

# Possibility and Prospect for the Use of AI in the Elections of the Philippines: An Analysis of the Findings from the ANFREL's Final Report of the 2025 Philippines National and Local Elections

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**Abstract:** *The 2025 Philippine midterm elections constituted a landmark experiment in technology-mediated democratic governance, combining new Automated Counting Machines (ACMs), internet voting for overseas Filipinos and pervasive social media campaigning. This paper examines the interplay of artificial intelligence (AI) and digital tools with legal frameworks, civil society and electoral administration in the Philippines, drawing on the Asian Network for Free Elections (ANFREL) Final Report of the 2025 Philippine National and Local Elections. It analyses four principal domains: the evolution of election automation and regulatory institutionalisation; the deployment of AI for social media monitoring, disinformation detection and voter targeting; the structural democratic implications of technology adoption, including information inequality and algorithmic bias; and the governance challenges of aligning technological innovation with legal accountability and civic education. Findings demonstrate that while ACMs achieved a 99.997% audit accuracy and voter turnout reached a historic 82.2%, significant regulatory blind spots persist, particularly concerning anonymous digital actors. The paper concludes that AI-based electoral governance requires a multi-layered framework integrating institutional legitimacy, civil society oversight and media literacy.*

**Keywords:** *artificial intelligence; electoral governance; disinformation; automated counting machines; social media monitoring; digital democracy; media literacy; algorithmic bias*

## 1. Introduction: Digital Transition in the Elections of the Philippines and Challenges of AI

### 1.1. The Point Where the Elections of the Philippines Meet the Digital Revolution

The Philippines is undergoing digitalisation of the election management system and political communication environment, like other advanced democracies in East Asia such as South Korea and Taiwan in the 21st century. The 2025 midterms were particularly significant as they marked the first major electoral exercise since the introduction of new Automated Counting Machines (ACMs) and internet voting for overseas Filipinos (ANFREL 2025, p.15). With the great evolution of digital technology and the change to the democratic system interlocked, the Philippines has been paid special attention to as a new testbed of technological innovation in elections.

The technological innovation clearly contrasts with paper-based and offline election management associated with traditional manual elections, power inheritance and structural election fraud. In 2025, the total number of voters was 69.63 million and voter turnout was historically high at 82.2 percent (ANFREL 2025, p.11, p.74). It was also noted that young

and first-time voters were visibly active, particularly on social media platforms, during the recent elections (ANFREL 2025, p.93).

### 1.2. Social Network and Mobile-Based New Electoral Culture

The Philippine political communication environment has been greatly shifted from offline campaigns and physical mobilisation to mobile and digital platform-based communication. The Final Report says that almost 80% of the population of the Philippines is on social media and Filipinos spend more time using the internet than almost any other country in the world (ANFREL 2025, p.65). The campaign heavily concentrated on online voter targeting and the creation of Social Networking Services (SNS) based content.

Thanks to a collaborative monitoring and analysis platform supported by automation and some machine learning, electoral stakeholders such as election camps, election administrations, monitoring groups and media could develop tailored strategies based on big data and information analysis. The social media activity of senatorial candidates and party-list groups was collected and archived from February 9, 2025, through May 24, 2025, encompassing the full campaign period, Election Day and the immediate post-election period. 60,934 posts over this time period were catalogued and anal-

ysed, while a total of 294 unique social media accounts across Facebook, Instagram, TikTok, X (formerly Twitter) and YouTube were monitored (ANFREL 2025, p.137, p.138).

In this new electoral culture, Filipino voters are not merely information receivers. They are active participants creating political discourses by posting comments and questions and resending posts on SNS. This is a new form of so-called “digital democracy” and the case of the Philippines demonstrates its superior spread of technology over other Southeast Asian countries and the social internalisation phenomenon.

### **1.3. Implications of Introducing AI-Based Technology: Social Trust and Restructuring of Norms**

Four implications were noticed from Artificial Intelligence (AI) technology or a technology platform with AI-assisted features in the 2025 elections. The first implication is the possibility of real-time tracing and predicting the flow from a political discourse through individuals’ messages on the discourse to changing public opinion (ANFREL 2025, p.138–p.147). Secondly, a monitoring system has the potential to proactively detect and prevent disinformation such as deepfakes and false videos, as well as defamation, hate speech and incendiary content (ANFREL 2025, p.158, p.163). Third, the quick spread of AI may increase the risk of information asymmetry and abuse. The report points out that disinformation and antidemocratic narratives in Philippine elections have often originated from informal networks such as anonymous influencers, partisan media pages and coordinated inauthentic accounts rather than candidates themselves (ANFREL 2025, p.166). Lastly, the report implies that without cultivating social capacity such as trust in technology, securing transparency and civic media literacy education, the abuse of AI or relevant technologies may jeopardise public trust in democracy itself (ANFREL 2025, p.101, p.133, p.169).

The report emphasises that the Commission on Elections (COMELEC)’s policy on regulating misinformation generated by AI, SNS and other digital platforms has been continually reviewed in order to correspond to global electoral integrity. In particular, COMELEC Resolution 11064 (2024) stipulates transparency, accuracy and responsibility of AI or SNS election campaigns, while COMELEC has established Task Force Katotohanan, Katapatan at Katarungan (KKK) sa Halalan, which guides the use of social media, artificial intelligence and internet technology in the electoral context (ANFREL 2025, p.98, p.163).

