

Midterm assessment of communications in the 2014-2021 Financial Mechanisms

Final Report

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Abbreviations and Acronyms

ACF	Active Citizens Fund
BG	Bulgaria
CoE	Council of Europe
CY	Cyprus
CZ	Czech Republic
DG REGIO	Directorate-General for Regional and Urban Policy
DPP(s)	Donor Partner Programme(s)
dpp(s)	donor project partner(s)
EC	European Commission
EU	European Union
EE	Estonia
EEA	European Economic Area
EFTA	European Free Trade Association
EQ(s)	Evaluation Question(s)
EQM	Evaluation Questions Matrix
EL	Greece
EU	European Union
FMO	Financial Mechanism Office
FMC	Financial Monitoring Committee
FO(s)	Fund Operator(s)
FPI	Service for Foreign Policy Instruments
FRA	EU Fundamental Rights Agency
HR	Croatia
HU	Hungary
IPO(s)	International Partner Organisation(s)
KPI(s)	Key Performance Indicator(s)
LT	Lithuania
LV	Latvia
MoU	Memorandum of Understanding
MT	Malta
NFP(s)	National Focal Point(s)
OECD	Organisation for Economic Co-operation and Development
PL	Poland
PO(s)	Programme Operator(s)
PP(s)	project promoter(s)
PT	Portugal
RO	Romania
SMART	Specific, Measurable, Achievable, Relevant and Time-bound.
SWOT	Strengths, Weaknesses, Opportunities and Threats
UNDP	United Nations Development Programme
WB	World Bank

Executive summary

Introduction

This report presents the results of the 'Midterm Assessment of Communication in the 2014-2021 Financial Mechanisms', a study commissioned by the Financial Mechanism Office (FMO). Evidence for this study came from a desk review, stakeholder surveys, five country case studies¹, which included interviews with key communication stakeholders, and a benchmarking exercise comparing the FMO communication set up with three international entities². Key findings were also discussed in a validation workshop with the FMO.

This report presents the study findings, answers to the eighteen evaluation questions listed in the Terms of Reference, as well as conclusions and recommendations to refine future communication about the EEA and Norway Grants.

Key findings

Relevance of communication requirements

The study suggests that the current provisions of Annex 3 to the Regulations³ generally respond to stakeholders' needs. They provide clear instructions as to the overarching aims of communication, as well as definitions of communication roles and requirements by the stakeholders, in particular from the Beneficiary States. Stakeholders find the communication requirements provided in Annex 3 to be helpful rather than burdensome. Having a list of requirements is useful, as it supports the development of communication strategies and plans and helps stakeholders to structure their activities.

However, the evidence suggests that there is scope to bring Annex 3 up to date in the next Financial Mechanism. Relevant updates relate in particular to social media and digital communication, which came to the fore as communication moved online, due to the Covid pandemic. The need for updates is also supported by feedback from National Focal Points (NFPs) who see scope for more detail in the requirements, which would make it easier for them to reinforce the requirements in their country.

The FMO's mandatory approach to the requirements listed in Annex 3, which is supported by a guidance manual, appears to work quite well. However the benchmarking exercise prompted some discussion about the pros and cons of a mandatory approach to communication requirements.

Effectiveness of the communication requirements

With regards to the implementation of communication requirements, all communication strategies comply with the key requirements. Regarding communication plans, Portugal, Slovenia, Poland, Slovakia, and Lithuania meet almost all requirements. Portugal stands out as exceeding the basic requirements. All Beneficiary States have a dedicated website for the EEA and Norway Grants, both in English and in the national language. These websites meet the key requirements listed in Annex 3.

The main trend in communication practices across all programmes and countries was defined by the Covid pandemic. Offline or face-to-face communication activities were moved online. While social media and other online communication became more important. Although the study suggests that most organisations managed to transition smoothly, some potentially valuable communication activities had to be cancelled or became less effective.

NFPs and Programme Operators (POs) confirmed that they prioritise social media, but it is unclear this means in practice. The findings suggest that there is a need for greater support on the use of social media at all levels.

Also, this review has found that many NFPs and POs are unable to benefit from the expertise, social media, and other channels and tools available to national ministerial communication teams because EEA and Norway Grants communication is managed separately.

¹ The case study countries were Latvia, Poland, Portugal, Romania and Slovakia.

² The Work Bank, the European Commission's Directorate-General for Regional and Urban Policy (DG REGIO) and the Service for Foreign Policy Instruments (FPI).

³ Regulation on the implementation of the European Economic Area (EEA) Financial Mechanism 2014-2021 and the Regulation on the implementation of the Norwegian Financial Mechanism 2014-2021.

Communication processes, use of resources and comparability

The Beneficiary States have established processes that guarantee the implementation of their communication strategies and plans. However, the study identified some limitations of these structures that can affect efficient and effective implementation of communication activities. Stakeholders at country and programme level allocate 1-3 staff members to communication activities. Project Promoters (PPs) do not typically have specific staff allocated to communication. About four in ten staff members dealing with communication do not have a previous communication background. This lack of specific expertise influences the effectiveness of communication activities.

The study confirms that workshops and training organised by the FMO are useful and needed, but they mainly reach stakeholders at national level (the NFPs). However, it appears that insights and lessons learned at NFP level do not trickle down to Fund Operators (FOs), POs and PPs. Currently, POs and FOs are not offered many training opportunities or other support from the NFPs. And PPs are not offered many training opportunities by POs.

The study suggests that the FMO's role in facilitating communication about Grants in Donor States is limited, as its mandate is focused on coordinating communication towards audiences in Beneficiary States, as well as communicating with international audiences.

The study did not identify any significant issues in cooperation among different actors involved in the Grants but identified some areas where improvements or strengthening of cooperation is possible. These include the potential for increased cooperation between some NFPs and Donor State embassies. Although NFPs seem to work closely with POs, there is also room for NFPs to provide more support to PO communicators. There are also some specific minor issues that could be addressed in a sample of countries. Also, the benchmarking and case studies highlight some possible options for improvement.

The study identified that FO and PP communication about the topics supported by the Active Citizens Fund (ACF) can create negative unintended effects, which can be challenging for stakeholders to manage. Any negative consequences of ACF-related communication are not a consequence of a poor or ill thought-through communication strategy, but instead reflect the challenges of the political climate in these countries. However, stakeholders faced with such challenges would benefit from the FMO, NFP and/or Donors being more active in supporting them in specific critical situations and in providing of guidelines for how to handle negative publicity.

Conclusions

Overall, the communication requirements included in the Regulations (Annex 3) are helpful for stakeholders and are not considered to be too burdensome. However, there are number of aspects that could be reinforced, to bring Annex 3 up-to-date:

1. the current requirements for baseline research are not sufficiently targeted to be effective
2. there is no requirement to prepare target group analysis prior to development of communication strategies
3. there is no requirement for all communication strategies and plans to include "SMART" communication objectives
4. the requirement related to monitoring and evaluation of communication activities is not sufficiently comprehensive, with NFPs, POs and FOs not currently required to define indicators and/or set targets
5. the importance of online communication and social media needs to be reinforced

Analysis of communication strategies prepared by the NFPs confirms that, in nearly all cases, reporting on communications in country is focused on generating outputs (number of activities, videos, photos posted, publications and press releases, numbers of participants) rather than on generating communication outcomes, using creative approaches to increase awareness and understanding of results and/or the benefits of the Grants and engagement with Donors. There is a need for greater standardisation with regards to the specific headings and types of content to be included in communication strategies, even if these are tailored to a national context.

National level communication strategies are defined for a seven-year period. Such a long timeframe is not in-line with standard communication practice. A shorter timeframe is much more appropriate for targeted communication. Also, there is no mechanism to update objectives and/or confirm whether or not a shift in focus is required.

The implementation of the communication budget for Grants' communications at national level is highly fragmented, given the number of different actors and communication activities involved. There is scope to consolidate activities and, on an occasional basis, to generate a bigger communication push by aligning different actors around a common set of messages or activities.

The FMO lacks clarity on how resources are allocated at country level. Communication plans and reports should be required to provide an approximate allocation of funding to different communication activities and to link this to intended results.

The FMO's communication strategy is an important document that provides an overarching framework for all communication about the Grants. However, there is scope for further refinement, as the strategy⁴ does not currently include:

1. analysis of communication issues faced or insights into target group expectations, to support choices on messaging
2. SMART communication objectives and how these link to target audiences
3. KPIs for communication / raising levels of awareness, and/or by channel
4. information about how the FMO's communication performance will be measured

We acknowledge that some of these may be covered by the FMO's Work Plan and associated Communication Activity Plan, which are presented to the Donors yearly. However it is a recognised practice for communication strategies to include these elements to describe the whole approach and support year-to-year performance assessment.

The current communication goal and target groups for the FMO's communications have been defined, in close cooperation with the Donors, as raising awareness among:

1. Potential Project Promoters and project partners
2. The EU institutions and relevant Brussels-based actors
3. Relevant EU-affairs journalists in Brussels

Given the FMO's mandate and the limitations of its communication budget, it is not possible to achieve a big increase in raised awareness across all of the above groups. However, if the FMO were to identify the specific objectives and targets for these groups, it would be easier to define which groups and sub-groups to prioritise at which point. Also, this would provide increased clarity regarding the responsibilities of other stakeholders, who must be relied to support the bulk of awareness raising in Beneficiary and Donor States.

The study confirms that stakeholders managing ACF communication activities need more guidance and support in managing risks relating to communication on controversial topics and principles.

Recommendations

Communication requirements

1. **We recommend** updating and reinforcing the FMO's guidance documents to provide more concrete guidance on how to implement effective communication. The following elements should be considered:
 - a. Developing an online guide allowing users to click through to the elements of most interest. The following topics should be included:
 - i. preparation of communication strategies and plans
 - ii. preparing Grants' websites
 - iii. communicating on social media
 - iv. using logos
 - v. organising online events
 - vi. measuring the effects of communication activities
 - b. Including and sharing best practices identified in this or the previous funding period in the Beneficiary States.

⁴ The bulk of this study was carried out before the FMO's Communication Strategy was adopted.

2. **We recommend, in terms of social media**, that:
 - a. NFPs are requested to create Grants-specific social media accounts (and actively use them) on selected key platforms relevant to their target audiences. The current practice is that most social media communication is done by the NFPs using the general ministerial accounts.
 - b. POs and PPs are not required to create specific accounts for the programmes, but rather actively use their generic accounts to publish Grants-related content and use these accounts to amplify NFP posts.
 - c. The FMO continues to support NFP social media efforts by facilitating further social-media specific workshops about best practices in social media, including the key characteristics of each channel and how to maximise its potential, as well as ideas for ways to generate creative posts.
 - d. The FMO continues to encourage NFPs to share or translate specific FMO's posts or use Grants-specific hashtags.
3. **We recommend** that the FMO further encourages the NFPs to strengthen exchanges between the NFP and PO communication staff creating 'national communication networks' of communication professionals led by NFPs. The Donor embassies could also be invited to join actively or as observers. Currently, the FMO offers communication support to the NFPs, but this does not seem to be consistently shared with other communicators at PO and PP level. Creating a formal structure (i.e. a national network which meets regularly) could facilitate cooperation.
4. **We recommend** that the FMO and NFPs adopt a flexible approach to applying communication requirements to PPs. In some cases, projects are not relevant to fully-fledged external communication, which could even create issues for grantees (e.g., signalling the location of shelters for victims of domestic violence/human trafficking).

Communication performance

5. To increase the communication impact of communication stakeholders in the Beneficiary and Donor States, we recommend a stronger focus on *promotional communications* to complement the already successful *information provision* on Grants. More specifically, **we recommend** that the FMO requires:
 - a. NFPs to conduct target group analysis to support a prioritisation of target groups, and the identification of target group needs' that will feed into communication objectives and key messages per group
 - b. SMART communication objectives to be set at national and programme level;
 - c. national communication strategies to cover a shorter timeframe (e.g., 3 years) and/or to update the national plan at least once on the basis of research confirming how far objectives have been achieved
 - d. communication strategies and plans to include targets for reach and some form of engagement by channel and tool, as well as definitions of the types of monitoring data to be collected and collection methods
6. **We recommend** that the FMO encourages national and programme-level stakeholders to focus on how to increase the reach and engagement of their activities, including the use of paid promotion and campaigns, with specific objectives to address specific communication problems. To do this, there is a need for research to clearly define what the current problems are.
7. **We recommend** several changes related to monitoring and evaluation, including that the FMO develops an evaluation and monitoring framework for stakeholders' communication activities. National and programme level stakeholders should be required to set targets for outputs and outcomes by channel and tool (based on the previous year's performance) and aim to improve this performance year-on-year. They should also be required to define a small set of overarching outcome/impact indicators to be measured on a regular basis.
8. **We recommend** that a target is set at national level to confirm the combined impact of communication activities. This should be done by collecting evidence, for example via a survey to ascertain awareness, understanding and attitudes within the target group at the start of the Communication Strategy timeframe and then again at the end of the timeframe. **We recommend** that the evaluation framework used in the Beneficiary States is aligned with methods of evaluating the FMO's own communication performance, so that it supports an overall assessment for a specific time period.

Support to stakeholders

9. **We recommend** that the FMO continues to support NFPs with training and workshops, but also reinforces the NFPs' role in sharing lessons learned with POs. **We recommend** that the FMO provides guidelines for NFPs on how to support stakeholders in their countries, by:
- a. Continuing to provide training and workshops for POs. Consideration could be given to engaging external experts to support training at national level, as well as train-the-trainer approaches, where stakeholders at each level train the next level down (FMO, NFP, PO, PP). Important topics, include setting SMART objectives, using social media, developing monitoring frameworks and working with communication agencies.
 - b. Translating key elements of the Communication and Design Manual (or expanded guiding documents as suggested above) into local languages for use by POs, FOs and PPs.
 - c. Identifying opportunities to increase collaboration to support joint activities involving the NFP, POs (and potentially also with the Donor embassies), for example a calendar of key and possible joint events, expectations for re-posting social media posts, and implementing joint thematic campaigns.
10. **We recommend** that the FMO provides a template for communication strategies and plans (a Word document to be used to draft these), in addition to guidance in the Manual. The template should include instructions related to setting SMART objectives by target group. It should include a table where stakeholders indicate the relevant communication objective, the communication activity, the audience, the timeframe and the budget, as well as a target output and outcome. Similar templates should be available for annual reporting; such as the Annual Programme Report and the Strategic Report in particular, to report the key performance indicators. These documents should maintain the balance between required structured data and creative aspects of communication which will differ from country to country and from programme to programme.
11. **We recommend** that the FMO creates a webpage within the FMO website for all communication materials for stakeholders. These documents are currently stored on a 'resources' subpage⁵, which includes contractual and programming documents. Consideration could also be given to using this page to encourage stakeholders to communicate effectively. The communication subpage would include:
- a. the FMO communication strategy and national communication strategies
 - b. guidance documents, including on using social media
 - c. success story project examples and templates to encourage PPs to prepare their stories
 - d. photos, and visuals, etc.
 - e. materials for reuse (templates, logos, online events backgrounds, roll-up templates)
- If it is not possible to create a new subpage within the current website structure, it would be useful to at least refine the filter on the resources page to allow users to filter all 'communication' resources.
12. **We recommend** using a multi-site tool to establish a Grants website network, with the FMO's website design and layout being replicated by national Grants websites⁶. Such a 'multisite' would make it easier to ensure consistent high quality in the Grant's online presentation and support raising the profile of the Grants as distinct from EU funds. In addition, this approach will provide comparable website analytics, to facilitate better understanding of user experiences and engagement.
13. **We recommend** that the FMO and the Donors define a risk communications procedure so that ACF FOs have a clear procedure to follow if they receive a negative backlash i.e. in relation to LGBT rights, gender equality, integration of migrants, etc.

