



EUROPEAN BOARD
FOR DIGITAL SERVICES



DSA Elections Toolkit for Digital Services Coordinators

Instruments, Best Practices,
and Lessons Learnt



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Executive Summary

The DSA Elections Toolkit for Digital Services Coordinators (DSCs) aims to guide the DSCs' contribution to the whole-of-society effort to protect the integrity of electoral processes in the European Union, with the ultimate goal of protecting EU citizens' fundamental rights, particularly the freedom of expression and information, the right to vote and the right to stand as a candidate.

The toolkit has been compiled by the European Board for Digital Services and the European Commission as part of a broader collective effort under the Digital Services Act (DSA)⁽¹⁾ to develop expertise and capabilities on systemic and emerging issues across the EU. Based on the Commission's Election Guidelines⁽²⁾ issued in April 2024, the toolkit summarises approaches, methods, and actions the DSCs have piloted to support more effective tailoring and better performance of mitigation measures by Very Large Online Platforms (VLOPs) and Very Large Online Search Engines (VLOSEs) in the electoral contexts of individual Member States. These mitigation measures concern a wide range of phenomena that can be detrimental to the integrity of electoral processes, such as the spread of illegal hate speech and online harassment of candidates or election workers, manipulation of public opinion, including through impersonation and other deceptive uses of AI generated content, or coordinated inauthentic behaviour linked to foreign information manipulation and interference (FIMI). For this reason, the toolkit is intended to dynamically evolve to reflect the changes in the threat environment and the continuous adaptation of mitigation practices.

Ensuring compliance with obligations to mitigate systemic risks for electoral processes is the exclusive competence of the Commission. Nevertheless, DSCs play an important role in sharing relevant information, developing knowledge and supporting cooperation between stakeholders at a national level. The role of DSCs is not to enforce these obligations, but to raise awareness among all election stakeholders about the DSA tools that can contribute to safeguarding election integrity.

In line with the Election Guidelines, the toolkit emphasises the importance of cooperation and information sharing between DSCs, national election authorities, and other relevant Member State authorities, VLOPs and VLOSEs and other relevant stakeholders, including civil society organisations, fact checkers, and researchers. Recommended practices and suggestions are based on examples of emerging good practice from across the Member States, organised along the four key focus areas for DSC involvement. For each area, a range of tools and activities that DSCs can implement to support the broader election integrity objectives and efforts are described and specific examples are provided. The tools and activities outlined are to be seen as different examples which DSCs can implement, but which should be adjusted, optimised and tailored to the national context. The activities should be undertaken with due consideration to the mandate of the DSCs, both under the DSA and under other national legislation. The activities should be prioritised according to available resources, national needs and the division of responsibilities between DSCs and other competent authorities.

(1) Regulation (EU) 2022/2065 of the European Parliament and of the Council of 19 October 2022 on a Single Market for Digital Services and amending Directive 2000/31/EC.

(2) Commission guidelines for providers of Very Large Online Platforms and Very Large Online Search Engines on the mitigation of systemic risks for electoral processes pursuant to Article 35(3) of Regulation (EU) 2022/2065.

- In the area of **stakeholder management**, the DSCs aim to establish and strengthen the connections to develop a better understanding of the roles and responsibilities of all stakeholders, the applicable legal framework for elections and the internal organisation of VLOPs and VLOSEs regarding each specific election in the Member State.
- With regard to **communication and media literacy**, DSCs' efforts are geared towards voters having access to accurate information about the election process and to materials aiming to increase their resilience against manipulation and to protecting the safety of candidates online.
- As concerns the **monitoring and analysis of election-related risks**, the DSCs' main focus is on facilitating research and data access, on leveraging all relevant DSA tools and on post-election reporting to report on activities, lessons learnt and experiences.
- For **incident response**, DSCs strive to support collective preparedness enabling effective coordinated responses to potential incidents around elections with consequences for the integrity of elections or public security through establishing incident protocols and networks, onboarding stakeholders to key escalation channels and stress-testing responses, for example by organising tabletop exercises.

Overall, this DSA Elections Toolkit aims to serve as a resource for DSCs and other stakeholders to support the integrity of electoral processes in the European Union, and to promote a safe and transparent online environment for democratic participation.

