



Office for Democratic Institutions and Human Rights

IRELAND

EARLY PARLIAMENTARY ELECTIONS
8 February 2020

ODIHR NEEDS ASSESSMENT MISSION REPORT

22-24 January 2020



Warsaw
5 February 2020

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ODIHR Needs Assessment Mission Report

I. INTRODUCTION

In anticipation of an invitation to observe the 8 February 2020 early parliamentary elections, and in accordance with its mandate, the OSCE Office for Democratic Institutions and Human Rights (ODIHR) undertook a Needs Assessment Mission (NAM) to Ireland from 22 to 24 January.¹ The NAM included Ana Rusu, ODIHR Senior Election Adviser, and Tamara Sartania, ODIHR Election Adviser.

The purpose of the mission was to assess the pre-election environment and the preparations for the upcoming parliamentary elections. Based on this assessment, the NAM recommends whether to deploy an ODIHR election-related activity for the forthcoming elections, and if so, what type of activity best meets the identified needs. Meetings were held with officials from state institutions as well as with representatives of political parties, the media and civil society. A list of meetings is included as an annex to this report.

ODIHR would like to thank the Department of Foreign Affairs and Trade for their assistance and co-operation in organizing the visit. ODIHR would also like to thank all of its interlocutors for taking the time to meet with the mission and to share their views.

II. EXECUTIVE SUMMARY

On 8 February the people of Ireland will elect 160 members of the *Dáil Éireann* (Lower House of the parliament) from 39 multiple-member constituencies, comprising between 3 and 5 representatives, depending on the population size. The maximum term of the lower house is five years. Seats are allocated proportionally, through a single transferable vote (PR-STV) system, in which voters numerically rank candidates in order of preference on their ballot. Early parliamentary elections were called on 14 January.

The elections are regulated by the Constitution of 1937, the Electoral Act of 1992 and the Electoral Act of 1997. No major amendments were introduced to the legal framework since last parliamentary elections. Based on the recommendations of the 2017 Constituency Commission report, a redrawing of constituency boundaries took place leading to a decrease in the total number of constituencies from 40 to 39, an increase in the total number of deputies from 158 to 160, as well as the adjustment of the number of seats in a number of constituencies.

The system of election administration remains decentralized. Co-ordination role is vested with the Franchise Section of the Department of Housing, Planning and Local Government. The department also issues guidelines, training materials and legislative advice, though does not provide formal oversight. A total of 19 local returning officers (ROs) are primarily responsible for the conduct of elections in the 39 constituencies, supported by polling staff hired for about 6,500 polling stations. While all ODIHR NAM interlocutors expressed confidence in the election administration's ability to

¹ On 23 January 2020, ODIHR received an official invitation to observe the elections.

professionally manage the elections, the establishment of an independent and permanent electoral commission to oversee the conduct of elections remains a high priority for all of them.

Irish citizens over the age of 18 years and British citizens residing in Ireland are eligible to vote in parliamentary elections. There is no centralized voter register, and voter list for each constituency is compiled by local authorities. The total number of eligible voters for these elections is around 3.3 million. All ODIHR NAM interlocutors expressed full confidence in the voter registration process while, at the same time, noting that this is an area that could benefit from further improvements, including through the establishment of a permanent electoral commission that would oversee the process.

A candidate in the parliamentary elections must be an Irish citizenship of at least 21 years of age and can be self-nominated or nominated by an eligible voter. Candidate registration is managed by the RO of the respective constituency who decides on the validity of the candidate's nomination papers. Parties nominating candidates should comply with a 30 per cent national gender quota. ODIHR NAM interlocutors stressed the need for the parties to be more ambitious in increasing the number of women candidates beyond the established quota.

The official campaign began after the dissolution of the *Dáil* on 14 January and will last until 14:00 on the day prior to election day. The campaign is expected to focus on issues related to housing, access to healthcare system, childcare, environmental issues and fight against crime. Although no interlocutor of ODIHR NAM raised concerns about the ability to campaign freely, some stressed the need to regulate the notion of online political advertising and to establish an oversight mechanism.