⁵ <https://eeagrants.org/resources>

⁶ Such as WordPress multisite solution. Multisite is a type of WordPress installation that allows creating and managing a network of multiple websites from a single dashboard.

FMO's Communication strategy and activity

14. **We recommend** that the FMO refines its communication strategy to include SMART communication objectives linked to specific target groups, and that it reconsiders whether potential grantees should be an FMOs priority target group. In addition, it is recommended that the FMO sets a small number of KPIs for FMO communication performance and defines which measures will be used to assess these KPIs.
15. **We recommend** that the national and programme level stakeholders develop national versions of FMO-led communication campaigns, with the aim of generating (national) media coverage. Currently, FMO campaigns, such as #CivilSocietyStartsHere or #EEAChdropcounts, are shared with NFPs and FOs who translate and share the FMO's materials for example via social media. However, going forward we recommend that NFPs and FOs use the FMO defined themes to create their own high impact, multi-channel campaigns at national level, with the exact timing of these national campaigns tailored to generate maximum impact within a specific Beneficiary State. The FMO can keep a coordinating role, providing the design, key messages (to be translated) and general coordination of effort. The NFPs (and/or POs or FOs if relevant) should be invited to co-create the campaigns, in particular to propose a set of activities to be carried out in their country. Country campaigns can be implemented in all or a sample of Beneficiary States.
16. Although we acknowledge the importance of EEA abbreviation, **we recommend** not to use this abbreviation in external communication towards the Beneficiary States. The available polling data on current levels of recognition and understanding of "EEA" in the Beneficiary States was patchy. Yet anecdotal evidence suggests that there is a general lack of understanding of this abbreviation and its variable formulation in local languages in the Beneficiary States (for instance, according to 2018 baseline study in Portugal, only 2.7% of respondents could associate the EEA abbreviation with Norway, 2.5% with Iceland and 2% with Liechtenstein). We acknowledge that the use of the abbreviation should be carefully considered, and we therefore propose a two stage approach:
 - a. **we recommend** carrying out a brand recognition survey, focusing particularly on the recognition of the EEA abbreviation in a sample of Beneficiary States. If the study confirms the lack of awareness of the abbreviation, then:
 - b. **we recommend** eliminating the abbreviation from external communication, mainly from social media. As a result of the change of the Grants logo, the abbreviation was quite successfully removed from the Grants' website. Further progress could be made, if the abbreviation was removed from the names of social media channels. 'EEA and Norway Grants' could be replaced by:
 - i. Iceland, Liechtenstein and Norway Grants / Norway Grants (reflecting the approach used in the logo, but this option is also the longest)
 - ii. Iceland, Liechtenstein and Norway Grants (a shorter version with alphabetic order of the Donors, in line with the logo)

1. Introduction

This report is the Final Report within the '**Midterm Assessment of communication in the 2014-2021 Financial Mechanisms**', a study commissioned by the Financial Mechanism Office (FMO).

The purpose of this Report is to present the answers to the Evaluation Questions (EQs) listed in the Terms of Reference under the Framework Agreement 'Appraisal, Monitoring and Rapid Assessment Services relating to EEA and Norway Grants 2009-14 and 2014-21', as well as our conclusions and recommendations for the future communication within the EEA and Norway Grants.

This report is based on the findings from the following research activities carried out as part of the study, namely:

- **A desk review** of documents provided by the FMO
- Three **surveys** with
 - stakeholders in the Beneficiary States: National Focal Points (NFPs), Programme Operators (POs) and Fund Operators (FOs)
 - stakeholders in the Donor States, i.e., Donor Programme Partners (DPPs)
 - direct grantees at project level in the Beneficiary States, i.e., Project Promoters (PPs) and in the Donor States, i.e., Donor project partners
- **Case studies** in five Beneficiary States which included interviews with key stakeholders engaged in a sample of Programmes in:
 - Latvia
 - Poland
 - Portugal
 - Romania
 - Slovakia
- **Interviews** with key personnel in the FMO, representatives of the three Ministries of Foreign Affairs of the Donor States and the three International Partner Organisations (IPOs):
 - The Organisation for Economic Co-operation and Development (OECD)
 - EU Fundamental Rights Agency
 - Council of Europe (CoE)
- **A benchmarking exercise** comparing the FMO communication set up with three international entities:
 - Work Bank (WB)
 - European Commission's Directorate-General for Regional and Urban Policy (DG REGIO)
 - Service for Foreign Policy Instruments of the European Commission (FPI)
- **A validation workshop** between the study team and the FMO to discuss preliminary conclusions from the study.

Chapter 2 of this report presents the **conclusions and recommendations** from the study and Chapter 3 presents the **answers to the evaluation questions** and related **study findings**. The last chapter, Chapter 4, describes the **methodology** of the study, presenting the research tools in more detail.

2. Conclusions and recommendations

Conclusions

Communication requirements for stakeholders

1. **Overall, the communication requirements included in the Regulations (Annex 3) are helpful for stakeholders and are not considered to be too burdensome.** Stakeholders have developed and embedded a communication approach, which is grounded in clear expectations from the FMO. Stakeholders are largely meeting the requirements, with some minor exceptions.
2. **The FMO's approach to the requirements (Annex 3) supported by a guidance manual appears to work quite well.** In this context, Annex 3 appears to provide the certainty that some stakeholders need as a framework for what is expected, particularly in a context where teams sit within a wider organisation, which has other communication priorities.
3. **The current requirements for baseline research carried out by the NFPs are not sufficiently targeted to be effective.** The baseline research is focused on awareness of the Grants, but it does not investigate information needs' of target groups, to allow tailoring messages and information to the needs. Also, the timeframe for conducting the baseline is very long and not connected to specific communication efforts. Whilst developing a Strengths, Weaknesses, Opportunities and Threats (SWOT) analysis provides insights, this does not appear to be linked to evaluation activities and developing one SWOT analysis over a six-year timeframe is unlikely to provide meaningful information.
4. **There is no requirement to conduct a stakeholder analysis to prepare communication strategies, which goes against established good practice.** Communication goals should be developed from an understanding of target groups. Stakeholder analysis allows a better understanding and prioritisation of target groups. It should be used to define which objectives should be tailored to which target groups, as well as the channels and tools that should be used to reach these groups.
5. **A key weakness of Annex 3 is that it does not require all communication strategies and plans to include SMART communication objectives,** even if these are recommended in the FMO's Design Manual. The need for SMART communication objectives is so critical that they should be included as a mandatory requirement, providing clear direction for all communication activities.
6. **The requirement related to monitoring and evaluation of communication activities by the NFPs is not sufficiently comprehensive to ensure consistent and effective monitoring and evaluation.** In consequence, it is not possible to analyse strengths and weaknesses, track year-on-year progress and compare countries. Currently, evaluation of communication strategies and plans is required, but the instruction is insufficient to ensure that evaluation and monitoring efforts are useful and meaningful. There are no supplementary guidelines on how to set up monitoring systems and what type of quantitative and qualitative data to collect (for example awareness, increased understanding, positive attitudes, donor satisfaction, etc.).
7. **Linked to the above, there is no requirement in Annex 3 for stakeholders to define indicators and/or set targets.** Whilst it is understood that the FMO is concerned about putting too many onerous requirements on stakeholders, stakeholders need to collect evidence to allow the FMO and stakeholders themselves to have better oversight of communication results.
8. **The need to update Annex 3 also relates to the importance of online communication** and the increased importance of social media. The Covid pandemic reinforced Grants' online communication at national and local level, but Annex 3 seems to place a heavy focus on an information-focused approach rather than a communication and engagement-focused approach. There is more focus on website provision than on generating engagement via social media, for instance.
9. **The requirement of running a number of events of a specific size is too prescriptive and not driven by an assessment of the best approach to generate communication outcomes for a specific target group.** Events can be very useful and bringing people together on a face-to-face basis is quite usual in grants'

communication by other Donors. Yet, NFPs and POs should explain the rationale for the use of events in their strategies and plans, considering other opportunities to generate extensive target group reach and engagement. Also, the choices of communication tools should relate to target groups and specific objectives, as well as available budgets.

Communication performance

10. **At national and programme level, communication strategies and plans do not tend to define SMART objectives for communication activities.** A lack of SMART objectives means that activities are not focused on a measurable target, which means that it is not possible to assess communication results. National communication strategies tend to describe operational goals rather than SMART communication objectives and some do not seem to set any communication objectives at all instead quoting the FMO's broad objectives. For examples:
 - i. *"To achieve good coordination with the Programme Operators"*
 - ii. *"To facilitate and promote bilateral relations between the Donors and the Beneficiary States"*
11. **An analysis of communication strategies confirms that, in nearly all cases, country-level communication is focused on generating outputs** (number of activities, videos, photos posted, publications and press releases, numbers of participants) **rather than on generating communication outcomes** using creative approaches to increase awareness and understanding of results and/or the benefits of the Grants and engagement with Donors. If the FMO wants to increase the effectiveness of country-level communication, there needs to be an increase in the focus on outcomes.
12. **There is a need to reconsider the timeframe of communication strategies at all levels (FMO and national) as 7 years is too long for a targeted communication strategy. Also, there is no mechanism to update objectives and/or confirm whether or not a shift in focus is required.** Usual practice is to supplement this type of strategy with a more focused annual action plan and or to review progress in the short to medium term to assess if the strategy is working or not, for example at a mid-point. Currently, national communication strategies provide a very general direction of travel, by the 7-year format is not sufficiently targeted to ensure an effective national approach.
13. **The implementation of the communication budget for Grants' communications at national level is highly fragmented.** High impact communication comes at a cost and splitting the budget across lots of different activities is likely to limit the types of outcomes that can be achieved. This is not to say that activities have not been well run and/or are not appreciated by participants, but more pooling of resources, even on an occasional basis, would allow for a greater communications push to raise awareness with activities that might generate greater levels of reach engagement. Greater collaboration and synergies would help communication funds to go further given that high impact communication is costly.
14. **There is a need for greater standardisation with regards to the content of communication strategies;** some include information on budget allocation, some provide benchmarks and targets by channel and tool, and some include details on the approach to evaluation. But the approach is not currently consistent following a set template and this makes it hard for the FMO to have a good overview of what is planned and executed.
15. **Communication strategies, plans, and reports should be required to provide an approximate allocation of funding to different communication activities and/or to link this to intended results.** This implies that it is not possible to have an overview of the relative merits of different activity types and/or whether to invest more or less in specific activities. The effectiveness and efficiency of communication activities relates directly to the availability of human and financial resources and decisions concerning their allocation.
16. **There is scope for more guidance from the FMO on how to manage risks relating to communication on topics and principles of the Active Citizens Fund,** which are controversial in some countries. Managing negative media coverage can be difficult for some FOs and PPs even if these topics can strengthen the image of the Grants for some social groups.

FMO Communication strategy

17. **There is scope to further refine the FMO's newly adopted Communication Strategy⁷.** The FMO's Communication Strategy is an important document, which provides an overarching framework for all communication about the Grants. The strategy confirms the overarching goals of the Grants, i.e. reducing economic and social disparities in Europe and strengthening bilateral cooperation between the Donor and Beneficiary States. The document also confirms the different communication roles and responsibilities at each level (FMO, national, programme and projects) and the communication objectives. However, the Strategy does not currently include:

- Analysis of communication issues faced / insights into target group expectations⁸, to support choices on messaging
- SMART communication objectives and how these link to target audiences
- KPIs for communication / raising levels of awareness of the Grants, and/or by channel
- Information about how the FMO's communication performance will be measured

We acknowledge that some of these may be covered by the FMO Work Plan and associated Communication Activity Plan, which are presented to the Donors yearly. However it is a recognised practice for communication strategies to include these elements to describe the whole approach and support year-to-year performance assessment.

18. **There is scope to reconsider FMO target groups.** The FMO has an important corporate communication role to play, and the many strands of this role are clearly described in the Communication Strategy. The current communication goal and target groups for the FMO's communications have been defined in close cooperation with the Donors, as raising awareness among the following groups:

1. Potential project promoters and project partners
2. The EU institutions and relevant Brussels-based actors
3. Relevant EU-affairs journalists in Brussels

Given the FMO's mandate and the limitations of its communication budget, it is not possible to achieve a big increase in raised awareness across all of the above groups. However, if the FMO were to identify the specific objectives and targets for these groups, it would be easier to define which groups and sub-groups to prioritise at which point. Also, this would provide increased clarity regarding the responsibilities of other stakeholders who support the bulk of awareness raising in the Beneficiary and Donor States.

⁷ The bulk of this study was carried out before the FMO's Communication Strategy was adopted.

⁸ Effective communication strategies are research-based, including formative research to inform planning of communication activities. Target audiences are listed, but there is no mention of research or their specific needs.

Recommendations

Communication requirements

1. **We recommend** updating and reinforcing the FMO's guidance documents to provide more concrete guidance on how to implement effective communication. The following elements should be considered:
 - a. Developing an online guide allowing users to click through to the elements of most interest. The following topics should be included:
 - preparation of communication strategies and plan
 - preparing Grants' websites
 - communicating on social media
 - using logos
 - organising online events
 - measuring the effects of communication activities.
 - b. Including and sharing best practices identified in this or the previous funding period, in the Beneficiary States.
2. **We recommend** that in terms of communication on social media:
 - a. The NFPs are encouraged to create Grants-specific accounts (and actively use them) on the key platforms, which correspond to their target audiences. Given the different nature of each channel in terms of target groups and suitability for Grants' content, NFPs should choose to focus on a subset of channels rather than trying to communicate on all (Facebook, Twitter, YouTube, Instagram and LinkedIn⁹), but also share the key posts on the generic accounts of their institutions.
 - b. POs and PPs are not required to create specific accounts for the programmes, but rather actively use their generic accounts to publish Grants-related content and use these accounts to amplify NFP posts.
 - c. The FMO also supports NFP social media efforts by facilitating further social-media specific workshops for NFPs to confirm best practices in social media, including to increase understanding of the key characteristics of each channel and how to maximise potential, as well as ideas for ways to generate creative posts.
 - d. The FMO continues to encourage the NFPs to share and translate specific FMO's posts or use of Grants-specific hashtags.
3. **We recommend** that the FMO further encourages NFPs to strengthen exchanges between the NFP and PO communication staff creating 'national communication networks' of communication professionals led by NFPs. Donor embassies could also be invited to join actively or as observers. Currently, the FMO offers communication support to NFPs, but this does not seem to be consistently shared with other communicators at PO and PP level. Creating a formal structure (i.e. a national network which meets regularly) could facilitate cooperation.
4. **We recommend** that the FMO and the NFPs adopt a flexible approach to applying communication requirements to PPs in exceptional circumstances. In some cases, their projects are not relevant to fully-fledged external communication, which could even create issues for grantees (e.g., signalling the location of shelters for victims of domestic violence/human trafficking).

