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Standards for Integrity in Political Finance

A Global Policy Position

STANDARDS FOR INTEGRITY IN POLITICAL FINANCE

Money is essential for political participation. Political parties and candidates require financial and other resources to organise themselves, formulate their ideas and communicate them to the public. However, unchecked or opaque funding can allow affluent vested interests to exert undue, disproportionate, or even criminal influence on politics and policymaking. A lack of transparency and controls can lead to the capture of laws and resources by a powerful few, undermining the quality of government and eroding public trust in institutions.

Transparency International (TI) understands political finance as the ways in which political parties, candidates, non-contestants and other parties (referred here as 'third parties') to political processes raise and spend money for regular activities and election campaigns, and how that financing is regulated.¹

We envision political finance systems in which voters know who funds political parties and candidates, all funding represents the legitimate interests of voters, and no funding creates an undue advantage.

Our ambition is that the state apparatus remains neutral in elections and is subject to strict integrity standards, while also deploying public money to overcome the hurdles to participation in politics faced by marginalised groups.

We affirm that vibrant, pluralistic democracy requires political finance rules to be properly monitored and enforced.

The UN General Assembly has recognised that to “effectively address challenges (...) to prevent and combat corruption,” countries must “protect the integrity of the electoral process, promote its accountability to voters, transparency and impartiality in domestic electoral institutions and oversight mechanisms, and transparency in the funding of candidatures, political parties, and electoral campaigns.”²

However, these commitments have not been adequately translated into universal standards or international obligations.³ For that reason, we put forward these Standards for Integrity in Political Finance as a blueprint for reform.

The standards are a holistic set of measures that describe the effort needed to mitigate corruption risks and promote integrity of, at a minimum, the financing of national-level political parties and election campaigns.

A separate [discussion paper](#) expands upon the rationale for including the key issues in this policy position and puts forward best practices that go beyond these minimum standards. Both the discussion paper and the standards are informed by a series of regional and global consultations with TI national chapters, as well as experts from governments, international organisations, election observers, civil society, media and think tanks.

PRINCIPLE 1: TRANSPARENCY

The public has the right to know how money influences politics. Information about sources of funding and expenditures provides important context for making informed decisions at the ballot box and holding officials accountable. Transparency also deters illicit interests from seeking to buy political influence.

Since 2003, over 190 countries have committed to “enhance transparency in the funding of candidatures for elected public office and, where applicable, the funding of political parties,” through article 7.3 of the United Nations Convention Against Corruption and the political declaration of the United Nations Special session of the General Assembly against corruption 2021. Some countries, have also made similar commitments, based on regional treaties, such as the African Union Convention on Preventing and Combating Corruption, the Inter-American Democratic Charter of the Organization of American States, and the Convention on Standards of Democratic Election, Voting Rights and Freedoms in the Commonwealth of Independent States.⁴

However, relatively few countries are acting on that commitment. While over two thirds of countries require political parties and candidates to report on their campaign finances,⁵ opacity remains prevalent: an expert survey of 109 countries in 2021 found that one in three countries did not mandate the publication of financial reports, while only 36 published details of donations—such as their timing, amounts, and identification of donors—online. Even fewer, just 19, published that information with common identifiers.⁶

In the 21st Century, transparency must mean more than publication alone. Transparency is above all the capacity to reveal what the public deserves to know but remains concealed. Full disclosure requires independent agencies that are equipped to impartially verify not only that the rules are followed, but that the information disclosed is of good quality, accurate and timely. This is vital for allowing voters to hold their representatives accountable.

Countries that publish financial reports often miss key information, such as amounts, expenditures or the identity of donors, effectively rendering political finance donations anonymous. By 2023, anonymous donations were allowed in at least 64 countries worldwide.⁷ Transparency and accountability cannot be guaranteed without independent oversight bodies that are properly equipped to impartially verify and audit this information (see Principle 6).