The toolkit pack also contains internal guidance pertaining to efficient information management, coordination, reporting, and evidence gathering to support the enforcement of the DSA, and is complemented by a growing set of case studies and methodologies that can serve as an inspiration and are intended to be replicated and further developed by the DSCs across the EU.

Abbreviations and Acronyms

Agcom	Autorità per le Garanzie nelle Comunicazioni (Italian Communications Regulatory Authority - DSC Italy)
Arcom	Regulatory Authority for Audiovisual and Digital Communication (DSC France)
BNetzA	Bundesnetzagentur für Elektrizität, Gas, Telekommunikation, Post und Eisenbahnen (Federal Network Agency for Electricity, Gas, Telecommunications, Post and Railways DSC Germany)
Board	European Board for Digital Services
CMS	Council for Media Services (DSC Slovakia)
CnaM	Coimisiún na Meán (Media Commission - DSC Ireland)
Commission	European Commission
DSA	Regulation (EU) 2022/2065 of the European Parliament and of the Council of 19 October 2022 on a Single Market for Digital Services and amending Directive 2000/31/EC (Digital Services Act)
DSC	Digital Services Coordinator
EDMO	European Digital Media Observatory
KommAustria	Austria Communications Authority (DSC Austria)
TTJA	Tarbijakaitse ja Tehnilise Järelevalve Amet (Consumer Protection and Technical Regulatory Authority DSC Estonia)
TTPA	Regulation 2024/900 of the European Parliament and of the Council of 13 March 2024 on the transparency and targeting of political advertising
VLOPs	Very Large Online Platforms
VLOSEs	Very Large Online Search Engines

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Introduction

In April 2024, in the run-up to the European elections, the European Commission issued Election Guidelines for the providers of Very Large Online Platforms (VLOPs) and Very Large Online Search Engines (VLOSEs), formulating specific recommendations on how they should mitigate systemic risks associated with electoral processes on their services, as mandated by Articles 34 and 35 of the Digital Services Act (DSA). The guidelines take into account the experience gained in implementing the commitments and measures contained in the Code of Practice on Disinformation, now officially integrated into the DSA framework, as well as the DSA election integrity readiness dialogues the Commission held with VLOPs and VLOSEs. They outline specific measures that VLOPs and VLOSEs should take to protect electoral integrity while respecting fundamental rights, focusing on integrity of the information environment, to ensure that their services do not become vectors for illegal content, misleading information, interference, and manipulation that could undermine elections in the European Union.

Throughout 2024, the Digital Services Coordinators (DSCs) and the Commission have become increasingly involved in election-related activities, both as part of the regulatory dialogue with VLOPs and VLOSEs and as part of election networks, discussions, and events in their Member States and at the EU level. These practices continue to evolve as DSCs step up their efforts in contributing to safeguarding the integrity of elections, leveraging the tools offered by the DSA and the Election Guidelines. This document takes stock of those experiences, presenting them in the form of a toolkit – to be used as a menu of optional and customisable activities – containing a description of approaches and methods DSCs can apply in the context of electoral processes in their Member States, throughout the election cycle. The recommended practices are illustrated by specific examples and complemented by more in-depth case studies and methodologies. *[NB: Specific examples, case studies, and methodologies are restricted for internal use only.]*

Given that DSCs play a pivotal role in ensuring the practical implementation of the DSA framework in the EU Member States and in maximising its positive societal impact, it is expected that the engagement of DSCs will continue to develop in the future. The Board therefore believes that it is essential to communicate about the DSCs involvement in mitigating systemic risks in the electoral process under the DSA in a way that fosters trust among voters and key stakeholders.

This document is a result of a collaborative effort under the auspices of Working Group 4 of the European Board for Digital Services (the Board), led by the working group Vice-Chair,⁽³⁾ collating input from both the DSCs and the Commission.

The toolkit represents a non-exhaustive, optional, customisable and scalable menu of possible actions that can be undertaken by DSCs in the context of future elections in any Member State. The tailoring, timing, and sequencing of specific activities should be adapted to the resources of DSCs and to the specific political and social context of the country. DSCs are also encouraged to implement activities other than those currently mentioned in the toolkit whenever relevant.

