

HANDBOOK WITH RULES OF MONITORING THE FINANCING OF POLITICAL CAMPAIGNS



1 Overall budget and planned expenditures

Has the political entity disclosed the total amount of planned expenses for the campaign, including a breakdown of the budget by type of expenditure and media?



Justification

Publishing in the media or on the official website the data on the total planned campaign expenses is a basic requirement of campaign transparency, and it increases voter confidence. However, for the transparency of the campaign, information must also be provided on the individual planned categories of expenses that the candidate intends to cover in the campaign.

This information makes it possible to create a relatively accurate picture of the tactics used by the candidate in the campaign, while the final reports on campaign financing often do not contain it.



Recommendation


Each political entity discloses the estimated amount of campaign expenditures with an indicative breakdown of the amounts allocated to different categories. Recommended categories of breakdowns of planned expenses:

- **Strategy and consulting** - consulting, consulting, surveys, creative proposals and unspecified PR and marketing services of advertising agencies.
- **Production** – especially graphic and photographic work, production of audiovisual materials and unspecified production of promotional materials.
- **Contact campaign** – especially the occupation of public space, the operation of election or petition stands, services connected with the implementation of press conferences and election rallies (refreshments, sound), musical accompaniment, production of promotional items and small gifts (from pens to balloons and ice creams/popsicles to teas etc.).


- **Outdoor advertising** – especially the distribution of posters and billboards and the rental of outdoor advertising areas, including stickers for cars and other means of transport and the installation of benches.
- **Flyers and newspapers** – production and distribution of flyers, leaflets, election newspapers and other materials that communicate the entity's program.
- **Advertising in the press** – costs of advertising in print media (whether national or regional).
- **Online promotion** – costs of promotion in the online space, whether as part of advertising on social networks (Facebook, Instagram, Twitter, YouTube), through online media, payments for advertising and placement of online banners. We also include expenses for agencies labelled "Facebook management" etc. in this category.

In the category of online expenses, we further recommend stating the ratio of expenses for online campaigns on social networks and internet search engines (Facebook, Twitter, Google, YouTube, etc.) to other online media (banner advertising, paid articles, advertisements on the internet) according to the following structure:

 Facebook: ___%

 Online media: ___%

 Other social networks: ___%

 Other Internet campaign costs: ___%

- **Others** – in particular, these are payments for the election team, coordinators, office rental, etc.

2

Expenditures before the announcement of elections

Has the political entity published information on campaign costs incurred before the announcement of the election (e.g. expenses for collecting signatures for a petition to submit a list of candidates)?



Justification

According to the law, the campaign period is considered to be the period of 30 days before the Election Day, except for extra-ordinary or early elections, when it's the CEC that decides about the campaign period. However, many political entities and candidates have been conducting their campaign systematically and openly long before this day.

To understand the true cost of the campaign, it is necessary to know how much this pre-official campaign cost and what were the sources of its funding.



Recommendation

The political entities publish on their platforms and official website brief information about how much their campaign cost from the day they start conducting activities, and information about what sources the campaign is being paid for - who are potential donors.

If the political entities and their candidates openly identify the start time of the campaign and its costs before the election is announced, the transparency of the entire race increases many times over.

3

Income structure

Does the political entity disclose preliminary sources of campaign funding, including their own contribution? Does the political entity have rules for accepting campaign donations, or declared in advance that they will not accept donations from certain entities? Does it post updated information about its donors?



Justification

The credibility of the political entities depends on the rules for accepting donations, so it is necessary for them to declare where and how they intend to finance the campaign.

The transparent account would serve as a means for public control of campaign expenses and, to a limited extent, makes it possible to obtain a basic idea of the structure of donors (legal or natural persons), the possibility to determine the actual donors and the source of funds for campaigning.



Recommendation

Political entities declare how much money they will put into the campaign from different sources. Whereas, their candidates declare how much they will put from their own resources, or from own accounts.

The political entities and their candidates should also publish:

- A preliminary planned amount of own funds for the campaign,
- B a clear, continuously updated list of financial and non-financial donors, including information on which date the list is current.

4 Subcontracting chains

Does the political entity publish a list of suppliers and subcontractors of services associated with the campaign (including a list of suppliers used by agencies)?



