a vast array of public resources which can be used in election campaigns to secure electoral benefits for their party or candidate. These resources include, among other things, public vehicles and premises – state or municipal; personal information of citizens; public email services or websites to sponsor state or local government communications; the working time of public employees.

Examples of abuse of such resources are numerous around the world. In Bolivia and Mozambique, EU election observation missions and local media outlets detected widespread abuse of public vehicles and buildings by incumbent candidates during election campaigns.^{cxv} In Kenya, EU and AU election observers have reported that incumbents used state vehicles and facilities such as public schools, government offices and even stadiums for political campaigns.^{cxvi}

In Serbia’s December 2023 elections, the ODIHR Observation Mission report noted that instances of pressure on public-sector employees and misuse of public resources tilted the playing field, providing undue advantage to the ruling party and coalition, and blurring the line between state and party.^{cxvii}

Abuse of policies and budgets for incumbents’ electoral benefit

The intentional manipulation of public policies and budgets is another abuse of incumbency for electoral benefits. This can range from discretionary spending or temporarily raised salaries, pensions or other benefits, to tax cuts or investments in infrastructure. Such tactics are often adopted before the official campaign period.

Examples from Argentina and Guatemala in the 2023 elections show that the scale of financial abuse of incumbency – priced at several percentage points of the country’s gross domestic product – may have impacted the economy at an aggregate macroeconomic level, rather than just tilting the playing field. In Guatemala, estimates of public budget transfers during the election period reached nearly US\$350 million, funding infrastructure, cash transfers, and temporary domestic gas and utilities subsidies to households, to name just a few examples.^{cxviii} In Argentina, the government carried out fiscal measures worth an estimated US\$2.5 billion in the forms of value-added tax or income-tax exemptions to different groups such as pensioners, other targeted cash transfers to other groups, and rebates for domestic tourist travel, among other types of handout.^{cxix}

In some instances, state-provided goods are distributed by political candidates in order to take the credit for such disbursements. In the campaign leading to Hungary’s April 2022 parliamentary elections and referendum, the ODIHR Election Observation Mission reported “multiple formal complaints about a government program to distribute laptops in schools, alleging that candidates and officials used the delivery of the laptops as a campaign tool”, as well as participation of public-

sector workers in campaign events. The mission also reported to have received allegations that local government officials used intimidation or pressure against voters to prevent them from attending opposition events.^{cxx} Similarly, in Zambia, the EU Electoral Observation Mission reported that “the use of state resources was evident, with a broad range of state development, social protection, and relief programmes being used in the campaign” by party officials instead of the relevant local public officials, as well as the sharp increase in beneficiaries of the Social Cash Transfer programme, and the manipulation of other public subsidies to get an electoral advantage by the ruling party.^{cxxi}

Abuse of security forces

Another egregious abuse of incumbency is the deployment of security forces, law enforcement and other types of state force to intimidate or discourage candidates and activists from opposition parties. In Tunisia, at least 80 members of the country’s largest opposition party, Ennahdha, were arrested ahead of the October 2024 elections, which added to several previous arrests of leading figures seeking to challenge the incumbent president seeking reelection.^{cxxii} Similarly, in Georgia, the former deputy head of the State Security Service blew the whistle in 2022 on the use of security services to intimidate and pressurise voters and candidates. The state prosecution service has launched an investigation, but so far there have been no prosecutions or convictions.^{cxxiii}

