

Auditing the voter register: purpose, impact, and where we are at the moment

The purpose of the audit is to determine, on the basis of evidence, whether the Unified Voter Register can be trusted — and to correct the problems it finds. It does this by testing both the accuracy of the data and the resilience of the system that maintains it, proceeding in sequence from first indications, through deeper checks, to findings and conclusions.

The four aims

Accuracy

Do entries match the real, lawful situation?

Resilience

Is the system protected from error and abuse?

Efficiency

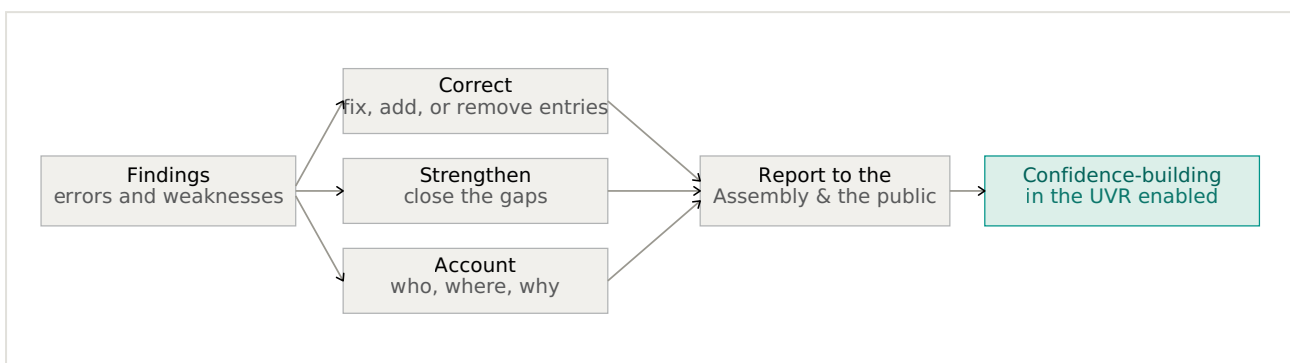
Are records kept and updated in time?

Accountability

Can a fault be traced to its cause?

How the audit creates impact

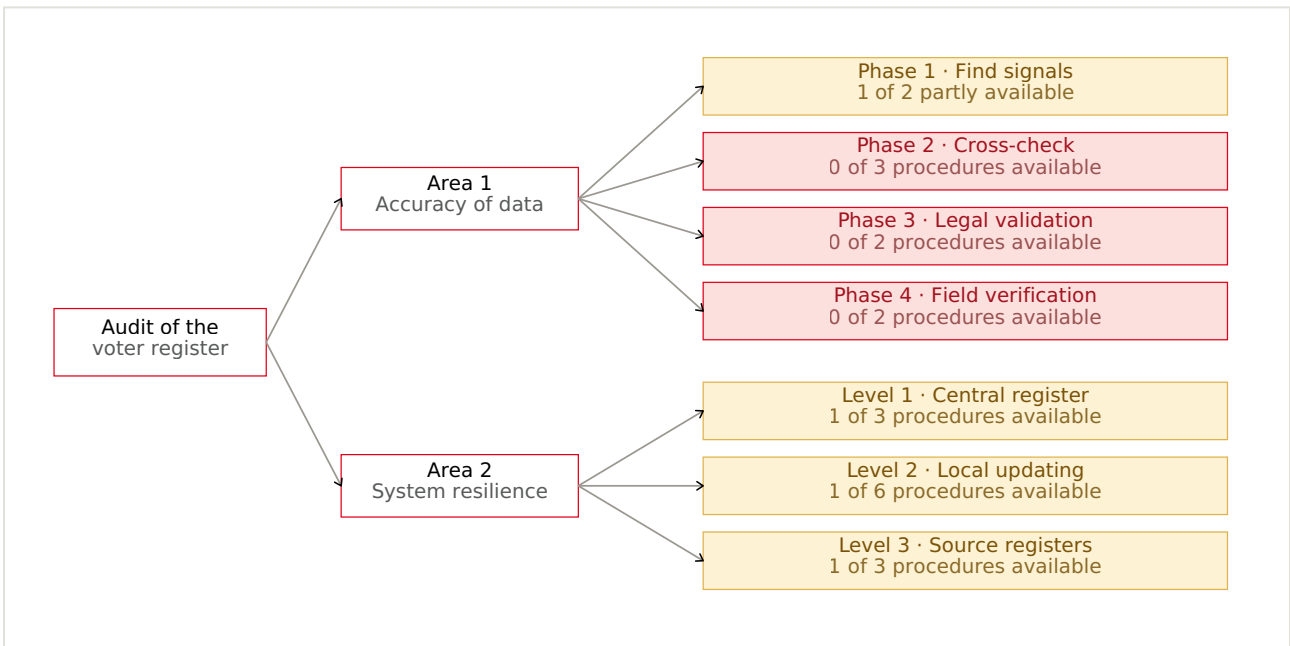
Findings are not the end point. Each one feeds a step that changes the register and the system around it — and contributes to confidence-building in the UVR.



