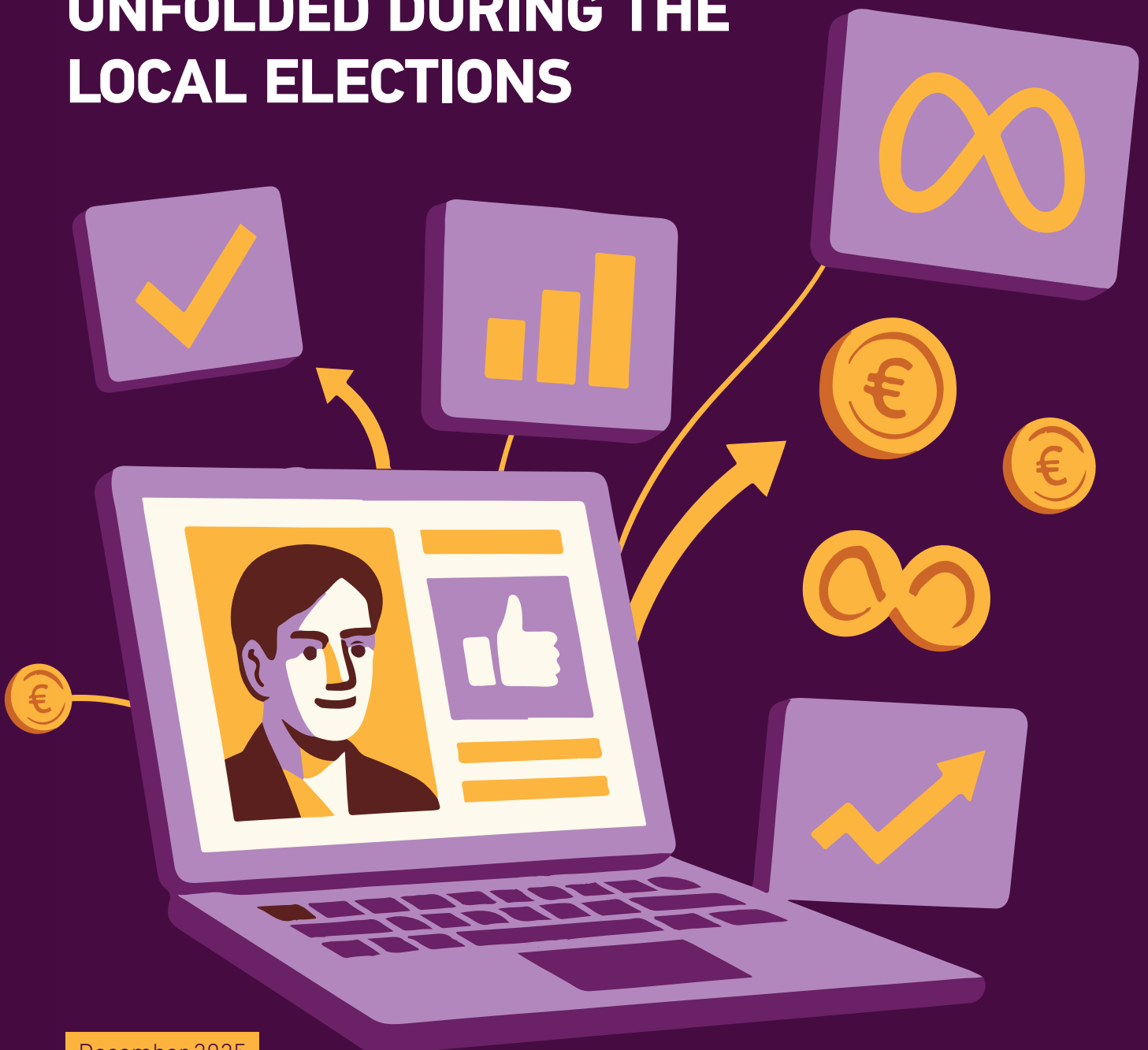


IN THE HANDS OF ALGORITHMS: HOW THE META CAMPAIGN OF MAYORAL CANDIDATES UNFOLDED DURING THE LOCAL ELECTIONS



IN THE HANDS OF ALGORITHMS: HOW THE META CAMPAIGN OF MAYORAL CANDIDATES UNFOLDED DURING THE LOCAL ELECTIONS

Analytical report on spending by mayoral candidates
on the Meta platform during the 2025 local elections

December 2025



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EXECUTIVE SUMMARY

The 2025 local elections confirmed that online campaigning in Kosova has become one of the principal and most structured forms of political communication. This shift provides a clearer picture of activity on the Meta platform, particularly Facebook and Instagram, and reveals the extent to which parties and candidates rely on sponsored content, how they shape their messages, and how much they are willing to invest in influencing voter perceptions at the local level.