Abuse of state media

In many countries, abuse of incumbency through the control of media is a recurring challenge. Around the world, incumbents have used state media or captured private media to gain unfair advantage during election periods. In Hungary, the media operate in an increasingly concentrated market following the in 2018 transfer of ownership of 476 media outlets to the Central European Press and Media Foundation (KESMA), an outfit controlled by allies of the ruling party. With the change of ownership of the largest news portal Index, only a handful of independent media operate at the national level. Public media is managed by the government and used to run campaigns against opposition candidates during election periods. Media supervision authorities are also complicit, through not applying measures or sanctions for state media violations.^{cxxiv} In Sri Lanka, state media has been used by the ruling party to broadcast political advertising which had not been paid for, in contrast to other parties, which had to pay.^{cxxv} Similarly, in Zambia during the 2021 general elections, international observers noted that media coverage of the campaign was highly polarised, with the state media granting disproportionate coverage to the president during prime time, blurring the line between government functions and campaign activities.^{cxxvi} In Türkiye, ahead of the 2023 general elections, the incumbent president and the ruling parties enjoyed an unjustified advantage, including through biased media coverage. During the electoral period, the broadcast media regulator imposed sanctions on media critical of the government or the ruling coalition.^{cxxvii}

Policy options: state neutrality

Standards to promote state neutrality

5.1. Prohibition of the misuse of state resources for electoral purposes

- a) The legal framework should unambiguously define permissible and prohibited uses of human, financial, material and other public resources by political parties or candidates in the context of election campaigns. Legislation must provide protections for officials who are coerced or intimidated into breaching their neutrality, including safe complaint and reporting mechanisms.
- b) The legal framework should prohibit state- and public-controlled entities from making financial or in-kind contributions to political parties, candidates or election campaigns.

5.2. Declaration and reimbursement of costs associated with the use of state resources

- a) The legal framework must require that candidates and political parties declare the value of any state resources they use due to, for example, security concerns, or for other extenuating reasons; as well as establish the mechanisms to reimburse these costs.

5.3. Empowering relevant oversight authorities to monitor and sanction abuse of state resources

- a) The legal framework must give the election management body or other relevant oversight bodies the authority to monitor compliance with state neutrality. Oversight bodies must be able to collect evidence that can support the imposition of penalties through administrative proceedings or, where applicable, criminal prosecution.

5.4. Ensuring neutrality of state authorities involved in election campaigns

- a) The legal framework should ensure the neutrality of public officials by establishing proportionate rules on how and when public officials can engage in campaigning activities in their personal capacity, and when they should recuse themselves or resign from office.
- b) Personnel from law enforcement agencies, the prosecution, the judiciary and the security forces should abstain from any action with the intended purpose of undermining the electoral outcomes of any candidate or political party. The legal framework should provide for sanctions for any such abuse of office.

Further recommendations to meet future challenges

Limits to extraordinary public spending: Reflecting good practice, the legal framework should limit extraordinary public spending immediately prior to and during election campaigns, including any extra-budgetary salary increases, pension increases, tax cuts, discretionary benefits and cash handouts, or hiring of temporary employees or consultants.

Codes of conduct to protect public resources: Governments should introduce codes of conduct for public officials and civil servants, including the requirement not to use public resources for campaign purposes, with sanctions for infringements. An oversight agency must promote and enforce such codes of conduct and ensure that positions and institutions that oversee the use of

public resources especially vulnerable to abuse in the context of election campaigns, are well monitored.

Full transparency in constituency development funds: Where specific funds have been earmarked for constituency development, their disbursement should be subject to the highest transparency and integrity standards, including clear disbursement criteria, regular audits and, where possible, democratic oversight by elected local or regional councils.

Empowering relevant oversight authorities: In monitoring and sanctioning abuse of state resources, oversight authorities should be mandated to report on any social, fiscal or budgetary policies manipulated for electoral benefit.

Neutrality of state media: State media should set and observe clear and equitable editorial guidelines to ensure neutrality in the coverage of election campaigns. These should include unbiased and impartial reporting, and balanced coverage or airtime for political parties and candidates.

6. Accountability

Political finance regulations must be monitored and enforced. Accountability and oversight are a key link in the chain of political finance integrity. Oversight bodies must be empowered to verify and publish financial reports. Otherwise, parties, candidates, campaigns and third parties can conceal information and the public will remain in the dark. An effective agency, along with stakeholder education on how to file complaints, is needed to prevent breaches of political finance regulations and offences from going undetected and unsanctioned, and non-compliance from being deterred, leading to impunity.

