



Federal Foreign Office



INTERNATIONAL WORKSHOP

CIVIL SOCIETY AND THE ACCURACY OF VOTER REGISTERS:

INTERNATIONAL EXCHANGE
OF EXPERIENCE AND JOINT
RECOMMENDATIONS





UKRAINE

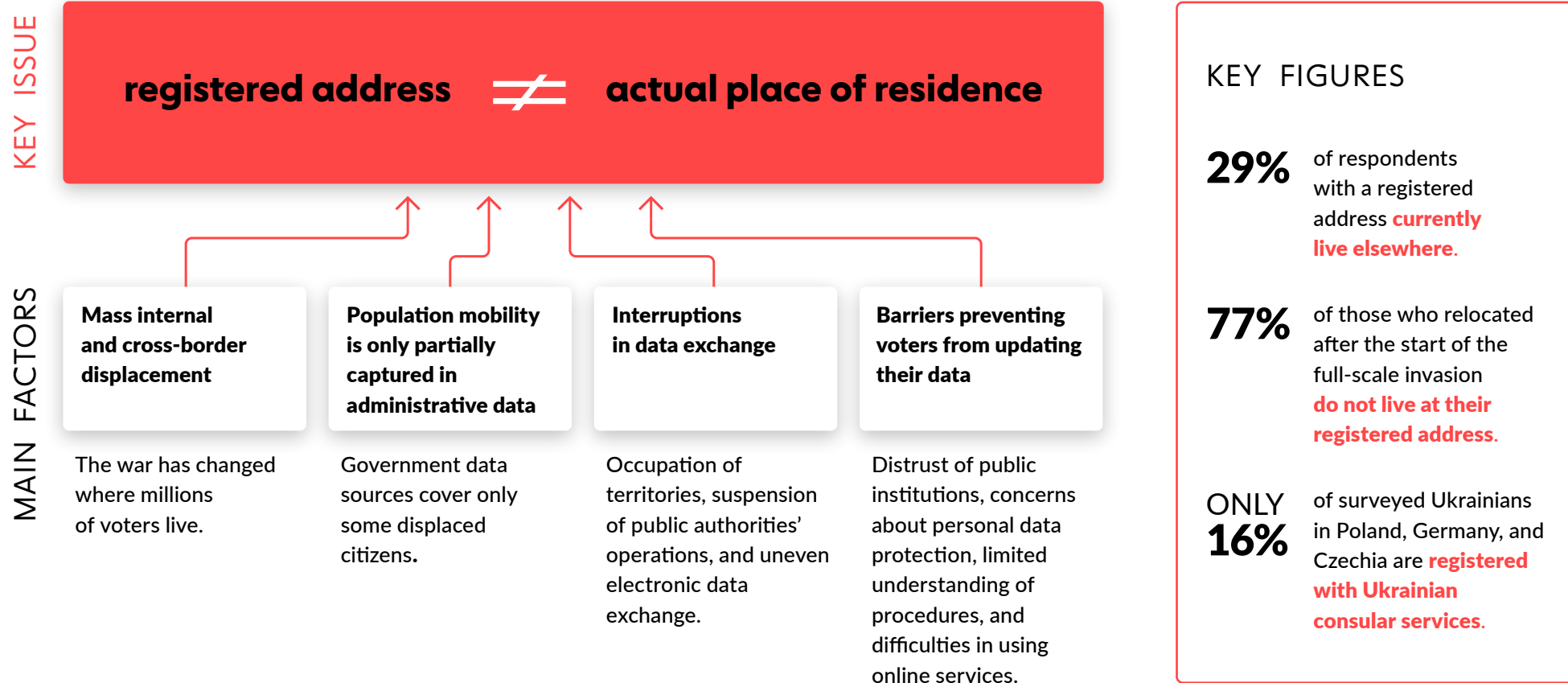
STATE VOTER REGISTER (SVR): DATA QUALITY, VERIFICATION AND COOPERATION

Dmytro Bashtovyi

Analyst,
Civil Network OPORA



FACTORS WITH THE GREATEST IMPACT ON THE ACCURACY AND CURRENCY OF STATE VOTER REGISTER DATA



INACCURATE VOTER LISTS CAN IMPEDE THE EXERCISE OF THE RIGHT TO VOTE

COMMON PROBLEMS

- comission of an eligible voter from the voter list
- incorrect personal data
- assignment to the wrong polling station

11,387 court decisions concerning corrections to voter lists were issued in Ukraine during the 2019 election campaigns.

OPERATIONAL CONSEQUENCES

- inaccurate estimates of the number of voters in particular areas and complications in applying the open-list electoral system
- uneven workloads across polling stations, election commissions, and voter register bodies
- inadequate planning of electoral infrastructure, ballot papers, personnel, and other resources

In Kherson, the State Voter Register contains approximately **232,000 voters**, compared with an estimated **67,000 voters currently present** in the city.

RISKS TO ELECTORAL INTEGRITY AND TRUST

- manipulation narratives concerning outdated records and the number of absent voters
- possible attempts to exploit inaccuracies in voter lists
- discrediting of the electoral process
- declining trust in the State Voter Register, voter lists, and election results

During the local elections, more than **19% of voters** in one community in the Odesa region sought to change their place of voting.

VERIFICATION OF THE STATE VOTER REGISTER AND VOTER LISTS



STATE-LED UPDATING AND VERIFICATION

in operation

changes proposed

Existing mechanism:

- periodic updates and centralized electronic data exchange
- automated matching of records and follow-up on discrepancies

Proposed changes:

- broadening the range of data sources and the SVR's access to government information systems
- strengthening data validation and centralized verification
- wider use of unique identifiers



VERIFICATION BY VOTERS

in operation

expansion under consideration

Existing mechanism:

- the Voter's Personal Account and applications to a voter register maintenance body
- during elections, reviewing the preliminary voter list
- judicial protection of electoral rights

Changes under consideration:

- expanding digital channels of interaction
- simplifying procedures and documentary requirements
- revising the deadlines for submitting and reviewing applications



PUBLIC OVERSIGHT BY POLITICAL PARTIES

in operation

effectiveness needs assessment

How it works:

- during an election process, representatives of parliamentary political parties have read-only access to SVR data
- only handwritten extracts may be made
- a party may request verification of identified discrepancies
- the mechanism's practical effectiveness needs to be assessed

COMPREHENSIVE SVR AUDIT

requires a legal framework

the model remains to be defined

EUROPEAN COMMISSION

The 2025 Ukraine Report identified auditing and updating the State Voter Register as a pressing priority.

COOPERATION ON THE SVR: EXISTING FORMATS AND A DEDICATED THEMATIC WORKSTREAM

PARLIAMENTARY WORKING GROUP

On elections during a special period
and/or post-war elections

- brings together Parliament, the Central Election Commission, public authorities, civil society, and experts
- works through thematic subgroups
- currently has no dedicated SVR workstream

WHAT SHOULD BE STRENGTHENED?

NEXT STEP

A dedicated SVR
workstream within
the development
of legislative
and operational
solutions.

OTHER FORMS OF COOPERATION

- research
- expert consultations
- strategic sessions
- joint projects

These create opportunities to discuss
specific issues affecting the accuracy
and currency of SVR data.

UKRAINE'S COMPREHENSIVE APPROACH TO ASSESSING SVR DATA QUALITY

HOW CIVIL SOCIETY CAN ASSESS THE QUALITY OF SVR DATA WITHOUT ACCESS TO PERSONAL DATA



Measure the scale

Sociological surveys
in Ukraine and abroad

- alignment between actual and registered places of residence
- displacement experience and intentions to return
- awareness of the SVR, willingness to update data, and the main barriers

VALUE

Estimates the scale of the problem and identifies voter groups for targeted communication campaigns.



Map displacement patterns

Aggregated and anonymized data
from a mobile network operator

- estimating actual population concentrations and movement
- comparison with official indicators
- identifying areas with the largest potential discrepancies

VALUE

Provides additional evidence for planning.



Explain the causes

Interviews, focus groups, and
analysis of existing practices

- interviews with institutions responsible for maintaining the Register and supplying it with data
- focus groups examining voter motivations and perceptions of the Register's online services
- analysis of legislation and administrative and judicial practice

VALUE

Identifies the stages at which problems arise and whether they are legal, institutional, technical, or procedural.