The audit program at a glance

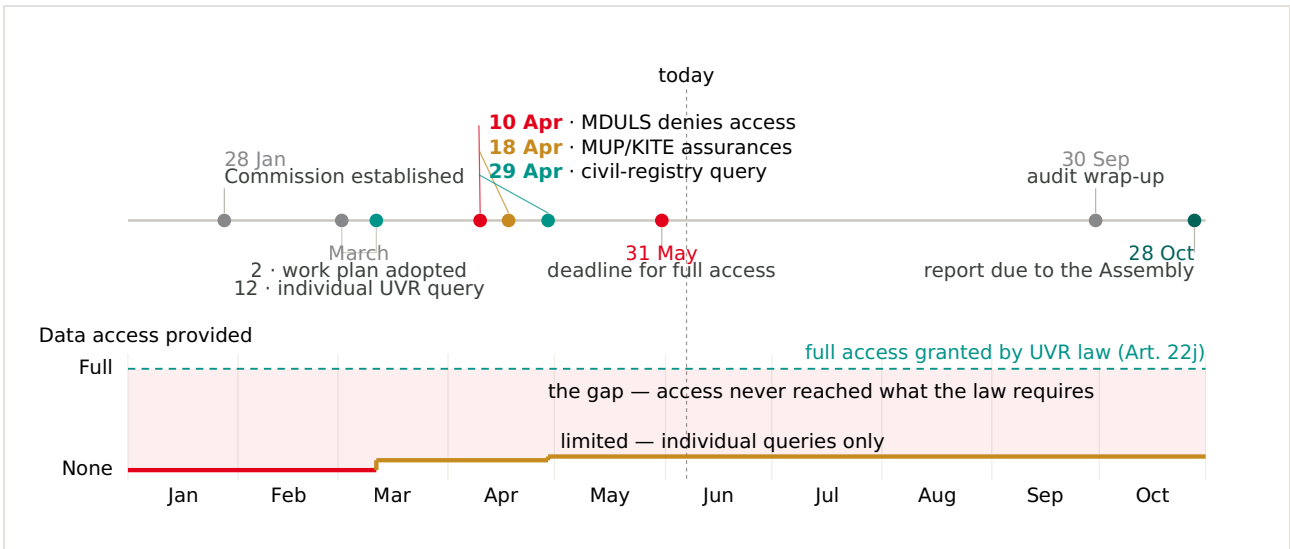
The structure of the methodology. Colours show whether the procedures in each phase/level can be performed with the current access granted; no part reaches full scope. Each box is clickable — select one to jump to that part of the [detailed program below](#).