The toolkit aims to foster the collaboration and innovation required to address the challenges to electoral processes in the digital age. Its publication also aims to provide further transparency to collective efforts aimed at strengthening the resilience of democratic processes in the digital age under the DSA.

(3) CMS (SK), with contributions from AGCOM (IT), ARCOM (FR), BNetzA (DE), CnaM (IE), TTJA (EE).

Emerging Best Practice: DSC Tools/Activities For Election Integrity

The toolkit is structured around four key focus areas for DSC involvement, with a clearly defined DSC's role in the context of the broader election integrity ecosystem. Each focus area contains a specific set of tools/activities that DSCs can implement. The tools presented in this document may be prioritised, adjusted and further developed to address the specific needs of each Member State and each electoral process in focus.

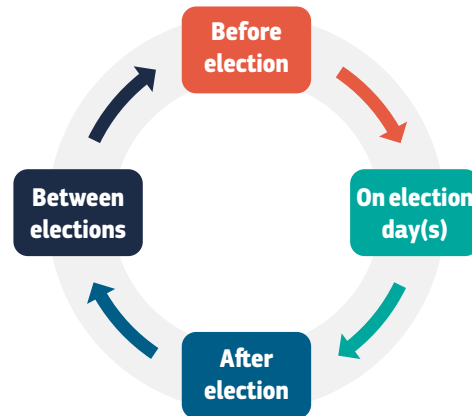
Focus area	DSC's role	Suggested Activities (Tools)
1. STAKEHOLDER MANAGEMENT	Build and maintain relationships with stakeholders to share knowledge and resources.	<ul style="list-style-type: none"> 1.1 Establishing connections with stakeholders 1.2 Engaging VLOPs and VLOSEs 1.3 Organising pre-election roundtables
2. COMMUNICATION AND MEDIA LITERACY	Engage with the public or specific audiences to inform, educate, and build trust.	<ul style="list-style-type: none"> 2.1 Facilitating the publication of information for voters 2.2 Publishing DSA-specific guidance and information for candidates 2.3 Promoting media literacy campaigns
3. MONITORING AND ANALYSIS OF ELECTION-RELATED RISKS	Facilitate public scrutiny and assessment of the performance of VLOPs and VLOSEs' mitigation measures.	<ul style="list-style-type: none"> 3.1 Facilitating research and data access possibilities 3.2 Facilitating monitoring of political advertising & ad libraries during electoral campaigns 3.3 Lessons learnt and post elections reporting
4. INCIDENT RESPONSE	Prepare for, react to, and aid in the resolution of critical issues as they occur.	<ul style="list-style-type: none"> 4.1 Establishing incident protocols and networks 4.2 Facilitating onboarding to key escalation channels 4.3 Organising tabletop exercises/stress tests 4.4 Responding to complaints

DSC engagement according to the phases of the election cycle

In the Election Guidelines, the Commission recommends to VLOPs and VLOSEs that, depending on the risk assessment for the particular election and taking into account the applicable electoral procedures, risk mitigation measures should be in place and functioning at least **one to six months before the electoral period**, and continue for at least **one month after the elections**.⁽⁴⁾

Mitigation efforts are also expected to be **intensified during the period prior to the date of elections**, taking into account national rules on elections, the heightened risk of threats, and the need to provide accurate information on voting procedures.

Similarly, a recommended time frame relative to the election cycle is indicated for each tool/activity, suggesting the optimal time for it to be carried out. Some activities are recommended for multiple time periods. For instance, media literacy campaigns are suggested before, after, and between elections, except on election days, when different activities may be prioritised.



DSCs planning their involvement are advised to take into account the anticipated threat level and the risk profile of each election, and to tailor their efforts to specific needs, context, and circumstances. Planning far enough in advance of the anticipated election allows for effective engagement, and it is advisable for DSCs' active involvement to continue after elections, through the announcement of official results, and, where applicable, until after the judicial review of the election has taken place in accordance with national electoral law. The period between elections can be used to further develop capacities and networks, process lessons learnt, update methodologies and support long term initiatives, such as media literacy.

