Election Administration
Gender Audits – a toolkit

Support to Electoral Reforms in the
Western Balkans, OSCE/ODIHR
Election Administration
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Election Administration Gender Audits – a toolkit

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Designed by Michael Lusaba
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Foreword

Inclusive elections, in which all citizens can exercise their right to vote and be elected, are central to democracy. Among other things, this means that women and men should be able to participate in the electoral process on an equal footing.

Good practice shows that an election administration that integrates gender equality aspects in its work can play an important role in increasing women’s electoral participation.

It is with this aim that ODIHR has developed a toolkit for conducting gender audits of election administrations as part of its Support to Electoral Reforms in the Western Balkans project. The toolkit is a response to ODIHR’s tasking to advance women’s participation in elections and support democratic institutions in progressing gender equality.

Gender audits can be used to analyse the extent to which gender equality issues are considered by an election management body in its activities, both in its internal management, policies, practices and institutional culture, as well as in its work on electoral processes. Close examination of an election administration from this perspective helps to identify ways to improve gender equality and mainstreaming in its work, leading to the development of a gender equality action plan to ensure gender-responsive institutional and electoral management.

Matteo Mecacci
ODIHR Director
# List of Acronyms

<table>
<thead>
<tr>
<th>Acronym</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>CEDAW</td>
<td>Convention on the Elimination of All Forms of Discrimination</td>
</tr>
<tr>
<td>CRPD</td>
<td>Convention on the Rights of Persons with Disabilities</td>
</tr>
<tr>
<td>CSO</td>
<td>Civil Society Organization</td>
</tr>
<tr>
<td>CSW</td>
<td>Commission on the Status of Women</td>
</tr>
<tr>
<td>EMB</td>
<td>Election Management Body</td>
</tr>
<tr>
<td>ICCPR</td>
<td>International Covenant on Civil and Political Rights</td>
</tr>
<tr>
<td>IFES</td>
<td>International Foundation for Electoral Systems</td>
</tr>
<tr>
<td>ILO</td>
<td>International Labour Organization</td>
</tr>
<tr>
<td>ODIHR</td>
<td>Office for Democratic Institutions and Human Rights</td>
</tr>
<tr>
<td>OSCE</td>
<td>Organization for Security and Co-operation in Europe</td>
</tr>
<tr>
<td>SEC</td>
<td>State Election Commission</td>
</tr>
<tr>
<td>ToR</td>
<td>Terms of Reference</td>
</tr>
</tbody>
</table>
Introduction

Background

As a public authority, the election administration should be representative of the wider society. Within its structure, there should be no disparity between men and women or a preponderance of one gender at any level, including in senior positions. The Electoral management body (EMB) has the greatest responsibility for ensuring the inclusive participation of eligible voters in elections.

This toolkit has been developed under the Support to Electoral Reforms in the Western Balkans project, which supports state institutions and civil society in South Eastern Europe in following up on election observation recommendations. Notwithstanding the regional focus of the project, the toolkit is designed to be used widely for assessing the gender-responsiveness of election administrations across the 57 OSCE participating States. It should be read in conjunction with ODIHR handbooks, in particular, the handbooks for the Observation of Election Administration and on Observing and Promoting Women’s Electoral Participation. Its scope and content complement ODIHR guidelines for conducting gender audits of parliaments and political parties across the OSCE region.

ODIHR is specifically tasked with supporting OSCE participating States in promoting, monitoring and reporting on women’s participation in electoral processes and in developing effective measures and good practices for achieving the equal participation of women in democratic processes. Conducting gender audits of EMBs is good practice for ensuring that women and men participate and benefit from the election administration and the electoral processes on equitable terms.

References:

1. ODIHR Handbook for the Observation of Election Administration, 2023 p.25. According to the OSCE Glossary on Gender-Related Terms, “Gender is a term used to describe socially constructed roles for women and men. Gender is an acquired identity that is learned, changes over time, and varies widely within and across cultures.”

2. This paper uses the term election administration as meaning both the institution, i.e., the EMB, or the process, i.e., the organization of an election, as applicable in the context.


4. ODIHR Participatory Gender Audits of Parliaments: A Step-by-Step Guidance Document, OSCE/ODIHR, 16 August 2022; ODIHR’s online Gender Audit Tool targeting political parties.

**Why should an election administration be gender-sensitive?**

As stated in the *Handbook on Observing and Promoting Women’s Electoral Participation*, EMBs “have a critical role to play in promoting women in elections. This includes: having women within their leadership and staff; providing publicly available sex-disaggregated data on the composition of the election administration, voters and candidates; enforcing candidate registration procedures including gender quotas or other affirmative actions; consulting with civil society organizations (CSOs) representing women’s rights; providing awareness-raising and voter education; and promoting measures that can help increase women’s participation as voters and candidates.”

Notwithstanding the need for equal treatment, experience has shown that certain voters may require additional measures to overcome obstacles to their participation in the electoral process. Among these voters are women with disabilities or low literacy, those belonging to national, ethnic, religious and linguistic minorities, young and first-time voters, women with restricted mobility (e.g., those in a medical facility or places of detention), internally displaced persons (IDPs) and refugees, the homeless or those of no fixed abode (when entitled to vote).

A gender-sensitive election administration is in a better position to deliver inclusive elections and facilitate the equal participation of women and men as voters, candidates, observers and election officials. It can identify and respond to the needs, interests, and priorities of women and men, proactively creating an enabling environment for their electoral participation.

EMBs with institutionalized gender policies can positively influence the overall management of the electoral cycle in the long run, including in pre-election, election and post-election periods.\(^6\) In contrast, a gender-blind election administration will be less sensitive to gender norms and roles, to different the needs and power dynamics of women and men taking part in elections, and may — probably unintentionally but quite likely — reinforce gender-based discrimination within the electoral process, its organization and wider policies.

What is an election administration gender audit?

A gender audit supports the EMBs’ commitment to gender equality by assessing the extent to which gender equality is institutionalized from two main perspectives: first the ‘external’ aspect, namely the activities performed by the EMB while administering an election, and second the ‘internal’ aspect, namely the EMB organization itself. The audit assesses how gender aspects are integrated into the EMB’s programmes, projects and services, as well as into its policies, structure and budget. Information from various sources is collected and analysed, and the final audit report presents the good practices, gender gaps and challenges, as well as recommendations on how to improve the gender sensitivity of the election administration.

The audit process must be conducted objectively and impartially. To ensure this, an EMB may choose to have the audit conducted by an independent entity or organization, or by international and/or national experts selected, as necessary, through public competition. Although there is no standard approach, a gender audit of an EMB is best done in a participatory manner — a process that both assesses and encourages consultation among electoral stakeholders and one that promotes continuous development and confidence-building towards practical gender mainstreaming.

In relation to election activities, a gender audit assesses the extent to which the election administration includes the needs, interests and priorities of women and men during the following activities:

- Voter education
- Voter registration, including facilitating access to voting
- Candidate registration
- Oversight of the election campaign and materials
- Vote counting and reporting, and the collection and publication of sex-disaggregated data
- Election dispute resolution

---

7 Gender Budgeting: Practical Implementation, Council of Europe, April 2009.
9 Paragraph 40.13 of the 1991 OSCE Additional Ministerial Meeting held in Moscow commits participating States to “ensure the collection and analysis of data to assess adequately, monitor and improve the situation of women”.
In relation to an election administration’s internal organization, a gender audit assesses to what extent gender aspects are considered in the EMB’s institutional arrangements, including recruitment and staffing, training and capacity-building, and workplace policies and culture.

Any election administration can undertake a gender audit, irrespective of its model or institutional setup. Like any other public institution, any election administration can and should work towards gender sensitivity in its activities and internal organization. The key principles and steps of a gender audit are broadly the same for all election administrations, although different election administration models and national context may require adjustments to the audit tools, questions and electoral stakeholders involved.

Figure 1: An election administration gender audit assesses gender aspects in election activities and the EMB’s internal organization

**Who can use the gender toolkit?**

This toolkit offers practical guidance to election administrations and auditors on how best to prepare for a gender audit, outlining what can be assessed and how to conduct the audit. Founded on OSCE commitments and other international standards, it draws on gender audits ODIHR has conducted in South Eastern Europe and recognized gender good practices from across the OSCE region. It provides constructive and innovative guidance on learning, confidence-building, and follow-up activities towards creating long-term, gender-sensitive EMBs.
As the subject of the audit, the active participation of the EMB is a prerequisite for a successful process.\footnote{There are no specific international standards related to the type or composition of an election administration, nor methods for establishing one. Various election administration models are used across OSCE participating States, including the autonomous model, governmental model and mixed model. As such, an election administration may have different levels including a national level (State or Central Election Commissions), mid-level (Regional, District, Cantonal or Municipal Election Commissions), and polling and counting centres.} There can be no comprehensive gender audit without the EMB agreeing to provide the necessary data, access to election officials and staff, and information about administrative policies, practices and activities.