Standards to Strengthen Transparency in Political Finance

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 the obligation for political parties, candidates and campaigns, as applicable, to report on their income, both in-kind and monetary, and including assets and loans, to the appropriate independent and impartial oversight body. Reporting must include the value, date, and source of each incoming transaction above a reasonable threshold.
- b) The legal framework must establish the 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 an 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 set at least on an annual basis for regular political party financial reports.
- d) The legal framework must set reporting deadlines for election campaign periods for political parties, candidates and campaigns, as applicable, including for prompt disclosure or the submission of interim

reports disclosing donation amounts and donor identities above a reasonable threshold 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 and user-friendly platform that provides searchable and accessible information in open data formats, so the electorate can take such information into account when casting their votes. 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, harassment, or reprisals, the legal framework should set a reasonable limit on the aggregate allowable amount of income to a political party, candidate, or campaign whose source is not publicly identified.

PRINCIPLE 2: CLEAN MONEY

Political funding must voice the legitimate interests of voters. To protect democracy from corruption and undue influence, political finance must originate from legitimate sources and use legal channels. Promoting clean money in elections means closing opportunities for covert, secretive or criminal actors – foreign or domestic – to gain undue political leverage over public discourse and election outcomes.

Several challenges hinder the realisation of this principle. By 2023, nearly half of 181 countries did not require political finance to flow through banking systems.⁸ Similarly, in-kind donations are not regulated in more than half of countries around the world.⁹ Unchecked cash and in-kind contributions can facilitate clientelism, patronage or offences such as trading in influence, vote buying or bribery. Similarly, organised crime groups that exploit people or illicitly extract natural resources can launder their ill-gotten gains to buy political influence and continue profiting with impunity.¹⁰

Anonymity allows illicit and illegal funds to enter politics in over 60 countries around the world. But even in countries where anonymous donations are banned, companies can funnel dark money into politics if there are no beneficial ownership disclosure requirements for donations made by legal entities, in potential circumvention of rules. Foreign interests can also circumvent bans and cloak their donations or other support – such as online advertising, advisory services,¹¹ or transfers of cryptocurrency assets – through foreign-controlled corporate vehicles, straw donors or third parties. Furthermore, third parties can also be used by other vested interests, domestic and foreign, to fake grassroots support or co-opt inauthentic groups.¹² To date, an overwhelming majority of countries do not regulate third-party financing.¹³

Standards to Promote Clean Money in Politics

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 authorities. Such suspicious transaction reports should be triggered by activity including, but not limited to, donations above 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 that do not seek to influence electoral outcomes.

2.4. Closing loopholes for 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 voters on regulatory and election outcomes. The framework must require platforms or publishers of advertisements to create and maintain for extended periods of time machine-readable registers of all adverts, detailing their sponsor, payer, authoriser, impressions, reach, duration period, and targeting criteria. These registers must also contain the aggregated amounts or value of the publishing services incurred by the political parties, candidates, campaigns, intermediaries or individuals who placed the ads.
- b) The legal framework must require online platforms to implement safeguards against the abuse of paid online communications by third parties to circumvent political finance rules. Safeguards include ad labelling, the disclosure requirements listed in 2.5.a, identity verification, geo-location-based rules to enforce country-specific regulations, and reporting mechanisms for suspicious or non-compliant ads.
- c) The legal framework must require detailed and itemised reporting of the expenditures incurred by political parties, candidates, their campaigns and other third parties legally authorised to prepare and place online ads, 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 of the donation. The recipient political party, candidate or campaign 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 the same 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, including foreign governments, foreign citizens, and foreign commercial legal entities. Support from international associations or democratic assistance organisations to political parties for the purposes of developing institutional capacities and political and civic education of members and citizens should be allowed during non-election periods.
- b) The legal framework must define thresholds and criteria of foreign ownership or control by which legal entities will be deemed as foreign and therefore prohibited from making donations.

PRINCIPLE 3: A LEVEL PLAYING FIELD

Access to money should not result in an undue advantage. A level playing field means that political parties and candidates have equitable opportunities to contest elections. Measures such as limits on donations and expenditure help ensure that moneyed interests do not gain undue influence over decision-making processes. Similarly, balancing private funding with public funding disbursed according to non-discriminatory, objective and reasonable criteria helps create an equitable political environment.

Reasonable limits on donations and expenditures can help make elections more competitive¹⁴ as they constrain the disproportionate influence of the affluent and abuse of office by incumbents. 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.¹⁵ Out of 181 countries, 100 do not impose limits on the value of donations to candidates. Ninety-six do not limit donations to political parties.¹⁶ Even where limits do exist, weak enforcement frequently undermines their effectiveness.

