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# Communications Review of the EEA and Norway Grants

2009-2014

Final Report

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**Financial Mechanism Office, European Free Trade Association**

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# Abbreviations and acronyms

<b>BG</b>	Bulgaria
<b>BS(s)</b>	Beneficiary State(s)
<b>CY</b>	Cyprus
<b>CZ</b>	Czech Republic
<b>DPP(s)</b>	Donor Programme Partner(s)
<b>EE</b>	Estonia
<b>EFTA</b>	European Free Trade Association
<b>ES</b>	Spain
<b>EU</b>	European Union
<b>FMC</b>	Financial Mechanism Committee
<b>FMO</b>	Financial Mechanism Office
<b>GR</b>	Greece
<b>HR</b>	Croatia
<b>HU</b>	Hungary
<b>I&amp;P</b>	Information & Promotion
<b>LT</b>	Lithuania
<b>LV</b>	Latvia
<b>MT</b>	Malta
<b>NFP(s)</b>	National Focal Point(s)
<b>PL</b>	Poland
<b>PO(s)</b>	Programme Operator(s)
<b>PP(s)</b>	Project Promoter(s)
<b>PS(s)</b>	Priority Sector(s)
<b>PT</b>	Portugal
<b>RO</b>	Romania
<b>SI</b>	Slovenia
<b>SK</b>	Slovakia

# 1 Executive summary

Coffey International Development (Coffey) was contracted to carry out the Communication Review of the EEA and Norway Grants 2009-2014. The study was carried out over 8 months, from October 2015 to June 2016. The main study goals were to identify good communication practices and develop recommendations for the content of revised Regulations (and guidelines).

There were five specific objectives for the study:

1. To assess if the regulation requirements on communications are sufficient to ensure effective communication strategies and plans
2. To assess the progress of implementation of communication strategies and plans across the beneficiary states, including how the requirements of the regulation are being fulfilled.
3. To identify communications results and good practice
4. To assess the extent to which the EEA and Norway Grants provide/can provide additional visibility for the donor states.
5. To prepare recommendations for the content of a revised Regulation and/or guidelines on improving communication strategies and implementation.

The methodology deployed for this study included a review and analysis of reports and evidence including websites, which confirmed communication activities undertaken at national, programme and project level. This was complemented by the collection of primary quantitative data through:

- 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); and
- focus groups with beneficiaries and key opinion formers.

This evidence was used as the basis for answers to the study questions, which are provided in Chapters 4 - 7. The conclusions and recommendations stemming from the answers to the individual study questions allowed us to formulate the main overarching and cross-cutting conclusions and recommendations, as presented below.

## 1.1 Main Conclusions

### Regulation requirements relating to communication

- Several countries from Central and Eastern Europe, perceive the Regulations and requirements as finite and consciously do not carry out activities not explicitly required in legal requirements. This means that there is scope to enhance the regulations to better meet their communication needs by **including a clear, unambiguous explanation that the requirements are not intended to set limits to activities** and that additional initiatives are encouraged.

- Even though the national websites overwhelmingly fulfilled many of the requirements stipulated in Annex 4, these sites were not consistently presenting information with regards to the impact of the Grants. The **lack of information on the Grants' impact** underlines the fact that information about the Grants is not pulled together to provide an overview of the bigger picture of funding across individual states and highlights the difficulties in providing this type of information. There is a **need for a more integrated approach**.
- All of the beneficiary states have dedicated **websites** in national languages and in English. However, our study highlights **great variability**, particularly at programme and project level (where it was possible to find project websites at all, due to broken links, etc.), which undermines the effort of showing the impact the Grants have in a consistent manner and is a missed opportunity of showcasing the full extent of the support offered by the Grants.
- One of the most common means of **exceeding the Requirements** across the three levels was to make **use of social media**, which suggests adding this communication channel to the revised Requirements might be an option worth exploring. However, this raises questions about the need for a more integrated approach rather than a proliferation of accounts that may be dormant or lack news.
- National Focal Points, Programme Operators and Project Promoters consider that the communication requirements in the Regulations are **clear on roles and responsibilities**. However, the level of clarity about who does what **does not extend to Donor Programme Partners nor the Donor States Embassies**, as they are not mentioned in the current Regulation. This raises questions as to whether expectations towards Donor Programme Partners need to be better defined and whether exclusion of the Embassies from the Regulations does not pose a missed opportunity for highlighting the bilateral aspect of the Grants.

## Implementation

- Although the actors appreciate the relevance of story-telling for reaching wider audiences, which is also confirmed by the key opinion formers, there are some issues of more 'operational' nature, i.e. **the creators of the stories** (Programme Operators and Project Promoters) **struggling with translating the project results into stories** which could be disseminated 'up' and 'out'. The struggles mainly relate to projects of a more 'technical' nature (e.g. environmental monitoring) and issues also arise when the subject of the project is sensitive (e.g. domestic violence, the Roma). Not translating the project results into stories may contribute to the apparent disconnect between project / programme and national level with stories and project information not reaching NFPs, and this reporting up is not supported by the Regulations.
- We have observed that communication efforts do not differ considerably when there are numerous projects versus only a few in a programme, however, there are differences in communication in countries in which the NFP plays the role of Programme Operator for certain programmes. In such cases the information flow from the programme- to national-level is much faster (since it is within the same organisation) and the NFP is in a position to communicate the results much quicker.
- Overall, the **implementation structures for communication are not clearly defined** in the Communication Strategies and the corresponding Strategic Reports for 2013 and 2014. There is also very faint evidence (if any) of defined implementation structures in the Communication Plans on programme level.
- Regarding communicating on **sensitive topics**, two of the case study countries (Bulgaria and Slovakia) offered very positive feedback and appreciation of the activities supporting the **Roma**, yet at the same time pointing out that more often than not, communicating to the wider public about the projects supporting Roma brings significant amount of **negative press**. Another topic which was mentioned as

being particularly difficult to communicate on was **domestic violence**. The fact that sensitive topics are problematic for programme operators and project promoters to communicate suggests that there is scope for the FMO to produce **additional guidelines / how-to guides for programmes which deal with sensitive topics**.

- There is **no consistent approach regarding the available resources and budget for communication** among the beneficiary states. The differences between the amounts of budget allocated to communication activities varies from over 50% to under 1% of the management costs.
- For most of the actors, the persons taking care of communicating activities either work alone or with a support from another person, however very often the case is that they **do not have an allocated communications team/person** just a communication function spread between the different team members. The reported profiles of the people dealing with communication also suggest that these are very seldom communication professionals.

### Effectiveness and impact

- The Regulations **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.
- The descriptions of **target groups** in the Regulations are common to all levels; in each case there is a focus on the public, as well as other stakeholders. Given resource implications, we question the relevance of including the public as a direct target group for **all** levels of activity (project, programme and at national level) and whether it would make sense for a more focussed approach.
- One of the main challenges to perceptions and awareness-levels relates to the **confusion with EU Structural Funds**. Given the relatively small size of the Grants in comparison to EU support, it would be unreasonable to expect great levels of recognition. However, given that the Grants offer support for the NGO sector, which the EU Structural Funding offers only to a very limited extent, including this aspect in messaging on the Grants may be an approach worth exploring further.

### Donor visibility

- It became clear that the use of "EEA" abbreviation is the least understood among the public (and that the abbreviation itself varies in the languages of the beneficiary states), whilst using the **names** of the countries or featuring **flags** brings more recognition. This raises the question whether the name "EEA Grants" should be retained and if there are other possible names that might bring more recognition to the Donor countries other than Norway.
- With regards to the **branding** used, a large majority of NFPs refer in their communication activities to the Grants as "EEA Grants" and "Norway Grants" translated in their own language. In several countries the preferred name is the translation of the "Norwegian Financial Mechanism". All NFPs and all of the examined sample Programme Operators used the Grants' logos in their communication materials, however we have identified several Project Promoters who did not use the logos at all. Conversely, several project promoters highlighted that they are required to place **several equally sized logos** (the Grants', the NFP's, the PO's) on their communication materials, making it confusing, if not impossible, for a layperson to identify the actual source of support.
- The **reasons behind the Donors having created the Grants** remain somewhat obscured. There would be 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.



- When it comes to self-reporting of the goals and priorities for communication, raising awareness of **bilateral cooperation** was mentioned as important, but **not the most important goal for communication** by any of the three categories of actors. At the same time, the Programme Operators considered communicating the results of bilateral cooperation as one of the most difficult tasks in addressing the Regulations' requirements.
- The fact that the **communication role of the Donor States' Embassies is not mentioned in the Regulation** and the accompanying guidelines presents a missed opportunity. The Embassies are already conducting intensive communication actions (sometimes in cooperation with the National Focal Points), which enhance Donor visibility and highlight the bilateral aspect. In particular, participation of respective Ambassadors generates media interests and can help to overcome the confusion of the Grants with EU Structural Funds.

### Processes

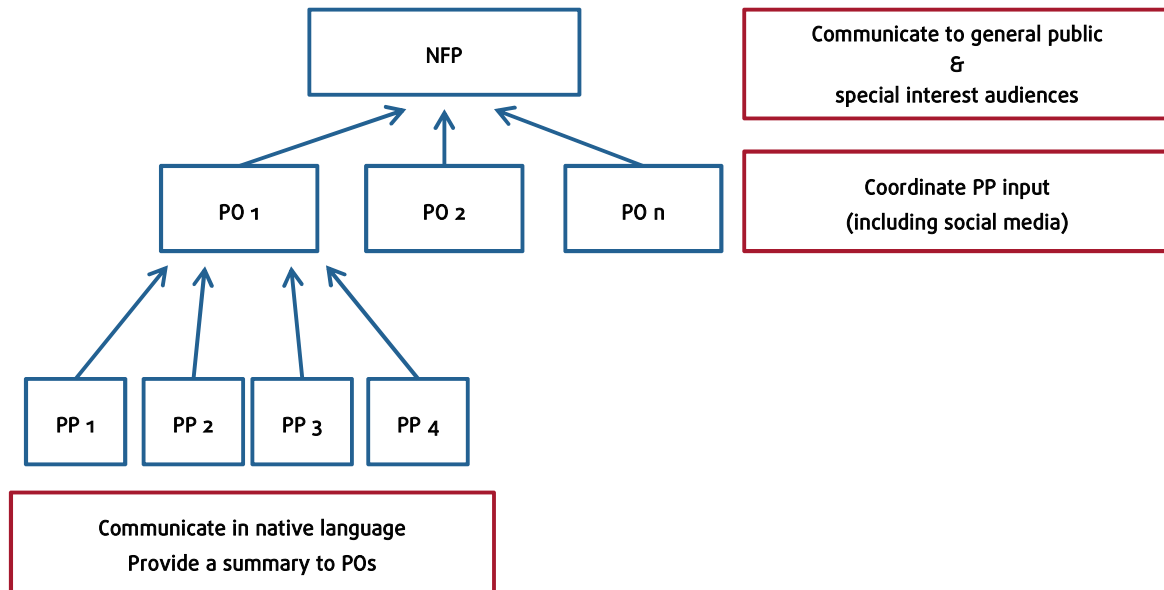
- Whilst the **cooperation between the levels appears mostly successful**, the structure of reporting and follow-up seems to **sometimes obscure the exchange of know-how and may lead to unnecessary doubling of efforts**. Annex 4 puts an emphasis on checking (by the NFP and Programme Operators) that communication obligations are carried out to supervise actors at lower levels of the hierarchical chain, without a requirement for these actors to report back up the line. The Annex does not support a sense of national team all striving to meet common aims, sharing information and stories, so that successful projects can be easily identified and used to support awareness-raising.
- 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 Member States.
- It seems that **setting SMART goals<sup>1</sup> and Key Performance Indicators (KPIs) are areas that NFPs find quite challenging**. There are likely to be valid reasons for this as it can be difficult to set goals for measurable outputs and outcomes if there are insufficient mechanisms in place to collect this data. Also, it can be difficult to make choices on what and how to measure.

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<sup>1</sup> Goals that are: **Specific** (target a specific area), **Measurable** (quantifiable or at least with a suggestion of an indicator of progress), **Assignable** (one can specify who will do it), **Realistic** (results can realistically be achieved, given available resources) and **Time-related** (have a target date).

## 1.2 Main Recommendations

- Consider the following 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:



- 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 than 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.
- To **strengthen Donor visibility** we recommend for the Donors to 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).
- To **avoid fragmentation and dispersion of the perceived identity of Donors** we recommend limiting the plethora of logos and names with which the sponsored projects are currently branded (such as the names and logos of the Grants followed by the name and logo of the NFP, the name and logo of the Programme Operator, the name of the programme, the name and logo of the Project Promoter etc.) and **ensure prominence of the Grants’ names and logos**. In the revised Regulations and/or its Annexes, the FMO should be explicit that all actors are encouraged to conduct additional communication activities on top of those listed in the Regulations / Annexes. 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.
- We recommend that consideration 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, with several advantages including making it much easier to show the volume of support that is provided through the Grants, as well as being a “one stop shop” for any information on the Grants in a given country. Such means of presentations are much clearer and user

friendly, as well as ensure the establishment of a consistent visual identity. 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.

- 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.
- The FMO could consider **defining a separate budget line reserved for communication activities**, for all three implementation levels (national, programme and project). Earmarking a dedicated budget for communication could be beneficial, especially given that not every institution recognises the importance of hiring a communication professional.
- Support the development of more consistent **national monitoring and evaluation frameworks** for communication activities across beneficiary states. 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.
- 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.
- 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.
- The FMO could consider **creating a common template for the Communication 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 template 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".

## 2 Subject of the study

### 2.1 Introduction

This document is the Final Report of the Communications Review of the EEA and Norway Grants 2007-2103. The report is submitted by Coffey to the Financial Mechanism Office (the FMO) of the European Free Trade Association (EFTA). The main aim of the study is the assessment of the effectiveness and efficiency of communication on the Grants at country<sup>2</sup>, programme and project level.

The report consists of the following sections:

- Section 1: Executive Summary provides summary conclusions to the questions required by the Terms of Reference to the study. It also provides summary recommendations for improving communication requirements in the future.
- Section 2 presents the context of the Grants and provides a brief introduction to the subject of the study: the communication requirements described in Annex 4 to the Regulations on the implementation of the EEA and Norway Grants 2009-14.
- Section 3 summarises the purpose and approach to this review, and provides an overview of the main methods used to collect and analyse data;
- Sections 4-7 present overall findings regarding the communications on the Grants and the evidence on which these are based, ordered by evaluation theme and by question.

The report is accompanied by a separate document containing the Technical Annex which includes the detailed findings from the data collection tools.

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<sup>2</sup> The EEA and Norway Grants are available to 16 EU countries in Central and Southern Europe and the Baltics.

## 2.2 The Grants

The **EEA Grants and Norway Grants** are the financial contributions of **Norway, Iceland and Liechtenstein (donor countries)** aimed at reducing the social and economic disparities in the EEA and strengthening bilateral relations with **16 EU countries (beneficiary states)**:

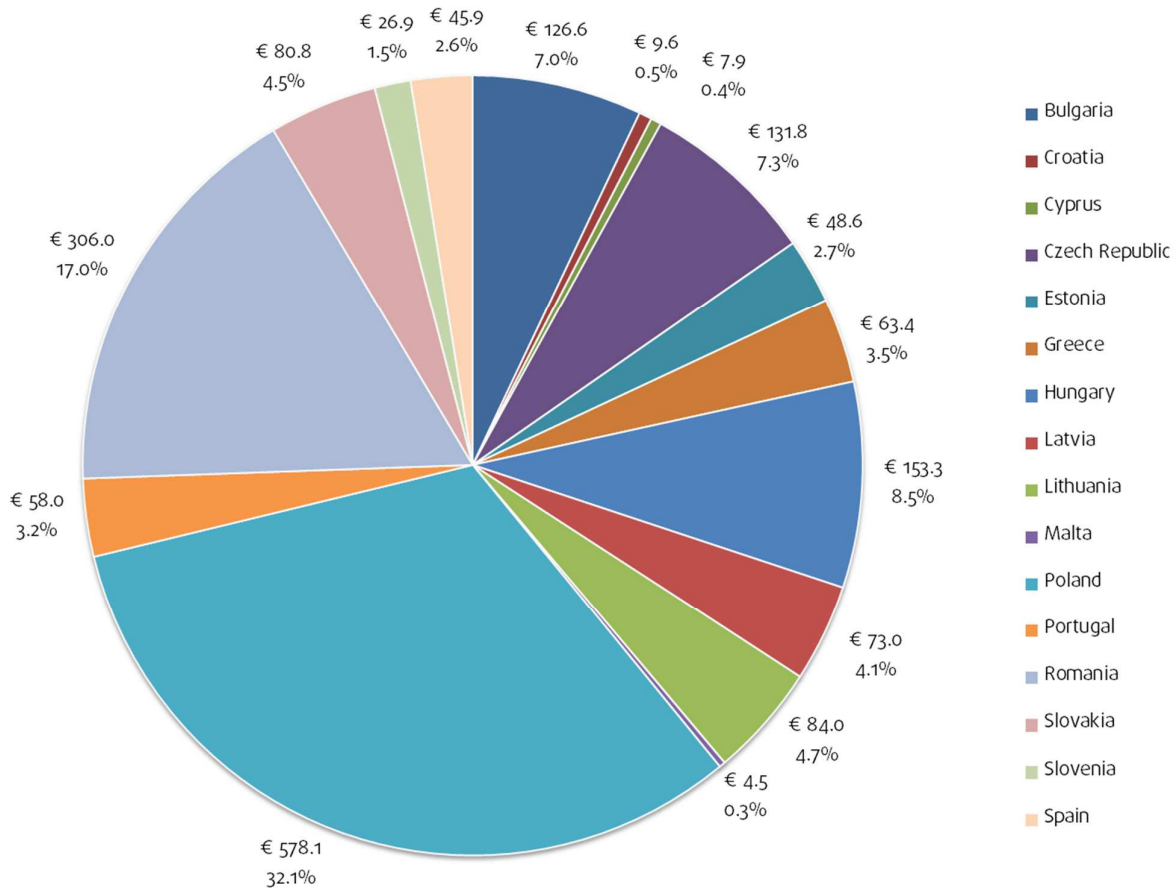
- |              |             |             |                   |
|--------------|-------------|-------------|-------------------|
| □ Bulgaria,  | □ Croatia,  | □ Cyprus,   | □ Czech Republic, |
| □ Estonia,   | □ Greece,   | □ Hungary,  | □ Latvia,         |
| □ Lithuania, | □ Malta,    | □ Poland,   | □ Portugal,       |
| □ Romania,   | □ Slovakia, | □ Slovenia, | □ Spain.          |

In the grant period 2009-2014, the combined total of EEA & Norway Grants support reached almost € 1.8 billion. Of this value, the EEA Grant represented € 993.5 million (55%), with Norway contributing 95.8% (€ 974 million), Iceland 3% (€ 29.6 million) and Liechtenstein 1.2% (€ 11.8 million).

The Norway Grant (financed by Norway alone) amounted to € 804.6 million (45%). The available funding may be implemented until 2016/2017.

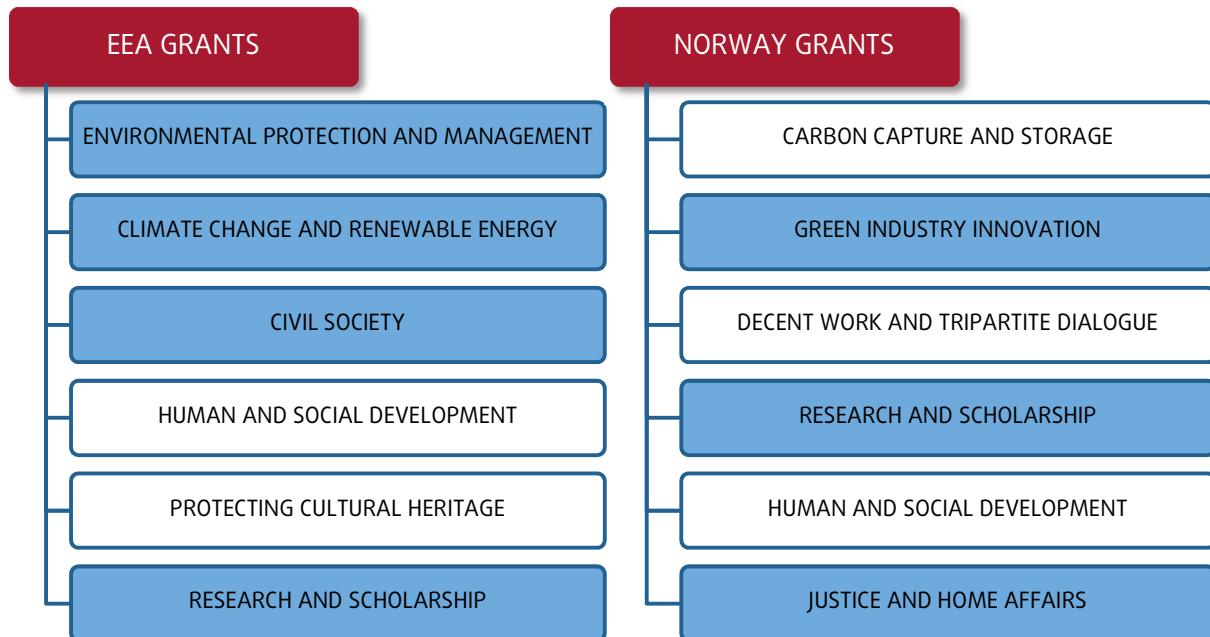
The figure below presents the distribution of the funding (both of the EEA and Norway Grants) among the beneficiary states, allocated based on population size and GDP per capita.