During the first round of the campaign, mayoral candidates spent a total of 88,675 euro on online advertising. In the second round, in municipalities that proceeded to a run-off, an additional 25,416 euro were spent. Combined, the two periods reached a total of 114,091 euro. Although modest compared to other countries in the region, this level of investment reflects two parallel developments. One is the gradual professionalisation of political campaigning. The other is the deep inequality between candidates, parties and municipalities.

The most intensive campaigns appear in urban municipalities, particularly in major centres such as Prishtina, Prizren and Gjilan. These municipalities not only spent more but also displayed very different week-to-week investment patterns. In some cases, candidates concentrated their spending in the penultimate week, while in others the rhythm was more gradual and evenly distributed.

The run-off reshaped the entire digital landscape. In municipalities with a competitive race, Meta spending increased significantly. Prishtina stands out as the most extreme case. The two run-off candidates, Përparim Rama and Hajrulla Çeku, spent more than 21,000 euro combined during the run-off period alone. This level of

spending effectively created a separate and far more intense campaign than the first round. In several other municipalities, however, despite high political rivalry, spending remained modest.

Three distinct patterns emerge among political parties. LDK concentrated its investment pillars clearly, with Prishtina as its primary focus. LVV showed a more dispersed presence, with some candidates investing heavily and others very little. PDK adopted a more strategic approach, directing its funds mainly to competitive municipalities or areas where it sought to preserve its strongholds. Other parties appeared only in isolated cases. A similar pattern is seen among candidates in general, since most spent little or nothing, while a small group accounted for the vast majority of total spending.

Gender disparities are also pronounced. Although women candidates were few in number, their spending was significantly lower than that of male candidates, both in total volume and in the number of municipalities where women were present in competitive races. This reflects not only differences in available resources but also deeper systemic issues within political parties, where women are rarely placed in races with realistic chances of winning.

The most concerning finding, however, goes beyond political parties and candidates. Throughout the campaign, dozens of pages and portals with no formal links to electoral entities appeared and invested substantial amounts of money to influence the race. In several instances, these unidentified actors spent more to target a candidate than the candidate spent to promote his own campaign. This phenomenon demonstrates the presence of a parallel layer of electoral influence that does not ap-



pear in official reports and has largely remained outside the public debate.

Significant transparency gaps persist in the regulation of digital campaigning and in reporting by candidates themselves. Online advertisements are still not properly included in campaign finance declarations, and many candidates do not report them at all. This allows undeclared financing, creates an advantage for candidates supported by informal networks, and makes it harder for institutions and the public to assess the real impact of sponsored political communication in social media.



INTRODUCTION

In every electoral cycle, the way candidates communicate with voters is just as important as the political programme itself. In Kosovo, for many years electoral communication took place mainly on the ground, through rallies, direct meetings, public events, neighbourhood visits, presentations in cafés, gatherings in cultural centres and a heavy reliance on traditional media. This reality has started to change in a substantial way. The 2025 local elections are perhaps the clearest demonstration so far that political campaigning has entered a new phase in which digital platforms, especially the social networks Facebook and Instagram, have assumed a very different role and scale.

In a society where more than eighty percent of adults use Facebook and Instagram for information, debate and political content, candidates can no longer afford to ignore the online space. This has produced two parallel developments. The first is the natural extension of campaigns into social media, where candidates try to appear wherever voters spend their time. The second is the gradual professionalisation of sponsored communication, in which political advertisements are no longer random

but are planned step by step, with careful targeting and messages tailored to specific demographic groups.

In this context, the report presents concrete data collected directly from the Meta Ad Library and analysed in a systematic manner. The findings clearly show how parties structure their campaigns, the real inequalities between candidates in larger municipalities and those in peripheral races, the strength of run off campaigns that often outweigh the entire one month period of the first round, the focus of parties on strategic municipalities, gender based differences in spending and in the importance parties assign to women candidates, as well as new trends in political communication that are already shaping future elections.

