



Coimisiún um Chaighdeán in Oifigí Poiblí
Standards in Public Office Commission

Proposal to Create an Electoral Commission

Submission by the Standards in Public Office
Commission

March 2019

The Establishment of an Electoral Commission in Ireland: Submission by the Standards in Public Office Commission

I. Introduction

The Standards in Public Office Commission is an independent, non-partisan body tasked with administering legislation in the areas of ethics in public office, lobbying regulation, state financing, and campaign finance. The Commission's mandate includes oversight of the Electoral Act 1997, which deals primarily with political and campaign finance.

In recent years, the electoral landscape in Ireland has changed significantly. The rise of digital technology and the importance of the internet as a communications and campaign tool has revolutionised elections and referendums. Election management, including the potential for online registration and voting, is also evolving and Ireland is looking to other jurisdictions to identify best practices and possible opportunities for modernisation. The frequency of referendums appears to be increasing, with the associated work of informing members of the public, and managing third party registration and disclosures. Foreign political involvement has also increased, with donations, fundraising and expenditure taking place offshore for dissemination into Ireland, as well as within the State.

It has become increasingly clear to the Standards Commission that these and other factors are presenting challenges to the electoral legislation currently in place, and the institutions that administer it. It is the view of the Standards Commission that a dedicated electoral commission should be established to combine the various disparate election and referendum oversight functions. This should be done preferably in the context of a comprehensive review of the Electoral Acts, with a view to modernisation and clarification of the Act's provisions.

The Standards Commission welcomes the opportunity to provide input into the current consultation on the possible creation of an electoral commission in Ireland.

For the purposes of this submission, we will largely focus on the Standards Commission's role and experience in administering the Electoral Act.

Specifically, the submission will look at the following:

- The role and functions of the Standards Commission;
- The experience of the Standards Commission in administering the Electoral Act; and
- Assessing the proposals for a new electoral commission and
- Providing recommendations.

Given the fact that any new commission will be charged with administering the Electoral Act, the Standards Commission will also discuss the pressing need for legislative reform in this area.

In drafting this submission, the Standards Commission had regard to the following:

- Department of Housing, Planning, Community and Local Government, *Regulatory Impact Analysis* (December 2018);
- Standards in Public Office Commission, *Submission to public consultation on Regulation of Online Political Advertising Ireland* (October 2018);
- Report of Interdepartmental Group on Security of Ireland's Electoral Process and Disinformation (June 2018);
- Department of Housing, Planning, Community and Local Government, *Consultation Paper on the Establishment of an Electoral Commission in Ireland* (January 2015);
- *Report of the Joint Oireachtas Committee on Environment, Culture and the Gaeltacht on the consultation on the proposed Electoral Commission* (January 2016);
- Previous reports by the Commission, including annual and special reports, dealing with issues under the Electoral Act; and
- Relevant recommendations and best practices identified by multilateral organisations.

II. Standards in Public Office Commission: Current Role and Functions

The Standards Commission has existed, in its current form, since 2001. It is comprised of six members:

- the Chairperson, who must be a current or former judge of the Supreme Court, the Court of Appeal or the High Court;
- four ex-officio members, namely:
 - o the Comptroller and Auditor General,
 - o the Ombudsman,
 - o the Clerk of Dáil Éireann, and
 - o the Clerk of Seanad Éireann; and
- a former member of Dáil Éireann or Seanad Éireann, who must not be a member of the European Parliament.

The Chairperson is appointed by the President on the advice of the Government following resolutions passed by each House recommending the appointment. The former member of the Oireachtas is appointed by the Government following resolutions passed by each House approving the proposed appointment.

The current chair is Mr Justice Daniel O'Keefe.

The Standards Commission is supported in its work by a professional Secretariat, the staff of which are civil servants and are attached to the Office of the Ombudsman. Currently, there are 19 staff at various levels assigned to the Commission.

a) [*Functions and powers*](#)

The Standards Commission oversees the following legislation:

- The Ethics in Public Office Act 1995 and Standards in Public Office Act 2001 (together known as the Ethics Acts), which set out standards of conduct for public officials, elected and appointed;
- The Electoral Act 1997, which regulates political financing, including political donations and election expenses;
- The Oireachtas (Ministerial and Parliamentary Activities) (Amendment) Act 2014, which regulates expenditure of public funds to political parties and independents; and
- The Regulation of Lobbying Act 2015, which makes transparent lobbying of public officials.

