

ELECTION ADMINISTRATION OF GEORGIA

ELECTION
INTEGRITY
MANAGEMENT
PLAN

MAY 2016





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OF GEORGIA ELECTION INTEGRITY MANAGEMENT PLAN

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I. INTRODUCTION

A. CEC COMMITMENT STATEMENT TO MANAGING ELECTORAL INTEGRITY RISKS

Election integrity is the responsibility of all electoral stakeholders including the Election Administration (EA), other state bodies tasked with supporting the electoral process, policymakers and legislators, political parties, candidates, civil society engaged in the electoral process, media, and voters as well as the international community supporting the development of electoral democracy in Georgia.

Concerning those election integrity matters that are within the mandate and competence of the Central Election Commission (CEC) of Georgia, the CEC is committed to actively managing the integrity of democratic elections in the country according to the approach and methods described in the Election Integrity Management Plan (EIMP).

The CEC's institutional commitment to electoral integrity is captured in the following statement:

Effective electoral integrity management is central to the sustainability of democratic elections in Georgia.

A strategic goal of the CEC is to institutionalize sound management practices at all levels of EA. Specifically, the CEC will pursue this institutional goal by:

- Recognizing that the management of electoral integrity risk must permeate the institutional culture of EA in Georgia and every aspect of its work;
- Regularly assessing electoral integrity vulnerabilities and the adequacy of existing risk mitigation, strategies and measures;
- Planning to detect, deter, and mitigate risk;
- Promoting electoral integrity awareness within the EA and among electoral stakeholders:
- Establishing a tradition of working with other electoral stakeholders to uphold their responsibilities for electoral integrity.

B. RELEVANT PROVISIONS OF THE STRATEGIC PLAN

In support of this commitment, the CEC has incorporated the priorities directly and indirectly related to election integrity throughout its Strategic Plan (2015-2019) and in particular:

1. Institutional Strengthening

Goal #1: Ensure effective EMB management

Objective #6: Improved risk management system

Activity #1: Develop and establish organizational risk management procedures

Activity #2: Develop and establish regular system for monitoring risk management.

2. Electoral Environment

Goal #2: Ensure electoral integrity

Objective #1: Integrity of electoral processes strengthened

Activity #1: Develop and implement an Election Integrity Management Plan.

C. RISK CATEGORIZATIONS

The CEC recognizes the following conceptual framework, which was developed by the International Foundation for Election Systems (IFES) using a proprietary assessment methodology and is comprised of three risk categories:

i. Systemic manipulation: the use of domestic legal provisions and/or electoral rules and procedures that run counter to widely accepted democratic principles and international standards, and that purposefully distort the will of voters.

- **ii. Malpractice:** a breach by a professional of his/her relevant duty of care, resulting from carelessness or neglect.
- **iii. Fraud:** deliberate wrong-doing by election officials or other electoral stakeholders, which distorts the individual or collective will of the voters.¹

Central to this conceptual framework is the understanding that all electoral stakeholders have a role to play in upholding and protecting electoral integrity. Furthermore, the types of risks that exist within a given context will reveal which stakeholders need to act in order to address those risks. Specifically, some risks fall within the mandate and competence of the CEC to remedy, for example some of the risks related to fraud or malpractice. Some risks associated with fraud and malpractice will also need to be addressed by a mix of actors. Risks associated with systemic manipulation, conversely, fall under the Parliament of Georgia; however, political parties should undertake respective measures for preparing and initiating legislative changes.

 Patented conceptual framework developed by International Foundation for Electoral Systems (IFES)

II. JUSTIFICATION FOR THE ELECTION ADMINISTRATION ELECTION INTEGRITY MANAGEMENT PLAN AND ELECTION INTEGRITY MANAGEMENT PRIORITIES

This Election Integrity Management Plan has been prepared on the basis of the experience of EA and international best practices. The extensive analyses including election observer reports, technical electoral assessments, and stakeholder input covering multiple electoral cycles dating from 2012 have been applied as a source. Particularly influential has been IFES' comprehensive Election Integrity Assessment (EIA), which was conducted in the Spring of 2014 and which distinguishes between systemic manipulation, fraud, and malpractice along with the corresponding stakeholder responsibilities for risk mitigation.