Test procedures in practice

Landing page, experiment,
and service testing

- the #НевбпСебеУПєєтпї / #CheckYourselfInTheRegister campaign and landing page
- collection of voter feedback after checking their data
- an experiment on changing electoral address from abroad

VALUE

Reveals practical barriers that cannot always be identified through legal or data analysis alone.

Comprehensive
assessment



Evidence-based
recommendations



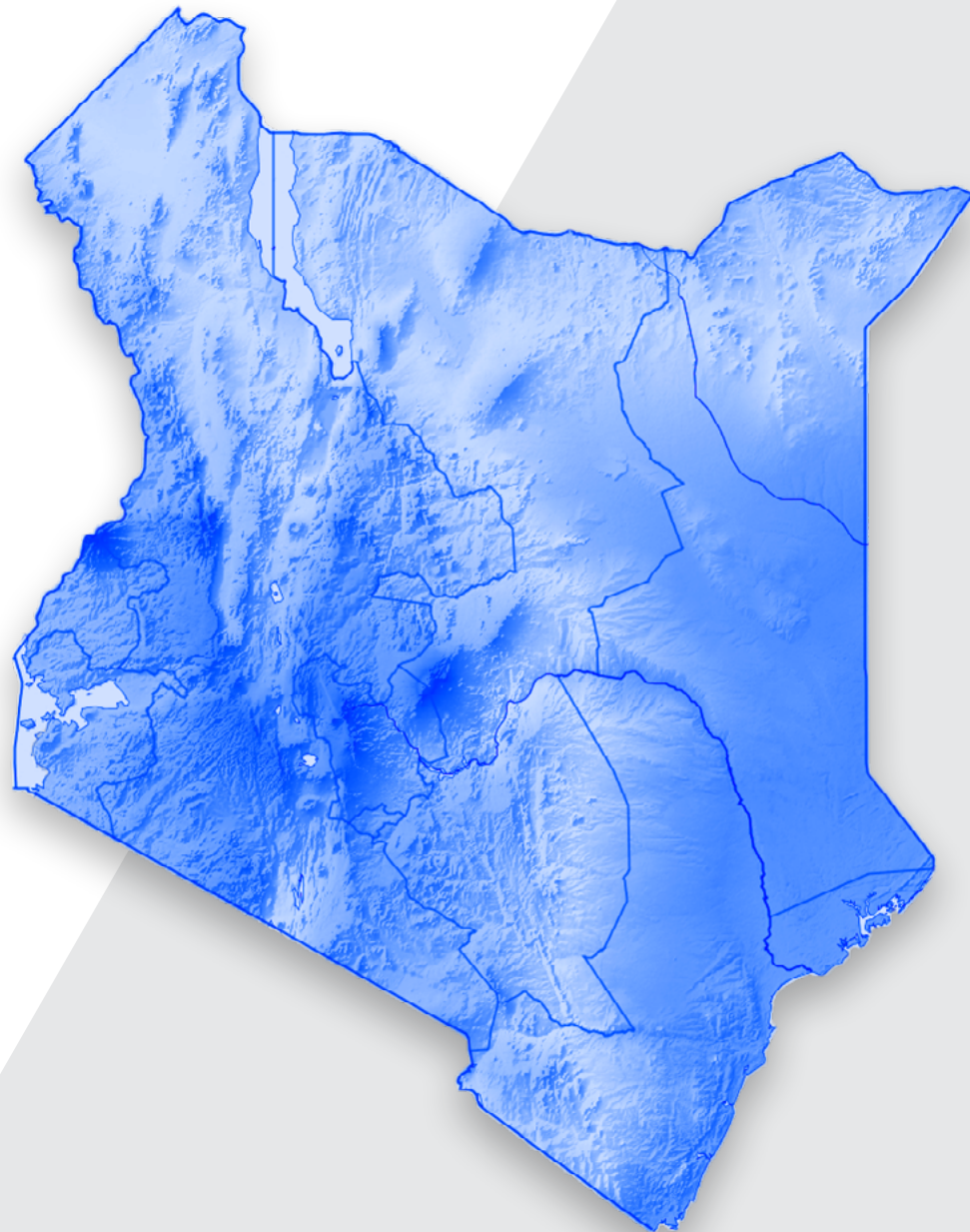
Dialogue with the
Central Election Commission

KENYA

VOTER REGISTER INTEGRITY: FROM DATA QUALITY TO PUBLIC TRUST

Eustace Kinyua

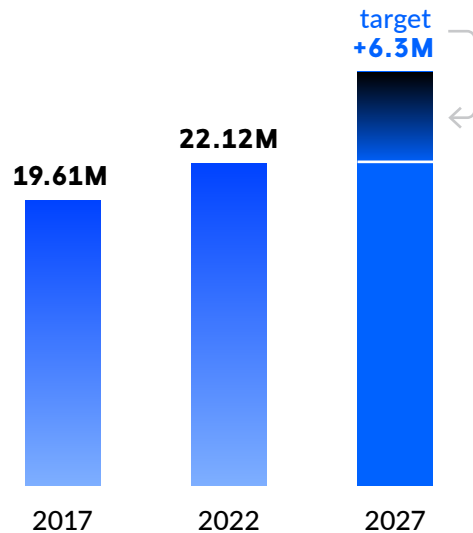
Electoral Processes Officer,
ELOG



SECURING KENYA'S VOTER REGISTER

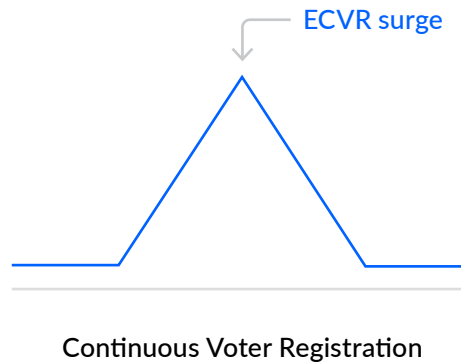
MAIN GOAL

From quantity to quality
in voter registration.



THE CORE CHALLENGE

How does a rapidly
expanding register remain
accurate, complete, current
and trusted?



KEY MESSAGE

As the register
expands, quality
must grow with
quantity.

WHERE REGISTER INTEGRITY BREAKS DOWN

Every eligible citizen should be able to vote —
and every eligible citizen should be registered only once.



EXCLUSION ERRORS

- eligible voters missing
- incorrect particulars
- wrong polling locations

HUMAN RISK

Direct disenfranchisement



INCLUSION ERRORS

- duplicate records
- ineligible records
- deceased persons remaining on the roll

SYSTEM RISK

Erosion of public confidence



Data capture

Clerical errors at registration



Duplicates

169,646 identified by ELOG



Deceased voters

Weak matching with civil records



Outdated data

Names, DOBs, transfers & locations

169,646

duplicate ID / passport
records identified in ELOG's
2017 assessment

ELOG'S INDEPENDENT AUDIT: VERIFY THE DATABASE AND THE VOTER

CITIZENS' INDEPENDENT AUDIT ON THE QUALITY OF THE 2017 REGISTER OF VOTERS

19,611,423
electronic
voter records

Logical computer tests for duplicates, missing fields, age / DOB anomalies and internal consistency.

2,280
citizens sampled
across all
47 counties

People-to-List field assessment to test whether eligible citizens were correctly reflected in the official roll.