- full scope — not reached by any part
- only the legal review or individual complaint checks
- none can run



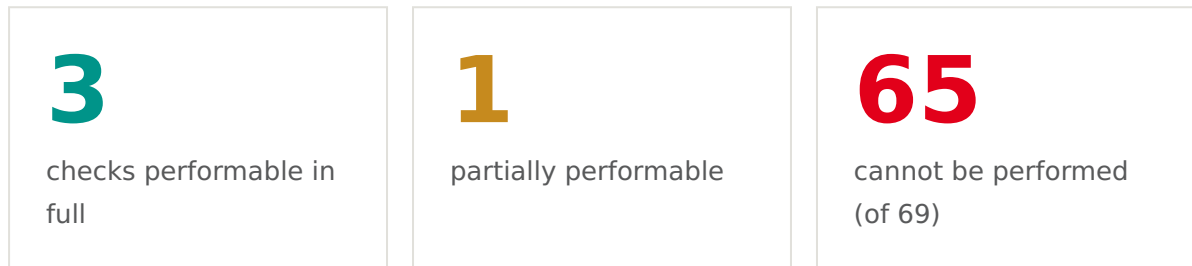
The access story over time

Across 2026 the Commission's access has never risen above very limited record-by-record queries. The full access the law provides has not been delivered, while the deadlines and the reporting obligation have continued to run. The graph shows the access actually provided against the full access the law mandates (dashed).



Select a point on the timeline for detail.

How much of the audit can be performed



Select a bar segment or a figure above to list the checks it covers.

Only the three legal reviews can be carried out in full, and the first review of citizen complaints only partially — because the register shows a voter's current data but no history of changes. That is 3+1 of the 69 checks the methodology defines. Every check that requires analysing the register as a whole, cross-referencing it against other registers, auditing changes in the registry, or examining the system's security — where the great majority of the work lies — cannot be performed.

The audit program and its coverage

The methodology defines 69 individual checks under 21 procedures. Each row shows the evidence a procedure requires and whether that evidence has been made available. Select any row to see the checks within it.

Area 1 — Is the data accurate? From the first signal of an inaccuracy to a confirmed or dismissed conclusion.

PHASE 1 · FIND THE SIGNALS

2.1.2 Whole-register quality scan	The register analysed as a whole (aggregate access)	○ Cannot be performed	8
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CHECKS WITHIN THIS PROCEDURE

- Aggregate profile of the register by category
- Outlier number of voters per address / household
- Outlier rate of changes per individual voter
- Identification of missing data
- Logical-consistency checks
- Arithmetic-consistency checks
- Field syntax and meaning checks
- Referential-integrity checks

2.4.3 Handling citizen complaints	Individual look-up of present data only — no history of changes per voter	● Partially	1
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CHECKS WITHIN THIS PROCEDURE

- Preliminary examination of a complaint's data

PHASE 2 · CROSS-CHECK THE REGISTERS

2.3.2 Quality scan of the source registers	Aggregate view and change history of source registers	○ Cannot be performed	7
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CHECKS WITHIN THIS PROCEDURE

- Aggregate profile of civil, residence and other registers
- Outlier permanent-residence changes
- Outlier temporary-residence changes
- Outlier passivisation changes
- Outlier citizenship changes
- Outlier border-police data
- Outlier civil-registry data

2.3.5 Match register against source records	Cross-referencing at scale; citizenship,	○ Cannot be performed	7
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IDP, legal-capacity,
sanctions records

CHECKS WITHIN THIS PROCEDURE

- Consistency with residence records
- Consistency with civil registries
- Consistency with the citizenship register
- Consistency with the IDP register
- Consistency with legal-capacity, sanctions and military-service records
- Consistency of changes, register vs source
- Statistical analysis of mismatches

2.3.6 Verify against census, address and other registries

Census (SORS), Address Register, other datasets

○ Cannot be performed

6

CHECKS WITHIN THIS PROCEDURE

- Consistency with census data (SORS)
- Consistency with other central-registry data
- Addresses vs the Address Register (RGA / Post)
- Consistency with household data from other records
- Consistency with other relevant registers
- Spatial clustering of mismatches