The EIA assessment methodology is not based solely on past breaches of election integrity. It also looks closely at vulnerabilities that could result in systemic manipulation or fraud, if intent presents, or contribute to malpractice at some point in the future. It is a forward looking methodology intended to enable pro-active planning to mitigate risks to election integrity in the longer term. The quantitative aspect of the methodology also allows for prioritization of vulnerabilities and, subsequently, risk mitigation actions.²

Areas of the electoral system where at least some vulnerability is present³ and that fall directly or indirectly within the CEC's authority and competence form the justification for the risk mitigations strategies and actions laid out in this EA's Election Integrity Management Plan.

These include:

RISK CATEGORY	SYSTEMIC MANIPULATION	MALPRACTICE	FRAUD
	Institutional Framework	Institutional Framework	Electoral Disputes
	Boundary Delimitation	Infrastructure and Planning	Vote Tabulation
		Legal Framework	Voting Operations
		Election Observation and Monitoring	Final Results
		Voting Operations and Special Services	
Subcategory		Summarizing Results	
		Voter Registration	
		Election Security and Roles of Law Enforcement Agencies (cyber security would fall under this sub-category)	
		Election Disputes	
		Public Information and Voter Education	
		Training and Capacity Building	
		Certification of Results	

3. Specifically, the sub-categories used as part of the EIA include: (1) legal framework, (2) electoral system and Boundary delimitation, (3) institutional framework, (4) media and political finance, (5) infrastructure and planning, (6) election observation and oversight, (7) adjudication of grievances, (8) public information and voter education, (9) training and capacity building, (10) voter registration, (11) election security and role of the security forces, (12) election budgeting, (13) voting operations / voter services, (14) counting, and (15) aggregation and certification of results.

III. ELECTION ADMINISTRATION ELECTION INTEGRITY MANAGEMENT PLAN: RISK MITIGATION STRATEGIES AND ACTIONS

In response, the CEC has adopted the Election Integrity Management Plan. The CEC has elaborated in a matrix (priorities for mitigating systemic manipulations, fraud, and malpractice: risk mitigation strategies and actions that fall within the authority and competence of the CEC of Georgia) of the risk mitigation strategies and actions. Again, these risk mitigation strategies and actions are specific to the CEC's authority and competence or reflect opportunities for research, expert commentary, public information and education, or external outreach and coordination vis-à-vis other responsible stakeholders. In addition, the matrix includes critical assumptions. It identifies persons within the Commission and the CEC office who are responsible for ensuring the achievement of the enumerated strategies and actions, budgetary / resource allocations, the timetable for implementation, and status.

In the interests of transparency and accountability, the CEC supports the full or partial disclosure, as appropriate, of aspects of the EIMP. Toward this end, the CEC has invited its partners within civil society to comment on the draft plan and the final plan reflects their input. The CEC welcomes civil society and media monitoring of the CEC progress toward implementing the plan and meeting its targets. Because of there remain additional election integrity risks that are outside of the scope of the CEC and require remedies by other electoral stakeholders. The CEC looks forward to working with those actors to close the gaps to full and sustainable election integrity in Georgia.⁴

 For more information, please see priorities for mitigating systemic manipulation, fraud and malpractice; Risk Mitigation Strategies and Actions that fall within the Authority and Competence of the CEC of Georgia

IV. CEC ELECTION INTEGRITY WORKING GROUP

For the purposes of preparing the CEC's EIMP, to coordinate and oversee implementation of the plan, and to facilitate external outreach and collaboration on broader election integrity issues, the CEC created a special working group dedicated to election integrity.

The group consists of the CEC members, heads of structural units, representatives of the CEC Training Center and advisor to the CEC chairperson.

V. PROCESS FOR DEVELOPMENT AND FINALIZATION OF THE CEC'S INTERNAL ELECTION INTEGRITY MANAGEMENT PLAN

The internal EIMP was developed by the working group and conveyed to the CEC members for further discussion and recommendations. After issuing the recommendations the plan along with the matrix (priorities for mitigating systemic manipulations, fraud, and malpractice: risk mitigation strategies and actions that fall within the authority and competence of the CEC of Georgia) was introduced to all DEC members including those involved in the research conducted by the IFES. In addition the plan was presented to the local NGOs working on the election issues.

At the final stage the EIMP and the Matrix (priorities for mitigating systemic manipulations, fraud, and malpractice: risk mitigation strategies and actions that fall within the authority and competence of the CEC of Georgia) were discussed by the CEC.