The activities of the 'before election' period should be planned with significant key events in mind. These may vary depending on local or national electoral legislation and the specific circumstances of each election, but generally include the official announcement by the electoral authority of the election and its dates, the publication of candidate lists, the official start of the media campaign, and the silence period.

Snap elections

Early or snap elections present a particular challenge due to the limited time available for planning and preparation. The compressed timeline often leaves little room for comprehensive preparations, making it essential to prioritise activities strategically. DSCs, in cooperation with relevant stakeholders, should consider prioritising VLOPs' and VLOSEs' preparedness and focus on implementing critical activities to enhance incident response. From a practical point of view, the most crucial activities would concern coordination with relevant stakeholders (see the activity: [Establishing connections with stakeholders](#)) and setting up the response systems (see the activities: [Establishing incident protocols and networks](#), [Facilitating onboarding to key escalation channels](#), and [Responding to complaints](#))

⁽⁴⁾ Section 3.1, paragraph 24.

1. Stakeholder Management

The Election Guidelines emphasise the importance of cooperation, encouraging VLOPSs and VLOSEs to cooperate with competent national authorities in the area of elections, as well as regional and local authorities where appropriate, and with civil society, independent experts, representatives of various communities and other stakeholders. This fosters a comprehensive approach to safeguarding electoral integrity and enhances the effectiveness of their risk mitigation efforts.

These exchanges, in which the DSCs have an important role to play, aim at raising awareness among VLOPs and VLOSEs of the national election governance system and the role of various authorities, of applicable election legislation, authorities' own actions, and at establishing contact points enabling both regular and urgent exchanges of information that can inform VLOPs and VLOSEs risk assessments and mitigation measures.⁽⁵⁾

1.1 Establishing connections with stakeholders

Time period:

Before
election

Description: To be able to organise future meetings and events, facilitate assessment of the threat level and disinformation landscape by relevant stakeholders (which should inform future actions to be taken), and establish communication and escalation channels with relevant parties, it is advisable for DSCs to identify relevant stakeholders. These may include:

- state institutions and bodies involved in the elections, including competent electoral authorities, national defence and security organisations, police forces, relevant government departments (e.g. the Ministry of Internal Affairs or equivalent), entities involved in strategic communications, entities overseeing opinion polls, campaign and political financing institutions (such as national commissions);
- national election networks and various task forces to address threats to election integrity, such as foreign information manipulation and interference and cybersecurity;
- national focal points/members of the European Cooperation Network on Elections, the Rapid Alert System and other frameworks;
- relevant VLOPs and VLOSEs, other relevant online platforms and hosting service providers;
- election campaign teams and representatives from political parties;
- relevant researchers and civil society organisations, e.g. those involved in monitoring specific electoral processes, the relevant regional hub of the European Digital Media Observatory (EDMO)⁽⁶⁾ and international election observation missions;
- national representatives of the Commission's Media Literacy Expert Group, the European Regulators Group for Audiovisual Media Services (and its successor the European Board for Media Services). (see the activity: [Promoting media literacy campaigns](#)).

Mapping national institutions and their competencies is crucial for understanding their roles and levels of authority in addressing platform-related processes, such as issuing orders according to Article 9 and/or Article 10 DSA, escalating issues, or flagging content, with the possibility to establish a network of competent and empowered stakeholders/state bodies to respond effectively to any potential crisis situations (see the activities: [Establishing incident protocols and networks](#) and [Facilitating onboarding to key escalation channels](#)).

(5) Section 3.4, paragraph 46.

(6) For more information, see the EDMO webpage: <https://edmo.eu/about-us/edmo-hubs/>.

Establishing and maintaining relationships with the local research community has shown itself to be useful for encouraging researchers to carry out analysis and election-related monitoring. This includes regional EDMO hubs covering individual Member State territories with local expertise in detecting and analysing disinformation campaigns and monitoring the online ecosystem in this regard (see the activity: [Facilitating research and data access possibilities](#)).

In cases where networks already exist among state institutions, civil society organisations and researchers, it can be highly beneficial to leverage these established connections, reducing the time and resources needed to establish new partnerships. By making use of existing relationships, stakeholders can align efforts more effectively and amplify the impact of their initiatives while ensuring a cohesive approach to addressing common goals.