To fulfil its statutory obligations, the Commission provides guidance and advice to stakeholders; oversees compliance, including receiving statutory returns from individuals and organisations subject to the Acts; maintains the Register of Lobbying, the Register of Third Parties and the Register of Corporate Donors; processes complaints and examines possible wrongdoing under the Acts (with different powers under each of the Acts); and undertakes outreach activities to ensure that those with obligations under the Acts (including members of the Oireachtas, election candidates and lobbyists) understand and are able to comply with the Act's requirements.

III. [*Experience of Standards Commission in Administering Electoral Act*](#)

The Electoral Act regulates election expenditure, the reimbursement of election expenses, and political donations. It also provides for the registration of third parties and corporate donors.

The Commission publishes guidance for candidates, election agents, political parties, third parties, donors and corporate donors. The Commission also has a mandate to provide advice to persons with obligations under the Acts.

Other aspects of electoral governance (including election management) are dealt with by other electoral legislation administered by other bodies, including local authorities and the Department of Housing, Planning and Local Government, and are outside the scope of the Commission's work.

Since its establishment in 2001, the Commission has administered the Electoral Act, which has been amended on several occasions. Prior to 2001, the Act was administered by the Commission's predecessor, the Public Offices Commission.

a) [Overview of the legislation](#)

Disclosures

Candidates, elected representatives and political parties all must disclose information to the Standards Commission. Specifically, the Act requires the disclosure of political donations received by political parties, members of both Houses of the Oireachtas and Members of the European Parliament on an annual basis.

Donations and election expenses must be disclosed by candidates at Dáil, Seanad, European Parliament and presidential elections.

The Act also makes provision for State financing of qualified political parties. Parties must disclose their expenditure of these allowances to the Commission on an annual basis.

Spending limits

The Act sets election spending limits. The same limit applies to all candidates in a Presidential election. Limits at a Dáil or European election vary according to the size of the constituency. Eligible expenses may be reimbursed to the candidate, up to a maximum allowable amount.

Political donations

There are limits on the value of donations which may be accepted by political parties, third parties, candidates and elected representatives, or given by corporations. The Act prohibits foreign donations given by people or organisations from outside Ireland, other than citizens. It also requires the opening and maintenance of special political donation accounts by those who receive political donations.

Registration of third parties and corporate donors

Any person or group (other than a political party or election candidate) that accepts a political donation worth over €100 must register with the Commission as a "third party". Third parties are subject to disclosure obligations and donation limits, just as election candidates or political parties. Corporate donors cannot donate above a set amount unless they register with the Standards Commission.

Enforcement powers

The Commission's powers of investigation and enforcement vary across the legislation it administers. Its powers under the Regulation of Lobbying Act are the most wide-ranging. That Act provides for a suite of offences. The Commission may investigate contraventions,

has powers of search and seizure, may levy fixed payment penalties, and may prosecute offences under the Act.

Under the Ethics Acts, the Standards Commission may investigate possible contraventions of the Acts, with powers to compel witnesses and documents, and to hold hearings for the purposes of gathering evidence. The Ethics Acts also specify that the Commission may use its investigatory powers under the Ethics Acts to investigate complaints that a specified person under the Ethics Acts has also contravened their obligations under the Electoral Act. On foot of an investigation, the Commission may make findings and issue reports, which are made public. There are no powers of prosecution or fine. Offences do exist for obstruction, for example. These, or evidence of any offence under other legislation, must be referred to the Director of Public Prosecutions.

Under the Electoral Act, the Standards Commission's powers are more restricted. The Commission has the power to direct the production of any document or thing necessary to oversee compliance with the Act, and it may use any evidence it has to come to a view regarding the compliance of the person, and whether an offence may have been committed. The Commission has no other powers of investigation and cannot make binding determinations regarding complaints with respect to the compliance of other persons, including third parties and corporate donors. If the Commission forms the view that an offence may have been committed, it may refer the matter to An Garda Síochána/Director of Public Prosecutions.

b) Budgetary and reporting arrangements

The Standards Commission produces an annual report on its activities in administering the Regulation of Lobbying Act. This report is tabled directly in both Houses by 30 June each year.

Separately, the Commission produces an annual report on its activities in administering the other legislation within remit, which must be provided to the Minister for Public Expenditure and Reform by 30 June each year, for tabling in the Houses of the Oireachtas. The report is tabled by the Minister. The Commission also works with the Department for budget and resource purposes, and must report to the Department on expenditure and performance.