In many parts of the world, aspiring candidates are required to make large payments to obtain a nomination from their political party. These payments may be documented, but in some cases they are made directly to party bosses. Both practices expose aspirants to corruption.¹⁷

Public funding to parties and candidates, for example through subsidies and airtime allocations, can help level the playing field for underrepresented groups in society. When designed well, public funding schemes incentivise individuals to contribute to political parties through financial or other means, ensuring the minimum level of private funding required for a vibrant political contest.

On the other hand, when public funding lacks objective allocation criteria, is disbursed in an untimely manner, or is simply embezzled, it deepens inequities rather than levelling opportunities.¹⁸

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 direct (i.e. monetary) and indirect (e.g. subsidised media access) public political financing.
- 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.

PRINCIPLE 4: GENDER EQUALITY

Political funding must counter corrupt practices which keep women from elected positions. Women are the largest of several groups underrepresented in politics. Only 27 per cent of parliamentarians in single or lower houses in the world's parliaments are women.¹⁹ An increasing number of international standards and instruments also address the role of women in politics, including the International Covenant on Civil and Political Rights, which undertakes the equal right of men and women to the enjoyment of all civil and political rights; the Resolution 66/130 adopted by the UN General Assembly on 19 December 2011 on Women and Political Participation that calls on all States to "enhance the political participation of women;"²⁰ and the Convention on the Elimination of All Forms of Discrimination against Women (CEDAW) and its General Recommendation 23 which encourage political parties to adopt provide financial and other resources to overcome obstacles and "ensure that women have an equal opportunity (...) to be nominated as candidates for election."²¹

Ensuring that women have the same opportunities as men to access financial resources in nomination procedures and campaigns can help weaken the patronage and clientelist networks that keep women from elected positions.²² Equality between men and women in political finance also safeguards the correct use of emerging forms of public financing dedicated to support women politicians, contributing to more diverse political representation.

Women in politics are often forced to endure discrimination and entrenched stereotypes, as well as working environments and schedules that do not consider the caregiving responsibilities that women disproportionately undertake. They are also far more likely than men to experience multiple forms of harassment and threats both online and in person on the campaign trail. Furthermore, women face greater challenges than men in securing the resources needed to obtain a party nomination or run for office.²³ Inadequate flexibility and support (financial and otherwise) from political parties hinder, and sometimes actively prevent, them from standing as candidates.

Increasingly, public political financing schemes are tied to gender equality measures and are earmarked to support women who challenge advantaged incumbents, offering increased visibility and connections to financial networks. However, their effectiveness is often compromised by abuse or misappropriation.

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 ought to 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.

PRINCIPLE 5: STATE NEUTRALITY

Public offices and funds must be neutral in elections. State neutrality in elections and campaigns is critical for preventing the abuse of state resources, which is defined as, "the undue advantages obtained by certain parties

or candidates, through use of their official positions or connections to governmental institutions, to influence the outcome of elections.”²⁴

By 2023, in 35 out of 181 countries assessed by experts, no legislation prevented state resources from being exploited for electoral benefits.²⁵ Furthermore, even in countries where such legislation does exist, incumbents use state resources and powers for their own electoral benefit. Examples can range from the use of state vehicles, schools, offices or stadiums for political campaigns, to pressures on public sector employees.²⁶ The manipulation of public policies and budgets can range from discretionary spending to temporarily raise salaries, pensions or other benefits, to tax cuts or investments in infrastructure.²⁷

Many incumbents abuse security forces, law enforcement and other types of state force to intimidate or discourage candidates and activists from opposition parties. In recent years this has included arrests of multiple opposition candidates or the intimidation of voters.²⁸

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 other extenuating reasons, as well as 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) The personnel of law enforcement agencies, the prosecution, the judiciary and security forces should abstain from any action that has 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.