⁹ Each social media platform has its own characteristics and user profiles. A more tailored approach implies selecting the channel that specific target audiences use and adapting content so that it suits the target audience.

Communication performance

5. **To increase the communication impact of stakeholders in the Beneficiary and Donor States, we recommend a stronger focus on *promotional communications* to complement the already successful *information provision* on Grants. More specifically, **we recommend** that the FMO requires:**
 - a. **NFPs to conduct target group analysis to support prioritisation of target groups, which might be different for NFPs versus POs, and the identification of target group needs that will feed into communication objectives and key messages per group.** NFPs and POs should set objectives and define channels per priority target group. In each country, there need to be clear roles and responsibilities for providing information on Grant opportunities and results, as well as with regards to promotion of the Grants and the relationship with Donors.
 - b. **SMART communication objectives to be set at national and programme level.** As there appears to be a lack of understanding about SMART communication objectives are, it is also recommended that training is provided to support stakeholders.
 - c. **National communication strategies to cover a shorter timeframe, for example 3 years, and/or to update the national plan at least once on the basis of research that confirms the extent of the achievement of objectives.** In addition, national strategies should be supported by annual plans, which provide the details of how specific activities correspond to a small number of objectives.
 - d. **Communication strategies and plans to include targets for reach and some form of engagement by channel and tool. As well as definitions of the types of monitoring data that will be collected and methods of collection,** before launching their communication activities. Initially targets should relate to the previous activity period, which provides the baseline going forward. This will ensure that stakeholders can show how their activities contribute to meeting their objectives.
6. **We recommend** that the FMO encourages national and programme-level stakeholders to focus on how to increase the reach and engagement of their activities, including the use of paid promotion and campaigns, with specific objectives to address specific communication problems. To do this, there is a need for research to clearly define what the current problems are. Possible issues could include (but would need to be confirmed in research):
 - insufficient high-quality applications from specific profiles of applicants
 - lack of awareness of opportunities among target applicants
 - insufficient awareness of the contribution by the Donors by organisations that represent potential applicants and or potential or actual beneficiaries
 - missed opportunities for additional synergies between key stakeholders in the Beneficiary and Donor States, etc.
 - lack of understanding of the contribution of the EEA and Norway Grants on specific topics for example climate, by politicians
7. **We recommend** several changes related to monitoring and evaluation of communication, including that:
 - a. The FMO develops an **evaluation and monitoring framework** for stakeholders' communication activities, which defines key indicators at output, outcome, and impact level¹⁰ for different types of communication channel and tools.
 - b. National and programme level stakeholder are required to:
 - set targets for outputs and outcomes by channel and tool (based on the previous year's performance) and aim to improve this performance year-on-year

¹⁰ It is challenging to generate communication impacts, for example behaviour change or calls to action, but showing the logical results chain, would help the FMO to confirm how specific communication activities support the communication goals of the Grants.

- to define a small set of overarching **outcome key performance indicators (KPIs)** to be measured yearly, which would allow measuring progress and comparability between Beneficiary States. It would provide communication stakeholders with a clearer understanding of whether their communications are working. This would also help the FMO to track progress more consistently
8. **We recommend that the abovementioned evaluation and monitoring framework is aligned with methods of evaluating FMO's communication performance**, so that it allows for overall assessment for a specific time period, for example yearly and at a halfway point in the funding period

Support to stakeholders

9. **We recommend that the FMO continues to support the NFPs with training and workshops, but also reinforces NFPs' role of sharing lessons learned with POs. We recommend that the FMO provides guidelines for NFPs on how to support stakeholders in their countries, by:**
- a. Continuing to provide training and workshops for POs. Consideration could be given to engaging external experts to support training at national level, as well as train-the-trainer approaches where stakeholders at each level train the next level down (FMO, NFP, PO, PP). Important topics include setting SMART objectives, using social media, developing monitoring frameworks and working with communication agencies.
 - b. Translating key elements of the Communication and Design Manual (or expanded guiding documents as suggested above) into local languages for use by POs, FOs and PPs.
 - c. Identifying opportunities to increase collaboration to support joint activities involving the NFP, POs (and potentially also with the Donor embassies), for example a calendar of key and possible joint events, expectations for re-posting social media posts, and implementing joint thematic campaigns.
10. **We recommend that the FMO provides a template for communication strategies and plans** (a Word document to be used to draft these documents), in addition to guidance in the Manual. The template should include instructions related to setting SMART objectives by target group. The template should include a table where stakeholders indicate the relevant communication objective, the communication activity, the audience, the timeframe and the budget, as well as a target output and outcome. Similar templates should be available for annual reporting, the Annual Programme Report and the Strategic Report in particular, to report the KPIs.
11. **We recommend that the FMO creates a webpage within the FMO website for all communication materials for stakeholders.** These documents are currently stored on a 'resources' subpage, which includes contractual and programming documents. Consideration could also be given to using this page to encourage stakeholders to communicate effectively. The communication subpage would include:
- a. the FMO communication strategy and national communication strategies
 - b. guidance documents, including on using social media
 - c. success story project examples and templates to encourage PPs to prepare their stories
 - d. photos, visuals, etc
 - e. materials for reuse (templates, logos, online events backgrounds, roll up templates)

If it is not possible to create a new subpage within the current website structure, it would be useful to at least refine the filter on the resources page to allow users to filter all 'communication' resources.

12. **We recommend using a multi-site tool to establish a Grants website network**, with the FMO's website design and layout being replicated by national Grants websites. Such a "multisite" would make it easier to ensure consistent high quality in the Grant's online presentation and support raising the profile of the Grants as distinct from EU funds. In addition, this approach will provide comparable website analytics, to facilitate better understanding of user experiences and engagement.

13. **We recommend that the FMO and the Donors define a risk communications procedure** so that ACF FOs have a clear procedure to follow if they receive a negative backlash, e.g. in relation to LGBT rights, gender equality, integration of migrants, etc. We recommend developing risk communication mitigation strategies within the FMO's communication network, which should confirm the role to be played by each stakeholder (FMO or Donor States' embassies) to support FOs or relevant PPs issuing a public statement for the media.

FMO's Communication strategy and activity

14. **We recommend that the FMO refines the communication strategy**, to include:
- SMART communication objectives linked to specific target groups
 - Whether the FMO should actively focus on potential partners and participants and/or focus on presenting the Grants at a corporate level to EU / government level stakeholders
 - Set a small number of KPIs for FMO communication performance
 - Define which measures will be used to assess these KPIs
15. **We recommend that the national and programme level stakeholders develop national versions of FMO-led communication campaigns**, with the aim of generating (national) media coverage. Currently, FMO campaigns, such as #CivilSocietyStartsHere or #EEAchdropcounts, are shared with NFPs and FOs who translate and share the FMO's materials for example via social media. However, going forward we recommend that NFPs and FOs use the FMO defined themes to create their own high impact, multi-channel campaigns at national level, with the exact timing of these national campaigns tailored to generate maximum impact within a specific Beneficiary State. The FMO can keep a coordinating role, providing the design, key messages (to be translated) and general coordination of effort. The NFPs (and/or POs or FOs if relevant) should be invited to co-create the campaigns, in particular propose a set of activities to be carried out in their country. Country campaigns can be implemented in all or a sample of Beneficiary States.
16. **Although we acknowledge the importance of EEA abbreviation, we recommend not to use this abbreviation in external communication towards the Beneficiary States.** The available polling data on current levels of recognition and understanding of EEA in the Beneficiary States was patchy. But anecdotal evidence suggests that there is a general lack of understanding of this abbreviation and its variable formulation in local languages in the Beneficiary States. We acknowledge that the use of the abbreviation should be carefully considered, therefore we propose two stage approach:
- we recommend** carrying out a brand recognition survey, focusing particularly on the recognition of the EEA abbreviation, in a sample of Beneficiary States. If the study confirms the lack of awareness of the abbreviation, then:
 - we recommend** eliminating the abbreviation from external communication, mainly from social media. As a result of the change of the Grants logo, the abbreviation was quite successfully removed from the Grants' website (currently it is not displayed in the header of the website, only in the text of descriptions and news). Further progress could be made, if the abbreviation was removed from the names of social media channels. 'EEA and Norway Grants' could be replaced by either:
 - Iceland, Liechtenstein and Norway Grants / Norway Grants (reflecting the approach used in the logo, but this option is also the longest)
 - Iceland, Liechtenstein and Norway Grants (a shorter version with alphabetic order of the Donors)

3. Answers to the evaluation questions

Relevance: Communication requirements fit-for-purpose

To what extent do the current provisions of Annex 3 to the Regulations ('Communication Annex') respond to the needs of the FMO in terms of communicating about the Grants? (EQ1)

Answer to the evaluation question

The study suggests that the current provisions of Annex 3 generally respond to the stakeholders' needs. They provide clear instructions with regards to the overarching aims of communication and definitions of communication roles and requirements by NFPs, POs and PPs. They confirm which types of activities to implement. The fact that these specific needs are met is also reflected by the level of satisfaction with Annex 3 and feedback that the requirements are sufficiently clear and specific. The study confirms that Annex 3 is fit-for-purpose to the extent that it ensures a common and consistent approach to communication planning, as well as the approach to be taken with regards to websites. However, the evidence does raise a number of questions, as to whether changes to bring Annex 3 up-to-date are required going forward, taking into account the move online, due to the Covid pandemic, and/or whether other support should fill any identified gaps.

The requirements focus on the communication strategies, communication plans and websites. The evidence confirms that Annex 3 has led to the preparation of strategies, plans and websites that comply with the key requirements and needs of the FMO. In particular, the strategies and websites are generally well structured, provide the required information and are of a high professional standard in terms of look and feel. The only missing elements are of a more technical nature, such as information on the administrative departments (missed in 22% of plans) or contact person (18%), but sometimes also evaluation measures (20%).

Despite this, this study suggests that although all Beneficiary States are obliged to fulfil the same requirements, there is variability in the level of engagement in communication between different countries and stakeholders. Our findings imply that variability is not a reflection of inadequate national communication strategies.

There is some evidence to suggest that when a communication strategy is prepared by an external contractor, there may be a gap between the aspirations and goals of strategic plans and the communication plans developed, as well as the communication activities, which are actually implemented lower down the chain. The activities do not necessarily meet the standards set. This finding is reflected by evidence that communication plans comply with the requirements to a lesser extent, with only a third fulfilling all Annex 3 requirements, and some requirements are not fulfilled by significant number of plans.

This raises several questions, including the extent that the FMO may enhance the level of compliance / engagement with communication activities with additional support including training, manuals, templates and guidance and sharing best practice, and the extent that there is a need to further extend/develop the list of requirements in the Annex 3 to support the next generation of communication. Annex 3 includes a focus on the websites for the Grants but does not include specific instructions when it comes to social media, which appears to be an obvious gap and was highlighted by NFPs in their survey responses.

The study findings

According to the **surveys**, respondents from the Beneficiary States confirmed that their communication roles and responsibilities were clearly defined in the Regulations and the Annex 3. The average rating was higher among POs and FOs (4.3), than PPs (4.1) and NFPs (4.0). It was significantly lower in case of Donor project partners (3.5). (Respondents' assessment was based on a slider with values between 1.0, not at all, and 5.0, to a great extent).

Despite this rather positive feedback about the provisions of Annex 3, the study also suggested that they did not ensure full compliance of communication activities with the requirements.

The **desk research** confirmed that the communication strategies and Grants' country websites, developed by the NFPs, generally complied with the key Annex 3 requirements. The few missing elements tend to be of a technical nature, e.g. the contact person was not specified in two of them. The desk review did not uncover any significant issues with compliance of the communication strategies with the requirements. All but one strategy also included a baseline study

as recommended by Annex 3 (it was not an obligation). However, in general, there is still room for improvement. Most of the strategies would benefit from defining more specific target audiences, rather than referring to the general public. Significant progress could also be made in terms of defining measurement frameworks, including definition of indicators, targets and sources of evidence.

What is more, the desk review of the communication plans developed by the POs showed that only a third fulfilled all Annex 3 requirements. The table overleaf presents the number of reviewed communication plans that do not fulfil certain requirements.

Table 1. Communication plans compliance with Annex 3 requirements

Overarching requirement	Specific requirement	The number of communication plans which do not fulfil the requirement (out of 88)
• Description of the objectives of the communication & target groups	○ Objectives	3 (3%)
	○ Target groups	1 (1%)
• Strategy and content of the information & communication measures	○ Activity list	7 (8%)
	○ Communication tools	6 (7%)
	○ Timeframe	14 (16%)
• Major information activities on progress & impact	○ Event 1	12 (14%)
	○ Event 2	13 (15%)
• Evaluation plan	○ n/a	18 (20%)
• Website /webpage dedicated to the Programme	○ Website/ webpage	3 (3%)
	○ English version	5 (6%)
• Information on administrative departments or bodies responsible for implementation of measures	○ Information on the admin. departments	19 (22%)
	○ Contact person	16 (18%)

Source: EEA & Norway Grants Communication plans, created by the study team

The requirements that were most frequently not met relate to evaluation plans and information on administrative departments or bodies responsible for implementation of measures, as well as the timeframe of communication activities. However, there are significant differences between the Beneficiary States, for instance:

- in the Czech Republic, most of the plans do not include information on two major activities as required by Annex 3 (a major launching event and a major closing event), although this is generally not an issue in other Beneficiary States
- contact persons are not provided in most of the plans in Romania
- information on the administrative departments is missing in most of the plans in Bulgaria, but this is not the case in other countries

Generally, there are significant differences between the Beneficiary States and between the Programmes. Portugal, Slovenia, Slovakia (and Poland to a lesser extent) meet almost all requirements in their communication plans. None of the eight Bulgarian communication plans meets all of the requirements. In Romania, only one plan out of 11 fulfils all requirements.

Despite these issues with fulfilling communication requirements, feedback from stakeholders in the surveys and case studies did not confirm that any of the requirements are particularly challenging for them (see more below in **EQ2**). This suggests that a new approach to setting communication requirements may be needed. It could better respond to the FMO's needs to support the development of quality communication plans and activities (see **EQ3**).

To what extent are some of the communication requirements perceived as helpful, and which are perceived as burdensome, by the stakeholders? How can this be addressed? (EQ2)

Answer to the evaluation question

The study confirms that the communication requirements are considered helpful rather than burdensome to stakeholders. In particular, having a list of requirements is useful, as it supports the development of communication strategies and plans and helps structure the activities.

