4. The disclosure website

1 **Planning**
Guidance on planning an online reporting and disclosure system

2 **Designing**
Guidance on designing, developing and launching the reporting side of the system

3 **Using data**
Guidance on internal agency use of data received in the reports

4 **Disclosure**
The principles of a disclosure website
Guidance on designing a disclosure website

5 **Maintaining**
Maintaining and improving the system

4.1. Introduction

The disclosure website is the public-facing component of the system where the political finance data received are published. This transparency enables civil society to scrutinize the data and highlight issues in the public interest. It also allows other stakeholders such as political parties, candidates and donors to check that transactions have been reported accurately, and to monitor spending patterns.

A political finance disclosure website is an important element of a country's wider integrity system, which seeks to both protect politics from corruption and enhance public perceptions of its integrity. Tracking the money given to and spent by political parties, candidates and third parties is an important part of preventing and combating corrupt practices in public life. The transparency provided by a political finance disclosure website supports broader efforts to detect conflict of interests, limit the influence of lobbyists or expose undue influence on politicians during procurement of public contracts.

4.2. Principles of public disclosure of political finance data

International IDEA has identified seven guiding principles that should underpin a good political finance disclosure website: user-friendliness, accessibility, searchability, comparability, downloadability, timeliness and detail.

User friendliness

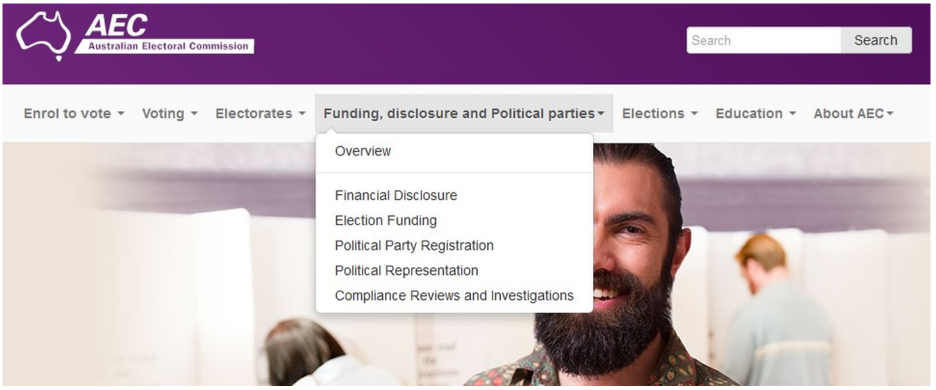
When agencies publish political finance data on their websites, they are providing a public service. Thus, in the interests of transparency, data should be presented in a way that is user-friendly and designed with the user in mind. The other six principles feed into this overarching principle of user-friendliness.

In order to be user-friendly, the designers of a disclosure site need to know who their users are and how they will use the data provided. In the USA, for example, various civil society organizations and academics use official FEC data to create their own databases and repackage the data. With this in mind, a new version of the FEC website developed in 2015 included sharing the FEC's application programming interface (API) so that users can directly receive the large amounts of FEC data (see below for more information on APIs).

Accessibility

The user should be able to easily and logically navigate their way to the disclosure data from the agency's home page, as in Figure 4.1. There is little point in making the data public if people struggle to locate it.

Figure 4.1. Australian Electoral Commission homepage



Source: Australian Electoral Commission, <http://www.aec.gov.au/>. © Commonwealth of Australia.

