

Victorian Electoral Commission

Electoral Integrity Framework

June 2023

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1 Introduction

1.1 Electoral integrity and why it matters

Electoral integrity is a key foundation of a strong democracy.

A strong democracy needs the public to trust and have confidence in the processes and systems through which its leaders are elected. Without trust in election results, instability can ensue, social cohesion is weakened and the accountability of government to the electorate is limited.

Electoral integrity aims to achieve trusted and legitimate electoral outcomes. While there is no universally accepted definition for the complex concept of electoral integrity, suggestions have ranged from the *absence* of fraud, malpractice or misconduct in elections to the *presence* of positive attributes in electoral administration such as impartiality, accuracy and transparency.¹

The diversity of concepts of electoral integrity indicates that it is not solely the role of the electoral management bodies to deliver electoral integrity. A complex network of democratic participants each play a part in delivering trusted and legitimate electoral outcomes, including political parties, candidates and the media.

The Victorian Electoral Commission (**VEC**) contributes to electoral integrity as the administrators of the Victorian electoral system, in delivering impartial, transparent and legitimate electoral outcomes. Ultimately, all electoral participants contribute to electoral integrity and share responsibility for achieving trusted and legitimate electoral outcomes.

2 The electoral integrity framework

2.1 Vision

This framework outlines how the VEC manages and monitors its contribution to electoral integrity through its commitment to all Victorians actively participating in their democracy.

The VEC believes that acceptance and legitimacy of electoral outcomes is enhanced when there is widespread active participation across the electoral system. Widespread active participation is itself enhanced when there is trust and belief in the legitimacy of the electoral system.



¹ Norris P (2018) Electoral Integrity. In: Fisher J, Fieldhouse E, Franklin MN, et al. (eds) The Routledge Handbook of Elections, Voting Behavior and Public Opinion. Abingdon: Routledge, pp.220–231, Kofi Annan Foundation (2012) Deepening Democracy: A Strategy for Improving the Integrity of Elections Worldwide, The Report of the Global Commission on Elections, Democracy and Security. September 2012. Published by the Kofi Annan Foundation.

In this way, the VEC's electoral integrity framework is two-fold: our electoral integrity contribution is both *what* we deliver (services to facilitate widespread active participation) as well as *how* we deliver it (building trust).

Electoral participation is more than voting at elections; it includes enrolling and maintaining one's enrolment, nominating as a candidate, forming a political party, giving or receiving political donations, being a scrutineer, making a submission on electoral boundaries, or disputing an election result.

2.2 Goals

Active participation in democracy is achieved when people:

- can participate
- will participate
- do participate.

In other words, participation in democracy requires *opportunity, intention and supports*.

As the administrators and regulators of the *Electoral Act 2002* (Vic) (**Electoral Act**) and other Victorian electoral law, the VEC plays an essential role in enabling these 3 aspects of participation.

2.3 Core objectives

We have identified 6 core objectives that underpin active democratic participation and that are the focus of our electoral integrity contribution. These are:

1. promoting enrolment
2. reducing barriers to participation
3. motivating participation and promoting respect for electoral law
4. fostering public trust in the VEC's services and electoral systems
5. developing knowledge of how, when and where to participate
6. delivering systems, tools and processes that enable free and fair participation.

There are numerous activities that we deliver to support each core objective. These are explained below in '**3 Delivering electoral integrity**'.