The study did not confirm that the communication requirements are particularly burdensome for stakeholders involved in the implementation of the Grants. Respondents confirmed that they did not find the communication requirements particularly challenging and none of the communication requirements included were considered above-average challenging. The feedback was similar across stakeholder groups. Only some minor issues were identified, mainly with the required number of events to be organised and the inability to create project logos. However, these issues were mentioned only by a few stakeholders.

The study findings

In the **surveys**, respondents reported that the requirements have helped them develop and implement effective communication strategies or plans. The feedback was similar across stakeholder groups. The score was only slightly higher among FOs (an average answer amounted to 4.1 out of 5.0) than POs (4.0) and NFPs (3.9).

Respondents confirmed that they did not find the communication requirements particularly challenging and none of the communication requirements included were considered 'above-average' challenging. Those that received a slightly higher score, i.e. were rated as more challenging than others, across NFPs and POs, included:

- Designing the content for information and publicity measures (average answer of 2.5 out of 5.0)
- Reporting on the results (2.4)
- Deciding which channels and tools should be used to implement the information and publicity measures (2.4)
- Preparing the strategy / plan for information and publicity measures (2.4)

In the case of PPs, the most challenging ones, according to the survey, were:

- Ensuring the website is also available in English (2.7)
- Carrying out the required number of events (2.7)
- Communicating the results of bilateral cooperation (2.6)
- Designing the content of communication (2.6)

In communication strategies or plans, there are different issues highlighted as not fulfilled, as discussed above. This confirms that none of the requirements stands out as particularly burdensome or challenging. Moreover, for all the potential challenges assessed in the survey, the average rating was below 3.0, i.e. below the neutral answer. We therefore consider that the requirements in general do not create particular challenges to stakeholders.

In open comments to the survey, some respondents noted that the communication requirements set the general guidelines and directions for the communication strategies and plans, giving actors the responsibility and freedom to make individual, tailor-made choices. Apart from the general requirements, some respondents commented that the requirements provided other valuable information, such as number of main events, web requirements, etc. The additional information provided in the communication and design manual was also found to be very useful.

The country **case studies** confirmed these findings. Interviewees consulted in the five Beneficiary States gave rather neutral assessment of the requirements, neither reporting that they have particularly helped them, nor that they were burdensome. In a few cases, interviewees requested that there should be a possibility to create programme/project logos. Overall, the feedback collected suggests that communication requirements are to some extent useful for planning communication activities, which implies that there is no need to amend them.

Only minor requirements were considered troublesome:

- the requirement to organise starting and closing events for each programme and project
- inability of creating a project logo combined with the EEA Grants logo (in particular in Portugal and Romania the interviewed PPs suggested that the design and use of personalised logos for specific projects should be allowed, however in the surveys stakeholders gave neutral feedback if this should indeed be changed in the Regulation)
- to replace the information stand/billboard with a permanent commemorative plaque
- inability to adjust the requirements to the characteristics and ambition of projects (for instance some Slovakian PPs questioned whether it is fair to expect smaller organisations to submit very detailed statistical indicators: number of participants, number of website visitors, number of promotional leaflets etc.) as part of the application process), but this is not directly linked to Annex 3 requirements

Only in Romania, some of the interviewees reported that the complexity of existing requirements is burdensome especially for organisations that are not used to communicating on a regular basis. They reported that in some cases it can be difficult to follow all the requirements due to the specificity of certain projects (e.g., signalling the location of shelters for victims of domestic violence/human trafficking).

Some respondents asked about requirements highlighting that there is a need for more training on communication at country level to help to raise the standard and enhance communication results.

Are there any possible simplifications, for both the 2014-2021 period and a possible new mechanism? Which, if any, of the current provisions of the Communication Annex should be changed once the Regulations are updated for the next Financial Mechanism? (EQ3)

Answer to the evaluation question

The evidence indicates there is no need to simplify communication requirements. However, this question implies that the main need relating to Annex 3 relates to simplification. Our findings, however, suggest that there may actually be scope to reinforce and/or consider whether additional aspects should be included in the provisions under the next Financial Mechanism. This is backed up by feedback from NFPs who consider that there is a need for more detail in the requirements and not more simplification, which would presumably make it easier for them to reinforce the requirements in country.

The requirements were rightly amended to remove the obligation requiring larger projects to set up dedicated project websites. For each new website, a new community of users needs to be nurtured. It is much more resource efficient to tap into existing well-established websites, which already have an established user community and other communication activities. This implies a focus on centralising the promotion of projects as a means of increasing visibility and as a means to reinvigorate existing websites. This aspect is reinforced by the reality that websites are only kept up to date whilst projects are on-going, after which they become redundant. This limits the possibility to create an active and engaged community for Grants in each state, an aspect that NFPs in particular favour.

A comparison with other international organisations suggests a few more adaptations – not of single requirements, but the entire approach to setting communication requirements, which could be beneficial for the Grants. Key questions for the FMO relate to the level and type of requirements and guidance at each level and the extent that effectiveness could be maintained if some aspects are retained as guidance only. For example, the FMO could consider developing ways to better support stakeholders' communication, especially those below NFP level, by, for instance, preparing similar guidelines, which could be transferred and translated to POs and PPs.

Given the complex structure of the Grants' network in the Beneficiary States, the FMO would mainly need to keep responsibility for guiding and supporting communication of the NFPs, at country level. The NFPs should play a similar role towards the POs and even the FOs (despite their being outside the NFP structure). POs and FOs should play a similar role towards PPs. However, the FMO would need to ensure that NFPs and POs indeed engage in providing guidance and support.

The study findings

Stakeholders' opinions about the need to amend the requirements

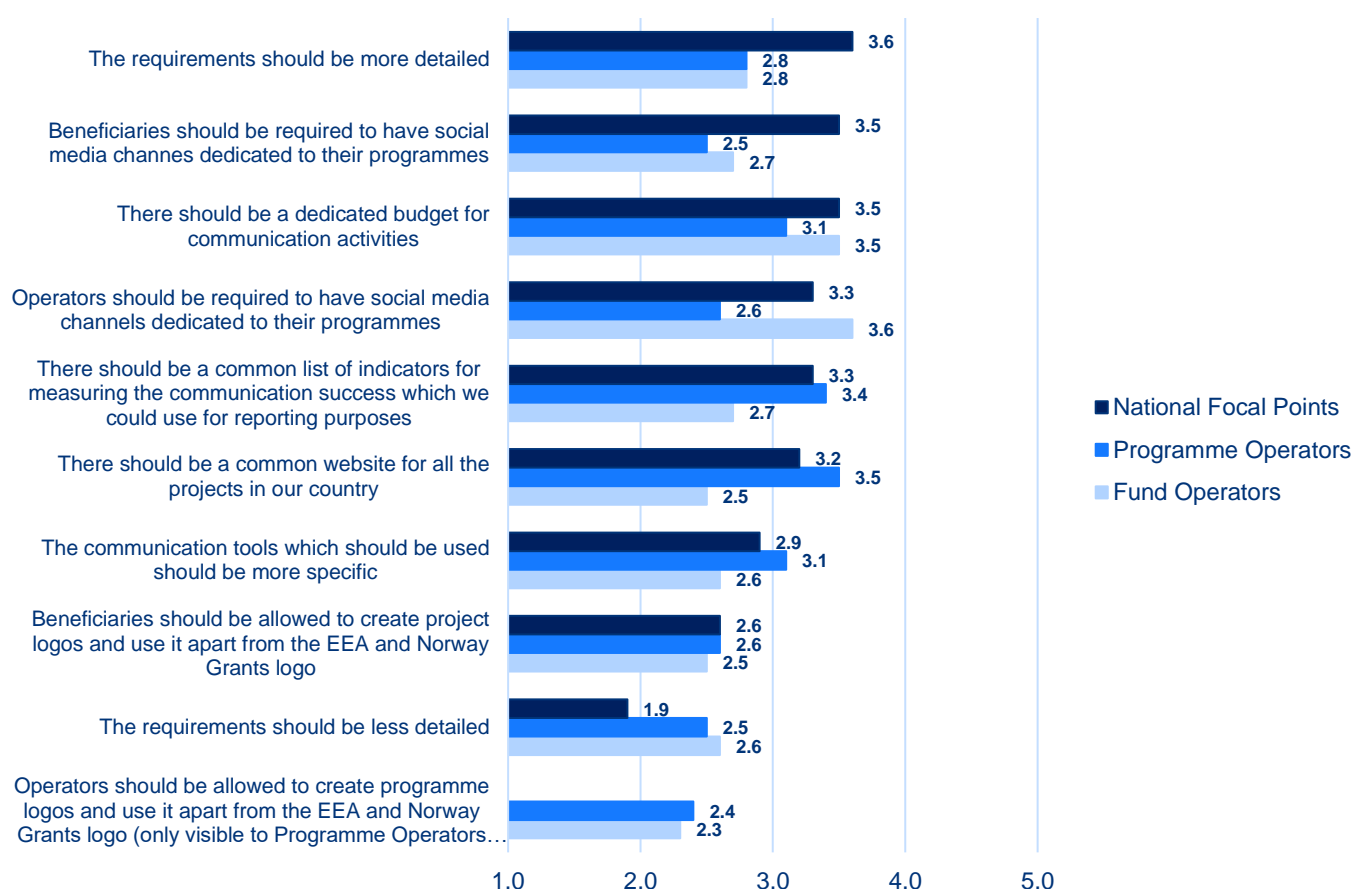
The stakeholders provided mixed feedback about the need to amend the communication requirements.

In the **survey** to NFPs, POs and FOs, respondents were informed that the FMO may revise the requirements for communication in the update to the Regulation and asked to what extent they agreed with a number of statements related to such revisions, on a scale of 1 (disagree) to 5 (agree).

NFPs were the only group of respondents which tended to agree that the requirements should be more detailed (on average 3.6 out of 5.0, so between 'rather agree' and neutral answer). They also tended towards disagreeing that the requirements should become less detailed (1.9 out of 5.0). POs and FOs tended to select neutral answer (2.8 for requirements becoming more detailed and 2.5-2.6 for less detailed).

All other potential revisions were assessed similarly. Respondents tended to neither agree nor disagree that they should be implemented. The average rate was close to a neutral answer of 3.0 and generally within 2.5-3.5 range:

Figure 1. Level of agreement with potential revisions to the Regulations by NFPs, POs, FOs (mean values)



Sources: Mid-term assessment surveys

The feedback from the DPPs was very similar. The average for all the options for potential amendments of the Regulations was between 2.7 and 3.3 out of 5.0, so close to neutral answer. There was neither strong support for a proposal that the requirements become less detailed (3.1 out of 5.0) nor that they become more detailed (2.7 out of 5.0).

Feedback from the project level was mixed too. About half of respondents indicated that the requirements should become more detailed (52%) and half that they should become less detailed (48%). Donor project partners tended to indicate that they should become less detailed (61%) and PPs that they should become more detailed (55%), but there were significant differences between respondents from different Beneficiary States. In Romania for instance, the majority (three in four) of respondents indicated that they should become more detailed. Whereas the precise opposite was true in Latvia (where three in four indicated that they should become less detailed).

In the **case studies**, we did not encounter proposals for any far-reaching changes regarding the communication requirements at programme level. In Romania, one interviewee suggested that there should be more flexibility regarding the requirements to maintain an active Facebook page: it may be blocked or closed due to complaints filed by people who do not agree with certain sensitive topics, e. g. LGBT rights. Referring to the requirement for larger projects to have a specific project website (this requirement was abandoned in the amended Annex 3), one Slovak interviewee recommended 'centralising' to a certain extent communication about large projects, i.e. promoting those projects through the central EEA and Norway Grants website.

PPs interviewed by the study team did not make any suggestions to simplify the communication requirements apart from the possibility of designing and using project logos. The exception was Portugal where the interviewees at project level suggested that the requirements should be simplified (clearer explanation of the requirements) and also better explained to beneficiaries at the beginning of project implementation. According to them, sending the EEA Grants communication manual does not guarantee a complete understanding of the requirements. This reinforces the finding that focusing efforts on guiding stakeholders could be more beneficial than providing a list of requirements.

Experiences of the benchmarked organisations

As discussed above, our findings did not confirm that any of the requirements are particularly challenging for stakeholders to fulfil. Meanwhile, the current approach of defining quite a detailed list of requirements did not ensure that all obligations were fulfilled. As discussed above, only a third of communication plans fulfilled all Annex 3 requirements.

The **benchmarking exercise** carried out within the study, i.e., a comparative analysis of the FMO's approach and the approach of other international organisations: the World Bank and the two entities from the European Commission framework, the Directorate-General for Regional and Urban Policy (DG REGIO) and the Service for Foreign Policy Instruments (FPI), suggests that the FMO could take a different approach to ensuring proper communication within the Grants. This could be a way to simplify the requirements.

One of the key findings from the benchmarking exercise is that there is a spectrum in terms of the level of requirements from funding organisations for communication about programmes and projects by donors and beneficiaries. Based on the small sample, the FMO appears to be on the more prescriptive end of that spectrum. DG REGIO and the World Bank do not specify for instance the structure of Grants-related websites or the number of events that have to be organised, allowing for more flexibility and creativity of the beneficiaries and managing authorities. Beneficiaries propose communication activities in their communication plans, which are reviewed and approved. This ensures that communication tools and channels are adjusted to the specificity of programmes and projects, but obviously also implies a lower level of direct control over the selection of tools used.

DG REGIO and the World Bank appear to focus more on supporting the beneficiaries and other stakeholders and to create effective collaborative partnerships rather than to require the application of a long list of rules and regulations. This support includes providing guidance and templates, sharing best practices and providing training, as well as implementation and coordination of joint multi-country campaigns. DG REGIO also encourages creating national communication networks to share best practices and experience.

The use of consistent branding is a must. Both DG REGIO and the World Bank set clear rules when it comes to visibility (these relate to use of EU/WB logos and centralised slogans / messages about their contribution). There are financial sanctions when these rules are not implemented. The benchmarked organisations use very few 'hard' requirements, compared to the FMO. Instead, they focus on their own communication activities to provide aggregate evidence in digestible formats and support organisations to carry out efficient communication through guidance measures.

A further consideration is the potential use of spot checks, similar to the evaluations of communication carried out by the World Bank where a random sample of projects are picked to assess their performance. This process can provide specific examples that can be shared and may incentivise communicators. The inclusion of communication aspects in FMO monitoring could also be considered, as an element that would follow simplification of the requirements.

Effectiveness: Implementation of the communication requirements

How are the communication requirements of the Regulations, annexes and guidelines followed up in different Beneficiary States across the programmes they are implementing? Which Beneficiary States exceed the basic requirements in the Regulations and which ones are underperforming? (EQ4)

Answer to the evaluation question

With regards to the implementation of communication requirements, our key finding is that all communication strategies comply with the key requirements. With regards to communication plans, Portugal, Slovenia, Poland, Slovakia, Lithuania meet almost all requirements. Czech Republic, Greece, Bulgaria and Romania are the countries with the highest number of issues with communication plans, but this was often related to single plans not fulfilling many requirements (e.g., Local Development and Poverty Reduction Programme in Greece, Home Affairs Programme in Romania) or some requirements constantly not being met (e.g., contact person missed in most Romanian plans, and two major communication activities in most Czech plans). Portugal stands out as exceeding the basic requirements.