### **1.4. Experiments in Democracy and Technology Governance**

The following sub-sections first describe the design and deployment of the 2025 election observation mission, then outline the specific technological tools applied and finally draw out the broader democratic implications of these experiments.

#### **1.4.1 Experiments in Democracy and Technology Governance with the 2025 Elections**

The 2025 Philippine elections resonate with the international community with a symbolic and multi-layered message. An International Election Observation Mission (IEOM), comprised of 21 observers, was deployed in 11 main regions and conducted a comprehensive observation of the entire process of the elections, including prior preparations, voting day, counting and post-election processes. They analysed election management performance, participation of civil society, technology infrastructure, fairness and accessibility of each region (ANFREL 2025, p.21–p.29).

International organisations, civil society organisations and media collaborated to establish a digital data-based monitoring system. They comprehensively analysed discourses generated from unofficial and anonymous accounts as well as official election campaigns, utilising both AI and machine learning-based data analysis and field verification (ANFREL 2025, p.54–p.60). They conducted their observation not merely as a selective or temporary evaluation. Rather, they observed the entire electoral cycle, such as prior preparation, voting, counting and post-election evaluation through both machine and human verification systems.

Several technologies were implemented in the 2025 elections in terms of election management, election campaigns and election observation. The report evaluates these technological experiments as both positive and negative. For example, the automated election system, including the Random Manual Audit (RMA), was implemented effectively and achieved 99.997% accuracy, reinforcing public confidence in the technical process (ANFREL 2025, p.11). On the other hand, however, there were several incidents where candidates warned the public against AI-generated or manipulated photos and videos of themselves circulating online (ANFREL 2025, p.158). Therefore, the most urgent homework of the Philippine elections is not technological innovation itself. Rather, it is how new technologies, including AI can be harmoniously connected with such issues as political fairness, public trust, digital ethics and social equality.

### **1.5. The Objective of This Paper**

The objective of this paper is to examine the interchange and interaction among the legal and administrative systems of the Philippines, civil society and technological innovation under an unprecedented AI- and digital-based election environment. This paper explores the history of the electoral system of the Philippines in terms of technology. It also looks into actual cases of technology application, including AI and its effect on governance as well as challenges to systemisation of technology and prospects.

## 2. The Technological Evolution of Philippine Elections and the Policy and Institutional Context of Technology Adoption

### 2.1 ICT Development and Automation Transition in Philippine Elections

#### 2.1.1 Traditional Manual Vote Counting and Its Background

In the Philippines, election management relied on manual and paper-based voting and counting until the end of the 20th century. People blamed this manual practice for frequent election fraud, delayed counting and election disputes. It used to take three to four weeks to announce counting results in the 1990s. Moreover, there were many allegations about vote-buying, fraud, coercion and manipulation.

After the People Power movement in 1986, there were voices for adopting ICT to restore public trust in the election system and to increase efficiency. In this vein, an automated electoral system was first introduced in 2010 (ANFREL 2025, p.37). In other words, public demand for credibility and fast counting was a driving force for digitalisation. It is also important to note that political and social trust and reform of the legal system were repeatedly highlighted along with discussion on adopting ICT.

#### 2.1.2 Evolution of Automation Technology and the 2025 ACM

In 2025, the most recent ACM (Automated Counting Machine) was deployed in every polling station across the country. The new ACMs combine elements of the previous direct recording system by including machine-readable paper ballots and other features (ANFREL 2025, p.37). In conjunction with ACM, satellite internet was also set up to support the transmission of votes in remote areas, helping to mitigate concerns around delayed transmission and connectivity issues, building on progress made in the 2022 election (ANFREL 2025, p.52). COMELEC later reported a 99.997% accuracy rate from the RMA, reinforcing trust in the automated election system. While stakeholders generally expressed confidence in COMELEC's handling of results, some recommended greater transparency in the transport and custody of ACMs and increased access for independent observers during audits (ANFREL 2025, p.125).

Technologically, the 2025 elections saw advancements in the deployment of new ACMs provided by Miru Systems (ANFREL, 2025, p.37–p.52; COMELEC, 2024). While the machines generally performed well, there were still operational issues such as transmission delays, technical issues and voter confusion due to inadequate staffing and crowd management in certain polling stations. These issues point to the need for continued investments in electoral infrastructure, better training for electoral board members and a reexamination of cur-

rent operational protocols—especially regarding crowd control and voter queuing (ANFREL 2025, p.126).

### 2.2 The Digital Electoral Environment and the Institutionalization of Regulation

#### 2.2.1 The Deepening of COMELEC-Centred Technological Regulation and Administrative Reform

As an independent constitutional body, COMELEC oversees the conduct of elections through different oversight functions. Two key responsibilities of the election management body are regulatory oversight and technological oversight. The first includes monitoring social media, while the latter responsibility is to oversee voting technology, including automated counting machines (ANFREL 2025, p.49). The following are the key legal measures established between 2024 and 2025.

##### COMELEC Resolution No. 11064 (2024)

COMELEC Resolution No. 11064 (2024) is the first official and independent regulation in the Philippines that governs online election campaigning, online disinformation and the use of generative AI. It requires the registration and transparency of official social media accounts and digital campaign activities used by candidates and political parties, sets rules for labelling AI-generated disinformation, defines prohibited acts and sanctions, establishes enforcement procedures and provides for cooperation with social media platforms and civil society. While upholding the fundamental principle of freedom of political expression, the resolution specifically identifies types of content and conduct that may mislead voters, spread disinformation, incite violence or undermine electoral integrity, with the goal of ensuring effective deterrence, fairness and greater transparency (ANFREL 2025, p.163–p.164).