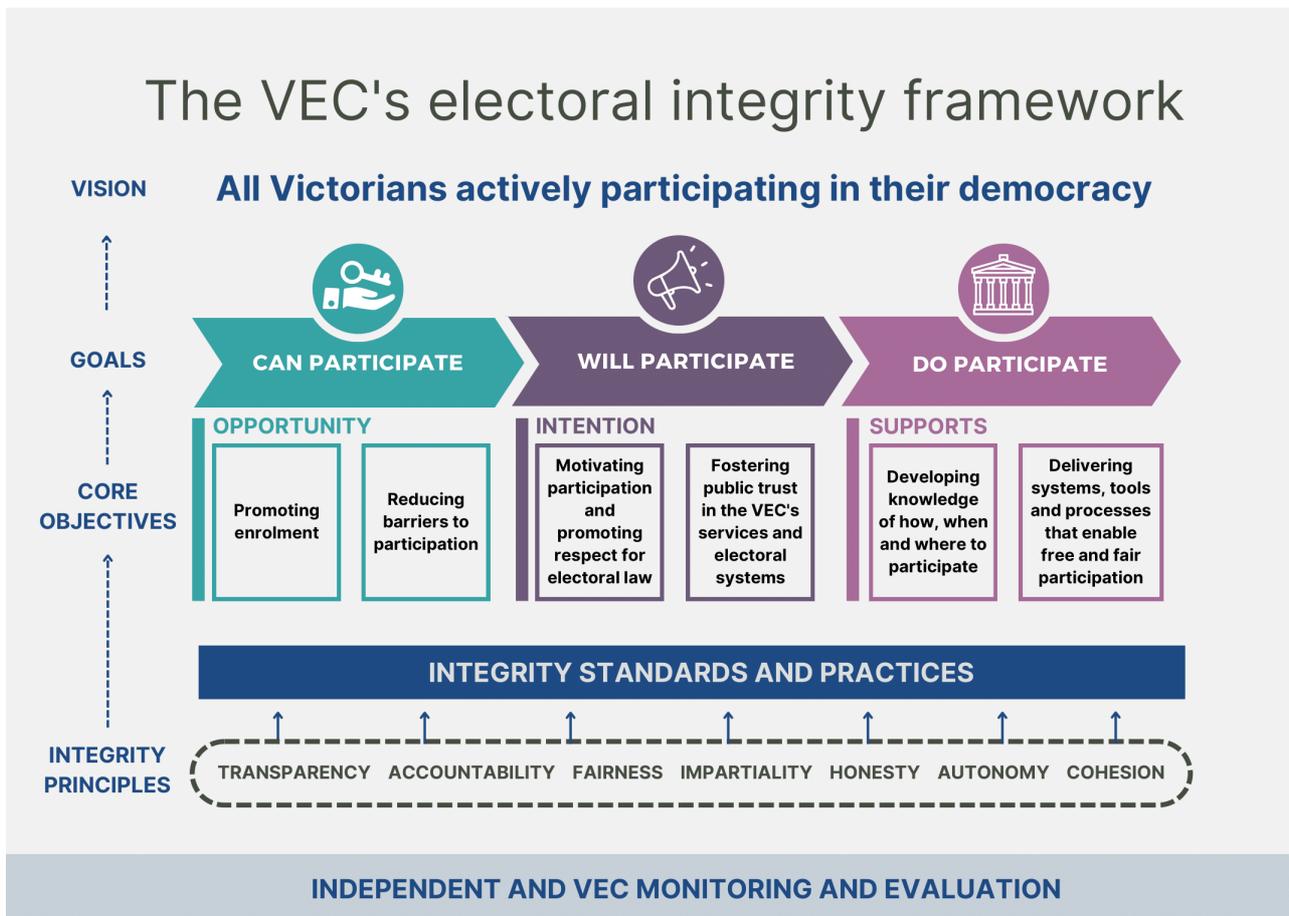
2.4 Integrity principles

We are equally guided by integrity principles in our conduct. Integrity principles orient us towards better integrity outcomes across all our functions and duties by establishing standards and practices for integrity in how we perform our work. Demonstrating these principles builds trust in the VEC and greater transparency for Victorians on how the electoral system is delivered. The integrity principles and standards are described in '**4 Demonstrating electoral integrity**'.

'5 Monitoring electoral integrity' explains the activities we undertake to measure our success in achieving electoral integrity outcomes, both through the delivery of core integrity objectives and demonstration of integrity principles.

Finally, '6 Electoral integrity beyond the VEC' highlights how other democratic participants contribute to electoral integrity and can affect Victorians' active participation in democracy. Ultimately, electoral integrity is a shared responsibility.

2.5 Figure 1: The VEC's electoral integrity framework



A diagram of the VEC's electoral integrity framework, which shows how the VEC delivers electoral integrity through the 3 elements of active participation and their core objectives, and how the VEC demonstrates electoral integrity through integrity standards, practices and principles. The whole framework is supported by monitoring and evaluation.

3 Delivering electoral integrity

The VEC delivers electoral integrity through a range of activities designed to facilitate and maximise fair and free participation. The Electoral Act enshrines the critical functions which the activities support.

3.1 Promoting enrolment

The VEC strives to make enrolment as simple as possible for Victorians. These practices maximise Victorians' inclusion on the electoral roll, which ultimately advances our aim of universal participation in representative democracy. As we believe that 'every vote counts', we equally believe that 'every enrolment counts'.

3.1.1 Direct enrolment

The *Constitution Act 1985 (Vic)* outlines who is eligible to enrol to vote in Victorian elections. The VEC aims to ensure every eligible elector is accurately recorded on the register of electors so they can easily participate in elections.

The VEC partners with the Australian Electoral Commission (**AEC**) to share enrolment information and streamline enrolment for Victorians. The VEC also has information-sharing schemes with other public bodies to automatically enrol and update enrolment details on behalf of electors.

The VEC also manages an online 'Check my Enrolment' portal, making it convenient for Victorians to check and update their enrolment details.

3.1.2 Multiple enrolment options

The VEC offers various options for Victorians to enrol to vote, such as online, in person, during community outreach sessions and at voting centres. Eligible Victorians who are not yet registered to vote in Victoria can still participate in an election. We provide the means of casting a vote while also checking the elector's enrolment eligibility.

3.1.3 Maintaining accurate electoral enrolment information

The VEC employs a range of initiatives to maintain the integrity of the electoral roll. These initiatives are aimed at ensuring information on the electoral roll is as accurate as possible, including updating names and addresses, adding new electors and removing people that are no longer eligible to vote in Victoria.

Having accurate enrolment data is fundamental for the delivery of many other electoral activities. Enrolment data informs electoral boundary reviews, planning the locations of voting centres based on population and voter demographics, which electors are eligible to become a general postal voter and many other matters.

In partnership with the AEC, we minimise divergence between the federal electoral roll and the Victorian register of electors and ensure errors are corrected.

3.2 Reducing barriers to participation

The VEC is passionate about increasing the accessibility of the electoral system for all Victorians. The VEC uses a range of techniques to reduce barriers to participation and equip voters with a range of accessible formats and tools to participate in democracy.

3.2.1 Advisory committees

The VEC is guided by 5 advisory groups that represent priority communities, including Aboriginal and Torres Strait Islander peoples, people experiencing homelessness or in prison, people with disabilities, people from culturally and linguistically diverse backgrounds and young people aged 10 to 29. These advisory groups support the VEC to be accountable to underrepresented communities and ensure that our decisions and processes are held to a satisfactory standard in a way that allows all Victorians to actively participate in their democracy.