The study findings

Communication strategies

The **desk review** of communication strategies developed by the NFPs showed that, generally, these documents comply with Annex 3 requirements. The few missing elements tend to be of a technical nature, e.g. the contact person was not specified in two of them. The desk review did not uncover any significant issues with compliance of the communication strategies with the requirements. All but one strategy (from the Czech Republic) also included a baseline study as recommended by Annex 3, which was a recommendation rather than an obligation.

However, there is still room for improvement. Most of the strategies would benefit from defining more specific target audiences, rather than referring to the general public.

The compliance of EEA and Norway Grants websites and social media with the communication requirements is presented below in **EQ6** (websites) and **EQ7** (social media).

Communication plans

As highlighted above, the desk review of the communication plans developed by the POs showed that only a third fulfil all Annex 3 requirements. There are significant differences between the Beneficiary States and between the Programmes. Portugal, Slovenia, Slovakia (and Poland to a lesser extent) meet almost all requirements in their communication plans (as well as Malta and Cyprus, but in their case only one documents was included in the review). None of the eight Bulgarian communication plans meets all of the requirements. In Romania, only one plan out of 11 fulfils all requirements. The detailed numbers are presented in the table overleaf.

Table 2. Communication plans compliance with requirements – average per country

Beneficiary State	Number of communication plans reviewed	Average number of requirements met (out of 12)
Malta	1	12
Cyprus	1	12
Portugal	5	11.8
Slovenia	3	11.7
Poland	11	11.5
Slovakia	6	11.5
Lithuania	7	11.4
Croatia	5	10.4
Latvia	7	11.3
Estonia	5	10.2
Romania	11	10
Greece	7	9.9
Bulgaria	8	9.9
Czech Republic	10	9.8

Source: EEA & Norway Grants Communication plans, created by the study team

Overall, the following countries are above the average value (10.9): Portugal, Slovenia, Poland, Slovakia, Lithuania, Latvia. The following countries are underperforming and below average: Czech Republic, Bulgaria, Romania, Estonia and Croatia. Malta and Cyprus have plans which comply with all 12 requirements, but so as not to distort the average (given they have just one plan each), they were excluded from the calculation.

The requirements that were most frequently not met relate to evaluation plans and information on administrative departments or bodies responsible for implementation of measures, as well as the timeframe of communication activities. However, there are significant differences between the Beneficiary States:

- in the Czech Republic, most of the plans do not include information on two major activities as requested by Annex 3, although this is generally not an issue in other Beneficiary States
- contact persons are not provided in most of the plans in Romania
- information on the administrative departments is missing in most of the plans in Bulgaria, but this is not the case in other countries

Most communication plans would be improved if they used definitions of their target audiences and presented their monitoring frameworks.

Below we present an analysis of fulfilment of the requirements in the communication plans. The detailed information of their compliance per requirements is presented in a matrix in Annex 4 to this report.

In line with Annex 3 of the Regulations, a communication plan must include a description of the programme's information and communication activities, which is the case of the majority plans reviewed. However, there are significant differences between the plans. Some plans fail to fulfil most of the requirements, for instance the Romanian HOME programme only fulfilled 5 out of 12 requirements, although other plans in Romania fulfilled all (Active Citizens) or most of requirements. The Greek Local Development and Poverty Reduction plan only fulfilled 4 out of 12 requirements, which is the fewest among all plans.

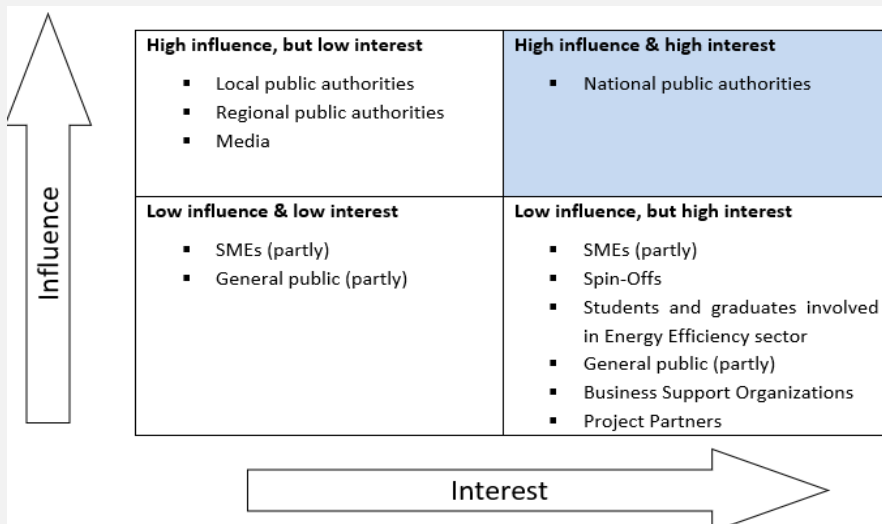
Description of communication objectives and target groups

Out of the 88 plans, 85 plans include information on their communication objectives. All, but one plan, list their target groups, as required in the Annex 3. However, there are generally limited details related to target groups. For instance, the Polish Business Development and Innovation Programme includes a short list of stakeholders with no further detail.

Good practice

The Greek Energy programme's communication plan is an example of well-presented target groups. They are detailed in a simple table, as well as included a stakeholder mapping, which categorises the stakeholders in terms of the strength of their interest and the degree of their influence.

The Portuguese Culture programme is another good example of a well-defined target group which also draws a link between the specific objectives and the relevant target groups. The communication plan devised for the Slovenian Climate programme is also an example of a plan with detailed target groups.



Source: Extract from the Greek Energy communication plan, figure1, p.8

Strategy and content of the information and communication measures

Eighty-three plans describe the strategy and content of the information and communication measures, generally including a list/table of activities and communication tools. The timeframes are not often clearly defined for all the activities and this requirement is not met by 12 plans.

Most plans also provide information on two required major information activities on the progress, results and impact of the programme and the Donors' contribution. Only 12, including most of the plans in the **Czech Republic**, do not. The review of the plans highlighted that these events mostly take the shape of conferences, which target a broad range of stakeholders, including policy makers, civil society organisations, general public, potential beneficiaries and actual beneficiaries, etc.

Good practice

The **Slovenian Climate and Education Programmes** offer a well-structured evaluation plan, with indicators and targets set for each communication objective, as well as the timeframe for reporting.

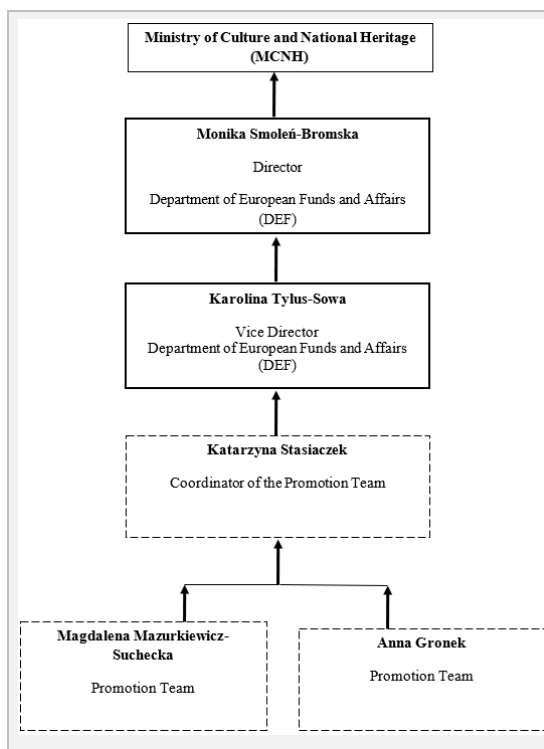
Communication objective	Indicator	Unit of Measurement	Initial Value	Target value at the end of period	Source	Frequency of reporting	Methodology
General objective Enhancing the public awareness of the EEA and Norway Grants	Awareness of EEA and Norway Grants	Percentage	56,1 %	75%	Survey (NFP)	2018, 2024	Percentage of respondents to the survey having heard of the EEA and Norway Grants

Source: Extract from the Slovenian Climate communication plan, p.14

Inclusions of relevant links and contacts

As required, information on a website/webpage dedicated to the Programme is mentioned in 85 out of 88 plans, but these have little detail and no information on the intended regularity of the updates or the language(s).

The information on the administrative departments or bodies responsible for implementation of the information and communication measures is presented in 69 of the plans. 72 include a contact person.



Good practice

The **Polish** Culture Programme provides an example of well-presented information on the roles, responsibilities and department in charge of the communication measures. It presents the organisational structure of the implementation of information and promotional activities but does not provide any contact details.

Source: Extract from the Polish Culture programme communication plan, section VII on p.12

Exceeding basic requirements

In the **survey** to Beneficiary States actors (NFPs, POs, FOs), 40 out of 82 respondents (49%) reported that they exceeded the basic requirements for communication over the last 3 years. The rest responded 'no' (24%) or 'I'm not sure' (27%).

36 respondents¹¹ provided additional comments on how they had exceeded the basic communication requirements. They reported organising more events or creating more social content and online tools. For example, a respondent from Poland reported that they had organised four events for potential applicants, a respondent from Romania highlighted organising three information events at regional level and a respondent from Malta reported organising a Multicultural event on the occasion of the 25th Anniversary of the EEA Grants. One respondent also reported they have used sign language at all events. Apart from additional events open to the general public and beneficiaries, respondents reported that they had organised capacity building events for Project Promoters and Programme Operators. These provided training and individual consultations for all Project Promoters and Programme Operators on improvement and implementation of their communication plans.

Apart from organising additional events, many respondents focused on improving their communication and social media channels. For example, some respondents reported they had created more content and visual design for their website and social media than required or creating social media strategy. One respondent created a partnership with a national radio to ensure their programme is more well-known to the general public. A respondent representing National Focal Points shared to have created a communication and design manual tailored to each programme for all Programme Operators and Project Promoters. One reported creating a Grants mobile app.

In case of DPPs, most respondents (6 out of 10) reported that they were not sure, three indicated that 'yes' and 1 indicated 'no'. Similar results were collected from PPs. Most of them (55%) reported they were not sure if their organisations exceeded the basic regulations, 28% answered 'no' and 17% 'yes'.

Respondents who replied 'yes' provided the following examples in an open question:

- Undertaking additional communication activities such as organising more events and meetings than planned or implementing additional awareness raising activities as well as creating more communication materials (e.g. photos, videos, interviews, articles)

¹¹ From Bulgaria, Croatia, Czech Republic, Estonia, Greece, Latvia, Lithuania, Malta, Poland, Portugal, Romania and Slovakia.

- Attracting volunteers who could support communication activities
- Implementing the communication plan without nonconformities and/or exceeded the indicators
- Providing a detailed communication plan
- Respecting the financial requirements
- Continuously developing contacts with PPs and other partners

Portugal, which is often presented as good practice example, has carried out several interesting and innovative activities (such as the Grants mobile app) and is active on various social media channels (see **EQ7** below). It is the Beneficiary State that stands out in exceeding the basic requirements.

The **case studies** overall did not confirm that stakeholders systematically exceed the basic requirements. They did not confirm that stakeholders conduct other types of communication activities which should be included in the requirements. However, there were a few examples of good practices, i.e. activities carried out in one country, which could be replicated in other countries. In Portugal and Latvia for instance, the NFPs translated the Communications and Design manual to Portuguese and created a Grants mobile app. In Poland, the Batory Foundation (Active Citizens Fund) developed a handbook for applicants and grantees, which presented key guidance on the programme, application, project management and accounting requirements. Other good practice examples are presented in the country reports in Annexes 6-10 to this report (separate documents).

Are there any trends in communication practices of comparable programmes (in terms of programme areas) in different Beneficiary States? (**EQ5**)

Answer to the evaluation question

The main trend in communication practices in the Grants across all programmes and countries was defined by the Covid pandemic. Offline or face-to-face communication activities were organised as online events. Social media and other online communication played an even more important role. On the one hand, the study suggests that most organisations managed to transform smoothly into this new situation. On the other hand, many potentially valuable communications activities had to be cancelled or become less effective, for instance, when local face-to-face events (“a road show”) were organised at online conferences. Online events were less interactive and could potentially have not reached people or organisations with lower digital capacities or skills. Some POs and FOs also tried to support PPs in their online communication and this could be developed in the future.

The study findings

Across the **case study** countries, the main trend in communication practices for EEA and Norway Grants was the move from offline, in person communication to online communication. However, there were some differences between the countries and programmes. In Portugal for instance, the main communication priority for the NFP was to focus on collaboration with other stakeholders and facilitating and supporting their communications. In other countries there was an increasing emphasis on content production, posting on social media or (in Slovakia) producing videos by the NFP (presentation videos for each project).

In the period analysed, most communication focused on promoting calls for projects. Stakeholders did not yet have a chance to promote project results, which many of them foresaw to be a priority later in the process of communicating about the Grants once more and more projects are complete.

At programme level, the key trends in communication practices were also driven by the pandemic, and the need to implement the planned activities in an online format.

This entailed prioritising social media, in particular Facebook, and online events, both at programme and project levels. Some POs and FOs also tried to support PPs in their online communication, organising seminars with stakeholders and other information events on the objectives and contents of forthcoming calls or having regular meetings with the PPs and providing support on communication (in Portugal).

Anecdotal evidence also suggests that Fund Operators working in ACF tend to use more creative and innovative communication measures and generally engage more in communication about the Grants, compared to POs, which are often ministries and other state institutions. But the number of FOs included in the study interview sample was limited.

Does each Beneficiary State, in line with the Regulations, have a dedicated website for the EEA and Norway Grants in each Beneficiary State, in English and in the language of the Beneficiary State? Do these websites meet the requirements listed in the Annex 3 of the regulations? (EQ6)

Answer to the evaluation question

All Beneficiary States have a dedicated website for the EEA and Norway Grants, both in English and in the national language. These websites meet the key requirements listed in the Annex 3.

Each national website presents the overall objectives of the Grants, the Donors and the EEA agreement and information about the funding programmes and bilateral cooperation. All the websites present information on the priority sectors and programme areas. The websites also include information on open calls, but the information about the estimated launch date of future calls is missing in some cases.

The most frequently missing element was 'Results & impact of the support', but this can be developed during the implementation of programmes and projects. Other frequently missing elements included: photos and videos, links to programme websites/webpages and – more importantly – a visible link to report suspicion of mismanagement of funds.

The study findings

The **desk review** of all national EEA and Norway Grants websites confirmed that these websites exist in all 14 Beneficiary States. The table below presents the list to these websites.