**Figure 1: Distribution of funding among the beneficiary states in the period 2009-2014**



## 2.3 Priority sectors and programme areas

In the 2009-2014 period, the support to beneficiary countries was structured around **10 Sectors** and **32 Programme Areas (PAs)**, with a total of **150 programmes** and **circa 6,500** projects funded in the 16 beneficiary states. In the figure below, the sectors prioritised in this review are marked with shaded background.



## 2.4 Management of the Grants

The decision-making authority of the EEA Grants is the **Financial Mechanism Committee (FMC)**, comprised of representatives of the Ministries of Foreign Affairs of Iceland, Liechtenstein and Norway. The decision-making authority of the Norway Grants is the **Norwegian Ministry of Foreign Affairs**.

The **Financial Mechanism Office (FMO)** is the Brussels-based secretariat for both the EEA and Norway Grants. The FMO is affiliated to EFTA, but reports to the Foreign Ministries of Iceland, Liechtenstein and Norway. It is responsible for the day-to-day running of the two grant schemes and serves as a contact point for the beneficiary countries, maintaining a close dialogue with the individual **National Focal Points (NFPs)**, most often ministries, which are responsible for implementing the Grants at national level.

Within each country, individual programmes are developed and managed by **Programme Operators (PO)**. Programme Operators are responsible for awarding the funding to projects according to agreed criteria and for monitoring their implementation. Moreover, each project has a **Project Promoter (PP)**, which is the organisation that submitted the project proposal and is responsible for implementing the project in question.

Bilateral partnerships between public and private institutions, non-governmental organisations and research institutions in the donor and beneficiary countries are widely encouraged. These happen at both programme and project level. In more than half of the programmes, public bodies from Iceland, Liechtenstein and Norway are involved as strategic advisers to Programme Operators and act as **Donor Programme Partners (DPPs)**. These bodies take part in the programme planning and implementation, and they also help facilitate partnerships at project level.

## 2.5 Information & Publicity requirements

There are formal Regulations that guide the implementation of the EEA and Norway Grants 2009-14. **Annex 4** to the Regulations defines Information and Publicity (I&P) Requirements for beneficiary countries. The Regulations also assign specific roles and responsibilities to National Focal Points (NFPs), Programme Operators, and Project Promoters in relation to communication, as well as specific guidelines on how communication provisions should be enforced at programme and project level.

According to Annex 4, all I&P from the NFPs, Programme Operators and Project Promoters are required to support the overall objectives of the Grants:

- contribute to the reduction of economic and social disparities in the European Economic Area; and
- strengthen bilateral relations between the Donor State(s) and the Beneficiary States.

They are also obliged to highlight the role of the Grants and to ensure that the support obtained through the Grants is transparent.

### National Focal Points

Article 4.3.4 of the EEA Grants Regulation introduces two overall aims which the NFPs need to fulfil through I&P activities, namely highlighting the role of the Grants, and ensuring the visibility of the support that they provide. Annex 4 specifies that NFPs are ultimately responsible for providing information to potential beneficiaries and relevant stakeholders of the Grants (including citizens of the beneficiary state), communicating to the Programme Operators and ensuring that they fulfil their information and publicity obligations. Drawing from this, the NFPs are required to develop a **Communication Strategy** that describes the communication aims, measures and target groups for the grant period, as well as how these measures will be monitored and evaluated.

### Programme Operators

Like the NFPs, the Programme Operators need to highlight the role of the Grants and to ensure that the support obtained through the Grants is transparent (Article 4.7.2 of the EEA Regulation). According to Annex 4, the POs are required to provide information on the programme they operate, and the Grants as a whole to citizens of their state, potential beneficiaries and relevant stakeholders. They are required to prepare a **Communication Plan** for each of the programmes implemented in the country. The plan should describe the communication aims, measures and target groups, as well as identify the potential and actual beneficiaries of the Grants, and potential and actual Donor Project Partners. Programme Operators should also oversee that Project Promoters (PPs) fulfil their information and publicity obligations.

### Project Promoters

The I&P requirements for the PPs are not mentioned in the Regulation, however Annex 4 specifies that they should also aim to highlight the role of the Grants and ensure the transparency of the support provided by the Grants. Furthermore, Annex 4 details the responsibilities of the PPs, which include the obligation to provide information on their projects to the widest possible audience at national / regional / local level (depending on the project) and developing a **Publicity Plan**, which outlines the communication aims, measures and target groups (including the general public). Finally, the PPs are required to undertake measures for making information on their project available on the internet, either through a dedicated website or through dedicated web pages on an existing website.

The table overleaf details the obligations for each category of actors.

Table 1: I&P obligations of National Focal Points, Programme Operators and Project Promoters

	Objectives	Target groups	Channels and tools:	Reporting	Other responsibilities:
NFPs	<ul style="list-style-type: none"> <li>■ to communicate on the <b>Grants'</b></li> <li>□ existence</li> <li>□ objectives</li> <li>□ implementation (incl. cooperation with DPPs)</li> <li>□ overall impact</li> <li>□ transparency</li> </ul>	<ul style="list-style-type: none"> <li>■ citizens of the Beneficiary State,</li> <li>■ potential beneficiaries</li> <li>■ Relevant stakeholders</li> </ul>	<ul style="list-style-type: none"> <li>■ 3 major events (including launch and closing events)</li> <li>■ a dedicated website on the Grants in the beneficiary state (including information in the native language and English)</li> </ul>	<ul style="list-style-type: none"> <li>■ Communication Strategy (incl. objectives, target groups, activities, added value, contact details and evaluation)</li> <li>■ Annual Strategic Reports</li> </ul>	<ul style="list-style-type: none"> <li>■ ensure POs fulfil their I&amp;P obligations</li> <li>■ ensure visibility of the Grant's support in all events</li> </ul>
POs	<ul style="list-style-type: none"> <li>■ to communicate on the <b>Programme's</b></li> <li>□ existence,</li> <li>□ objectives,</li> <li>□ implementation, (incl. cooperation with DPPs)</li> </ul>	<ul style="list-style-type: none"> <li>■ citizens of their state,</li> <li>■ potential beneficiaries</li> <li>■ relevant stakeholders</li> </ul>	<ul style="list-style-type: none"> <li>■ at least 2 two major information activities</li> <li>■ a dedicated website on the Programme (including information in the native language and English)</li> </ul>	<ul style="list-style-type: none"> <li>■ Communication Plan (incl. objectives, target groups, activities, added value, contact details and evaluation).</li> <li>■ Annual Programme Report</li> </ul>	<ul style="list-style-type: none"> <li>■ involve relevant multipliers</li> <li>■ inform the FMC of any open calls 2 weeks before launch</li> <li>■ ensure visibility of the Grant's support in all events</li> <li>■ ensure PPs fulfil their I&amp;P obligations</li> </ul>
PPs	<ul style="list-style-type: none"> <li>■ highlight the role of the financial mechanism and the Donor State(s)</li> <li>■ provide information on their <b>projects</b></li> </ul>	<ul style="list-style-type: none"> <li>■ the widest possible audience of stakeholders at national / regional / local level and citizens</li> <li>■ project participants</li> </ul>	<ul style="list-style-type: none"> <li>■ 3 information activities on progress / results (for Grants exceeding € 500,000; 2 activities for smaller projects)</li> <li>■ Make project available on the internet including in English for projects over €150K</li> <li>■ Billboard and commemorative plaque</li> </ul>	<ul style="list-style-type: none"> <li>■ the Publicity Plan (incl. objectives, target groups, activities, added value, contact details and evaluation)</li> </ul>	<ul style="list-style-type: none"> <li>■ ensure that those taking part in the project have been informed of the funding from the relevant Programme and the financial mechanism</li> </ul>



## 3 Study approach and methodology

### 3.1 Objectives of the study

The overall study objectives are to **identify good communication practices and develop recommendations for the content of revised Regulations**. Additionally, there are five specific objectives for the study:

- I. To assess whether the scope of the regulation requirements on communications is sufficient to ensure that effective communications strategies and plans are developed and implemented
- II. To assess the progress of implementation of communication strategies and plans across the beneficiary states, including how the requirements of the regulation are being fulfilled.
- III. To identify communications results and good practice
- IV. To assess the extent to which the EEA and Norway Grants provide/can provide additional visibility for the donor states.
- V. To prepare recommendations for the content of a revised Regulation and/or guidelines on improving communication strategies and implementation.

### 3.2 Key questions

The objectives translate into 12 specific questions, as listed below:

Table 2: Key questions

	Questions
Regulation requirements related to communication	Q 1: Are the relevant provisions on Communications in the Regulation, its annexes and guidelines sufficient to ensure that effective communication strategies are developed and implemented?
	Q 2: How are the communication requirements of the Regulation, its annexes and guidelines followed up in different beneficiary states and at different levels? Which beneficiary states exceed the basic requirements in the Regulations?
	Q 3: To what extent are the two overall objectives of the Grants reflected in the implementation of the communication strategies and plans?
	Q 4: Are there dedicated websites for the EEA and Norway Grants in each beneficiary state, in English and in the language of the beneficiary state?
Implementation	Q 5: What are the main channels of implementation for effective communication strategies?
	Q 6: Which beneficiary states have an adequate and effective implementation structure for their communication strategies and plans in place?
	Q 7: What is the budget and the resources for implementing the communication strategies and plans?
Effectiveness and impact	Q 8: How are results defined and communicated?
	Q 9: What is the image and perception of the Grants?
	Q 10: What is the awareness of the Donors among key opinion formers? How is Donor states' visibility and reach being measured across beneficiary states?

**Q11:** How has the cooperation on communication worked between different actors (Donor states' embassies, National Focal Points, Programme Operators, Project Promoters and Donor Programme Partners)?

**Q12:** Which beneficiary states have mechanisms in place to monitor and evaluate the effects of their communication work, and how do they do this?

### 3.3 Methodology

The study consisted of four main phases:

- Preparatory phase,
- Data collection on European-level (Task 1)
- In-depth case-studies (Task 2)
- Triangulation, analysis, conclusions and recommendations

This study design allowed us an overall of the full scope of the two Grants and combined this with a more in-depth view of a smaller subset of activity. Following an initial review of existing data and documentation provided by the FMO, we designed a set of data collection tools (survey questions, discussion guides, data collection templates) to allow us to focus our study. We then focused data collection activities, as follows:

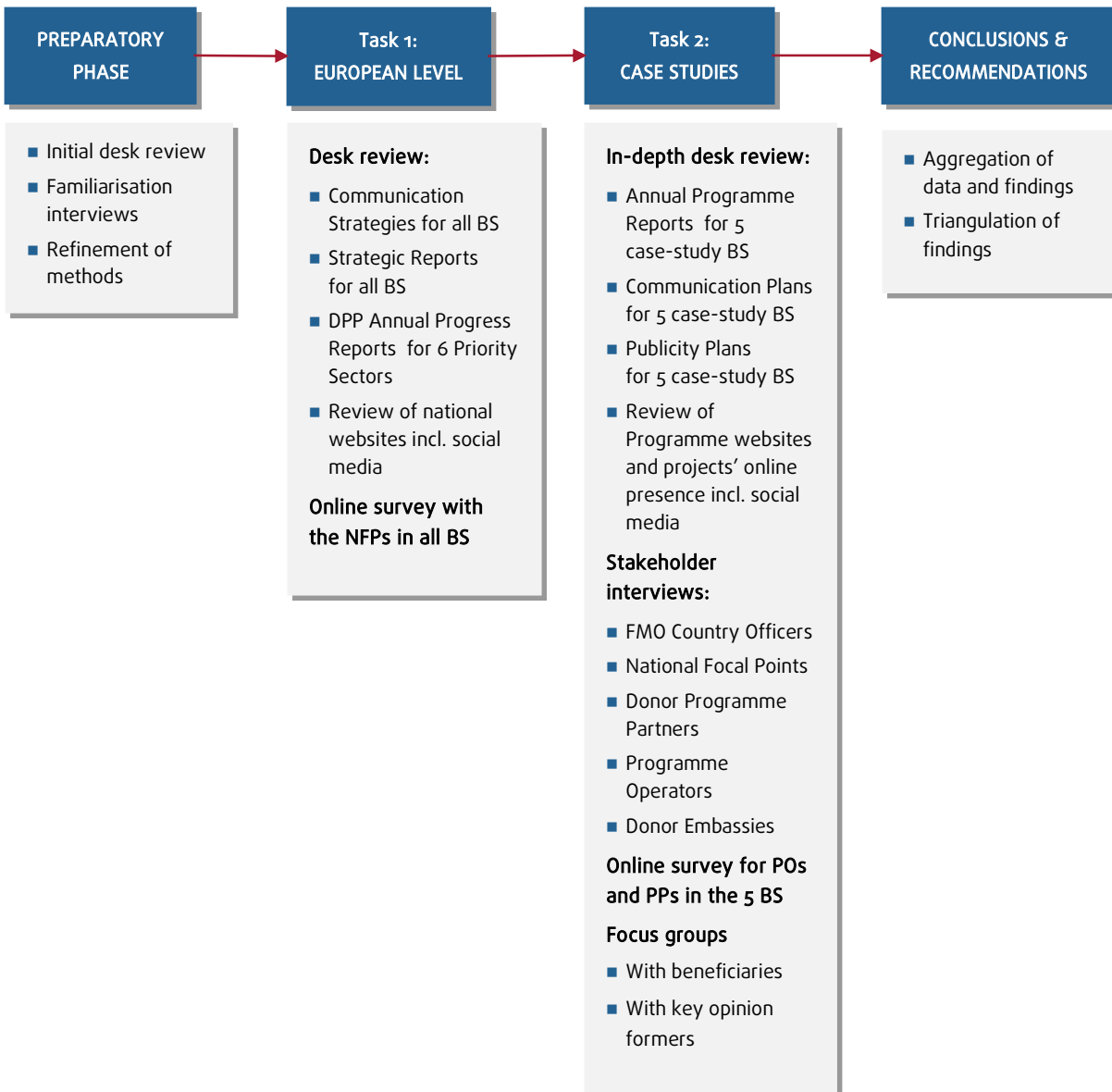
- **Pan-European view:** we gathered and reviewed data via a desk review of the Communication Strategies and Strategic Reports developed and implemented by NFPs across the 16 beneficiary states during the 2009-2014 grant period. We also conducted a detailed review of the national websites for the EEA Grants and Norway Grants. This was complemented with an online questionnaire targeting all NFPs across the beneficiary states. We received responses from all 15 NFPs contacted<sup>3</sup>, hence the data provided through the NFP survey can be considered to provide a more or less complete picture at national level.
- **Country-level view:** we developed **case studies** focused on five beneficiary states to provide us with a more in-depth view of the grant systems. We drew evidence from desk research, extensive stakeholder interview programme (47 interviewees, including: FMO Country Officers, NFPs, Programme Operators, Donor Programme Partners, and Donor Embassies), online surveys of Programme Operators and Project Promoters, and focus groups with opinion formers and project beneficiaries in each of the countries. In total, we received 775 responses to the two surveys (236 responses to the PO survey and 539 responses to the PP survey).

What needs to be emphasised is that the surveys of Programme Operators and Project Promoters provide views from a sample of 5 countries and that whilst the level of response in these countries means that we have a high degree of confidence of relevance to the wider group in these countries, we should be cautious about extrapolating beyond this group.

The figure overleaf provides a concise summary of the content of each of the study phases.

<sup>3</sup> Due to the Funds in Hungary being suspended at the time of conducting this element of the research, the Hungarian NFP has not been contacted.

Figure 2: Content of the study phases



### 3.4 Case-study countries

For budgeting and time reasons, it was not possible to examine communication of the Grants in the same level of detail in all beneficiary countries. Thus, the Terms of Reference (TOR) asked the study team to propose a set of case studies aimed at examining communication material produced and communications activities carried out at programme and project level. The sampling strategy took into account the requirements of the TOR, as well as particular requests from the Steering Committee and the Norwegian Ministry of Foreign Affairs. In summary, the criteria used to decide the sample of countries were:

- **Size of funding received:** it is possible to group beneficiary countries into three clusters: large beneficiaries (with funding exceeding 300 million EUR); medium beneficiaries (with funding between 150 and 30 million EUR); and small beneficiaries (with funding below 10 million EUR).
- **Priority sectors covered:** we have examined the sectors addressed in each country in order to ensure that all priority sectors are covered in the proposed sample.
- Existence of Roma-specific programmes
- **Time as beneficiary country:** “early beneficiaries” (countries which have benefited from the Grants since the first Financial Mechanism), “recent beneficiaries” (countries which are beneficiaries since the 2004 enlargement of the EU and EFTA), and “newest beneficiaries” (countries which joined in 2007 and 2013).

Taking the above criteria into account it was agreed that the five case-study countries for the review would be:

- Bulgaria
- Lithuania
- Poland
- Portugal
- Slovakia

### 3.5 Analysis and Reporting

The final phase of this study has involved the triangulation and integration of the primary and secondary evidence, which was gathered as per the above methodology. Through an internal team workshop process, we developed a set of key findings which correspond to the study questions set in the Terms of Reference. This report was then discussed at a meeting with the FMO in June 2016.

The following chapters (4 -7) describe our key findings from this study, which are presented as answers to the study questions set in the Terms of Reference, which are grouped as follows:

Chapter 4: Regulation requirements related to communication

- Regulations’ provisions on communication
- Adhering to the Regulations’ requirements
- Reflecting the Grants’ overall objectives
- Web presence

#### Chapter 5: Implementation

- Main channels for implementation
- Capacity and resources for implementation

#### Chapter 6: Effectiveness and impact

- Communicating results
- Perception and awareness of the results and Donors

#### Chapter 7: Processes

- Cooperation between different levels
- Monitoring and evaluation of communication work

## 4 Regulation requirements related to communication

This section presents the key findings from the study regarding the first four questions, which concern the way the requirements of the Regulations were implemented in different beneficiary states and at different levels (national, programme and project).

### 4.1 Regulations' provisions on communications

#### Question 1:

**Are the relevant provisions on communication in the Regulations, their annexes and guidelines sufficient to ensure that effective communication strategies are developed and implemented?**

To answer this question we investigated whether the roles and responsibilities of all parties involved (i.e. Donor Programme Partners, National Focal Points, Programme Operators and Project Promoters) are clearly defined in the Regulation, and if the parties involved understand their different roles and responsibilities. We also explored perceptions of the sufficiency and appropriateness of the provisions of the Regulations to ensure effective communication through national Communication Strategies, programme-level Communication Plans, and Publicity Plans for projects.

#### Sources of evidence

- Desk research
- Online questionnaire of NFPs
- Country case studies:
  - desk research,
  - stakeholder interviews
  - PO and PP survey

#### Roles and responsibilities of the involved parties

Based on our analysis of the Regulations, in particular Annex 4, there is scope for a clearer definition of what is required with a view to supporting enhanced communication impact by the three categories of actors. In particular, the review allowed us to find that:

- The objectives of information and promotion actions for all three categories of actors are almost identical, suggesting that they should strive to achieve the same things just with varying amounts of resources;
- There are inconsistencies in defining the target groups for the three levels of actors: there is no distinction made between primary and secondary target groups, as well as between the **information** (for the other levels of management and 'internal' stakeholders such as Programme Operators or Donor Programme Partners) and **communication** (i.e. awareness-raising activities and promotion of the Grants among 'external audiences' such as the general public or potential beneficiaries). It is only the Project Promoters who are expected to communicate about the projects and there is no explicit mention of using the expected story-telling approach.