HYBRID INDEPENDENT AUDIT

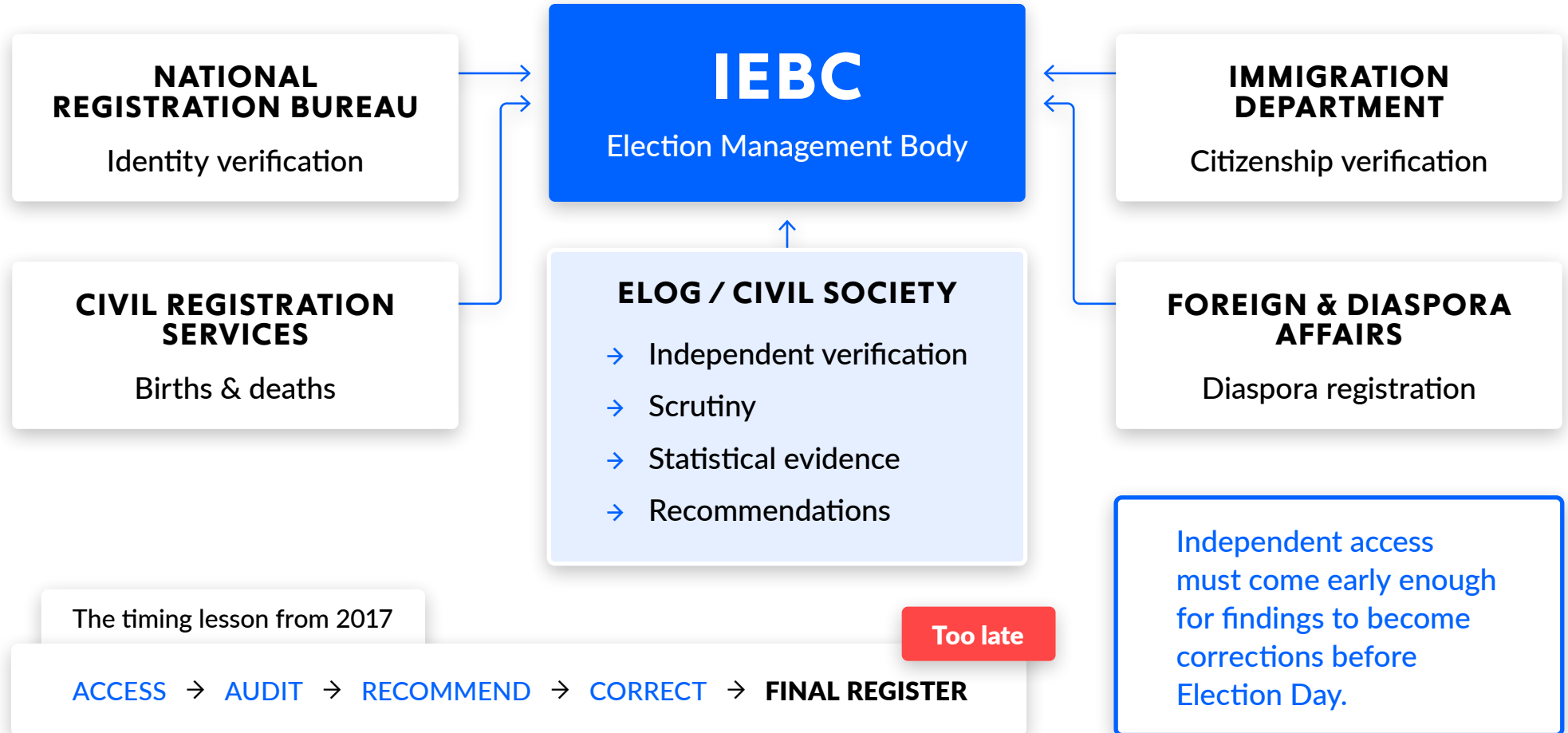
95% confidence level
±2% margin of error



Database testing finds systemic anomalies.

Field verification finds citizens the database may have missed.

INTEGRITY REQUIRES AN ECOSYSTEM, NOT JUST AN EMB



INTEGRITY REQUIRES AN ECOSYSTEM, NOT JUST AN EMB

A PRACTICAL FRAMEWORK FOR VOTER-REGISTER INTEGRITY

1

CONTINUOUS REGISTRATION

Maintain the register throughout the electoral cycle.

2

VALIDATE AT ENTRY

Stop errors and duplicates before they enter the register.

3

CONNECT STATE DATA

Link identity, births, deaths and citizenship data.

4

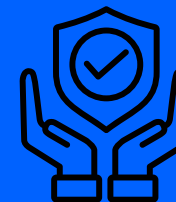
AUDIT TWO WAYS

Test the database and independently verify citizens.

5

INVOLVE CSO EARLY

Allow enough time for findings to become corrections.



A credible register is not simply one that contains many voters. It is one that citizens, electoral authorities and independent stakeholders can verify and trust.