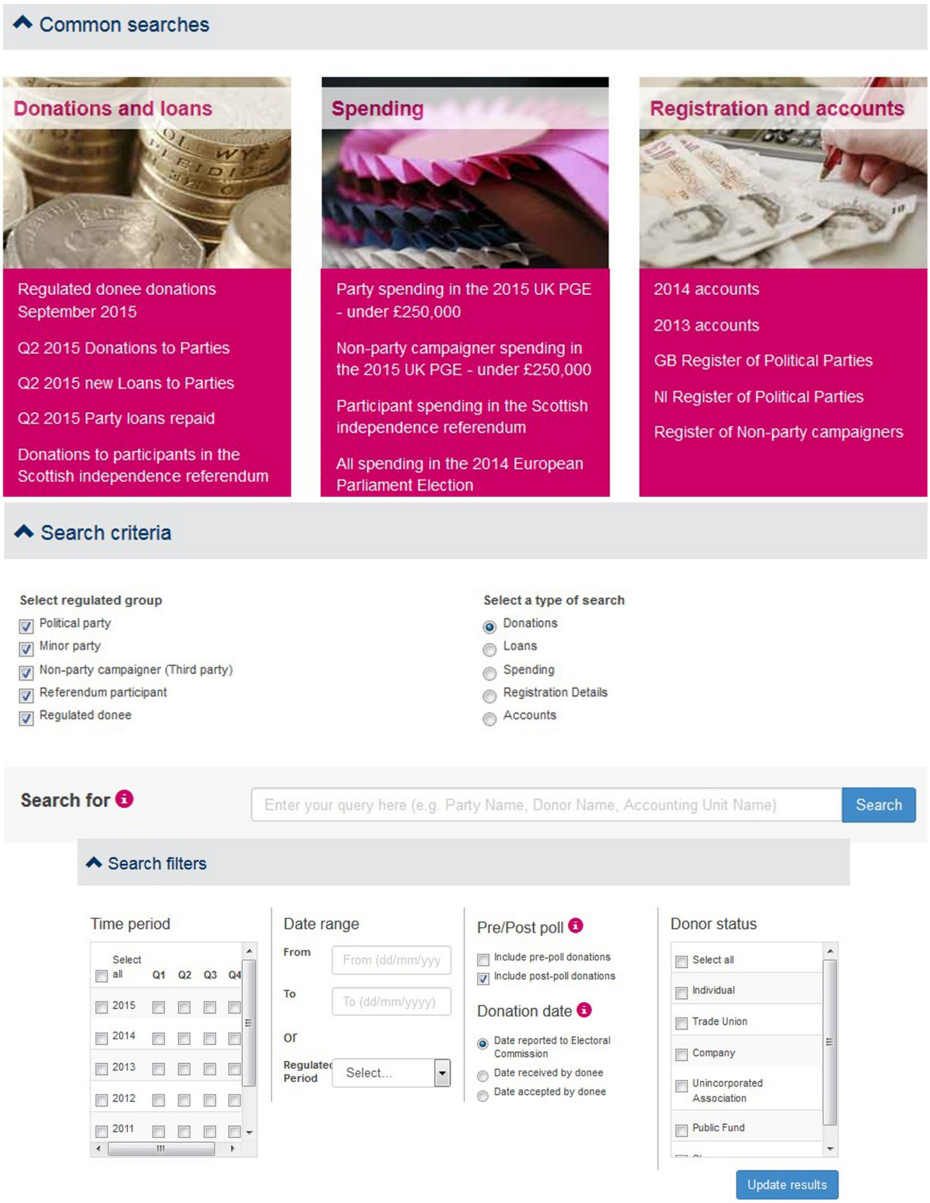
A mobile or tablet version, which automatically fits the content to the size of the screen without losing functionality, is also a good way to make the disclosure website more accessible. Users with disabilities should also be considered in the design process and accommodated where possible, even if it is not a legal stipulation. Using contrasting colours or a larger font for visually impaired users is one example. Providing the site in more than one language will greatly improve accessibility in some country contexts, and may be a legal requirement. In the UK, the website is available in both English and Welsh; in Norway in Norwegian and English; and in Finland in Finnish, Swedish and English.

Keep text simple and avoid using jargon or legal terms as much as possible. Where it is necessary to use technical language, ensure that a full explanation is easily accessible directly from the site. In the USA the FEC facilitates access by providing a rich site summary (RSS) feed that you can sign up to in order to receive notifications of newly published or amended data. The user can select to be notified on all updates, or just those fields that are of interest to them (FEC n.d.).

