

Citizens' Summary: Communications Review of the EEA and Norway Grants 2009-2014

BACKGROUND

The EEA and Norway Grants represent the contribution of Iceland, Liechtenstein and Norway to reducing economic and social disparities and to strengthening bilateral relations with 16 EU countries in Central and Southern Europe and the Baltics.

Communicating what is achieved with the funding from Iceland, Liechtenstein and Norway is key to transparency and accountability. Conveying the values of the overall grants schemes, while at the same time ensuring visibility for the donor countries, is an important part of the work put forward by National Focal Points, Programme Operators and Project Promoters.

This summary draws on an independent review conducted via the external evaluation company Coffey International Ltd. The purpose of the review was to identify good communications results and practices for the EEA and Norway Grants funding period 2009-2014 and provide important recommendations for improved visibility of the Grants.

KEY FINDINGS

Coffey International Ltd. split their findings into three specific areas, concerning (a) the legal requirements laid out in the Regulations / Annex 4; (b) how communications are implemented amongst stakeholders involved in the Grants; (c) effectiveness of communications and donor visibility. Key points across these areas are outlined below:

Legal requirements relating to communications

- Several beneficiary countries perceive the communications requirements laid out in the Regulations / Annex 4 as finite and intentionally do not carry out activities other than those explicitly required. This means that there is scope to enhance the Regulations / Annex 4 by adding a clear explanation that the communications requirements are not intended to set limits to activities and that additional activities are encouraged.
- All beneficiary countries have dedicated websites in national languages and in English. However, the study highlights great variability which undermines the effort of showing the impact the Grants have in a consistent manner.
- The use of social media was one of the most common means of exceeding the communications requirements. Adding this communications channel to the revised requirements might be an option worth exploring.
- National Focal Points, Programme Operators and Project Promoters consider that the communications requirements are clear on their roles and responsibilities. However, this does not extend to the Donor Programme Partners and the Donor States Embassies, as they are not mentioned in the Regulations / Annex 4.

Implementation

- Story-telling is an appreciated approach for reaching wider audiences. However, the creators of the stories (Programme Operators and Project Promoters) often struggle with translating the project results into stories which could be disseminated 'up' and 'out'.
- Overall, the implementation structures for communications are not clearly defined in the Communications Strategies and the corresponding Strategic Reports for 2013 and 2014. There is also very faint evidence (if any) of defined implementation structures in the Communications Plans on programme level.
- Some countries noted that communications on sensitive topics, such as Roma inclusion or domestic violence, is appreciated but that it can bring a significant amount of negative press. This indicates that there is scope for additional guidelines for programmes dealing with sensitive topics.
- There is no consistent approach regarding the available resources and budget for communications among the beneficiary states.
- In many cases, staff taking care of communicating activities either work alone or with a support from another person. However there is often no allocated communications team/person and the people dealing with communications are seldom communications professionals.
- Whilst the cooperation between the levels appears mostly successful, the structure of reporting and follow-up seems to sometimes obscure the exchange of know-how and may lead to unnecessary doubling of efforts. Annex 4 puts an emphasis on a top-down supervision of communications activities without a requirement for the involved actors to report back up the line.
- There is a lack of consistency in the monitoring and evaluation frameworks, which translates into a lack of consistency in the presentation of the information provided across beneficiary countries.

Effectiveness and donor visibility

- The Regulations / Annex 4 do not differentiate between 'internal' target groups (as required to supervise / manage the implementation of the Grants) and 'external' groups. The two main segments should be targeted in different ways: 'internal' target groups with information, and 'external' target groups with promotion aiming to raise awareness.
- One of the main challenges to perceptions and awareness-levels relates to the confusion with EU Structural Funds.
- It is clear that the use of "EEA" abbreviation is the least understood, whilst using the names of the countries or featuring their flags brings more recognition.
- With regards to the branding used, a large majority of NFPs translate the EEA Grants and Norway Grants in their own language. All NFPs and all of the sampled Programme Operators used the Grants' logos in their communications materials, however there were several Project Promoters who did not use the logos at all. Some Project Promoters highlighted that they are required to place several equally sized logos (the Grants', the NFP's, the PO's) on their communications materials, making it confusing, if not impossible, for a layperson to identify the actual source of support.

- The reasons behind the creation of the Grants remain somewhat obscured. There is scope to frame the message in a positive, value-based way, e.g. highlighting that the Grants were created to support certain values and standards.
- The fact that the communications role of the Donor States' Embassies is not mentioned in the Regulations / Annex 4 and the accompanying guidelines presents a missed opportunity. The Embassies are already conducting intensive communications actions (sometimes in cooperation with the National Focal Points), which enhance Donor visibility and highlight the bilateral aspect.