1.2 Engaging VLOPs and VLOSEs

Time period:

Before
election

Description: After elections are announced, the DSC may reach out to the relevant platforms to provide information about the upcoming elections, such as a timeline of key events, applicable rules or sharing any available information about planned initiatives regarding voter education and media literacy. This provides an opportunity to highlight any potential issues and challenges of the electoral campaign, to discuss gaps in the performance of specific mitigation measures recommended by the Election Guidelines and their capacity to perform in the local linguistic and electoral context, and how they can be addressed.

1.3 Organising pre-election roundtables

Time period:

Before
election

Description: As outlined in the DSA Election Guidelines, *'Digital Services Coordinators function as the single contact point with regard to all matters related to the application of Regulation (EU) 2022/2065 in a Member State, the Commission recommends that the Digital Services Coordinators are involved in the exchanges between providers of VLOPs and VLOSEs and competent national authorities on the electoral process'*. The main purpose of pre-election roundtables is to facilitate sharing information to support a safe electoral process and enable DSCs and stakeholders to engage with online platforms in order to understand election preparedness and online election threats and to assess online risks and mitigation measures (whether already in place or planned) pertaining to the electoral process in the relevant Member State. The roundtable heightens scrutiny, transparency and accountability.

The pre-election roundtable provides the opportunity to facilitate engagement and discussion between VLOPs and VLOSEs with the respective DSC, the Commission, competent national authorities (and, where appropriate, regional and local authorities) and relevant stakeholders, for example from academia and civil society. The roundtable provides a forum to address specific areas of concern, to gain better understanding of the national context and to allow for discussion and observations from relevant competent national authorities and experts in fields such as media literacy, cybersecurity or disinformation. The roundtable provides an opportunity for VLOPs and VLOSEs to further understand concerns and nuances at national level and for the platforms to outline the approaches and mitigation measures that are or will be in place.

2. Communication and Media Literacy

The Election Guidelines recommend that VLOPs and VLOSEs deploy measures to mitigate negative effects of foreign information manipulation and interference and the spread of misinformation and disinformation, including by automated means, on the exercise of voting rights, on the election turnout and outcome, and on participation in future elections. Many of these measures focus on providing users with reliable information about where and when to vote, as well as contextual and educational information, in order to increase their understanding of election-related content and help them recognise efforts to manipulate their electoral choice.⁽⁷⁾ They also emphasise the necessity to mitigate the negative effects of illegal hate speech or online harassment against political candidates or office holders, journalists, election workers or others involved in the electoral process.⁽⁸⁾

The DSC's efforts in this area should therefore focus on ensuring that relevant VLOPs and VLOSEs are aware of, and have access to, reliable information from official sources on the election process so that they can effectively, timely and intelligibly surface it on their services, along with content that fosters critical thinking and improves users' skills in recognising disinformation and manipulation techniques. Furthermore, DSCs could raise awareness about measures and tools available to candidates who are targeted by illegal hate speech, harassment, or impersonation efforts, including the use of deceptive manipulated media, for example manipulated images, voice recordings or deepfakes.

2.1 Facilitating the publication of information for voters

Time period: Before election On election day(s) After election

Description: Ensuring access to accurate and reliable information is critical to safeguard the integrity of the electoral process and to prevent the spread of disinformation about the election process. In general, VLOPs and VLOSEs conduct or deploy dedicated country-specific campaigns and features, such as information panels, banners, pop-ups, search interventions, links to websites of the electoral authorities, specific election information tabs, or a dedicated parts of the platform during the pre-election phase, and especially during the voting period, as well as after elections, particularly when official results are announced. DSCs could actively inform VLOPs and VLOSEs about the value of prominently promoting official sources of information (competent public bodies and local authorities in the case of local elections) regarding the elections, facilitating the contacts and information exchange between VLOPs, VLOSEs and competent authorities for this purpose when necessary.

2.2 Publishing DSA-specific guidance and information for candidates

Time period: Before election After election Between elections

Description: Depending on the specific local context, the DSC may consider engaging directly with election candidates to provide them with relevant information about the DSA in relation to the election campaign. This could include outlining the responsibilities of VLOPs and VLOSEs and the responsibilities of advertisers under the DSA, highlighting measures to ensure transparency, and

(7) Section 3.2.1, paragraph 27(a), (b), (c) and Section 3.3. paragraph 39(a), (b), (c), paragraph 40(b), (c) and (e).