Table 3. Links to the EEA and Norway Grants national websites

Bulgaria	https://www.eeagrants.bg/
Croatia	https://eeagrants.hr
Cyprus	http://www.eeagrants.gov.cy/
Czech Republic	https://www.eeagrants.cz/
Estonia	https://eeagrants.fin.ee/
Greece	https://www.eeagrants.gr/
Latvia	https://eeagrants.lv/
Lithuania	https://www.eeagrants.lt/
Malta	https://eufundsmalta.gov.mt
Poland	http://www.eeagrants.pl
Portugal	https://www.eeagrants.gov.pt/en/
Romania	https://www.eeagrants.ro/en/
Slovakia	https://www.eeagrants.sk/en/
Slovenia	https://www.norwaygrants.si/

In line with the requirements, all 14 websites are available in national languages as well as in English. Only in case of Estonian several sections are in Estonian only.

However, some requirements are unfulfilled by most of the websites, in particular results and impact of the funding, links to all Programme websites/webpages, key documents, but also photos and videos. Information on upcoming calls for projects does not always include estimated launch of future calls, and a link to report suspicion of mismanagement of funds is often missing. We present the details below.

Content of the websites

On average, the websites complied with 14 out of 17 of the requirements. The Slovak and Czech websites complied in full with all 16 requirements. The least compliant Beneficiary States' websites are that of Malta (only 8 out of 17 requirements are met) and Cyprus (12 out of 17). Malta does not have a specific EEA and Norway Grants website but rather a webpage in a general section of the website about external funding, with only eight requirements met.

Each national website presents the overall objectives of the Grants, the Donors and the EEA agreement and information about the funding programmes and bilateral cooperation (including the involvement of Donor Programme Partners). Generally, information on bilateral cooperation with the Donor State(s) is presented in the main navigation menu of most websites, but the Polish and Maltese websites do not include any information on bilateral cooperation.

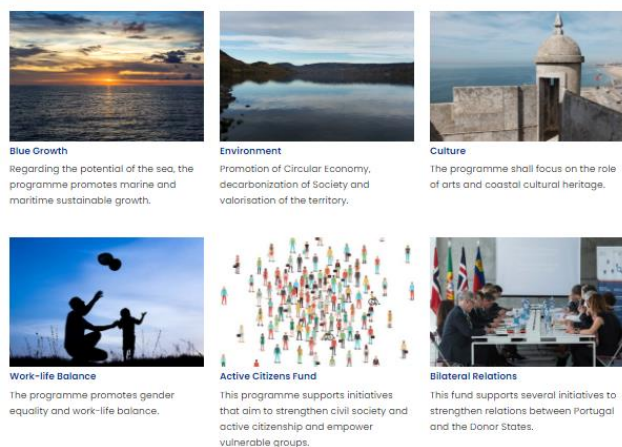
As required, all the websites present information on the priority areas and programme areas. The Portuguese, Bulgarian and Croatian websites also include an up-to-date news section.

Over half of the websites comply with most of the requirements, with the least included required elements being results and impact of the support (only three include this aspect in full: Czech Republic, Croatia and Slovakia). Most websites did not have information on the results or successes of projects that could be attributed to support from the Grants. Moreover, website sections dedicated to results and impact are frequently empty.

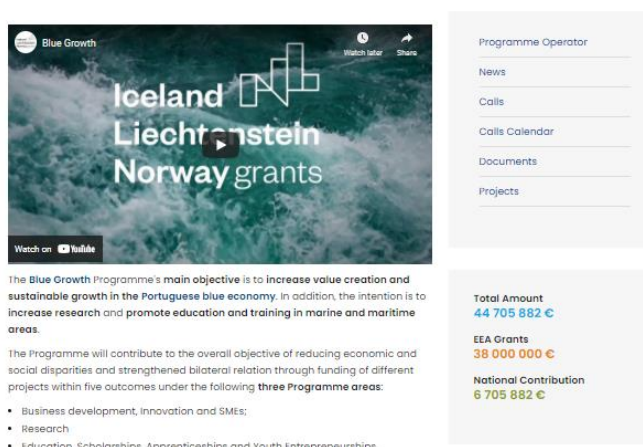
Good practice

Portugal had devised well-structured and user-friendly ways of presenting information related to their Programmes including videos, figures and an interactive map of the projects funded.

Programmes



Blue Growth



Source: EEA Grant Portuguese website

The websites also include information on open calls, but the information about the estimated launch date of future calls is missing in some cases. The Portuguese website is noteworthy for having advanced notice for upcoming ones. Neither the Estonian nor the Croatian websites provide information on upcoming calls.

Nine out of 14 Beneficiary States have a visible link to report suspicion of mismanagement of funds. Good examples include Bulgaria which provides a clear link at the bottom and top of the main page, as well as Portugal, which includes a button on the main page.

In terms of providing links to relevant documents including Strategic Reports and Minutes from Annual meetings, all websites include some documentation but with varying degrees of detail and sometimes documents are missing, such as meeting minutes, as is the case for Greece and Bulgaria.

Just over half of the Beneficiary States include relevant photos and videos on their website (only 8 out of 14). Portugal presents a good example of how to use photos and videos to support their communications, as shown in the box above.

Inclusion of relevant links and contacts

All websites include a link to the website of the generic EEA and Norway Grants and links to the websites of other relevant institutions. Mostly these were links to the EEA/Norway Grants' Donor States' government websites and Norway's embassy in their respective country. Other partner organisations involved in administering programmes or projects were also often linked. Websites commonly included the links to the programmes. The Greek website presents this information in a clear way, each programme webpage includes the link to the programme website and social media, as well as to the websites of the fund operators and also partner international organisations.

In terms of contacts, all websites include at least a general email address and sometimes include a specific contact person for the NFP. Some websites also include emails to a person responsible at programme level (for instance that

is the case for Latvia, Greece or Croatia). However, few websites include a specific press contact (as is the case of the Slovenian website). The Portuguese website stands out because it provides detailed information, as well as contact persons for the different Programmes.

The study also indicated that in some Beneficiary States, EEA and Norway Grants websites were integrated with generic websites presenting also other funding opportunities, in particular from the EU. This was the case for instance in Poland or Malta. This, on one hand, limits the flexibility of how these websites are designed and structured (to align them with the requirements), but on the other, these websites are already well established and recognised by the audiences.

How is social media used by the NFPs and POs and to which extent is it prioritised? How can the regulations or communication requirements better reflect the social media expectations the FMO has of the NFPs and POs? (EQ7)

Answer to the evaluation question

NFPs and POs report that they prioritise social media, but it is unclear what prioritising social media means in practice. Many organisations face internal challenges particularly exacerbated by the fact that responsibilities for communication typically fall to Grants' managers and not ministerial communication teams, which manage generic social media channels. Portugal stands out as the most successful social media user in terms of frequency of posting and updating, and the use of many different channels. The findings suggest that there is a need for greater support on the use of social media at all levels and that this should be driven by better understanding of each channel within each country to match channels to specific target audiences.

During the pandemic, programme stakeholders have become even more aware of the importance of using social media. The pandemic forced stakeholders to cancel their face-to-face communication activities and use online resources exclusively, mainly social media and online events. However, this increased level of awareness, did not result in enhanced social media outcomes and/or a significant increase in their level of activity in social media, implying weaknesses in using social media. Most of the NFPs only have EEA and Norway Grants account on Facebook. Portugal is the only Beneficiary State which is actively engaging on various social media channels. As most stakeholders involved at country and programme-levels are state institutions, there is a certain issue with using organisations' generic accounts, which are well established, but with limited flexibility to focus on promoting the Grants, or Grant-specific accounts, which are more flexible but less recognised or followed. The evidence suggests that Fund Operators are in many cases more active in their communication than other stakeholders.

The study findings

According to the **survey** carried out within the study, social media are one of the most frequently used channels in communicating about the Grants. It is the second most frequently used communication tool for Beneficiary State stakeholders at all level: country, programme and project (the first one was website). Project promoters rated unpaid social media as the most effective tool in terms of its ability to reach and engage the audience, together with a website. Paid social media were rated third together with videos. For DPPs, it was the fourth most frequently used channel, following a website, conferences/seminars and online events.






The **desk research** confirmed that 12 of the national websites include links to social media¹². The social media platforms used in communicating about the Grants, according to the communication planes were:

- Facebook
- Twitter
- Instagram
- YouTube
- LinkedIn

Portugal and the Czech Republic use the most social media accounts, five and four respectively. Other Beneficiary States use up to two different social media channels as presented in the figure below. Lithuania, Malta and Croatia do not comply with the Annex 3 requirement to use social media for communication. Indeed, they do not appear to have any active social media channel for communication on the EEA and Norway Grants.

¹² The study team reviewed social media channels listed on the Beneficiary States' websites






Figure 2. Social media channels used by the NFPs (as of 25.09.2021)

					
	Facebook	Twitter	Instagram	YouTube	LinkedIn
Portugal	✓	✓	✓	✓	✓
Czech Republic	✓	✓	✓	✓	
Bulgaria	✓	✓			
Cyprus	✓		✓		
Slovenia	✓		✓		
Greece		✓			✓
Romania	✓	✓	✓		
Estonia	✓			✓	
Lithuania	✓				
Latvia	✓				
Slovakia	✓			✓	
Poland	✓				
Malta	No social media				
Croatia	No social media				




Source: EEA & Norway Grants country websites/social media accounts, created by the study team

The Figures below present the numbers of social media ‘followers’ for each country and channel and the level of activity per channel. They confirm that Portugal is particularly successful not only in using social media in communicating about the Grants, but also in engaging the audience. Our research also confirmed that Portugal not only uses more channels than other Beneficiary States, but also actively and consistently uses all of them and uses EEA branding consistently.

Figure 3. The numbers of social media followers and the level of activity (as of 25.09.2021)

					
	Facebook	Twitter	Instagram	YouTube	LinkedIn
Poland	6 300				
Romania	5 007	31			
Portugal	3 914	751	1 333	N/A	2 871
Greece	2573	807			N/A
Czech Republic	1 606	61	118	22	
Slovenia	1 326		221		
Bulgaria	1 421				
Slovakia	1 400			34	
Cyprus	1 077		99		
Latvia	855				
Estonia	756			24	
Lithuania	610				
Malta	No social media				
Croatia	No social media				

Activity levels:

-  Regular activity (posts several times a month)
-  Infrequent activity (posts every couple of months)
-  No recent activity

Source: EEA & Norway Grants country social media accounts, created by the study team

Facebook

The most used platform is Facebook, with 11 NFPs using it actively. Facebook pages also attract the most followers compared with the other social media accounts reviewed, ranging from about 750 to 6,300.¹³ The Beneficiary States’ Facebook pages include photos, videos, infographics, text in the national languages, events on activities and general information related to the topics covered (e.g. climate change, health).

Poland, Romania and Portugal have the highest number of followers (Poland: 6,300; Romania: 5,007; Portugal: 3,914) and a review of their Facebook accounts confirms that they post regularly, i.e. at least every few days, mainly in national languages. In terms of engagement, their posts tend to generate between 5 to 50 likes per post, with the Romanian posts generating the most likes lately. We noted that administrators of the accounts rarely engage with comments.

¹³ All social media figures as of 25.09.2021

Good practice

An example of successful engagement with followers from a national Facebook page is that of a post on the 5 December 2020 on the **Polish** page. Account administrators organised an online competition, which generated 30 comments and 17 likes.

Social media competitions can be a good way to increase interest in a social media account by getting followers (and other users of the platform) to engage with the content of the page. The example above goes to show running an online contest or an interactive post can be the opportunity to get additional exposure and more audience insights. However, overuse of competitions is likely to reduce levels of user engagement / interest.

Source: Polish Facebook post 5/12/2020, see [here](#). Post has been translated from Polish.

ho, ho, ho! 🎅
To celebrate Saint Nicholas Day we have some giveaways for you!
🎁🎁
You can win 10 unique sets of goodies!
What do you need to do? Post a correct answer to a contest question in a comment below.
Here's the question:
During one Advent night, the darkness is lighted up by millions of candles. What is the name of a saint, whose day is celebrated pompously on 13 December also in Norway and Iceland?
The first 10 people who provide the correct answer will get a set of gadgets - a box of puzzles, a power bank, a notebook with a pen and a magnetic tic-tac-toe game.
Don't wait, first come, first served! 🎁🎁
The rules of the contest is available
here: https://www.eog.gov.pl/media/96578/regulamin_konkursu.pdf

Instagram

Instagram is used to a lesser extent (4 accounts: Portugal, Cyprus, Slovenia, and Czech Republic). NFPs generally post pictures and/or videos on the activities undertaken. With the notable exception of Portugal, the other accounts have not been particularly successful in generating followers and this seems to be related to low frequency of posting and the limited number of posts to date.

Good practice

The **Portuguese** Instagram page is an example of an active account, which makes use of all the features available on this platform. With 1333 followers, the account has more followers than any of the other Instagram accounts reviewed. Activity on the account is regular with posts published every day (357 to date) and generating many likes each. The account also includes stories presenting the various activities, as well as the team and tries to engage the audience by including short polls or links to other relevant accounts. The page also includes 37 series of videos on various Programmes (views on these range from 10 to 247 at the time of writing). An indication of the effectiveness of this Instagram account is the fact that it is often tagged by other relevant accounts.

Source: Snapshot of the *eeagrantspt* Instagram page

YouTube

YouTube is used by four Beneficiary States (Czech Republic, Estonia, Portugal and Slovakia). Out of the four accounts reviewed, two have a small number of videos and do not post regularly. Portugal and Czech Republic are the only Beneficiary States that post videos regularly on their various programmes and the bilateral funds, as well as short videos from conferences. Most videos are available in Portuguese.

Twitter

Twitter is used by three Beneficiary States (Czech Republic, Portugal and Greece). Portugal with 751 tweets and Greece with 807 tweets so far are the most active. The tweets include, but are not limited to, information on activities, upcoming calls and events. They also retweet information for other relevant users (e.g. civil society organisations and foundations).

LinkedIn

LinkedIn is only used by Portugal and Greece. Posts are regular and similar if not the same as on other platforms. They include videos, events, information and pictures on the activities undertaken.

Stakeholders' feedback

According to the **interviews** carried out within country case studies, social media are an extremely important tool to promote and showcase the EEA and Norway Grants. All of the NFPs reported using many different channels: Facebook,

Twitter, Instagram, YouTube, and LinkedIn. However, this is not confirmed by our desk research described above. But the NFPs, which are state institutions, use not only Grants-related accounts (which were the subject of our desk research), but also generic ministry's account.

Stakeholders at programme level also reported that social media is an important channel to promote the Grants. The main channels used for dissemination by Programme Operatorss/Fund Operators are again Facebook, Twitter, Instagram, YouTube, and LinkedIn. In Poland, for instance, social media are often not managed by the teams working on the Grants, but by the general communication teams of these institutions (particularly, in the case of ministries, the official social media channels of these organisations are administrated by their communication departments). The FO uses both accounts set up specifically for the Grants and generic accounts of their institutions. Some evidence suggest that FO are actually more successful in their social media communication than other stakeholders. For instance, in Poland FO for the Active Citizens Fund – National has over 10,000 followers on Facebook and it also uses Twitter, Instagram and YouTube. The NFP, which covers all the other programmes, has over 6,000 followers and does not use other social media channels. In Latvia the situation is similar, and the Active Citizens Fund has over 1,200 followers on Facebook, whereas the NFP has below 800 followers. In Romanian both figures are similar.