KEY RECOMMENDATIONS

1. Consider an improved model of cooperation in communicating about the Grants, refocusing the reporting obligations, with the actors having the duty to report to higher levels, as opposed to higher levels being obliged to monitor the lower levels.
2. Linked to the above, if the Donors are serious about raising public awareness on the Grants, then it is necessary to take a more focussed approach, for example by concentrating this responsibility at national level rather the current fragmented approach. At the same time, to achieve an impact in the public consciousness it is recommended to consider concentrating responsibility for communicating to the general public at national level, for example by running annual national advertising campaigns, with more significant reach of the public. Additional budget will be required for this activity.
3. To strengthen Donor visibility it is recommended that the Donors consider replacing the "EEA" abbreviation with one that would be better understood by the general public and would remain unchanged in translation to beneficiary states' languages. Options could include various permutations of "ILN" (Iceland, Liechtenstein, Norway).
4. To avoid fragmentation and dispersion of the perceived identity of Donors it is recommended to reduce the plethora of logos and names with which the sponsored projects are currently branded and ensure prominence of the Grants' names and logos. In the revised Regulations / Annex 4, the FMO should be explicit that all actors are encouraged to conduct additional communications activities on top of those listed in the Regulations / Annex 4. This would make it clear to National Focal Points that they are not in breach of the Regulations if they exceed the 'minimum' requirements set in the Regulations.
5. Consideration should be given to developing national portals for the EEA and Norway Grants, similar to the website provided by Lithuania. All information about the programmes and projects could be pulled together in one place, making it a "one stop shop" for any information on the Grants in a given country. Rather than focussing efforts on maintaining a web presence, Project Promoters could instead focus on providing information on their projects according to the template for the national site and could help to ensure that project information is 'sharable' for example by providing visuals and AV clips, including for social media.
6. In order to ensure inclusion of otherwise disadvantaged audiences, include a requirement that all websites presenting the Grants comply with the Web Content Accessibility Guidelines (WCAG) for the visually impaired.
7. The FMO could consider defining a separate budget line reserved for communications activities, for all three implementation levels (national, programme and project). Earmarking

a dedicated budget for communications could be beneficial, especially given that not every institution recognises the importance of hiring a communications professional.

8. Support the development of more consistent national monitoring and evaluation frameworks for communications activities across beneficiary countries. This could, for instance, define example evaluation questions and indicators, on the basis of refined objectives. In practice, monitoring data gathered at project and programme level could be used to feed into this national view of impact. Results could be tracked on a yearly basis to allow an overview of on-going performance.
9. Drawing from this more integrated and purposeful approach to monitoring and evaluation, consideration could be given to developing national / programme impact summaries, which could be shared and reused on websites at all levels, including in publicity material, given that the reporting of impacts appears to be challenge.
10. Consider including the Donor Programme Partners and the Donor states' Embassies, as well as the expectations as to their communication action in the revised Regulations / Annex 4.
11. The FMO could consider creating a common template for the Communications Strategies in order to facilitate the comparisons between the beneficiary states, and a common Annual Strategic Report template, which would allow better tracking of the progress of implementing the Strategies year-on-year. In particular, such templates would need to be more detailed than e.g. the current template for the Annual Programme Reports, in which the Programme Operators follow the same headings, but there are no concrete suggestions what level of details should be included under the heading "Information and Publicity".

REVIEW OVERVIEW

The Review was commissioned by the Financial Mechanism Office – the secretariat of the EEA and Norway Grants. It was conducted by Coffey International Ltd. from October 2015 to June 2016.

Purpose of the Review

- To assess if the legal requirements on communications are sufficient to ensure effective communications strategies and plans.
- To assess the progress of implementation of communications strategies and plans across the beneficiary countries, including how the requirements of the Regulations are being fulfilled.
- To identify communications results and good practices.
- To assess the extent to which the EEA and Norway Grants provide/can provide additional visibility for the donor states.
- To prepare recommendations for the content of the revised Regulations and/or guidelines on improving communications strategies and implementation.

Methodology

- A review and analysis of reports and evidence including websites, which confirmed communications activities undertaken at national, programme and project level
- A survey of all National Focal Points (NFPs), which resulted in 22 responses from all NFPs.
- A survey of Programme Operators in five countries (Bulgaria, Lithuania, Poland, Portugal and Slovakia), which resulted in 236 responses.
- A survey of Project Promoters in the same five countries, which resulted in 539 responses.
- Interviews with key stakeholders (including Donor Country Embassies and Donor Programme Partners).
- Focus groups with beneficiaries and key opinion formers.