PRINCIPLE 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. Evidence suggests that where an oversight body is empowered to verify financial reports, there is greater availability of political finance data, regardless of the country's level of economic development.²⁹

Unfortunately, insufficient oversight and accountability are an issue across all regions. An expert assessment of 109 countries in 2021 found that only 55 have rules which empower a body or official to ensure the accurate and timely collection and publication of political finance data.³⁰

Furthermore, breaches of political finance legislation often go undetected due to a lack of coordination and cooperation between relevant agencies. Examples across Asia and the Pacific, Latin America and Africa indicate ample 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, prosecution and the judiciary.³¹

While most countries foresee some administrative sanctions for infringements, their enforcement record raises questions about their deterrent effect. For example, a recent study by Transparency International chapters in the Western Balkans and Türkiye found that despite having noted non-compliance, electoral management bodies in the region have failed to levy sanctions or have only imposed minimal sanctions.³²

Civil society, media, and other groups help create data platforms and solutions to monitor political finance rules. However, collaboration between political parties, oversight bodies and these groups remains weak or nominal in most countries, failing to achieve the full potential of whole-of-society approaches.

Standards to Promote Accountability

6.1. Establishing 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 concomitant 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 the decisions or work of the oversight bodies.

6.2. Promoting inter-agency cooperation

- a) Oversight bodies must proactively cooperate and exchange information with other relevant state institutions – such as electoral management bodies, supreme audit institutions, anti-corruption agencies, financial intelligence units, tax authorities, law enforcement agencies and the judiciary – in the investigation of potential breaches of political finance regulations.
- b) Oversight bodies must ensure that information exchange does not infringe upon 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 effective, proportionate and dissuasive, civil, administrative, disciplinary, and criminal sanctions for non-compliance with political financing regulations by political parties, candidates, campaigns and third parties.
- 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, media and 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 on-the-ground deployment of monitors. Oversight bodies must also introduce and uphold right to information practices, except where legitimate national security and privacy concerns apply.
- c) Oversight agencies should ensure that citizens, either individually or through civil society organizations, have the right to file complaints and initiate legal actions, with appropriate reporting channels in place.

In accordance with international standards and best practices, oversight bodies should guarantee confidential, safe, and secure reporting systems that are accessible and gender sensitive, to facilitate the timely reporting of political finance-related offences. The oversight bodies should provide support and protection against any unjustified treatment of any person who reports such offences, including whistleblowers, victims and their relatives.