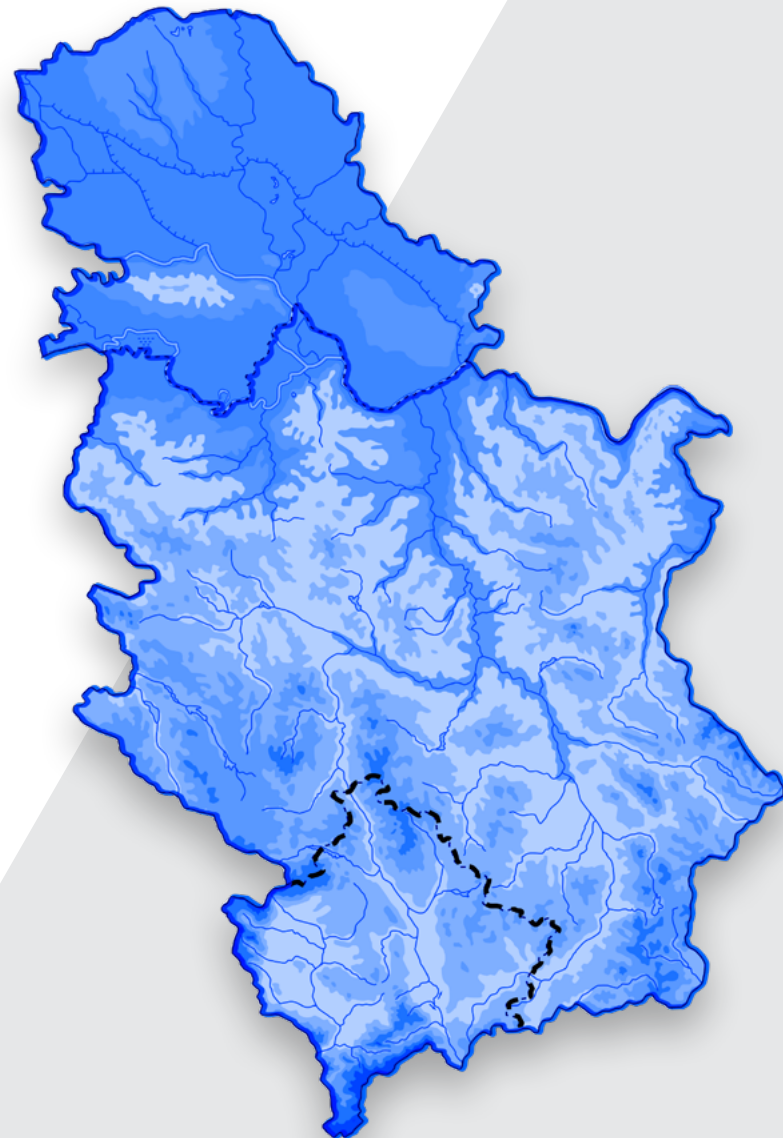


SERBIA

UNIFIED VOTER REGISTER ACCURACY AND AUDIT: THE CASE OF SERBIA

Vladimir Erceg

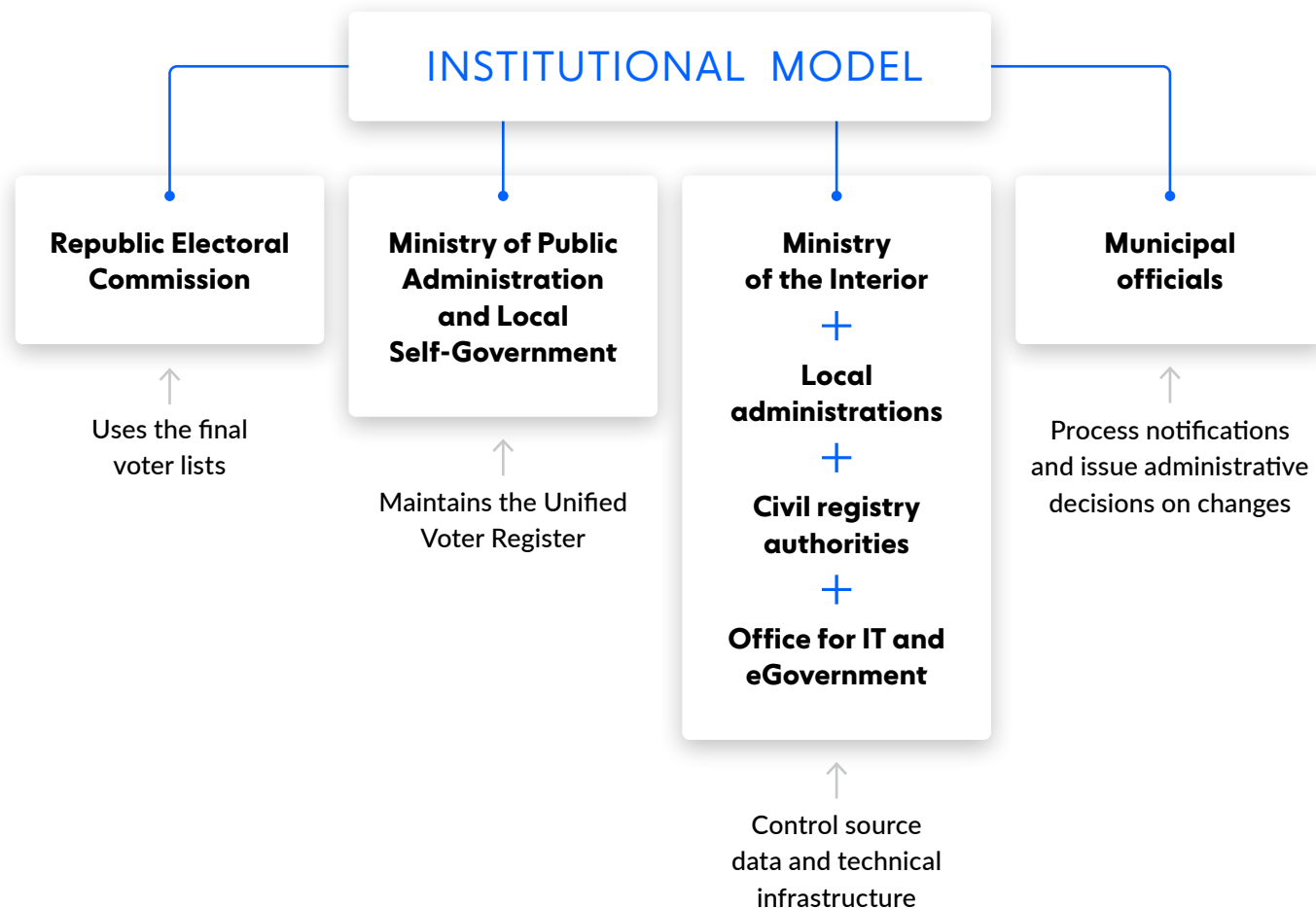
Special Program Manager,
Center for Research, Transparency
and Accountability (CRTA)



MAIN FACTORS CONTRIBUTING TO INACCURACIES IN THE VOTER REGISTER

Serbia uses a **passive, automatic voter registration system**. The Unified Voter Register (UVR) includes adult citizens with legal capacity who have registered permanent residence in Serbia.

Every change is **formalized through an administrative decision**. However, the accuracy of the UVR depends on the *quality of source data*, *information exchange*, and *consistent action* by the responsible officials.



FOUR MAIN FACTORS CONTRIBUTING TO INACCURACIES

1

WEAK PERMANENT RESIDENCE REGISTRATION SYSTEM

Actual residence is verified only when a new address is registered. There is no routine reverification, almost no incentive to report a change of residence, and penalties for failing to report a new address are merely symbolic.

2

INCONSISTENT DATA EXCHANGE

Street renaming, the assignment or alteration of building numbers, inadequate data-transfer procedures, and the limited capacity of municipal and Ministry of the Interior officials to update information promptly lead to discrepancies between the UVR and the Address Register.

3

VOTING RIGHTS OF CITIZENS ABROAD

Serbian citizens living abroad without an active permanent residence registration in the country are not included in the UVR. This creates incentives for formal or fictitious registration at addresses in Serbia, posing particular risks for local elections.

4

DELAYED REGISTRATION OF DEATHS

Information on deaths abroad – and, previously, in some rural areas of Serbia – may be reported late or not at all. Such inaccuracies can remain in the register for years.

RISKS TO ELECTORAL RIGHTS AND ELECTION INTEGRITY

An inaccurate entry in the UVR does not automatically mean that an unlawful vote was cast using that record. However, it indicates that safeguards have failed and creates an opportunity for deliberate abuse.

THE 2023 ELECTIONS CASE

During concurrent national and local elections, CRTA documented the following case:

Re-registered from a municipality where no election was taking place to an address in Belgrade



Transported to vote in an organized manner



Shortly afterward moved back to the previous address



According to CRTA's assessment, organized voter transportation, supervised voting, or indications of possible identity manipulation were observed at approximately **14% of polling stations in Belgrade**. The exact number of unlawfully cast ballots could not be determined, but the documented **mechanism could have affected the outcome** of the extremely close Belgrade elections.

NATIONAL AND LOCAL ELECTIONS

Parliamentary elections

Serbia is a single nationwide constituency. Moving a lawfully registered voter between municipalities does not in itself change the overall distribution of votes.

Local elections

Residence determines the municipality in which a voter may vote. Organized voter re-registration can alter the electoral outcome for genuine residents.

CRISIS OF PUBLIC TRUST

People from neighboring countries, particularly Bosnia and Herzegovina, acquired Serbian citizenship and documents and registered addresses in Serbia while continuing to live abroad.

- Dual citizenship is lawful; the key question is whether the residence was genuine and whether the registrations were coordinated for electoral purposes.
- Voter invitations addressed to unknown residents created the perception of large numbers of "phantom voters", although these were often ordinary inaccuracies.
- Low transparency and weak institutional responses deepened public distrust.

MECHANISMS FOR VERIFYING, AUDITING, AND UPDATING DATA

The UVR is routinely updated from source state registers. Voters can inspect their own records, request corrections, and use administrative or judicial remedies.

Individual inquiries cannot determine whether a register containing millions of records is accurate as a system.

Following the 2025 Reform, the Ministry Publishes:

- voters' full names by polling station
- the number of changes and the legal grounds for making them
- the number of voters registered at each address and household

An address-level inquiry service has operated since 15 May 2026. However, only about **2% of address records in Belgrade** include an apartment number. For most multi-apartment buildings, the service therefore shows only the total number of voters registered at the address.

Independent Verification by CRTA:

Combines:

- + citizen reports and protected insider testimony
- + observation of election-day movements
- + comparison of successive UVR extracts
- + analysis of changes and spatial concentrations
- + administrative documents
- + polling-station results

No single source is treated as conclusive.

79 Unique Reports of Possible Irregularities Since March 2026

- 64** — submitted directly by citizens
- 15** — identified through social media

Most concerned unknown or potentially unlawfully registered persons at specific addresses. These are leads for verification, not a confirmed count of incorrect records.

Audit Commission Established in November 2025

Commission may:

- analyze the UVR and source registers
- examine the legal grounds and history of changes
- initiate and supervise field checks

In spring 2026, the Commission mainly had access to individual records and could not conduct aggregate analysis or systematic cross-register matching. Historical and aggregate data became available only in late July.

- 12** — conducted in full
- 12** — conducted partially
- 45** — not conducted due to unavailable data

Important Limitation

The Office for IT and eGovernment may perform technical matching of the UVR against the citizenship, residence, and civil status registers. At the same time, the Commission must:

- define and control the methodology
- have access to the matching results
- validate individual cases

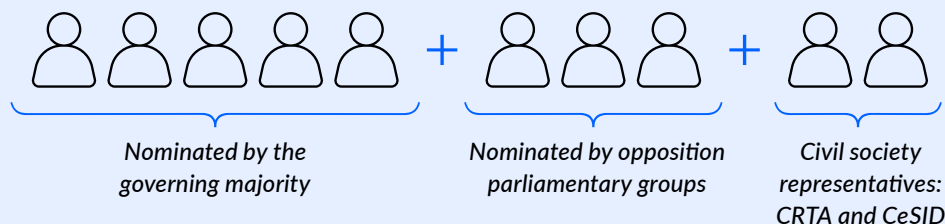
An independent audit cannot rely on results that auditors cannot independently verify or reproduce.

COOPERATION BETWEEN PUBLIC AUTHORITIES AND CIVIL SOCIETY

Before 2026, civil society largely operated outside the system.

COMPOSITION OF THE AUDIT COMMISSION

10 MEMBERS



DECISIONS REQUIRE:

7 VOTES

+

The support of at least two representatives from each of the three groups.

This prevents any single bloc from approving findings on its own and ensures civil society's involvement in defining the methodology, requesting data, reviewing cases, and approving conclusions.