##### COMELEC Resolution No. 11104

COMELEC Resolution No. 11104 was established to enhance the role and right of the COMELEC in combating abuse of state resources and vote-buying in Philippine elections by reorganising a temporary task force, named “Task Force Kontra Bigay” into a permanent body, named “Committee on Kontra Bigay”. The resolution strictly bans the use of public resources, facilities, vehicles and government personnel for election campaign purposes. It also prohibits electoral involvement of public servants and incumbent officials' relatives. The Committee has been mandated to issue show-cause orders. It also works with civil society, government agencies and the private sector to monitor and investigate election-related violations—providing a stronger safeguard against widespread misuse of resources and vote-buying observed in recent elections (ANFREL 2025, p.39, p.45, p.82–83).

##### The Task Force KKK (Katotohanan, Katapatan at Katarrangan sa Halalan)

The Task Force KKK is a specially dedicated unit created for the 2025 elections. Under Resolution 11064, it oversees online

campaigning, regulates and prevents the use of social media, AI and digital tools and combats the spread of election-related disinformation. It is mandated to register and verify official social media accounts of candidates and parties, ensuring transparency in digital and AI-generated content and conducting rapid responses to false or malicious information. KKK works closely with major tech platforms like TikTok, Meta and Google, as well as local fact-checking civil society organisations, to safeguard election fairness and integrity (ANFREL 2025, p.97–p.99).

Simple administration focused on compliance and surveillance is clearly giving way to a multi-layered structure that integrates ICT and AI know-how with civil society-based monitoring, regulation and governance in response to technological change. In this vein, the report recommends that COMELEC should enhance its real-time monitoring of social media during the election period by investing in digital monitoring tools and collaborating with credible third-party fact-checkers, platform companies and research institutions to identify emerging threats, inauthentic behaviour and coordinated disinformation efforts (ANFREL 2025, p.170).

### **2.2.2 Citizen Monitoring and Education Systems Related to AI and Digital Utilisation**

The report emphasises the importance of media literacy education several times in consideration of the extreme influence of disinformation on elections. It recommends launching a nonpartisan media literacy campaign focused on spotting AI-generated or harmful content and understanding reporting mechanisms so that individuals of all ages can benefit from possessing these important skills (ANFREL 2025, p.169). The report also mentions COMELEC's effort to make the performance of the new ACM known to the public and guarantee citizens' observation of the voting and counting process.

For example, COMELEC demonstrated its strong commitment to increasing transparency through livestreamed audits, source code reviews and greater communication with local civic organizations (ANFREL 2025, p.11). It also implemented a multi-layered system that included the transmission of encrypted results from Automated Counting Machines (ACMs), the public release of transmission logs and the conduct of a RMA (ANFREL 2025, p.125).

Such an effort embodies a triple system of checks and balances: technological transparency (disclosure), citizen empowerment (media literacy) and social oversight (public participation). In other words, a technology such as AI technology contributes to enhancing the democratic nature of elections only when accompanied by institutionalization and socialization, which aligns with the global trend in contemporary election administration.

## **2.3 The Use of Technology by Different Election Stakeholders**

### **2.3.1 The Use of Technology by Campaign Organizations and Political Parties**

Political parties and candidates actively used digital campaigning in the 2025 Philippine elections, with most voters relying on online platforms. They largely utilised social media for campaigning, information sharing and connecting with potential voters. By posting targeted messages and content, they discussed campaign events, political endorsements and key public policy themes (ANFREL 2025, p.99–p.100). Considering the social impact of AI-generated images and videos—including their rapid spread, heightened influence and fragmentation—it is expected that election campaigns will increasingly adopt AI and social media-based strategies in the future.

### **2.3.2 The Use of Technology by Civil Society and Monitoring Organisations**

Technological progress has gone beyond the domain of administration and politics. It now contributes to establishing a data monitoring system through citizens' participation. For example, the Asian Network for Free Elections (ANFREL) used the KoBo Toolbox for real-time data collection and reporting, enabling timely and accurate submission of observations during the preelection period, on Election Day and during the vote counting process (ANFREL 2025, p.28). ANFREL, in collaboration with The Carter Center (TCC), also monitored social media campaigning of senatorial candidates and party-list groups (ANFREL 2025, p.28). It used an AI-featured tool, called "Junkipedia" in cataloguing online posts and tracking lists of social media accounts.

Since 2022, the National Citizens' Movement for Free Elections (NAMFREL) has utilized the NAMFREL App as a key tool for monitoring election result transmission. The app serves multiple functions, including a reporting tool, signal detection and strength testing and image capture of Election Returns (ERs). For the 2025 midterm elections, the app was further enhanced to include Voter Verified Paper Audit Trail (VVPAT) QR scanning for registered volunteers and crowd-sourced Election Transmission (ET) QR code scanning, contributing to a more transparent and participatory verification process (ANFREL 2025, p.59).