(8) Section 1.1, paragraph 7.

emphasising the importance of mitigating disinformation during the campaign. Such interactions aim to promote a fair and informed digital environment throughout the electoral process. The DSC may also:

- Create election candidate information packs: these packs could include comprehensive information on:
 - how to use the Notice and Action mechanism to report specific items of information that they consider to be illegal;
 - how to file complaints and report content to platforms, and how to appeal decisions;
 - how to contact the DSC for guidance during the campaign;
 - DSA obligations of VLOPs and VLOSEs in the electoral context.
- If the DSC is also the designated competent authority for the TTPA or is working in collaboration with other designated authorities, they could consider developing or contributing to guidelines in this area. Such guidelines might aim to provide useful information about political advertising rules, including the legal requirements, best practices for compliance, and platform-specific rules on disseminating political content.

2.3 Promoting media literacy campaigns

Time period:

Before
election

After
election

Between
elections

Description: Promoting media literacy is an important, year-round initiative, both during and outside election periods. DSCs are encouraged to stay informed about active media literacy campaigns related to the elections and, where this is possible or necessary, to actively participate in the promotion of these efforts. These campaigns should empower voters to critically evaluate online information, navigate the complex media landscape, understand the influence of VLOPs and VLOSEs on public discourse, and make more informed decisions. Special attention and care should be dedicated in these campaigns to first-time voters, typically secondary school students - cooperation between academic researchers and teachers could lead to the creation of special courses for schools about critical thinking and politics. DSCs are also encouraged to promote the development of education techniques specific to the local context that pre-emptively build resilience against possible and expected disinformation narratives and manipulation techniques, for example through gamified interventions. Potential points of contact to reach out to on this include the national representative of the Commission's Media Literacy Expert Group and the national representative of the European Regulators Group for Audiovisual Media Services and its successor the European Board for Media Services. Regional EDMO hubs can also be an important partner, as they focus on producing content to support national and local media and public authorities in exposing harmful disinformation campaigns and organising media literacy activities at national or multinational level.

3. Monitoring and Analysis of Election-Related Risks

The Election Guidelines further elaborate on the transparency and data access provisions of the DSA⁽⁹⁾ by recommending that VLOPs and VLOSEs adopt additional measures to enable access to the data for studying risks related to electoral processes, including, where necessary, to data not available on the VLOPs' and VLOSEs' interfaces.⁽¹⁰⁾ The Guidelines suggest providing additional and tailor-made tools and features, including those necessary to study and scrutinise AI models, and providing additional data points in existing tools or specific datasets and expanding access to such tools or features.⁽¹¹⁾

The DSCs could focus on promoting and supporting the research community in leveraging all DSA transparency and data access tools to study risks to electoral processes and to encourage and facilitate ad hoc cooperation activities to contribute to the adjustments and further development of risk mitigation measures by VLOPs and VLOSEs around elections. Where internal capacities and resources allow, they may also conduct their own evaluation of the performance of specific mitigation measures during elections.

3.1 Facilitating research and data access possibilities

Time period: Before election On election day(s) After election Between elections

Description: To enable efficient monitoring of the online civic discourse and accurate detection of possible online threats, the multiple DSA transparency tools should be leveraged by a broad range of stakeholders. These include the annual publication of risks assessments (Article 34(1) (c) DSA) and audit reports (Article 37 DSA), transparency reports (Article 42 DSA), the Statement of reasons database (Article 24(5) DSA), ad libraries (Articles 26 and 39 DSA), and data access opportunities (Article 40 DSA). Additionally, possible cooperation projects between VLOPs and VLOSEs and researchers or NGOs could support ad hoc monitoring and analysis related to Member State elections, including the development of specific tools or dashboards.