3.2.2 Education programs

The VEC runs education programs with priority communities to increase awareness about democracy and educate community members on key election themes, such as why voting matters, how to enrol and what to do if you didn't vote. The programs provide information in a range of languages and formats and include both in person and online education delivered using a peer to peer model. This includes recruiting and training of community members as paid Democracy Ambassadors to deliver education sessions along with developing resources in consultation with stakeholders, which are both relevant and accessible e.g. Easy English guides, in-language videos, train the trainer materials etc. Education sessions are delivered in the community, including in prisons and in aged care facilities.

The VEC's education programs are informed by extensive research into levels of voter turnout, informality rates and demographic changes so that we can focus on communities with lower participation rates.

3.2.3 Multiple voting channels

The VEC provides multiple voting channels to ensure that all electors are able to vote in ways that suit their needs. This includes providing early voting, postal voting, assisted voting at voting centres, mobile voting and telephone assisted voting. Primarily for interstate and overseas voters, the VEC also provides downloadable postal voting applications and digital voting options, minimising ballot paper delivery time. The VEC has designed the delivery of these voting options to meet the needs of different communities while ensuring voting is secure, secret and reliable.

3.3 Motivating participation and promoting respect for electoral law

As the electoral management body for Victoria, the VEC is uniquely positioned to motivate participation in Victorian democracy. The VEC is committed to encouraging Victorians to understand the value of democratic participation and respect electoral law.

3.3.1 Public engagement

The VEC engages with a variety of electoral participants to encourage engagement and foster interest in Victoria's democracy. We maintain active communication and engagement with stakeholders using proactive media, newsletters, social media and the website.

Our communication aims to raise awareness of Victoria's democracy and instil public trust in Victoria's electoral system to promote participation. Importantly, this communication also provides electoral participants with equal access to electoral information, protecting fairness and impartiality.

In August 2022, the VEC published its Reputation Management Strategy, aimed at proactively managing the VEC's reputation by understanding the context, audiences, stakeholders and issues and responding with contextually appropriate strategic communication. This strategy supports increased involvement in the electoral system by promoting a positive experience of participation,

maintaining confidence in the VEC as an impartial and independent umpire and increasing awareness of the democratic process.

3.3.2 Legislative reform

We believe that intention to participate is also facilitated by a fit-for-purpose electoral system. The VEC conducts a continuous evaluation program that monitors public expectations and experiences of the electoral system and considers ways to improve its services. The VEC actively explores innovative options to make its services contemporary and accessible and implements new ways of delivering services each election.

As part of this evaluation program, the VEC makes recommendations to the Victorian Parliament for legislative reform where data and evidence identify necessary improvements to legislation. Recommendations for legislative reform are backed by detailed analysis of electoral statistics, comparative jurisdictional research and feedback from key stakeholders such as voters, candidates and political parties. The recommendations advocated by the VEC note our aim of promoting an electoral system that is aligned with public expectations, and where the VEC may currently be limited in its ability to meet contemporary voter expectations.

3.3.3 Enforcing the Electoral Act

Perceptions of corruption or malpractice can lead to lower electoral participation as voters' display apathy, distrust or cynicism.² In this way, regulation of the Electoral Act increases public trust in the electoral system and can have positive effects on motivation to participate in democracy.

The VEC is responsible for managing and monitoring compliance with the Electoral Act. The VEC applies a constructive compliance approach to regulating the Electoral Act, which includes providing education and guidance to promote compliance.

Offences in the Electoral Act aim to protect the electoral process from deception, tampering, interference and improper influence, and reinforce a free, open and fair electoral environment. By regulating conduct and enforcing compliance, the VEC safeguards election outcomes and sends the message that the integrity of the electoral environment is paramount.

The VEC's online complaints portal makes it easy for members of the public to report apparent non-compliance. The VEC also employs a range of measures to detect non-compliance, including thorough processes, analysis and audits. This proactive and responsive approach provides greater protection of Victoria's democracy.

As part of its regulatory function, the VEC administers Victoria's political funding and disclosure scheme through a public political donation disclosure system, VEC Disclosures. This system provides transparency about political donations made for or by Victorian political entities. This information provides voters with insights into the nature and extent of support given to Victoria's political entities and provides further resources to engage with and understand Victoria's democracy.

In October 2022, the VEC published our regulatory approach to provide clarity to electoral participants about how we perform our regulatory function. The approach transparently outlines our constructive compliance responses and provides resources to understand and comply with regulatory obligations. Where a person or organisation fails to comply with their obligations,

² S. Dhalberg and M. Solevid (2016). *Does corruption suppress voter turnout?*, Journal of Elections, Public Opinion and Parties: Vol 26, No 4, pp: 489-510.

compliance action is taken proportionate to the VEC's assessment of harm, in line with a risk-based regulatory style

3.4 Fostering trust in the VEC's services and electoral systems

Trust in the VEC's services and systems is critical to achieving high levels of democratic participation and resilient electoral outcomes. The VEC fosters trust through a range of practices that strengthen our transparency, impartiality and provide independent scrutiny of our operations.