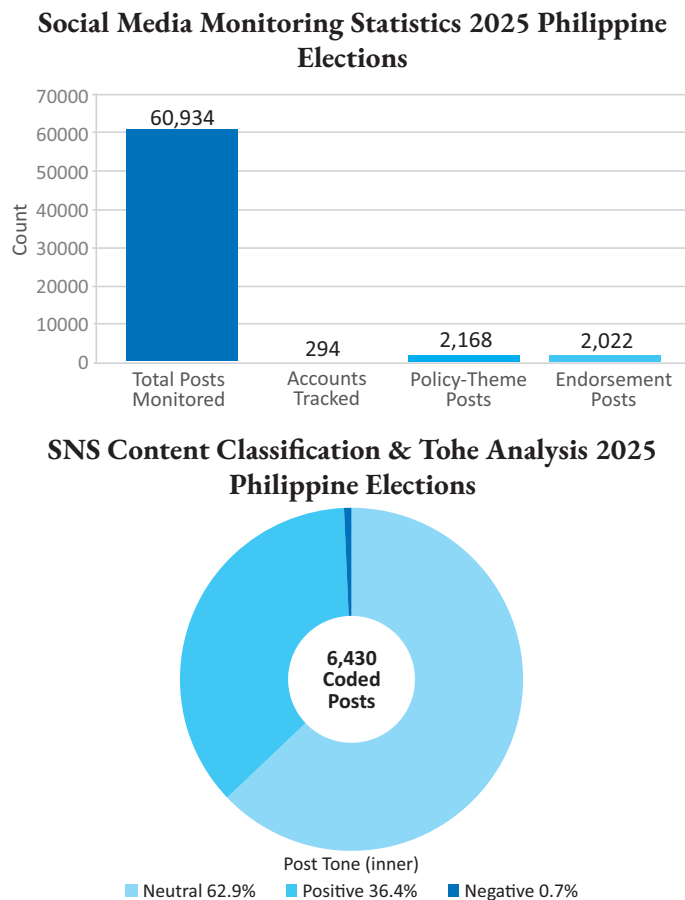
## **2.4 The Structural Implications of Technological and Policy Changes**

### **2.4.1 The Legal-Administrative Integration of Electoral Systems in the Digital (AI) Age**

Some of the technologies applied in the 2025 elections, including active use of online platforms and the partial introduction of AI, seem to have a positive impact on various aspects of electoral governance. Social media monitoring, the use of ACM and the internet voting system contributed to strengthening transparency of administration, credibility of election results,

citizens' participation and accessibility of elections. On the other hand, however, the report also points out that the introduction of new technologies may bring about new challenges and risk the credibility of elections. For example, there is a blind spot in the regulation of SNS use. Currently, only official accounts such as registered campaign accounts of political parties and candidates are being regulated (ANFREL 2025, p.166). However, the chance is high that false information and manipulated content are produced and spread through unofficial, inauthentic or supporters' accounts and influencers.

**Figure 1: Digital Electoral Environment - Key Metrics from the 2025 Philippine Midterm Elections**



Source: ANFREL (2025). *High Turnout, Low Competition: Resilient Participation in a Constrained Electoral Landscape – 2025 Philippine Elections Final Report*. Bangkok: ANFREL. (pp. 137–138, 140, 145)

### 3. The Impact, Structural Implications and Future Prospects of Technology Adoption

Section 3 analyses the impact of technology adoption along three dimensions. Sub-section 3.1 examines immediate technological effects on counting efficiency, information dissemination and innovation in voter targeting. Sub-section 3.2 turns to structural democratic consequences, including surveillance, inequality and regulatory blind spots, while sub-section 3.3 outlines future governance and policy tasks for institutional and civic actors.

#### 3.1 Technological Effects: Counting Efficiency, Information Dissemination and Innovation in Voter Targeting

##### 3.1.1 Strengthening Electoral Credibility through Automated Counting

ACM (Automated Counting Machines) demonstrated in the 2025 elections how technology can contribute to increasing electoral credibility. ANFREL observed one of the RMA sessions and found the process to be professionally managed and technically sound. COMELEC later reported a 99.997% accuracy rate from the RMA (Random Manual Audit), reinforcing trust in the automated election system (ANFREL 2025, p.125).

COMELEC implemented a multi-layered system that included the transmission of encrypted results from ACMs, the public release of transmission logs and the conduct of RMA. In the post-election period, COMELEC also launched a broad-based review and assessment of technical performance, in collaboration with various stakeholders, including civil society organizations, election watchdogs and international observers (ANFREL 2025, p.125–p.126).

The implementation of ACM and RMA not only increased efficiency in electoral processes but also reinforced public confidence in the fairness of the electoral system questioned for many years (ANFREL 2025, p.11). The 2025 elections were generally well-administered, with voter turnout reaching a record 82.2% (ANFREL 2025, p.11, p.13). According to the report, the 2025 midterm elections reflected notable progress in terms of transparency, public trust and institutional accountability (ANFREL 2025, p.126).

The success of automated counting does not necessarily mean that adopting a technology directly results in public trust. The core lesson from the Philippine case is ACM was recognised not as a “black box”, but as an efficient system publicly verified, since the counting results were cross-checked by both machines and civil society. In order to maintain public trust in technology, COMELEC must ensure that precinct-level results, machine transmission logs and audit outcomes be published in a transparent and timely manner (ANFREL 2025, p.132).

##### 3.1.2 Social Media: Voter Segmentation and Tailored Campaigns

Observers noted that candidates were highly active on social media throughout the campaign period (ANFREL 2025, p.139). Candidates and party-list groups largely utilized social media for campaigning, information sharing and connecting with potential voters (ANFREL 2025, p.137). ANFREL catalogued 60,934 posts from all 66 senatorial candidates and 148 of the 156 party-list groups by using an AI-featured tool, called “Junkipedia”, monitoring a total of 294 unique social media accounts across Facebook, Instagram, TikTok, X (formerly Twitter) and YouTube (ANFREL 2025, p.138). This activity implies that AI has the potential to create tailored policy messages, target segmented groups of voters, understand

issues immediately and detect changes in public sentiment on social media.