WHAT HAS ALREADY BEEN ACHIEVED

- rules of procedure for the Commission have been developed
- a common methodology has been agreed upon
- broader access to historical and aggregate data has been obtained
- citizen reports have been referred for verification
- the development of cross-register matching tests has begun

WHAT LIMITS COOPERATION

- data owners and technical operators remain outside the Commission
- data are provided late or in formats unsuitable for analysis
- consequently, most checks could not be completed on time
- access planned for April 2026 was only partially provided in July

The authorities maintain the appearance that the Commission is functioning while delaying the provision of necessary data, whereas the opposition and civil society are working to ensure that its work is substantive.

APPROACHES THAT CAN BE APPLIED IN OTHER COUNTRIES

GENERAL LESSONS

1	Collect and Triangulate Independent Evidence	Citizen reports, protected sources, election-day observations, successive register extracts, spatial analysis, administrative documents, and polling-station results should form convincing, verifiable arguments demonstrating the need for change.
2	Build Broad Support Around the Evidence	Engage the public, experts, political actors, international organizations, and partners; explain the findings and remain open to scrutiny.
3	Develop Legal Solutions	Legislative changes and expert processes should enable an inclusive and effective resolution of the problem within the specific institutional and political context.
4	Push for Full Implementation	Build on the support already secured, use integration and reform processes as leverage, and demonstrate that voter register reform is part of broader reforms.
5	Maintain the Objective, Patience, and Flexibility	Long-term reform requires the ability to adapt without losing sight of the ultimate objective.

APPROACHES THAT CAN BE APPLIED IN OTHER COUNTRIES

LESSONS FROM THE VOTER REGISTER AUDIT PROCESS



Pluralistic Governance and Methodological Independence

A mixed composition strengthens legitimacy, but auditors must control the questions, matching criteria, and validation of results — even when the technical operations are performed by a state authority.



Anti-Deadlock Safeguard

Prolonged inactivity should trigger an automatic dissolution mechanism, maintaining participants' accountability and the body's political relevance.



Effective Powers

Access to data, the authority to initiate checks, conduct field visits, issue instructions, and communicate results publicly. An audit body must not become a merely decorative institution.



Operationally Defined Access

Individual records + aggregate data + change histories + source registers. Record-by-record access alone does not enable a systemic audit.



Privacy Protection

Role-based access, audit logs, aggregate-first analysis, justified access to individual records, restricted exports, and read-only mode make it possible to combine meaningful scrutiny with personal-data protection.



Data Transparency

For every confirmed problem, there should be a responsible authority, a deadline for correction, a documented outcome, and a public reporting mechanism.



Methodological Rigour

Ordinary inaccuracies must be clearly distinguished from deliberate manipulation, and the audit must not be used for short-term political gain in ways that could undermine its reputation.

Promo-LEX

Advancing democracy and human rights

MOLDOVA

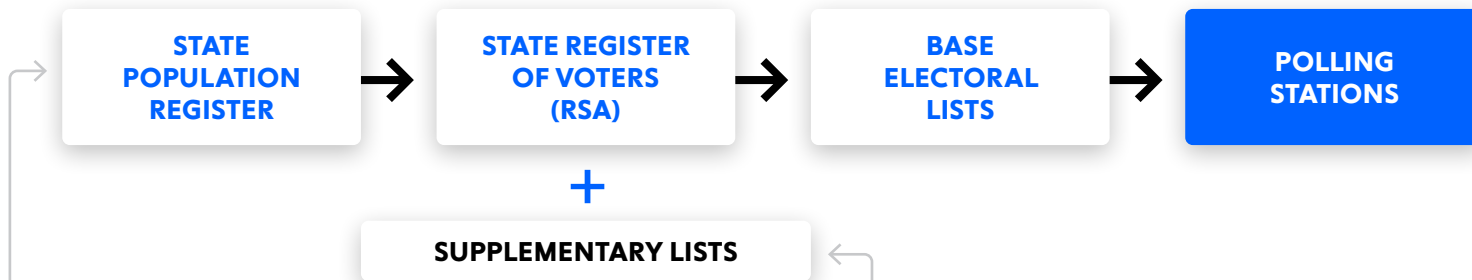
CIVIL SOCIETY AND VOTER REGISTER ACCURACY: THE CASE OF MOLDOVA

Nicolae Panfil

Program Director,
Promo-LEX



MOLDOVA'S VOTER REGISTER: HOW THE SYSTEM WORKS



Moldova uses a **passive, centralized voter registration system**. The State Register of Voters (RSA) is systematically updated using data from the State Population Register.

- Citizens do not have to register separately to be included on the voter register
- The Central Electoral Commission (CEC) maintains the nationwide State Register of Voters (RSA)
- RSA is systematically updated using civil-status and residence data from the State Population Register, managed by the Public Services Agency
- Before each election, CEC extracts the base electoral list for each polling station from RSA

Supplementary lists serve as an important safeguard for eligible voters who are not included in the base list. They are used, among others, for:

- voters abroad
- voters from the Transnistrian region
- citizens without a registered domicile or temporary residence at national elections and referendums

3,305,709

citizens with voting rights were included in RSA as of 3 August 2026

2,409,207

people were counted as having usual residence in Moldova in the final 2024 census

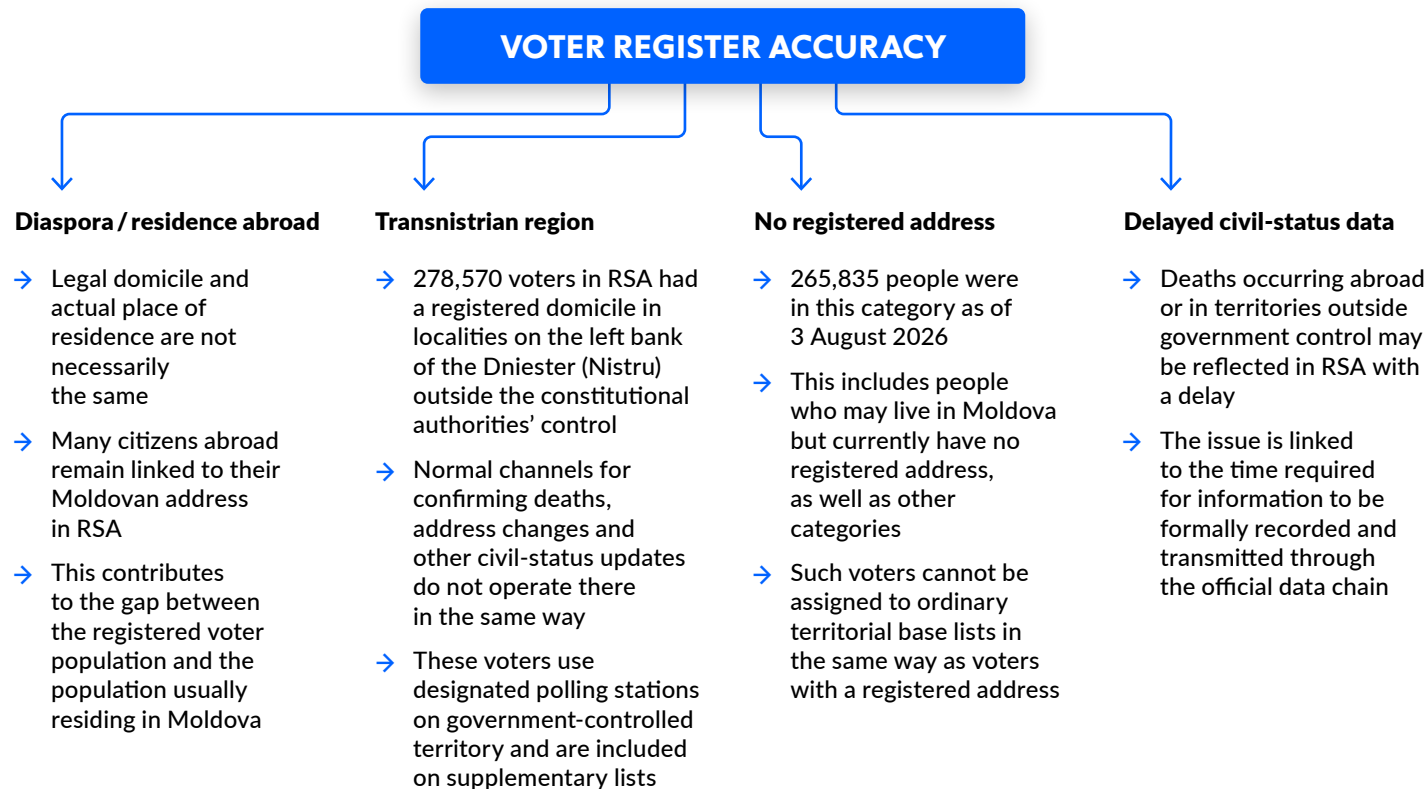
342,244

voters were recorded on supplementary lists during the 2025 parliamentary election

These figures refer to different populations and are not directly comparable

MOLDOVA'S VOTER REGISTER: MAIN FACTORS AFFECTING ACCURACY

The main challenges are linked not only to the voter register itself, but also to **population mobility**, **missing or delayed administrative data**, and **specific territorial circumstances**.