The main activities of POs/FOs in social media include posts, stories, information campaigns, videos and events. Facebook events are created to support the launch of registrations for certain sessions or events (to enhance engagement), or to announce important news (for example, launching a call, publishing results of the evaluation, reminding about deadlines etc.). In some beneficiary countries, POs/FOs happen to share content posted by the Project Promoters in order to promote the funded projects.

Social media are also a priority channel for Project Promoters. The main platforms are the same: Facebook, Twitter, Instagram, LinkedIn and YouTube. PPs tend to not to have specific and dedicated channels to communicate the EEA Grants and, instead, use their generic accounts.

Efficiency: Communication processes and the use of resources

Which Beneficiary States have in place structures that guarantee efficient and effective implementation of their Communication Strategies and Plans? (EQ8)

Answer to the evaluation question

Beneficiary States do have the basic structures that guarantee implementation of their communication strategies and plans, i.e. Grants teams responsible also for carrying out communication activities. However, the study identified some limitations of these structures, which can affect efficient and effective implementation.

First, the findings suggest that significant share of staff dealing with communication of the Grants in the Beneficiary States do not have sufficient communication background and expertise, which can influence the effectiveness of communication activities undertaken (this issue will be discussed in detail below, within evaluation question 9).

Second, all but one communication strategy (Lithuania) includes an evaluation plan. However, the study suggests that existing evaluation measures across all Beneficiary States are insufficient for effective measurement of communication performance across Beneficiary States. Although most survey respondents reported carrying out monitoring and evaluation, it is difficult to confirm this in practice. It appears that by 'monitoring' they mainly mean monitoring of social media indicators reported by external subcontractors and in social media. Evaluations are foreseen at the end of the funding period. Communication strategies and plans focus on describing the activities rather than defining clear targets. Anecdotal evidence suggested that in some cases communication strategies may not be fully implemented (as suggested by stakeholders in the Polish case study). However, presentation of target performance indicators, if included in the strategies, is often fragmented and the monitoring mechanism do not allow to verify the efficiency and effectiveness of activities. In fact, the communication requirements from the Annex 3 oblige the stakeholders to plan for evaluation measures, but do not specify any details for implementing them and reporting on the findings. There is no consistent evaluation framework comparable between the Beneficiary States.

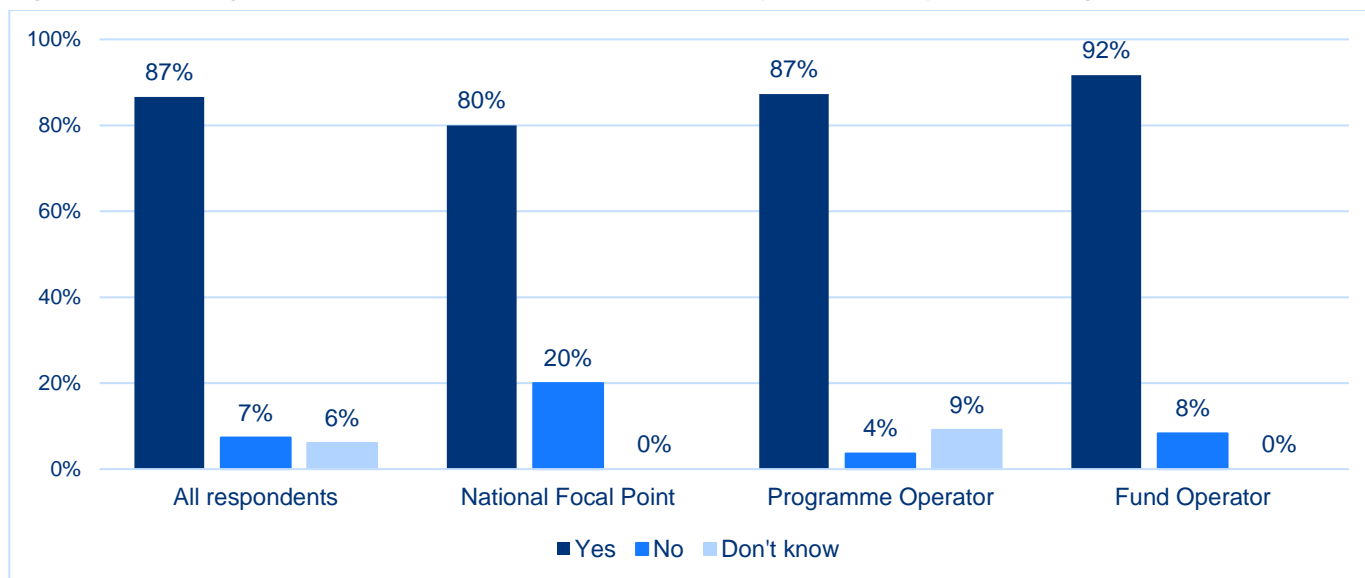
The study findings

According to **desk review**, all but one communication strategy (Lithuanian) includes an evaluation plan. However, in many other strategies significant progress could also be made in terms of defining measurement frameworks, including definition of indicators, targets and sources of evidence. There is no consistent evaluation framework comparable between the Beneficiary States.

Three quarters of communication plans reviewed by the study team indicate how the information and communication measures will be evaluated. However, the communication plans rarely offer a structured evaluation plan. Indeed, the evaluation measures are presented to a varying extent and the definition of targets, indicators and data sources and the link to the objectives are often insufficient. The indicators proposed are thus not always meaningful and do not cover all aspects of the communication activities undertaken.

According to the **surveys**, most respondents from the NFPs, POs, and FOs (87%, 71 out of 82 respondents who answered this question) indicated that they monitored and evaluated their communication activities. When broken down, we can see this proportion was particularly large among FOs (92%; 11 out of 12 respondents), followed by POs (87%, 48 out of 55 respondents), and NFPs (80%, 12 out of 15 respondents).

Figure 4: Monitoring and evaluation of communication activities by respondent type (percentages)



Source: Mid-term assessment survey

In terms of methods to monitor the progress and success of their communication activities to raise awareness of the Grants, the most frequently selected were:

- media monitoring (press, radio, TV)
- social media monitoring
- website analytics, such as Google analytics

However, half of all respondents (49%, 47 out of 96 respondents) did not indicate any of the available options.

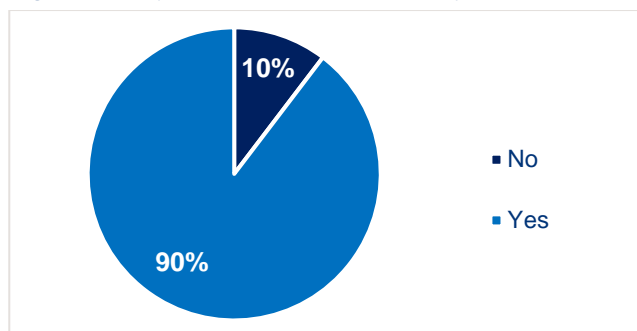
NFPs were also asked whether they set KPIs to measure the outcome of their communication activities. Respondents were split on this question, with 42% who indicated 'yes' (5 out of 12 respondents), and another 42% who indicated 'no'. 17% (2 out of 12 respondents) indicated 'don't know'.

The **case studies** further confirms that only the Slovak NFP carries out regular monitoring in line with the communication strategy. The Polish NFP only monitors effectiveness of the implementation of specific activities and campaigns carried out by external contractors (who are obliged to provide monitoring reports). Evaluation activities in Poland have not been carried out or planned so far, although the Communication Strategy stipulates that evaluation of communication activities should be based on annual reporting.

At programme level, the POs/FOs in Slovakian and Portugal – and to a lesser extent in Romania – developed extensive tools to monitor implementation of their Communication Plans. In two countries – Portugal and Romania – the NFPs also monitor the communication activities of the POs on an on-going basis, for instance by monitoring Projects' communication plans and monitoring of digital communication dossiers. Furthermore, in Portugal, awareness of the general public of the existence of the EEA Grants is assessed through regular surveys carried out by the NFP on communication activities for the Projects and Initiatives. However, the interviews with the Polish stakeholders show that the POs/FO have not developed any regular mechanism of monitoring the implementation of their communication plans.

As regards PPs, in the **survey**, nine out of ten respondents representing PPs confirmed that they monitor and evaluate their communication activities.

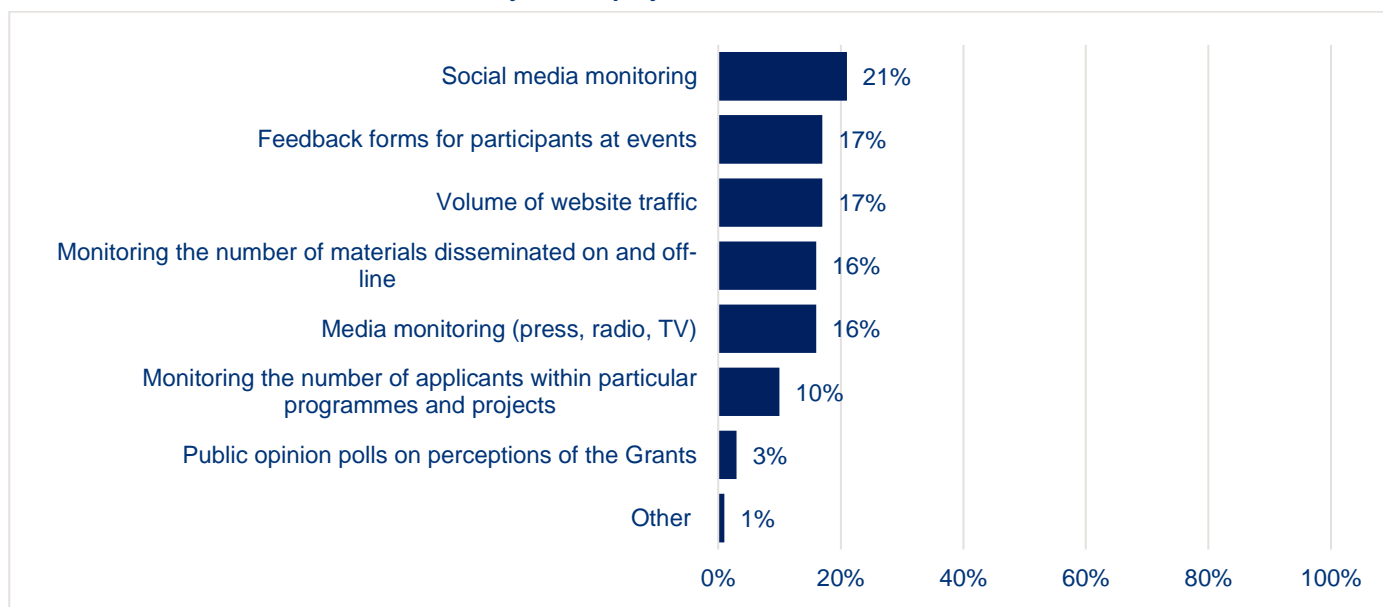
Figure 5: Do you monitor and evaluate your communication activities in EEA and Norway Grants projects? (n=222)



Source: Mid-term assessment survey

The most frequently selected monitoring tool was social media monitoring (selected by 21% of the respondents), followed by feedback forms, monitoring of website traffic, media monitoring and monitoring of other online and offline materials (all four selected by 16-17% of the respondents).

Figure 6: Please indicate if you use any of the below methods to monitor the progress and success of your communication activities in EEA and Norway Grants projects.



Source: Mid-term assessment survey

In the interviews carried out as part of the **case studies**, interviewees at project level did not confirm using comprehensive monitoring or evaluation frameworks to ensure the efficient implementation of their communication activities. In some cases, media monitoring is used.

What resources are allocated to communication: is there a dedicated /experienced and resourced communications team/person or merely a communications function? To which extent do these resources influence performance and implementation of the communication requirements? (EQ9)

Answer to the evaluation question

Stakeholders at country and programme level allocate 1-3 people to communication activities. PPs in most cases do not have specific people allocated to communication. About four in ten members of staff dealing with communication do not have previous communication background. This lack of specific expertise influences the effectiveness of communication activities undertaken, as well as training conducted in country on how to plan and implement communication activities.

The findings related to the assessment if the level of resources is sufficient are mixed. Some stakeholders in the interviews suggested that they do not have proper resources to implement efficient communication but this was not confirmed in the online surveys. But the evidence does suggest that staff involved in the Grants do not always have the relevant expertise in communication. Communication tasks for the Grants are not necessarily well integrated in the communication teams of those institutions. Ministerial communication teams tend to be disconnected from Grants' work. Communication about the Grants is implemented by staff dealing with the Grants rather than by communication teams. This is an aspect that warrants further discussion between the FMO and the National Focal Points, in particular as it implies that NFP's (but also POs) are limited in their capacity to implement creative and impactful communication because this is not their core expertise and they do not sufficiently benefit from the insights and skills of national ministerial communication teams. As independent organisations, Fund Operators generally have more freedom in their communication and, although they do not have the same level of support as the staff of ministries, they seem to be able to adopt more innovative and engaging approach to communication.

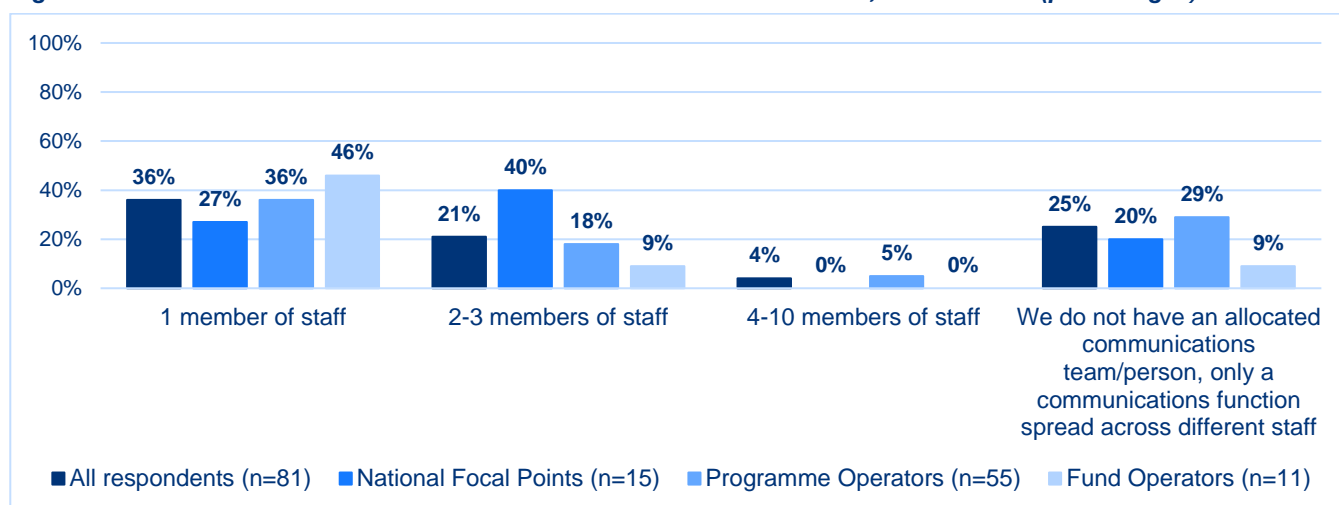
The study findings

The number of staff dealing with communication

According to the **surveys**, most organisations involved in the EEA and Norway Grants allocated between 1 and 3 staff members to communication-related tasks, but the detailed allocation varies between the categories of stakeholder.