Out of the 6,430 posts in the coded corpus, 2,168 posts (33.7%) on SNS meaningfully discussed at least one public policy theme, including economy, public service provision, human rights and education (ANFREL 2025, p.145). 2,022 posts (31.4% of all coded posts) contained an endorsement of some kind. Overall, democratic content made up 71.2% of the coded corpus of social media posts, compared to harmful content at 1.9%. Similarly, monitors tagged 36.4% of the coded posts as having a positive tone, compared to only 0.7% of the posts as having a negative tone, with the remaining 62.9% of coded posts assumed to be neutral in tone (ANFREL 2025, p.140).

As seen above, AI has the potential to analyse SNS posts, public sentiments and changes in public opinion. AI-based election campaigns are not aimed at totalitarian mass persuasion. Rather, it means the spread of information strategy for personalisation and segmentation. It can also promote policy-oriented debates, targeting each group of a particular interest, rather than sending voters one-way messages. On the other hand, however, intensive micro-targeting and constant personalised messaging may contribute to voter fatigue and perceived intrusiveness, as broader studies of targeted political communication have suggested (Bode & Vraga, 2015; Kreiss & McGregor, 2018).

### **3.1.3 AI Response and Detection of Disinformation and Manipulation**

The most useful function of AI is to promptly detect false information such as deepfakes and doctored images and text and risks. The report says that very few instances of circulating fabricated information and false narratives were observed from official and registered SNS accounts (ANFREL 2025, p.158). At the same time, the report also points out that disinformation and antidemocratic narratives in Philippine elections have often originated from informal networks such as anonymous influencers, partisan media pages and coordinated inauthentic accounts (ANFREL 2025, p.166).

Candidates and party-list groups made efforts to correct false narratives with factual information. Multiple candidates warned the public against AI-generated or manipulated photos and videos of themselves circulating online during and after the campaign period (ANFREL 2025, p.158). The report expresses its concern about blind spots of regulation that unofficial campaign platforms (e.g., affiliate or supporter pages) and other influential actors in the online campaign environment (e.g., news/media outlets and journalists, non-candidate politicians, religious/cultural groups, social media influencers, civil society leaders, etc.) are not subject to the regulations of COMELEC Resolution No. 11064. These pages help shape the digital campaign space as a whole and it is reasonable to suspect that they may post problematic content at a higher rate than official campaign accounts (ANFREL 2025, p.167).

AI can be misused as a tool for content manipulation, while it detects potential risks by analysing deep learning-based images and text and detecting abnormal patterns. Minimising risks caused by AI requires a comprehensive policy covering a technical verification system, civic education, transparent AI usage labelling and anonymous account management.

## **3.2 The Structural Impact of AI on Democracy and Its Social Issues**

### **3.2.1 The Duality of Regulation, Surveillance and Governance**

Under COMELEC Resolution No. 11064 and other legal grounds, COMELEC may request platforms remove or block content that misleads voters about polling places, voting dates or ballot security; circulates fake election orders; spreads false reports that undermine trust in the election process; or uses coordinated fake accounts to amplify misinformation (ANFREL 2025, p.163). Moreover, online election campaigning, online disinformation and the use of generative AI are regulated in COMELEC Resolution 11064 (ANFREL 2025, p.98). On top of that, COMELEC has established Task Force KKK sa Halalan to enforce its rules on the use of social media, the internet, digital technologies and artificial intelligence for online campaigning and prevent misuse for election disinformation (ANFREL 2025, p.6).

There is no doubt that it is necessary to reinforce regulations on the abuse of technology. At the same time, however, reinforced regulation has the potential to entail new challenges to democracy, such as overregulation, a chilling effect on freedom of expression and personal information infringement. The future model of an AI-based electoral governance system should be a multilateral governance system structurally combining administrative institutions, civil society, technology companies and media literacy education.

### **3.2.2 Information Inequality, Misuse of Technology and Blind Spot**

The report mentions several times about unequal access to information and technology. It refers to a gap in access to information and technology by region and group of people. For example, people in remote areas, low-income people or older people may be isolated from the benefit of SNS campaigns. The report also talks about negative aspects of digital campaigns. Anonymous influencers and partisan media run unofficial campaign platforms where disinformation and antidemocratic narratives are produced, but regulations are unable to reach out (ANFREL 2025, p.166–167).

A digital or AI-based electoral environment may cause a more distinct division in the society. As the benefit of a technology is focused on a particular group or class, a great gap will be created in terms of accessibility to information and capacity for the use of the technology. As a result, politically isolated groups of people will find it more difficult to take part in elec-

tions, which will lead to political polarisation and a deepening of the information gap. Furthermore, with public trust in the technology challenged, the entire election system may be dis-trusted and denied.

### 3.3 Future Outlook: Institutionalisation, Policy and Educational Tasks

#### 3.3.1 Prospects for the Establishment of AI-Based Electoral Governance

The report recommends the COMELEC create or institutionalise a dedicated unit within COMELEC tasked with year-round monitoring of online campaign activity. It also urges the COMELEC to invest in digital monitoring tools and collaborate with credible third-party fact-checkers, platform companies and research institutions to identify emerging threats, inauthentic behaviour and coordinated disinformation efforts. On top of that, it recommends the COMELEC operationalising AI disclosure requirements and recruiting additional personnel with expertise in data analysis, digital forensics and content moderation to effectively implement expanded digital oversight (ANFREL 2025, p.170–p.171). The objective of those recommendations is to establish a sustainable and integrated digital ecosystem for election monitoring and evaluation rather than a monitoring system that is activated only temporarily during elections or specific situations.