In the coming electoral cycles, digital campaigning is likely to become even more aggressive. Parties will refine their targeting, and voters will be more exposed to personalised political messages. This makes an in depth analysis of online campaigns not only useful but necessary.



METHODOLOGY

This report is based on a dedicated dataset prepared specifically for the analysis of the digital campaigns of mayoral candidates. All data and figures on political advertisements originate from the Meta Ad Library, which is currently the only official global source for paid political ads on Facebook and Instagram. Relying on this source, KDI, through a team of monitors, collected data in a systematic way on the following elements:

- **name of the candidate**
- **municipality**
- **political party**
- **gender**
- **period of spending, broken down by week**
- **monetary value of sponsored advertisements, according to the one week intervals provided by Meta, and for the run off the entire period from the first round to the second**
- **type of advertisement where this information was available**

All values were taken for the official campaign period of the first round, as well as for the period from the first round until the run off.



KEY FINDINGS

When all digital campaign data from political party candidates are brought together, three central patterns emerge from the monitoring of spending on the Meta platform:

1. Unequal distribution of spending

Most of the overall sum, which exceeds one hundred and ten thousand euro, is concentrated in a small group of candidates and municipalities. The majority of candidates do not spend anything, at least not through their public official Facebook pages. A considerable number spend only symbolic amounts, while only a few invest at a meaningful scale. In many medium sized and smaller municipalities, online spending is negligible. This shows that digital communication is still perceived as a worthwhile investment primarily in urban areas.

2. Run off spending reshapes the entire campaign landscape.

Once the first round ends, the dynamics of communication change completely. Candidates who advance to a second round increase their intensity and often double their investment in online advertisements. Prishtina offers the clearest example. During the run off alone, the two candidates spent more than twenty one thousand euro, a figure that surpasses the combined total spent by many other municipalities across both rounds. In such cases, the run off effectively becomes the true campaign.

3. Major parties have become more sophisticated in digital campaign investment

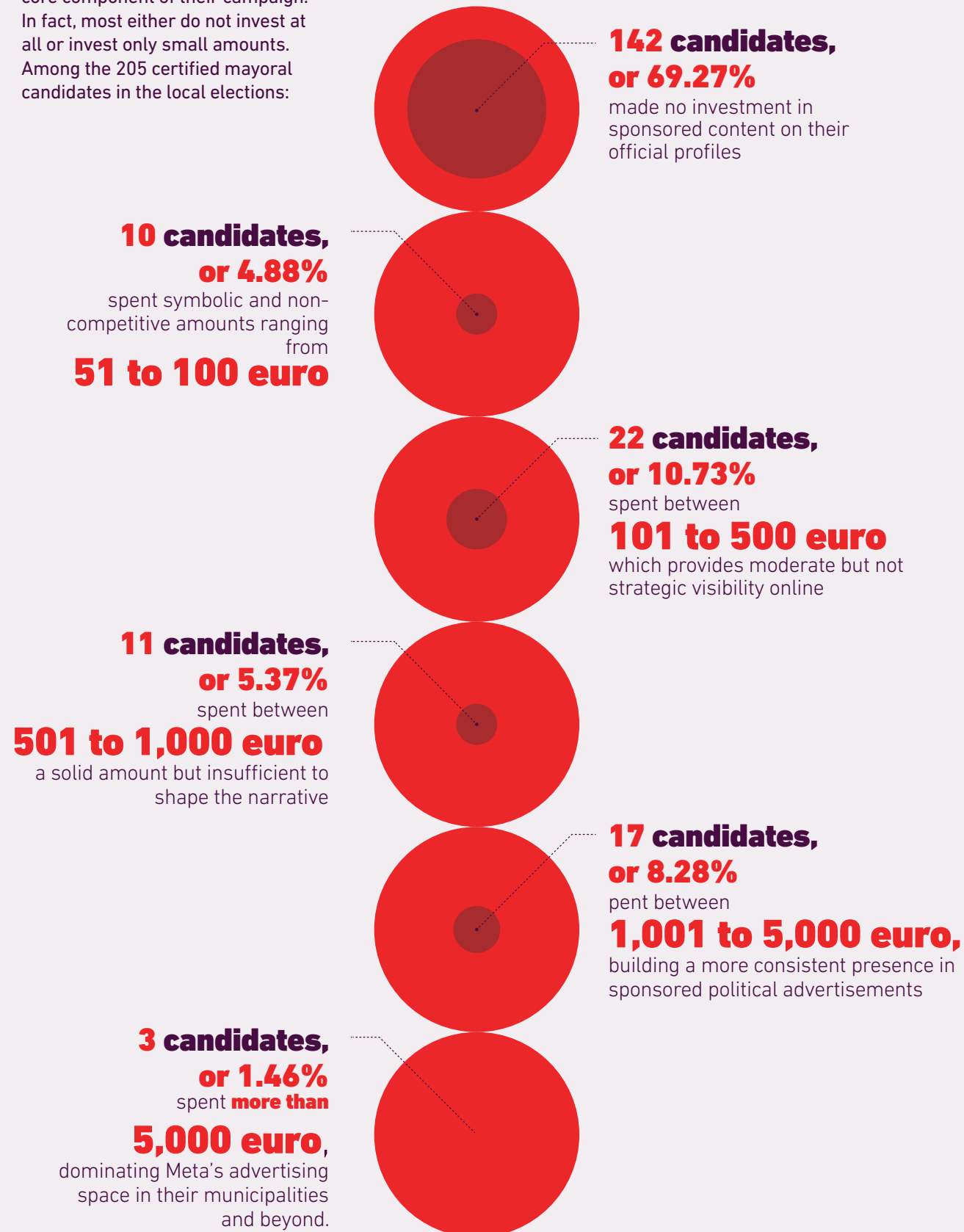
In the online space, LDK, LVV and PDK not only dominate overall spending but also appear as the only actors that develop systematic strategies. They identify key municipalities and invest accordingly, while contests with predictable outcomes receive little online attention.