VI. IMPLEMENTATION OF THE CEC'S INTERNAL ELECTION INTEGRITY MANAGEMENT PLAN

A. EIMP TRAINING PLAN FOR ELECTION COMMISSIONERS AND STAFF

Immediately upon adoption of the EIMP, the CEC will conduct a series of internal meetings for its personnel to facilitate institution-wide understanding of the approved plan and responsibility for its implementation. Meetings will be conducted for the full commission membership and all department heads. Department heads will be responsible for informing their staffs. The CEC will also ensure that meetings are conducted for the members and key personnel of all District Election Commissions (DEC). In collaboration with the Center for Election Systems Development, Reforms, and Trainings (CEC Training Center), the CEC will incorporate the EIMP into training programs for permanent and temporary (EA) staff to ensure that they can support the successful implementation of the plan.

B. IMPLEMENTATION OF THE CEC'S EIMP

The EA of Georgia shall adopt the Election Integrity Management Plan by an individual administrative act and carry out the activities set forth in the EIMP and its matrix in the period of 2016-2019.

C. CEC'S EIMP PUBLIC INFORMATION AND OUTREACH STRATEGY

As soon as the EIMP is adopted, internal meetings for CEC members and staff and DECs have been completed, and an external communications plan prepared, the CEC will conduct a series of external meetings on the public components of the EIMP. Meetings will be arranged for the CEC's working groups and via other public information and outreach efforts. These efforts will be directed at civil society groups engaged in election activities and representing key target groups including women, youth, minorities, and persons with disabilities as well as media organizations and political parties. The intent of these meetings is to raise awareness and understanding of multiple stakeholder groups about election integrity risks in Georgia (including those beyond the control of the CEC).

The CEC is fully committed to transparency and public accountability for its actions. This commitment extends to implementation of the EIMP. The CEC will provide periodic updates on its progress toward improved electoral integrity and welcomes related monitoring efforts by electoral watchdogs.

D. MONITORING AND EVALUATION

A performance monitoring plan represents a tool for evaluating the work of the CEC. The plan will be elaborated by the working group in 2016. The CEC will regularly monitor and report about the progress under the plan. The CEC would also welcome the support of other electoral stakeholders in achievement of key benchmarks and milestones.

VII. NEXT STEPS IN ADDRESSING WIDER ELECTION INTEGRITY ISSUES IN GEORGIA

The CEC is not solely responsible for ensuring electoral integrity in Georgia. Other electoral stakeholders have a role to play in mitigating and managing associated risks. As such, the CEC will work to further build stakeholder awareness about the election integrity assessment conceptual framework and methodology, the findings and recommendations of IFES' *Georgia Election Integrity Assessment Report*, the CEC's own election integrity management planning process.

CENTRAL ELECTION COMMISSION OF GEORGIA — ELECTORAL INTEGRITY MANAGEMENT PLAN

PRIORITIES FOR MITIGATING SYSTEMIC MANIPULATION, FRAUD, AND MALPRACTICE
RISK MITIGATION STRATEGIES AND ACTIONS THAT FALL WITHIN THE AUTHORITY AND COMPETENCE OF THE CEC OF GEORGIA

Category and Status	Priority Area	Risk Mitigation Strategies/Actions	Critical assumption	Responsible Departments/Persons	Status	Implementation Timetable
Systemic Manipulation	Legal Framework	Review legal framework and provide recommenda- tions for reform on technical issues		Legal Department Electoral Processes Management Department	Ongoing/ Upon the end of review	completed
		External consultations with stakeholders	Stakeholders express interest towards the issues	Legal Department Public Relations Department	Ongoing/Upon the end of review	Permanent
		Develop an education/ information program for voters and stakeholders on legal frameworks: General Focused on specific needs (amendments)	Amendments are passed	Training Centre Public Relations Department Legal Department Legal Department Electoral Processes Management Department	Ongoing/Based on amendments	Permanent
Systemic Manipulation	Boundary Delimitation	CEC ensured holding workshops to discuss and develop standards that could be used to draw new constituency boundaries as requested by the respective responsible bodies	• The law is adopted	Electoral Processes Management Department Legal Department Public Relations Department	Upon request but no later than March 15	Completed
		The process shall be managed with a respect to local legislation and international standards	Legal regulation exists	Electoral Processes Management Department Legal Department	In timeframes prescribed by law but not later than April 1	Completed
		Within its authority, the CEC will conduct outreach to political parties and CSOs	The interest is expressed	Public Relations Department Legal Department Electoral Processes Management Department	Permanent/ based on the amendments	Completed