#### 3.3.2 Civil Society Engagement, Media Literacy and Data Transparency

The prerequisite for strengthening democratic governance and enabling meaningful innovation through AI and digital technologies is not just civic education, but the ability of citizens to understand and interpret data. The report emphasises three elements as the axis of AI-based governance: Legislative and Administrative Verification System, self-regulatory monitoring and educational initiatives by civil society and expansion of media literacy (ANFREL 2025, p.168–p.171). AI governance requires data disclosure, a guarantee of citizens' right to know and education–participatory monitoring and literacy enhancement.

## 4. Challenges in Technology (AI) Adoption and Socio-Institutional Implications: Critical Diagnosis and Future Tasks

Technological elements seen in the 2025 elections brought important changes to the qualitative foundation of democracy and the way civil society responds but also caused structural tension and debates over the boundary between freedom of expression, inclusivity and gaps and transparency and credibility of technology. The case of the Philippines shows that combining democracy and technology is not just about efficiency or convenience. It also involves institutional design, social values and the ways different stakeholders cooperate and sometimes come into conflict.

## 4.1 The Institutional Structure and Practical Limitations of AI-Based Election Administration

### 4.1.1 The Lack of Legal, Institutional and Ethical Frameworks and Their Alignment with Policy

The COMELEC has taken several legal measures to manage online election campaigns, misinformation on social media and doctored images and videos by AI, as well as to team up with social media platforms such as TikTok, Meta and Google. For example, it established COMELEC Resolution 11064 (2024) and Task Force KKK sa Halalan, which guides the use of social media, artificial intelligence and internet technology in the electoral context (ANFREL 2025, p.98–p.99).

Despite COMELEC's effort, there are four areas for improvement associated with digital policies and legal frameworks. One is unclear concepts of some terms in the regulations. For example, some terms such as “mis/disinformation” and “AI-generated content” are not clearly defined. This conceptual ambiguity contrasts with more elaborated typologies, such as Wardle and Derakhshan's (2017) framework of information disorder, which distinguishes between misinformation, disinformation and malinformation. Another challenge is COMELEC's limited enforcement capability, which has been pointed out several times in the report. The third area is related to data privacy. The extent to which COMELEC is permitted to collect data during social media monitoring is unclear. Lastly, the report recommends that COMELEC clarify enforcement process timelines and publish regular enforcement reports (ANFREL 2025, p.167–p.171).

Democratic trust and substantial governance cannot be achieved by technological innovation alone. The speed of adopting a new technology must be supported by legislature and system. A vacuum of rules is likely to lead to abuse of technology and enlargement of social inequality. Technology (AI) regulation and ethics frameworks must be established based on the principle of “Legality–Legitimate Aim–Proportionality”.

### 4.1.2 Structural Weaknesses in Administrative Enforcement and Oversight Mechanisms

The success of digital or AI-based electoral administration lies in a unified monitoring system from the central to the local and frontline levels, standardised protocols and skilled enforcement personnel. A policy alone cannot deal with complex risk signals throughout the digital landscape, including rapid increases in misinformation, manipulation of algorithms and exploitation of blind spots. Strengthening the practical capabilities of organizations at all levels and fostering a culture of digital norms are the prerequisites for digital or AI-based electoral administration.

The COMELEC, along with Task Force KKK and civic monitoring groups, strengthened multi-level monitoring systems to ensure the integrity of the online space in the 2025 elections. They tried to detect electoral fraud, technical fail-

ures and the spread of misinformation at an early stage and to respond swiftly. Nevertheless, the report repeatedly mentions that monitoring informal (unregistered/anonymous/supporter-operated) accounts is extremely difficult, which election management agencies (COMELEC) or civic monitoring organizations consider as their most critical challenge. The report also implies that there is insufficient technical and human capacity to monitor in real time and swiftly delete, block and respond to election-related disinformation, digital campaigns, AI-generated manipulated content and other issues occurring in social media and internet spaces (ANFREL 2025, p.169–p.171).

## **4.2 Technology (AI) and Democratic Citizenship: The Coexistence of Social Trust, Acceptance and Resistance**

### **4.2.1 Trust and Distrust in Civil Society: Ambivalent Public Opinion Structure**

The introduction of a new technology can be viewed in both positive and negative ways in any society. AI and digital technology used in elections may be viewed positively in terms of speed, customisation, accessibility and young voter mobilisation. In particular, young and first-time voters were visibly active on social media platforms during the 2025 elections (ANFREL 2025, p.93). On the other hand, mistrust in the technology and the entire elections using it can be amplified with issues such as misinformation, social surveillance, data abuse and privacy violation arising.

In order to secure social trust in elections through a new technology, a continuous forum for consultation, discussion and public dialogue with civil society must precede the acceptance of the technology. A technology is a means, while social trust is earned by social consensus and procedural legitimacy. To win social trust through technological innovation, a society should establish shared governance among civil society monitoring groups, media and EMBs and achieve their participation in policy-making and transparent public release.