The Commission produces guidelines for publication on various issues under the Act, including guidelines on the requirement of political parties to disclose statements of accounts to the Commission. These guidelines must be approved by the Minister before they are published by the Commission.

c) What works well

In its years administering the Electoral Act, the Standards Commission has observed a number of strengths in terms of both legislation and the regulatory structure. These are outlined in bullet form, as follows:

- At election periods, including Dáil, Seanad, European and Presidential elections, the Commission is responsible for overseeing the disclosure of election expenses and political donations to candidates, political parties and accounting units. Operations in respect of these disclosures run relatively smoothly due to a combination of clear legislative provisions, general acceptance from parties and candidates of the need for transparency in these areas, clear internal operating procedures and experienced Commission members and staff. The Commission publishes draft guidelines in advance of elections in order to consult with affected groups, which helps ensure the final versions are clear and comprehensive;
- There are clear expenditure limits at elections, which ensures a level playing field and greater inclusivity for candidates without significant party or private resources;
- The registration of corporate donors is reasonably straightforward, with clear legislative provisions, a set period for registration (one year in duration with the ability to re-register the following year), and easy access to cross-check information through public documents available from the Companies' Registration Office;
- An education and guidance mandate is provided to the Commission in the legislation, and outreach, including annual sessions to members of the Oireachtas, has resulted in good levels of understanding and improved accuracy in reporting;
- The mandate of the Commission to provide advice has also been useful, both as an informal means of guiding those subject to the Act's obligations, and also providing binding advice as appropriate.

d) Challenges and gaps

The Commission has observed challenges in the current regulatory framework, both in terms of structural issues and legislative gaps. For ease, these are outlined in bullet points below. A summary of recommendations previously made by the Commission in its annual reports in respect of the Electoral Act is included at the **Appendix**.

Structural issues

- In other jurisdictions, ethics and standards regulators are funded directly by their parliament through a dedicated vote. They may publish guidance and advice, and table reports directly in parliament without going through a minister. They are

independent in staffing, performance reporting and managing resources. The Commission is of the view that this is a best practice that should be considered.

- Lack of independence from government in terms of budget, staff appointments, and reporting to the Oireachtas;
- A burdensome framework for reporting, with no less than seven separate statutory reports required under the Electoral Act alone;
- Four out of the six members of the Commission are ex-officio and have numerous statutory responsibilities in addition to their membership of the Commission, which impacts considerably on the time that can be dedicated to the work of the Commission;
- Secretariat staff also have responsibility for other operations within the Commission's remit, which means there is limited capacity for taking on work beyond processing electoral returns, such as inquiries into non-compliance;

Legislative gaps

Definitions:

- Third parties: The definition of what constitutes a third party is based on the acceptance of a donation over a set threshold given for political purposes, rather than by expenditure in the political sphere. This leaves out a significant number of groups engaging in campaigns that are self-funded. It also leaves open the possibility of dispute or difference as to whether a donation received was for their "political" purposes or for charitable or other purposes;
- Political purposes: The definition is wide-ranging and includes not only engaging in activities meant to influence the outcome of an election or referendum, but also engaging in any campaign to influence public policy or functions. This can apply outside an election or referendum period, and effectively brings the policy function of many civil society organisations within the scope of the Act's third party registration provisions. The Commission has commented on this in the past, but in the absence of any further clarification from the Oireachtas, must assume this is the intent of the Oireachtas and administer the Act as it is written.

Expenditure at election:

- There are no expenditure limits at referendum/Seanad elections, unlike for all other elections overseen by the Commission.
- While the current legislation provides for a certain amount of transparency of election expenses and donations, there are inconsistent declaration and disclosure requirements for different entities (e.g. political parties, third parties) under the Act.

Moreover, only donations above a certain, relatively high, threshold are required to be disclosed.

- Expenditure related to an election is often significantly front-loaded (i.e. completed before the election period formally begins) and therefore may be undisclosed and not subject to expenditure limits. Capturing a longer time frame than simply the date of the election call up until polling day might help address this. For example, any expenditure for electoral activities up to three months prior to an election call would be useful¹.

Funding

- The fact that only parties with a certain percentage of the vote are entitled to Exchequer funding, coupled with donation limits, may inhibit the effective establishment of new political parties. The Commission has previously recommended that the Oireachtas consider setting aside a specific sum to support the operation and development of less prominent political organisations that, under the current legislative provisions, are unlikely to qualify for receipt of Exchequer funding. Such funding should be subject to suitable controls to ensure that the funding is fully accounted for and is used for its proper purpose.