Each party also displays a distinct approach to digital communication. LDK invests heavily in municipalities where it expects victory or where competition is tight. LVV shows broader but highly uneven spending among its candidates. PDK directs its resources towards municipalities with polarised contests or where it has a clear potential for victory.



Concentration of Spending – who engaged in digital campaigning and who did not

The data show that not all candidates consider social media a core component of their campaign. In fact, most either do not invest at all or invest only small amounts. Among the 205 certified mayoral candidates in the local elections:



This imbalance is particularly visible in urban municipalities such as Prishtina, Prizren and Gjilan, where social media is seen as an effective tool for influencing voters. In these centres, sponsored content is not used merely for symbolic presence but for shaping electoral out-

comes. By contrast, in peripheral municipalities, digital campaigning appears to be considered less valuable due to smaller electorates, closer personal ties between voters and candidates, and a stronger belief that traditional physical campaigning is more effective.

The dominant role of urban municipalities and of Prishtina in particular

No analysis of digital campaigning in Kosovo can bypass Prishtina. The capital is the central hub of online political communication. The findings show that candidates in Prishtina spent more than all other municipalities combined.

Several factors explain this. Prishtina has the largest and most diverse electorate in the country, the highest share of Facebook users, and a highly polarised political contest. Combined, these conditions pushed total spending by Prishtina's candidates to more than sixty five thousand euro, of which over 45 thousand were spent in the first round and more than twenty thousand more in the run off.

Weekly spending patterns – when candidates go “all-in”

Looking at the digital campaign through weekly spending rather than total sums reveals distinct patterns in how candidates planned, or improvised, their online messaging. Across the four weeks of the official first round campaign, a total of 89,568 euro were spent. Of this amount,

approximately 13,081 euro were spent in the first week, 12,992 euro in the second, 20,288 euro in the third, and a striking 43,207 euro in the fourth week. Almost half of all spending, or 48.2 percent, occurred in the final week.

For most candidates, digital campaigning was more reactive than strategic, an effort to capture attention at a critical moment. Among the sixty three candidates who were active in the digital space, thirty two had their highest spending in the final week. Fifteen reached their peak in the first week, five in the second and eleven in the third. The candidate with the highest spending in the first round was Uran Ismaili, who invested 19,207 euro. His approach is more aligned with modern campaigning, characterised by steady and high visibility throughout the period, with a surge toward the end.

A much smaller group of candidates attempted a balanced rhythm. One example is Alban Hyseni in Gjilan, who spent 1,383 euro in the first week, 881 euro in the second, 1,416 euro in the third and 1,423 euro in the fourth, for a total of 5,103 euro distributed fairly evenly. There are also opposite cases. Shpejtim Bulliqi in Podujeva concentrated around eighty percent of his spending in the first two weeks, placing emphasis on the start of the race rather than the final days.