### **4.2.2 Institutionalization of Civic Education and Media Literacy**

The report recommends applying a comprehensive strategy and policy in the field, including AI-powered content labelling, media literacy education, third-party fact-checking, citizen participation and campaigns (ANFREL 2025, p.169–p.170). An AI-based society must be preceded by citizens' capacity building with critical media and data literacy in order to cope with a variety of potential challenges. In other words, the democratic foundation of an AI-powered society lies in citizens' collective information sovereignty, including information literacy, verification habits and digital self-control.

## **4.3 Social Inequality and Technology (AI): Digital Divide, Information Bias and Blind Spots**

### **4.3.1 Information Inequality Structure: Deepening the Digital Divide**

The report refers to remote and indigenous communities, older persons, persons with disabilities and illiterate people as vulnerable groups of people disadvantaged by the current electoral system (ANFREL 2025, p.93, p.111). With AI activated in earnest, some may enjoy more information and benefit thanks to AI, while others may become isolated from getting information and feel their voices unheard in politics. This gap widening will worsen mistrust in and indifference to politics, which leads to excluding isolated groups of people from participating in elections and politics. The political blind spot of isolated people is a key piece of homework that democracy should tackle in the AI age.

### **4.3.2 Algorithmic Bias and the Challenge of Achieving Justice**

In case that an AI-based analysis is biased about a particular group of people or a particular agenda, this algorithmic bias may lead to internalization of inequities across the entire technological and social structure, weakening trust in political decision-making and reproduction of social discrimination.

The report discusses the media environment of the Philippines and its role in disseminating information during the election period. It talks about the media's bias in terms of its coverage of issues, disparity of media exposure and cultural and social biases as a result of media bias. The report says that during the midterm elections, the narratives presented in the media remained largely dominated by issues of political dynasties and the rivalry between Marcos and Duterte—while, in reality, voters required a broader range of information in the lead-up to the election. It also says that female candidates received less media exposure compared to their male counterparts and also faced discrimination in the form of sexist comments in the media and news reporting shaped by cultural and social biases, which tended to portray women only in domestic roles (ANFREL 2025, p.94–p.95). If an AI-powered analysis is based on a biased media environment, for example, the outcome of the analysis can be politically abused.

## **4.4 Technology (AI) and Future Election Governance: Multi-Collaborative Policy Horizons**

### **4.4.1 Multi-level Governance Model and Policy Direction**

It is undesirable for an EMB alone to decide on adopting a new technology. Relying solely on some major platform companies is also problematic. Technology- or AI-based electoral governance must be built in a way that electoral authorities and civil society organisations together build cooperative relationships and mutual trust. For an AI-based electoral governance to be successfully functioning, it is necessary to refer to other countries' good examples and international standards, release election-related information in a transparent manner and reflect citizens' feedback in policy.

The report stresses the importance of collaborating with credible third-party fact-checkers, platform companies and

research institutions to identify emerging threats, inauthentic behaviour and coordinated disinformation efforts. It also recommends regularly publishing public updates and providing data-backed recommendations for regulatory or educational action (ANFREL 2025, p.170–p.171).

#### **4.4.2 Vision for Institutional, Legal and Policy Development**

Introducing a new technology inevitably brings an impact on the society. To ensure the impact is fair to everyone, credible and excludes no one, a clear principle of how the technology will be used should be established. Based on the principle, citizens and experts together evaluate the performance of the technology and ensure that protection of private data and information disclosure are in balance. In the age of AI, the operation of democracy and rules should be redesigned. Moreover, a policy needs to have multiple layers and the ethics of the system should be examined on a regular basis.

The report emphasises clarifying specific AI utilization regulations, protecting personal information, establishing reporting and administrative procedures and institutionalizing civil society evaluation and monitoring systems (ANFREL 2025, p.168–171). In other words, adopting a new technology requires comprehensive innovation and balance, including institutional and legal checks and balances, simultaneous protection of personal information and the right to know, expansion of social education and media literacy and citizen participation in policy development.

### **5. Technology-Based Philippine Elections: Policy and Institutionalization Issues – Legal, Regulatory and Practical Improvement Tasks and Development Directions**

Building on the previous sections, Section 5 synthesises the Philippine experience into four clusters of policy and institutionalisation challenges, elaborating limitations of the current framework, gaps in implementation capacity, tensions between transparency and privacy and concrete directions for reform.

#### **5.1 Limitations of the Current Policy and Legal Framework and the Need for Innovation**

The AI and digital technologies used in the 2025 Philippine elections seemed to shift the paradigm of election administration, campaigns and observation from ‘automation’ to data-driven policy, operations and social monitoring systems. Despite the progress in the development of the current legal and system basis, the report highlights the barriers to further progress, including conceptual ambiguity of laws and policies, dispersion of enforcement power, coordination with constitutional rights such as personal information and discrepancies in actual regulatory effects (ANFREL 2025, p.168–p.171).

COMELEC Resolution 11064 (2024) has innovative provisions for online election campaigns, regulation of misin-

formation/deepfakes/AI-generated content and principles of transparent disclosure. However, due to subtle gaps in statutory interpretation, lack of precedents and cases for unprecedented new technologies and dispersed roles among multi-layered administrative agencies, it was difficult to execute the policies in the field in a consistent and transparent manner. For example, unlike official SNS accounts, which are required to disclose AI content, it was significantly limited in its ability to monitor and track down disinformation campaigns or digital manipulation originating from informal networks such as anonymous influencers, partisan media pages and coordinated inauthentic accounts (ANFREL 2025, p.166–p.167).