Searchability

For the data to be useful to the public, the user needs to be able to search for particular information. Data should therefore be presented in the form of a searchable database with clear search criteria and filters to enable precise search results, and have a general search function. The user should be able to search by both donor and recipient. The UK's Electoral Commission disclosure site divides its search function into three parts (see Figure 4.2).

Figure 4.2. Common searches on the UK's Electoral Commission website



Source: UK Electoral Commission, <http://search.electoralcommission.org.uk>. Used with kind permission.

Comparability

It is good practice for the user to be able to easily compare data across a variety of categories. It is in the public interest to display comparative data so that the user can get an informed picture of how parties, candidates and donors compare to each other. Examples of comparisons could include: How do the amounts or sources of income of one political party compare with those of another. How do parties compare in terms of spending levels and what they spent funds on? Which candidates are taking the most money from third-party donors? How do male and female candidates compare on the amounts of funds raised privately? A simple way to achieve this is to allow users to order data by column, value, date or alphabetically. Combined with search filters, this can produce very precise search results. To further improve the impact of the results consider adding a graphic visualization.

Figure 4.3. Donations to Finnish parliamentary elections, 2015

Largest donors

Largest donors and contributions by election. Because of the large number of disclosures, it may take several minutes for the reports on municipal elections to be generated.

Type of disclosure: * Election funding disclosure

Election: * Parliamentary elections 2015

Vaalipiiri: » Select

Party: » Select

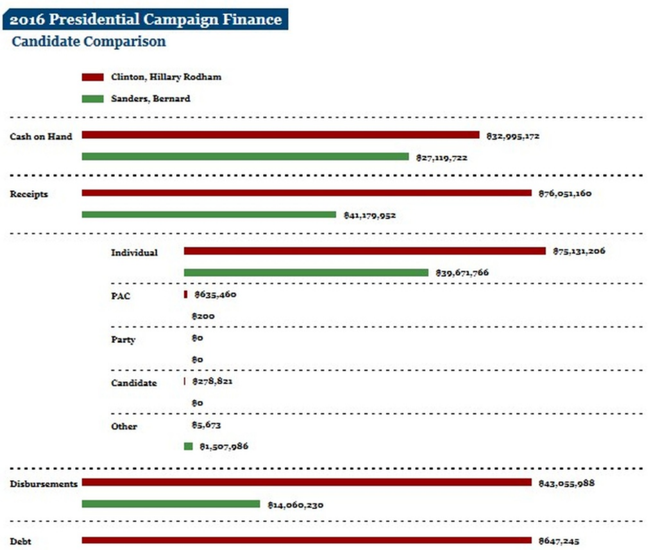
Search

Donator	Candidate who receive contribution	Contribution (€)
Kansallinen Kokoomus r.p., ruotsiksi Samlingspartiet r.p.	Stubb, Alexander	60 344,25
SDP	Rinne, Antti	54 000,00
Svenska Folkpartiet i Finland r.p., Ruotsalainen kansanpuolu...	Haglund, Carl	43 803,10
JYVÄSKYLÄN TYÖVÄENYHDISTYS RY	Mäkinen, Riitta	18 634,34
Kemin Vasemmistoliitto ry	Moisanen, Sari	17 139,95
JYVÄSKYLÄN TYÖVÄENYHDISTYS RY	Huovinen, Susanna	16 634,34
Salon Sosialidemokraattinen Työväenyhdistys ry	Taimela, Katja	15 000,00
Arkadian talouspoliittinen seura ry	Lintilä, Mika	14 670,65
Arkadian talouspoliittinen seura ry	Tiilikainen, Kimmo	13 934,00
Kokoomuksen Nuorten liitto ry	Rydman, Wille	13 420,00
Kokoomuksen Nuorten liitto ry	Häkkänen, Antti	13 419,91
Kokoomuksen Nuorten liitto ry	Koski, Susanna	13 419,91

Source: National Audit Office of Finland, <https://www.puoluerahoitus.fi/en/index/vaalirahailmoituksia/raportit/raportti_tukiantajittain.html.stx>.