The run off period produced the most extreme spending patterns. In Prishtina, Përparim Rama and Hajrulla Çeku together spent more than 21,000 euro, which alone exceeds the total spending of ninety percent of municipalities across the entire campaign. Çeku tripled his budget, increasing his spending from 3,730 to 8,424 euro. Prishtina illustrates what happens when the race is tight, the electorate is highly informed and the pressure to win is intense.



POLITICAL PARTIES AND THEIR WEIGHT IN THE DIGITAL CAMPAIGN

When all 205 candidates from the 38 municipalities are combined with run off spending, the total amount invested in paid advertisements on Facebook and Instagram reaches **114,091 euro**. However, when viewed through the lens of party affiliation, candidates from the three major parties, LDK, PDK and LVV, account for more than eighty five percent of all spending. PSD appears with a noticeable presence, while AAK and the remaining parties lag far behind.

1. LDK as the party with the highest overall spending

The total amount spent by LDK candidates stands at 36,500 euro. Of this, 23,293 euro were invested in the first round and 13,207 euro in the run off. This means that roughly 32% of all digital spending in the country during these elections comes from LDK candidates. The distribution, however, is far from even and is heavily dominated by Prishtina. LDK's candidate in the capital, Përparim Rama, spent more than 27,000 euro, including around 13,000 euro during the run off, which represents more than three quarters of the party's entire digital spending nationwide. Beyond Prishtina, several other LDK candidates made significant investments in social media:

- in Podujeva, where Ekrem Hyseni spent around two thousand euro, making him the highest investing candidate in that municipality;

- in Viti, where Mayor Sokol Haliti spent around six hundred euro in total.

2. PDK as the highest spender in the first round, with limited investment in the run off

If we focus only on the first round, PDK emerges as the party with the largest spending, reaching 32,499 euro, while in the second round it spent barely 500 euro. This significant difference is linked to several factors: the closure of several contests in the first round, the absence of run off races in municipalities where PDK had concentrated its efforts, and the party's shift toward physical campaigning in the second round.

The central figure is undoubtedly Uran Ismaili in Prishtina, who spent 19,207 euro during the first round alone. A single candidate thus accounts for more than half of PDK's nationwide spending. He is followed by Petrit Hajdari in Drenas with around 3,000 euro, and Gëzim Krasniqi in Malisheva with more than 1,000 euro.

3. LVV strong in the run off and more reserved in the first round

Vetëvendosje displays a different pattern from the other two major parties. In the first round, its candidates spent 16,538 euro, while during the run off they spent 11,603 euro, bringing the total to around 28,000 euro.



While LDK and PDK concentrated most of their investment in the first round, LVV treated the run off as its primary channel for sponsored content. In Prishtina, LVV's candidate Hajrulla Çeku spent only 3,730 euro in the first round but tripled this amount between the two rounds. Nearly two thirds of his total spending were made during the four week period leading up to the run off. With this volume, Hajrulla Çeku becomes the third highest investing candidate nationwide, after Përparim Rama and Uran Ismaili.

4. PSD few candidates but relatively large investments

Despite running with only three candidates, PSD reaches a spending level that positions it comfortably behind the three main parties. Among its candidates, two women stand out. Besa Shahini in Prishtina spent 4,529 euro, and Natyra Kuçi in Deçan spent more than 1,000 euro. Both appear among the highest investing candidates in the country, concentrating a significant part of their campaign strategy on social media.

5. AAK and other parties with sporadic presence and a stronger focus on physical campaigning

AAK candidates collectively spent around 4,000 euro, nearly all of which was used during the first round. Their spending is dispersed across several municipalities, but in none of them do AAK candidates appear among the top digital investors. The party's most visible candidate online is Bashkim Ramosaj in Deçan with more than 600 euro.

Other parties including BDP, NISMA, GUXO, VZHK and non-majority community parties spent much smaller, but occasionally strategic, amounts. Zafir Berisha from BDP in Prizren spent 2,385 euro, making him one of the highest spending candidates in the municipality. Albulena Balaj Halimaj from NISMA, with 1,239 euro, is among the top three women candidates nationwide in terms of digital investment.



32%
36,500€

of all digital spending in the country during these elections comes from **LDK**

First round

Second round
500 euro



32,499€

If we focus only on the first round, **PDK** emerges as the party with the largest spending



LVV displays a different pattern from the other two major parties. In the first round, its candidates spent

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Second round

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bringing the total to around **28,000 euro**.

