

# GUIDELINES FOR EDMO HUBS TO MONITOR AND COUNTER ELECTION-RELATED DISINFORMATION

by EDMO Taskforce for Elections and Crisis-Related Disinformation

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## Introduction

Disinformation represents a persistent challenge to democracies, becoming particularly visible during elections, when heightened political activity and media attention facilitate the rapid spread of misleading or false content.

Even if it is true that disinformation's most significant effects often result from sustained, low-intensity campaigns that develop over time, well beyond electoral cycles, high-intensity disinformation phenomena during the electoral campaigns can affect voters' perceptions, trust in institutions, and the integrity of the democratic process.

These guidelines aim to support EDMO HUBs in monitoring and countering election-related disinformation, providing them with a common baseline in these activities, and ensuring a coherent and coordinated approach by the entire EDMO network.

At the same time, they are intended as not strictly binding. EDMO HUBs retain flexibility to adapt their activities to the specific national contexts and operational realities of the elections they cover. Not all activities may be feasible or equally relevant in every situation. Moreover, HUBs that under their respective EU calls do not have the necessary resources to carry out all the activities envisaged in these Guidelines, are justified in departing from them.

If a EDMO HUB moves away from these Guidelines, for lack of resources or other reasons, it is recommended to:

- a) inform via email [EDMO.eu](mailto:EDMO.eu) about the issue and its motivations (e.g. shortage of resources; local context that prevents the use of the

Rapid Response System (RRS), or allows only a partial use; specific timing for snap elections; and so on) one month before the start of the preparatory activities or, if it is not possible because of the timing of the election, as soon as possible;

- b) in the same email inform about the alternative course of action that is the most respectful of the spirit and goals of these Guidelines, striving to reduce the deviation as much as possible.

Any deviation from these Guidelines by an EDMO HUB must not, per se, be used to assess the HUB's compliance with the obligations set out in the EU call governing that HUB. All obligations applicable to the HUBs stem exclusively from their respective EU calls. These Guidelines are intended to reinforce alignment and coordination, without creating any additional legally binding requirements for the HUBs.

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## **Preparatory activities**

The EDMO HUBs geographically competent for the election in question should start preparatory activities no later than two months before the date of the vote. In the case of snap elections called with less than two months' notice, preparatory activities should begin as soon as possible after the announcement of the vote.

Recommended preparatory activities are:

- 1) First internal meeting of the HUB consortium members

In the first meeting the following points should be dealt with:

- a) setting up the different teams and related workflows (e.g. who analyse the data, fact-check politicians' statements, and write in-depth analyses or recap reports, etc.);
  - b) drafting an editorial plan (what should be published, by whom, where and when) and identify potential partners among media for dissemination.
- 2) Secure access to relevant data (e.g. social media platforms' suspicious accounts or viral posts, known sources of disinformation,

etc.) and tools (e.g. AI-detection tools and pools of experts, social media listening tools, tools for real-time transcription of electoral debates across online platforms and TV channels, etc.).

- 3) Prepare internally for the use of the Rapid Response System (RRS) (see the dedicated section below) that will be activated four weeks before the vote and will be active until one week after the vote.
- 4) Contact traditional and new media to coordinate the dissemination of the editorial content when possible, and to create connections that could be useful during the last weeks of the electoral campaign (e.g. for interviews, ad hoc publications, etc.).
- 5) Set up a meeting with [EDMO.eu](https://edmo.eu) for alignment, to discuss the editorial plan (in particular the chances of cross-publication of content among the different EDMO websites, in different languages), the use of the RRS and any other meaningful activities related to the elections.
- 6) Create an internal file where all the activities carried out by the HUB are listed and summarized, in order to facilitate post-election activities (e.g. reporting).

*Reactive activities:*

*Important caveat: As EDMO, we neither encourage nor discourage these activities. It is entirely up to the HUBs to decide, in light of their local and specific circumstances, whether to engage in them. These Guidelines are intended as suggestions for HUBs that choose to carry out such activities, rather than as a recommendation to do so.*

- If EU institutions, National governments or other State institutions request a meeting, schedule it once preparatory activities have been completed, so the HUB will be able to provide clear and definitive information about what activities it will carry out, the timeline and all the other relevant details.
- Ensure transparency by providing information, even in summarized form, on the HUB's website about such meetings and their content.

- It is recommended to have a clear understanding of what the RRS is, how it works, what to expect from it, and the differences with other systems (in particular, the Rapid Alert Systems, or RAS: in the past there was some confusion about it and the RRS).
  - If sensible, advocacy efforts aimed at improving electoral legislation should be considered.
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## **Content production**

### ***(aside from RRS-related content)***

As soon as possible after the definition of the editorial plan, the EDMO HUBs geographically competent for the election in question should start publishing content about election-related disinformation.

It is recommended to agree on a common tag (e.g., “NameOfTheCountry+Election+Year”) for all published content related to elections, in order to improve its discoverability and SEO.