Users should also be able to search for historical data, which enables comparisons over time. Complete records from previous elections or calendar years should be made available. Comparisons between years can also be facilitated, such as how much an individual donor has donated to a party over several reporting cycles, or how much it has spent on different election campaigns. Data should also be available in a cross-sectional way, for example to identify all parties or candidates who have received donations from a particular donor. In Finland, the largest donors can be compared to each other (see Figure 4.3). The US FEC allows data to be compared across a variety of categories and at different levels. Figure 4.4 shows a financial comparison of two presidential contenders.

Figure 4.4. Financial comparison of two presidential contenders



Source: US Federal Election Commission, <http://www.fec.gov/disclosurep/PCandCompare.do>.

It would also be useful to compare financial data on donors and the amounts spent by candidates broken down into categories such as gender, age and ethnicity. Such comparisons would likely reveal some stark patterns regarding who donates funds and the varying amounts of funds received by different types of candidate. Currently, no disclosure site offers financial data disaggregated along these lines.

Downloadability

The public should ideally be able to export and download all the data presented on the disclosure website in a machine-readable format such as a spreadsheet so they can work directly with it and manipulate it offline. This is particularly useful for journalists, civil society organizations and academics.

An advanced form of making the data downloadable is by making the APIs available. This enables a user's computer to directly access the database's channel of data, meaning that any new data are downloaded automatically and instantly. In this way the entire raw data set can be incorporated into external applications. This has been done in both the UK and the USA and is particularly useful for watchdog groups that have built their own disclosure databases drawing on the official data from the oversight agency, as it means that the data are automatically incorporated into their own databases.

The oversight body will always be restricted by its remit and available resources in terms of how much it can analyse and reinterpret the data. However, it should facilitate any demand for and innovative use of the raw data from civil society wherever possible. If you do produce an API, be sure to also publish a data dictionary as data fields may use identification markers that need to be interpreted correctly before they can be used.

Timeliness

The sooner data is made public, the sooner it can be scrutinized and used to hold parties and candidates to account. The timeliness of data is especially relevant during campaign time, when its publication can help voters make an informed choice before election day.

The timeline for data publication may be dictated by the law or regulations, such as provisions for quarterly or annual political party reports. All things being equal, however, the goal should be to disclose data as soon as possible. From a technological point of view, this can be almost instantly upon receipt. In the interest of transparency and accountability, it is better to publish data and amend details later if necessary than to delay publication until all checks and verifications have taken place. It is good practice to clearly distinguish between unverified (draft) data and verified (final) data.