Several electoral stakeholders will be relevant to a gender audit because they impact, or are impacted by the work and internal organization of the EMB. Stakeholders include the executive, legislature, political parties and candidates, voters and the media. Although these stakeholders are not the primary audience for this toolkit, it does include their roles and how they are relevant to the audit process or the gender sensitivity of the election administration.

The toolkit gives a practical, step-by-step explanation of how to conduct a gender audit, although the timing and sequence of these steps should be flexible to reflect the realities on the ground. It includes checklists, sample surveys and questions, as well as guidance on gender audit reports and action plans for follow-up.

**Step 1** — Preparing for the gender audit — defining the objectives, scope, process, funding, timeframe and selecting the auditors

**Step 2** — Selecting the methodology — research, surveys, interviews, workshops and group discussions

**Step 3** — Identifying the gender aspects — gaps and challenges, good practices and recommendations

**Step 4** — Reporting and presenting audit findings to the EMB and wider audiences

**Step 5** — Mechanisms for following up

From ODIHR’s own experience of running audits, each of the first four steps typically takes up to three weeks. Therefore, a full audit is estimated to take two to three months, depending on the local context. Follow-up should start after the audit is completed and should be a long-term activity.
OSCE commitments and other international obligations and standards relevant to the gender dimension of election administration

The EMB has an important role and often has the legal responsibility to promote, protect and facilitate inclusive elections which, as highlighted in international standards and OSCE commitments, are central to democracy.

The International Covenant on Civil and Political Rights (ICCPR) guarantees the equal rights of men and women to participate in public affairs, to vote and to be elected.\footnote{International Covenant on Civil and Political Rights (ICCPR), UNGA resolution 2200A (XXI) of 16 December 1966, Articles 3 and 25.} The United Nations Convention on the Elimination of Discrimination against Women (CEDAW) requires States Parties to ensure that women can vote, stand for election, hold public office and perform all public functions on equal terms with men.\footnote{Convention on the Elimination of All Forms of Discrimination against Women (CEDAW), UNGA resolution 34/180 of 18 December 1979, Articles 4 and 7.} It also commits States Parties to “embody the principle of the equality of men and women in their national constitutions or other appropriate legislation”. This may include requirements for collecting sex-disaggregated data at all stages of an electoral process. The CEDAW Committee’s General Recommendation No. 23 stresses the importance of not only removing de jure barriers but also achieving de facto equality in public and political life.\footnote{CEDAW General Recommendation No. 23: Political and Public Life, UN CEDAW Committee, 1997, para. 15.} In 2023, the United Nations (UN) Commission on the Status of Women (CSW) clarified the goal of parity by encouraging governments to “strengthen normative, legal, and regulatory frameworks” and set a new international target “to achieve the goal of 50/50 gender balance at all levels of elected positions” through various measures.\footnote{The CSW65 Agreed Conclusions, UN Women, February 2023.} The Council of Europe’s recommendation CM/Rec 2003(3) refers to the representation of men and women in all decision-making bodies in political or public life not falling below 40 per cent.\footnote{Recommendation CM/Rec 2003(3) of the Committee of Ministers to member States on balanced participation of women and men in political and public decision making, Council of Europe, 12 March 2003.}

The 2004 OSCE Gender Action Plan tasks ODIHR to monitor and report on women’s participation in elections and to support participating States in developing effective measures and best practices for women’s participation in democratic processes.\footnote{OSCE Ministerial Council Decision No. 14/04, Article 44d.} OSCE Ministerial Council Decision 7/09 on Women’s Participation in Political and Public Life calls on participating States to consider specific and legislative measures towards gender balance in elected office at all levels and to support research and awareness for identifying...
challenges to women’s political participation and promoting equality of opportunity between women and men.\textsuperscript{17}

Temporary special measures may also be put in place to accelerate the equitable exercise of political power at all levels of political life and public administration. Such measures may apply to the process of administering elections and to the EMB itself.\textsuperscript{18}

\textsuperscript{17} OSCE Ministerial Council Decision 7/09 on Women’s Participation in Political and Public Life, Athens, 4 December 2009, Articles 1, 2, 3 and 8.

Steps for conducting a gender audit of an election administration

Figure 2: Five steps for conducting a gender audit

**Step 1: Preparing for the gender audit**

A gender audit is a recent instrument, increasingly used by public institutions across the OSCE region. Any comprehensive audit can only be done at the request of the institution being audited; this also applies to gender audits and EMBs. EMBs may decide to conduct the audit for various reasons and in different ways. In order to embark on this process, EMBs may need the support of external actors with experience in running gender audits, such as ODIHR, other regional or international organizations, electoral assistance providers, or civil society.

There are several requirements for conducting a comprehensive and efficient audit, including appropriate preparation. This starts with the EMB defining the audit objectives, scope and timeframe, identifying funding, selecting the auditors and facilitating their preparatory work.

19 The ODIHR Support to Electoral Reforms in the Western Balkans project, in collaboration with OSCE field operations, performed pilot gender audits of three EMBs in the region between 2019 and 2023. See also the ODIHR Gender Audit Tool for Political Parties, which has assisted 43 parties in eight OSCE participating States as of end 2023. See Inclusive Electoral Processes: A Guide for Electoral Management Bodies on Promoting Gender Equality and Women’s Participation, UN Women and UNDP, 2015, p. 18; and Gender Impact Assessment: Gender Mainstreaming Toolkit, European Institute for Gender Equality (EIGE), 2016.
Defining the audit objectives, scope, process, funding and timeframe

The EMB should define the audit objectives, i.e., what it aims to achieve with the results of the audit in the long term — for example, to identify routes to gender sensitivity in all its activities, to achieve gender balance in its leadership and staffing, or to harmonize its practices with national gender equality legislation. The EMB should also specify the scope of the audit, defining what specifically is to be assessed — for example, the EMB’s election activities and its internal organization, or just one of these.

The EMB should forecast the budget needed for the gender audit and explore sources of funding, whether from its own resources or from some form of cost-sharing with external partners, such as government gender agencies or international organizations.

The EMB should define how the gender assessment is to be organized in practice. It should appoint one or more gender audit focal point(s). These should ideally reflect a gender-balanced combination of management and operational staff. Their roles and responsibilities should be clearly defined and should focus on helping the audit team, liaising, internally, with the administration and, externally, with electoral stakeholders. The focal points should facilitate the work of the audit team and support document collection, stakeholder contact, interview scheduling, workshop organization etc., without interfering with the audit itself. They should also prepare and advertise the terms of reference (ToRs) for the independent experts/companies that will carry out the gender audit, if applicable.

The EMB needs to consider carefully the timeframe of the audit. It should not be conducted during an electoral period, as it may take time and resources away from the EMB’s key functions and could, therefore, directly or indirectly affect an ongoing or upcoming electoral process and its administration. Engaging an audit partner during an electoral period may also be challenging, as international organizations may not be willing to support at this time, or to combine their election observation activities with election support and assistance work. The immediate period before an election is usually marked by an election campaign and heightened political tensions; these are not conducive to an effective participatory, institutional assessment process such as a gender audit. The audit is best done a few months after an election and/or well ahead of the next election period. This allows the EMB to finalize its post-election tasks (including identifying lessons learned) and to prepare for the audit, while allowing sufficient time to follow up on the audit findings before the next electoral process.
The EMB should also decide how to present the audit findings, whether publicly or only internally, and what follow-up they envisage.

**Figure 3: Audit timeframe**

**Selecting the auditors**

Since an audit must be conducted objectively and impartially by an independent auditor, the EMB should ideally select the auditors through a competitive procedure, in line with applicable tender and procurement procedures. Potential auditors can include independent gender and/or election experts (national and international), gender and/or election researchers, or other experts, companies or organizations that fulfil the ToRs.

An efficient audit process usually requires a team of two or more auditors, combining seniority, thematic expertise (such as gender auditing or election observation), international and national experience, and gender balance. Depending on the scope of the audit and the EMB’s mandate and size, some audit tasks may be done externally, for example, by hiring data analysts, researchers or a polling firm.

**Auditor preparation**

Once selected, the auditors need to carry out certain preparatory tasks. From the outset, this means establishing communication with the EMB and the designated focal point(s) to ensure senior-level commitment. This should start with an introductory meeting, which confirms the practical arrangements, defines and agrees the audit methodology, and proposes a timeline with responsibilities assigned to the auditors, the EMB and its focal point(s). To ensure that the audit runs efficiently, it may be useful to prepare an audit factsheet to be shared with staff, explaining the process and expectations.
Checklist for Step 1: Preparing for the gender audit

1. The EMB decides to conduct a gender audit.
2. The EMB decides on the gender audit objectives and scope.
3. Funding is secured.
4. The EMB decides on the practical arrangements and responsibilities, and appoints its gender audit focal point(s).
5. The EMB and its partners or donors (as applicable) develop the ToRs for the auditors.
6. The EMB decides on the selection process for the auditors, ideally a competitive procedure.
7. The EMB and its partners or donors (as applicable) select the auditors.
8. Communication between auditors and focal point(s) is established.
9. The EMB and the auditors hold introductory meetings, confirming the practical arrangements of the audit.
10. The EMB and the auditors define and agree on the audit methodology.
11. The audit timeline is defined and responsibilities are assigned to the auditors, the EMB and its focal point(s).
12. The auditors prepare an audit factsheet and share it with EMB members and staff.