Campaign finance is well regulated and includes limits for donations. Standards in Public Office Commission (SIPO) is the authority in charge of the campaign finance rules enforcement. Ahead of this election it published guidelines related to disclosure of political donations, prohibited donations, limits on electoral spending and reimbursement of expenses. Most ODIHR NAM interlocutors considered the campaign finance system comprehensive and transparent and assessed that SIPO provides sufficient guidelines on the application of the law.

The media landscape is diverse and includes a wide range of broadcast and print media. The 2009 Broadcast Act provides for fairness, objectivity and impartiality of broadcasters. Paid political advertising is prohibited in broadcast media, but they may air free-of-charge political party broadcasts. Print media are self-regulated with a possibility to make complaints to the Press Ombudsperson. While representatives of the political parties that the ODIHR NAM met with expressed overall confidence in the impartiality of the election coverage by the media, some interlocutors thought that the criteria for debates could be more consistent from one election to another.

All ODIHR NAM interlocutors expressed a high level of trust in the integrity of the electoral process, including voting and counting procedures on election day and the ability of the election administration to conduct professional and transparent elections. No new electoral issues that would benefit from an additional assessment by ODIHR have been identified. Some concerns were raised with regard to the absence of a centralised voter registration process, the underregulated field of social media and impact of that on the electoral campaign, and the need for a permanent electoral commission that would not only oversee the electoral preparations but would also offer guidance on the conduct of TV debates. These issues were, however, not identified by electoral stakeholders as significantly impacting the upcoming elections.

Based on the above, the ODIHR NAM does not recommend deploying an election-related activity for the 8 February early parliamentary elections. However, ODIHR would like to reiterate that a number of its previous recommendations are still valid and encourages authorities to also consider the issues raised by interlocutors in discussions with the ODIHR NAM. ODIHR stands ready to offer its assistance upon request in a post-election follow-up process.

III. FINDINGS

A. POLITICAL BACKGROUND

Ireland is a parliamentary republic. The legislative power is exercised by the *Oireachtas* (Parliament) – a bicameral body composed of a directly elected lower chamber, the *Dáil Éireann* (House of Representatives), and an indirectly elected upper chamber, the *Seanad Éireann* (Senate). The government is led by the *Taoiseach* (Prime Minister), nominated by the *Dáil* and appointed by the president. The president is the head of state with limited powers and is, at the same time, member of the *Oireachtas*.

The maximum term of the parliament is five years from the date of its first meeting. According to the Constitution, the president dissolves the lower chamber on the advice of the prime minister and elections are held within 30 days. On 14 January, at the request of the prime minister, the president dissolved the House of Representatives and parliamentary elections were called for 8 February.²

Following the last parliamentary elections in 2016, a minority government was formed by *Fine Gael* and nine independent members of parliament.³ The largest opposition party *Fianna Fáil* signed a confidence-and-supply agreement with *Fine Gael* agreeing to abstain from cabinet nominations and motions of no confidence, as well as to support budgets. The initial agreement – in place until 2018 – was extended throughout 2019 as a result of uncertainty posed by Brexit.

For the 2011 and 2016 parliamentary elections, ODIHR deployed Needs Assessment Missions, which did not recommend deploying any election-related activity. For the parliamentary elections in 2007, ODIHR deployed an Election Assessment Mission, which offered a number of recommendations on how the authorities could improve the electoral process.⁴

B. LEGAL FRAMEWORK AND ELECTORAL SYSTEM

The legal framework governing the conduct of elections includes the Constitution of 1937 (last amended in 2018), the Electoral Act of 1992 (last amended in 2019) and the Electoral Act of 1997 (last amended in 2018).⁵ While previous ODIHR recommendation to consolidate election legislation into one electoral act has not been implemented, ODIHR NAM interlocutors found the legal

² Following dissolution of the *Dáil*, elections to the upper chamber must be held within 90 days. Elections to the Senate will begin on 30 March.