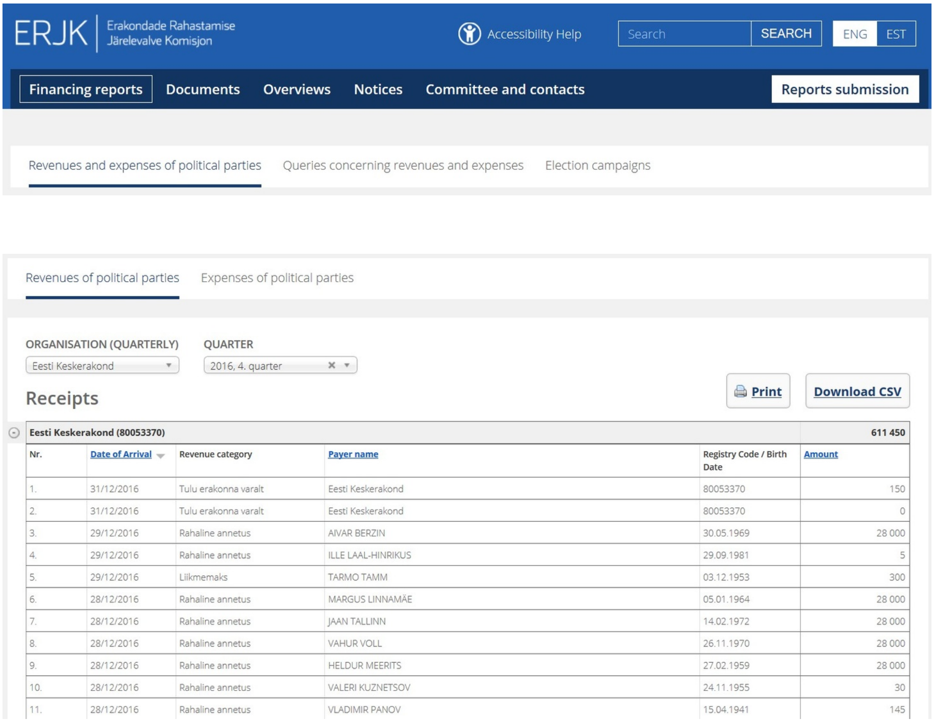
In the USA, electronically filed reports are published within a matter of hours following submission, and exactly as submitted. Even if errors are discovered, they are not corrected. It is the responsibility of the person filing the report to review the accuracy of data before submitting it. While amendments can be made, the original submitted version remains the official version available on the website.

Colombia is another good example of timely disclosure: candidates must submit details of all income and expenses on at least a weekly basis during the campaign period.

Detail

It is recommended that data are provided in both summary and itemized form, to be the most useful to users. In the interest of transparency, data should be published at the greatest level of detail possible. This should apply to both donations and spending, as well as any other areas subject to reporting, such as assets or loans. The public should accordingly be able to see names, amounts and dates. There is of course always a balance to strike between transparency and privacy, which will depend on the context, but the effort should always be to strive towards maximum transparency (see section 1.5).

Figure 4.5. Example from Estonia of itemized information on donations



Eesti Keskerakond (80053370)					611 450
Nr.	Date of Arrival	Revenue category	Payer name	Registry Code / Birth Date	Amount
1.	31/12/2016	Tulu erakonna varalt	Eesti Keskerakond	80053370	150
2.	31/12/2016	Tulu erakonna varalt	Eesti Keskerakond	80053370	0
3.	29/12/2016	Rahaline annetus	AIVAR BERZIN	30.05.1969	28 000
4.	29/12/2016	Rahaline annetus	ILLE LAAL-HINRIKUS	29.09.1981	5
5.	29/12/2016	Liikmemaks	TARMO TAMM	03.12.1953	300
6.	28/12/2016	Rahaline annetus	MARGUS LINNAMÄE	05.01.1964	28 000
7.	28/12/2016	Rahaline annetus	JAAN TALLINN	14.02.1972	28 000
8.	28/12/2016	Rahaline annetus	VAHUR VOLL	26.11.1970	28 000
9.	28/12/2016	Rahaline annetus	HELDUR MEERITS	27.02.1959	28 000
10.	28/12/2016	Rahaline annetus	VALERI KUZNETSOV	24.11.1955	30
11.	28/12/2016	Rahaline annetus	VLADIMIR PANOV	15.04.1941	145

Source: Political Parties Financing Surveillance Committee (Estonia), <http://www.erjk.ee>.

If there is original documentation to support the data, consider publishing this as PDF files alongside the data. For example, a candidate's electoral spending may be supported by a PDF of the original return. If original documentation is published, ensure that a process is in place to redact any private information that should not become public, such as personal contact details, bank details or signatures.

4.3. Designing a disclosure website: issues for consideration

End users

As with the reporting platform, knowledge of your end users and how they will use the disclosure site should inform its design. Creating user stories can be a useful way to articulate these needs (see section 1.3). Annex D offers some indicative examples of user stories for a disclosure website. A selection of end users should therefore be included in the design and testing processes. Taking their views and experiences into account will maximize its success. Seek representatives from all major user groups, including civil society groups, the media, academics, regulated organizations and other government departments. The user groups will have different needs that should be considered. For example, academics are likely to want entire data sets rather than specific searches.