On the contrary, the report also talks about citizens’ freedom of expression and data privacy. It recommends codifying proportionality in regulating SNS content and affirming protection of citizens’ political expression (ANFREL 2025, p.168). It also recommends limiting data collection to what is necessary for enforcement and ensuring compliance with Philippine data protection law, although it may seem necessary to investigate personal data for the sake of public benefit (ANFREL 2025, p.170).

If the legal system is not following the pace of technological innovation, this will worsen the issues, including infringement of civil rights, surveillance and security risks and regulatory blind spots. A new technology does not necessarily mean innovation. Building trust in democracy is attained through a transparent legal system and policy philosophy.

#### **5.2 Direction for Strengthening the Practical Implementation Capacity of Policies and Systems**

##### **5.2.1 Tasks for Expanding Administrative and Supervisory Infrastructure and Expert Personnel**

The report highly evaluates the attempt to operate a governance model of COMELEC, Task Force KKK and civil society organisations and to institutionalise social monitoring. Despite such progress, the report also points out that actual administrative bodies such as Political Finance Affairs Department (PFAD) revealed their lack of budget and skilled professionals. It also points out that significant imbalances in on-site monitoring and enforcement were exposed. For example, PFAD has been tasked not only with monitoring campaign expenditures but also with the expanded responsibility of overseeing political parties. Despite its growing mandate, PFAD suffers from serious institutional limitations—including its reliance on short-term contractual staff rather than permanent plantilla positions—undermining institutional memory, operational stability and the department’s ability to perform its oversight role effectively (ANFREL 2025, p.71).

The central government alone cannot achieve effective law enforcement. Local bodies and civil society organisations also should be capable of implementation, oversight and investigation. Effective law enforcement requires constant evaluation and training, an independent data audit system and expansion of feedback loops at all levels.

### 5.2.2 Civic Society and Watchdog Organizations' Policy Participation and Oversight

Civil society organisations, including the National Citizens' Movement for Free Elections (NAMFREL), the Legal Network for Truthful Elections (LENTE) and the Parish Pastoral Council for Responsible Voting (PPCRV), increased the accuracy and speed of their monitoring by using AI and other technologies. They enhanced their performance of checking the fairness of election management and social evaluation by analysing data to find abnormal patterns in the vote counting and transmission process, verifying the authenticity of the VVPAT and Election Returns (ERs) through scanning and validation and automatically detecting fraudulent activities based on reports and surveillance data. In particular, being used in citizen-participated Random Manual Audit (RMA), transparency certification and disclosure of pre- and post-procedures and an SNS-based system for reporting and verifying false information, AI and other technologies functioned not only as a tool for publicity and operation but also for verifying trust (ANFREL 2025, p.54–p.61).

AI-based electoral governance can resolve the issues of blind spots and black box risks only when civil society organisations, independent watchdog organisations and election authorities establish constant policy communication and equal cooperative relationships.

### 5.3 The Challenge of Simultaneously Ensuring Personal Information Protection, the Right to Know and Transparency

In the age of AI, electoral governance is not merely about introducing a technology. It is about legalising a transparent governance frame, including civil information sovereignty, the right to know, privacy and algorithmic accountability for explanation, error disclosure and a protection system for citizen whistleblowers.

A concrete guideline, including clear prior consent from the data subject, explicit specification of the scope of data use, administrative penalties and citizen reporting procedures in cases of misuse or abuse, is required to resolve issues when the Data Privacy Act, Omnibus Election Code and other COMELEC resolutions collide with one another. The report recommends establishing a principle of disclosure of detailed information about AI systems/algorithms, interpretability of policy decisions and prompt responsibility to disclose in case of errors or manipulation (ANFREL 2025, p.169–p.170).

### 5.4 Specific Recommendations and Implementation Tasks for Policy and Legal Development

#### 5.4.1 Field-Centred Integrated Regulation and Dynamic Feedback System

When revising a law or system associated with AI or digital technology, it should clearly reflect the principles of legality (observance of due process), purposefulness (clarification of public interest) and proportionality (prevention of excessive

control). It should also include specific guidelines for respecting the protection of personal information (right to privacy) and citizens' right to know (public interest data processing).

Regional task forces and citizens' evaluation committees should also be established and operated in actual execution. When various errors or reports are received in real time, the data needs to be made 'immediately public and promptly corrected'—in other words, a tight feedback loop of 'error/report → disclosure → correction' must be established.

## 6. Conclusion

AI and other technologies used in the 2025 elections of the Philippines revealed structural risks, including disinformation, algorithmic bias and information inequality, as well as positive accomplishments, such as innovation in efficiency, transparency and voter communication. According to the report, the entire elections were reorganised based on digital technologies with regard to automation of aggregation and civil society monitoring, qualitative improvement of policy communication via social media and expansion of cooperation with platform companies. The actual effect of those technologies was proven in numbers and figures such as high voter turnout, vast voter data and real-time online analysis.

On the other hand, the report points out that there were side effects of the technologies, such as a lack of legal systems, policies, education, on-site infrastructure or the presence of unofficial accounts and deepfakes. To tackle the side effects, the report emphasises policy and governance innovation, civic literacy and education and multi-stakeholder collaboration. The most important lesson learned from the Philippine elections will be the necessity of establishing a multi-layered system that combines social trust, fairness and inclusiveness with civic sovereignty, legal responsibility and education in order to ensure AI-based elections in the future.

Beyond the Philippines, these findings offer a cautionary but instructive roadmap for other developing democracies in South and Southeast Asia that are experimenting with AI-enhanced election technologies under conditions of fragile institutions and contested information environments.

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