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AAK and other parties with sporadic presence and a stronger focus on physical campaigning

AAK candidates collectively spent around

4,000 €



THE GENDER DIMENSION IN THE ONLINE CAMPAIGN

Of the 205 mayoral candidates, only around ten percent were women. Even within this small group, most did not make any use of paid social media advertising. Among all women candidates, only five invested any amount in digital campaigning. Together, these five candidates spent a total of 7,476 euro, entirely during the first round. By comparison, the remaining 185 male candidates spent more than one hundred thousand euro. Overall, ninety three point four percent of online campaign spending comes from men, while only six point six percent comes from women.

Within this unbalanced landscape, a few women stand out as clear exceptions:

→ **Besa Shahini from PSD in Prishtina** spent 4,529 euro, making her not only the highest spending woman candidate but also one of the highest spending candidates in the country overall.

→ **Natyra Kuçi from PSD in Deçan** spent 1,336 euro and led the sponsored campaign in her municipality, surpassing even the incumbent mayor.

→ **Albulena Balaj Halimaj from NISMA in Prizren** spent 1,239 euro, investing more than many male candidates in the same municipality.

When looking at spending by municipality, only five out of the thirty eight municipalities had at least one woman candidate who used paid advertising:

- Prishtina, with Besa Shahini, whose spending represents approximately seven percent of all candidate sponsorships in the municipality
- Deçan, with Natyra Kuçi, whose spending accounts for more than half, or fifty three percent, of all sponsored content purchased by candidates in the municipality
- Prizren, with Albulena Balaj Halimaj, whose spending represents around thirteen percent of all candidate sponsorships
- Drenas, with Egzona Tërdevci, whose spending represents around eight percent of the municipality's total sponsored content

Beyond these few municipalities, women candidates do not appear at all among digital campaign spenders across the rest of the country.



Besa Shahini
from PSD in
Prishtina

4.529€

Within this unbalanced landscape, a few women stand out as clear exceptions:



Natyra Kuçi
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1,336€



Albulena Balaj Halimaj
from NISMA
in Prizren

1,239€



Among all women candidates, **only five** invested any amount in digital campaigning.



MUNICIPALITIES AND THE MAP OF DIGITAL SPENDING

In every electoral campaign, municipalities function as more than administrative units. They are distinct battle-grounds, each with its own weight, rhythm and political logic. Some municipalities host serious competition on the Meta platform, while in others digital advertising barely exists.

Across the country, 88,675 euro were spent during the first round and 25,416 euro during the run off. Together, they form a total of 114,091 euro. This sum is far from evenly distributed. It is concentrated, often to an extreme degree, with only a handful of municipalities carrying most of the digital campaign burden.

Prishtina as more than half of the entire online campaign

It is no surprise that the capital dominates sponsored social media investment. However, the data show just how extensive this concentration is. A total of 63,507 euro, or around fifty six percent of all digital advertising and sponsorship spending in the country, comes from Prishtina alone.

Within Prishtina, the distribution is even more concentrated. Four candidates account for nearly all spending:



Within Prishtina, the distribution is even more concentrated. Four candidates account for nearly all spending:

Përparim Rama from LDK with

27,517€

(14,608+12,909)



Uran Ismaili from PDK with

19,207€



Hajrulla Çeku from LVV with

12,154€

(3,730+8,424)



Besa Shahini from PSD with

4,529€





Prizren and Gjilan as the second tier of digital campaigning

After Prishtina, only Prizren and Gjilan manage to build digital campaigns of meaningful scale. Prizren ranks second with 9,583 euro, followed by Gjilan with around 7,400 euro. Together with Prishtina, these three municipalities account for roughly seventy percent of all digital sponsorship spending by mayoral candidates in Kosovo.

Unlike Prishtina, where a very small group of candidates dominates, Prizren presents a more balanced distribution

- **Artan Abrashi** from LVV with 3,127 euro
- **Zafir Berisha** from BDP with 2,385 euro
- **Driton Selmanaj** from LDK with 1,953 euro
- **Albulena Balaj Halimaj** from NISMA with 1,239 euro
- **Besnik Krasniqi** from AAK with 779 euro

Prizren is the only municipality in the country where five different political entities invest relatively large amounts. This makes it the most pluralistic digital environment, where no single actor dominates, resulting in a more diverse and often more dynamic online campaign compared to other municipalities.