Examples of issues to test with users include:

- *Use of terminology*. Avoid using legal terms that do not mean anything to members of the public.
- *Site navigation*. Getting to the site and then finding information within it.
- *Site functions*. Does the site enable users to answer the questions they have of the data? For example, do the filter options allow the search results to be restricted to a specific period using specific criteria?
- *Recalling user searches*. Allowing users to use the browser back button without needing to reapply all of the same search criteria each time.

Consider use of the site by social media users. Political institutions are increasingly being held to account by non-mainstream institutions and networks of individuals using social media. As well as the established user groups of the media and civil society groups, this newer group should be catered for in the system design. Examples include making it easy to share static URLs via social media, or using social media icons to facilitate the sharing of pages.

User feedback

If the oversight agency already has a disclosure website that will be redesigned in conjunction with the development of the online reporting system, it is good practice to solicit feedback from users of the old site to find out how they would like to see it improved. Users should also be able to give feedback on the website, both for site-related issues and to report suspicions of inaccurate or falsely reported financial information by reporting entities.

Allowing amendments after submission

In Australia, Estonia, Finland and the USA, parties and candidates can amend their reports at any time. However, all previous versions are kept on the website and the agency is notified when changes are made. While this allows for more flexibility and the correction of genuine errors, there is also a risk that those submitting reports may not be as conscientious in their reporting compared to a system that prohibits changes after submission.

Where loans and their repayments or other alterations are reported, it is useful to allow users to see the complete history of a loan. In the UK, this is provided in a history table along with the detail of the loan (see Figure 4.6).

Figure 4.6. Loan history shown at the bottom of a loan detail page on the UK's disclosure site

Loan history

Item ID	Value	Change effective date	Change type	Amount paid	Amount converted to donation
244874	£2,778.19	01/03/2016	Part repayment	£1,000.00	£0.00
250375	£2,778.19	18/07/2016	Full repayment	£0.00	£0.00

Source: UK Electoral Commission, <http://search.electoralcommission.org.uk/English/Loans/AL0240395>. Used with kind permission.

Compatibility

It is important to ensure compatibility with all major browsers and mobile phones. Browser compatibility issues should not be underestimated and they can be very frustrating for users and time-consuming for the oversight agency in providing assistance. It is wise to take this into account when purchasing third-party tools for the website, and to check that they provide compatibility now as well as seek assurance that they will continue to do so for any future updates.

Providing analysis

When publishing any analysis of data, the oversight agency must ensure that it remains impartial. Striking the right balance will vary from country to country. In the USA, for example, the FEC lists top spenders, but not top donors, whereas in Finland the national audit office presents a list of donors starting with the largest, as does the UK Electoral Commission. Statistics Norway, as the body that discloses summary data but does not oversee compliance with regulations, takes a slightly different approach and interprets the data in a more qualitative and narrative way on its website. The page on political parties' financing for 2014, for example, describes on a statistical, aggregated level how state subsidies remain the most important source of income for parties, how parties have been generating more of their own income, and how there has been an overall drop in the total amount of donations every non-election year (Statistics Norway 2014). The US FEC is circumspect in publishing analysis of its data. Some summary data are published, but only when there is no risk to the agency's integrity. Examples of analyses that are published include, 'the top ten political action committees' or 'top ten candidates in terms of the amount of received donations'.

Generally speaking, oversight agencies should steer clear of providing any in-depth analysis, trends or visualization of data as this may well compromise their position of providing the data in a neutral way. In contexts where civil society is less active, there may be more of an argument for the oversight agency to provide more analysis.

Facilitating analysis of data by civil society

Ideally, civil society should analyse political finance data. Oversight agencies should strive to facilitate the use of data by watchdog organizations, the media and academia. In addition to the disclosure website, this can be achieved by making the data downloadable, including making the APIs public, or allowing users to sign up to receive alerts when new data are published.