Recommended content, to be published on the HUB’s website in national languages and on [EDMO.eu](https://EDMO.eu) website in English:

- 1) At least one general preliminary analysis of the situation in the country, in terms of the disinformation landscape.
- 2) Periodic briefs/reports/newsletters/digests (weekly if possible, otherwise every two weeks) about the main characteristics of the detected disinformation (e.g. main disinformation narratives, FIMI, coordinated inauthentic behaviour, astroturfing, etc.).
- 3) Specific analysis (e.g. about specific issues like AI-generated disinformation, or specific FIMI operations detected, etc.).
- 4) After the vote (ideally within one or two weeks), a general analysis of what happened, from a disinformation perspective, during the electoral campaign, the election day/days, and immediately after.

*Other possible content:*

- More in-depth preliminary analyses of the situation in the country, from a disinformation perspective, in particular: country risk

assessment reports, maps of online political communities, assessment of communication strategies, public opinion polls, and policy briefs.

- After the vote, a general public report about what the HUB did to address election-related disinformation, lessons learned and best practices.

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## **Rapid Response System (RRS)**

EDMO HUBs have access to the Rapid Response System (RRS) under the Code of Practice on Disinformation (now the Code of Conduct). The following activities are recommended, with one important caveat: organizations within the HUB consortia should not be placed in a position where their use of the RRS could conflict with professional codes of conduct, guidelines, or similar obligations. For example, a fact-checking organization should not be required to submit notifications concerning issues that have not already been publicly addressed in its published articles. It is recommended that potential issues of this nature be taken into account by organizations and consortia when evaluating future EU calls for the renewal or establishment of EDMO HUBs.

### **Preparatory activities**

- 1) Identify within the HUB a single entity (person or team) responsible for the use of the RRS, that will use a dedicated institutional email address, and the relative support team (ideally minimum three persons, with different expertise, e.g. platforms' policies, disinformation research methodology, fact-checking, national disinformation landscape, etc.).
- 2) Create an institutional email address to be used by the HUB for the RRS (e.g. nameoftheHUB@edmo.eu) that shields the identity of the individuals and organisations that are members of the HUB.

- 3) Set up a meeting with [EDMO.eu](https://edmo.eu) for alignment and mentoring.
- 4) Following the meeting with [EDMO.eu](https://edmo.eu), set up meetings with the Commission and the social media platforms' representatives for the onboarding of the entity (person or team) responsible for using the RRS across the different tools it encompasses.
- 5) Publish a statement on the HUB website announcing that the HUB will participate in the RRS, explaining what it is and what it is not (+link to the [Transparency Centre dedicated page](#)). This statement will be published in English on [EDMO.eu](https://edmo.eu) website as well.

### **Use of the RRS**

- 1) Notifications should be sent via the RRS to the relevant platform, shared in aggregate via email with the entire Code of Practice Taskforce (including the relevant team within the Commission's DG CNECT), and published on the HUB website (see point 6).
- 2) Notifications sent via the RRS to platforms should use neutral language, and should not contain (neither in attachments, forwarded messages etc.) names of individuals or organisations that are members of the HUB. The name of the HUB is the shield that protects those identities from potential harassment (e.g. after the publication of reports by foreign States).
- 3) Without prejudice to the platforms' responsibility to decide how to act on the notifications, HUBs should indicate the reason for reporting specific content or accounts without prompting any specific action by platforms.
- 4) The RRS should be used to report time-sensitive content or accounts that may pose threats to the integrity of the electoral process. This means not only disinformation about the electoral process itself (e.g. tampered ballots, dead people voting, postal voting fraud etc.) but also about issues that are topics of political confrontation before the vote (e.g. economy, migration, foreign policy, social issues, etc.).

Based on previous experiences, to provide a non-exhaustive list of examples, the following have been reported via the RRS:

- a) demonstrably false content circulating on relevant platforms (signatories of the Code of Practice);
- b) political advertisement not labeled as such;
- c) AI-generated content that is not labeled as such;
- d) Networks of accounts that engage in coordinated inauthentic behaviour;
- e) Networks of fake accounts;

Important caveat: in the notifications it is possible to use content published by entities that are not part of the HUBs consortium, e.g. to prove that the content notified is demonstrably false, but the responsibility still lies on the HUB, that should then check the reliability of the external content before using it in the RRS.

- 5) Do not use the RRS for sending notifications about politicians' statements, even if demonstrably false. It is EDMO's position that, for transparency and accountability reasons, this kind of disinformation should be addressed publicly by other politicians, journalists, fact-checkers, and so on. Not by platforms.

This does not mean that content posted by politicians is per se excluded from the scope of the RRS. It can be an appropriate channel to highlight, for example, unlabeled and deceptive AI-generated content, or political advertisement, posted by politicians' or political parties' accounts. The exemption applies only to actual public statements made by politicians.

Exceptional situations should be discussed with the whole EDMO Taskforce.

- 6) Publish on the HUB website a page listing all notifications sent through the RRS. This webpage will also be published in English on the EDMO.eu website.

*NB. This recommendation concerns the notifications, not the content of the notifications. Therefore, it is not necessary to list all the content/accounts subject to a notification; it is sufficient to explain what the notification was about and why it covered a range of content/accounts.*

## **Ex post activities**

- 1) Publish on the HUB website an ex post analysis of the RRS performance (how many notifications sent, to whom, how many received feedback from the platforms and what kind of feedback, etc.). This analysis will be published in English on [EDMO.eu](https://edmo.eu) website as well.