Gjilan, on the other hand, is the opposite of Prizren. With 7,400 euro in total spending, the municipality belongs to the group with high investment, but the internal distribution is strongly unequal. The overwhelming majority of spending comes from the LVV candidate, the incumbent mayor Alban Hyseni, whose investment accounts for more than eighty six percent of the municipal total. He

is followed by PDK's candidate Riad Rashiti with around seven hundred euro. Interestingly, LDK's candidate Arbër Ismajli, who eventually reached the run off, spent no money at all on sponsored content on Meta.

The "middle tier" municipalities

Below the main centres is a group of municipalities with moderate digital spending, ranging from two to four thousand euro. These municipalities use digital campaigning as part of the contest, but not as its core. They include:

- **Istog** with 3,361 euro
- **Drenas** with 3,197 euro
- **Podujeva** with 3,179 euro
- **Vushtrri** with 2,990 euro
- **Deçan** with 2,518 euro
- **Kamenica** with 2,164 euro
- **South Mitrovica** with 2,100 euro
- **Malisheva** with 2,041 euro

These municipalities show some interesting patterns. Istog displays a relatively balanced campaign, with four main candidates spending similar amounts. Drenas is the opposite, with Petrit Hajdari from PDK accounting for more than 90% of total spending. Vushtrri is an example where the run off boosted digital sponsorship. Sylejman Mehulli from LVV reached 1,752 euro, while the incumbent Ferit Idrizi from PDK approached 1,238 euro. In Kamenica, the dominant presence comes from PSD's



Qëndron Kastrati with 1,764 euro, while other candidates spent considerably less.

Municipalities with zero or minimal online campaigning

On the opposite end of the map are municipalities where paid Meta advertising is essentially nonexistent. Fourteen municipalities recorded zero digital spending from their candidates. These include Obiliq, Partesh, Novobërdë, Mitrovica e Veriut, Dragash, Mamushë, Ranillug, Leposaviq, Shtërpcë, Skenderaj, Klllokot, Klinë, Zubin Potok and Zveçan.

For municipalities with a Serb majority, this is expected, as their candidates generally do not use Meta as a campaign channel. However, several Albanian-majority municipalities also appear in this category, and their zero spending is telling. Campaigns in these areas continue to rely on traditional methods such as direct meetings and public gatherings, well outside the dynamics of modern digital targeting.

A slight step above zero are municipalities with symbolic spending between one hundred and four hundred euro, such as Hani i Elezit, Junik, Graçanicë and Suharekë. These municipalities had sporadic advertisements but lacked any consistent digital campaign strategy.





THIRD PARTY CAMPAIGNS AND THEIR SPENDING

During the analysis of paid advertising on social media, beyond the candidates and official electoral entities, a number of accounts appeared that do not present themselves as political actors but nonetheless spend considerable amounts on sponsored political content. Their identification was made exclusively through publicly available data from the Meta Ads Library, and only in cases where reported spending exceeded the minimum threshold of 100 euro, in line with the technical limitations of the platform.

In international practice, third party campaigning refers to political activity funded and disseminated by actors who are not candidates, not political parties and not official electoral entities, yet intervene in the electoral process through sponsored content, advertisements or other materials aimed at shaping public perception of candidates and the race. Under the current legal framework in Kosovo, these actors carry no financial reporting obligations and are not subject to the transparency standards required of political parties, even though their activity may exert direct influence during the campaign. In many countries, this phenomenon includes social media pages, online portals, informal groups or individuals who pay for political advertisements without being registered under any official campaign category.

Monitoring identified at least 17 pages that exceeded the 100 euro spending threshold during different phases of the campaign, both in the first round and in the run

off. Their combined spending reaches around 15,000 euro, which accounts for approximately 13% of all online spending recorded on the Meta platform during these local elections. Most of these advertisements were concentrated in municipalities with intense competition, particularly in Prishtina and Drenas, but also in Viti, Klinë and Shtime. In several cases, spending by these third party actors in a single municipality equalled or surpassed the spending of the candidates themselves, indicating that their financial influence is significant.

A notable pattern is the timing. Most of these pages were created shortly before the elections, published large amounts of content within a few days and several disappeared almost immediately after the first round.