The oversight agency should also develop and implement a comprehensive communications and outreach plan to encourage members of the public and civil society to use the disclosure site. This is especially important when the site is first launched, around election time and when new data are published.

Public naming and shaming

In addition to publishing reported data, the oversight agency can also 'name and shame' those who fail in their reporting duties, in order to encourage greater compliance with reporting requirements. Agencies should, of course, be transparent and consistent in their treatment of non-compliance. For example, the disclosure website of the National Audit Agency of Finland publishes the names of political parties that fail to report on time. In Australia, public exposure of non-compliance is used to deter late filings, and the AEC publishes compliance reports on its disclosure website, naming parties and candidates who have failed to file a report (see Figure 4.7). In Norway, the names of political party units that have not fulfilled their legal reporting duties are published with corresponding remarks.

Figure 4.7. Example from Australia of naming candidates who have not filed a required report

AEC Australian Electoral Commission

Enrol to vote | Voting | Electorates | Funding, disclosure and Political parties | Elections | Educat

Home > Funding, Disclosure and Political Parties > Financial disclosure

List of candidates who have not yet lodged a return

Listen

Updated: 23 December 2016

Candidates who have not yet lodged a return by 23 December 2016

Candidate Name	Party	Electorate
ALI, Mohammad		SA
BAKER, Paul		Dobell
COLLYER, David James		VIC
DAWES, Robert Graham	Liberal Democratic Party	Solomon
GROSMAIRE, Daniel Christian		Eden-Monaro
HIGGINS, Lawrence Joseph	Australian Antipaedophile Party	Robertson
HOWARD, Graham	Family First Party	Ballarat
MARRIAGE, Belinda Ann		QLD
MOODY, Tammara Anne	Australian Antipaedophile Party	WA
NEWIE, Michael		Leichhardt

Source: Australian Electoral Commission, <http://www.aec.gov.au/Parties_and_Representatives/financial_disclosure/2016-election-non-returns.htm>. © Commonwealth of Australia.

4.4. Learning from civil society and political parties

Examples from civil society

Civil society organizations around the world also run their own databases revealing the finances of parties and candidates (see Table 4.1). These organizations normally use official data and repackage it in a more user-friendly way. Where official data are not available or are unreliable, some sites also incorporate unofficial data. In Colombia, for example, Transparencia Colombia, with support from the US National Democratic Institute, worked with political parties to develop standard electronic templates for reporting campaign finance.

The parties were part of the design process from the beginning and, in 2010 Cuentas Claras, an online campaign finance reporting tool, was launched. In 2011, Transparencia Colombia donated Cuentas Claras to the National Electoral Council, and political parties and candidates were required to use it to submit campaign finance reports (Transparencia Colombia conducts further analysis of the data published online). Its usage by parties and candidates in the 2014 parliamentary and presidential elections was near universal.

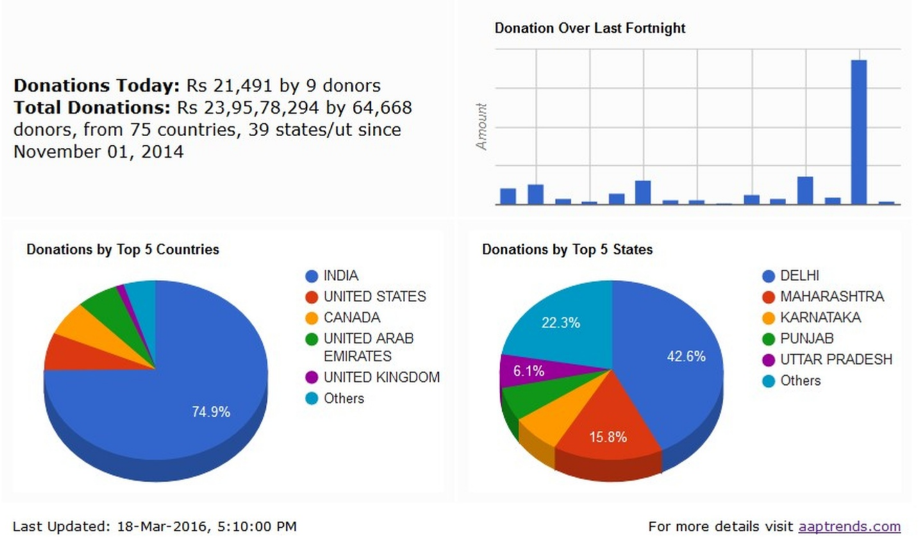
Table 4.1. Political finance disclosure databases produced by civil society