³ As a result of the 2016 parliamentary and the 2019 by-elections, the composition of the outgoing the *Dáil* is as follows: *Fine Gael* (48 seats), *Fianna Fáil* (46 seats), *Sinn Féin* (22 seats), the Labour Party (7 seats), Anti-Austerity Alliance – People before Profit (6 seats), Independents 4 Change (3 seats), Social Democrats (2 seats), Green Party (3 seats), and 21 independent MPs.

⁴ [See previous ODIHR election-related reports on Ireland.](#)

⁵ The 1992 Electoral Act covers voter registration and the preparation and conduct of elections. The 1997 Electoral Act covers, among other issues, campaign finance, gender quota and the framework to review constituencies.

framework clear enough to be conducive for democratic elections. Ireland is a party to major international instruments related to democratic elections.⁶

Most amendments to the legal framework that were introduced since last parliamentary elections were technical in nature, except the adjustment of total number of constituencies (down from 40 to 39), increase in the total number of deputies (from 158 to 160), redrawing of constituency boundaries and consequent adjustment of the number of seats in a number of constituencies. These amendments were based on the recommendations issued in 2017 by the Constituency Commission following publication of preliminary data from population census that, by law, serves as a ground for the review of constituencies. While the range of deputies is set by law between 153 and 160, the Constitution provides for regular review of the number of members to ensure equality of representation in constituencies.⁷ All ODIHR NAM interlocutors expressed high degree of confidence in the recommendations of the commission and the open and consultative process it undertook.

A total of 160 members of the lower chamber will be elected from 39 multiple-member constituencies, each comprising between 3 and 5 seats, depending on population size.⁸ The maximum term of the lower house is five years. Seats are allocated proportionally, through a single transferable vote (PR-STV) system, in which voters numerically rank candidates in order of preference on their ballots. Voters can also select just one candidate, but by indicating preferences they have the opportunity to re-direct their votes to other candidate(s). All ODIHR NAM interlocutors noted that the current system facilitates a direct link between deputies and their constituencies while at the same time ensuring proportional representation of political parties in the parliament. Despite its complexity, the system enjoys general confidence.

C. ELECTION ADMINISTRATION

The system of election administration remains decentralized. Co-ordination role is vested with the Franchise Section of the Department of Housing, Planning and Local Government (Franchise Section). The department also issues guidelines, training materials and legislative advice, though does not provide formal oversight.

Election day is set by the order of the Minister for Housing, Planning, and Local Government. The Clerk of the *Dáil* issues a letter to the 19 returning officers (RO) instructing them to hold elections.⁹ ROs are primarily responsible for the conduct of elections in the 39 constituencies, including registration of candidates, printing of ballots as well as hiring and training of the polling and counting staff. Each polling station is staffed by a presiding officer and a poll clerk. For each election the ROs seek to rehire individuals with previous election experience and are also advised to consider recruiting students and those who are unemployed. Persons campaigning for any candidate and/or a party are not eligible to apply. While there is no standard training for presiding officers in place, each RO

⁶ Including the 1950 European Convention on Human Rights, 1966 International Covenant on Civil and Political Rights, 1965 International Convention on the Elimination of All Forms of Racial Discrimination, 1979 Convention on the Elimination of All Forms of Discrimination against Women (CEDAW), 2003 United Nations Convention against Corruption and 2006 Convention on the Rights of Persons with Disabilities (CRPD). Ireland is also a member of the Council of Europe's Venice Commission and of the Group of States against Corruption (GRECO).

⁷ The constitution sets the ratio of elected members at 1 per 20,000-30,000 people.

⁸ The Speaker of the lower house is automatically re-elected if he/she stands for re-election, thus reducing the number of contested seats to 159.

⁹ Returning officers are chosen from county registrars with the exception of Dublin and Cork, where sheriffs serve the function.

determines how best to conduct their training sessions; some use manuals and an online training course prepared by the Franchise Section.