PHASE 3 · LEGAL VALIDATION

2.2.3 Legality of entry and deletion decisions

Decision records and supporting documents

○ Cannot be performed

1

CHECKS WITHIN THIS PROCEDURE

- Legal validity of the decisions underlying register changes

2.3.3 Legality of the residence basis

Previous addresses and basis documents

○ Cannot be performed

1

CHECKS WITHIN THIS PROCEDURE

- Legal basis for establishing residence, incl. naturalised citizens

PHASE 4 · FIELD VERIFICATION (THE FINAL STEP)

<p>2.4.1 Field check — register to citizens</p>	<p>A representative sample drawn from the full register; field access</p>	<p><input type="radio"/> Cannot be performed</p>	<p>1</p>
<p>CHECKS WITHIN THIS PROCEDURE</p> <ul style="list-style-type: none"> • Verify register entries against citizens' real circumstances 			
<p>2.4.2 Field check — citizens to register</p>	<p>A representative sample; field access</p>	<p><input type="radio"/> Cannot be performed</p>	<p>1</p>
<p>CHECKS WITHIN THIS PROCEDURE</p> <ul style="list-style-type: none"> • Verify citizens' real circumstances against the register 			
<p>Area 2 — Is the system resilient? Whether the legal, organisational and IT framework prevents, detects and corrects error and abuse.</p>			
<p>LEVEL 1 · THE CENTRAL REGISTER</p>			
<p>2.1.1 Legal review — central-register framework</p>	<p>Publicly available legal norms</p>	<p><input checked="" type="radio"/> Can be performed</p>	<p>1</p>
<p>CHECKS WITHIN THIS PROCEDURE</p> <ul style="list-style-type: none"> • Full review of laws, by-laws, arrangements and controls governing the register 			
<p>2.1.4 Security of the central IT environment</p>	<p>ICT access logs, configuration and change controls</p>	<p><input type="radio"/> Cannot be performed</p>	<p>8</p>
<p>CHECKS WITHIN THIS PROCEDURE</p> <ul style="list-style-type: none"> • Access management • Change controls • Action logging and audit trail • Data integrity and quality • Stability, availability and continuity • Change and maintenance management • Legal and organisational maintenance framework 			

- General security and data protection

2.1.3 Verify register extracts and historical displays Historical and change records Cannot be performed 5

CHECKS WITHIN THIS PROCEDURE

- Process of public display by polling station
- Pre-election closing of the register
- Consistency of displayed data with the register
- Consistency of extracts used with the register
- All current and historical data, by period

LEVEL 2 · LOCAL UPDATING

2.2.1 Legal review — local-update framework Publicly available legal norms Can be performed 1

CHECKS WITHIN THIS PROCEDURE

- Full review of competences, deadlines, remedies, decision trails and controls in updating

2.2.2 Abuse risk in change authorisation Access logs and change records Cannot be performed 2

CHECKS WITHIN THIS PROCEDURE

- Map of entry / deletion / amendment rights by authorisation
- Quality of access-log security during updating

2.2.5 Officials' authority and training Internal change records and training documents, held by the authorities Cannot be performed 3

CHECKS WITHIN THIS PROCEDURE

- Legal review of officials' authorisations
- Process of receiving changes, drafting and forwarding decisions
- Quality of training vs required competences