ENDNOTES

- ¹ Based on: Ohman, M. (2014). Introduction to Political Finance. In International IDEA, *Funding of Political Parties and Election Campaigns: A Handbook on Political Finance* (p.2). Stockholm: International IDEA.
- ² United Nations General Assembly, A/RES/S-32/1: *Our common commitment to effectively addressing challenges and implementing measures to prevent and combat corruption and strengthen international cooperation*, <https://undocs.org/A/RES/S-32/1>
- ³ The only legally binding international standard applicable on political finance is Article 7.3 of the United Nations Convention Against Corruption, which only calls on State Parties to consider measures to enhance transparency in the funding of candidatures and political parties. See UNCAC Article 7.3 https://www.unodc.org/documents/brussels/UN_Convention_Against_Corruption.pdf
- ⁴ See African Union (2003), *African Union Convention on Preventing and Combating Corruption*, <https://au.int/en/treaties/african-union-convention-preventing-and-combating-corruption>; European Commission for Democracy Through Law (2007), *Convention on the Standards of Democratic Elections, Electoral Rights and Freedoms in the Member States of the Commonwealth of Independent States*, [https://www.venice.coe.int/webforms/documents/default.aspx?pdffile=CDL-EL\(2006\)031rev-e](https://www.venice.coe.int/webforms/documents/default.aspx?pdffile=CDL-EL(2006)031rev-e); Organization of American States (2001), *Inter-American Democratic Charter*, <https://www.oas.org/dil/2001%20Inter-American%20Democratic%20Charter.pdf>
- ⁵ Global Data Barometer (GDB). (2022). Political Integrity Module. Available at: <https://globaldatabarometer.org/open-data/>, [accessed July 2024].
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- ⁷ International IDEA. (n.d.). Political Finance Database. Available at: <https://www.idea.int/data-tools/data/political-finance-database>, [accessed July 2024].
- ⁸ 65 out of 109 countries surveyed in the Global Data Barometer did not regulate in-kind donations in 2021. See: Global Data Barometer (GDB). (n.d.). Political Integrity Module. Available at: <https://globaldatabarometer.org/open-data/>
- ⁹ Recent examples include the use of illicit funds stemming from drug trafficking or illegal natural resource exploitation in political finance across all regions, ranging from: (i) Indonesia see: Tempo.co.(2023, May 25). *Police Detect Possible Drug Money Funding General Election Candidates* <https://en.tempo.co/read/1729741/police-detect-possible-drug-money-funding-general-election-candidates>; Jong, H. N., (2023, March 21). *Indonesian campaigns getting money from illegal logging, mining, watchdog says*, <https://news.mongabay.com/2023/03/indonesian-campaigns-getting-money-from-illegal-logging-mining-watchdog-says>, to (ii) Bosnia and Herzegovina see: Sunday World (2024), *Kinahan Cartel partners in Bosnia planned to 'take over the state'*, <https://www.sundayworld.com/crime/world-crime/kinahan-cartel-partners-in-bosnia-planned-to-take-over-the-state/a870044694.html>; Sarajevo Times (2024), *Sky Correspondence from the "Black Tie 2" case: Influences on Politics and the NiP Party*, <https://sarajevoimes.com/sky-correspondence-from-the-black-tie-2-case-influences-on-politics-and-the-nip-party/>, and across (iv) Latin America see: [Political Finance and Organized Crime in Latin America \(brookings.edu\)](https://www.brookings.edu/research/political-finance-and-organized-crime-in-latin-america/).
- ¹⁰ Sample, K., & Valladares, J. (2022). *How OGP members can counter covert foreign political finance*. Open Government Partnership, National Democratic Institute, and Transparency International. Available at: <https://images.transparencycdn.org/images/FINAL-August-2022-NDI-OGP-TI-Covert-Foreign-Political-Finance-Brief.pdf>
- ¹¹ Transparency International & OSCE/ODHIR. (2021). *TRANSPARENCY CHECKLIST: The Role of Third Parties in Political Financing*.
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- ¹⁶ International IDEA. (n.d.). Political Finance Database. Available at: <https://www.idea.int/data-tools/data/political-finance-database>, [accessed July 2024].
- ¹⁷ At the time of drafting this discussion paper, we have not had the opportunity to systematise the evidence on costs of nominations put together in the series the Cost of Politics spearheaded by the Westminster Foundation for Democracy, available here: <https://www.costofpolitics.net/>
- ¹⁸ On the potential for public funding to deepen inequities if poorly implemented: <https://www.idea.int/sites/default/files/publications/funding-of-political-parties-and-election-campaigns.pdf> (See Chapter 2, which discusses the challenges and potential pitfalls of public funding systems); Regarding untimely distribution of funds: https://eeas.europa.eu/archives/docs/eueom/documents/mozambique-2019-final-report_en.pdf (The EU Election Observation Mission report on Mozambique's 2019 elections mentions late disbursement of public funds); On allocation benefiting established parties: <https://www.osce.org/files/f/documents/5/5/485387.pdf> (OSCE/ODHIR report on political finance systems, see section on "Allocation criteria"); For embezzlement and misappropriation risks: <https://www.u4.no/publications/political-finance-regulations-bridging-the-enforcement-gap>; On lacking criteria for disbursement: <https://www.oecd.org/governance/ethics/financing-democracy-9789264249455-en.htm> (OECD report on political finance, chapter 2 gives an overview of what allocation criteria are in place in different countries.)
- ¹⁹ UN Women (n.d), *Facts and figures: Women's leadership and political participation*, <https://www.unwomen.org/en/what-we-do/leadership-and-political-participation/facts-and-figures>, [accessed July 2024].
- ²⁰ United Nations General Assembly, A/RES/66/130: *Women and political participation, article 3*: <https://documents.un.org/doc/undoc/gen/n11/466/62/pdf/n1146662.pdf>.
- ²¹ UN Human Rights Office of the High Commissioner (1966), *International Covenant on Civil and Political Rights*, <https://www.ohchr.org/en/instruments-mechanisms/instruments/international-covenant-civil-and-political-rights>; UN Women (1997), *Convention on the Elimination of All Forms of Discrimination against Women*, <https://www.un.org/womenwatch/daw/cedaw/recommendations/recomm.htm>.
- ²² Camacho, G (2021) 'Corruption and gender equality A summary of existing research', Transparency International, U4 Anticorruption Resource Center, U4 HelpDesk Answer 2021:9, p. 5.
- ²³ UN Women (2024), *Why so few women are in political leadership, and five actions to boost women's political participation*, <https://www.unwomen.org/en/news-stories/explainer/2024/09/five-actions-to-boost-womens-political-participation>.
- ²⁴ OSCE/ODHIR. (2015) Handbook for the Observation of Campaign Finance, p.68 <https://www.osce.org/files/f/documents/f/8/135516.pdf>.
- ²⁵ International IDEA. (n.d.). Political Finance Database. Available at: <https://www.idea.int/data-tools/data/political-finance-database>, [accessed July 2024].
- ²⁶ In Kenya, incumbents often use state vehicles, public schools, government offices and even stadiums for political campaigns. See Africa Regional Consultation (20 March 2024, Lusaka, Zambia). In Serbia, the ODIHR Observation Mission of the December 2023 elections report noted that instances of pressure on public sector employees and misuse of public resources tilted the playing field, provided undue advantage to the ruling party and coalition, and blurred the line between state and the party, see OSCE/ODHIR. (2023). *Statement of Preliminary Findings and Conclusions*. Republic of Serbia – Early Parliamentary Elections, 17 December 2023. International Election Observation Mission. Available at: https://www.osce.org/files/f/documents/6/8/560650_0.pdf
- ²⁷ Examples from Argentina and Guatemala in the 2023 elections shows that the financial scale of abuse of incumbency (priced at several GDP points) may have impacted the economy at an aggregate macro level, rather than just tilting the playing field. In Guatemala, estimates of public budget transfers during the election period reached nearly USD 350 million⁹², and consisted of infrastructure, cash transfers, temporary domestic gas and utilities subsidies to households, to name just a few. In Argentina, the government infused fiscal measures worth an estimated US\$2.5 billion⁹³ in forms of VAT or income tax exemptions to different groups (pensions), other targeted cash transfers to different groups, rebates for domestic tourist travel and different sorts of handouts, among others. Sources: 92 Bran, S. (2023, August 3). ¿Cómo se están