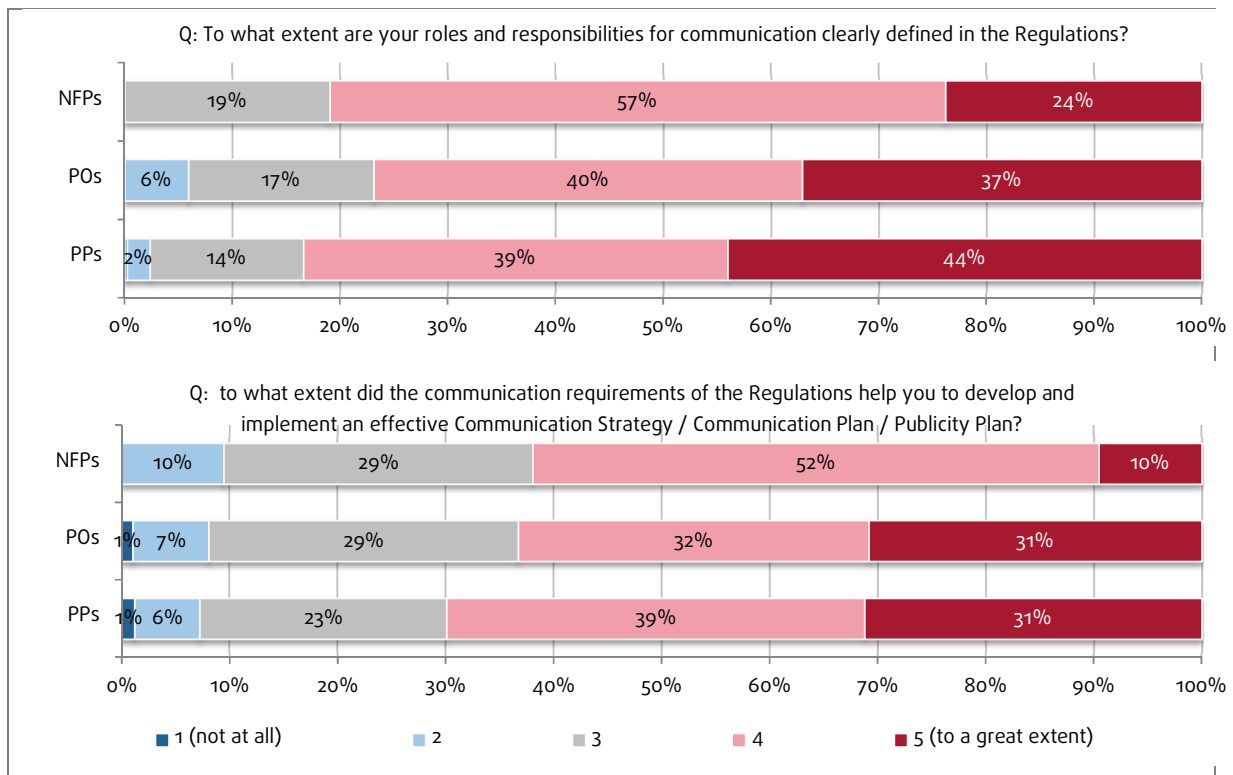
The results of the **National Focal Points' (NFP)** questionnaire clearly indicate that **for most NFPs the description of their roles and responsibilities is sufficiently clear**. NFPs were somewhat less positive about the contribution of the communication requirements set by the Regulation to support the development and implementation of an effective national communication strategy. Close to a third of respondents rated this

contribution as average, although more than half thought that the communication requirements had helped them in the elaboration of their communication strategy to a certain extent. From in-depth interviews with the NFP representatives, it is clear that in some countries the requirements are seen as “finite” requirements, i.e. the NFP would not carry out any additional communication activities other than prescribed in the Regulations for fear of non-compliance.

The majority of surveyed **Programme Operators** thought that their roles and responsibilities relating to communication were defined by the Regulations “to a great extent”. This view was especially strong in Bulgaria, but overall at least 70% of respondents per country reported that the Regulations were clear or very clear. When asked about the contribution of the Regulations to the development of their Communication Plans, over a half of the POs participating in the survey (63%) stated that the Regulations had been helpful.

From the perspective of **Project Promoters**, the Regulations were **overwhelmingly perceived as explicit** regarding the roles and responsibilities for communication across all case study countries. A majority (83%) of respondents thought that the Regulations were clear on these topics to a certain or a great extent. The Regulations were also seen as very helpful, although to a less extent (70%), in the development and implementation of an effective Publicity Plan.

**Figure 3: Clarity of role descriptions and Regulations’ contribution to effective strategies and plans**



From interviews with **Donor Programme Partners**, we identified that some interviewees were unsure about the specifics of communications requirements for DPPs. Several interviewees explained that DPPs do not have any official “communications strategy”, but most were aware of the stipulations in the terms of reference they signed with Beneficiary States (to communicate “to the best of their availabilities”). The DPPs were aware that their communication activities should be directed at, and undertaken in, the Donor States (DS), whereas communicating in the beneficiary states was outside of their remit. In terms of communicating in the donor states, **DPPs do not follow any official communication strategy** and their activities have **evolved** as projects move from initiation to implementation.

With regards to the accompanying guidelines, and in particular the **Communication and Design Manual**, more than half of NFP survey respondents thought that the content of the Manual had helped them to develop their communication strategy to an 'extent' or a 'great extent', but close to a third rated its contribution to effective communication as 'average'. The majority of surveyed Programme Operators and Project Promoters found that the Manual was 'useful' or 'extremely useful', however at the same time more than 50% of both types of actors originating from countries who did not translate the Manual into native languages, found the fact that it was produced in English as challenging. During the focus groups with Project Promoters the ambiguity of certain elements of the Manual were highlighted as very problematic (e.g. regarding the sticker size: "*Size: 100 x 55 mm (although size can vary)*").

## Conclusion

National Focal Points, Programme Operators and Project Promoters consider that the communication requirements in the Regulations are clear on roles and responsibilities. However, the level of clarity about who does what does not extend to Donor Programme Partners, who are not mentioned in the Regulations and are not required to follow any official communication strategy. This raises a question as to whether expectations need to be better defined.

When responses from the three groups (NFPs, Programme Operators and Project Promoters) are compared, Project Promoters are the most positive about the extent that the regulations support them in the design and implementation of their communication activities. Whilst Programme Operators and National Focal Points are mainly positive, views from these groups are more mixed. The survey results suggest scope to enhance the regulations to better meet their needs. This should include a clear, unambiguous explanation that the requirements are not intended to set limits to activities and that additional initiatives are encouraged.

The Communication and Design Manual is, overall, considered as useful guidance for effective communication. However, there is still room for improvement because the Manual is not available in all native languages, and some of the guidelines are perceived to be ambiguous by Programme Operators and Project Promoters.

The Regulations (Annex 4) require many different communicators to be communicating at many different levels (national, programme and project). There is scope to review the current approach with a better definition of communication and information goals and targets, and which actors (NFPs, Programme Operators and Project Partners) are best placed to meet these goals at which levels.

The descriptions of target groups in the Regulations are common to all levels; in each case there is a focus on the public as well as other stakeholders. However, significant resources are required to reach this group and the channels and tools described cannot be considered as sufficient to make any substantial impact on raising public awareness. Given resource implications, we question the relevance of including the public as a direct target group for all levels of activity (project, programme and at national level)

There is no reference to the media or social media in Annex 4, although approaches are described in the Communication and Design Manual. In a context where some beneficiary states are reluctant to conduct activities unless they are explicitly stated in the Regulations, there is scope to consider adding the media as a target group or multiplier, given that some multipliers are already referenced in Programme Operators' requirements. However, given the number of different 'communicators' in each country, the extent that it would be effective for all communicators to focus their efforts on the media and use of social media is questionable. This could lead to a fragmented approach with, for example a duplication of dormant social media pages.



Annex 4 is not currently used to support the collection of data monitoring the reach of the communication efforts, for example requiring a dissemination plan for the materials produced and collection of website data i.e. the number of hits and downloads.

## Recommendations

- In the revised Regulations and/or its Annexes, the FMO should be explicit that all actors are encouraged to conduct additional communication activities on top of those listed in the Regulations / Annexes. This would make it clear to the National Focal Points that they are not in breach of the Regulations if they exceed the 'minimum' requirements set in the Regulations.
- Consider including the Donor Programme Partners and the expectations as to their communication action in the revised Regulations.
- Request the National Focal Points to translate the Communication and Design Manual into native languages to help Programme Operators, and in particular, Project Promoters.
- Be clear and unambiguous whether the guidelines contained in the Communication and Design Manual are mandatory or if they represent general recommendations
- Revise the Communication and Design Manual, so that it is either specific about the expected colours/dimensions of the communication materials, or allows users of the Manual the freedom of choice, but e.g. maintaining the proportions ratio (i.e. stating the ratio of the plaque to be 1:2 which means it would maintain proportionate dimensions regardless of the size: 15mm x 30 mm, 5 m x 10 m etc.)

## 4.2 Adhering to the Regulations' requirements

### Question 2:

**How are the communication requirements of the Regulation, its annexes and guidelines followed up in different beneficiary states and at different levels? Which beneficiary states exceed the basic requirements in the Regulations?**

In answering this question, we looked at how beneficiary states address the communication requirements and the main challenges they encounter. We investigated the extent to which Communication Strategies, Communication Plans and Publicity Plans adhere to the communication requirements of the Regulations. We compared the ways in which the different approaches are similar and dissimilar. Finally, we explored the countries, which have exceeded the basic requirements of the Regulation and identified evidence of best practice.

### Sources of evidence

- Desk research
- Online questionnaire of NFPS
- Country case studies:
  - desk research,
  - stakeholder interviews
  - PO and PP survey

### Communication Strategies, Communication Plans and Publicity Plans

The review of the **Communication Strategies** in the 16 beneficiary countries reveals a **check-list approach** to the reporting of objectives and planned information and publicity activities. In some cases, strategies provide an almost verbatim citation of the requirements contained in the Annex 4 to the Regulations. At national level, Communication Strategies are required to detail plans for at least three major information

activities and their impact. This requirement is **not consistently met across beneficiary states**. Some strategies do not include any information on these events (e.g. Slovenia or Poland), others provide only partial information (e.g. Cyprus with only a reference to a launching and a closing event). The way this requirement is addressed does not add value to the Communication Strategy because the events are described (i) in too general terms to be considered as 'planned', and (ii) do not underline enough the focus on the impact and added value of the information and publicity activities foreseen.

At programme level, most of the sample of **Communication Plans** met the majority of the requirements (definition of aims, targets, activities and tools, as well as time frame, reference to a website). However, what was missing almost universally across the reviewed Plans was any reference to the added-value and impact of the Grants at national, regional and local levels, as well as within the supported sector(s). Plans were also inconsistent with offering contact details to the responsible individuals, and the planning for any evaluation and monitoring remained mostly limited.

At project level, the majority of **Publicity Plans** that we reviewed provided a very general description of objectives and target groups and in some cases these were copy-pasted directly from the text of the Annex. This could suggest that Project Promoters are only paying lip-service to this requirement and not using the plan to help them to think about who to actually target. In addition, we identified that very few Publicity Plans provide information on the division of responsibilities for the implementation of the information and publicity measures or any personal contact information. In addition, monitoring frameworks were not always included. When these were present they defined indicators and set specific targets, however the indicators and targets seem to focus on quantitative aspects only, which do not necessarily correspond to objectives leading to less tangible outputs. But the absence or insufficient logical link between the indicators and targets on one side and the objectives on the other side constitutes a weakness identified in the majority of the documents.

### Challenges in addressing the requirements

The respondents to the three surveys were asked about the main challenges encountered in addressing the communication requirements. The key challenges singled out by **National Focal Points** relate to **ensuring synergies with the Programme Operators' websites** and carrying out **events**. During the subsequent interviews with a selection of NFPs, the interviewees believed the main problem seems to be of a more high-level nature, namely the fact that communication about the Grants is considered secondary to their implementation.

It appeared that the surveyed **Programme Operators** in the five case study countries did not find the communication requirements particularly challenging. Defining target groups and creating a website in their mother tongue are considered as the least challenging tasks. In contrast, creating a **website in English**, preparing a **Communication Plan** and **communicating the results of bilateral cooperation** are considered to be the most difficult tasks. There is anecdotal evidence that the Programme Operators found it hard to interest journalists in writing about their projects in a way that would emphasize the bilateral aspect and highlight the role of the Donors.

According to the survey results, the **Project Promoters** did not, in general, struggle to address the communications requirements although preparing a **Publicity Plan** and **creating a website in English** are the main difficulties.

### Exceeding basic requirements

According to the results of the three surveys, 46% of the NFPs, 25% of Programme Operators, and 28% of Project Promoters believe that they have exceeded the basic requirements for communication about the Grants, as stipulated in the Regulations. Interestingly, sizeable proportions of each group are unsure whether

or not they have exceeded the basic requirements (18% of NFPs, 41% of Programme Operators and as much as 47% of Project Promoters).

Among the **National Focal Points** stating they had exceeded communication requirements, the two most frequent activities were **sharing best practice in meetings with Programme Officers**, and **asking Programme Operators to collect information on Project Promoters, who share best practices**.

In addition, 50% of respondents specified that they had organised **more large-scale events** than the minimum prescribed by the Regulations. 40% confirmed that they had a **social media presence** (which is not expressly included in the basic requirements). Facebook was the only social media channel cited by respondents. One in three NFPs reported that they had created **working groups** to facilitate the sharing of best practice, conducted **regular press events** with journalists, and provided a **physical contact point** on the EEA/ Norway Grants open to the public. In addition, we identified the following **best practice examples** from the five case-study countries:

#### Bulgaria:

- Joint online newsletter developed by the NFP together with the Norwegian Embassy in Sofia, available on both organisations' websites
- "Matchmaking" event with potential Donor partners organised with the help of the Norwegian Embassy. The event lasted 3 days and the bilateral fund was used to cover the costs of Donor Partners coming to Sofia. The "matchmaking" resulted in 11 approved partnerships, 3 of which were with Icelandic and 8 with Norwegian partners.

#### Lithuania:

- Creating a communications working group, which allowed sharing ideas and seeing how successful different Programme Operators have been in communication, as well as helping those who struggle. The working group encourages Programme Operators to join forces and organise joint events.

#### Poland:

- Publishing a quarterly 'lifestyle' magazine ("Human") which seamlessly intertwines stories about the Grants. It is distributed in over 4,000 points across Poland, such as bars, hotels, and waiting rooms, with a circulation of 70,000 issues per quarter.

In the survey, less than half of **Programme Operators** stated they had exceeded the basic requirements. Those who exceeded the requirements, indicated that they **share best practice** with other Programme Operators and Project Promoters, feature stories and updating them regularly on their **website** and **conduct more events** than required by the Regulations. Only four participants (out of 44 respondents who answered this question in the survey) reported making available content on their website in another language. They rarely arrange working groups to share best practice on communication.

The **Project Promoters** who stated that they exceeded the requirements for communication of the Regulations mainly did so through achieving, what they considered to be, a **lively social media presence**, **sharing best practice** with Programme Operators, and running **more events** about the Grants then required.

## Conclusion

Follow-up of the Regulations and the description of how this is done through strategies and plans provide a structured overview of communication activities. However, from the evidence reviewed, it appears that the approach to meeting the overarching communication aims is fragmented, with many different actors providing information / communicating at many different levels in each country. Whilst this may be appropriate and necessary when it comes to communication to sector-specific stakeholders, it can be questioned if there should be greater synergies and collaboration when it comes to the broader goal of awareness-raising, for example to the public.

The approach at national level (NFP) tends to be more consistent in terms of providing all the necessary information in strategies, than the approach at programme and project level, where more gaps start to appear. Taking this into account it is not possible to conclude that beneficiary state A or B exceeds the requirements at all levels (national, programme and project). But there are examples of states that exceed requirements at national (NFP) level, which are highlighted below.

Overall, many beneficiary states have prepared good **Communication Strategies**, however what is evident is a check-list approach to the communication requirements. There are, however some very good Communication Strategies and corresponding Annual Progress Reports (APRs) which could be used as examples:

- The Slovak Strategy and APR use common template which allows to easily see what has been achieved against the plans;
- The Cypriot and Czech Strategies include very good examples of targeting messages, e.g. in Cyprus three target audiences have been identified and segmented according to their needs in information and communication (Programme Operators; Potential and Actual Project Promoters; General Public), with specific messages to be communicated to each of the three groups;
- The Latvian and Portuguese Strategies reflect on the sequential approach of the communication activities planned.

The fact that Programme Operators and Project Promoters have difficulty in defining their strategies and plans may suggest that whilst they are used to putting information into the public domain, they find it to be more difficult to describe activities in a targeted way. In addition, the challenge of maintaining websites in English is likely to relate directly to resources. This raises questions as to whether this is really necessary, when these actors find it difficult to fulfil this obligation. But with no web statistics to confirm visits to these pages, where they exist, it is difficult to conclude on this point.

One of the most common means of exceeding the Requirements across the three levels was to make use of social media, which suggests adding this communication channel to the revised Requirements might be a good option worth exploring. However, this raises questions about a need for a more integrated approach rather than a proliferation of accounts that may be dormant or lack news.

## Recommendations

- The FMO could consider creating a common template for the Communication Strategies in order to facilitate the comparisons between the beneficiary states, and a common Annual Progress Report template, which would allow to better track the progress of the Strategies year on year;
- In designing the Communication Strategies significant progress could be made in:
  - Ensuring that beneficiary states specify the events planned
  - Exploiting more the potential synergies with story-telling, an approach that is encouraged across the information and publicity activities and that would emphasise the progress made in and impact from the financial mechanism and help to make the information more meaningful to target groups.
- Revise the structure of the strategic report to account for the potential irrelevance of the distinction between activities at NFP and at PO level or specify the reporting on “the status of implementation of the Communication Strategy” better.
- The training provided to NFP staff, POs and PPs by the FMO, or support provided by professional external communication experts can be considered a good practice. Offering dedicated communication- focused help to organisations which do not employ communication professionals would enhance both the design and the implementation of the Communication Strategies.

### 4.3 Reflecting the Grants’ overall objectives

**Question 3:**

**To what extent are the two overall objectives of the Grants - contributing to reducing economic and social disparities and strengthening bilateral relations between the donor and beneficiary states - reflected in the implementation of the communication strategies and plans?**

To answer this question we analysed how the Communication Strategies (at national level) and Communication Plans (at programme level) address the two overall objectives of the Grants. We also explored the main goals and priorities for communication among the National Focal Points, Programme Operators and Project Promoters and verified whether raising the awareness of the Donor countries’ contribution to reducing disparities and raising awareness of bilateral cooperation were considered as main goals of the actors’ communication efforts.

Sources of evidence	
■	Desk research
■	Online questionnaire of NFPs
■	Country case studies:
□	PO and PP survey

The review of the Communication Strategies reveals that all emphasise the supporting nature of the information and publicity activities, which are expected to contribute to the overall objectives of the financial mechanisms. In general, on the basis of the two broad messages of the EEA and Norway Grants, beneficiary states have defined specific messages tailored to their situation (but Croatia uses only the two general messages). However, the beneficiary states are at different stages of this process:

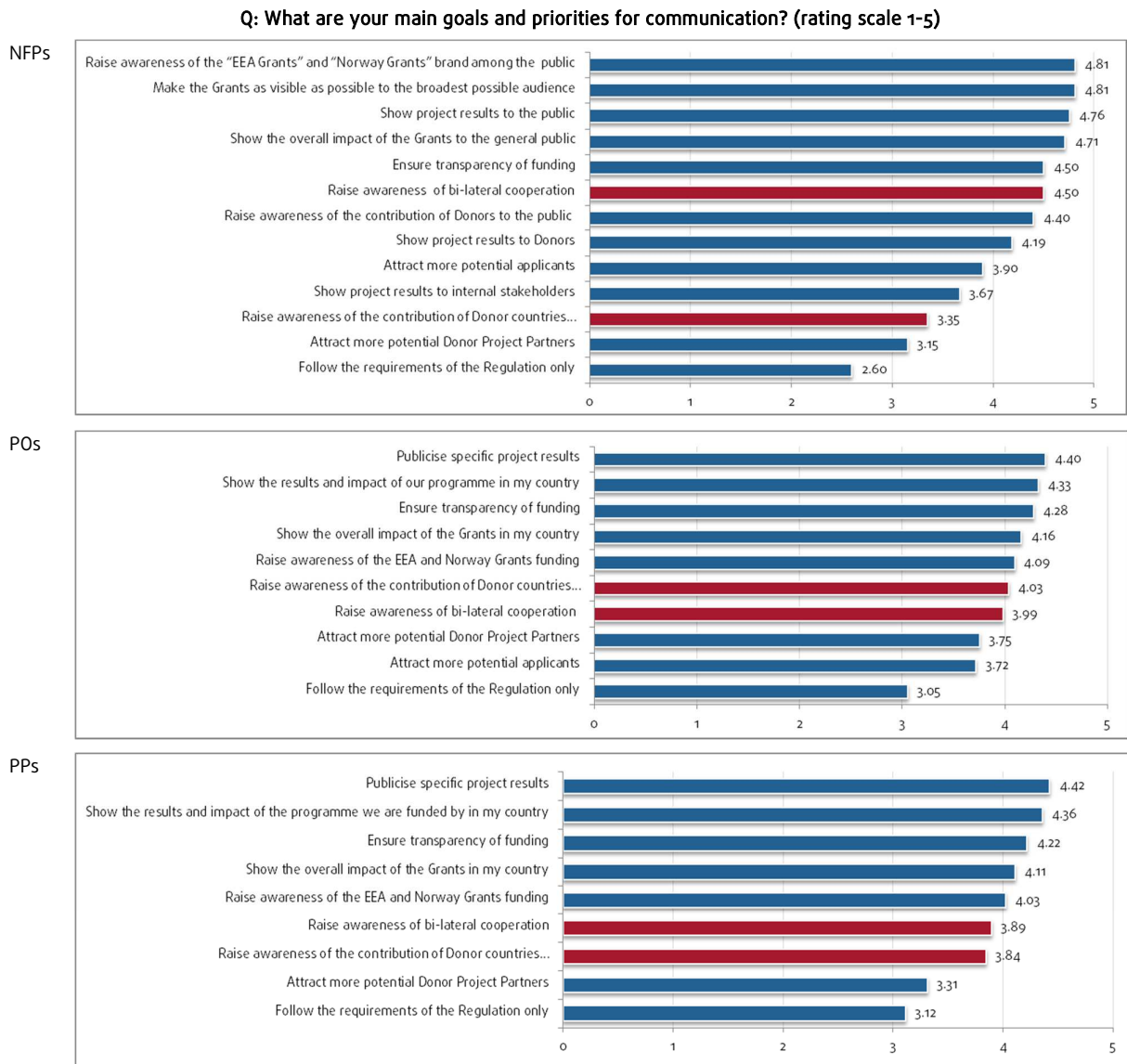
- some have no specified messages yet (e.g. Bulgaria)
- some specify the messages by target (e.g. Cyprus)
- the majority defines a general message across the two types of Grants while others tailor the messages to the type of Grants (e.g. Slovenia).