3.4.1 Reporting on our performance

As a public body that operates independently of government, there may be a risk that the VEC is perceived to be less accountable for the way it performs its duties. For this reason, transparency is a key priority for the VEC, and an important way of building public trust in Victoria's electoral administration.

Prior to delivering major election events and State by-elections, the VEC publishes a service plan explaining how the election event will be delivered. The aim of the publication is to build knowledge and understanding of the electoral process and set expectations for the event. The service plan also provides a mechanism through which electoral participants can assess the VEC's performance and maintain an understanding of, and confidence in, delivery of open and fair elections.

Following a major election event, the VEC publishes an election report detailing the work and outcomes achieved. The report allows for public scrutiny of the VEC's administration of the election and provides transparency on results. It also allows electoral participants equal access to information about the VEC's performance.

Election reports are tabled in Parliament, allowing parliamentary oversight of the VEC's performance.

For State elections, the VEC also publishes independent evaluation reports, which provide perspectives of the VEC's service delivery from different electoral participant cohorts including voters, candidates and parties.

The VEC also reports to Parliament's Electoral Matters Committee (**EMC**) on a range of electoral matters. The EMC and the VEC share interest in improving the experience of Victorians through the electoral system. The EMC provides scrutiny of the VEC's performance and makes recommendations to improve how electoral functions are delivered, including opportunities to improve the governing legislation. The inquiries conducted by the EMC are an important mechanism for the VEC and Parliament to identify issues affecting the electoral system and for EMC to make recommendations for appropriate remediation.

Lastly, the VEC's corporate strategy provides transparency of the VEC's culture, values and priorities and alongside the organisation's annual reports outlines how and what the VEC will focus on and achieve each year.

3.4.2 Staff disclosure of political activities

VEC employees, appointees and contractors are required to complete a satisfactory disclosure of their political activities prior to their engagement.

The VEC has the lawful power to discriminate against a person in relation to offering employment or appointment based on political activity. The VEC can choose not to employ or appoint a person based on their political activities if it is likely or possible that their activities could compromise the VEC's actual or perceived independence and impartiality.

Disclosures of political activities enable us to ensure that all staff are – and are seen to be – politically neutral and impartial in the conduct of their duties. Political bias or perceived political bias can compromise public trust and confidence in the VEC’s independence and impartiality. Impartiality is also an ongoing obligation of all Victorian public sector staff as outlined in the *Public Administration Act 2004 (Vic)* and VEC employees and contractors are bound by the Code of Conduct for Victorian public sector employees of special bodies.³

While the VEC doesn’t publish individual disclosures for privacy reasons, the guidelines for assessment of disclosures of political activities and information about impartiality measures are available from the VEC website.

3.4.3 Misinformation register

The VEC maintains a misinformation register on the website to counter false or inaccurate information about elections and provide reliable information to the public.

The misinformation register supports the public to develop skills to critically assess information about elections. While the VEC does not regulate truth in political advertising, the misinformation register can assist and remind voters to sort fact from fiction.

The operation of the misinformation register reduces the impact of false or inaccurate information and positions the VEC as a reliable independent umpire of the Victorian electoral environment within its regulatory bounds.

3.4.4 Quality assurance practices

The VEC uses checklists and other quality assurance practices in its work to ensure decisions meet legislative requirements, and to advance an objective and consistent, treatment of electoral participants.

Checklists are made available to electoral participants to provide transparency of the VEC’s services and expectations. For example, the candidate nomination checklist assesses whether a nomination is compliant with the legislative requirements and supports fairness and impartiality by ensuring all nominations are subject to the same standards.

Other quality assurance activities include audits, user testing, risk assessments and reporting, which equally help support consistent, transparent, fair and accountable administration.

The VEC is also audited by the Victorian Auditor-General’s Office (**VAGO**) and reports to an audit and risk committee made up of independent advisors. The audits ensure the VEC is upholding the law, achieving its objectives effectively and efficiently and exercising governance and risk management practices in line with public sector standards.

3.4.5 Scrutineer observation

The role of scrutineers in observing voting and counting processes is an important transparency feature of elections that contributes to the confidence of the public in the outcome of elections. Details of their role are outlined at 6.3 Scrutineers. The VEC actively supports the involvement of scrutineers in fostering trust in the accuracy and fairness of the election results.

³ Code of Conduct for Victorian public sector employees of special bodies (2015). Victorian Public Sector Commission. Published by the Victorian Public Sector Commission.

3.5 Developing knowledge of how, when and where to participate

The VEC presents information in a wide range of formats to so that electoral participants can access the information they need to participate when and how they would like.

3.5.1 Online resources

The VEC publishes a range of handbooks, guides, videos and resources to assist electoral participants to understand how the VEC administers and regulates the electoral landscape and facilitates engagement with Victoria's democracy. These resources cover a range of topics including how voting works, enrolling to vote, being a candidate in an election, the role and responsibilities of a scrutineer and disclosure of political donations.

The VEC's handbooks and guides also assist those who have obligations under electoral law by explaining key legislative requirements, describing processes and providing forms and templates. We also deliver timely reminders to electoral participants in tailored communications when key obligations are due.

Educational resources can be downloaded from the VEC's website and relevant handbooks are available in hard copy from election offices during election events. Communications are in plain English and translated into high priority languages, to make them accessible for more Victorians. Where possible, we also produce easy English versions of key information.