Enforcement

- The Commission has little power in the way of investigation and enforcement, which weakens considerably its ability to enforce compliance with the Act. The Commission may inquire and direct the production of documents or statements, form an opinion as to any possible non-compliance, and refer possible contraventions to the Director of Public Prosecutions or the Gardaí. Despite a number of such referrals, prosecutions are rarely pursued. The Commission cannot speculate as to why that may be, but would be of the view that a regulatory body with its own powers of investigation and prosecution might be well positioned to progress enforcement actions in cases of non-compliance.

Technology

- The Act predates common usage of the internet as a common communication device. The legislation does not address online political advertising or campaigning, nor does it address the use of digital technologies for any election mechanics (reporting, polling etc.) This would appear to be both a missed opportunity and a regulatory lacuna.

¹ Consideration would have to be given to how this might be achieved where an election date is unknown or is called at short notice.

Incoherence

- The Act has been amended many times over the years, leading to some inconsistencies among provisions, outdated references to monetary fine amounts, and challenges in respect of identifying all relevant amendments. There is a pressing need for a comprehensive review and reconsolidation.
- Elections for local authorities are treated separately and apart from Dail, Seanad, European and Presidential elections. This has led to confusion on the part of candidates, the inability to provide comprehensive advice when the Commission is contacted, and the risk of inconsistent advice.

Multiple reporting levels

- Individual public representatives, candidates and accounting units, as well as their parent political party, have multiple reporting obligations under the Act. Particularly in the case of smaller accounting units, this may be a burden and places additional administrative pressures at the local level.

IV. [Current proposals for an electoral commission: Assessment of options](#)

In the Regulatory Impact Analysis consultation document, the Department of Housing, Planning, Community and Local Government (the Department) has put forward recommendations for the establishment of a new electoral commission.

Specifically, the Department's RIA has identified a number of recommended functions of an electoral commission, namely:

- Oversight of the running of elections and referendums and policy role
- Referendum Commission
- Constituency Commission and Local Electoral Area Boundary Committee
- Register of electors
- Register of political parties
- Monitoring and reporting on political spending and donations
- Research
- Voter education and engagement
- Performance indicators.

The Standards Commission agrees that an electoral commission, if established, should take on all of the responsibilities outlined above, including those currently within the Standards Commission's remit.

The RIA further proposes four options in respect of implementation of the proposals. This submission will assess each of these in turn.

Option 1: No change

The Standards Commission views this option as undesirable. Challenges outlined previously in this document would indicate that there is a pressing need for a review of the institutional structure, powers and legislation in the area of electoral regulation. Issues that have been identified would not be addressed.

Option 2: Establish the electoral commission on a non-statutory basis initially, and assign a limited number of non-statutory functions with a view to establishing a statutory commission within 18-24 months and assigning further statutory functions at that time

The Standards Commission views this option as undesirable. It is unclear how establishing the electoral commission with limited, non-statutory functions, would provide for improved oversight arrangements of the electoral system as suggested.

Moreover, creation of a new commission on a non-statutory basis could give rise to confusion among the electorate in terms of accountability and responsibility for various electoral functions. Additional costs to the Exchequer are identified to support new, non-statutory functions, including voter education and research. In the absence of a statutory function, it is unclear where this would be housed, how it would be managed, how it would be staffed, and to whom it would report. It would in fact serve to further divide responsibility for managing Ireland's electoral system, rather than serving to move toward consolidation.

Finally, it is unclear how the costing of this proposal has been undertaken. Currently, each statutory function proposed to be consolidated under the new commission is housed within offices that provide access to shared services (including accommodation, human resources, information and communications technology, finance etc.) To establish a fully separate entity will require the establishment of these services in the new function. While costs associated with current staffing levels have likely incorporated a percentage associated with supports, and are likely based on estimates of the apportionment of staff time to tasks associated with Electoral Act functions, there are economies of scale that are applied in a larger organisation from which a new organisation would not necessarily benefit. Costs of supporting the new function in a fully separate authority must be considered. It is unlikely that this proposal would be cost-neutral, as suggested.

Option 3: Establish the electoral commission on a statutory basis and assign a limited number of functions initially, with a view to assigning further functions over time

The Standards Commission views this option as the most desirable and logical. The Commission has had experience in taking an incremental approach to implementation of new functions, specifically with the phased commencement of the Regulation of Lobbying Act, and has found this approach to be sound. It allows for time to ensure a smooth

transition and allow for new structures and functions to “bed down” before adding responsibilities.