When it comes to self-reporting of the goals and priorities for communication, raising awareness of reducing economic and social disparities and strengthening bilateral relations were mentioned as important, but **not the most important goal for communication** by any of the three categories of actors. The NFPs overwhelmingly (14 out of 21 NFP respondents) rated “raising awareness on the Grants among the general public” as a top priority rating it 5 on a scale of 1 - 5. “Making the Grants as visible as possible to the broadest possible audience” was also indicated to be a key priority area.

For Programme Operators, publishing project results, ensuring the transparency of funding and showcasing the programme’s impact in their country were the key communication priority. The Project Promoters emphasised the dissemination of project results, as well as the demonstration of the programme’s impact and the transparency of funding in the beneficiary country.

The below chart highlights how different actors responded when asked about the level of priority allocated to raising awareness on the two main communication goals (*Raise awareness of the contribution of Donor countries to reducing economic and social disparities* and *Rise awareness of bilateral cooperation*).

Figure 4: Main self-reported goals and priorities for communication



In general, when comparing the levels of importance of raising awareness about the two main objectives of the Grants between the three types of actors, it was the NFPs who treated them as the most important. In comparative terms, for the Project Promoters communicating on strengthening bilateral relations was less important than for the other two actors, which is likely to relate to their focus on targeting sector specific stakeholders with their communication. Given the high-level nature of the two objectives, it comes as little surprise that state-level actors are the ones who consider the objectives as important to communicate to the public.

Furthermore, there seems to be a potential missed opportunity in strengthening the communication on the bilateral aspect of the Grants, related to the role of **Donor State Embassies**. In the current Regulations, the communication roles of the Embassies are not mentioned. Despite this, successful cooperation of the National Focal Points and the Embassies is already taking place, with the Embassies enhancing Donor visibility and highlighting the bilateral aspect (see section 7.1 of this report). Further cooperation between the NFPs and the Embassies, which could be mentioned in the future Regulations, might place communication about the bilateral aspect higher on the agendas of the NFPs.

## Conclusion

There is room for further improvement to reflect the Grants' overall objectives in the Communication Strategies, which could involve e.g. re-categorising the communication objectives mentioned in the Strategies as **goals / statements** of intent which would describe what specifically the beneficiary states are trying to achieve.

There is some misalignment in the communication aims stated in Annex 4 and the focus / priority for communication on the Grants. The two main communication aims are to focus on reducing socio-economic disparities and strengthening relations between donor and beneficiary states. The main aims do not highlight the need to raise public awareness of the Donor countries' contribution. However, it seems that this requirement has been understood as more of an imperative than the two stated aims.

The communication roles of the Embassies are not mentioned in the current Regulations. Despite this, there is already reported successful cooperation of the National Focal Points and the Embassies. The Embassies' involvement in communication efforts of NFPs enhances of Donor visibility and highlights the bilateral aspect of the Grants.

## Recommendations

To strengthen the **impact of the messages**, we recommend to:

- Align messages on the general messages of the financial mechanism to ensure that synergies are exploited
- Ensure that specific messages are worded like slogans, which are easily understood and easy to remember
- Investigate information needs and test draft messages with specific target groups
- Tailor specific messages and information to specific target groups
- Mentioning the communication roles of the Embassies and the value they can add by cooperating on communication efforts of the NFPs might place communication about the bilateral aspect higher on the agendas of the NFPs.



## 4.4 Web presence

### Question 4:

Are there dedicated websites for the EEA and Norway Grants in each beneficiary state, in English and in the language of the beneficiary state?

Apart from confirming whether such websites exist, both in English and the local language, we examined whether:

- websites give comprehensive and clear information about the Grants, including on impact and bilateral cooperation;
- web domain requirements were met where appropriate, and
- there is coherence between presentations of the Grants at different levels (national / programme / project).

#### Source of evidence

- Desk research

### National websites

At the time of conducting the websites review (December 2015), in terms of the requirements stipulated in Annex 4, on the whole, most of the websites managed by the **National Focal Points** had at least some missing elements. We are aware that significant amount of information and data could have been changed and / or updated since, and hence the review presented below should only be treated as a time-capture of the situation at the time of review.

Table 3: Summary of the BS's fulfilment of Annex 4 requirements for NFP websites (December 2015)<sup>4</sup>

Annex 4 Requirements	Beneficiary State														
	BG	HR	CY	CZ	EE	GR	LV	LT	MT	PL	PT	RO	SK	SI	ES
Domain requirements	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
English version	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Information on the overall objectives of the FMs;		✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Information on bilateral cooperation with Donor State(s)	✓	✓		✓	✓	✓		✓		✓	✓	✓	✓	✓	✓
Information on all Programmes	✓		✓	✓	✓	✓	✓	✓		✓	✓	✓	✓	✓	✓
Information on impact from the financial mechanism's support		✓					✓	✓			✓			✓	
Overview of open calls under the Programmes	✓			✓		✓	✓	✓		✓	✓	✓	✓		✓
Relevant doc's, including Strategic Reports and minutes from Annual meetings				✓	✓	✓	✓	✓		✓	✓	✓	✓	✓	✓
Link to the website of the financial mechanisms	✓	✓	✓	✓	✓	✓	✓			✓	✓	✓	✓	✓	✓
Links to all Programme websites	✓			✓	✓	✓		✓			✓	✓		✓	✓
Links to websites of other relevant institutions	✓	✓	✓	✓	✓	✓	✓	✓			✓	✓	✓	✓	✓
Contact information	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓

<sup>4</sup> Due to the suspension of the Grants to Hungary at the time of conducting the website review, no national website for the Grants has been active at that time.



Apart from the requirements set out in Annex 4, we also reviewed additional elements, which based on our communication evaluation experience are good practices in creating robust websites. The assessment is presented in the table overleaf.

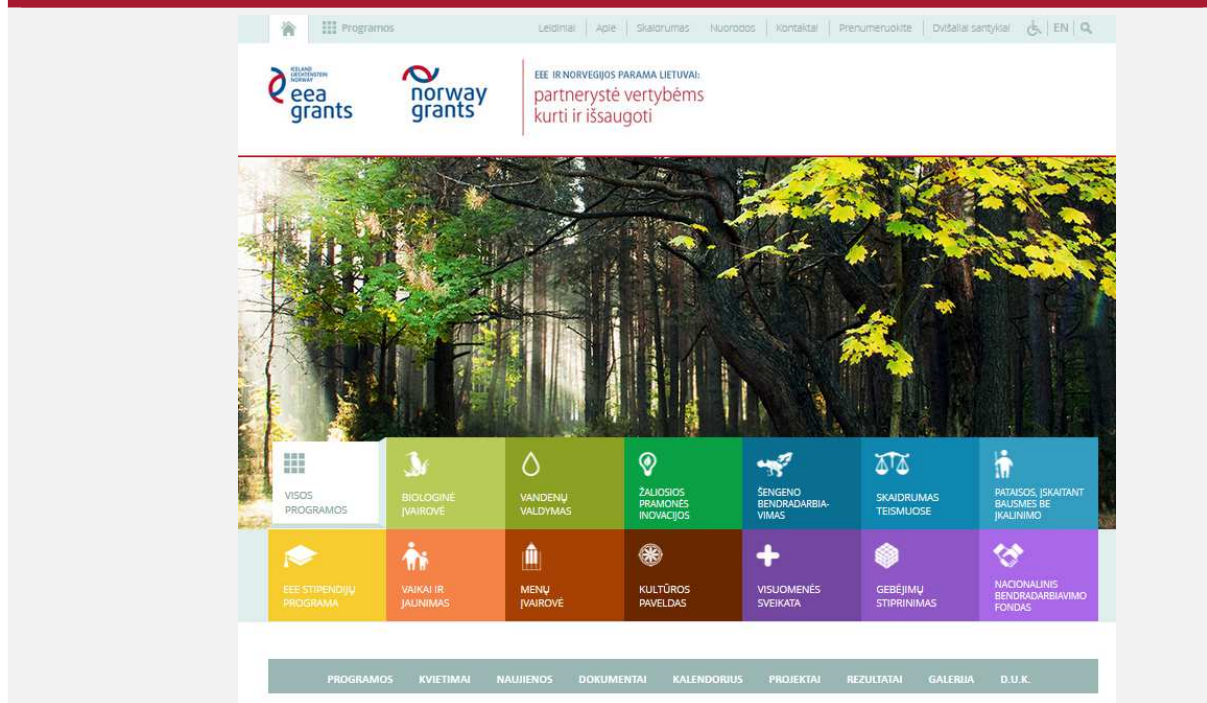
**Table 4: Summary of the BS's fulfilment of additional assessment criteria for NFP websites (December 2015)**

Additional assessment criteria	Beneficiary State														
	BG	HR	CY	CZ	EE	EL	LV	LT	MT	PL	PT	RO	SK	SI	ES
Frequently updated	✓	✓	✓			✓	✓	✓		✓	✓	✓	✓		✓
News section	✓	✓	✓	✓	✓	✓	✓	✓		✓	✓	✓	✓	✓	✓
Evidence of "story telling"											✓				✓
Information on I&P actions		✓		✓						✓					
Social media	✓			✓	✓	✓	✓	✓			✓	✓	✓	✓	✓

The extensive country-per-country review of the national (NFP) websites conducted in December 2015 is presented in the Detailed Findings Annex.

Based on the review of Annex 4 and the additional requirements, we identified the following **best practice examples**:

**Lithuania:**



An excellent website that fulfils nearly all of the requirements set out in Annex 4. It is very easy to navigate and provides relevant information in a straight-forward and informative way. The links to individual Programme websites can be found under each Programme's tab integrated in the website. The results of the Funds can be found easily and are very clearly explained. Statistics for individual Programme areas are presented in an interactive and colourful style. The website is regularly updated and there is a news section that regularly announces updates on the statuses of projects in different Programme areas. With regard to social media, there is also a link to the EEA and Norway Grants Facebook page and one can subscribe to an RSS feed on the homepage. In addition, it is possible to link and directly share individual pages in the Programmes either on Facebook, Twitter or Google+.

## Spain:

The website has arguably the best story section of any of the NFP websites, featuring plenty project stories and photos, interviews with beneficiaries, results etc. covering all programme themes: The website also includes one of the most elaborate and comprehensive and reader-friendly news sections of all the sites.

### Programme websites

On the whole, **most of the reviewed programme websites met most of the requirements**, however, there was a **significant variation** observed between countries and even within a single country: the differences from one programme website to another were considerable. Across the board, with one exception, the content on the websites were available in both English and the native language. Information on the Programme Area, the Financial Mechanism and details on open calls were generally available with only a handful of programme websites failing to meet one or more of these requirements. Contact information was provided on most programme websites. Information about the selection procedure and its criteria was almost universally available, as was information about funded projects within that programme. Less than half of all the programme websites reviewed included information on the impact of the programme or had relevant documents such as Annual Programme Reports available on the website. Three requirements were missing for a majority of websites. These were: links to the DPP's website and to other relevant institutions, as well as a links to the website of the Financial Mechanism in the beneficiary states.

### Project websites

**Project Promoters** are required to make information on their project available on the Internet, either through a dedicated website, or through dedicated web pages on an existing website. Projects receiving a minimum € 50,000 grant need to have dedicated project web pages; projects receiving a minimum of € 150,000 grant and those having a donor project partner are required to have dedicated project web pages with information in English.

Bearing in mind that the sample of project websites which we have reviewed may not be representative of the plethora of projects, we identified a **tremendous variety in the quality** of the web presence of projects.

The ways in which Project Promoters addressed the requirements of Annex 4 varied from professionally prepared full websites, which covered all of the requirements in an engaging and user-friendly manner (e.g. a website for a Bulgarian project: <http://www.iser.bas.bg/metemss/en/index.html>), to very poor attempts at website presence. Remarkably some of the weaker websites did not even mention at all that a given project received support from the EEA / Norway Grants.

## Conclusion

All of the beneficiary states have dedicated websites in national languages and in English. However, our study highlights great variability, particularly at programme and project level (where it is possible to find project websites at all, due to broken links, etc.).

Even though the national websites overwhelmingly fulfilled many of the requirements stipulated in Annex 4, these sites were not consistently presenting information with regard to the impact of the Grants in a majority of cases and in the case of six Beneficiary States, national websites had no links to programme websites. The lack of information regarding grant impact suggests a disconnect with project results, which may reflect the fact that projects are mainly not required to provide web content in relation to their projects for use at national level. The lack of links between national and programme sites underlines the fact that information about the Grants is not pulled together to provide an overview of the bigger picture of funding across individual states. There is a need for a more integrated approach.

Whilst there are examples of good practice in web presence, it does not appear that clear and consistent information is being provided at all levels. There are some gaps at national level, as highlighted above, and there is even greater variability at programme and project level in terms of the quality of website content. Even the different language versions of the same website varied tremendously. In practice, it appears to be a challenge to maintain different language versions, particularly at project level.

There is proliferation of information on the web with regards to the hundreds of projects supported by the Grants in each country. This situation facilitates inconsistencies in approach in terms of content and layout, and can make it difficult to actually find project references. As a result, information about the Grants is spread very thinly and only easy to find for those who know where to look. The fact that some of these projects are hosted on the sites of other organisations ensures a degree of visibility towards the users of these sites and there is no reason for this additional visibility to be cut. However, this should be in addition to a much more substantial web presence, for example via a single portal where all the supported projects could be found.

The lack of common visual identity and format between the individual websites at all levels reduces the visual coherence and impact of the presentation of the Grant systems as a whole.

## Recommendations

- We recommend that consideration 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, with several advantages, including making it much easier to show the volume of support that is provided through the Grants, as well as being a “one stop shop” for any information on the Grants in a given country. Such means of presentation are much clearer and user friendly, and furthermore ensure following a consistent visual identity<sup>5</sup>.
- The FMO could consider defining, or requiring NFPs to define, common project and / or programme web templates that could allow a more consistent approach to the digital presence of projects / programmes. Rather than focussing efforts on maintaining a web presence in English, 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.
- The FMO should ensure (e.g. by introducing an obligation in the Regulations directed at the Project Promoters) that it is provided with the most up-to date links to all the projects that are featured on the main website (eeagrants.org). Currently multiple links to the project sites featured in the project portal are broken.
- An adjustment is recommended to the requirements for the Project Promoters, no longer requiring them to have to translate their project sites into English, but instead providing small amount of information on their project which could then be featured on a national portal.
- 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.

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<sup>5</sup> We are aware of the possible difficulties in addressing this requirement, especially when the present NFP websites are hosted with the pages of national ministries that have rules and obligations limiting the page layout (e.g. Czech Republic, Poland). We recognise that creating national portals might require additional effort and possible pressures from the FMO (e.g. in the form of a legal requirement which the ministries would have to adhere to).

# 5 Implementation

## 5.1 Main channels of implementation

### Question 5:

**What are the main channels of implementation for effective communication strategies?**

To answer this question we have explored which approaches and techniques are being used by the National Focal Points, Programme Operators and Project Promoters in the different beneficiary countries. We paid special attention to communication through social media, investigating whether they are being used already, despite not being explicitly required by the current Regulation.

Source of evidence	
■	Online questionnaire of NFPs
■	Country case studies:
□	desk research,
□	stakeholder interviews
□	PO and PP survey

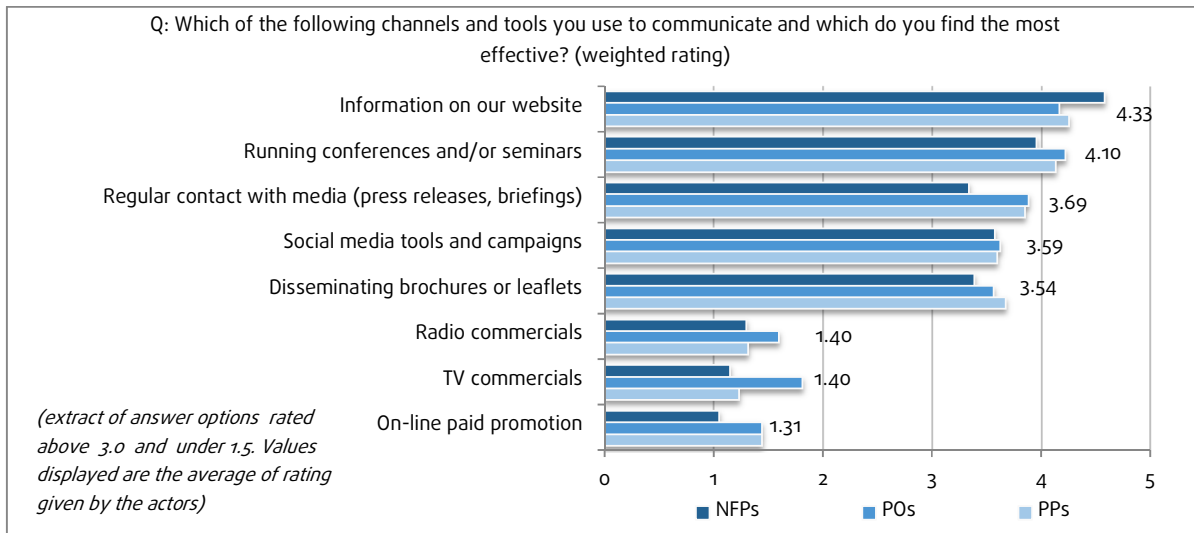
The criterion of ‘effectiveness’ usually considers how successful a given action has been in achieving or progressing towards its objectives. For communication, extent of target group reach is a critical success criterion. However, to be able to assess reach it is necessary to monitor the channels and tools used to reach target groups. The unfortunate absence of details regarding monitoring criteria and monitoring data in the majority of Communication Strategies and Plans (as discussed under Question 2) and further under Question 12) is a serious limiting factor in the assessment of effectiveness.

Nonetheless, this question implies that some communication channels work better than others, whereas it is more realistic to understand that different channels and tools serve different purposes. There simply is no one-size-fits-all “best” channel or tool. The effectiveness of a particular channel or tool relates both to the way that it is used (i.e. the timing, type of content and the relevance and persuasiveness of the messages conveyed), and to the size of the budget in relation to the size of the target population (further discussed under Questions 6 and 7).

The results of the **National Focal Point** survey suggest a high focus on the internet for example **websites and running conferences and seminars**. Many NFPs also reported being regularly in contact with the media through press releases and briefings, using social media, or disseminating electronic newsletters. Other mass media channels and tools were seldom used, in particular TV programmes and commercials, and radio broadcasting. This probably reflects the high cost of these types of activities. Generally, the use of websites was considered “effective to a great extent” and these were also the most popular communication tool overall.

When asked during the in-depth interviews to identify the main communication tool they use, and which one they consider the most effective, all of the interviewed NFPs mentioned their **websites**. Some NFPs were quick to add “**social media**”, however others admitted they do not use them to a great extent, as the use of social media was not required by the Regulations.