Step 2: Selecting the methodology

It is the prerogative of the EMB to select the gender audit methodology. The methodology can be set out in the audit ToRs and finalized together with the auditors. Alternatively, potential auditors can be invited to propose a methodological approach as part of the selection process. However it is chosen, the methodology must be defined and agreed upon by the EMB and the auditors before the audit starts.

A participatory gender audit methodology is recommended for assessing EMBs. Traditional audit methodologies look at an institution and its processes and decide whether its results are good or not. In contrast, a participatory audit engages all stakeholders (those directly affected by the work of the institution and those doing the work) in the audit process, applying the results and follow-up. A participatory gender audit methodology focuses not only on assessing critical gaps, but also on identifying good practices and lessons learned, and making recommendations for improving gender mainstreaming not just in theory but in practice.
It is recommended to use a mix of research tools to collect and analyse both quantitative and qualitative data for a deeper assessment of the gender-sensitivity of the election administration’s work and organization. This method combines objective, quantitative data gathered from desk research and an employee survey with detailed, qualitative insights from stakeholder interviews, focus group discussions and workshops. It allows the quantitative results to be verified against the qualitative analysis (and vice versa). It encourages diverse perspectives (from EMB leadership, staff or specific voter groups), helps to validate audit findings obtained from other sources (from the survey or interviews) and, in turn, improves the credibility of the conclusions and recommendations. These consultations should complement and verify the findings of the initial desk research and survey.

Figure 4: Audit tools used in the audit process

However, the gathering and analysis process is rarely linear. For example, information obtained during workshops may prompt the auditors to look into other important documents. The audit tools may be used sequentially or in parallel. The success of the audit and the accuracy of its findings will depend on the auditors verifying and cross-checking all the information effectively.

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21 The gender audit tools referenced in this toolkit are based on the ILO, Manual for gender audit facilitators and are adapted for election administrations and their auditors.

22 Ibid., p. 12.
Depending on the audit objectives, the electoral stakeholders may include:

- The EMB
- Members of parliament
- Party representatives from across the political spectrum
- National gender equality bodies
- International organizations
- CSOs working on elections, political participation or gender equality
- Local election assistance providers
- Election observation organizations
- Different voter groups
- National gender experts
- National election experts and researchers
- The media

Desk research

A thorough review of the documents regulating the work of an election administration should give the auditors objective, quantitative data for cross-checking during consultations with stakeholders. In turn, the document review should also complement the subjective, qualitative findings obtained through the survey, interviews and workshops with stakeholders. The initial review should form the basis for further assessment, analysis and consultation.

The key to successful desk research is to review a balanced selection of documents. The objective is to ensure diversity but limit the number of documents for the sake of efficiency. The EMB should provide the auditors with the requested documents promptly. The auditors should assess the extent to which gender aspects are included in the documents regulating the work of the election administration, exploring whether gender considerations are mainstreamed in the election activities as well as in the internal organization of the administration. When reviewing the documents, the auditors may choose to establish a single assessment criterion: to mark the gender sensitivity of each document or to assess the proportion of documents that are fully or partially gender-sensitive or gender-blind. The results of the document review are usually retained in confidentiality by the auditors to avoid numeric grading or comparison across audited election administrations.
The auditors should prepare a list of the documents they wish to review. These should include:

- Human rights treaties and other international and regional instruments with clauses on gender equality signed and ratified by the participating State
- Legislation regulating the mandate and tasks of the election administration
- The EMB's key programming documents, i.e., strategies, annual work plans, programme or project descriptions and annual reports
- The EMB's internal guidance documents, i.e., statutes, rules of procedure, operational plans, recruitment procedures, training and harassment policies, and budgets
- Gender equality strategies or action plans at the national and administration levels, as well as documents specifically covering gender equality
- Relevant national legislation, such as laws on elections, political parties, election campaigns, public funding, gender equality, labour, anti-discrimination and media in elections
- Election observation reports, including those by the media and local election observation groups or equality organizations

Simple gender marker analysis can help auditors assess documents in a systematic way.

<table>
<thead>
<tr>
<th>The OSCE Gender Marker model uses a three-tier marking system to assess projects or documents²³</th>
</tr>
</thead>
<tbody>
<tr>
<td>Score 0</td>
</tr>
<tr>
<td>Score 1</td>
</tr>
<tr>
<td>Score 2</td>
</tr>
<tr>
<td>Score 3</td>
</tr>
</tbody>
</table>

The findings can be easily collated in a table (see below):

<table>
<thead>
<tr>
<th>Document reviewed</th>
<th>Gender marker score</th>
<th>Good practice and/or gender gap</th>
</tr>
</thead>
<tbody>
<tr>
<td>EMB's Annual report (latest)</td>
<td>0</td>
<td>No sex-disaggregated data or references.</td>
</tr>
<tr>
<td>EMB’s internal training plan (latest)</td>
<td>1</td>
<td>The plan specifies that at least 50 per cent of participants should be women, although there is no consideration for diverse groups of women/men (across departments, seniority, etc.) and no gender training is planned.</td>
</tr>
<tr>
<td>National Strategy for Sustainable Development</td>
<td>2</td>
<td>The strategy mainstreams gender considerations throughout its objectives and includes a dedicated objective on eliminating gender-based discrimination and ensuring full and effective participation of women and equal possibilities for leadership at all levels in political, economic and public life.</td>
</tr>
<tr>
<td>Gender Equality Law</td>
<td>3</td>
<td>Specifies that state authorities (such as election administration) will provide training for employees on achieving gender equality as part of regular professional training offered.</td>
</tr>
</tbody>
</table>

Employee survey

A survey of election administration staff should give valuable insights into how well gender equality is institutionalized in the EMB. The document review should help the auditors to formulate the survey questions. In turn, the survey findings should feed into the topics to be discussed during interviews, focus group discussions and workshops.

When gender auditing the EMB’s activities, the survey should explore whether gender equality aspects are integrated into the EMB’s policies, objectives and programme delivery. It should also look at whether there are specific efforts made to advance gender equality in elections, and whether these are accompanied by a dedicated budget and mainstreaming actions. Importantly, it should also ask about the collection and publication of sex-disaggregated data related to election activities.

When gender auditing the internal organization, the survey should explore employees’ views on gender balance, promotion opportunities and the working environment of the EMB. It should also ask about sexual harassment policies, knowledge about gender issues, internal working groups or focal points tasked with gender mainstreaming and training opportunities on gender equality.
To ensure that the survey produces honest, high-quality data, it should be anonymous and collect only limited personal data, e.g., on gender, age and election administration level (national, municipal or other). Special attention should be paid to reaching employees with different thematic responsibilities and from across all levels of the organization, including central- and mid-level election administration staff and possibly polling board staff, if available. The EMB may have separate categories of staff, with a distinction between political appointees and civil servants, or full-time professional staff and part-time staff employed for a particular electoral cycle, or short-term polling board staff appointed or volunteering for only a few days around elections. The number and content of survey questions should be adjusted to different categories of staff, depending on their responsibilities.

The auditors should develop the survey and share it with the focal point(s) for feedback. If necessary, it should be translated into other official languages. The auditors (not the EMB) should distribute the survey and collect the answers to ensure that responses are anonymous and also perceived to be so.

One simple method for a survey is to do it online. This can be a cost-effective and efficient way to gather anonymous information and opinions, while reaching the largest possible audience. The perceptions and attitudes of the target audience — in this case, the election administration staff — can also be measured by questions with several different, graded answers on offer, beyond the simple Yes/No (e.g., see questions 11, 19 or 20 in the sample survey below). How the survey is run will depend on local conditions; in places with unstable internet access or where the IT skills of staff may be limited, auditors may need to use offline survey methods.

Sample gender audit survey for election administration staff

The election administration of (name of participating State) is undergoing a gender audit from (date) to (date). The aim is to foster the election administration’s gender sensitivity and gender equality in elections and politics more broadly. This survey focuses on assessing gender aspects both in the EMB’s election activities and in its internal organization.

The audit is supported by (donor or partner agency) and is being conducted by an externally commissioned audit team. This questionnaire is anonymous and no personal data will be collected. It contains (number) questions and should take about (time needed for completion, not to exceed 20 minutes) to complete. Please complete it by (submission deadline).

24 A number of online survey platforms (such as Google Forms, for example) offer free, automated data collection and analysis, eliminating paperwork and manual data entry, in turn saving time and resources.
About you:
Your gender: Male. Female. Prefer not to say.