3.5.2 Information sessions

Apart from the outreach sessions described under **3.3.2 Education programs**, the VEC also runs information sessions with candidates and political parties to help them understand how to participate in the election. These sessions cover key topics such as how to nominate, how to appoint scrutineers and detailed information about their electoral obligations.

3.5.3 Information alerts

During elections, the VEC conducts extensive communication campaigns to raise awareness of the election and provide the public with information critical to their participation. This includes disseminating election information through print, broadcast and digital media, outdoor advertising, direct marketing and the VEC's VoterAlert SMS and email reminder service. The campaigns are aimed at raising awareness and engagement with key dates such as close of roll, close of nominations, opening of voting and close of voting.

3.5.4 Determinations

We publish determinations which outline how we administer specific aspects of electoral legislation. Determinations provide transparency about how the VEC will perform its responsibilities and functions, or exercise powers under the Electoral Act.

Publishing determinations is in line with our regulatory approach, referred to above at **3.3.3 Enforcing the Electoral Act**. Determinations help electoral participants understand their legal obligations and promotes fairness by providing information relevant to compliance to all electoral participants equally. This supports constructive compliance by providing electoral participants with resources to understand their obligations

3.6 Delivering systems, tools and processes to participate

The VEC has a strong focus on developing user-centric, innovative and effective systems and tools so that when people do participate, it counts.

3.6.1 Systems

The VEC provides several online tools to make it easy for the public to participate in the electoral landscape. For example, the interactive voting centre locator and an online form to identify and check current enrolment details. When electoral boundaries are reviewed, the VEC provides a platform for members of the public to view electoral boundaries and make a submission (including proposing amendments to boundaries) for consideration.

The VEC also manages a public-facing online disclosure system, VEC Disclosures, that allows recipients of political donations in Victoria and their donors to disclose political donations. VEC Disclosures is designed to assist recipients and donors to meet their requirements under the Electoral Act and is accordingly also used by recipients to submit required annual returns. VEC Disclosures provides transparency over the funding of political entities in Victoria.

The VEC's systems are subject to rigorous testing and monitoring to ensure they are secure and free from interference. The VEC is subject to the highest levels of security including the Australian Signals Directorate's (ASD) [Essential Eight security controls](#) (external link).

3.6.2 Processes

Procedures are designed to provide easy, consistent participation. Simple design features make it easier for elections to operate smoothly and reliably and for all eligible ballot papers to be included in counts.

For example, the VEC design colour-coded ballot papers that make it easy for election staff to quickly sort thousands of ballot papers across various districts, reducing the time it takes to conduct a count. The VEC also standardises ballot paper formality principles, so decisions for admitting ballot papers to the count are consistent.

Written procedures provide clarity for election staff and greater consistency across an election event, which supports equal participation.

3.6.3 Feedback

Electoral participants can contribute to the improvement of the electoral system through the VEC's customer feedback and complaints portal. The VEC review feedback and complaints to identify areas for improvement. This data can impact real changes in VEC policies and procedures, and support recommendations made to Parliament for legislative change. The VEC analyses the data extensively and takes note of any changes to public priorities, interests and concerns.

3.6.4 Live results release

During election events, the VEC releases results through its website in a timely and accurate manner. The online results system is an important accountability and transparency mechanism, providing the public with a reliable source of truth and quick access to election results. Being able to access and engage with the results of elections is a critical part of electoral participation for all electoral participants. Seeing live, accurate results reinforces the value and importance of democratic participation.

4 Demonstrating electoral integrity

Aside from delivering key activities that aim to facilitate widespread active participation, the VEC also contributes to electoral integrity through its conduct. The way duties and functions are performed and the exercise of statutory powers affect the perception of the VEC's integrity.

4.1 Electoral integrity principles

The VEC's guiding electoral integrity principles are:

1. **Transparency** – being open to scrutiny and making it easy for others to observe our work.
2. **Accountability** – being responsible for the work we are expected to do and the outcomes we produce.
3. **Fairness** – treating others equitably, in an objective manner, without the influence of arbitrary considerations.
4. **Impartiality** – being politically neutral and non-discriminatory in our decisions and conduct.
5. **Honesty** – being truthful, including when we make mistakes.
6. **Independence** – our decisions and views are free from interference.
7. **Consistency** – our services and conduct are reliable and cohesive.

Electoral integrity principles underpin the VEC's management of electoral integrity. When applied to the components of the VEC – systems, processes, decisions, legislative framework, culture and people – they generate integrity standards.

The electoral integrity matrix below at Figure 2 illustrates how we aim to apply integrity principles to the components of the VEC to create standards of electoral integrity.

4.2 Electoral integrity standards

Integrity standards are used by the VEC to guide our electoral integrity and provide a vision for what success looks like.

The standards apply to everyone at the VEC, though staff may contribute to a particular standard more than others due to the nature of their role and responsibilities.

With the release of this framework, staff will be trained in understanding and applying the integrity principles and standards to support the delivery of their duties and functions and to exercise their powers with integrity.

The standards are also a useful reference point to measure our electoral integrity maturity, by assessing how well we are meeting each standard.