ADDITIONAL ISSUES

- Uneven local implementation may lead to incorrect polling-station assignments, missing voters, or records not being corrected promptly
- The previous problem of "artificial migration" has been substantially reduced through the requirement of three months of registered residence for local elections
- Promo-LEX's 2026 research found that the legally required Data Protection Impact Assessment had not been carried out for RSA and the state electoral information system

RISKS AND MECHANISMS FOR VERIFYING VOTER DATA

Inaccurate or outdated voter data can affect both individual voting rights and public trust, while Moldova has several mechanisms to verify and correct voter information.

MAIN RISKS

Voter disenfranchisement / inconvenience

- voter omitted from the list
- incorrect polling-station assignment
- outdated address information

Inaccurate base lists

- outdated voter information
- records requiring correction
- need to rely on supplementary lists

Public distrust and manipulation narratives

- register defects presented as evidence of electoral manipulation
- deceased persons or large supplementary lists may fuel distrust

Misuse of voter data

- personal data collected through online tools may be used in vote-buying schemes
- risks to privacy and electoral integrity

Manipulation of preregistration abroad

- 8,238 pre-registrations for Russia in 2024 (about eight times the 2021 figure); some 13,000 in 2025
- CEC found patterns suggesting registrations made for other people
- a confirmed pre-registration removes the voter from the base list

VERIFICATION MECHANISMS

Voter self-check

- “Verifică-te” (verifica.cec.md) service allows voters to check their registration and polling station online

Pre-election verification by voters

- voters can request inclusion or correction
- initial lists available for verification at least 22 days before election day
- changes may be requested no later than 7 days before election day

Administrative updating

- RSA is systematically updated from the State Population Register

Pre-election verification by registrars

- local registrars verify territorial assignment and update information
- final lists are produced after corrections

Public monitoring & transparency

- CEC publishes aggregate RSA figures every month
- allows media, observers and researchers to monitor changes and ask for explanations

Data-protection safeguards

- self-check service provides access only to the voter's own data
- full voter list is not downloadable
- need for strong authentication and access controls

CEC response and safeguards

- CEC rejected registrations that breached the rules and warned citizens not to share personal data
- Promo-LEX recommends stronger safeguards and reconsidering automatic exclusion from the base list

COOPERATION BETWEEN CEC AND CIVIL SOCIETY

Moldova combines institutional data management with independent civil-society scrutiny and structured post-election dialogue. Thus, civil society input can influence both practice and legislative proposals.

EXISTING COOPERATION MECHANISMS

1

INDEPENDENT ANALYSIS OF VOTER LISTS

- At CEC's request and under a Council of Europe-facilitated confidentiality arrangement, Promo-LEX analyzed electoral lists used in the 2020 presidential and 2021 parliamentary elections.
- The analysis found no evidence of voting in the name of deceased persons.

2

RESEARCH AND EXPERT COOPERATION

- CEC has cooperated with Promo-LEX research, including the 2026 study on personal data protection in elections.
- Cooperation included providing information and participating in interviews.

3

CONSULTATION ON LEGISLATIVE CHANGES

- In March 2026, CEC proposed limiting the base list to people who had participated in at least one of the previous three electoral events.
- Promo-LEX objected, warning that this could artificially reduce base lists and increase supplementary-list voting.
- The restriction was not included in Bill No. 280/2026, which was adopted in final reading on 24 August 2026..

4

POST-ELECTION ELECTORAL FORUM

- Brings together CEC, civil society, political actors and international partners.
- Reviews the previous election cycle and discusses issues such as voter lists and voting access.
- Observation findings can be discussed with election administrators and translated into recommendations.

APPROACHES THAT CAN BE TRANSFERRED TO OTHER CONTEXTS

Moldova's experience offers several practical approaches that can be adapted in countries with centralized voter registers – provided the necessary institutional and technical conditions exist.





ARMENIA

ARMENIA'S EXPERIENCE: PRACTICES AND CAVEATS

THE VOTER REGISTER AND SIGNED VOTER LISTS

Vardine Grigoryan

Program Manager,
Helsinki Citizens Assembly Vandazor Office



WHY OUR VOTER REGISTER WAS INACCURATE

THE REGISTER IS PASSIVE

A citizen is entered on the list automatically at the age of 18, provided they hold a registered address. Voters make no declaration about themselves.

MASS DEPARTURE IN THE 1990S

An earthquake, the Karabakh war, families leaving. The peak came in 1992–1994. People left the country but remained on the lists.

NO LAWFUL MEANS OF REMOVAL

Deaths of citizens abroad were not reported to the state. The register-keeping body had no power to remove absent persons on its own initiative.

THE INACCURACY SERVED AN INTEREST

Inflated lists created room for manipulating results and were convenient for the authorities of that period.

THE SCALE IN FIGURES (2015 DATA)

117%

the number of voters in Vanadzor exceeded the city's entire population, children included.

In 2005 the same figure stood at 96%.

85%

voters as a share of the country's entire population. It should have been 70–75%, since a quarter of the population are children.

600,251

records sharing an identical full name and patronymic). 130,000 of them in Yerevan, against only 9,000 out of 239,000 voters in Lori.

23 of 167

voters aged over 100 were found to be alive when the police carried out verification.

WHAT AN INACCURATE REGISTER MADE POSSIBLE: THE 2015 REFERENDUM

HOW IT OPERATED

Commissions made no attempt to bring voters to the polls. They took the lists containing personal data, filled them in and stuffed the ballot boxes.

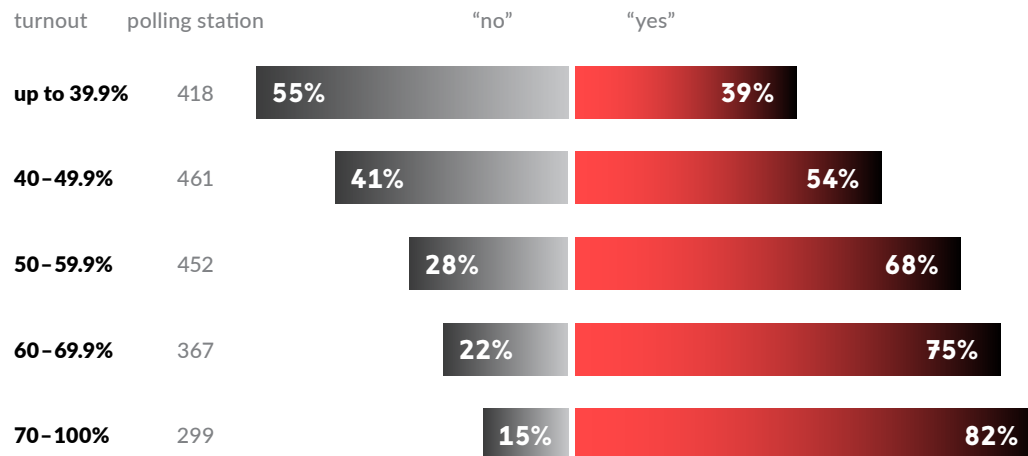
WHY AN INFLATED LIST WAS REQUIRED

The referendum was deemed adopted if a majority of participants voted in favour and, at the same time, no fewer than one quarter of all persons on the lists did so. It was this lower threshold that was manufactured.

A criminal complaint was filed covering every polling station where turnout exceeded 35%: genuine participation was estimated at 30–35%.

THE EVIDENCE: RESULT AS A FUNCTION OF TURNOUT

In a free vote, rising turnout does not alter the ratio of votes. In Armenia it altered systematically – which is itself evidence of large-scale ballot stuffing.



Analysis of all 1,997 polling stations nationwide. The higher the turnout, the wider the margin in favour of "yes": from 39% at the least active stations to 82% at the most active ones.