Transparency International's analysis of the gaps between law and practice of political finance transparency in 109 countries surveyed in the 2021 *Global Data Barometer* suggested that having an agency appropriately empowered to verify political finance reports was consistently associated to the greater availability of its publication online. This relationship held strong even after controlling for a country's level of development.^{cxxviii}

Relevant international commitments, obligations and standards

- UNCAC articles 24 and 23.1, on concealment and conversion of proceeds of crime, may apply indirectly.
- The Council of Europe Recommendation Rec (2003)4 of the Committee of Ministers to member states on common rules against corruption in the funding of political parties and electoral campaigns^{cxxix} in its article 14 recommends that countries "provide for independent monitoring (...) that should include supervision over the accounts of political parties and the expenses

involved in election campaigns as well as their presentation and publication”. Further, article 15 calls for “(...) the specialisation of the judiciary, police or other personnel in the fight against illegal funding of political parties and electoral campaigns” and article 16 that “States should require the infringement of rules concerning the funding of political parties and electoral campaigns to be subject to effective, proportionate and dissuasive sanctions”.

- The OSCE/ODIHR and Venice Commission Guidelines on the Regulation of Political Parties, paragraph 272 states that “sanctions should be (...) dissuasive in nature, (...) objective, effective, and proportionate (...).” Paragraph 274 outlines options for sanctions, including: administrative fines; partial or total suspension or loss of public funding; ineligibility for state support; forfeiture to the state treasury of undue financial support; ineligibility to present candidates; and rejection of the party’s electoral list or individual candidates. In cases involving significant violations, paragraph 274 guidelines recommend criminal sanctions against the party members responsible for the violations, annulment of a candidate’s election to office, and loss of registration status for the party.

Key issues related to accountability

No effective agency with authority and resources to detect illicit political finance

The EU election observers’ guidelines stress that “full reporting and disclosure requirements are essential for a transparent political finance system, but they are meaningless if there is not a strong and effective enforcement mechanism in place”. They highlight that oversight agencies must be “free from political pressure” and equipped with “a broad range of sanctions to ensure they are effective, proportionate and dissuasive,” including administrative warnings, fines, loss of public funding, or even criminal penalties.^{cxxx}

When looking at the global statistics, only 55 out of 109 countries surveyed by the *Global Data Barometer* have rules which empower an agency or official to ensure the accurate and timely collection and publication of political finance data. Insufficient oversight and accountability are an issue across all regions.

In Germany, for example, the unit responsible for overseeing political finance is part of the administration of the federal parliament, rather than an independent oversight agency. It is not well resourced, with a small number of specialised staff to oversee all political parties, and does not have investigative powers.^{cxxxii}

In the Asia Pacific region, examples from contexts as varied as New Zealand, Pakistan and Sri Lanka show that despite the existence of agencies mandated with overseeing political finance, their capacity and resources remain too limited to proactively exercise their powers.^{cxxxii}

In Africa, many countries have not yet passed comprehensive laws and made provisions on political finance, and lack adequate resources for effective oversight. For example, in Madagascar, although a law on political finance has been adopted and an oversight body – the *Commission de Contrôle du Financement de la Vie Politique* – established, it still faces significant operational constraints.

Although the commission can gather evidence of infringements of political finance regulations and refer findings for further investigation to the financial intelligence unit and relevant public

prosecutor's office, it does not possess the adequate resources to carry out its mandate. By 2024, the commission only had access to a one-room office within the premises of the *Cour des Comptes* (Audit Court) And by 2025, there was no official record of investigations of political finance laws breached since 2018.^{cxxxiii}

Lack of cooperation between agencies

Breaches of political finance legislation often go undetected or are not acted on due to a lack of coordination and cooperation between relevant agencies with complementary or overlapping mandates in many countries. Without effective coordination mechanisms, oversight bodies such as electoral management bodies and audit agencies may fail to collect evidence and report on infringements of political finance legislation that amount to criminal liability to appropriate law enforcement institutions, while law enforcement institutions may not share with oversight bodies information which could be useful for their administrative proceedings.