4.3 Figure 2: Electoral integrity matrix: principles and standards

	Transparency	Accountability	Fairness	Impartiality	Honesty	Independence	Consistency
Systems	Our systems enable stakeholder communication and scrutiny of our work	Our systems enable us and other stakeholders to meet their legislative obligations	Our systems do not discriminate and allow equal access to information and services	Our systems reduce or remove potential bias and do not privilege any electoral participants above others	Our systems are reviewed and monitored to ensure they are fit-for-purpose	Our systems are free from interference and address our specific duties	Our systems are compatible and enable us to deliver our work cohesively and without vulnerability to error
Processes	Our processes are documented and open to scrutiny	Our processes are designed to uphold legislative responsibilities and protect the public interest	Our processes uphold the rights of people and employ the principles of natural justice and due process	Our processes are equally accessible, replicable and consistently adopted	Our processes are reviewed for continuous improvement	Our processes are independent from other bodies and protect the independence and accuracy of elections	Our processes are robust and are designed and employed in consideration of the complete electoral ecosystem
Decisions	Our decisions are recorded, appropriately published, and open to scrutiny	Our decisions reflect the public interest, and we consult and include relevant stakeholders	Our decisions consider the interests of affected stakeholders	Our decisions are consistent, objective, and do not favour certain stakeholders above others	Our decisions are made in a transparent way and in accordance with our decision-making process	Our decisions are made independently and free from interference or influence	Our decisions are evidence-based and justifiable
Legislative Framework	Our legislative responsibilities and our performance against them are known to all stakeholders	We are accountable to all legislation equally and hold people accountable for compliance with legislation we regulate	Our stakeholders are equally given the opportunity and support to comply with electoral legislation	We do not favour stakeholders in regulating or administering legislation	We advocate for change to the legislation where we believe it can be improved and we collect data to inform legislative improvements	We monitor our own legislative compliance and ensure we are fulfilling our specific legislative duties	Legislation is applied consistently and thoroughly
Culture	Our culture is articulated and demonstrated through our actions	Our culture reflects our values, which helps us support democracy	Our culture is to consider and respect everyone. Everyone's experiences matter equally.	Our culture does not tolerate political bias and we have ongoing obligations to disclose conflicts of interest	Our culture is reported, reflected on, and measured. We encourage a culture of disclosure	Our culture is inclusive, designed by us, and represents the VEC's role in Victorian society	Our culture is ingrained organisation-wide and is strong enough to withstand challenging situations
People	Our people share information equally and openly	Our people act in accordance with their delegated or prescribed powers, duties and functions under all law	Our people are treated fairly and show fairness towards others in their work	Our people do not act in a manner that would favour political participants or political outcomes	Our people disclose conflict of interests, raise concerns, and do not conceal mistakes or errors	Our people act in accordance with the VEC as an independent body and protect elections from interference	Our people communicate and collaborate with each other and share common goals

5 Monitoring electoral integrity

The VEC monitors its electoral integrity performance by evaluating:

- if the core integrity objectives are being met
- how well the VEC is meeting the integrity standards.

5.1 Evaluation of electoral events and services

The VEC conducts evaluations and commissions independent evaluations on the delivery of its electoral services, including at the end of major elections. Evaluation includes measures to monitor perceptions of electoral integrity, gain insights into emerging trends in the electoral landscape and gauge changing stakeholder interests. The VEC has an ongoing research panel which provides a representative and random sample of the public based on age, gender and location.

Key statistics are an indicator of the state of electoral integrity in Victoria and include:

- enrolment rates
- voter turnout
- public confidence in the VEC's delivery of high-quality elections with integrity
- public perceptions of the VEC's transparency, independence, impartiality
- number of candidates in an election
- rates of access to electoral communications
- rates of use of diverse voting options
- number of complaints or investigations
- informality rates

The evaluations focus on assessing key statistics and reflecting how well the VEC has achieved its core integrity objectives during each relevant election. These metrics can be influenced by factors outside the VEC's control, such as how many people choose to nominate as a candidate in an election.

Importantly, evaluation activities track changes over time; identifying improvements and new priorities. The VEC combines feedback from stakeholders with election statistics to produce a comprehensive and informed understanding of performance and insight into other factors that may contribute to electoral outcomes.

The diagram below has examples of data points that inform our assessment of our performance against the core integrity objectives.



OPPORTUNITY



INTENTION



SUPPORTS

OPPORTUNITY		INTENTION		SUPPORTS	
Promoting enrolment	Reducing barriers to participation	Motivating participation and promoting respect for electoral law	Fostering public trust in the VEC's services and electoral systems	Developing knowledge or how, when and where to participate	Delivering systems, tools and processes that enable free and fair participation
Total enrolment	Research conducted to identify under-represented communities	Regularity and reach of communications about democracy	Downloads of VEC's performance reports	Engagement rates with information about how to participate	Quality of system security measures
Number of updates to enrolment	Level of engagement with underrepresented communities	Number of enforcement actions for non-compliance	Media attention to VEC's integrity measures	Number of downloads of user-friendly explanatory guides	Reported incidents of non-compliance with procedures
Decrease in inaccuracies in electoral roll	Participation rates of underrepresented communities	Delivery of evidence-based recommendations to Parliament	Reception to misinformation register	Percentage of communications in diverse formats	Results released on time
Correlation between communication activities and enrolment updates	Satisfaction with diverse participation options	Public engagement with VEC's integrity communications	Number of complaints about VEC conduct	Stakeholder feedback on communications	Satisfaction with systems, processes and tools
			Performance against the VEC's reputation management index	Number of community based outreach sessions conducted	Customer feedback implemented

A diagram showing the data metrics that help indicate whether the VEC is meeting each core integrity objective.

The evaluation program informs strategic priorities for the VEC, so that we can continue to strive to achieve the core integrity objectives in a dynamic and changing electoral landscape.