Figure 5: Channels and tools for communication



According to the survey, for the **Programme Operators**, providing information on their **website** together with organising conferences were considered as the most effective communication tools. Regular contact with media as well as social media tools and campaigns were also thought to be effective. POs seemed to be less in favour of using radio and TV commercials or online paid promotion. The communication channels and tools most often used by the interviewed POs also were **web-based instruments** (website or social media presence), which are most *“direct, effect and simple way to communicate both results and important information for potential applicants.”* It was also noted that these instruments allow easy feedback from users.

The most effective electronic communication tool according to the surveyed **Project Promoters** was to provide information through their **websites, as well as direct contact**, through the organisation of seminars and conferences, as well as regular interaction with media. The dissemination of printed materials as well as social media tools and campaigns also placed in the top most effective communication tools, according to the surveyed PPs. Online paid promotion and TV commercials were used the most seldom and considered the least effective. The interviews confirmed the PPs’ preference for websites as the most often used tool. During the focus groups, the Project Promoters confirmed that to the best of their knowledge, the Internet is also the main source of information for potential project participants.

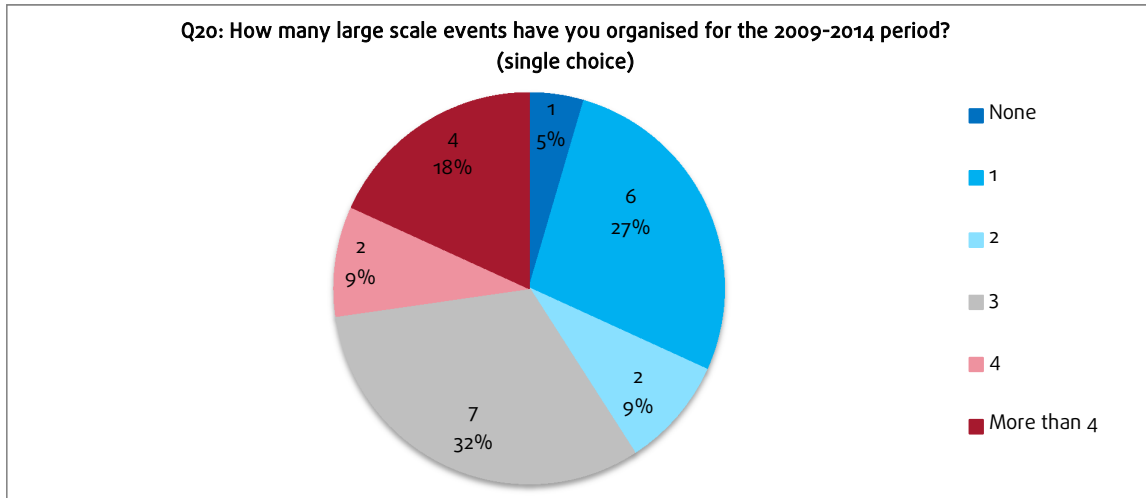
### Communicating via events

Annex 4 includes the requirements of organising events for each of the three categories of actors:

- National Focal Points need to carry out at least three major information activities on progress in and impact of the Grants,
- Programme Operators are required to organise at least two major events on progress in and impact from the Programme and the Grants,
- Project Promoters should organise at least three information activities on progress, achievements and results in the project, and for projects whose grant size is less than € 500,000, two information activities are sufficient.

We focused our investigation on how the National Focal Points fulfilled their requirements. The figure overleaf shows that a majority of survey respondents noted that they had organised at least three large-scale events during the period under review.

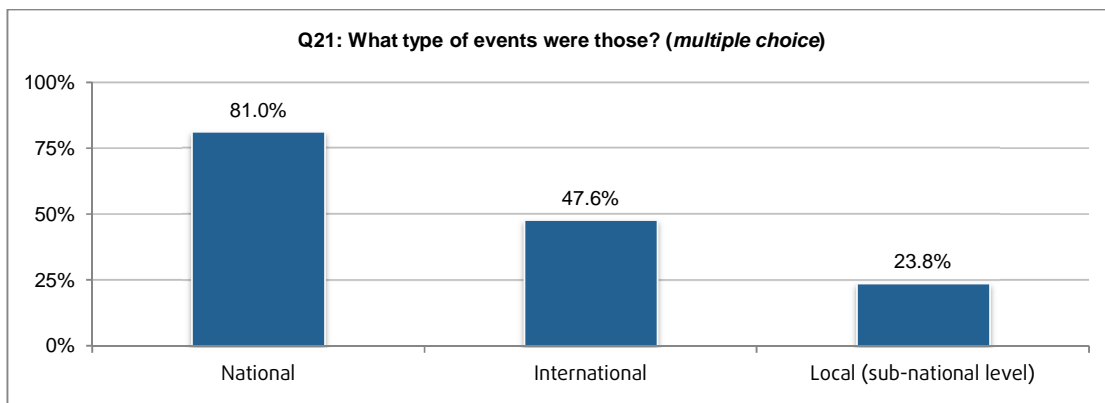
Figure 6: Events organised by NFPs between 2009 and 2014



A large proportion had organised only one event during that period and over 40% of respondents indicated that they had not yet organised the required three large-scale events, although the grant period is still running and it is understood that it is likely that NFPs will hold a closing event in 2016 and 2017. One respondent reported no large-scale event, but further analysis of the survey results indicated that the second respondent from the same country reported that in fact one large scale event had been organised. An additional factor to take into account here is that there is no common definition of what constitutes a ‘large-scale’ event in the Regulations. Therefore, there may be significant variation in meaning as highlighted by the following responses.

Regarding the type of events organised by the NFPs in the reviewed period, over 80% reported organising an event at national level:

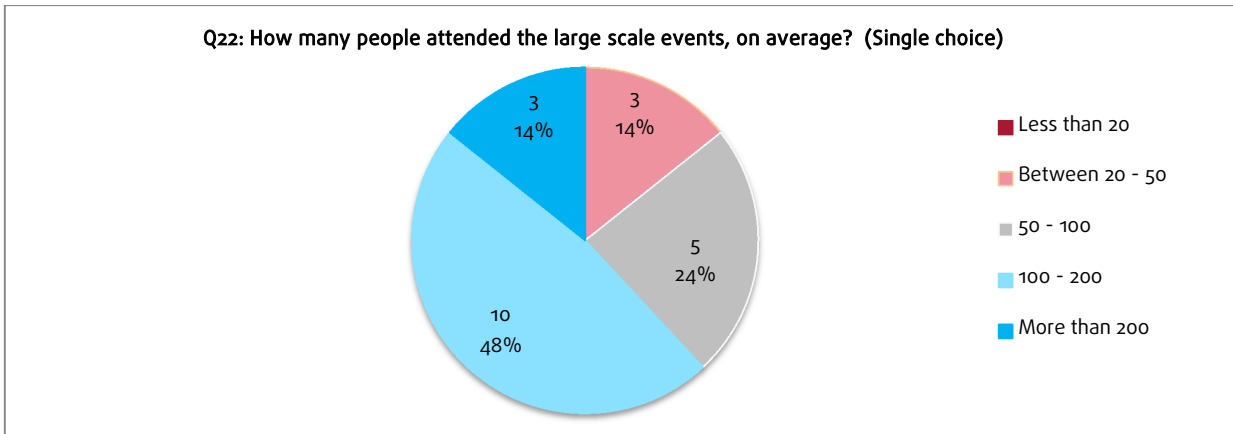
Figure 7: Type of events organised





Close to half of the events organised by the NFPs were attended by 100 to 200 people on average. There were no responses indicating smaller scale events attended by 20 people or less.

Figure 8: Number of event attendees



An example of good practice in NFPs organising large scale events could be as follows:

Poland:



Over the holiday period (whole of August 2015) on the Polish coast, with the location changing each weekend, three huge tents were erected showcasing the work done under **research, health** and **bilateral cooperation**. Over 21,000 of members of the public visited the tents.



## Conclusion

National Focal Points, Programme Operators and Project Promoters all believed websites to be the most effective communication tool, and the one that they use most often. However, with a lack of evidence with regards to numbers of users (visits and downloads) it is not possible to assess to what extent the websites are actually effective or whether the assessment made by NFPs relates more to the fact that websites are one of the main required tools.

Websites can be useful as a repository to present information that can be accessed at anytime from anywhere they are do not facilitate any outreach to unaware target groups. This means that unless efforts are made to bring users to these sites, for example through digital promotion and referencing via other communication channels, the number of users is likely to be low.

There were some differences of opinions regarding the use of social media, mainly relating to the fact that these are not explicitly mentioned in the Regulations. Overall, web-based communication seemed of particular importance to Programme Operators and Project Promoters who do not have sufficient human and financial resources to make use of more expensive channels (such as mass media).

There is a mismatch between the high level of priority placed on reaching the public and indications by National Focal Points that websites are their most effective tool. Websites are not an effective tool for reaching the public. At the same time, there are some examples of very good websites that present information in a way that is understandable and attractive for wider publics.

## Recommendations

Taking into account the mismatch between the high level of priority placed on reaching the public and indications by National Focal Points that websites are their most effective tool, it is necessary to take a more focussed approach. An example might be concentrating the responsibility to communicate to the wider public 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 in parallel to large scale events, with more significant reach of the public. Additional budget will be required for this activity.

Additionally, a clear definition of what constitutes a 'large event' would be recommended.

## 5.2 Capacity and resources for communication

### Question 6:

**Which beneficiary states have an adequate and effective implementation structure for their communication strategies and plans in place?**

### Question 7:

**What is the budget and the resources for implementing the communication strategies and plans?**

We investigated implementation structures in different beneficiary states, including:

- resourcing levels allocated to communication;
- involvement of dedicated /experienced and resourced communications team/people;
- budget for implementing the Communication Strategies (in National Focal Points) and Communication Plans (in Programme Operators).

#### Source of evidence

- Desk research
- Online questionnaire of NFPs
- Country case studies:
  - Desk research
  - Stakeholder interviews
  - PO and PP survey

The adequacy of the communication resources is understood here in terms of sufficiency of resources to reach target groups. As per the Regulations and in particular Annex 4 these are expected to be:

target audiences of..		
NFPs	Programme Operators	Project Promoters
<ul style="list-style-type: none"> <li>■ widest possible audience</li> <li>■ citizens of the Beneficiary State,</li> <li>■ potential and actual beneficiaries</li> <li>■ Programme Operators,</li> <li>■ potential and actual Donor Programme Partners</li> </ul>	<ul style="list-style-type: none"> <li>■ citizens of their state,</li> <li>■ potential and actual beneficiaries</li> <li>■ potential and actual Donor Programme Partners</li> </ul>	<ul style="list-style-type: none"> <li>■ widest possible audience at national / regional / local level</li> <li>■ project participants</li> </ul>

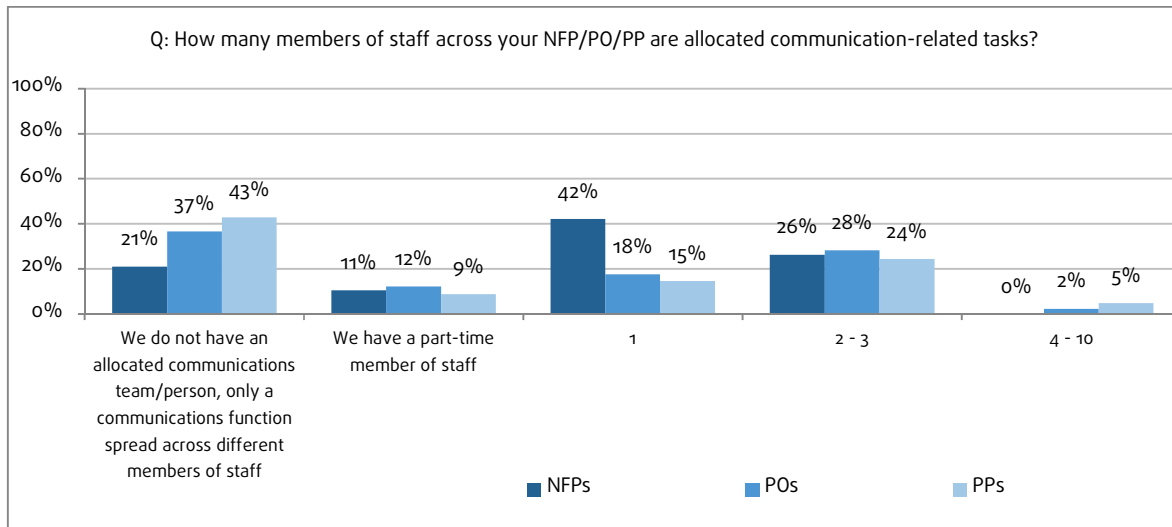
### Overall implementation structures

It is difficult to assess implementation structures at national and programme level because implementation structures are not clearly described in the 2013 – 14 Communication Strategies and Strategic Reports. The beneficiary states provide information on the administrative arrangements to varying degrees in their strategies. Information is usually provided on the general communication budget and the contact details of the person responsible at the NFP. But information on the division of tasks and responsibilities is less consistent. It is present only in half of the strategies and in rather general terms (e.g. stating “*The stakeholders’ involvement should be ongoing and the NFP shall make sure that relations with the stakeholders will be strong*” or “*we will cooperate at all levels*”, but without specifying what the ‘cooperation’ will consist of). In Strategic Reports, the sections on information and publicity are relatively short, as the Reports correspond to the early phase of the programming period, with the necessary learning process for the actors involved and the setting up of the required administrative arrangements.

### Human resources

In the majority of cases, the National Focal Points, Programme Operators and Project Promoters are supported by dedicated communication staff. Also, we see that approximately 25% have 2 or 3 staff. The results suggest higher levels of communication resourcing at national level with NFPs and that levels go down at programme and then project level

Figure 9: Number of staff with allocated communication tasks in NFPs, POs and PPs

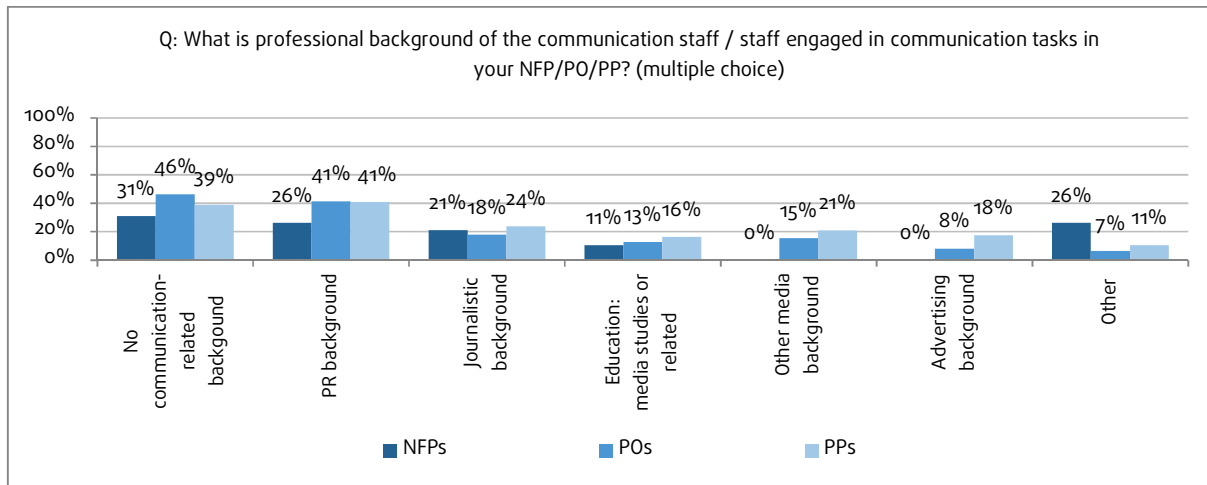


Most **National Focal Points** reported that they have one member of staff focussed on communication activities. However, close to one-fifth (21%) indicated that they had no allocated communications team or person. They did, however, have access to support from the organisation’s general communication team, which was not focussed on the Grants. During the interviews, the National Focal Points expressed their desire that the human and financial resources made available to them would need to be extended to make the communication efforts more effective.

At programme level, most **Programme Operators** (37 %) do not have dedicated communication staff. But close to a third (26%) reported that they have from 1 to 3 members of staff in charge of communication tasks. Most of the surveyed **Project Promoters** (43%) also do not have a designated communications team or officer, and are spreading the communications tasks and activities across different members of staff. However, the second most popular response of the surveyed Project Promoters was having two to three members of staff dedicated to communications.

As visible from the figure below, close to a third of communication staff in **NFPs** had no communication-related professional background. Also among the surveyed **Programme Operators**, almost a half of the staff responsible for communications had a professional background unrelated to communications. This was also the case among the majority of the **Project Promoters**. The second most prevalent professional background among communication staff at all three levels was PR, followed by journalistic background.

Figure 10: Professional background of communication staff



### Financial resources

At least half of NFPs (8 out of 15) indicated that they allocate a specific percentage of their management costs to communication activities. The budgets, reportedly, range from 10% to 30% of the management costs. However, some NFPs indicated that they do not allocate a specific percentage of the budget to communication, but instead put aside a specific amount for pre-planned communication activities.

Table 5: Beneficiary States reportedly allocating % of management costs to communication

Allocate % of management costs to communication	Do NOT allocate % of management costs to communication	Did not provide an answer in the survey
Bulgaria	Croatia	Estonia
Cyprus	Greece	Latvia
Czech Republic	Malta	Slovenia
Lithuania		
Poland		
Portugal		
Romania		
Slovakia		
Spain		

During the in-depth interviews, several NFP representatives were also clearly displeased that communication is not considered a priority compared to other implementation issues by higher levels of management within their organisations. A few NFP representatives suggested that the financial resources to finance communication activities should come directly from the EEA and Norway Grants, for instance as a percentage of the overall Grant allocation.

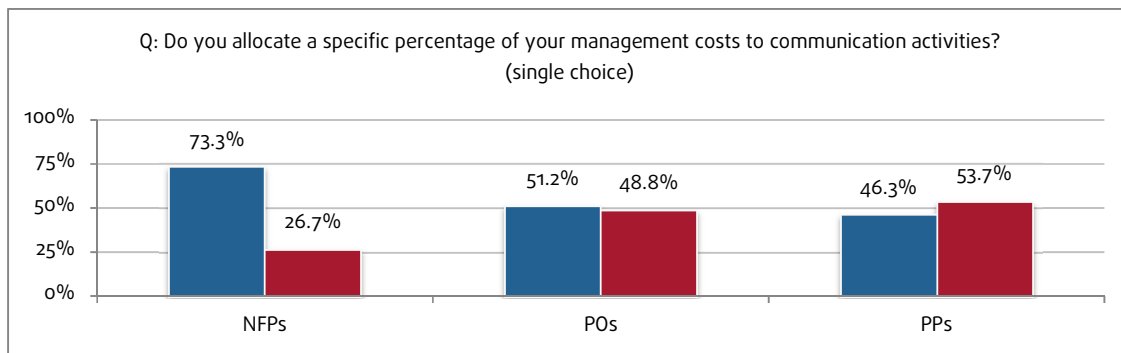
A majority of surveyed Programme Operators in Slovakia and Poland answered this in the negative, whereas more of the surveyed POs in Lithuania, Portugal and Bulgaria reported allocating a special budget than not. In particular, more than 83% of the participating POs from Lithuania stated that they have allocated a specific percentage of their management costs to communication activities.

In their open responses, the POs were invited to say the percentage of their budget allocated to communication activities and their answers were as follows:

- Bulgaria: between 2% and 55%, average 17.8%
- Lithuania: average 22%, all POs mentioned values around 20%
- Poland: between 2% and 15%, average 6.3%
- Portugal: mentioned values around 13%
- Slovakia: between 0.5% and 10%, average 6.0%

The **Project Promoters** were asked only whether they allocated a specific amount of their budget to communication activities. A majority of surveyed PPs in Bulgaria and Poland answered this in the negative, whereas more of the surveyed PPs in Lithuania, Portugal and Slovakia reported allocating a dedicated communications budget than not. The reported allocated budgets varied considerably even within individual states, from 50% to under 1%.

**Figure 11: Budget allocation for communication activities**



## Conclusion

Overall, the implementation structures for communication are not clearly defined in the Communication Strategies and the corresponding Strategic Reports for 2013 and 2014. There is also very faint evidence (if any) of defined implementation structures in the Communication Plans on programme level.

There is no consistent approach regarding the available resources and budget for communication among the beneficiary states. The differences between the amounts of their budget allocated to communication activities varies from over 50% to under 1%. Whether or not this is adequate relates to the size of the target group and the objectives set. As highlighted elsewhere in this document, if the goal is to generate visibility with the general public then the sufficiency of these amounts can be called into question.

For most of the actors, the persons taking care of communicating activities either work alone or with a support from another person. However, it is very often the case is that they do not have an allocated communications team/person just a communication function spread between the different team members.