The voting will be conducted in about 6,500 polling stations across the country. While the number of voters assigned to each polling station is not legally prescribed, ROs do allocations per ballot box based on the voter register.

Counting takes place at the constituency level, starting at 9:00 the day following the elections and may last a few days. Each respective RO announces the results per constituency following completion of the count. The results are not tabulated centrally, but media present during the counts regularly report intermediate results and compile nationwide figures in their election coverage.

The law allows candidates and their representatives to observe the count and ROs have the discretion to also permit access to media and other entities. Observation of voting can be granted upon request. However, despite a previous ODIHR recommendation, there are no explicit provisions for the presence of citizen or international observers, which is at odds with paragraph 8 of the 1990 OSCE Copenhagen Document.

Authorities have undertaken specific arrangements to promote inclusive participation of different categories of voters. Only a marginal number of polling stations remains inaccessible to wheelchair users.¹⁰ The list of those polling stations is published in advance and the voters are allowed to request reallocation to another polling station, if necessary. In co-operation with the civil society, the Franchise Section developed special Braille-inscribed frames for ballots for blind and visually impaired voters. The frames with accompanying phone numbers to call for the list of candidates will be available at all polling stations. In addition, the law allows for postal and mobile voting for a limited category of voters, who are not able to visit a polling station on election day.

An overwhelming majority of ODIHR NAM interlocutors underlined the importance of establishing a permanent and independent electoral commission. This new and dedicated body would oversee all election related activities currently housed in different bodies, including the Standards in Public Office Commission (SIPO), the Referendum Commission, the Franchise Section and local authorities. The establishing of such a commission was recommended by the 2013 Constitutional Convention.¹¹ Some parties made establishment of the independent electoral commission a part of their manifestos as well.

All ODIHR NAM interlocutors expressed full confidence in the ability of the election administration to manage the election process, including polling day procedures, complex counting and tabulation of results, professionally and impartially.

D. VOTER REGISTRATION

Irish citizens over the age of 18 years and British citizens permanently residing in the country are eligible to vote in parliamentary elections. Irish citizens residing abroad are ineligible to vote, with

¹⁰ According to the authorities, all but 1.6 per cent of the polling stations are accessible.

¹¹ In December 2018, the Minister for Housing, Planning and Local Government launched a public consultation process on a regulatory impact assessment on the commission. Some ODIHR NAM interlocutors made submission to the consultation. In December 2019, the Government of Ireland approved initial legislation on creation of an Electoral Commission for Ireland and referred the bill to the parliament for further approval.

the exception of civil servants and military personnel and their families.¹² There are no restrictions based on intellectual or psychosocial disability and prisoners are allowed to vote as well.

There is no centralized voter register. Voter list for each constituency is compiled by local authorities and is available to candidates running in that constituency free of charge. The total number of eligible voters for these elections is estimated at 3.3 million.

Voters are responsible for registering to vote. Campaigns to encourage and educate voters to register and verify their details are usually undertaken by parties, as well as the Franchise Section and local authorities using public service announcements on television, print media and social media. In addition, awareness raising events are held throughout the country. Registers are available in local government offices and online for review. Additions and changes can be made annually prior to 25 November with the local registration authority. The final lists are published on 1 February, come into force on 15 February and are valid for all elections and referenda held until the next update comes into force.

According to ODIHR NAM interlocutors, the scheduling of election on 8 February – a mid-point between when the final registers are published and when they come into force, may affect thousands of voters, who registered or amended their registration last year prior to the legal deadline. Being placed on draft lists, those voters would need to apply for inclusion on a supplementary register 15 days before elections. A number of local authorities held events to help people register. The Franchise Section strongly advised citizens to check their registration by contacting local authorities. Relevant ads and informational news items appeared on Irish Radio and Television (RTE) and in major print and online media.