5.2 Internal integrity pulse checks

During the planning and delivery of major electoral programs, the VEC conducts integrity 'pulse checks' with head office staff to assess how well they understand integrity standards and discuss how they are demonstrating the standards in their work. This activity identifies the VEC's integrity strengths and areas for improvement. It also provides an opportunity for staff to raise integrity queries, highlight risks and influence integrity management priorities. The pulse checks also reveal the VEC's performance against integrity standards over time.

The VEC has a strong emphasis on integrity culture and continuous improvement. We develop tools and resources to assist staff to implement strong integrity practices and make this a part of staff training.

5.3 Legal challenges

Electoral law entitles candidates, voters and the VEC to dispute the validity of an election by petition to the Court of Disputed Returns for State elections or an application to the Victorian Civil and Administrative Tribunal (**VCAT**) for local government elections. Some decisions made by the VEC can also be reviewed by VCAT, such as those about enrolment objections, registering or deregistering a political party, and registering how-to-vote-cards for an election.

Oversight by courts and tribunals is an important safeguard of electoral integrity, providing an independent assessment of electoral outcomes.

The power to challenge the validity of an election – or, for local government elections, seek a review of the declaration of the result of the election – supports the participation of Victorians in their democracy.

Challenges to electoral outcomes can assist the VEC to understand public expectations of electoral administration and assess perceptions of electoral integrity across groups of electoral participants. It also allows judicial interpretation of electoral law, which ultimately assists the VEC in its application and management of electoral integrity.

The VEC recognises that its legislated ability to challenge the validity of an election is a key duty, to be performed where the VEC has reason to suspect a miscarriage of the electoral process, either through its own or another's actions, or through extenuating circumstances. Honesty, accountability and impartiality will guide the VEC where it makes an application or petition.

5.4 Reputation management

We evaluate our reputation management according to our reputation management strategy (referred to at 3.3.1 Public Engagement). This strategy includes many measures of voters' perception of the VEC's conduct, including impartiality, independence, fairness and professional engagement with stakeholders. Voter feedback provides strong insights into the VEC's reputation which informs our electoral integrity priorities and activities.

6 Electoral integrity beyond the VEC

Electoral integrity is a shared responsibility requiring input from all participants in democracy. For example, the VEC provides resources to enrol to vote and eligible Victorians engage with those resources so that they are enrolled. Without participation from Victorians, the integrity of electoral outcomes is weakened as the representation of eligible electors is limited.

Political parties, candidates, political donors, scrutineers, election academics, journalists and members of the public all influence the vision for all Victorians actively participating in their democracy.

6.1 Candidates and political parties

Candidates and political parties can impact electoral integrity through their conduct and communications. Positive impacts might include raising awareness of the election and encouraging electors to cast their vote. Negative impacts might include undermining public trust in electoral outcomes, or misleading or deceiving electors for political gain.

Examples of behaviours that may negatively impact electoral integrity or perceptions of electoral integrity include:

- spreading misinformation or disinformation
- using unethical tactics to canvass for votes
- misreporting political donations or misusing public money for electoral purposes
- electoral fraud
- bribery, intimidation or violence
- dissuading electors from participating in democracy
- obstructing or interfering with electoral operations
- misusing elector information.

The Electoral Act establishes offences to discourage political participants from engaging in such behaviour. The VEC, Local Government Inspectorate, Victoria Police and other government authorities may enforce compliance with electoral law including, where appropriate, pursuing prosecution.

Candidates and political parties are expected to demonstrate ethical behaviour throughout their democratic participation to support free and fair elections. They are also expected to educate themselves about electoral processes to assist elections to be administered effectively. The implied freedom of political communication exists as a key part of the system of representative and responsible government, but it must be balanced with (and not override) other participants' freedoms. The VEC provides resources to assist candidates and political parties to understand their obligations and it is expected that they engage with this material.

More information on how we enforce compliance with the Electoral Act is provided above under **3.3.3 Enforcing the Electoral Act.**

6.2 Media

The media plays an important role in bringing public attention to elections and other electoral matters.

Media can enhance electoral integrity by facilitating political debate and highlighting the policy positions of candidates to help electors cast an informed vote. Media can also play a role in exposing behaviour which may negatively impact the integrity of an election. In this way, media can widely support the transparency and accountability of the electoral system.

At the same time, media (including social media) can have a negative impact on electoral integrity through inaccurate or biased reporting.

The media is responsible for presenting fair, balanced and objective information about the election, including the conduct of candidates, political parties and the VEC.

The Australian Communications and Media Authority (**ACMA**) oversees the regulation of Australia's media and is responsible for encouraging media services to:

- be responsive to the need for fair and accurate coverage of public interest matters
- develop codes that respect community standards.

While there is no national code of conduct for media, media services are encouraged to develop their own code of conduct. The Media, Entertainment and Arts Alliance maintains the industry's most far-reaching Code of Ethics for journalists.⁴

6.3 Scrutineers

Scrutineers are important to the transparency and integrity of elections. They observe and actively scrutinise key VEC election operations as they occur. Scrutineers are appointed by candidates to represent their interests in the conduct of election procedures, including the counting of ballot papers.

Scrutineers have a positive impact on electoral integrity by helping to ensure counting is consistent, fair and accurate.