Country	Civil society organization	Name of database initiative	Website
Argentina	Poder Ciudadano	Dinero y Política	‹http://www.dineroypolitica.org›
Brazil	Transparencia Brasil	As Claras	‹http://www.asclaras.org.br/@index.php›
Canada	*LaPress* (newspaper)	Political Financing Map	‹http://www.lapresse.ca/actualites/elections-federales/political-financing-map/›
Georgia	Transparency International	Donations to Georgian Political Parties	‹http://www.transparency.ge/politicaldonations/en›
Guatemala	*Accion Ciudadana*	*Accion Ciudadana*	‹https://accionciudadana.org.gt/formularios/›
India	National Election Watch	My Neta	‹http://www.myneta.info/›
Italy	Patrimoni Trasparenti	Open Polis	‹http://patrimoni.openpolis.it/#/›
Philippines	Philippines Center for Investigative Journalism	MoneyPolitics	‹http://moneypolitics.pcij.org/campaign-finance/›
Poland	Stanczyk Foundation	Przejrzysty Krakow	‹https://przejrzystykrakow.pl/›
Slovakia	Fair Play Alliance	DataNest Fair Play Alliance	‹http://datanest.fair-play.sk/en/datasets#money-in-politics›
Sweden	Transparency International	Öppna bidrag	‹http://oppnabidrag.se/jamfor-partiernas-intakter/›
Ukraine	Chesno	Gold Parties	‹http://zp.chesno.org/›
Uruguay	Sudestada	Quien Paga?	‹http://www.sudestada.com.uy/10913/-Quien-paga#/›
USA	US Center for Responsive Politics	Opensecrets	‹http://www.opensecrets.org›
USA	Sunlight Foundation	Influence Explorer	‹http://influenceexplorer.com/›

Examples from political parties

The examples listed above could also serve as a source of inspiration for other civil society groups or political parties that wish to build their own databases. In the interest of transparency, some political parties voluntarily disclose their finances through databases published on their websites. These are normally political parties that take a strong anti-corruption stance. Two examples are India's Aam Aadmi Party (AAP) and Podemos in Spain. The AAP maintains a database on its website with both a summary of recent donations and a list of all individual donations, no matter the size. Donations are published as soon as they are registered (Figure 4.8). Podemos runs an advanced disclosure website containing both summary and itemized data for income and expenses. This site is searchable, machine readable and user friendly, with data displayed in a variety of ways (see Figure 4.9).

Figure 4.8. Aam Aadmi Party disclosure database



Source: Aam Aadmi Party, <http://aamaadmiparty.org/donation-list>.

Figure 4.9. Itemized income for Podemos, 2016

Source: Podemos, <https://transparencia.podemos.info/cuentas-claras/partido/ingresos/2016>.

Summary of key considerations for the disclosure website

- A disclosure site must be user-friendly and easy to navigate.
- Solicit the input of end users for the design and testing of the disclosure website.
- If reports can be amended after publication, how will revised data be presented on the disclosure site?
- Any analysis of data provided on the disclosure site must not compromise the oversight agency's impartiality.
- Facilitate civil society efforts to conduct independent analyses of published data.
- Should those who fail to comply with their reporting duties be named and shamed on the disclosure site?