Gender aspects in election activities
1. Is gender equality integrated into your EMB’s policies or objectives? / Yes. No. I am not sure.
2. Does the election administration have a gender equality plan or strategy? / Yes. No. I am not sure.
3. Does the EMB consider gender aspects in its election activities, for example, by conducting voter education for rural women/men voters? / Yes. No. I am not sure.
4. Does the EMB make efforts to promote more diversity in its election activities? E.g., by facilitating the participation in elections of women and men from under-represented groups, such as national minorities or persons with disabilities. / Yes, and I find these efforts sufficient. Yes, and I find these efforts insufficient. No. I am not sure.
5. Can you think of any obstacles to women’s participation in any aspect of the electoral process? / Open question.
6. Is the election administration implementing any specific gender equality projects? E.g., promoting the safety of women candidates / Yes. No. I am not sure.
7. Does the EMB collect and publish sex-disaggregated data on candidates (nominations, elected candidates)? / Yes. No. I am not sure.
8. Does the EMB collect and publish sex-disaggregated data on voters (registered voters, voter turnout)? / Yes. No. I am not sure.
9. Do you have any specific suggestions on what activities, resources or policies could help the election administration work more actively on gender aspects in the electoral process? / Open question.

Gender aspects in internal organization
10. What does gender equality mean to you? / Open answer.
12. How do you perceive the gender balance of EMB employees? / Men in leadership, women in lower positions. Women in leadership, men in lower positions. The positions are balanced. I am not sure.
13. How do you see the promotion opportunities for women and men within the organization? / (Mark all that apply) Benefiting mostly men. Benefiting mostly women. Equal opportunities, independent of gender. It is political. It is merit-based. I am not sure.
14. Do you feel there is a good policy on work-life balance and a working environment that supports all employees in your EMB? E.g., maternity and paternity leave, or flexible working hours? / Yes, there is a good balance and environment. No. I am not sure.

15. Does your election administration have a sexual harassment policy? / Yes. No. I am not sure.

16. Do you know where you could report harassment, for example, sexual harassment? / Yes. No. I am not sure.

17. Are there gender mechanisms in place in your election administration, such as a gender adviser, gender focal point or a gender working group to support work on and knowledge about gender equality? / Yes. No. I am not sure.

18. Is there any budget and resources dedicated to gender equality and gender mainstreaming of your work on elections? / Yes. No. I am not sure.

19. What is your level of knowledge or expertise on gender equality in elections? / Excellent. Moderate. I am not sure. Very little. No knowledge at all.

20. Do you consider you have sufficient skills, tools and techniques to carry out gender mainstreaming in your work on elections? / I have excellent skills. I have sufficient skills. I am not sure. I have few skills. I have no skills at all.

21. Has the election administration given you any training on gender equality or gender mainstreaming in elections? / Yes. No. I am not sure.

22. What is needed for the election administration to be more proactive in advancing gender equality in the electoral process? (Mark all that apply) / Knowledge. Resources. Management commitment. Training. Dedicated gender adviser.

23. Do you have any specific suggestions on what kind of knowledge or training in gender mainstreaming you would find useful? / Open question.

Interviews and focus group discussions

Interviews with individuals who work in, collaborate with, or who are affected by the election administration should give distinct perceptions and valuable insights into how the EMB approaches gender equality in its activities, practices and internal organization. Interviews should complement the desk research and survey findings and should shed light on how the work of election administration may, directly or indirectly, impact diverse groups of women and men, whether EMB staff, candidates or voters. One-on-one interviews usually take place before focus group discussions or workshops, although the group sessions might prompt further interviews with particular stakeholders.

The auditors should prepare a list of interviewees and schedule the interviews, possibly with the support of audit focal point(s). Auditors should aim to interview a reasonably sized sample of EMB employees that is as diverse as possible. EMB interviewees should come from:
• Different election administration levels, including national-, mid-level and polling station staff
• Different levels of seniority, e.g., management and non-management
• Different types of employment contracts — permanent staff, temporary staff and external contractors
• Different departments, e.g., election operations, legal, media, administration, finance and information technology
• Different age groups, geographies, minorities, or language regions for sub-national-level election administrations

External electoral stakeholders should also be consulted. These may include, among others, the parliament and some of its most significant members, networks of women parliamentarians, political parties across the spectrum, national gender equality bodies, election and gender equality CSOs and experts, media representatives and specific voter groups, while ensuring the diversity principle mentioned for EMB staff.

The auditors need to decide whether to hold one-on-one interviews or focus group discussions with stakeholders, bearing in mind the number, diversity and context of potential interlocutors. Individual interviews are generally recommended for politicians and government officials, to avoid the risk of politicized responses and/or politicization of the process, as well as potential issues related to diplomatic protocol and confidentiality. Focus group discussions may be more suitable for consultations with individuals who have similar roles and responsibilities, such as EMB staff, CSOs, media representatives or specific voter groups. This may save time, while also revealing group dynamics and collective experiences.

To ensure efficiency and consistency across interviews, questions should be semi-structured and wide-ranging, allowing an honest exchange of information and discussion, while also eliciting recommendations (see the example below). Not all questions need to be put to each interviewee and questions should be added or adapted accordingly. The interviews should be held anonymously and provide a safe space for interviewees to share their views freely. Focus group discussions can build on individual interviews, addressing people’s experiences.

Interview findings should be recorded systematically, identifying good practices, critical gender gaps and challenges, and recommendations on improving gender sensitivity. The views of certain groups directly affected by the election administration, such as Roma women associations, youth alliances or organizations of persons with disabilities, are likely best collected through focus group discussions.
Gender audit – sample interview questions

Introduction

1. Please provide a brief background on your (or your organization’s) involvement in elections, gender equality or election administration.

2. How do you see the gender dimension of elections in your country?

3. Does the EMB affect the participation of women and men in elections?

4. Have you identified any obstacles to women’s participation in elections, regardless of their role (voter, candidate or election administration staff)? Please elaborate.

Gender aspects in election activities

5. How do you see the work of the EMB in terms of including gender equality considerations in its activities? Can you give any examples?

6. Do you know if there are any sex-disaggregated statistics on voters, candidates and election staff? What do you think the ratio is?

7. Have you noticed any obstacles making it difficult for women to access their right to vote or stand as candidates? Thinking of those obstacles, can you say which are legal, socio-economic or political?

8. Can the EMB do anything to address these obstacles?

9. Are there any special measures for promoting particular groups of women and men as voters/candidates? (e.g., quotas, targeted media campaigns).

10. Does the EMB play a role in ensuring equal access for women candidates in relation to campaigning, finance or media coverage? What could be improved, if anything?

11. How prevalent is the abuse or intimidation of women candidates compared to male ones? Could something be done? Could something be done to decrease it, if needed?

12. Do you have other suggestions about what the EMB could do to increase gender equality in elections and gender sensitivity in its activities?

Gender aspects in the internal organization of the EMB

13. How is gender equality addressed internally, particularly in terms of management, staffing and work environment?

14. How well are women represented in election administration? Too much, equally, too little? At what administrative levels or positions? Please elaborate.

15. Are there sufficient and skills and knowledge within the EMB to ensure gender equality aspects are included in election activities and internally?
<table>
<thead>
<tr>
<th>Question</th>
<th>Answer</th>
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<tbody>
<tr>
<td>16. Does the election administration have a budget for gender-sensitivity efforts, projects or training?</td>
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<tr>
<td>17. Are you aware of any activities that the election administration has implemented to promote gender equality in elections or to encourage women’s participation?</td>
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<tr>
<td>18. Have you had any joint activities with the EMB on increasing gender equality and the participation of women in the electoral process?</td>
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<tr>
<td>19. Is the current model of election administration — i.e., the method of nominating and appointing members and of selecting management and staff — efficient in terms of advancing gender equality in elections? What can be improved?</td>
<td></td>
</tr>
<tr>
<td>20. What could be done better to give the EMB the knowledge and commitment to work towards gender sensitivity?</td>
<td></td>
</tr>
<tr>
<td>21. Do you have any other recommendations on how to strengthen the gender sensitivity of the election administration, both in terms of election activities and its internal organization?</td>
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**Workshops**

Workshops are usually the final tool used in gender audits, after the desk research, individual interviews and focus group discussions have finished. Workshops allow the auditors to discuss and verify their initial findings and let the group analyse and build a consensus around those findings and recommendations. Workshops are not only a way to get further information for the audit report, but also a good way to engage stakeholders in the audit, supporting individual, group and institutional ownership of the process, the findings and follow-up work.