Option 3 would provide for:

- a clear statutory authority with initial responsibility for specific functions, to be expanded over time;
- reduced division of responsibility among various authorities, providing greater clarity to the public as to responsibility and accountability for the electoral system;
- time to ensure a smooth transition for the initial transfer of responsibilities before adding to the role;
- minimised risk to compromising the integrity and smooth operation of existing functions; and
- the opportunity to add resources to take on new functions in respect of research, education and voter engagement.

However, it is noted that the RIA makes no reference to the structure of the new proposed commission, where it would be housed, or how it would be staffed (other than notional levels for some posts). The Commission would once more express concerns as to the proposed costing of the proposal, as discussed above in the assessment of Option 2.

Finally, there might also be a requirement for transition arrangements and a period of continued existence of predecessor functions to finish ongoing work or to address breaches that took place under the previous system but come to light under the new regime.

Option 4: Establish the electoral commission on a statutory basis with all functions transferred from the outset

The Standards Commission views this option as undesirable. While there are some benefits to taking this approach, including immediate and clear consolidation of all relevant electoral functions, such an approach would not allow for a smooth transition or a timed implementation. The Commission agrees with the position set out in the Regulatory Impact Assessment that this approach may risk compromising the smooth operation of existing functions and would ultimately not achieve the intended result of streamlining and simplifying processes.

V. Recommendations

The Standards Commission recommends that the following actions be taken in respect of the proposed establishment of an electoral commission:

- Establish electoral commission on statutory basis, with functions and responsibilities to be added over time, as per Option 3 outlined in the Department's Regulatory Impact Analysis paper;
- Ensure any new commission is set up as a body entirely independent of government for budgetary, reporting, publications and staffing purposes;
- Structure the new commission to ensure that members are dedicated to the role on a full-time basis and not as an additional function to other statutory roles;
- Provide secretariat support to the new commission via a stand-alone organisation, ensuring that all statutory and operational functions, including salary and non-salary expenditures, are appropriately resourced.
- Ensure appropriate transition planning to transfer responsibilities from current suite of statutory bodies to the new commission;
- Conduct a comprehensive review of the Electoral Act with a view to:
 - o Updating and consolidating the Act and its amendments, ensuring consistency in definitions and provisions in all sections and updating all financial references to reflect the current currency;
 - o Addressing issues with definitions of political purposes and third parties;
 - o Introducing statutory expenditure limits at referendums and Seanad elections;
 - o Incorporating local authority elections within the current expense and donation disclosure and monitoring framework;
 - o Lowering the disclosure threshold for all donations;
 - o Extending the election period for expenses to prevent "front-loading";
 - o Ensuring consistency of reporting and disclosure obligations for all elections and entities (candidates, parties, third parties etc.);
 - o Streamlining and simplification of reporting obligations for accounting units and parent political parties;
 - o Considering whether the eligibility requirements for Exchequer funding, combined with donation limits, serve as an impediment to the formation of new political entities;
 - o Strengthening the Act's enforcement provisions to provide the Commission with powers to investigate and prosecute offences;

- Introducing provisions to address digital technology and advertising originating outside the State;
- Streamlining reporting requirements to reduce number of statutory reports;
- Repealing and replacing all previous legislation; and
- Ensuring that any new legislation is drafted in plain language.

Conclusion

In conclusion, the Standards Commission is pleased to have had the opportunity to make this submission to the Department as part of its consultative process. The Commission and its staff are available to discuss any of these issues further as needed.

APPENDIX: Recommendations previously made by Commission in respect of Electoral Act