The reported profiles of the people dealing with communication also suggest that these are very seldom communication professionals. This suggests that detailed, careful guidance and support is required for the communication about the Grants to be effective on all three levels (national, programme, project). At the same time, this element together with funding restrictions limits what it is possible to achieve and can translate into difficulties in for example turning project results into stories (as highlighted in the next section) and making information interesting and attractive for the media.

## Recommendations

- The FMO could consider defining a separate budget line destined only for communication activities, e.g. a certain percentage of the overall Grant's allocation at all three levels. This could be useful given that not every institution recognises the importance of hiring a communication professional.
- If the FMO wants to significantly increase the profile of the Grants with the wider public, then consideration could / should be given to allocating a more significant amount of runs to allow some form of advertising / communication campaign including via mass and digital media.

# 6 Effectiveness and impact

## 6.1 Communicating results

### Question 8:

How are results defined and communicated?

In order to answer this question, we focused foremost on the story-telling approach in communication activities. We did this for two reasons: first of all, at the time of the review most of the projects were still ongoing and as such had not yet produced results for communication. Secondly, the story-telling approach is an element of strong interest to the FMO, and has been a key element in trainings and workshops conducted by the FMO for the National Focal Points and selected Programme Operators. Although not explicitly required in the Regulations, all the actors were expected to follow story-telling as a way of communicating.

We reviewed the Communication Strategies of the National Focal Points and their Strategic Reports, aiming to identify particularly good examples of story-telling. We investigated how different beneficiary states share the success stories with potential beneficiaries, potential partners from the Donor States, and the wider public. Finally, we looked for coherence of the story-telling approach at different levels (national / programme / project).

#### Source of evidence

- Desk research
- Online questionnaire of NFPs
- Country case studies:
  - desk research,
  - stakeholder interviews
  - PO and PP survey

#### Story telling

Presenting the project results as a 'story' not just a sum of facts and figures. It may be a narrative describing the project, or a personal story of an individual affected by the project.

### Story-telling in Communication Strategies and Strategic Reports

On the **national (NFP)** level, there is limited evidence of story-telling in half of the reviewed Communication Strategies (Bulgaria, Estonia, Hungary, Malta, Poland, Romania, Slovakia, Spain), and it is of unequal quality. For instance, Estonia emphasises the importance of story-telling and of the use of examples of concrete projects when communicating results to raise the target groups' awareness and knowledge about the grant scheme. Hungary also refers to the identification of best practice projects for experience sharing. At the other end of the spectrum, Spain's Strategy indirectly refers to story-telling too when it aims at "present[ing] the progress achieved" to inform about the scheme. But the approach is not further specified.

The information and publicity sections of the Strategic Reports we reviewed focus on the activities implemented with an effort to provide concrete examples of information and publicity measures. Information and visibility events and information on the development of the website were particularly prominent. In a few cases, the description of the activities includes **anecdotal evidence of story-telling**. With some notable exceptions, **the reports provide (very) limited information on the results achieved**. The presentation of both indicators and an assessment of the results by activity on the basis of the targets defined in the Strategies is hardly ever available (with Croatia being a notable exception), but an effort is made to detail quantitative and/or qualitative evidence of the implementation progress.

## Sharing success stories

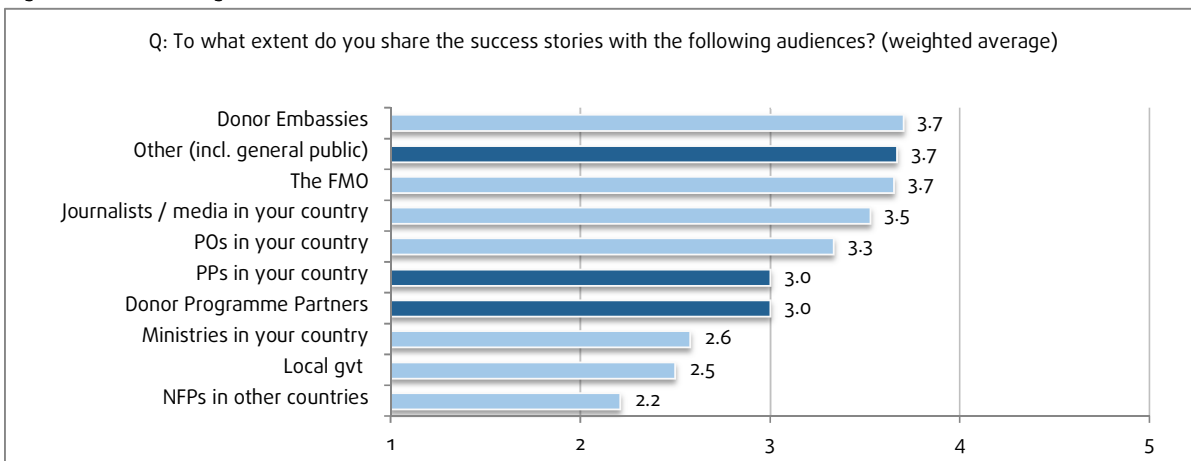
**National Focal Points** were asked in the survey whether or not they had mechanisms in place to track best practices and success stories. Their answers were mixed, suggesting that this is an area where more guidance / sharing of best practice between NFPs could possibly be useful. Overall, mechanisms were more often put into place at Programme level than at Project level. Some NFPs gave details about the types of tracking mechanisms put in place, which included:

- Biannual or quarterly Project Progress reports, in addition to monthly meetings (Cyprus, Slovenia)
- Regular contacts dedicated to communication (Greece)
- Requests for information from Programme Operators and Project Promoters on a regular basis (Spain), obtained with relative success on occasion (Bulgaria) or rarely (Poland)

In the surveys we asked the three categories of actors (NFPs, POs and PPs) to which extent they share the success stories with several types of audiences.

According to the **National Focal Points'** survey, the success stories were most often shared with stakeholders and audiences such as Donor Embassies, the general public and the Financial Mechanism Office. Efforts were also made to share the stories with the national media and journalists. Sharing success stories with the PPs (beneficiaries) and the Donor Programme Partners was reported to be happening to a lesser extent.

**Figure 12: NFPs sharing success stories**



During the in-depth interviews, the National Focal Points almost universally highlighted that since they themselves do not implement any programmes (bar in cases such as Slovakia, when the NFP is also a Programme Operator), their approach to story-telling is very much dependent on the information passed on from the POs and the Project Promoters, which varies both in quality and quantity. There has been anecdotal evidence of stories which have received large media attention, but not in a positive way: for example a project in Lithuania, which targeted prisoners and allowed them to serve the last part of their sentence in shelters with relative freedom, reportedly received substantial negative media attention. Another reported problem with the story-telling approach was the **belief of some actors that projects which are “technical” in nature, e.g. deal with environmental monitoring, cannot be used as a story.**

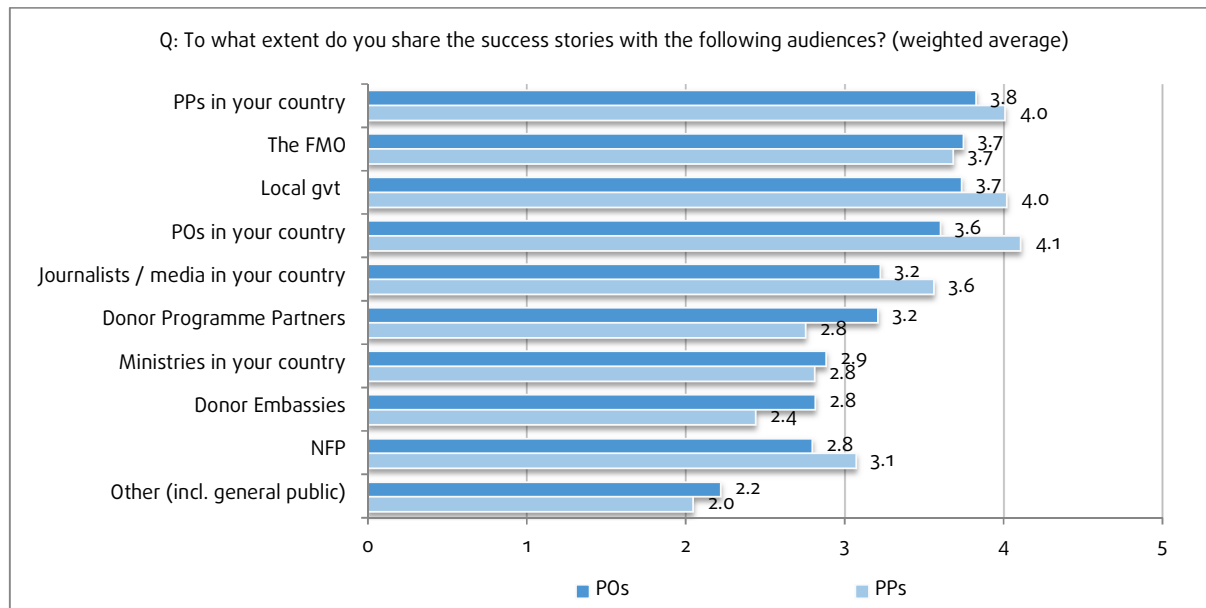
The surveyed **Programme Operators** reported most often sharing success stories with Project Promoters (beneficiaries), the Financial Mechanism Office and the local government. They have also shared with other Programme Operators in their country. Reflecting the lack of formal reporting structures, Programme Operators reported being less concerned with sharing stories with the NFP. According to their answers, the surveyed Programme Operators were also relatively less likely to share success stories with Donor Embassies in their countries and ‘other’ stakeholders, including the general public.



The interviews with the sample of Programme Operators suggested, however, that whilst the POs almost universally see the benefits of communicating results in this way, some POs still find the concept of story-telling challenging from the more 'operational' perspective, i.e. sometimes struggle with turning results received from the Project Promoters into a story.

For the **Project Promoters** in the five case study countries the key audiences for success were reported to be Programme Operators, which could be a good indicator of successful cooperation. Unsurprisingly, local government was also mentioned as one of the priority audiences. Interestingly, the Project Promoters reported also sharing the stories with other Project Promoters in their countries. The Donor Programme Partners, as well as Donor Embassies and 'other' audiences such as general public were not the types of stakeholders with which, reportedly, the Project Promoters shared.

**Figure 13: POs and PPs sharing success stories**



Several of the **key opinion formers** who took part in the focus groups agreed that it is the people and their stories which are attractive for the media. This was further highlighted by the fact that the participating journalists considered the story-telling approach as useful for being featured in the press without intensive editing. However, some agreed that infographics presenting the key achievements and spending within a project might be more effective in reaching decision-makers.

## Conclusion

The National Focal Points are the actors who take on story-telling to the general public (communicate 'out'), whilst the Programme Operators and Project Promoters tend to communicate the stories 'up' (to NFPs or POs) or 'down' (to the PPs). There also seems to be scope for greater sharing between NFPs in different countries and it may be useful for the FMO to consider mechanisms to facilitate this for example via some kind of closed platform or online group.

Although the actors appreciate the relevance of story-telling for reaching wider audiences, which is also confirmed by the key opinion formers, there are some issues of more 'operational' nature, i.e. the creators of the stories (POs and PPs) struggling with translating the project results into stories which could be

disseminated 'up' and 'out'. This may contribute to the apparent disconnect between project / programme and national level with stories and project information not reaching NFPs. If NFPs are to take a lead on outreach to the public (a role that is not prioritised in the Regulations where all actors NFPs, Programme Operators and Project Promoters are described as communicating to the public), then there needs to be a better flow of information from projects.

## Recommendations

- Include the requirement for sharing success stories 'up' in the Regulations (or the Annex)
- Consider creating a shared platform accessible by the actors at all levels (national, programme, project) for sharing success stories
- Provide training and / or clear guidance on developing success stories from project results

## 6.2 Perception and awareness of the Grants and Donors

### Question 9:

What is the image and perception of the Grants?

### Question 10:

What is the awareness of the Donors among key opinion formers? How is Donor states' visibility and reach being measured across beneficiary states?

To answer these questions we reviewed:

- existing baseline data on the awareness of the Grants which have been collected in several beneficiary states;
- the main target groups for raising awareness about the Grants for National Focal Points, Programme Operators and Project Promoters;
- use of EEA and Norway Grant branding;
- levels of awareness of the Grants and Donor visibility, and
- how Donor visibility is ensured and measured.

#### Source of evidence

- Desk research (incl. baseline data)
- Online questionnaire for the NFPs
- Country case studies:
  - desk research,
  - stakeholder interviews
  - PO and PP survey
  - Focus groups

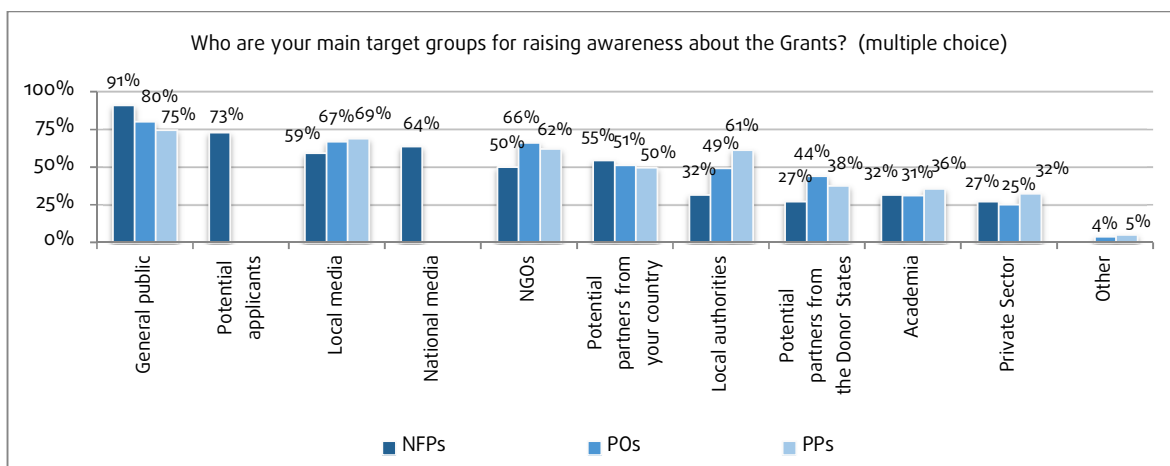
## Baseline studies

Several beneficiary countries (Czech Republic<sup>6</sup>, Estonia<sup>7</sup>, Hungary<sup>8</sup> and Poland<sup>9</sup>) conducted baseline studies in relation to awareness-levels of the Grants among their citizens. In the **Czech Republic** the study showed that public awareness of the EEA and Norway Grants was 27%. The study's authors believed this to correspond to the limited amount of grant assistance distributed in the country compared to the much more significant allocation of the EU Structural Funds' Operational Programs. In **Estonia**, in 2013, it appeared that 27% of Estonian residents between the ages of 18 to 74 knew that Estonia received support from the EEA and Norway. By 2014, the awareness rate rose to 35%. In **Hungary**, some data was collected in a qualitative study, hence not comparable or of statistical relevance to the country. In **Poland**, surveys on recognisability of the EEA and Norway Grants brand were carried out in 2013. The surveys showed that close to 14% of adults had heard about the EEA and Norway Grants.

## Target groups

In the three surveys carried out as a part of this study (addressed to National Focal Points, Programme Operators and Project Promoters), the general public was overwhelmingly cited by all respondents as a primary target.

Figure 14: Target groups for raising awareness about the Grants



A majority of **National Focal Points** considered potential applicants and national and local media as other important target groups. This finding regarding potential applicants is somewhat striking taking into consideration responses to another survey question, where attracting more potential applicants was not seen as a communication priority by the NFPs. The surveyed Programme Operators and Project Promoters most frequent answers, in addition to the general public, were local media and NGOs. The surveyed POs and PPs were least concerned about raising the levels of awareness of private sector actors.

Several **key opinion formers** who took part in the focus groups believed that the key issue would be defining who should be the target audience of communicating about the Grants: the general public or specific sectors such as universities, local government or NGOs. The subsequent comments highlighted that trying to target

<sup>6</sup> Communication Strategy for the Czech Republic - EEA and Norway Grants 2009 – 2014 and: *Insight*, March 2012.

<sup>7</sup> Public Opinion in Estonia on European Structural Assistance and on European Economic Area and Norway Grants, Fartum & Ariko 2014

<sup>8</sup> Tamas Polgar: Awareness and perceptions of the Grants: an example from Hungary 04-09, EEA and Norway Grants: Information and Communication Workshop, Brussels, March 2012.

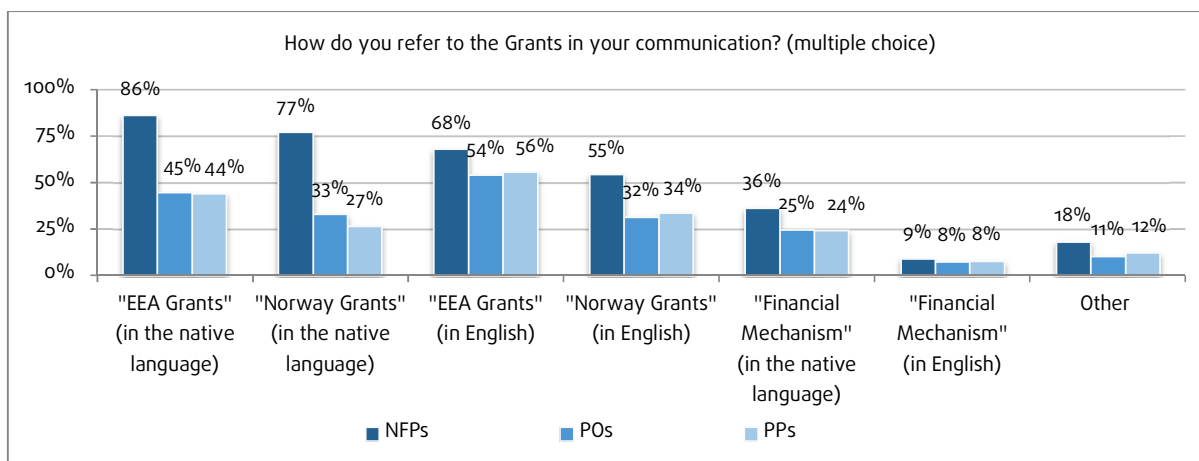
<sup>9</sup> Strategic Report on the implementation of the European Economic Area Financial Mechanism and the Norwegian Financial Mechanism 2009-2014 in Poland in 2014.

the “general public” is futile (especially given the size of the Grants compared to the EU Structural Funds, with which the Grants are routinely getting confused) and it would make far more sense to target specifically potential beneficiaries only, and count on the word-of-mouth to spread the message to other audiences.

## Branding

According to their survey responses, a large majority of National Focal Points refer to the Grants as “EEA Grants” and “Norway Grants” translated in their own language. The Programme Operators and Project Promoters seemed to favour the name “EEA Grants” in English and in their native languages.

Figure 15: Branding of the Grants



In their open responses to this question, NFP cited “*EEA and Norway Financial Mechanism*” (two respondents) and the full appellation - *Grants from Iceland, Liechtenstein and Norway*- in their native language. For the POs, national differences can be observed, for instance there is significant use of *Financial Mechanism* in Bulgarian by Bulgarian POs, due to the fact that the Grants are referred to in these terms on the official programme documents in Bulgarian. For the PPs, in their open answers, many Bulgarian PPs indicated the use of the endemic *Norwegian Programme*, as well as the full official translation *Financial Mechanism of EEA and Norway Financial Mechanism*. In the other case study countries, local translations were also popular such as *Mechanizm Finansowy EOG 2009-2014* in Poland and *Apoio da Noruega, Islândia e Liechtenstein* in Portugal.

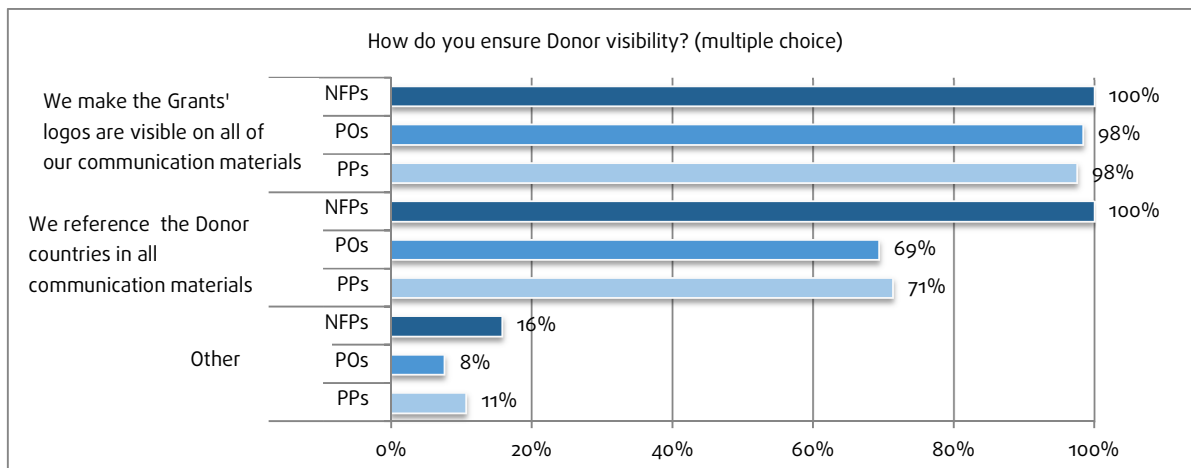
Additional feedback highlights that in certain beneficiary states several of the non-State operated programmes or projects have been given names of their own (e.g. in Greece the NGO fund is called “*We Are All Citizens*”; the project supporting shelters for vulnerable groups is named “*Stegi+*” etc.). Over time and through the communication efforts of the respective Programme Operators and Project Promoters, the programme and project names have become established brands, taking a ‘life of their own’. This can significantly reduce the effect of any effort to promote the umbrella brand of “EEA Grants / Norway Grants”.