There is no comprehensive mechanism to check the accuracy of voter register and remove duplications. Voters do not need to provide a proof of de-registration in one constituency before registering in another, which could result in multiple entries for the same voter. However, all of ODIHR NAM interlocutors expressed full confidence in the voter registration process and raised no concerns regarding multiple voting or other types of fraudulent behavior. At the same time, they noted that voter registration remains an area that could be improved and possibly managed by a permanent electoral commission. In December 2019, the Government of Ireland approved a series of policy proposals aimed at modernizing the voter registration process, including introduction of a rolling register and a single national electoral register database with unique identifiers. These policies are in line with previous ODIHR recommendations on a comprehensive approach to voter register. The subsequent bill is expected to be approved by the incoming parliament.

E. CANDIDATE REGISTRATION

A prospective candidate parliamentary elections must hold an Irish citizenship, be at least 21 years old and have legal capacity. Persons that serve prison sentences for more than six months, are of “unsound mind” and hold certain public positions are not eligible to stand.¹³ A candidate can be self-nominated or nominated by an eligible voter and must provide either a certificate of political affiliation, or statutory declarations by 30 voters in the constituency, or a deposit of EUR 500. A voter may sign in support of more than one candidate. A candidate may run in more than one constituency and is not obliged to live in the constituency he/she is running for.

¹² Graduates of certain universities voting in Senate elections are eligible to vote by post.

¹³ See all disqualification criteria [here](#).

Candidate registration is managed by the RO of the respective constituency who decides on the validity of the candidate's nomination papers within one hour after submission. Nominations in these elections closed at noon on 22 January and the candidates had 24 hours at their disposal to withdraw from the race. All ODIHR NAM interlocutors positively assessed the smooth candidate registration process.

Parties should comply with a 30 per cent gender quota or risk losing half of their state funding entitlement. The quota will rise to 40 per cent in 2023. According to the data published by the NGO "Women for Elections", 162 out of 531 candidates (30.5 per cent) contesting the election are women.¹⁴ Although many ODIHR NAM interlocutors praised the fact that for the first time there will be a woman candidate running in each constituency, they also stressed the need for the parties to be more ambitious in increasing the number of women candidates beyond the established quota. Parties that the ODIHR NAM met with informed about particular needs of some women candidates such as, for instance, childcare facilities and stressed their commitment to work on internal party policies that favour the participation of female politicians.

F. ELECTION CAMPAIGN AND CAMPAIGN FINANCE

The official campaign began after the dissolution of the *Dáil* on 14 January and will last until 14:00 on the day prior to election day. A candidate is entitled to send one election letter free of postage charge to every elector in the constituency. In addition, parties that the ODIHR NAM met with intend to conduct campaigns using various methods including door-to-door canvassing, political advertisement in newspapers and online media, billboards, participation in TV and radio debates.

Facebook informed ODIHR NAM about tools that the platform is putting in place during the electoral campaign for reducing the distribution of false news and countering inauthentic activity through the setting up of a factcheckers network. In addition, the platform is planning series of awareness raising webinars for candidates and political parties, in particular new ones, on platform's community standards and the use of political ads features. Many ODIHR NAM interlocutors were of the opinion that there was a need to regulate the notion of online political advertising and to establish an oversight mechanism.¹⁵

The campaign is expected to focus on issues related to housing, access to healthcare system, childcare, fight against crime and environmental issues. Although no ODIHR NAM interlocutor raised concerns about the ability to campaign freely, some anticipated potential instances of inflammatory rhetoric on social media targeting candidates.

As in previous elections, campaign finance is regulated by the 1997 Electoral Act amended in 2018. While there is no cap on the total amount accumulated through donations, their acceptance is governed by strict rules. An anonymous donation cannot exceed EUR 100, cash donations should not be higher than EUR 200. Donations from abroad are allowed providing they are made by an Irish citizen that has an office in Ireland from where at least one principal activity is directed. Parties and candidates spending limits range from EUR 30,150 to 45,200 and take into account the number of

¹⁴ *Fine Gael* has the lowest percentage of women candidate with 30.5 per cent, followed by *Fianna Fáil* with 31 per cent, Labour 32 per cent and *Sinn Féin* 33 per cent. Other parties such as People Before Profit provided 38 per cent, the Green Party 41 per cent, and the Social Democrats 57 per cent of women candidates.