Two main operational models appear among such Facebook pages. One group invests in promotional content supporting certain candidates or parties. Another group sponsors content targeting specific candidates with criticism, especially in municipalities with polarised races. Of the 17 pages analysed, thirteen focused primarily on negative campaigning against a particular candidate, four focused mainly on positive promotion, and one displayed a mild mixture of neutral content. The ratio is therefore thirteen to one (13:1) in favour of negative campaigning.

Most third party spending was directed against Përparim Rama. Several different pages sponsored critical



advertisements targeting him, making him the most frequently attacked candidate in this category. In parallel, a considerable share of spending was directed in favour of Uran Ismaili and the Democratic Party of Kosova, promoting positive narratives and reinforcing supportive messages during peak campaign periods.

A similar pattern emerged in another set of pages that focused almost exclusively on messaging against Ramiz Lladrovci. In some cases, the amounts spent by these third party actors exceeded the candidate's own spending on digital advertising.

Beyond these prominent examples, the monitoring identified sponsored content favouring candidates of LDK and LVV in certain areas, as well as critical messaging directed at candidates of PDK, AAK, LVV, LDK and NISMA, depending on the targeted audience of each page.

These findings make it clear that the campaign in Kosovo is no longer a contest conducted solely between candidates. A parallel campaign is being carried out by third parties whose influence is at times equal to, and in some cases greater than, that of the candidates themselves.





RECOMMENDATIONS

Political campaigning in Kosovo is unfolding across a landscape far broader than what the electoral legislation currently regulates. Formal candidates are only one part of the contest. Alongside them operate third party actors, pages created specifically for political attacks, hidden advertisers and campaign activity funded by individuals or groups whose identities remain unknown.

To help ensure a fair and balanced process, KDI offers the following recommendations as a minimum framework necessary to safeguard campaign integrity and equality among electoral competitors:

1. Regulating individual candidate spending as a distinct legal category

To preserve the principle of equal competition, there must be a clear legal requirement that every expense and every contribution received by a candidate, regardless of who makes the payment, is treated as part of that candidate's campaign financing and reported in a standardised format. Reporting should include digital advertisements paid by the candidate, contracts for consultants, design, video, photography, transport or events, spending from personal funds, individual donations or in kind contributions, as well as any expenses made by family members, personal staff, volunteers or other affiliated individuals.

2. Introducing a dedicated regulation for digital campaigning and transparency in online advertising

Political advertising on social media has become the most important component of electoral communication, even though this space remains largely unregulated. The Central Election Commission should therefore prepare and adopt a regulation defining online political advertising, requiring that all sponsored material clearly display the legal name of the paying entity and the identity of the page administrator, and mandating periodic reporting of digital spending under detailed categories. Equally important is that such regulation include mandatory institutional cooperation with platforms such as Meta, including automatic activation of the "political advertiser" category during electoral periods and the publication of spending data for all accounts circulating political advertisements within Kosovo.¹ The regulation should also include enforceable sanctions in cases of violations by political parties, candidates or third parties, including proportionate fines, temporary suspension of advertising or immediate referral to competent authorities.

3. Establishing the legal category of "electoral third parties" and imposing full transparency requirements

The electoral legislation should incorporate a distinct category for electoral third parties, which would be subject to registration, disclosure of financing and mandatory reporting of expenditures.

4. Improving the financial reporting system and standardising reporting formats

¹ This model is already applied in the European Union for political advertising during electoral periods, in line with the ERGA Guidelines.



To reflect the full reality of campaign financing, electoral reports must clearly distinguish between the expenditures of political parties, those of individual candidates and those made by supporting groups or third parties. The current reporting format does not capture this complexity and leaves room for misinterpretation of financial activity. Standardised reporting, mandatory inclusion of digital spending broken down into subcategories and details, and the requirement to provide supporting documentation for every financial declaration, including zero value declarations, would create substantial transparency and full accountability.

Furthermore, the Central Election Commission should make public the bank statements of all political parties, in line with personal data protection legislation, so that the public, civil society and the media can have easier access and greater capacity to verify and analyse the financial declarations of electoral entities.

5. Strengthening institutional cooperation for the oversight of digital campaigning

Cooperation between the Central Election Commission, specifically the Office for Registration, Certification and Financial Control of Political Entities, the Independent Media Commission and other relevant institutions should be formalised to ensure that monitoring of political advertisements and identification of unauthorised spending are effective and consistent, without institutional overlap. A joint mechanism that collects and analyses data in real time and identifies suspicious patterns would enable quicker and more accurate intervention during the electoral process, reducing the risk of undue influence on the campaign.





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