Scrutineers can also have negative impacts on electoral integrity, particularly when they do not fully comprehend of the processes they are appointed to observe. The VEC provides scrutineers with educational resources to help build their understanding of electoral processes.

6.4 Interference

The Electoral Act also addresses the prospect of external interference with an electoral function or process. It requires the VEC (through express and implied duties) to ensure the integrity of voting by securing ballot material, premises, systems and voting centres.

The Electoral Act also anticipates that a person, body corporate or registered political party may attempt to interfere with electoral duties and functions and makes such conduct a criminal offence. Examples of interference include:

⁴ Code of Ethics, accessible at <https://www.meaa.org/meaa-media/code-of-ethics/>

- bribery
- using violence or intimidation to influence the vote of a person at an election
- interfering with a person's political liberty
- tampering with ballot material
- forging electoral papers
- voting or not upholding the secrecy of the vote other than as permitted
- canvassing for votes (in person or using materials) in a way prohibited by the Electoral Act
- impersonating a voter or election official.

The Electoral Act does not limit the scope of interference to elections; it recognises that the VEC requires, and is reliant on, the provision of truthful and accurate information and criminalises the provision of false information or carrying out of schemes to circumvent funding or disclosure obligations.

6.4.1 Foreign interference

Victorian elections are at risk of being targeted by foreign interference attempts, which is why the VEC partners with the National Counter Foreign Interference Coordination Centre (**NCFICC**) and the Department of Premier and Cabinet's Community Security and Emergency Management Branch. These bodies are responsible for assessing foreign interference risks and inform the VEC's treatment of electoral foreign interference risks in line with contemporary guidelines.

Foreign interference risk to VEC functions is assessed through 4 relevant pillars which involves assessing:

- the risk to the integrity of the Victorian Government
- the risk to the critical functions of Victorian Government services
- the risk to Victoria's social harmony
- risks that may arise through foreign investment.

For each of these 4 pillars, the VEC considers:

- the VEC's status and maturity level
- links to VEC strategic and operational risks;
- the overarching risk rating and target rating where relevant;
- any reasonable additional action the VEC could take to improve its risk posture.

As part of the VEC's ongoing treatment of this risk, relevant (high value target) staff are included in the VEC's annual conflict of interest declaration process. The VEC is continuing to further mature its risk mitigation and treatment of this risk.

6.5 Strategic partnerships

The VEC maintains strategic partnerships with other organisations and public bodies to enable the delivery of our services to be efficient and effective and meet contemporary needs.

We have strong relationships with other electoral commissions in our region to share information and resources, supporting each other to achieve strong standards of electoral administration.

The VEC also contributes to and monitors research about electoral matters through the Electoral Research and Regulation Network, which includes academics, non-profit democratic institutions and other electoral practitioners.

From a logistical standpoint, the VEC's strong partnerships with other organisations such as printing companies, distribution companies and postal services enable the printing and distribution of millions of ballot papers and other election resources across the State in a matter of hours.

The VEC has developed partnerships with other Victorian regulatory agencies such as Victoria Police and the Independent Broad-based Anti-Corruption Commission (**IBAC**) to detect, prevent and respond to interference with Victoria's electoral system. The VEC also partners with Commonwealth agencies and bodies through the Electoral Integrity and Assurance Taskforce (**EIAT**) on matters that may compromise real or perceived integrity of Victorian elections. The VEC also partners with online platforms to counter harmful electoral mis- and disinformation.

7 Conclusion

The VEC is committed to delivering trusted and legitimate electoral outcomes to support a healthy, strong democracy in Victoria.

The Electoral Integrity Framework aims to reinforce trust in the VEC by supporting Victorians to understand the range of measures the VEC has adopted across its electoral duties and functions to strengthen electoral integrity.

It explains the VEC's approach to defining, managing and monitoring electoral integrity through the lens of the VEC's vision for 'All Victorians actively participating in their democracy'. This framework is centred around the belief that widespread active participation in democracy is both a driver and indicator of trusted and legitimate electoral outcomes.

The VEC takes pride in the role it plays in upholding electoral integrity, in particular in facilitating active participation in Victoria's electoral system and demonstrating integrity in its conduct.

To highlight shared responsibility for electoral integrity, the Electoral Integrity Framework also outlines how other democratic participants contribute to electoral integrity and ultimately impact active participation in Victoria's democracy.

At the VEC, every vote counts. Electoral integrity is about ensuring this is true not just during a count, but at every stage of interaction that leads to a vote being cast and counted. Behind every vote, there is an ecosystem of democratic participants who all contribute to Victorians having the opportunity, intention and supports to participate in the electoral system.

8 Glossary

Term	Definition
Disinformation	Inaccurate information that is intended to mislead or deceive.
Election event	One or more elections or a referendum occurring on a particular date, typically for multiple wards (local government), or a State election or by-election.
Electoral boundary review	Periodic reviews of the boundaries of electoral districts, regions or councils to ensure population numbers are even between districts, regions or council wards.
General postal voter	A general postal voter is a person who is automatically mailed a ballot pack for all elections in their area for reasons such as illness, age, remote location or being a registered overseas elector.
Misinformation	False or inaccurate information that is spread regardless of intent to mislead or deceive.
Electoral integrity standard	An expected behaviour, conduct or practice to promote strong integrity in the electoral system.
VEC	The Victorian Electoral Commission, an independent statutory body responsible for the conduct of State parliamentary and local government elections and the conduct of other elections as required.
