



HIDDEN CAMPAIGNS

UNCAC Resolution 11/7 and the Integrity Challenge of Third-Party Political Spending

In a landmark moment of international consensus, the Conference of State Parties (CoSP) to the United Nations Convention against Corruption (UNCAC) adopted [Resolution 11/7](#) in Doha in December 2025.

This resolution established the first global standard on political finance integrity and transparency (see IFES's [Quick Reference Guide](#)). While the resolution sets forth a range of measures for countries to consider when reforming and implementing their regulatory and enforcement regimes, Operating Paragraph (OP) 9 introduces a breakthrough provision addressing the issue of third-party campaigning. By including this provision, the resolution goes beyond most regional standards, calling for dedicated attention to third parties and regulating their role in election campaigns.

This IFES Issue Brief looks at why third party campaigners (“non-contestant campaigners”) matter and how they are currently regulated. It then offers some important considerations for strengthening legal and enforcement frameworks on third party campaigning.

Why do third parties matter?

In election oversight and political finance integrity circles, third parties are often dubbed “non-contestant campaigners,” a term that more precisely captures their role. As non-contestant campaigners, third parties are not formally affiliated with registered candidates, political parties, or coalitions in an election, yet they still campaign to influence voters at the ballot box.

They can include a range of domestic actors, including civil society organizations, advocacy groups, private individuals, social media influencers, businesses, as well as foreign entities.

While the exercise of political rights (such as freedom of speech and expression) in electoral processes is a legitimate democratic activity, these rights can also be exploited for malign purposes, posing serious threats to election integrity. This is especially evident in political finance, where regulations aim to ensure transparency, accountability, and a level playing field.

Yet third parties are often under-regulated or not regulated at all, creating opportunities to exert undue influence over campaign discourse and enabling electoral contestants to circumvent the law by funneling money through third parties. This is especially the case when wealthy donors or special interest groups direct outsized contributions to third-party campaigns to bypass legal limits on official campaign spending and donations.

At the same time, third parties offer a convenient vehicle for foreign actors to interfere through domestic proxies. A [2020 study](#) published by the Alliance for Securing Democracy found that third parties were a common feature of covert foreign political financing schemes, including through the use of straw donors, non-profits, and online political advertising.

Third parties can wreak extensive damage on an electoral process and on citizen trust in elections. Recent elections in Europe demonstrate the scale of impact, especially in the context of foreign interference.

In Moldova’s 2025 parliamentary elections, a [BBC report](#) uncovered an online troll farm that facilitated a coordinated network of accounts and posts on TikTok linked to Russian-affiliated third parties. The campaign reached more than 55 million users and spread disinformation about Moldova’s pro-European party, including manipulated poll results portraying it as unpopular.

In neighboring Romania, a Constitutional Court decision [annulled the 2024 presidential elections](#), claiming that foreign-linked third parties orchestrated an inauthentic TikTok campaign in favor of candidate Călin Georgescu, while Georgescu himself declared no expenses in official campaign finance reports. These developments have further called into question how democracies can protect elections against illegitimate third parties, and what regulations may be best suited to accomplish that goal.

The limits of existing regulations

A growing number of countries have introduced regulations on third-party campaigning, including Canada, Czechia, Ireland, Latvia, and the United Kingdom (UK). These regulations typically include targeted measures to enhance transparency and prevent circumvention of political finance rules, such as registration requirements, limits on donations and campaign expenditures,

Intelligence (AI)—that obscure funding origin, rapidly disseminate manipulated content online, and evade detection by overburdened and under resourced investigators.

Notably, the overlap between regulations on third-party campaigns and online political advertising complicates the design of effective oversight and enforcement regimes. While OP9 of UNCAC Resolution

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reporting and disclosure obligations, and, in some cases, rules on online political advertising or coordination with registered candidates.

Regulations have thus far varied widely in scope and effectiveness, with many initial adopters still in the early stages of evaluating implementation. Enforcement gaps identified to date are often tied to shortcomings in the legal framework. This includes the lack of clear definitions and commensurate sanctions, as well as limited resources and independence granted institutions charged with oversight. At the same time, it has been a challenge for regulators to determine what are protected forms of freedom of expression by civil society versus circumvention or interference from political entities and/or malign foreign actors. In the early 2020s, this has been exacerbated by new technologies—especially cryptocurrencies and Artificial

11/7 is explicitly related to third parties, OP10 encourages countries to require online advertising companies to report on advertisement sales.

However, OP10 does not include any specific language to bring transparency to source of funds or tracking advertisements across platforms and sponsors, allowing third-party spending on political advertisements to proceed without scrutiny.