Workshops should facilitate a group discussion among EMB employees and could also include external stakeholders. In general, workshops should be inclusive, but they must ensure a safe environment for participants to express their views freely and to work together on recommendations and the methods and necessary actions to implement them. For example, for the sake of inclusiveness, the auditors may plan to invite EMB employees, donors and civil society to a workshop. However, this combination may inhibit EMB staff from sharing possible gaps and weaknesses in their gender practices with external partners. Likewise, EMB staff may also not feel comfortable speaking openly about their working environment in front of outsiders. To ensure that workshops are successful, the auditors will have to identify and balance the mix of workshop participants (perhaps holding separate working groups to ensure safety and confidentiality) and carefully select the agenda topics to encourage an open and constructive exchange.
Checklist for Step 2: gender audit tools

1. The auditors prepare and submit the list of documents needed for the desk research.
2. The focal point(s) collect and send the documents to the auditors.
3. The auditors systematically assess the documents for gender considerations, possibly by using a gender marker model.
4. The auditors develop and distribute an employee survey, online if possible.
5. The auditors collect and analyse the results of the survey.
6. The auditors compile a diverse range of interviewees, including EMB employees and external stakeholders.
7. The auditors prepare a set of questions for the interviews and focus groups, and adapt them as needed.
8. The auditors (and focal points, if needed) schedule the interviews.
9. The auditors conduct the interviews and record the findings, looking at good practices, gaps and recommendations.
10. The auditors (and focal points, if needed) schedule and organize the focus group discussions with larger or more diverse groups, or for those with similar roles and responsibilities, such as CSOs, the media, or specific voter groups.
11. The auditors run the focus group meetings and record their findings, looking at good practices, gaps and recommendations.
12. The auditors (supported by the focal points, if needed) schedule and organize the workshops with specific categories of stakeholders, encouraging information exchange and ensuring a safe environment.
13. The auditors run the workshops and record the findings, looking at good practices, gaps and recommendations.

Step 3: Identifying gender aspects in election administration

The goal of a gender audit is to assess the gender aspects of an election administration and identify ways to institutionalize them in the administration's activities and organization. With sufficient preparation and the gender audit tools in place, the auditors are now ready to identify good practices and gender gaps and to make recommendations on improving the gender sensitivity of the EMB.
3.1 Assessing gender aspects in election activities

A gender audit of election activities assesses the extent to which the administration considers the different, gender-based needs, interests and priorities of women and men voters when delivering voter education, voter registration and facilitating voting access. The audit also looks at the candidate registration process, assessing how the procedures might impact the access of women and men candidates differently. It also examines the administration’s role in overseeing the election campaign and campaign finance, including from the perspective of addressing violence against women in elections.

Voter registration and turnout

Voter registration is key to ensuring the equal and universal participation of all eligible voters — women and men — in an election. Registration should be based on the principles of transparency, accuracy and inclusiveness. While there is a wide range of voter registration systems in use across the OSCE region — from passive ones, to those requiring active efforts by individual voters to register — any system should help new, inactive or vulnerable people access the vote. The procedures should not disadvantage any eligible voters or further marginalize them from taking part by, for example, having overly complex registration procedures.

25 The voter register is usually a permanent database, extracted from a civil or population register and maintained by the responsible state authorities, e.g., the interior ministry. Some OSCE participating States task the election administration with compiling and/or reviewing voter registers and preliminary voter lists; see the Handbook for the Observation of Voter Registration, OSCE/ODIHR, 13 July 2012.
The gender audit should assess to what extent the EMB facilitates inclusiveness and the right to vote for diverse groups of women and men during voter registration. If the EMB is in charge of maintaining the system, the audit assesses:

- To what extent diverse groups of people are aware of ways to register or update their voter registration in the system;
- Whether the EMB takes any special measures to facilitate voter registration of diverse groups; and
- Whether the EMB collects and publishes sex-disaggregated data on voter registration and voter turnout.

If the EMB is not responsible for the voter register, the audit should assess whether the EMB actively advocates for such gender-sensitive measures, for example, by calling for legal reforms, publishing opinions or information, or holding consultations with those responsible for the register.

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**Auditors’ points of inquiry**

1. **If the EMB is responsible for voter registration, has it ensured that the registration process facilitates inclusiveness and the right to vote for diverse groups of women and men?**

2. **Has the EMB removed any unduly complex registration procedures which may marginalize men or women from particular groups, for example, by requiring complex identification documents from Roma and Sinti or internally displaced persons?**

3. **Does the EMB assess to what extent women and men from diverse groups are aware of how to register or update their registration in the system and does it monitor registration and take remedial action, if the group is under-registered?**

4. **Does the EMB take any special measures to facilitate the voter registration of diverse groups, e.g., information campaigns targeting minorities, women with low literacy or men voters, or special registration procedures for vulnerable groups such as first-time women voters in places of detention?**

5. **If EMB-maintained, does the voter register contain sex-disaggregated data? Is the gender breakdown of registered voters and voter turnout published in a timely and easily understandable manner?**

6. **In addition to sex-disaggregated data, is the EMB able to extract other data from the register, such as a voter’s age and place of residence, in order to identify under-representation or more active participation of certain groups of women and men?**

7. **Are EMB-run voter registration centres accessible to both women and men in terms of: their location, facilities, safety and opening hours, allowing access at times that fit work and family responsibilities? Do they ensure that illiterate people, those with children, persons with disabilities or the elderly can register to vote?**
8. Are voter registration staff trained in gender sensitivity, to facilitate the registration of specific groups, e.g., illiterate women or persons with disabilities?

9. If the EMB is not responsible for the voter register, does it advocate for gender-sensitive voter registration, for example, by advocating for legal reforms, publishing opinions or information, or collaborating with those responsible for the register; civil society or the media?

Candidate registration and vote count

EMBs are generally tasked with registering election candidates. While women and men have equal rights to stand for election, low levels of participation by women are particularly evident in elections across the OSCE region; ODIHR election observation recommendations commonly highlight challenges with registering women candidates.26 Certain categories of women and men may face disproportionate obstacles in registering as candidates; for example, a requirement to deliver supporting signatures personally to the central EMB office in the capital city may be difficult for women candidates from remote areas or for candidates with disabilities.

Depending on the electoral system, political parties, coalitions, groups of voters or independent candidates submit candidate lists or single-mandate candidates to the EMB. The EMB verifies the nominations against a set of legal criteria and publishes the list of names of registered candidates, usually disaggregated by party but, frequently, without a gender breakdown. Among the legal criteria used by EMBs for candidate registration, legislative gender quotas for parliamentary elections are in place in at least 25 OSCE participating States at the time of writing.27

The gender audit assesses to what extent the EMB ensures that no aspect of the candidate registration process prevents certain groups of women or men candidates from registering. It looks at whether the EMB publishes sex-disaggregated data on registered candidates, as well as on vote count and results tabulation, in a timely and easy-to-understand manner. It examines how the EMB reviews candidate lists for compliance with any gender quota requirement, the measures it takes against lists not complying with the quota requirement, and whether it takes proactive steps to educate staff and political parties ahead of elections about gender quotas, giving them training and clear guidelines on verifying and registering candidate lists.

27 International Idea’s Gender Quotas Database.
Auditors’ points of inquiry

1. Does the EMB adequately enforce any legislative gender quota requirements in a timely manner, at all levels of the election administration and as prescribed by the law?

2. Does the EMB educate its staff about gender quotas, giving them training and clear guidelines on verifying candidate lists in line with the quota requirement?

3. Does the EMB educate political parties and contestants about gender quota requirements ahead of the candidate registration process?

4. Has the EMB examined possible challenges with candidate registration for certain groups of candidates, such as women or men from remote areas or those with disabilities?

5. Does the EMB take legal steps against lists that do not comply with the legal requirements on gender quotas?

6. Does the EMB publish sex-disaggregated data on registered candidates promptly and in an easily understandable format?

7. Does the EMB publish the vote count and election results in a sex-disaggregated manner, indicating the number and percentage of women and men who voted, as well as elected candidates, by party, electoral district and municipality?

Election campaign, campaign finance

While electoral contestants run their campaign, EMBs can play both advocacy and oversight roles in steering the campaign towards gender sensitivity, including online. The oversight of election campaigns and campaign finance is largely the mandate of EMBs or other institutions, such as anti-corruption agencies, and aims to ensure a level playing field not only for parties but also between women and men candidates. Directly or indirectly, various aspects of a campaign can affect women and men candidates and voters differently. For example, young women candidates may be less aware of campaign rules, women may have less access to campaign finance, voters with disabilities may not understand campaign materials produced in standard format only, and minority women candidates may experience disproportionally higher levels of violence in elections.28

28 While anyone can be the target of violence in elections, evidence shows that women, particularly those from a minority background, are more often targeted by electoral violence, online violence and smear campaigns (see Addressing Violence against Women in Politics in the OSCE Region: Toolkit, OSCE/ODIHR, 27 November 2022). See also Handbook for the Observation of Election Campaigns and Political Environments, OSCE/ODIHR, 14 October 2021, p.36: “Electoral violence usually refers to acts or threats of coercion, intimidation, or physical harm carried out to exact impact on the electoral process or competition. Women candidates and voters, under-represented groups, including national minorities, but also certain categories of professions such as journalists and human rights defenders can be especially vulnerable and susceptible to risk. These risks can include physical or psychological violence, including cyber-bullying; sexist or other derogatory comments; and different forms of intimidation. In order to understand electoral violence, it is important to consider its possible root causes, which may include deep-cutting societal and political divisions; the history of political violence; the high-stakes nature of elections; human rights concerns; weak state institutions; poverty; socioeconomic inequality; and corruption.”
Some EMBs require or encourage contestants to make their campaign programmes, messages and materials in formats which are appropriate, accessible and easy to understand by women and men of different ages, backgrounds, language skills and abilities. Some OSCE participating States have specific requirements for a portion of the state funding for the election campaign received by political parties to be dedicated to the promotion of women candidates, and this is monitored and sanctioned by EMBs as part of campaign finance oversight. Some EMBs actively engage in making election campaigns more gender-sensitive and violence-free, for example, by cooperating with the legislature, political parties, the media, civil society and candidates to raise awareness and prevent violence through codes of conduct signed by political contestants, or by facilitating safety measures for at-risk candidates.