¹⁵ In its annual report for 2017, SIPO recommended that the 1997 Electoral Act be reviewed to address the issue of online political advertising and stated that this should preferably be done in the context of the creation of an electoral commission. However, due to other priorities of the previous government, no developments took place in the area of electoral reform.

seats in the constituency. Candidates are entitled to the reimbursement of their electoral expenses based on either being elected or receiving a certain number of votes. A candidate who receives at least a quarter of the electoral quota in the constituency can claim back up to EUR 8,700 in election expenses.

SIPO is the authority in charge of the campaign finance rules enforcement. Ahead of these elections it published two sets of guidelines for candidates, election agents, national agents of political parties and other persons related to disclosure of political donations, prohibited donations, limits on electoral spending and reimbursement of expenses.

Each political party putting forward candidates has to appoint a national agent and notify SIPO before the end of the candidate nomination process. The national agent is the only person who can make payments on behalf of the party or candidates. Candidates not affiliated with parties should appoint an election agent responsible for campaign expenditures with the RO by the same deadline. A candidate can act as his/her own election agent. Parties, candidates and third parties are required to submit campaign expenditure reports within 56 days from the election. Most ODIHR NAM interlocutors considered the campaign finance system comprehensive and transparent and assessed that SIPO provides sufficient guidelines on the application of the law.

For the financing of the campaign, most political parties rely on loans, membership fees and, to a lesser extent, donations. Many ODIHR NAM interlocutors highlighted the emergence of online fundraising through new platforms such as GoFundMe as a potential issue of concern with regard to possible breaches of the regulation on anonymous donations. In this regard, SIPO issued guidelines that oblige contestants to verify the identity of the donors who provide funding online.

G. MEDIA

The 2009 Broadcast Act provides for fairness, objectivity and impartiality of broadcasters. To comply with the law, in 2013 the Broadcasting Authority of Ireland (BAI) developed a Code of Fairness, Objectivity and Impartiality in News and Current Affairs that apply to all broadcasters within the jurisdiction of Ireland, thus excluding other broadcasters licenced outside the country. In September 2018, the Code was supplemented with Rule 27 Guidelines for Coverage of General, Presidential, Senate, Local and European Elections concerning a range of issues including coverage of opinion polls, achieving diversity in coverage and the handling of complaints.

While political advertising is prohibited in broadcast media, party political broadcasts are permitted during election campaigns and may be aired by broadcasters. Only parties registered in the Register of Political Parties are entitled to such broadcasts and the decision in respect to their allocation lies with the broadcaster. *Irish Radio and Television (RTE)*, the public broadcaster, informed the ODIHR NAM about the decision to offer political broadcasts to political parties on the basis of representation in the outgoing parliament as well as to the new parties if they put forward at least seven candidates. A letter with the proposed allocated time is sent by *RTE* to all parties that fulfil the criteria.

In addition, *RTE* plans to conduct and broadcast live two debates as part of its televised election coverage: one featuring seven party leaders on 27 January and another one, on 4 February, with the leaders of *Fine Gael* and *Fianna Fáil* parties, who are seen as potential Prime Ministers. According to *RTE*, the criteria for participation in the second debate take into consideration a number of objective and impartial criteria, including the results of the last comparable elections, such as parliamentary

elections in 2016, 2019 local and European elections as well as other factors.¹⁶ While representatives of the political parties that the ODIHR NAM met with expressed overall confidence in the impartiality of the election coverage by the media, some interlocutors were of the opinion that the criteria for debates could be more consistent from one election to another. Furthermore, they stressed that the establishment of a permanent electoral commission whose task, among others, would be to offer guidance on the conduct of TV debates, could further consolidate public trust in elections.

Print media are largely self-regulated and are not bound by the rules of objectivity, fairness and impartiality. A Press Ombudsperson responds to potential complaints on print media. However, it was acknowledged that the timeframe of several weeks for hearing complaints is too long and not appropriate for an election period. Most complaints are filed outside an election period and concern issues related to the accuracy of the information, children's rights and data privacy issues.