Article 40 DSA provides access to VLOPs' and VLOSEs' data to researchers carrying out research on systemic risks, including any actual or foreseeable negative effects on civic discourse and electoral processes and conducting assessment of the adequacy, efficiency and impacts of the risk mitigation measures adopted by VLOPs and VLOSEs themselves. DSCs could make the research community members aware of this possibility for any election process by disseminating opportunities for access to both public and non-public data (the latter is reserved for vetted researchers upon DSCs' assessment). In particular, DSCs are required to establish a point of contact and provide information and support in the data access process, according to draft Article 6 of the Data Access Delegated Act.⁽¹²⁾ DSCs could promote opportunities to access data in various ways: on their website and/or through their social media channels, or through organising ad hoc meetings with interested researchers.

In addition, the reports from the Code of Practice on Disinformation provide additional information on all actions taken by platform signatories to implement their commitments and measures. The

⁽⁹⁾ Articles 39, 40 and 42 DSA.

⁽¹⁰⁾ Section 3.2.2., paragraph 29.

⁽¹¹⁾ Section 3.2.2., paragraph 30.

⁽¹²⁾ Draft Commission Delegated Regulation supplementing Regulation (EU) 2022/2065 of the European Parliament and of the Council by laying down the technical conditions and procedures under which providers of very large online platforms and of very large online search engines are to share data pursuant to Article 40 of Regulation (EU) 2022/2065

information pertains to key areas regarding countering disinformation online such as advertising demonetisation, political ads, integrity of services, user empowerment, collaboration with fact checkers, etc. Additionally, the Code contains a specific commitment for signatories to collaborate in times of elections and crisis, including by establishing a Rapid Response System (see the activity [Establishing incident protocols and networks](#)).

3.2 Facilitating monitoring of political advertising & performance of ad libraries during electoral campaigns

Time period:   

Description: Political advertisements and the transparency of their distribution on online platforms are critical elements addressed by specific provisions of the DSA (Articles 26 and 39 DSA) and the Transparency and Targeting of Political Advertising Regulation (TTPA) (Article 7 TTPA). These legal frameworks outline obligations for online services to provide clear information about political ads, including their funding, targeting criteria and reach through dedicated advertising repositories, also called ad libraries. Where capacities and competencies allow, DSCs may consider promoting and facilitating the monitoring efforts that leverage these repositories.

In addition, DSCs could participate in the identification and the periodic updating of a list of issues that could serve as a basis for determining which advertisements are 'liable and designed to influence the outcome of an election or referendum, voting behaviour or a legislative or regulatory process'.⁽¹³⁾ This set of activities could be performed collaboratively by research community representatives and civil society organisations in the view of any electoral process. The list could then be shared with stakeholders involved in the dissemination of political advertising (in particular political parties and candidates, political advertising publishers, VLOPs and VLOSEs) to aid in issue-based ads identification during elections.

3.3 Lessons learnt and post-election reporting

Time period:  

Description: In the post-election phase, the DSCs could issue post-election reports, providing an account of actions taken and lessons learnt.

To gather input from VLOPs and VLOSEs and assess activities and performance of their mitigation measures related to the elections, the DSCs may also consider designing and distributing questionnaires. The information gathered, complemented by and compared to input received from other stakeholders, may be further used by the DSCs in the post-election reporting.

Furthermore, the DSCs are encouraged to discuss lessons learnt together with the national authorities at both Member State level and EU level, making use of the Board and its working groups, in order to advance collective approaches, including through an eventual development of common methodologies to monitor and analyse election-related risks.

⁽¹³⁾ see the political advertising definition under Article 3 TTPA.

4. Incident Response

The Guidelines recommend that VLOPs and VLOSEs put in place effective mitigation measures to reduce the impact of incidents both on and off platforms during an electoral period which could have a significant impact on the election outcome or turnout. These measures should ensure that VLOPs and VLOSEs are able to react rapidly to any manipulation of their service that aims to undermine the electoral process and attempts to use disinformation and information manipulation to suppress or misguide voters, for example through manipulated images, voice recordings, or deepfakes of political candidates. ⁽¹⁴⁾

Activities of the DSC in this area could strive towards making relevant channels for cooperation and information exchange with VLOPs and VLOSEs function efficiently and include all relevant stakeholders, so as to enhance preparedness for high-impact events and emerging threats. When incidents occur, DSCs should contribute to a timely, efficient, and appropriate response while remaining within their remit and if possible, cooperate with other competent authorities. DSCs are encouraged to make use of and build upon the joint mechanisms and best practices for electoral resilience developed by the European Cooperation Network on Elections, the EU Rapid Alert System, the NIS Cooperation Group, as well as those under the Code of Practice on Disinformation.