Regional consultations conducted by Transparency International in Asia and the Pacific, Latin America and Africa indicate that there is room for increased cooperation, data-sharing and joint investigations between political finance oversight bodies and financial intelligence units, tax authorities, anti-corruption agencies, law enforcement units, the prosecution and the judiciary. For example, neither in Zambia or Indonesia's detected rises of suspicious transactions in election campaign years (see section: Use of political finance for money laundering, page 7), , , there is evidence of referrals to competent authorities mandated to further investigate potential breaches of political finance rules.^{cxxxiv}

Insufficient or non-enforced sanctions and failure to investigate

Most countries impose some type of criminal, civil, or administrative sanctions for political finance infractions. According to the International IDEA *Political Finance Database*, only two countries out of 181 do not provided for sanctions in their legislation. Among the top three most common sanctions, 154 countries impose fines, 107 include prison sentences and 57 impose a loss of public funding.^{cxxxv} However, such sanctions tend to be non-dissuasive and non-proportionate.

A recent study conducted by Transparency International chapters in the Western Balkans and Türkiye found that electoral management bodies have either entirely failed to levy sanctions despite having noted non-compliance, as in Kosovo, or have imposed minimal sanctions, and, in North Macedonia and Serbia, have referred only one case to the prosecution.^{cxxxvi}

In Ghana, where the electoral management body is in charge of overseeing political parties' activities, and the law requires political parties to file audited accounts and financial statements, most parties consistently fail to comply. According to a domestic think tank, CDD Ghana, The Electoral Commission has likewise not been diligent in enforcing these provisions, and when it attempts to do so, political parties often resist or push back against the application of sanctions. . In Kenya, there has been a campaign finance law in place for 11 years, but it is still not yet operational, and Parliament keeps stalling on endorsing regulations.^{cxxxvii}

In the Americas, criminal and administrative sanctions are often not matched with the corresponding resources to strengthen the investigative capacities of electoral oversight bodies, law enforcement, prosecution and the judiciary, leading the OAS to “conclude that significant enforcement challenges have been identified in countries with penalty systems in place for electoral financing”.^{cxxxviii} Elsewhere, oversight bodies have no investigation or sanctioning powers, as with the *Commission Nationale des Comptes de Campagne et des Financements Politiques* in France.^{cxxxix} Even where they are applied, sanctions are often imposed long after violations took place. For elections, this can sometimes be months or years after the campaign.

Policy options: accountability

Standards to promote accountability

6.1. Establishing an effective oversight body or bodies

- a) The legal framework should empower an oversight body with the mandate, independence and financial autonomy to monitor, oversee, enforce and facilitate compliance with political finance regulations, including by applying sanctions for breaches.
- b) Oversight bodies must make sustained financial investments in human and technological resources to support compliance with financial reporting. They should increase their verification and audit capacities, including through dedicated auditors and on-site monitors.
- c) The legal framework should establish reasonable sanctions and, where applicable, personal liability for the use of threats, intimidation, or other attempts to influence an oversight body's decisions or work.

6.2. Promoting inter-agency cooperation

- a) Oversight bodies must proactively cooperate with other relevant state institutions and exchange information with them in the investigation of potential breaches of political finance regulations. These can include electoral management bodies, supreme audit institutions, anti-corruption agencies, financial intelligence units, tax authorities, law enforcement agencies and the judiciary.
- b) Oversight bodies must ensure that information exchange does not infringe on privacy or other civic and political freedoms, and is subject to democratic checks and balances against its misuse.

6.3. Strengthening sanctions and ensuring their enforcement

- a) The legal framework must establish civil, administrative, disciplinary and criminal sanctions for non-compliance with political financing regulations by political parties, candidates, campaigns and third parties. Sanctions must be effective, proportionate and dissuasive.
- b) The judiciary and prosecution must allocate sufficient resources and strengthen internal capacities to effectively investigate, prosecute and adjudicate breaches of political finance regulations.