H. COMPLAINTS AND APPEALS

An election petition may be submitted with the High Court, in exchange for a considerable monetary deposit, on issues pertaining to voter and candidate registration, campaigning and campaign financing, voting, counting and other electoral offences.¹⁷ A decision of the High Court can be further challenged to the Supreme Court as the final instance.

No specific deadlines apply to the hearing of election-related complaints. All ODIHR NAM interlocutors expressed high degree of trust in the judiciary system and the impartiality of judges in dealing with complaints and appeals.

IV. CONCLUSIONS AND RECOMMENDATION

All ODIHR NAM interlocutors expressed a high level of trust in the integrity of the electoral process, including voting and counting procedures on election day and the ability of the election administration to conduct professional and transparent elections. No new electoral issues that would benefit from an additional assessment by ODIHR have been identified. Some concerns were raised with regard to the absence of a centralised voter registration process, the underregulated field of social media and impact of that on the electoral campaign, and the need for a permanent electoral commission that would not only oversee the electoral preparations but would also offer guidance on the conduct of TV debates. These issues were, however, not identified by electoral stakeholders as significantly impacting the upcoming elections.

Based on the above, the ODIHR NAM does not recommend deploying an election-related activity for the 8 February early parliamentary elections. ODIHR would, however, like to reiterate that a number of its previous recommendations are still valid and encourages authorities to also consider the issues raised by interlocutors in discussions with the ODIHR NAM. ODIHR stands ready to offer its assistance upon request in a post-election follow-up process.

¹⁶ *Sinn Féin* leader criticised *RTE* decision on used criteria and issued a [complaint](#) over exclusion from the second leaders' debate.

¹⁷ The amount is approximately EUR 5,000 but the court may require a lesser amount if it considers that a petitioner is unable to lodge the amount specified or that the provision of such an amount would cause serious hardship to him/her.

ANNEX: LIST OF MEETINGS

Department of Foreign Affairs and Trade

Aingéal O'Donoghue, Director General, EU Division
Caitríona de Búrca, Deputy Director, EU Division
Emma Hickey, Deputy Director, Human Rights Unit
Eoin Bennis, Deputy Director, EU Division
Aoife Ní Fheargail, Deputy Director, Civil Society & Development Education
Claire Kerschensteiner, Desk Officer, Civil Society & Development Education
Steven Murphy, Desk Officer, EU Division

Department of Housing, Planning, and Local Government

Barry Ryan, Principal Officer
Paris Beausang, Assistant Principal Officer
Mairéad Ryan, Assistant Principal Officer
Ian Stuart-Mills, Administrative Officer

Standards in Public Office Commission

Brian McKevitt, Assistant Principal, Ethics and Electoral Regulation
Raymond Butler, Commission Secretariat

Office of Ombudsman

Peter Tyndall, Ombudsman and Information Commissioner

Office of Press Ombudsman

Peter Feeney, Press Ombudsman

Office of Returning Officer

Fergus Gallagher, Returning Officer for Dublin County
Deborah King, Office of Returning Officer for Dublin County

Public Broadcaster Irish Radio and Television

Brian Dowling, Head, Editorial Standards and Compliance

Political Parties

Tom Curran, General Secretary, *Fine Gael*
Sean Dorgan, General Secretary, *Fianna Fáil*
Maura McMahon, General Secretary, *Green Party*
Anna Conlan, Parliamentary Political Manager, *Green Party*
Nat O'Connor, Political Director, *Labour Party*
Brian Sheehan, General Secretary, *Social Democrats*

Civil Society and Social Media

John Devitt, Chief Executive Officer, Transparency International
Cairín de Buis, Chief Executive Officer, Women for Election
Dualta Ó Broin, Head of Public Policy for Ireland, Facebook
Meg Chang, Public Policy Manager, Elections, Facebook
Richard Lappin, Public Policy Manager, Content (Elections), Facebook