Fraud	Election Dispute Resolution	Hold consultations to ensure due process through extending timelines and simplifying processes	The interest of stakeholders is expressed	Legal Department	Permanent/ based on amendments	Ongoing
		Ensure comprehensive training programs for all stakeholders	Financial/ technical resources are in place	Training Centre Legal Department	Permanent	Ongoing
		Keep a record of com- plaints that have not been discussed for being filed in violation of the law and holding consultations with interested parties (electoral stakeholders) to prevent such cases	Existing technical expertise	Legal Department Information Technologies Department Electoral Processes Management Department District Election Commissions	After every elections	Under planning
		Pilot an SMS-based monitoring and mapping system which will enable to identify trends based on complaints	Informational and telecommunication technologies' integrity and accessibility Infrastructure is properly managed	Information Technologies Department Electoral Processes Management Department Legal Department District Election Commissions	No later than 2018	Under planning
		Identify and train a team of investigators on a core set of international standards related to conducting investigation of electoral violations		Internal Audit Service Legal Department Electoral Processes Management Department	Before elections	Under planning
Fraud	Counting	Ensure PEC are publishing precinct level results as set forth by legal requirements informing on publishing rules		Electoral Processes Management Department District Election Commission Training Centre	Before elections	Under planning
		Review PEC process/forms in regard to internation- al standards relating to accounting for all ballots in results protocols	Consensus among interested stakeholders	Central Election Commission	Discussed and completed	Discussed and completed
		Ensure that making copies and disclosing all results protocols takes place with a respect to relevant legislation and in a consistent manner	Managing respective educational programs	Electoral Processes Management Department District Election Commissions Training Centre	Current/completed	Permanent
		Secure all electoral materials for transport	Security ensured	Central Election Commission Electoral Processes Management Department	Ongoing	Permanent

Fraud	Voting Operations	Conduct a regular review and update of security measures	Procedures are in place	Central Election Commission Information Security Manager Training Centre	No later than 2016	Ongoing
		Review and update assisted voting guidelines, training and outreach efforts to ensure that assisted voting process meets international standards	The legislation provides for the possibility of assisted voting	Coordination, Planning and Reporting Department Legal Department Electoral Processes Management Department Training Centre	No later than 2016	Ongoing
Malpractice	Institutional Framework	Further develop effective organizational structure	Organizational structure is in line with legislative requirements CEC enjoys the discretion of modifying the structure	Human Resource Management Service	Ongoing/ Completed	Partially completed
		Create a mechanism to better coordinate with other government entities involved in the electoral process (e.g., SAOG, MOI, etc.)	Readiness for cooperation is expressed by other entities	Central Election Commission	No later than 2016	Ongoing
Malpractice	Infrastructure and Planning	Develop and implement an action plan based on the strategic plan	Legislative amendments are passed	Electoral Processes Management Department Legal Department	No later than 2016	Ongoing
		Develop and implement an Electoral Integrity Management Plan	CEC's consent, consensus	• Election Integrity Management Working Group	No later than 2016	Ongoing
		Review and provide proper infrastructure for PECs	Working Group is created Regular communication with respective organs	Electoral Processes Management Department District Election Commissions Finance Department	No later than 2017	Ongoing
		Review and update methods to better enforce codes of ethics		Human Resource Management Service Legal Department Electoral Processes Management Department	No later than 2016	Ongoing
Malpractice	Legal Framework	• Review legal framework and provide recommendations for reform on technical issues		Legal Department	Ongoing	Partially completed
		Consultations with electoral stakeholders	Stakeholders express interest towards the issues	Legal Department Public Relations Department	Ongoing/ Based on amendments	Permanent
		Develop an education program for voters and stakeholders on legal frameworks: General	Amendments are passed	Training Centre Public Relations Department Legal Department Electoral Processes Management Department	Ongoing/ Based on amendments	Ongoing/ completed
		Focused on specific needs		Management Department		