Auditors’ points of inquiry

1. Does the EMB play an active role in educating and informing different categories of men and women candidates and voters about election campaigns and campaign finance, for example, through dedicated training sessions for young women candidates?

2. Does the EMB require or encourage election contestants to make their campaign programmes, messages and materials in formats that are appropriate, accessible and easy to understand by people of different ages, backgrounds, language skills and abilities?

3. If tasked with campaign finance oversight and when the law earmarks public funds specifically to women candidates, does the EMB adequately monitor whether women candidates receive their allocated campaign funds, and does the EMB efficiently sanction non-compliance, as prescribed by the law?

4. If it doesn’t have oversight, does the EMB play a role in promoting more gender-sensitive and violence-free election campaigns, for example, by cooperating with political parties, candidates, the media, civil society and other stakeholders to raise awareness about the violence experienced by diverse groups participating in elections?

5. Does the EMB actively prevent violence against women in elections, for example, by encouraging political contestants to sign codes of conduct, or by organizing safety measures for at-risk candidates, such as minority women or persons with disabilities?

Voter education

Most EMBs are, to varying degrees, tasked with providing information on and educating voters about elections, their voting rights and ways to realize them. Voter education is key to informing voters about how they can register to vote, who the contestants are and what platforms they are running on, as well as how and where to vote. When planning voter education programmes, EMBs should recognize that the term ‘voter’ is a broad concept, and includes women and men in all their diversity, such as young or first-time voters, rural or illiterate people, individuals with disabilities or minorities. International good practice suggests that EMB education programmes targeting specific voters, such as first-time women voters or voters from national minorities, can promote electoral participation.30 For example, first-time rural women voters — typically under-represented — can be targeted with tailored messages through a dedicated campaign encouraging them to register.

The gender audit should assess to what extent EMB-run voter education programmes are informed by past sex-disaggregated data on voter registration and turnout. It should explore whether the EMB assesses and plans for the specific educational needs of diverse groups of voters, for example by conducting surveys, focus group discussions, or consultations with specific voter groups or gender experts. It examines how well the EMB’s voter education programme targets and informs different groups of voters, for example, by running tailored campaigns encouraging young women to vote, or by delivering messages to women from rural areas on the privacy of the vote. It also assesses voter education materials and activities, by seeing if they are delivered in a variety of formats and languages to reach diverse voter groups, for example, minority voters, or those with disabilities. As voter education campaigns can be expensive, the audit also explores whether there is dedicated EMB budget for voter education for diverse groups.

The gender audit assesses how active the EMB is in educating diverse groups of candidates and voters about the election campaign and campaign finance rules. It explores whether the EMB requires or encourages political contestants to publish their campaign materials in different formats, accessible to diverse groups. It examines if the EMB adequately monitors whether women candidates receive their state-allocated campaign funds, as prescribed by the law, and if this is ensured, for example, through specific reporting requirements.

**Auditors’ points of inquiry**

1. *Does the EMB collect sex-disaggregated data on past voter registration and turnout to support the planning of voter education programmes?*

2. *Does the EMB assess the distinct educational needs of diverse groups of voters, for example, minority groups or women with low literacy?*

3. *Does the EMB consult specific voter groups or gender experts when planning voter education?*

4. *Are EMB-run voter education programmes tailored for and targeted at specific groups of voters, and do they include bespoke campaigns and messages?*

5. *Are EMB’s voter education materials and activities delivered in a variety of formats and languages to reach specific groups of voters, for example, minorities, voters with disabilities, those with low literacy, rural, young or first-time voters?*

6. *Is there dedicated EMB budget for tailored voter education programmes for diverse groups of women and men?*

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**The media**

Media coverage of candidates is important, both quantitatively in the proportion of coverage of women and men and, qualitatively, in the balance of the issues covered, their format and impact. Women candidates across the OSCE region report that media treatment is often a disincentive to stand for election, due to challenging coverage, which, for example, focuses on their appearance, suggests their political career leads to neglect of their families, or questions their ability to undertake political roles.31 Oversight of media coverage during election campaigns is often assigned to an independent media regulator and less frequently to EMBs. However, EMBs can still play an active role in raising awareness about the media regulator and media outlets, and about gender-sensitive election campaign coverage, exploring if there is fair and balanced coverage of women candidates, as well as women’s issues during the campaign.32 EMBs often collaborate with the media to promote women’s electoral participation and encourage gender-sensitive campaign coverage.

The gender audit assesses to what extent the EMB is actively monitoring or promoting gender-sensitive media coverage of elections. The audit should explore whether the EMB oversees the gender sensitivity of the media coverage of elections (if it is mandated to do so), looking at gender-sensitive coverage of women and men candidates, equitable media access for candidates or the inclusion of gender equality topics in election coverage. If the

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EMB is not tasked with media oversight, the audit will look at whether the EMB is working with the media regulator or media outlets in raising awareness about gender-sensitive media coverage of elections, for example, by arranging for the media to sign up to codes of conduct on gender-sensitive reporting.

**Auditor’s points of inquiry**

1. If tasked with media oversight and mandated by the law, does the EMB monitor the gender sensitivity of election coverage and sanction non-compliance effectively?

2. Does the EMB actively raise awareness about media regulators and media outlets in terms of gender-sensitive election coverage, equitable media access for women and men candidates, and the inclusion of gender equality topics in election coverage?

3. Does the EMB encourage media outlets or journalists towards gender-sensitive reporting, possibly by introducing a code of conduct for media on gender-sensitive election coverage?

**Voting access**

The way the EMB ensures voting access for diverse groups of women and men is a measure of its efficiency and, more broadly, of democracy. The features of polling stations can impact how easily men and women voters of different backgrounds, age, language skills, literacy level or abilities are able to exercise their right to vote.

The gender audit should assess how well the EMB ensures voting access for all voters. It explores whether the locations, opening hours, layout, physical accessibility, organization and safety measures, together with the identification and voting procedures, enable voters of different backgrounds, language skills or abilities to exercise their right to vote, or rather hinder it. The audit explores whether the EMB has ensured that polling station staff are aware of the gender aspects of voting access and practices, particularly in terms of family voting, for example, by including this topic in training programmes. It looks at whether the EMB has considered priority voting access for certain categories of voters, such as pregnant women and those with children, the elderly or persons with disabilities. It assesses whether the EMB has planned for voting assistance by polling station staff, as prescribed by the law, for those voters needing support. Lastly, it explores whether the EMB has considered and addressed any security concerns of particular groups of voters, identified, for example, during consultations with voter groups or with civil society.
**Auditor's points of inquiry**

1. *Does the EMB actively improve and ensure voting access for diverse groups of women and men, those with children or of different background, age, language skills, literacy level or abilities?*

2. *Does the EMB consider gender aspects when planning and organizing polling stations, including their locations, opening hours, layout, physical access, and safety measures? Does the EMB consider how identification and voting procedures might affect specific groups of voters?*

3. *Does the EMB train polling station staff on gender aspects of voting access and practices, such as group or family voting, which is largely detrimental to the secrecy of women's vote?*

4. *Does the EMB consider priority voting access for certain categories of voters, such as pregnant women and women with children, the elderly or persons with disabilities?*

5. *Does the EMB plan for voting assistance by polling station staff, as prescribed by the law, for those voters needing support?*

6. *Does the EMB consider and address any security concerns of particular groups of voters?*

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**Election dispute resolution**

While political parties may generally be aware of election dispute resolution procedures, access to justice is often more difficult for women voters and candidates, due to their limited access to information, movement restrictions (in some countries) and persistent gender-based discrimination.\(^{33}\) The EMB can play a key role in raising awareness among those participating in elections about election dispute resolution procedures, whether they are voters, candidates or election administration staff. The election administration may observe irregularities concerning particular groups, including, for example, difficulties with identifying certain groups of voters at a polling station, repeated proxy or family voting, the resignation of women or minority candidates, or similar.

The gender audit assesses to what extent the EMB is actively raising awareness about election dispute resolution procedures among election participants, whether voters, candidates or election administration staff. It evaluates whether the EMB is also providing support to specific groups of voters, or to candidates who want to file a complaint. It also explores whether the EMB sees any irregularities concerning particular groups of participants, and the measures it takes, if any, to resolve these. It should also collect sex-disaggregated data on individuals filing complaints.