Justification

Due to the current agency concept of campaign organization, voters often have no chance to find out who the specific recipient supplier/subcontractor of campaign-related contracts is, because expenses are often obscured by outsourcing services to agencies that deliver the entire “campaign” package.

From the point of view of the political entities and candidates’ needs, it is practical, but not from the point of view of the transparency of campaigns for citizens.



Recommendation

The political entities should therefore publish a list of all subcontractors, for example providers of advertising space, advertising, printers, manufacturers of promotional items, audio-visual productions, consultants, legal services, etc.

This information should also appear in the final campaign finance report, which the entities must submit to the Office.

5 Personnel and actors in the campaign

Does the political entity and its candidates inform about the entity responsible for conducting the campaign and apply to it the legal requirements for transparency (election account, disclosure of income, etc.)?



Justification

The campaign can be conducted “with the knowledge” of the political entities by an independent entity, which in turn is not subject to the same election legislation as the political entity (does not have to register, does not have to report, etc.)



Recommendation

In the event that an independent legal entity conducts the campaign for the political entities, the political entities voluntarily apply the requirements of transparency and accountability.

6 Election team and cooperating agencies

Has the political entity and its candidates published the composition of their election team, which is involved in the strategic planning of events, their organization, etc., indicating the roles of individual team members in the campaign (including individual advisers)? Does the political entity and their candidates publish the names of the agencies and individual advisers (media, PR, consulting, legal) with whom they work on the campaign?



Justification

To understand the strategy of the campaign, it is necessary to know the personnel composition of its executive team, and the same applies to the knowledge of those who participate in the promotional part of the campaign, either individually or within companies, studios and agencies. The opportunity to find out who is behind the campaign and who participates in its practical management is one of the basic elements of its transparency. This limits the potential for conflict of interests, political corruption and non-transparent lobbying, thereby increasing the fairness of the entire political competition.

The effort to hide from the public the personnel and organizational side of the agitation creates the wrong impression that there is something inherently nefarious about political persuasion or the promotion of political ideas. However, the election campaign is a legitimate part of the democratic system, and as such should be conducted transparently.



Recommendation

Political entities and their candidates publish on their platforms and official websites at least the most basic information about the people and companies that devise and administer their campaigns.

7 Online Campaigns

Does the political entity and its candidates publish a list of all profiles on social networks (Facebook, Instagram, Twitter, YouTube, etc.) that will be used for campaigning in the campaign? Do they also inform how digital political marketing is re-financed on individual group accounts so that it is visible whether the political advertising is financed by the political entity, candidate, or third parties?



Justification

Campaigns on digital social networks form a significant part of the entire election campaign. In order not to suspect that some profiles are running a non-transparent campaign with the knowledge of the political entity or candidates subject in their favor, and to make the campaign clear and transparent, it is necessary to know all the profiles that participate in its management on behalf of the candidate.

Last but not least, you need to know how digital political marketing is refinanced on individual accounts. Each Facebook account can be paid from several credit cards, political parties and their candidates can pay for their paid posts themselves and then reimburse them through the accounting of a legal entity, or they can outsource all digital marketing to a media/PR agency, etc. There are many options, and information about of them are essential for the transparency of the campaign.



Recommendation

Electoral contestants publish a list of all social media profiles (Facebook, Instagram, Twitter, Tik Tok, YouTube and others) on the official website, together with their funding rules.

8 Electoral action

Does the political entity and their candidate publish a list of all public events within the campaign (meetings with voters, debates, cultural events, etc.) on their platforms or websites?



Justification

In order to distinguish events organized as part of the campaign (from all others, when, for example, the political entity and/or its candidates perform their political or state function), it is advisable to know their calendar in advance. Expenditures for election events count towards the limits on total spending.

Therefore, the political entities and their candidates themselves should carefully inform about which actions they include in the framework of their campaign. The idea is to guarantee a clear identification of the political presentation for which the political entities and their candidates “stand” and to distinguish it from other public outputs.



Recommendation

Publishing on the official website a list of planned election events and activities for the public, in any clear form, from a simple list by linking dates and places to an interactive map, etc. The same function can be well fulfilled by an overview (online and offline) of events on the official FB profile, etc.

On the contrary, informing about the activities of political entities and their candidates' ex-post or an overview of events that do not distinguish public appearances related to the performance of public office from the pre-election campaign will not fulfil the given function.