<p>2.2.6 Resources for updating</p>	<p>Internal resource records, held by the authorities</p>	<p><input type="radio"/> Cannot be performed</p>	<p>1</p>
<p>CHECKS WITHIN THIS PROCEDURE</p> <ul style="list-style-type: none"> • Material and financial resources for updating and how they are used 			
<p>2.2.7 Integrity of hiring</p>	<p>Recruitment / HR records, held by the authorities</p>	<p><input type="radio"/> Cannot be performed</p>	<p>1</p>
<p>CHECKS WITHIN THIS PROCEDURE</p> <ul style="list-style-type: none"> • Recruitment and engagement of officials who maintain the register 			
<p>2.2.4 Review of inspection supervision</p>	<p>Inspection-supervision reports</p>	<p><input type="radio"/> Cannot be performed</p>	<p>1</p>
<p>CHECKS WITHIN THIS PROCEDURE</p> <ul style="list-style-type: none"> • The inspection process and follow-up on ordered measures 			
<p>LEVEL 3 · THE SOURCE REGISTERS</p>			
<p>2.3.1 Legal review — source-register framework</p>	<p>Publicly available legal norms</p>	<p><input checked="" type="radio"/> Can be performed</p>	<p>1</p>
<p>CHECKS WITHIN THIS PROCEDURE</p> <ul style="list-style-type: none"> • Full review of the normative framework governing source registers 			
<p>2.3.7 Security of the source-register IT</p>	<p>Access logs and controls of the source systems</p>	<p><input type="radio"/> Cannot be performed</p>	<p>8</p>
<p>CHECKS WITHIN THIS PROCEDURE</p> <ul style="list-style-type: none"> • Access management • Protection against unauthorised changes 			

- Action logging and traceability
- Data integrity and quality
- Stability and continuity
- Change and maintenance management
- Legal and organisational maintenance framework
- General security and data protection

2.3.4 Officials' conduct in residence and civil changes

Change records and records of officials' actions

○ Cannot be performed

4

CHECKS WITHIN THIS PROCEDURE

- Recording life-fact changes into source registers
- Recording residence changes
- Dual-citizenship acquisition process
- Data exchange with competent authorities

What this means

A LIMITATION OF SCOPE

On the evidence made available, the audit cannot reach a conclusion on the accuracy or integrity of the register. This is a limitation of scope — not a finding that the register is sound, nor that it is flawed, but a record that the checks could not be carried out.

What can be done now

- Legal review of the rules governing the register, at all three levels
- First intake and preliminary review of citizen complaints, one at a time
- Looking up individual records in the register, civil registries and residence records

What is missing

- Any analysis of the register as a whole (no aggregate access)
- The history of changes — basis, date, official, decision number
- Cross-referencing against source and check registers
- System logs and security configuration
- A statistically representative field sample

The methodology's own threshold. Data from any single register are not sufficient grounds for a conclusion where cross-checking with another register is technically possible. The individual look-ups now available therefore cannot, on their own, meet the standard the Commission set for a finding — they can frame the work, not complete it.

Annex — data access on record

View = can be seen, one record at a time. **Aggregate** = can be analysed across the register. **Verify** = can be independently confirmed. No aggregate or verification access has been granted for any category.

DATA / RECORD	VIEW	AGGREGATE	VERIFY
UNIFIED VOTER REGISTER			
Individual current voter data (name, JMBG, residence, polling station, passivisation, IDP)	Yes	No	No
Record of changes (basis, date, official, decision number)	No	No	No
Legacy reporting module (missing / incorrect data)	No	No	No
ICT system logs (traces of unauthorised access)	No	No	No
SOURCE REGISTERS			
Current residence — permanent and temporary	Yes	No	No
Previous residence; passivisation of addresses	No	No	No
Civil registries — births, deaths, marriages	Yes	No	No
Citizenship — yes/no search by JMBG	Yes	No	No
Citizenship — full records; IDP; legal capacity; prison sanctions	No	No	No

DATA / RECORD	VIEW	AGGREGATE	VERIFY
CROSS-CHECK REGISTERS			
Inspection reports; statistics (SORS); address register; pension; health; tax; ID and passport	No	No	No

Sources. Adopted Act on the Audit Procedure (methodology of the Commission for the Revision, Verification and Control of the Accuracy and Updating of the Voter Register); Commission data-access record. The 69 checks counted here are the sub-procedures enumerated in the methodology, grouped under 21 procedures. Access status reflects Article 22j of the Law on the Unified Voter Register and the Commission's recorded access as provided.