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### Auditors’ points of inquiry

1. **Does the EMB actively raise awareness among diverse groups of voters, candidates and its own staff about election dispute resolution procedures, for example through campaigns or dedicated training?**

2. **Does the EMB explore gender aspects of the election dispute resolution process, looking at gender-specific irregularities and sex-disaggregated data on disputes?**

3. **Does the EMB provide information, advice or support to specific groups of women or men voters or candidates who want to file a complaint or an appeal, particularly to those with special needs?**

4. **Is there a gender balance and gender knowledge within the various bodies dealing with election disputes (as far as these are within the remit of the EMB)?**

### 3.2 Assessing gender aspects in the internal organization of an election administration

A gender audit reviews from a gender perspective not only the election administration’s activities but also its internal organization, capacity and culture. When the internal organization of an election administration is gender sensitive, this supports not only knowledge about gender and a good working environment for all employees, but also establishes a strong foundation for gender-sensitive external activities.

#### Institutional arrangements

The institutional set-up, or model, of an election administration can significantly impact its ability to proactively pursue a gender-sensitive agenda or gender mainstreaming internally and in its activities. Political pressure, lack of institutional capacity (including due to rotating, politically-appointed members), unclear or deficient legal provisions, insufficient budgets or staff, or lack of institutional independence can easily influence its ability and commitment to implementing gender sensitivity. Whatever the setup, an election administration should do its best to work towards gender sensitivity internally and externally. A gender-blind organization can only deliver gender-blind services, to the detriment of electoral participation and, more broadly, democracy.

The gender audit assesses how well gender equality considerations are mainstreamed in the EMB’s strategic and policy documents, and whether there are dedicated gender equality strategies or tools available to address differing gender needs and ensure that all employees can participate in and benefit equally from the election administration’s activities and organization. It evaluates whether gender equality objectives and sex-disaggregated indicators are included in the administration’s annual work plans, budgets
and reporting. It assesses whether the EMB keeps consistent track of its gender equality and mainstreaming objectives through a dedicated gender equality strategy and/or action plan.

To strengthen gender-mainstreaming efforts, the election administration should ideally develop a dedicated action plan for gender equality and mainstreaming in all its election activities and internal organization. This should include clear objectives, responsibilities and targets and set out the personnel and financing necessary for implementation. The action plan should be developed in consultation with all levels of the election administration and relevant partners, including from the civil sector, in order to facilitate ownership and implementation.

**Auditors’ points of inquiry**

1. *To what extent is gender included in the development of the administration’s objectives, strategies, policies, programmes, projects or services?*
2. *Does election activity planning and budgeting consider gender aspects to respond to the differing needs, interests and priorities of women and men, or to ensure equitable access to the activities, their benefits and impacts?*
3. *Are gender equality objectives and sex-disaggregated indicators included in the administration’s regular/annual work plans, budgets and reporting?*
4. *Is there a dedicated gender equality strategy and/or action plan to support the election administration in tracking progress on its gender equality and gender mainstreaming objectives?*
5. *Is there accountability within the administration for gender mainstreaming and gender sensitivity?*
6. *Is the election administration model conducive to gender sensitivity and what could be improved?*

**Management, recruitment and staffing**

A gender-sensitive administration should lead by example, demonstrating gender equality and balance at all levels. While gender equality does not stop with quantitative representation, gender balance is one of the preconditions for substantive representation and a good indicator of gender equality. Here, questions about recruitment procedures, appointments and promotions play a key role, although these decisions are often beyond the EMB’s remit. Legislatures and political parties are usually responsible for appointing EMB members and certain categories of staff, and this is usually based on a complex set of political considerations. Although gender considerations for appointments to public
institutions are often set out in gender equality laws, in practice they are frequently ignored in favour of political considerations.

While election management is often perceived as a political process, an EMB is tasked with delivering well-organized, technically competent, efficient and inclusive elections. This requires a cadre of full-time, long-term professionals, appointed for their skills and expertise. In addition, the gender balance of the professional staff, if not all staff categories, is crucial for ensuring gender equality and gender sensitivity.

The gender audit should assess to what extent the election administration’s management is aware of and committed to gender sensitivity, and how hard it works to ensure gender balance at different levels of the election administration. It looks at whether comprehensive reporting procedures are in place to ensure that the EMB reports on gender composition at all levels. This is necessary because sex-disaggregated data on EMB staffing is not collected or published systematically and comprehensively across the OSCE region. The audit evaluates whether recruitment and staffing policies and procedures improve the gender balance across staff categories and at all levels, and whether there are staff members responsible for working on gender equality, internally and in election activities.

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**Auditors’ points of inquiry**

1. **Is the management of election administration aware of and committed to gender sensitivity?**

2. **Does the EMB collect and publish data on the gender breakdown of its staffing at different levels?**

3. **What is the gender balance within staff categories across departments, services and different levels of responsibility?**

4. **Do recruitment procedures, appointments and promotions promote gender balance?**

5. **Are there any dedicated staff members responsible for working on gender equality or women’s issues internally and in election activities?**

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34 Over the last decade, ODIHR’s election observation reports have included 20 recommendations to 15 OSCE participating States regarding the collection and publication of sex-disaggregated data and improvement of gender balance in election administrations. See ODIHR’s electoral recommendations database with search indicators years 2013-2023, thematic areas of election administration and participation of women.
Staff knowledge, capacity and training

The gender sensitivity of an election administration depends largely on its leadership and the awareness and ability of staff to understand and incorporate gender aspects into election work. This can be improved with regular training and support. Gender audits conducted by ODIHR show that many election administration staff are broadly aware of gender equality issues, but they need deeper understanding of how gender equality is relevant to election administration work.

There are understandable variations in EMBs’ knowledge of gender equality issues, but gender sensitivity is often incorrectly reduced solely to issues around women’s participation. It must be emphasized that gender equality is a human right for all; a gender-sensitive election administration delivers better access, services and impact for all voters, candidates and election staff.

The gender audit assesses the overall level of awareness, expertise and gender equality competence of the EMB at various levels, looking into staff knowledge about gender issues relevant to the technical and operational areas of their institution and the election process. Specifically, it evaluates whether different categories of staff have a good understanding of the concept of gender equality, how it relates to the work of the EMB and how it can be incorporated into its daily operations. It also looks at whether there is the organizational capacity — dedicated training and in-house expertise — to promote and improve staff expertise on gender equality and mainstreaming.

**Auditors’ points of inquiry**

1. How is gender equality perceived in the election administration?
2. Do EMB staff feel that gender equality aspects are important to their work?
3. Do staff feel they have adequate knowledge about and capacity to include gender aspects in their work?
4. Do staff feel supported in including gender aspects in their programmes?
5. Is there any gender network or expertise available within the EMB to support staff with gender sensitivity?
6. Does the EMB offer any regular training on gender equality and mainstreaming to different staff categories?
Working environment and culture

One indicator of a gender-sensitive working culture is the policy on work-life balance. This should promote a working environment that supports women and men employees equally, for example, with maternity and paternity leave, flexible working hours and promotion opportunities.

It goes without saying that a gender-sensitive working environment and culture requires a working environment free from sexual harassment. Most OSCE participating States have legislation that covers gender equality, gender-based discrimination, bullying or sexual harassment at work, mainly in their gender equality, anti-discrimination or labour laws. However, most EMBs do not appear to have a dedicated policy on sexual harassment, instead relying on laws that apply to all public institutions or employers. When organizations, including EMBs, have no mechanisms for reporting and sanctioning sexual harassment, it may lead to under-reporting of incidents and, ultimately, to a culture of impunity.

The gender audit assesses whether EMB staff perceive that the organization’s policies promote a positive work-life balance and a safe working environment. It evaluates whether there is a sexual harassment policy in place and if EMB staff are aware of it. It also examines whether the policy has clear reporting and remedial mechanisms and if this is handled by independent, gender-balanced and gender-sensitive staff members, to avoid any sense of discrimination or impunity in cases of reported sexual harassment.

**Auditor’s points of inquiry**

1. Do the EMB staff feel that their working environment is gender-sensitive, promoting an inclusive and safe work culture and good work-life balance?

2. Does the EMB have a sexual harassment policy? Are staff aware of it?

3. Is there a clearly established and gender-sensitive reporting and remedial process for sexual harassment complaints?

**Step 4: Reporting and presenting the audit findings**

After gathering all the data, background information, examples of good practice, gender gaps and recommendations, the audit team should present their findings in a report.

The report should cover the audit objectives and process, outline the methodology and tools, present the identified gaps and good practices and make specific recommendations for improving gender sensitivity in both of the key areas of assessment — the EMB’s
election activities and its internal organization. The report should be concise, evidence-based, constructive and forward-looking. The objective is not to criticize, but to seek and recommend solutions.

The auditors should discuss the report findings with the EMB in advance, while preserving their key conclusions. This process requires a delicate balancing act, to ensure that all the findings are properly verified without affecting the objectivity of the findings. It is good practice to share a draft with EMB management and staff, either in writing or during a workshop, to allow the EMB to check the facts and provide feedback.

Transparency is a key principle for effective election administration. Stakeholders and the general public should be able to see how their EMB works. It is important to consider whether the audit report will be made public (fully, partially or not at all), weighing the risks of exposing any shortcomings against the benefits of transparency; providing information on the work and practices of public institutions is prescribed in most OSCE participating States. It may be appropriate to share the full version of the audit report with a selected group of EMB leadership and stakeholders, and publish an executive summary for the general public and other partners. The final decision should support the objective of the audit — to improve the gender sensitivity of the election administration.