THE REVERSE SIDE: WHEN REGISTER CLEAN-UP GOES TOO FAR

2021

A SOLUTION THAT WORKED

THE VALID-DOCUMENT REQUIREMENT

A person is entered on the list if they hold a registered address in the country and a valid passport or ID card. Anyone living in Armenia would have renewed their document within the past 10 years.

It removes no one's right to vote: a voter restores their entry by obtaining a document or by registering at an address 12 days before election day.

2026

A DECISION THAT WENT FURTHER

THE RESIDENCY REQUIREMENT

Adopted on 3 July 2026, three weeks after the parliamentary elections: only those physically present in the country for 366 days out of the preceding 730 are eligible to vote.

It removes the right to vote itself. Exceptions: studies abroad, state service, diplomatic staff and their families — each to be substantiated by documents.

GROUNDINGS FOR OUR OBJECTION

- The Constitution permits deprivation of the right to vote solely by court decision: legal incapacity or a serious crime (Art. 48(4)).
- The rule applies retroactively: those absent last year can no longer alter their situation.
- The Venice Commission's Code of Good Practice permits a length-of-residence requirement for local elections only — not for national ones.
- We proposed applying the criterion to the voter list alone, leaving the right to vote intact.

The rule will be applied for the first time on 27 September 2026 — three weeks after this workshop, when the first in a series of local elections will take place. Elections will continue monthly through December, covering 46 communities in total, including Vanadzor.

WHAT ARMENIA PUBLISHES AFTER ELECTION DAY

1

Personal data

surname, first name, patronymic, date of birth, registered address

2

Document column – blank

the passport series and number are withheld: this is the “closed identification part”

3

Signature column

it is visible who signed and who did not — this is what enables self-verification

Scans of the lists from all 2,000 polling stations are published online within two days of the election, in a searchable format. Anyone may verify whether a vote was cast in their name.

ԱՅՈՒՆԻՔ ՄԵՆԻՐԻ (ԱԳԱՐԱԿ) («ԱՐԵՎԻՔ» ԱՐԿԵՍՏԻ ԴՊՐՈՑԻ ՀԵՆՔ, Գ.ՆԱՆԻՅԻ Փ. 6 Հ.)
Տարածքային ընտրական հանձնաժողովի սպասարկման 35/65 ընտրական տեղամաս

Գ/Գ	Ազգանուն	Անուն	Հայրանուն	Ծննդյան օր, ամիս, տարեթիվ	Հաշվառման վայրի հասցե	Անձի հաստատող փաստաթղթի տեղիս եւ համար	Ընտրողի ստորագրությունը	Հանձնաժողովի ընտրությունների գլխավոր համար պատժական տու անցածի անհատական կոդ	Լրացուցիչ նյութներ
35	Օհանջանյան	Ժորա	Կարենի	21/10/2002	Մայրա-Լուկայի Փ. 2 21			83-02140	
36	Օհանջանյան	Կարեն	Հովսեփի	26/05/1969	Մայրա-Լուկայի Փ. 2 21			83-02139	
37	Օհանջանյան	Հովհաննես	Կարենի	20/04/1999	Մայրա-Լուկայի Փ. 2 21				
38	Մարգարյան	Միխայել	Սեյրանի	23/07/1967	Մայրա-Լուկայի Փ. 2 22				
39	Օվոյան	Երջանիկ	Վարդիայի	16/07/1975	Մայրա-Լուկայի Փ. 2 22				
40	Հովհաննիսյան	Հեղինակ	Գրիշայի	22/12/1972	Մայրա-Լուկայի Փ. 2 24			70120-1	
41	Սահակյան	Գուրգեն	Ռուբիկի	21/01/1965	Մայրա-Լուկայի Փ. 2 24			70120-1	
42	Մարգարյան	Խաչիկ	Ռուբիկի	17/01/1966	Մայրա-Լուկայի Փ. 3 1			83-02271	
43	Մարգարյան	Լարե	Խաչիկի	16/09/1993	Մայրա-Լուկայի Փ. 3 1				
44	Մարգարյան	Ռուբիկ	Խաչիկի	07/12/1991	Մայրա-Լուկայի Փ. 3 1				
45	Դազարյան	Արմիկ	Դեմոնի	28/02/1951	Մայրա-Լուկայի Փ. 3 2			83-02140	
46	Բարսամյան	Ավագ	Ռաֆիկի	10/10/1964	Մայրա-Լուկայի Փ. 3 3				

Extract from a published signed voter list.

We deliberately chose electoral integrity at the cost of privacy.

The Venice Commission's Code of Good Practice in Electoral Matters (point 4.c) advises against publishing lists of those who voted. OSCE/ODIHR takes the same position.

HOW THE REGISTER IS VERIFIED BETWEEN AND DURING ELECTIONS



PRE-ELECTION PUBLICATION OF THE LISTS

Polling-station lists are posted online, searchable and downloadable. Verification is open to anyone — a party, an organisation, an individual, including by door-to-door checks.

40 days before election day



VOTER APPLICATIONS

In person or online. Anyone may file, not necessarily on their own behalf: if unknown persons are registered at your address, you may report it.

12 days before election day



THE REGISTER IS KEPT OUTSIDE THE ELECTION ADMINISTRATION

It is maintained by the Migration and Citizenship Service of the Ministry of Internal Affairs, which already holds citizens' data for other, day-to-day purposes.

synchronised every 6 months



VERIFICATION BY THE POLICE

The police verify the lists on their own initiative, treating this as their duty, since they are accountable for their accuracy.

continuous

The register should be maintained by a body for which this data is a day-to-day working instrument.

Were the list kept by an election commission, it would be compiled for the sake of the vote alone — and no time would ever be spent on synchronisation in between.

In Armenia no one has at any point questioned that the register is maintained by the Ministry of Internal Affairs.

COOPERATION ON THE VOTER REGISTER

CENTRAL ELECTORAL COMMISSION

Does not deal with the quality of the register. Jointly with the Migration Service it informs voters that the lists have been published and that errors may be reported.

MIGRATION SERVICE

Maintains the register within the Ministry of Internal Affairs and synchronises the data. Our communication with it is continuous.

CIVIL SOCIETY

Information campaigns, verification of the lists, countering disinformation, advocacy for reform.

There are no working groups, no regular consultations and no joint review of shortcomings. Communication itself, however, is continuous.

2016

PUBLICATION OF SIGNED VOTER LISTS

The demand was carried through after four years of pressure

- 2012: 28 members of parliament challenged the ban on publication before the Constitutional Court — the Court upheld the ban
- 2014: the demand was included in the opposition's twelve-point declaration
- 2016: the authorities conceded during the adoption of the new Electoral Code

2026

THE RESIDENCY REQUIREMENT

The rule was adopted despite the objections of civil society

- the rule: 366 days out of 730, adopted on 3 July 2026
- only one meeting with parliament took place before adoption
- the initiative was not taken seriously: it was assumed that a plainly unconstitutional rule would never reach substantive debate

An initiative that appears plainly unconstitutional requires the same systematic work as any other.

WHICH ELEMENTS OF THIS EXPERIENCE MAY BE USEFUL

1

VOTER-INITIATED REGISTRATION

Voters register themselves where they are actually present. For the first post-war elections in Ukraine this may be the most workable solution.

2

THE REGISTER IS KEPT BY A BODY FOR WHICH THE DATA IS A DAY-TO-DAY INSTRUMENT

Not a body that needs the list only for the election period. With mandatory regular synchronisation of the data.

3

A VALID-DOCUMENT REQUIREMENT INSTEAD OF DEPRIVATION OF RIGHTS

A clean-up mechanism that entails no deprivation of the right to vote and is reversed by the voter's own action.

4

PUBLICATION OF SIGNED VOTER LISTS

The most effective preventive safeguard in Armenian practice. Introduced contrary to the position of the Venice Commission, in the absence of other means of countering falsification.

5

OUT-OF-COUNTRY VOTING

CAVEAT, NOT A RECOMMENDATION

For Ukraine, abandoning out-of-country voting would be unacceptable. Outside the country, however, it is difficult to guarantee equality of campaigns and any response to violations without cooperation from the host state.

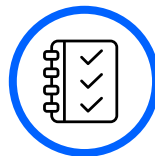
In the Armenian case the principal country of residence was the Russian Federation, and such cooperation could not be established.

KEY CONCLUSIONS



TRANSPARENCY PROVED EFFECTIVE

Since the introduction of published signed voter lists, instances of voting on behalf of absent persons have ceased — even though systematic verification of the lists has effectively been discontinued. It is the very possibility of verification that acts as a deterrent.