4.1 Establishing incident protocols and networks

Time period: Before election On election day(s) After election Between elections

Description: As part of overall election preparation, DSCs are encouraged to establish basic protocols and procedures, enabling rapid responses to any unforeseen short-term developments.

On the **internal level** this includes setting up internal procedural rules and guidance for effective work distribution within the organisation of the DSC (tasks of employees, departments, HR management, etc.).

On the **external level** it includes setting up or joining networks connecting civil society organisations, academic institutions, state institutions and bodies that can be mobilised in the case of elections for monitoring and knowledge-sharing purposes. This could for example include allowing third parties to flag any issues to the relevant national authorities including DSCs, mapping the various possibilities to issue administrative and judicial orders (notably orders pursuant to Article 9 DSA) in the context of elections, using existing channels through which flags are submitted to platforms in the context of elections, or asking relevant third parties to document and preserve their interactions with platforms during the election.

The Code of Practice on Disinformation contains a specific commitment for signatories to collaborate in times of elections and crisis, including by establishing a Rapid Response System. This time-bound cooperation and communication framework allows non-platform signatories to report time-sensitive content that they deem to present threats to the integrity of the electoral process. It would be useful for DSCs to understand if the Rapid Response System is activated for their specific election, and which stakeholders are participating in it (VLOP and VLOSE signatories, EDMO hub, relevant civil society organisations and fact checkers).

⁽¹⁴⁾ Section 3.5., paragraph 51, 52, 53.

4.2 Facilitating onboarding to key escalation channels

Time period:

Before
election

On election
day(s)

After
election

Description: To ensure the ability of effective response to potential crises, DSCs may consider establishing escalation channels with relevant partners, such as other state institutions (see the activity: [Establishing connections with stakeholders](#)), and, if possible, also with relevant VLOPs and VLOSEs. This process involves identifying the key institutions, analysing their mandates, and assessing their capacity to engage effectively with platforms in line with legal and procedural frameworks. Clear mapping ensures better coordination, helps define responsibilities, and strengthens the overall effectiveness of platform-related actions. It also enables targeted capacity-building efforts to enhance the ability of institutions to manage their roles efficiently in the digital space.

4.3 Organising tabletop exercises/stress tests

Time period:

Before
election

Description: If the DSC determines that the circumstances are such that stakeholders might benefit from a stress test to ensure that the incident protocols, escalation channels and their overall cooperation are functioning well and to identify and address any gaps, a tabletop exercise might be considered in the period immediately preceding the election.

This participatory exercise provides the opportunity to relevant authorities, civil society, and the representatives of VLOPs and VLOSEs to conduct a joint analysis of the main threats to the integrity of a particular election and to enhance preparedness for collaborative responses to these threats.

The goal of such an exercise is to improve the understanding of the roles and responsibilities of each stakeholder, as well as the tools, resources, and capacities at the disposal of each organisation. The tabletop scenario can be based on incidents already experienced in the past or on anticipated threats, and should allow for a meaningful discussion at the necessary level of specificity to identify and troubleshoot any potential issue in the collective response.

The event itself can be scaled up or down depending on needs and available resources. It can be conducted as a standalone event of variable duration (anywhere between 2 hours and a whole day) or as a part of another event (for example a pre-election roundtable). The key requirement is its participatory nature, which should build on more general knowledge and presentation of policies, tools, and mitigation measures applicable to the election at hand and the anticipated threats.

4.4 Responding to complaints

Time period:

Before
election

On election
day(s)

After
election

Description: DSCs may consider setting up protocols and guidelines for complaint management before, during, and after elections, especially if practice shows an increase in volume or a change in nature of individual complaints in this period. During elections a timely reaction to such complaints might be especially important to protect the integrity of the election process. To expedite the processing of complaints, DSCs could publish a list of competent authorities, which may be relevant for the subject matter of complaints frequently received during electoral periods, along with an explanation of their competencies and areas of expertise.



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