**Example gender audit report structure**

**Executive summary, including key findings and recommendations**

1. Introduction
2. Gender audit methodology and tools
3. Gender audit findings
   3.1 National context and normative framework on gender sensitivity in elections and election administration
   3.2 Gender aspects in the activities of election administration, including voter education; voter registration, turnout and vote count; candidate registration; election campaign, campaign finance and violence in elections; the media; voting access and election dispute resolution
   3.3 Gender aspects in the internal organization of election administration, including institutional arrangements; management, recruitment and staffing; staff knowledge, capacity and training; working environment and culture
4. Conclusions and follow-up

Annexes: sample audit tools, survey results, list of interviews, workshop agendas, documents reviewed, etc.
Step 5: Follow-up

Conducting a gender audit should not be an end in itself. Rather it should be the first step on the road to continuous assessment, education and improvement towards a gender-sensitive election administration. The information on the gender patterns of the election administration gathered during the audit can form the baseline against which future progress is measured. The audit can be repeated regularly, for example, after each election, to record progress and encourage further improvements.

To ensure that the audit findings are followed up, the EMB should consider developing a gender action plan. This should address the identified gaps and respond to the audit’s recommendations. The gender action plan should include the baseline data from the audit, identify concrete objectives and assign tasks, responsibilities and timelines for action. The EMB management should lead on the development of the plan, with the involvement of staff and electoral stakeholders, to ensure ownership and sustainability. It is recommended to create a gender task force (perhaps during discussions about the audit report) to safeguard the process. This should be followed by planning sessions to identify priority actions to complete within set deadlines. To ensure the sustainability of the planning phase, it is important to set clear and achievable goals, define clear activities, apportion responsibilities and ensure resources are available. Regular monitoring and evaluation should identify areas for improvement.

To ensure that other work priorities do not sideline the gender action plan, gender should be integrated into the organization’s overall strategy. A gender action plan should form the basis of a continuous cycle of monitoring, reporting and external consultations to achieve long-term improvements in the gender sensitivity of the EMB and the broader electoral process.

36 Ibid.
38 Ibid.
Sample Gender Action Plan: excerpts from the 2021 Gender Action Plan of North Macedonia’s State Election Commission (SEC)\(^{39}\)

<table>
<thead>
<tr>
<th>Activity/measure</th>
<th>Result/indicator</th>
<th>Initial status (June 2021)</th>
<th>Activity holder</th>
<th>Time frame</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Strategic goal 1: Integration of gender aspects in the internal functioning of the SEC</strong></td>
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<tr>
<td><strong>Area 1.1. Internal structure for gender equality integration</strong></td>
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<tr>
<td>1.1.1 Introduction of a permanent working group for coordination of gender promotion</td>
<td>Functional working group established</td>
<td>An Equal Opportunities Coordinator appointed</td>
<td>The members of the SEC; Secretary General; Employees in professional service; Mediator for protection against harassment in the workplace; Coordinator for equal opportunities for men and women.</td>
<td>March 2022</td>
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<td></td>
<td>Document on competencies of the group, annual plan and operative budget adopted</td>
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<td>Regular monthly meetings held</td>
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<tr>
<td><strong>Area 1.2. Policies on gender mainstreaming at the institutional level</strong></td>
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<tr>
<td>1.2.3 Revision of the Strategic Plan of the SEC 2021-2024</td>
<td>Gender aspects integrated into all strategic goals of the SEC</td>
<td>Gender aspects are not integrated into most of the SEC’s strategic goals</td>
<td>Members of the SEC; Coordination Body on Gender Equality.</td>
<td>February 2023</td>
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<tr>
<td><strong>Area 1.3. Gender sensitization of the human resource management system</strong></td>
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<tr>
<td>1.3.1 Develop procedures for work-life balance</td>
<td>Work-life balance procedures developed and adopted</td>
<td>Work procedures are gender neutral</td>
<td>Members of the SEC; Secretary General; Coordination Body on Gender Equality; Independent department for human resources management; Potential partner: Assembly of the RNM</td>
<td>2023</td>
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<tr>
<td></td>
<td></td>
<td>The SEC has not developed or adopted procedures for balancing work responsibilities with private life</td>
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<tr>
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<tr>
<td><strong>Strategic goal 1: Integration of gender aspects in the internal functioning of the SEC</strong>&lt;br&gt;Area 1.4. Gender Awareness through Gender Equality Education</td>
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<tr>
<td>1.4.1 Develop a training programme and plan for SEC members and staff, with a focus on gender equality</td>
<td>A training programme for SEC members and staff was developed and adopted, with a focus on gender equality</td>
<td>No education and training programme for gender equality at the SEC level</td>
<td>Members of the SEC; Department of Education and Coordination; Coordination Body on Gender Equality;</td>
<td>June 2022</td>
</tr>
<tr>
<td><strong>Strategic goal 1: Integration of gender aspects in the internal functioning of the SEC</strong>&lt;br&gt;Area: 1.5. Internal mechanisms for reporting gender-based discrimination</td>
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<tr>
<td>1.5.2 Development and implementation of training for dealing with cases of sexual harassment for mediators</td>
<td>Module, plan, and training materials developed</td>
<td>No training in recognizing and dealing with cases of sexual harassment in place</td>
<td>Members of the SEC; Mediator for protection against harassment in the workplace; Coordination Body on Gender Equality.</td>
<td>2023</td>
</tr>
<tr>
<td><strong>Strategic goal 2: Integration of gender aspects in the external functioning of the SEC</strong>&lt;br&gt;Area: 2.1. Tools for providing gender-disaggregated election process statistics</td>
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<tr>
<td>2.1.1 Collection and publication of gender-disaggregated statistics at all stages of the election process</td>
<td>Gender-disaggregated statistics published for all phases of the election process and all participants (voters, candidates, elected representatives, EB and MEC members)</td>
<td>Gender-disaggregated statistics are not being published</td>
<td>Members of the SEC; MEC members; EB members.</td>
<td>Continuously across every election process</td>
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<td><strong>Strategic goal 2: Integration of gender aspects in the external functioning of the SEC</strong>&lt;br&gt;Area: 2.2. Education on the electoral rights of citizens from a gender aspect</td>
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<tr>
<td>2.2.1 Preparation of intersectional analysis to identify barriers to participation in the election process from a gender perspective</td>
<td>The methodology developed and intersection analysis conducted</td>
<td>To date, no analysis has been made incorporating an intersectional approach to identify obstacles to women’s participation in the election process</td>
<td>Members of the SEC; Coordination Body on Gender Equality.</td>
<td>2024</td>
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<tr>
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<tr>
<td><strong>Strategic goal 2: Integration of gender aspects in the external functioning of the SEC</strong></td>
<td><strong>Area: 2.3. Gender equality in communication</strong></td>
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<tr>
<td>2.3.1 Preparation of a communication strategy for gender mainstreaming in the SEC election activities</td>
<td>Communication strategy for gender mainstreaming in the SEC election activities developed</td>
<td>The SEC does not have a communication strategy for integrating gender aspects into the SEC election activities</td>
<td>Coordination Body on Gender Equality; Department of Education and Coordination.</td>
<td>2024</td>
</tr>
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</table>
Conclusions

The EMB and their auditors need to keep in mind that, while a gender audit is designed to be a detailed, objective assessment, its aim is not to criticize but to make EMBs and, in turn, the elections they manage, more gender sensitive. The audit should assess the current gender sensitivity of the election administration, highlight good practices and gaps and make recommendations for improvement. Each step of the process should contribute to finding effective solutions.

Requesting a gender audit indicates an EMB’s commitment to gender equality, but the results could bring criticism if they expose gaps and vulnerabilities alongside the good practices. A successful gender audit process should bolster the integrity of an EMB and help it transform weaknesses into strengths.

‘What isn’t counted, doesn’t count’, goes the saying. Understanding the gender aspects of the electoral process requires targeted and systematic collection of sex-disaggregated data. The gaps, challenges and effective solutions will only be identified if there is a sound base of evidence, deep gender analysis and a frank exchange on good practices. Sex-disaggregated data is the key to effective policies for gender sensitivity.

Systemic mainstreaming works best when using what is known and improving upon it. Understanding gender aspects within EMBs and electoral processes, and finding ways to improve understanding, practices and policies, will deliver results. Systemic gender mainstreaming is best done by setting down the desired change in a dedicated gender action plan and assigning the necessary objectives, responsibilities and resources to achieve it.

The gender audit of an election administration can also help with establishing partnerships and identifying partnership-based solutions. It should be seen as an opportunity for cooperation between the EMB, stakeholders, partners and beneficiaries, as well as for consensus-building and raising awareness about the need for joint efforts towards gender-sensitive election administration and inclusive elections. Real and sustainable change towards gender-sensitive elections requires effort, support and political will not only from EMBs but also from many others, including legislators, political parties, candidates, voters, and national and international partners.