When asked to comment on the branding, the **key opinion formers** taking part in the focus groups highlighted that the abbreviation “EEA” is hardly ever recognised. Additionally, the abbreviation itself differs in various languages (e.g. “EOG” in Polish, “EEE” in Portuguese). The possible confusion caused by plethora of actors involved in implementing the Grants in the beneficiary states was highlighted further: the key opinion formers also highlighted that adding a full sentence of explanation how the projects are being funded under a logo on each communication material, in addition to the logos of the Grants, the NFP and the Programme Operator (as it is customary in several beneficiary states) makes it very confusing to instantly identify the Donors or the correct source of funding. They suggested following the route of the Swiss financing mechanism and using the flags of the Donor states.

## Donor visibility

Regarding their efforts to ensure Donor visibility, the National Focal Points were unanimous that they referenced Donor countries in all communication material produced, as well making sure that Grants logos are present and visible in communication materials. For the Programme Operators and Project Promoters, the use of the logos appeared to be a preferred method to achieve Donor visibility as it was indicated the most often.

Figure 16: Ensuring Donor visibility



Open responses about the methods put in practice by the NFPs included special references being made of Donors to media representatives contacting the NFP and naming all of the donor states in written materials.

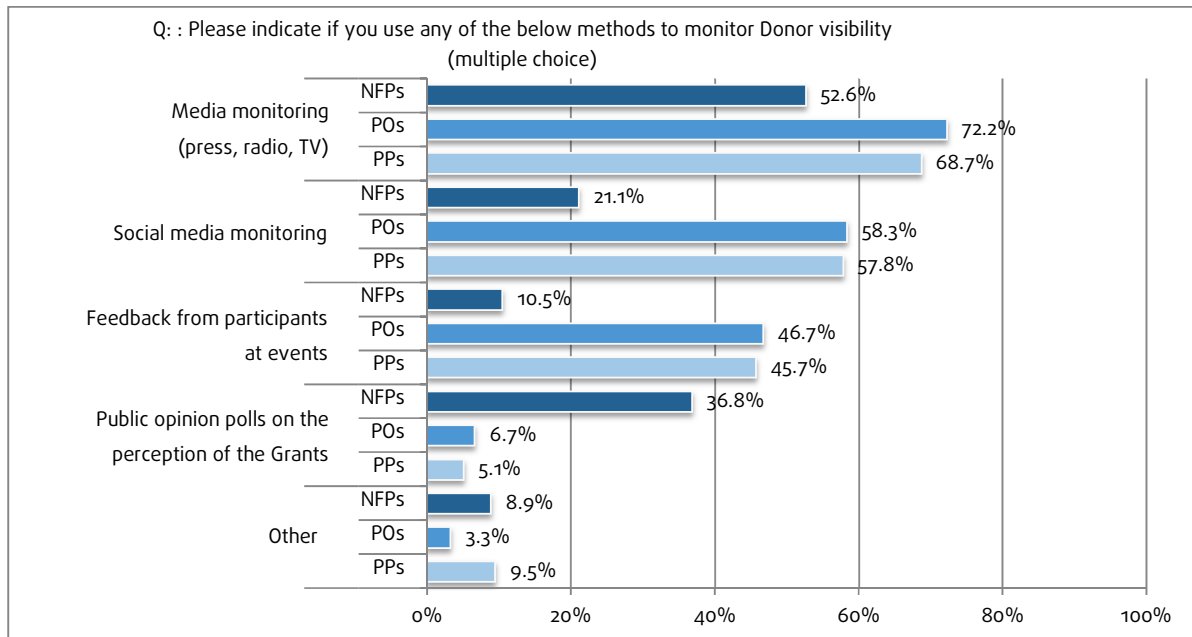
The Programme Operator and Project Promoters reported providing a full sentence explanation of the sources of funding on the websites and on written communication materials and other project deliverables, along the lines of *"this project implemented under a programme [Programme Area name] has been funded by Norway, Iceland and Liechtenstein under a programme to support [programme specific beneficiaries] in [county] under the Financial Mechanism of the European Economic Area for the years 2009-2014"*. However, as highlighted above, such extensive explanations can obscure the visibility of the Donors as they become 'white noise' for the recipients of the communication.

It can be assumed that not all three Donors receive the same level of visibility. If a country promotes the Grants predominantly using the name "Norwegian Mechanism" and includes the EEA Grants logo, the presence of Iceland and Liechtenstein can remain unnoticeable.

Regarding **monitoring the visibility of the Donors**, half of the NFPs indicated that they monitored Donor visibility on the media (traditional and social), and more than a third through public opinion polls on perceptions of the Donors (Bulgaria, Latvia, Lithuania, Poland, Romania, Slovakia,).

The Programme Operators, as well as Project Promoters, indicated that the channels which were most used for monitoring Donor visibility were traditional and social media and collecting feedback from participants at events; given the cost involved in running public opinion polls, it is unsurprising that few PO and PP survey participants reported conducting public polls on the perceptions of the Donors in their country.

Figure 17: Monitoring Donors' visibility



The interviewed representatives of **Norwegian Embassies** believed that in the communication efforts that they undertake jointly with the NFPs, the visibility of the Donor countries is always ensured, but stressed that it is highly likely that the audiences of their communications only retain the information about Norway being the Donor. They have all also agreed that among the general public in their respective countries the awareness of the Grants in general and the Donors in particular is very low or bordering on non-existing. In the cases of Bulgaria and Poland, the Embassies' representatives also believed that there is a certain degree of confusion with EU-funded programmes in the general public's minds, but less so in "professional circles" such as NGO networks or the public sector.

Additionally, the **key opinion formers** pondered whether it is in the Donors' interest to reveal their true motivations for having created the Grants (which they identified as gaining access to the EU's single market). The participating key opinion formers agreed that any communication on Donor's motivation should highlight that the Grants are in the name of certain values and standards.

### Perceptions of Donors among the public

Whilst the focus groups conducted within this study cannot be considered as offering statistically representative views for the entire populations, they allowed us to gauge perceptions on the Donor countries among the case-study beneficiary states. The table below offers a very succinct summary of the focus group findings with relation to the perceptions of the Donors, and the full focus groups analyses are included in the Annex.

Beneficiary state	Main findings from the focus groups with relation to Donor visibility:
Bulgaria	<ul style="list-style-type: none"> <li>As reflected in the name that is commonly used in Bulgaria to refer to the Grants (<i>"The Norwegian programme"</i>), Iceland and Liechtenstein were less likely to be associated with the programme by both the general public and the professionals dealing with the Grants;</li> <li>Most of the general public is reportedly unaware that Liechtenstein and Iceland support projects in Bulgaria.</li> </ul>

Lithuania	<ul style="list-style-type: none"> <li>■ <b>Norway</b> is particularly well-known, with Lithuanian society having a consistent image of Scandinavian countries as being rich and promoting democratic and humanitarian values; also hosting a sizable Lithuania diaspora. However, recent controversies over child custody rights of Lithuanian migrant workers in Norway have somewhat damaged the image of Norway;</li> <li>■ <b>Iceland</b> is mostly remembered for being the first to recognise Lithuania's independence and was mostly associated with its unique nature;</li> <li>■ <b>Liechtenstein</b> was reportedly not even considered when the project partners searched for partners, fearing language barrier and having no sources of knowledge.</li> </ul>
Poland	<ul style="list-style-type: none"> <li>■ <b>Norway</b> was associated with cold climate, considerable wealth stemming from oil extraction, and being very focused on sustainability, green energy and environmental protection, as well as promoting human rights. Additionally, the opinion prevailed that Norwegian public administration is very trusted by its citizens;</li> <li>■ <b>Iceland</b> brought the associations with ice, geysers, fair amount of Polish migrants, and that is had recently recovered from bankruptcy;</li> <li>■ <b>Liechtenstein</b> brought no connotations whatsoever.</li> </ul>
Portugal	<ul style="list-style-type: none"> <li>■ <b>Norway</b> and <b>Iceland</b> are seen as very modern and developed countries with strong economies and effective public financial control were the people enjoy high standards of life;</li> <li>■ The focus group participants did not have a positive perception of <b>Liechtenstein</b></li> </ul>
Slovakia	<ul style="list-style-type: none"> <li>■ Norway was perceived as one of the most advanced countries, which has also very competent governance structures and enjoys the trust in the state and the society;</li> <li>■ It was judged that ordinary people are mostly unaware of the other two Donor countries and that Iceland and Liechtenstein do not bring any concrete associations apart from liberal values.</li> </ul>

## Conclusion

As there are no specified targets nor mechanisms to measure changes to levels of awareness of the Grants and the Donors it is difficult to judge whether it has increased as a result of communication efforts of the engaged actors. At the same time, we note that the current channels and tools employed by NFPs, Programme Operators and Project Promoters are not sufficient to support an increase in general public awareness.

The greatest obstacle that the Grants have to face in terms of their perception and awareness is to combat the common confusion with EU Structural Funds, which has been confirmed by the stakeholders we consulted in countries. However, given the relatively small size of the Grants in comparison to EU support (e.g. in the years 2007-2013 Poland received 85,4 billion €), it would be unreasonable to expect great levels of recognition, particularly among the general public who have not directly benefited from the Grants. Yet given that the Grants offer support for the NGO sector, which the EU Structural Funding offers only to a very limited extent, focusing on raising awareness among this group may be an approach worth exploring further.

This leads to the need of defining who should be the target audience of communicating about the Grants: the general public or specific sectors such as universities, local government or NGOs. As outlined above, trying to compete with EU Structural Funds with reaching the general public is futile and it could be more advantageous to target specifically potential beneficiaries only, and count for the word of mouth to spread the message to other audiences.

With regards to visibility of the Donor states it became clear that the use of "EEA" abbreviation is the least understood, whilst using the names of the countries brings more recognition. Possible inclusion of national flags of the Donors might possibly bring even more recognition. Yet at the same time, the reasons behind

the Donors having created the Grants remains somewhat obscured. The consulted key opinion formers recognised the reason as a compensation for the access to the EU Single Market. There would, however, be scope to frame the message in a more positive, value-based way, e.g. highlighting that the Grants were created in a name of certain values and standards. This might bring greater level of recognition of the Donors and more positive associations than simply Norway = a rich land of snow and oil.

## Recommendations

- Include the requirement for sharing success stories 'up' in the Regulations (or the Annex)
- Consider creating a shared platform accessible by the actors at all levels (national, programme, project) for sharing success stories
- Provide training and / or clear guidance on developing success stories from project results
- Consider limiting the amount of information which needs to be presented on communication materials with relation to the source of funding. Listing the Donor Countries, the full name of the Programme Area, the full name of the Financial Mechanism and the years might be informative, but at the same time clouds the identification of the Donors and quickly becomes white noise to the general public.
- Consider replacing the "EEA" abbreviation with one that would be better understood by the general public and would remain unchanged in translation. Options can include various permutations of "ILN" (Iceland, Liechtenstein, Norway).



# 7 Processes

The following section focuses on the questions dealing with the processes behind the implementation of communication activities in the beneficiary states. This includes cooperation between actors at multiple levels of the Grant implementation, and the mechanisms and tools used by different actors for monitoring and evaluation of communication activities.

## 7.1 Cooperation on communication between different levels

### Question 11:

**How has the cooperation on communication worked between different actors (e.g. Donor State Embassies, National Focal Points, Programme Operators, Project Promoters and Donor Programme Partners)?**

To answer this question, we defined the level and type of cooperation on communication between different actors and their perceptions of the effectiveness of this cooperation.

#### Sources of evidence

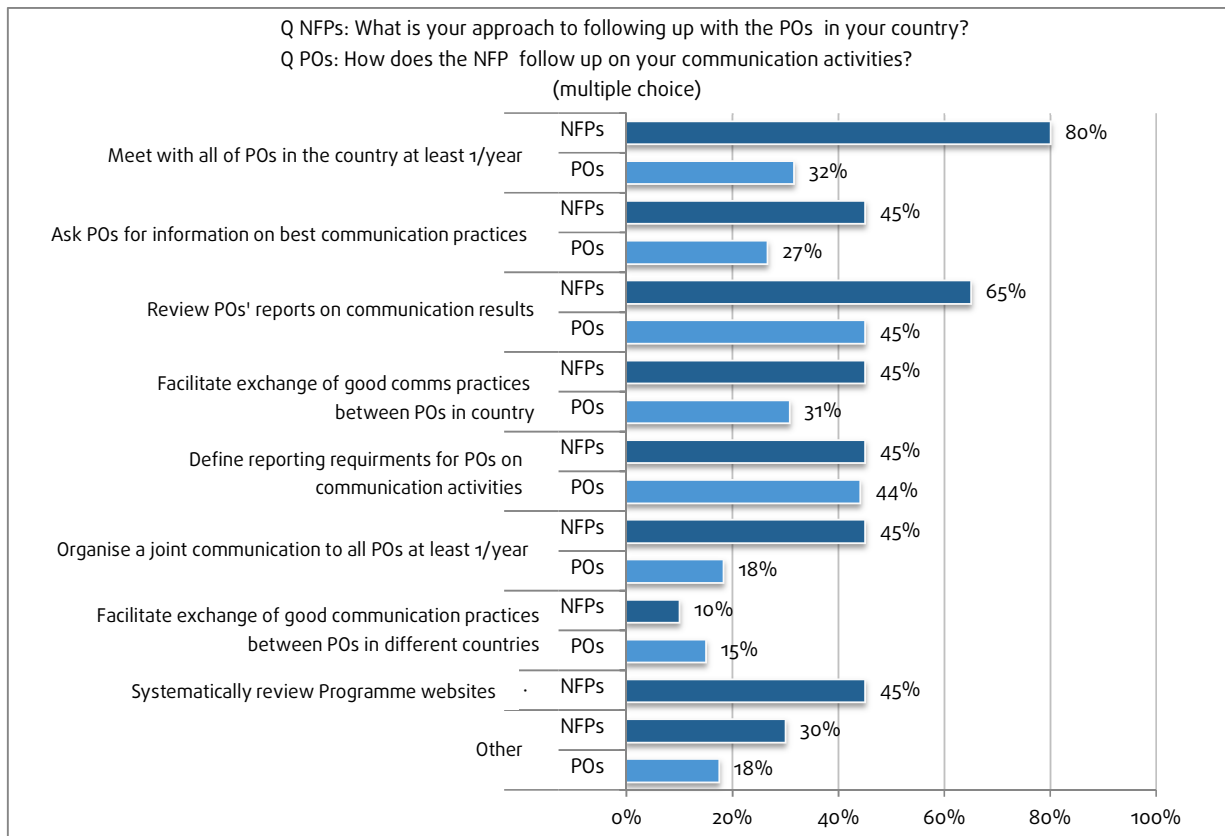
- Desk research
- Online questionnaire of NFPs
- Country case studies:
  - stakeholder interviews
  - PO and PP survey

### Level and type of cooperation between different actors

Annex 4 requires the National Focal Points to “ensure that Programme Operators fulfil their information and publicity obligations” and similarly requires the Programme Operators to ensure that the Project Promoters fulfil theirs. As such there is no description of how the follow-up is supposed to look in practice. In the Communication Strategies prepared by the National Focal Points, the means for following up with POs and PPs are **hardly ever described in operational terms**. Similarly, the assessment of the information and publicity activities implemented by the POs are consistently missing in the NFPs’ Strategic Reports, or is dealt with as part of the information provided on the status of implementation of the Communication Strategy.

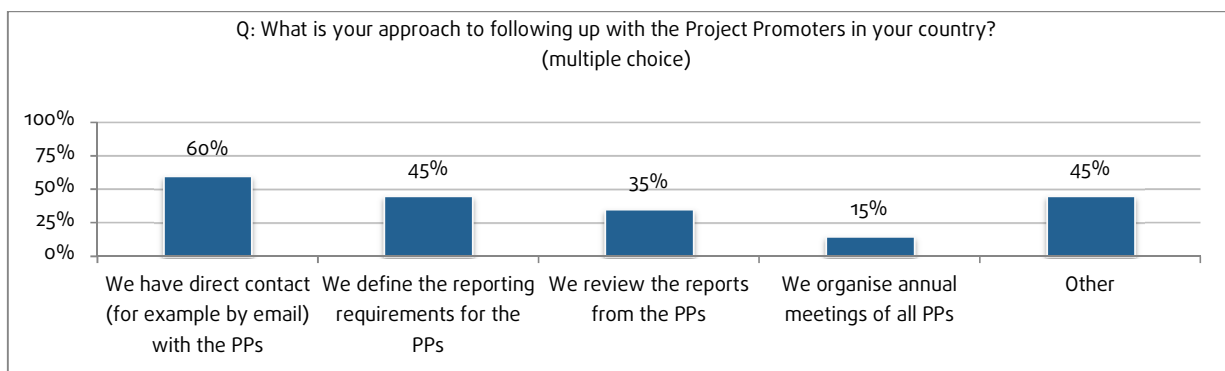
In the survey, most of the **National Focal Points** reported meeting with Programme Operators in their country at least on a yearly basis (with one respondent (Bulgaria) stating that this was done on a monthly basis. Also, more than a half of the NFPs reported asking the POs for information on best practices in communication (also on communicating the results of the Grants) and regularly reviewing the Programme Operators’ reports on communication results. As means of ‘other’ follow-up mechanisms, in certain countries the NFPs had organised a Communication Workshop for Programme Operators and Project Promoters (Portugal), or had reviewed their websites and social media activity at random occasions (Estonia). **The Programme Operators’** opinions on how they were followed-up with differed somewhat to what the NFPs reported. The POs mainly stated that the NFPs monitor their action by reviewing report on their communication results, as well as defining the reporting requirement for Programme Operators in relation to those activities. There was also a number of Programme Operators who stated that National Focal Points in their country meet POs at least once a year, that they facilitate the exchange of good communication practices amongst POs or regularly ask for examples of good communication. The participant Programme Operators reported to a lesser extent NFPs facilitating the exchange of best practices with POs in other beneficiary states, or that they organise a joint communication to all POs.

Figure 18: NFPs following-up on the POs' communication actions



Regarding **Project Promoters**, over half of the National Focal Points reported having direct contact with the PPs, and that many NFPs define the PPs' reporting requirements. In their open responses, several NFPs (Cyprus, Romania and Spain) stated that they visit as many projects as they can (monitoring visits) and attend all the activities and events the PPs organise.