Recommendations relating to Electoral Act		Appears in Annual Report (list year)	Appears in other report (name)
<i>Substantive recommendations</i>			
1	Standards Commission should have a statutory basis on which to review the legislation and report on its findings	2003, 2005, 2006, 2007, 2009, 2010, 2011, 2012, 2013, 2014, 2015, 2016, 2017	
2	Spending limits should apply to broader electoral period, i.e. extend election period to include period prior to the dissolution of the Dáil or moving of the writ at an election	2002, 2003, 2005, 2006, 2007, 2009, 2010, 2011, 2012, 2013, 2014, 2015, 2016, 2017	
3	Definition of what constitutes a “third party” should be amended and based on expenditure for political purposes rather than acceptance of donations	2003, 2004, 2005, 2006, 2007, 2009, 2010, 2011, 2012, 2013, 2014, 2015, 2016, 2017	Third Parties and the Referendum in the Treaty of Lisbon
4	Registration process for “third parties” and for “other persons” (who intend to incur election expenses) should be amalgamated.	2003, 2004, 2005, 2006, 2007, 2009, 2010, 2011, 2012, 2013, 2014, 2015, 2016, 2017	
5	Expenditure limits should apply to third parties and other persons at election	2003, 2005, 2006, 2007, 2008	
6	Expenditure by third parties and political parties on referendum campaigns should be disclosed.	2009, 2011, 2012, 2013, 2014, 2015, 2016, 2017	Third Parties and the Referendum in the Treaty of Lisbon
7	Sources of funding for third parties and political parties should be disclosed	2009, 2011, 2012, 2013, 2014, 2015, 2016, 2017	
8	Electoral commission should be established and review of Act take place	2017	
9	Provision should be made for regulation of digital means of influence in election or referendum campaign, including by foreign actors	2017	
10	Expenditure limits should apply at referendums as well as elections	2017	
11	Smaller political parties, particularly those not in receipt of Exchequer funding, should be exempt from requirement to submit audited accounts	2016, 2017	
12	Provide for offences and penalties for failure to comply with parts IV, V, VI of 1997 Act	2005, 2006, 2007, 2008	

13	Provide for disposal of surplus donations in situations where person no longer required to maintain a political donations account and there are unused funds remaining	2003, 2005, 2006, 2007, 2008	
14	Offence should be provided for failure to open political donations account	2004, 2007, 2008	
15	Provide for the furnishing of a single Donation Statement in situations where a person holds a dual mandate or where, in a particular year he/she as a sitting TD, Senator or MEP unsuccessfully contested a Dáil, Seanad or European election.	2005, 2006, 2007	
16	Provide for offence for failure to provide necessary information to election agent or national agent for purposes of facilitating agent's EES	2005, 2006, 2007	
17	Review whether it is necessary to furnish, as a matter of course, supporting documentation in relation to the maintenance of a political donations account	2003	
18	Consider setting aside specific sum to support the operation and development of less prominent political organisations, which, under the current legislative provisions, are unlikely to qualify for receipt of Exchequer funding. Such funding would be subject to suitable controls being put in place to ensure that the funding is fully accounted for and is used for its proper purposes.	2003	
19	Consider whether definition of political purposes should be modified to include only campaigns relating to elections or referendums, rather than campaigns that seek to influence decisions or functions of public bodies		Third Parties and the Referendum in the Treaty of Lisbon

Technical recommendations

20	Amend Act to reflect fact that members of local authorities and candidates at local elections have their own reporting requirements under the Local Elections (Disclosure of Donations and Expenditure) Act 1999, as amended	2003, 2005, 2006, 2007	
21	Consolidate provisions from other legislation relating to use of public funds for electoral purposes. This would involve a consequential repeal of the provisions dealing with the provision of services and facilities following a dissolution of Dáil Éireann by the Houses of the Oireachtas Commission [Section 4(4A) of the Houses of the Oireachtas Commission Act 2003 (as inserted by the Houses of the Oireachtas Commission Act 2006) (now Section 4(c) of the Houses of the Oireachtas Commission (Amendment) Act 2009)	2005, 2006, 2007, 2008, 2009, 2010, 2011, 2012, 2013, 2014, 2015, 2016, 2017	
22	Clarify Act to specify whether expenditure of Exchequer funding is allowable in respect of capital and/or current spending.	2014	2017 Exchequer funding report

23	Amend definition of "financial institution" to include credit unions	2005, 2006, 2007, 2008	
24	Definition of "minor expenses" at an election should be limited to €126.97 per candidate	2005, 2006, 2007, 2008	
25	Modify term "election agent" to "election spending agent" or "election spending accounting officer"	2007, 2008	
26	Candidates should be required to notify Commission directly of change to election agent	2007, 2008	
27	Provide for discretion by Commission in allowing expenses such as refreshments for volunteer workers and candidate petrol costs	2007, 2008	
28	Amend section 31(10) of 1997 Act to include phrase "seeks to influence the outcome of an election"	2007, 2008	
29	Shorten interval between the making and the submission of the Statutory Declaration	2003	
30	Provide a statutory deadline by which candidates, who wish to do so, must finally assign part of their spending limits to their political parties.	2003	
31	Allow for registration of third parties should be allowed for a particular campaign or on an on-going basis	2009, 2011, 2012, 2013, 2014, 2015, 2016, 2017	Third Parties and the Referendum in the Treaty of Lisbon
32	Clarify duration of third party registration	2003, 2005, 2006, 2007, 2008	