ejecutando los recursos públicos en Guatemala? Plaza Publica. Available at: <https://www.plazapublica.com.gt/content/como-se-estan-ejecutando-los-recursos-publicos-en-guatemala> 93 Quiroga, A. (2023, September 29). La billetera del Estado: tras perder las elecciones, Sergio Massa vuelca \$ 2,2 billones al "Plan Platita". Clarin. Available at: https://www.clarin.com/economia/billetera-perder-elecciones-sergio-massa-vuelca-22-billones-planplatita_0_c5A1SzZQqH.html

²⁸ 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 pressure voters and candidates. The prosecution has launched an investigation, but so far there have not been any prosecutions or convictions. See Transparency International Georgia. (2022, July 22). *State resources at the service of the ruling party: Proven methods of vote buying and illegal mobilization of voters in Georgia*. Available at: <https://www.transparency.ge/en/post/state-resources-service-ruling-party-proven-methods-vote-buying-and-illegal-mobilization-voters>

²⁹ Valladares, J., & Vrushi, J. (2022, May 23). *Building a greater understanding of political integrity data infrastructures*. Global Data Barometer. Available at: <https://globaldatabarometer.org/2022/05/building-a-greater-understanding-of-political-integrity-data-infrastructures/>

³⁰ Global Data Barometer (GDB). (n.d.). Political Integrity Module. Available at: <https://globaldatabarometer.org/open-data/>, [accessed July 2024].

³¹ For example, in Zambia, the Financial Intelligence Centre (FIC) reports indicates that in campaign years there are rises in Suspicious Transaction Reports (STRs), and the Indonesian Financial Intelligence Unit issued findings that indicate that there has been illicit funding from illegal mining and logging entities as well as narcotics industries, however it cannot act or investigate further. For Indonesia see: Suspicious Transactions Allegedly from Crimes in Mining, the Environment and Gambling, <https://www.kompas.id/baca/english/2023/12/20/en-transaksi-janggal-dana-kampanye-berasal-dari-tambang-ilegal-kejahatan-lingkungan-dan-perjudian> In both cases, this information seems to be treated as cases of money-laundering or financial fraud, but there is no evidence of this information being referred to pursue potential breaches of political finance.

³² Vrushi, J. & Büchner, I. (2023). *Bringing the Receipts: Political finance transparency in the Western Balkans and Türkiye*. Transparency International. Available at: https://images.transparencycdn.org/images/2023_WorkingPaper_BringingTheReceipts_English.pdf