Malpractice	Election Oversight and Observation	Expand observer training and specifically on international standards	Interest is expressed The demand exceeds available resources	Training Centre	No later than 2016	Current
		Build the capacity that gives the CEC better tools to manage disruptions on Election Day within PECs and other relevant establishments. Search for ways in which to ensure application of respective standards such that observer groups can perform independent observation and also not hinder the process.	Consensus among stakeholders	Central Election Commission Legal Department Training Centre	Permanent	Permanent
Malpractice	Voting Operations	Research ways of increasing voter turnout in regard to OCV through communicating with other responsible bodies	Respective budget available Interest expressed from stakeholders Communication established	Central Election Commission Electoral Processes Management Department	No later than 2018	Ongoing
		Increase and extend VE to DPOs regarding accessibility services	Web-page developed and accessible Respective legislation in place Respective infrastructure in place	Coordination, Planning and Reporting Department Public Relations Department Training Centre	No later than 2016	Ongoing
		Research and consider options to alleviate overcrowding at the PECs.		Central Election Commission Electoral Processes Management Department	No later than 2017	Ongoing
Malpractice	Final Results	Analyse protocols forms, study their intelligibility and establish mechanism for respective actions	The CEC is equipped with data and relevant program in order to identify suspicious trends on e-day	Electoral Processes Management Department Information Technologies Department	After elections	Under planning
		Ensure that all PEC/DECs fully respect standardization requirements in regard to results aggregations process.		Electoral Processes Management Department Training Centre	Before the E-day	Under planning
Malpractice	Voter Registration	Expand VE regarding the list and how to update the list	Accessibility of relevant and timely information	Public Relations Department Electoral Processes Management Department	Before the E-day	Under planning
		Study the means and capacity at the CEC's possession to increase trust towards the VL	• Legal capacit	Central Election Commission Public Relations Department	Four times a year	Ongoing
		Coordinate the other government entities so that they timely and fully acquire all the data to create voters databases	Communication is established Readiness of other agencies to cooperate	Information Technologies Department Electoral Processes Management Department	Ongoing/ completed	Partially completed

Malpractice	Electoral Security	Assign/create a position/ function of an election security point person within the CEC	Respective resources	Central Election Commission	Partially completed/No later than 2016	Partially completed
		Carry out security risk analyses		Central Election Commission	Under planning	Under planning
		Consider possibilities for creating an inter-agency working group for ensuring electoral security	Readiness of other stakeholders	Central Election Commission	Ongoing	Under planning
		Create and implement more hands-on security training modules		Training Centre Legal Department	Under planning	Under planning
Malpractice	Election Dispute Resolution	Further strengthen trainings for stakeholders on the EDR process	The interest of stakeholders	Training Centre Legal Department	Permanent/ completed	Permanent
		Design a training module for PEC members on EDR (targeted for PEC members that have been placed on the PEC at the last minute)	Financial/ technical resources in place Existing technical expertise	Legal Department Electoral Processes Management Department District Election Commissions	Permanent/ completed	Permanent
		Pilot an SMS-based monitoring and mapping system which will enable to identify trends based on complaints	Informational and telecommunication technologies' integrity and accessibility Infrastructure is properly managed	Information Technologies Department Electoral Processes Management Department Legal department District Election	No later than 2018	Under planning Under planning
				Commissions		
		Identify and train a team of investigators on a core set of international standards related to conducting investigation of electoral violations	Resources' availability	Internal Audit Service	Before elections	Under planning
Malpractice	Voter Education	Expand VE activities between elections	Resources' availability	Training Centre Public Relations Department	Permanent/ ongoing	Permanent/ ongoing
		Adapt a long-term VE plan		Training Centre	Permanent/ ongoing	Permanent/ ongoing

Malpractice	Training	Add training thematic on institutional strengthening in the training programs conducted for DECs	Resources' availability	Human Resource Management Service All departments	Permanent/ ongoing	Permanent/ ongoing
		With the aim of internal capacity building of election administration to expand training thematic between elections	Institutional capacity of DECs	Human Resource Management Service All departments	Permanent/ ongoing	Permanent/ ongoing
		Improve training for ethnic minorities	Communication and cooperation with minority group established	Training Centre Coordination, Planning and Reporting Department	Permanent/ ongoing	Permanent/ ongoing
Malpractice	Counting	Ensure that all PEC/DECs fully respect standardization requirements in regard to results transferring results to DECs/CEC		Electoral Processes Management Department	Before the E-day	Under planning
		Ensure PEC are posting precinct level results as set forth by the requirements		Electoral Processes Management Department District Election Commissions	On E-day	Under planning
		Analyse protocols forms, study their intelligibility and establish mechanism for respective actions	The CEC is equipped with data and relevant program in order to identify suspicious trends on e-day	Electoral Processes Management Department	After elections	Under planning
		Secure all electoral materials, at every stage for transport	Relevant procedures/rules are in place	Electoral Processes Management Department District Election Commissions	Completed	Completed
		Review PEC process/forms in regard to international standards relating to accounting all ballots in results protocols	Consensus among the interested stakeholders	Central Election Commission	Completed	Completed
		standards relating to accounting all ballots in	meresteo stakenoidefs	Commission		