YET ACCURACY OF THE REGISTER IS NOT AN END IN ITSELF

Armenia has moved from lists that exceeded the size of the population to a rule that removes the right to vote for prolonged absence from the country. The second problem has proved harder to resolve than the first: an inflated list is evident to everyone, whereas a restriction of rights is perceived as putting matters in order.

Inflated lists



Transparency



Accuracy



Limits of clean-up



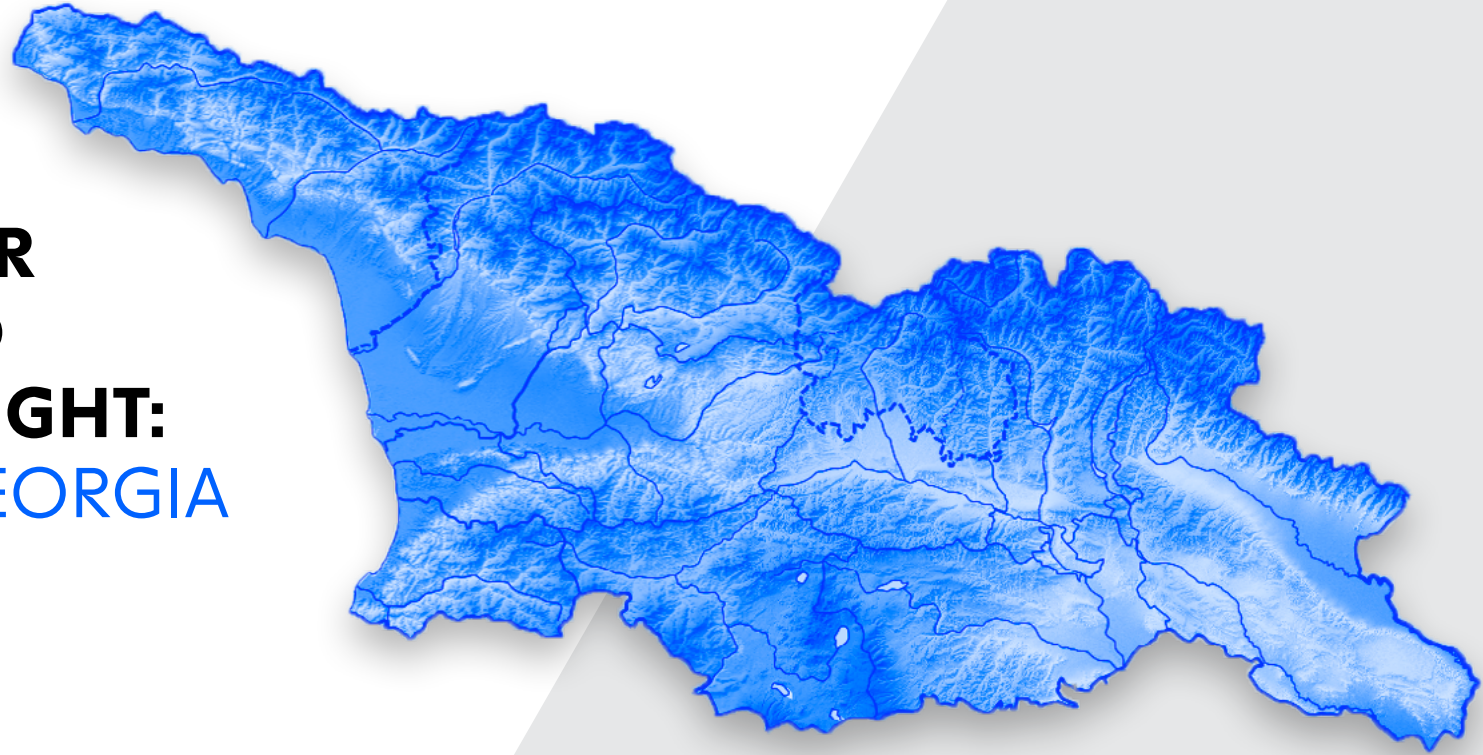
ISFED
INTERNATIONAL SOCIETY FOR
FAIR ELECTIONS AND DEMOCRACY

GEORGIA

VOTER REGISTER INTEGRITY AND CITIZEN OVERSIGHT: THE CASE OF GEORGIA

Levan Natroshvili

Executive Director,
International Society for Fair Elections
and Democracy (ISFED)



WHAT AFFECTS THE ACCURACY OF GEORGIA'S UNIFIED VOTER LIST



REGISTERED ADDRESS ≠ ACTUAL PLACE OF RESIDENCE

Passive updating through the PSDA does not fully capture urbanization and internal migration.



MASS EMIGRATION

In the 2024 elections, **95,910 voters** were registered at **67 consular polling stations**. Out-of-country voting was abolished in 2025.



UNREGISTERED DEATHS

Without an official death record, a person may remain on the voter list. This issue is particularly relevant in rural areas.



DOCUMENT-RELATED RESTRICTIONS

Voters with expired ID cards and no valid passport are automatically removed from the voter list, disproportionately affecting vulnerable groups.

CONCLUSION

Administrative records do not always reflect voters' current geographic distribution and status.

HOW INACCURACIES CAN AFFECT ELECTORAL RIGHTS AND ELECTION INTEGRITY

POLITICAL CONTROL OVER VOTERS

Electoral and administrative data have been used to compile partisan dossiers, monitor turnout, and exert pressure on voters.

MISUSE OF OTHER PEOPLE'S DATA

Outdated records concerning deceased or absent voters create risks of voter impersonation, multiple voting, and carousel voting schemes.

TURNOUT ANOMALIES

ISFED's analysis identified polling stations where male turnout exceeded **100% of registered male voters**.

CONCLUSION

Inaccurate voter lists **turn technical weaknesses into vulnerabilities** that can be exploited to manipulate the electoral process.

VERIFICATION MECHANISMS



Inter-agency data synchronization

The PSDA cross-checks the voter list against civil status registers and removes deceased voters. Unregistered deaths and the abolition of out-of-country voting mechanisms remain challenges.



Voter Identification Devices

Used at approximately **74% of polling stations**, these devices help prevent duplicate voting within the same polling station but do not perform biometric verification.



Independent civil society oversight

Civil society organizations use Parallel Vote Tabulation (PVT), turnout analysis, and audits of digital voter lists.

WHAT HINDERS COOPERATION BETWEEN THE CEC AND CIVIL SOCIETY



LACK OF TRANSPARENCY IN TECHNOLOGY AUDITS

Audits, including those conducted by Pro V&V, took place without meaningful participation from civil society, and their findings were released only after the elections.



RESTRICTED ACCESS TO DATA

Civil society organizations were denied access to lists of voters who participated in voting, Voter Identification Device logs, and information needed to investigate possible misuse of citizens' personal data.



HOSTILE REGULATORY ENVIRONMENT

Restrictive legislation, political pressure, and changes to the procedures for handling complaints by election commissions have weakened institutional dialogue.

CONCLUSION

Formal consultations are insufficient without **timely access to data** and **oversight mechanisms**.

EFFECTIVE PRACTICES AND LESSONS LEARNED

FORENSIC DEMOGRAPHIC AND GENDER TURNOUT ANALYSIS

Helps identify statistical anomalies that standard procedural checks may fail to detect.

Preconditions
for applying
this experience
in other countries

INDEPENDENT OVERSIGHT OF ELECTORAL TECHNOLOGIES

Digital voter identification requires pre-election certification and scrutiny of source code and system audit logs.

ON-THE-GROUND DATA VERIFICATION

Technological solutions should be complemented by proper administrative records and direct data verification within communities, particularly in rural areas.

PROTECTION OF UNIVERSAL SUFFRAGE

Technology cannot compensate for statutory restrictions on voting rights: mobile populations must have a meaningful opportunity to exercise their right to vote.

CONCLUSION

Technology is effective only when combined with **independent oversight, transparency, and legal safeguards.**



Federal Foreign Office



INTERNATIONAL WORKSHOP

CIVIL SOCIETY AND THE ACCURACY OF VOTER REGISTERS: INTERNATIONAL EXCHANGE OF EXPERIENCE AND JOINT RECOMMENDATIONS

This workshop was provided as part of the project, funded by the German Federal Foreign Office. However, the views expressed herein do not reflect the official policy of the Government of Germany.