Despite this gap, the European Union (EU)'s [Transparency and Targeting of Political Advertising Regulation \(TTPA\)](#), among other measures, mandates the creation of a repository for political advertisements across the EU. However, the complexity of the TTPA led major platforms Google and Meta to [announce the suspension](#) of online political

advertising shortly before it entered into force. Moreover, due to new transparency policies introduced by Google and Meta following the TTPA, advertisement libraries are no longer easily accessible, even though social media campaigning appears to continue in practice across the EU.

How are countries regulating third-party campaigning?

The UK extensively regulates third-party campaigning, with the UK Electoral Commission (UKEC) requiring any “non-contestant campaigner” to register when spending more than £10,000. This registration requires third parties to

do not infringe upon freedom of expression.

Meanwhile, in Canada, third-party campaign regulations have progressed since 2018 to better insulate the electoral process from undue influence, setting forth registration requirements, capping spending during elections, and requiring extensive and detailed financial reporting. The Canada Elections Act also obliged online platforms to publish a digital advertisement registry, with full authorizer disclosure and electronic copies of all advertisements as they appeared on the platform.



adhere to spending limits and publicly report on their activities. The UKEC uses a criteria-based “[purpose test](#),” to determine if a third party’s activities constitute campaigning based on: 1) call to action, 2) tone, 3) context and timing, and 4) reasonable perception.

In Czechia, regulators have introduced a broad set of requirements for third parties to comply with registration obligations, spending limits, and financial reporting, as well as opening campaign accounts for proper scrutiny. Even so, balanced enforcement is a challenge — [a 2024 decision](#) by Czechia’s Supreme Administrative Court underscored that regulations must be weighed so that they

In July 2025, Montenegro joined the growing number of countries that include third-party campaigning rules in their political finance legislation. Under these rules, any third party planning to spend more than €1,000 to conduct a campaign during the election period is required to open a dedicated bank account, notify the Agency for Prevention of Corruption (APC), and submit both an interim and final financial report.

In addition, spending is capped at €10,000, and foreign actors, public institutions, state-owned enterprises, and individuals without the right to vote in the country are barred from running third-party campaigns. With the support of British

Embassy Podgorica, IFES worked alongside legal reformers to design some of these provisions and helped the APC prepare new [by-laws](#) and [guidelines](#) on third-party campaigning. While the effectiveness of these regulations will be clearer following Montenegro's 2027 parliamentary elections, some of the anticipated challenges relate to legal loopholes on explicitly defining third-party campaign

electoral, and socio-cultural context, to help ensure that rules can be effectively implemented and enforced. Important considerations include:

1. Legal and Regulatory Actors: Are third parties clearly defined in the law? Are requirements proportionate and comparable to those on electoral contestants? Do they oblige disclosure on

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activities, verifying source and permissibility of funding, coordinated activity with electoral contestants, and sanctions available for violations.

Strengthening Regulations

Drawing on emerging lessons learned from where regulations have been tested, there are important considerations on what kind of measures can strengthen legal and enforcement frameworks on third-party campaigning, including:

- definitions of third-party campaigning;
- thresholds for registration and reporting;
- funding source disclosure and labelling requirements (especially for online political advertisements);
- donation and spending limits; and
- oversight and enforcement by an independent institution.

In general, regulations should result from a comprehensive stakeholder consultation process, specific to each country's political,

funding sources, costs, and dissemination? Are regulations balanced to ensure no chilling effect on legitimate civic participation? Is an independent institution responsible for oversight and resourced to carry out this function? Are sanctions defined and sufficiently deterrent?

2. Oversight and Enforcement Bodies: Has a risk assessment been conducted to inform oversight approach? Are practical monitoring mechanisms in place, with data available to oversight actors?

3. Civil Society and Media: Can advocacy campaigns help ensure regulations are effectively designed and enforced? Are civic oversight tools and monitoring methodologies integrating third-party campaigning issues? How can investigations better uncover undisclosed or opaque third-party campaign activities? What formal reporting mechanisms can be used to flag violations? Are oversight and enforcement bodies effectively carrying out control of third parties?

4. International Community: What practical and legal guidance from comparative cases can be used to shape reform and implementation? Are technical assistance initiatives in place to guide legal/regulatory actors, oversight and enforcement bodies, and civil society and media? What cross-border or international fora exist to trace foreign-backed third-party campaigning?

At IFES, our programs supporting political finance integrity and compliance with UNCAC Resolution 11/7 are guiding stakeholder groups to responsibly consider the threat third-party campaigning poses in their respective

countries, as well as how to design and implement smart regulations based on global comparative experience. This is especially true in countries where foreign interference in elections is a significant risk to democratic resilience, as third parties are often instrumental in channeling malign influence from foreign actors.

As Resolution 11/7 is further socialized across UNCAC State Parties, IFES will collect good practice and assess trends to inform evaluation efforts and better align implementation with the experience of stakeholders working to address third-party campaign challenges at the local level. ■

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