6.4. Encouraging participation from society in campaign finance monitoring

- a) The legal framework must ensure that citizens, the media and civil society organisations (CSOs) have effective access to political finance information – including, but not limited to, detailed and timely information on the sources of private donations, in open data formats that facilitate scrutiny.
- b) Oversight bodies must collaborate with civil society and other watchdog groups by facilitating the deployment of monitors on the ground. Oversight bodies must also introduce and uphold practices supporting the right to information, except where legitimate national security and privacy concerns apply.
- c) Oversight agencies should ensure that citizens have the right to file complaints and initiate legal actions, either individually or through CSOs, and that appropriate reporting channels are in place.
- d) In accordance with international standards and best practices, oversight bodies should guarantee confidential, safe and secure reporting systems to facilitate the timely reporting of political finance-related offences. These systems must be accessible and gender sensitive, and oversight bodies should provide support and protection against unjustified treatment of any person reporting such offences, including whistleblowers, victims and their relatives.

Further recommendations to meet future challenges

Measures to ensure effective oversight: The legal framework must provide for bodies and agencies to draw up their own budgets to ensure they have the financial means required to discharge their responsibilities free from political constraints, as well as to be granted autonomy over their operations. In order to increase accountability, and reflecting good practice, oversight agencies should be required to report regularly on and publicise their work.

Defined cooperation modalities between oversight and competent authorities: These should include memoranda of understanding, joint investigations, joint task force operations, automated data exchange protocols, early red-flagging mechanisms for any suspicious activity by a political party or related to campaign finance, and sharing of information on decisions and sanctions.

Informal cross-border cooperation: Reflecting good practice, governments should promote informal cross-border cooperation to foster trust and improved collaboration between relevant agencies and their personnel. Informal cooperation can take the form of meetings and roundtables for communities of practice; exchanges of views, peer exchanges and similar collaborations.

Stronger sanctions and their enforcement: As mentioned in standard 6.3 above, non-compliance with political financing regulations by political parties, candidates, campaigns and third parties must be subject to effective, proportionate and dissuasive civil, administrative, disciplinary or criminal sanctions. These sanctions should include fines, suspension or loss of public funding, deregistration, loss of political office, and loss of nomination. The legal framework must provide for criminal liability against the party members responsible for significant violation(s). To uphold civil

and political rights, the legal framework must also ensure that anyone sanctioned for breaches of political finance regulations has timely judicial recourse to appeal.

Greater citizen and civil society participation: Campaign finance monitoring by citizens and CSOs can be an effective tool for accountability. Oversight agencies must collaborate with civil society and other watchdog groups by establishing the conditions to ensure that monitors can operate freely, and have free and ready access to the information they need to monitor different aspects of political finance. Monitoring should include state expenditures that could be abused for electoral gain, except for reasons of national security and privacy, where appropriate.

The right to file complaints: A key precondition for effective monitoring is ensuring that citizens have the right to file complaints and initiate legal actions as individuals or through CSOs, and that appropriate reporting channels are in place. Reflecting good practice, oversight institutions should raise awareness among citizens, the media and civil society on the legal avenues available to report and file political finance complaints, and on the applicable rules relating to admissible evidence and standards of proof.

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¹³⁶ Organization of American States (2021) “Political-Electoral Financing Systems in the Americas: A Perspective from the OAS Electoral Observation Missions”, P. 40. Available on: <https://www.oas.org/ext/DesktopModules/MVC/OASDnnModules/Views/Item/Download.aspx?type=1&id=1219&lang=1> (last accessed on 3 December 2025).

¹³⁷ Transparency France. (2025, September 22). Financement politique : renforcer les règles pour éviter de nouveaux scandales (p. 12). Available at: <https://transparency-france.org/2025/09/22/financement-politique-renforcer-les-regles-pour-eviter-de-nouveaux-scandales/>



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