Figure 19: NFPs following up with PPs

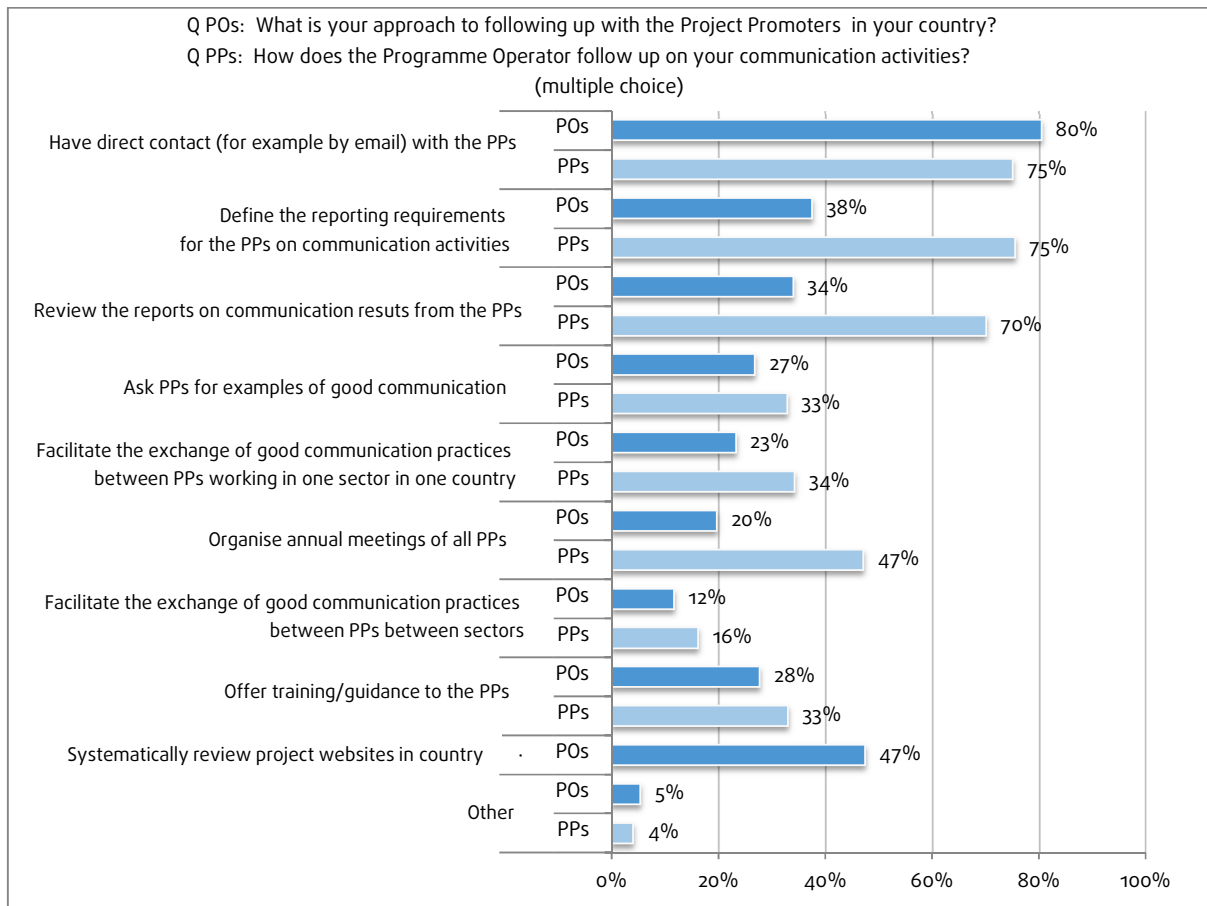


More than a third of all **Programme Operators** participating in the survey reported having direct contact with PPs as a main method of follow-up. The second most popular method was to systematically review project websites in their country. Fewer POs noted that they define the reporting requirements of POs on their communication activities or that they review the report son the communication results in their sector of

operation. Only one in ten of the surveyed POs stated they organise annual meetings of all PPs, and even less reported facilitating the exchange of good practices between PPs in their sector and those in others.

The surveyed **Project Promoters** agreed that the POs have direct contact with them and reported that their second main follow-up is by POs defining the reporting requirements and reviewing reports on communication results in their programme area. More than a third of the surveyed PPs mentioned that the POs in their countries meet with the PPs at least once a year. Few PPs stated that the POs in their regularly ask them for examples of good communications. Even smaller numbers of the surveyed PPs noted that the POs in their country act as facilitators in the exchange of good communication practices between PPs in their country and those in other Beneficiary States.

**Figure 20: POs following-up on the PPs’ communication actions**



At the same time, the PPs who participated in the focus groups felt strongly about the overwhelming bureaucratic requirements imposed on them by some of the Programme Operators originating from the public sector. They believed that the requirements imposed upon them by the PO were far more rigid and strict than originally named in the Regulations. They indicated that they would very much welcome the Financial Mechanism Office making it clear to the Programme Operators that introducing more restrictive communication requirements than foreseen in the Regulations is unwelcomed.

## Cooperation with the Donor States' Embassies

Similarly to the Donor Programme Partners, the Embassies role in communicating about the Grants is not mentioned explicitly in the Regulations. Despite this, their communication efforts cannot be underestimated. The Royal Norwegian Embassies seem to be particularly active promoting the Donor Countries (in this case - Norway) and bilateral relations. The Embassies most often conduct site visits to the projects, prepare articles and are highly active in electronic media such as websites and social media, as well as attend and (co-)organise events focused on the Grants. At the events and site visits, the presence of respective Ambassadors is the element with generates the most media interest. Furthermore, participation of Ambassadors makes the Donors less 'anonymous' and quite literally adds a human face to them. Inclusion of Embassies in communication efforts of other actors (e.g. National Focal Points) has the additional benefit of limiting the confusion of the Grants with EU-funded Structural Funds (see section 6.2 of this report - Donor visibility), again, by emphasising the name and the role of the Donors.

From the opinion of the **Embassies' representatives**, overall, the cooperation between the different actors involved in communicating about the Grants (National Focal Points, Donor Programme Partners, Embassies, Programme Operators, and Project Promoters) appeared to be largely problem-free. However, it seems unlikely that the Embassies have a very in-depth view of how collaboration works between the three categories of implementing actors.

When it comes to collaboration with Embassies, concrete examples of synergies resulting from the Embassy-NFP cooperation were cited, such as in Portugal where a national workshop was conducted in 2015, which was promoted by the Norwegian Embassy<sup>10</sup>. The workshop put together the Embassy, the PO, the PP and the NFP. The workshop was considered to be very effective as far as communication's best practices exchange is concerned. The Embassy in Bulgaria reported holding regular meetings with the NFP and even developed a joint newsletter with project stories as well as co-organising a 'matchmaking event' for potential beneficiaries (presented in detail as an example of best practice in section 5.2).

## Conclusion

Concrete descriptions of planned means of cooperation between the actors are consistently missing in the Communication Strategies and Communication Plans.

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 checking (by the NFP and Programme Operators) that communication obligations are carried out to supervise actors at lower levels of the hierarchical chain. The Annex does not support a sense of national team all striving to meet common aims to reduce socio-economic disparities and strengthen bilateral relations through synergies, sharing information and stories, so that successful projects can be easily identified and used to support awareness-raising.

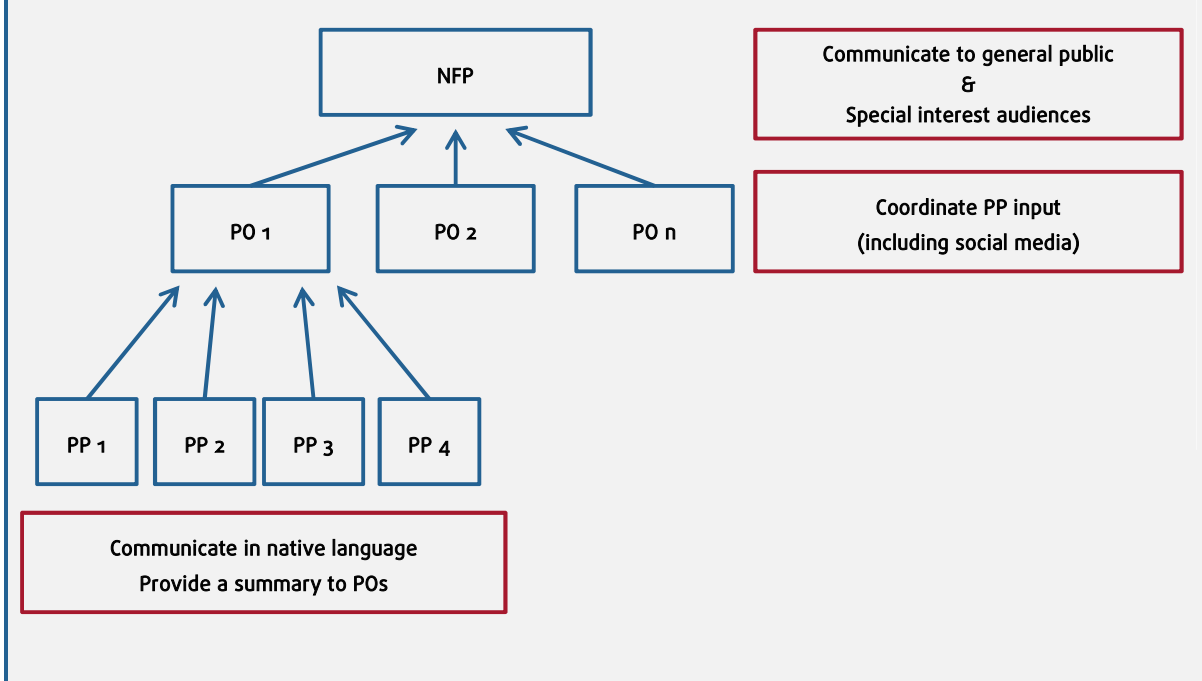
Similarly to the Donor Programme Partners, the Embassies' roles in communication are not mentioned in the Regulation. Given the often reported cases of successful cooperation between the Embassies and the National Focal Points, it might be worth exploring specifying the communication role the Embassies play.

<sup>10</sup> The workshop "EEA Grants Projects - Communicating Results" was organized by both the Portuguese National Focal Point and the Norwegian Embassy in Lisbon, in collaboration with the Ministry of Foreign Affairs of Norway and the Financial Mechanism Office (FMO). It was held in Lisbon in September 15 at the premises of the Ministry of Environment, Spatial Planning and Energy.

The formalised (or simply supported by legal regulations) coordination and cooperation on communication between the Embassy and the NFPs could benefit the communication efforts in general, and communication focused on highlighting the bilateral aspect in particular.

## Recommendations

- Refocus 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;
- Consider the following model of cooperation in communicating about the Grants:



## 7.2 Monitoring and evaluation of communication work

### Question 12:

Which beneficiary states have mechanisms in place to monitor and evaluate the effects of their communication work, and how do they do this?

To answer this question we attempted to gauge information regarding the monitoring indicators used in the beneficiary states. We identified best practices through the in-depth review of communication strategies and plans. We also explored this issue on all three levels (national, programme and project levels) through online surveys for National Focal Points, Programme Operators and Project Promoters about the methods they use to collect data on communication results.

#### Source of evidence

- Desk research
- Online questionnaire of NFPs
- Country case studies:
  - stakeholder interviews
  - PO and PP survey

All beneficiary states describe monitoring and evaluation mechanisms in their Communication Strategies, but have done that to varying degrees. In general, the insufficient links made with specific objectives weakened the effort to define targets and to identify indicators and data sources. However, our review of the Communication Strategies and Strategic Reports allowed us to identify the following **good practice examples**:

**Latvia:**

The description of monitoring and evaluation in the Communication Strategy is valuable as it defines evaluation indicators, the way that monitoring is integrated into the different implementation phases. The corresponding 2013 and 2014 Strategic reports provide information on the quantitative monitoring of the website and on social media analytics.

**Portugal**

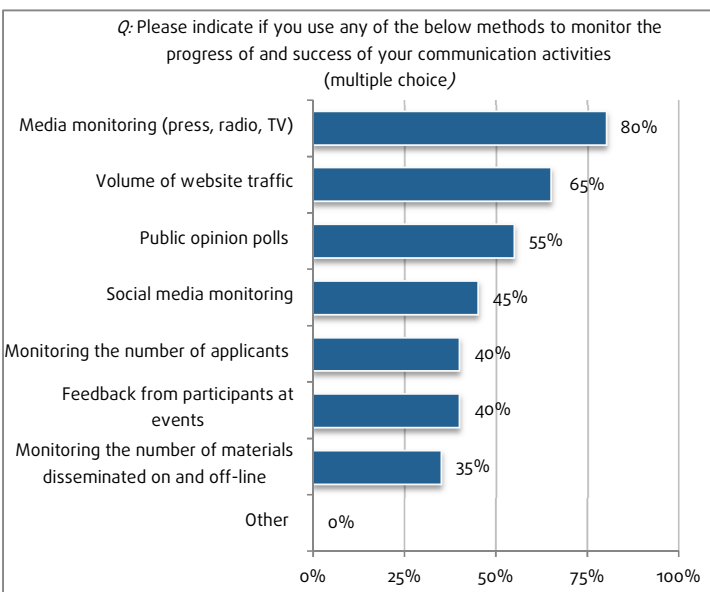
The strength of Portugal’s Communication Strategy is to detail the different types of awareness the information and publicity activities will contribute to by implementation phase. Consistent with this presentation, activities are also presented by implementation phase. The monitoring framework consists of a set of indicators, both quantitative and qualitative, for which targets are set and data sources identified.

**Slovakia**

The monitoring and evaluation framework included in Slovakia’s Communication Strategy sets out clear monitoring criteria, indicators and data collection methods. However, because the Strategy does not define targets within a specific timeframe, it would be more appropriate to talk about judgement criteria.

In the Communication Plans developed by Programme Operators, in general, the plans’ objectives remain at the level of general intent. In certain cases, a monitoring framework defines indicators and set specific targets – even in this case, the indicators and targets seem to focus on quantitative aspects only, which do not necessarily correspond to objectives leading to less tangible outputs. But the absent or insufficient logical link between the indicators and targets on one side and the objectives on the other side constitutes a weakness of the documents.

**Figure 21: Use of evaluation and monitoring methods by NFPs**

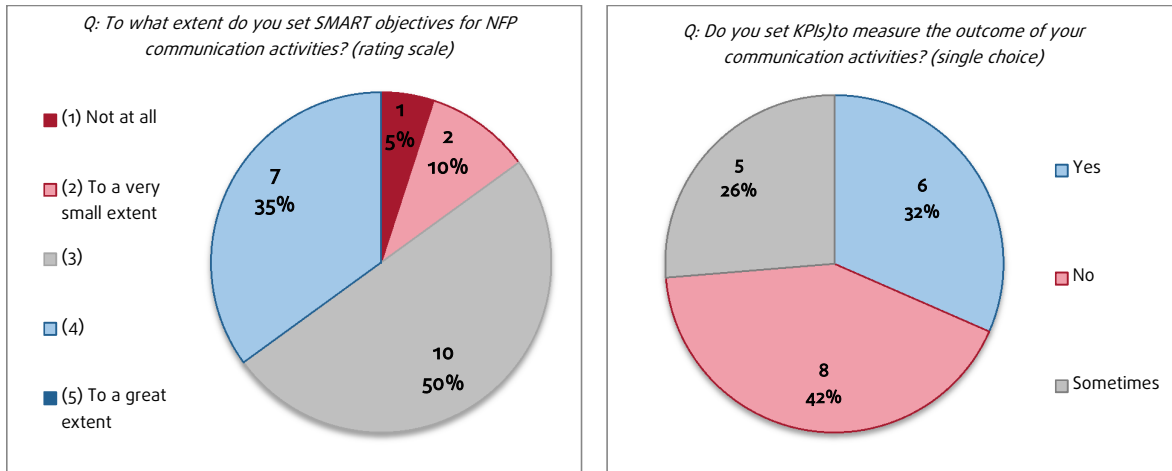


According to the survey, most **National Focal Points** monitored and evaluated their communication activities during the reviewed period, with one-third admitted to doing it “sometimes”. Only 9% (2 respondents) indicated that they did not monitor their communication activities at all. Of the NFP survey respondents who indicated that they do monitor and evaluate their communications, a majority (80%) reported doing so through media content analysis, including press, radio and TV. A significant number of NFPs also reported monitored the volumes of traffic on their websites or conducted public opinion polls. Social media bore less importance for the NFPs.

There was no indication from the responses with regards to whether there is a clear feedback loop whereby lessons learned from monitoring is used to improve communication activities.

In terms of setting **performance indicators**, 35% of surveyed NFPs reported having set SMART objectives to a significant for their communication activities. Half of the respondents noted that this had been done only to a certain extent and one NFP noted not having done it all. At the same time, the majority of the surveyed NFPs did not set Key Performance Indicators (KPIs) to measure the outcome of their communication activities.

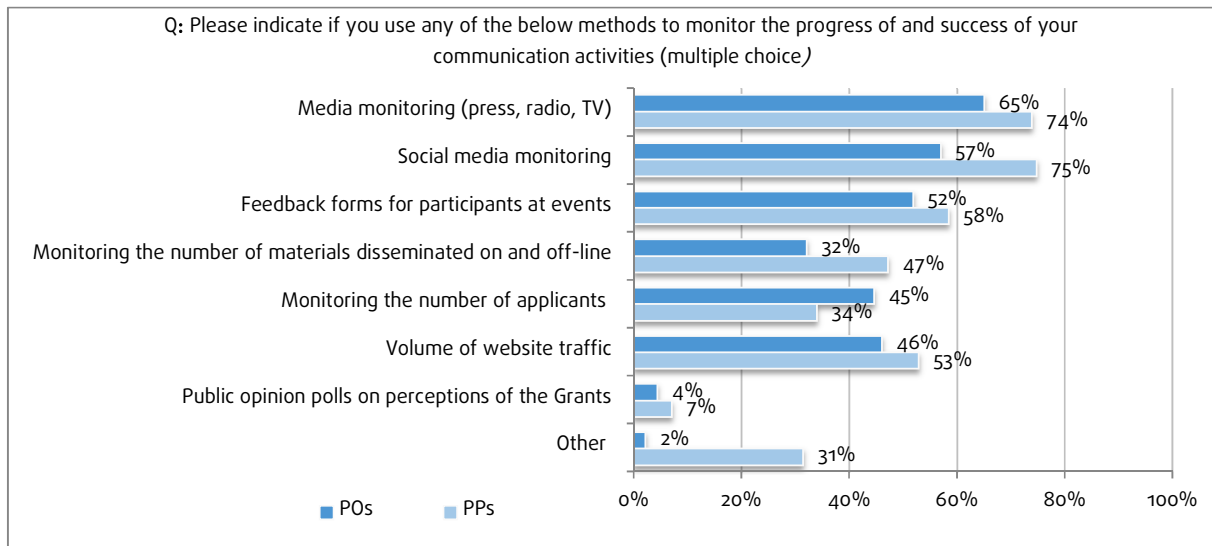
**Figure 22: Setting of SMART objectives and KPIs to measure outcome of communication activities**



The majority of **Programme Operators** participating in the survey reported that they monitor and evaluate their communication activities. Only 15 POs (3 Bulgarian, 1 Lithuanian, 7 Polish, 2 Portuguese and 2 Slovak) stated that they did not track their activities in any way. The methods used by the POs who reported that they monitor and evaluate their communication activities included mainstream media monitoring, tracking website traffic, social media monitoring and collecting feedback from participants at events were almost equally popular in the surveyed POs' responses. Unsurprisingly, given their size and budgets, the POs were least likely to conduct opinion polls on perceptions of the Grants.

More than a half of **Project Promoters** reported that they monitor and evaluate their communications activities. Close to a third of all survey participants stated that they monitored their activities only sometimes. Notably, 44 of the 187 Polish PPs participating in the survey stated that they do not perform any activities to this effect. Regarding the monitoring and evaluation methods used by the PPs to track the progress and success of their communication activities, half of the respondents to the surveys across the five case study countries reported using social and mainstream media monitoring, as well as keeping track of the volume of their websites' traffic.

Figure 23: POs' and PPs' use of evaluation and monitoring methods



## Conclusion

There have been baseline opinion polls on the perception of the Grants carried out in Czech Republic, Romania, Estonia, Hungary and Poland. The results of the ensuing second editions of the polls, which will take place after the countries completed the implementation of the projects can serve as a high-level monitoring tool for the effects of their communication work. However, a caveat must be applied that given the relatively small size of the Grants compared to the EU Structural Funding programmes, the effects of the communication work of the NFPs may not become as evident.

There is a lack of consistency of the monitoring and evaluation frameworks and which results the lack of consistency in the presentation of the information on outcomes and impacts provided across Member States. Whilst it may be important to track activities undertaken, it may be unrealistic to expect information and publicity measures to generate 'impacts' at project level and / or programme level.

It seems that setting SMART goals and KPIs are areas that NFPs find quite challenging. There are likely to be valid reasons for this as it can be difficult to set goals for measurable outputs and outcomes if there are insufficient mechanisms in place to collect this data, also it can be difficult to make choices on what and how to measure. This could be an area where more guidance could be helpful.

On programme and project level, the actors attempt to monitor social media and traditional media, as well as following the volume of traffic on their websites. However, the interviews with a sample Programme Operators revealed that monitoring is often an area in need of support.

When asked during in-depth interviews whether they would be interested in the FMO pre-defining a set of indicators that could be used to monitor the communication activities, some of the NFPs seemed reluctant, yet others admitted they would welcome suggestions of indicators as a means of guidance.

## Recommendations

- Review the current level of emphasis on monitoring and evaluation of communication activities on all three levels (national, programme and project) in the new Regulation;



- Offer a list of potential SMART goals, KPIs and indicators that may serve as ‘inspiration’ for the stakeholders designing their communication actions
- Strengthen the qualitative monitoring by gathering feedback on the activities to complement the quantitative indicators identified and contribute to the assessment of the impact and added-value of the information and publicity measures.
- Support the development of more consistent **national monitoring and evaluation frameworks** for communication activities across beneficiary states. This could, for example, 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.
- 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.



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