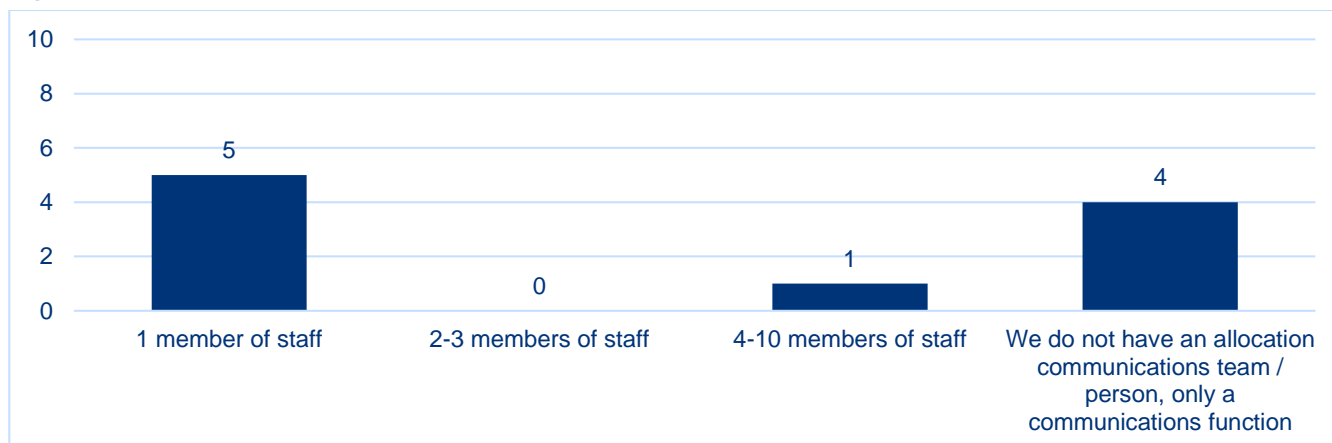
Most of NFPs reported having either 2-3 members of staff allocated to communication-related tasks (40%) or just 1 person (27%). In case of POs and FOs the opposite situation was reported: 36% of PO and 46% of FOs have only 1 person responsible for communication and 18% of POs and 9% of FOs have 2-3. A significant number of organisations do not have anyone allocated to communication about the Grants. In case of DPP, they either have 1 person allocated to communication (5 out of 10 responses) or do not have anyone (4 out of 10). The detailed results for country and programme-level organisations are presented in the figures below.

Figure 7. Number of staff allocated to communication-related tasks in NFPs, POs and FOs (percentages)



Sources: Mid-term assessment surveys

Figure 8. Number of staff allocated to communication-related tasks in DPPs (frequencies)

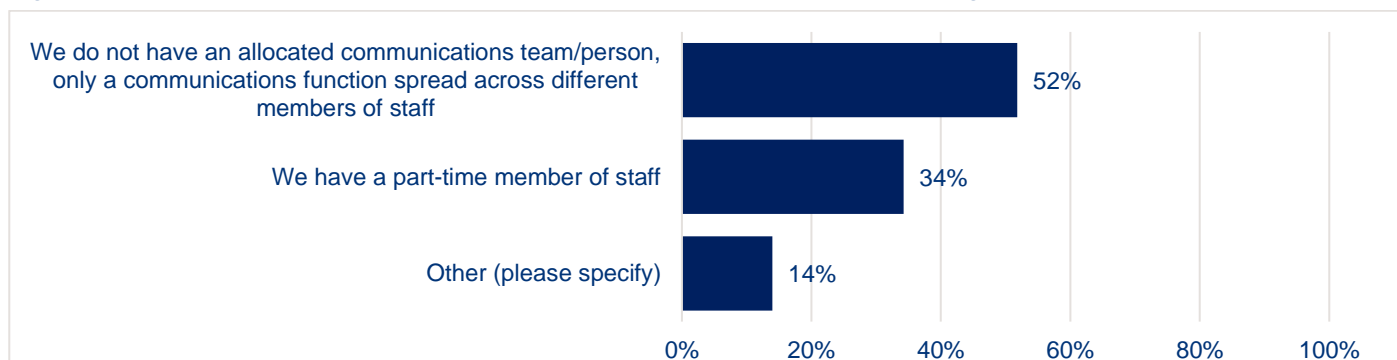


Sources: Mid-term assessment surveys

In case of PPs, the resources are more limited. Around half (52%) reported that they do not have a communication team/person but only communication functions spread across team members. One third (34%) have a part-time member of staff dealing with communication. The 14% of the respondents who selected the 'other' option provided further details:

- 35% of them stated they had one person in charge of communication activities. An additional 23% explained they had several members of their team supporting communication in addition to that one dedicated member of staff.
- 19% of these respondents had a communication team.
- 6% replied they had two members of staff in charge of communication and another 6% that they had three.
- The reminder of respondents had other arrangements such as the use of trainees for communication.

Figure 9. Number of staff allocated to communication-related tasks in PPs (percentage, n=223)



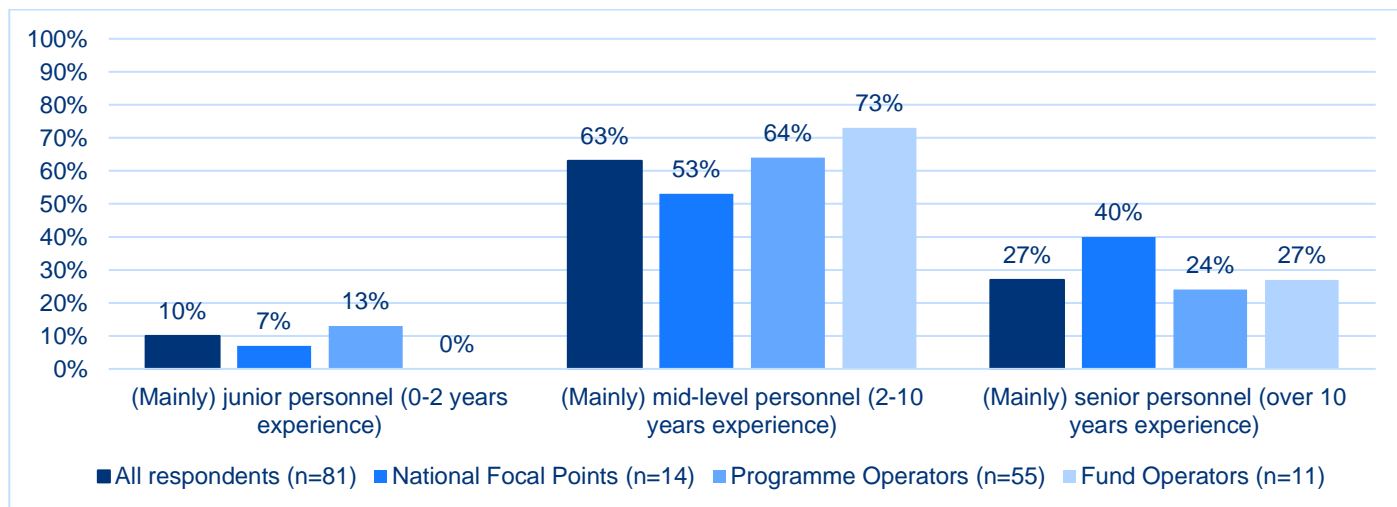
Source: Mid-term assessment survey

The findings provide mixed evidence if these resources are sufficient. In the survey of NFPs, POs and FOs, the factor rated as having most limited communication results across all respondents was the amount of human resources (2.6 out of 5.0 - with 1.0 meaning strongly limiting and 5.0 strongly enhancing), which was also rated as most limiting by all respondent types, compared to other factors. This was also raised in some **interviews** (but not all of them) in the **case studies**. However, the survey result was still close to neutral answer, suggesting that it was neither limiting not enhancing it.

Profile and background of staff engaged in communication

On the profile of staff engaged in communication-related tasks, most survey respondents from the NFPs, POs and FOs reported that they were (mainly) mid-level personnel with 2-10 years of experience (63%, 51 out of 81 respondents who replied to this question). This was the case also within each respondent type.

Figure 10. Profile of staff engaged in communication-related tasks in NFPs, POs and FOs (percentages)



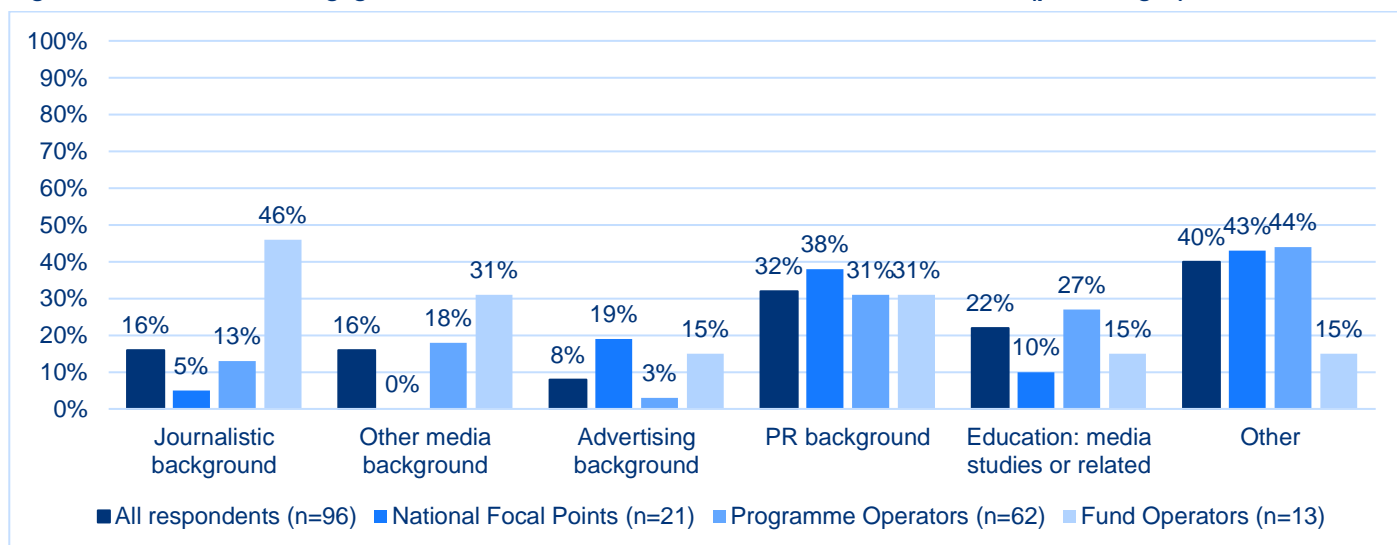
Source: Mid-term assessment survey

Similar answers were provided by DPPs. Most of them reported that their communication staff was (mainly) mid-level personnel with 2-10 years of experience (n=6 out of 10 respondents who answered this question). The remainder indicated mainly senior personnel (over 10 years' experience) (n=4).

On the professional background of staff engaged in communication-related tasks, many of them do not have communication related background. In the survey of Beneficiary State actors, four in ten respondents from NFPs, and POs selected 'Other' and mentioned various fields, such as social sciences, public administration and international relations. Some respondents cited a PR background (38% of NFPs and 31% of POs), advertising background (19% of NFPs) and communication-related education background (27% in case of POs and 10% in case of NFPs). But altogether, in this multiple-choice question, around half of respondents (49%) didn't pick up any of the communication-related backgrounds listed, including 52% in case of NFPs and 50% in case of POs.

Fund Operators' team tend to have more communication background. Most of respondents selected journalistic or other media background (46% and 31%) or PR background (31%). Only 15% selected 'Other'. The details are presented in the figure below. Altogether, in this multiple-choice question, 31% of Fund Operators didn't pick up any of the communication-related backgrounds listed.

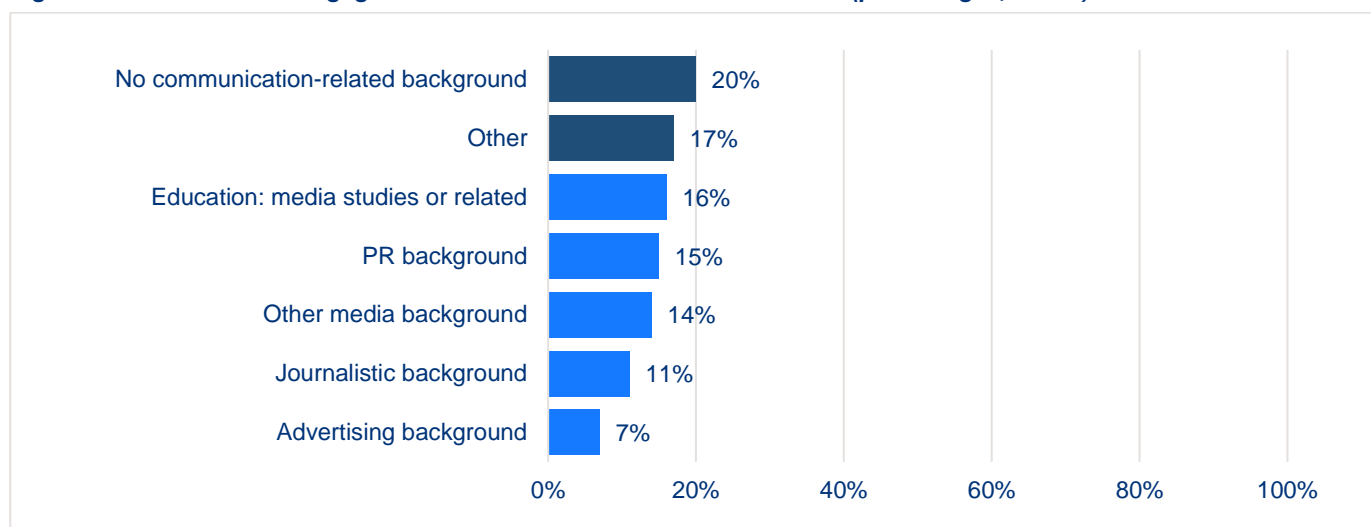
Figure 11. Profile of staff engaged in communication-related tasks in NFPs, POs and FOs (percentages)



Source: Mid-term assessment survey

In case of PPs, most of the staff engaged in communication-related tasks within the Grants (63%) had communication-related backgrounds, according to the survey results. This included media studies (16%), PR (15%), other media background (14%), journalistic (11%) or advertising (7%) background. Only 20% had no communication-related background. Among the respondents who selected the 'Other' option, most also referred to a non-communication background.

Figure 12. Profile of staff engaged in communication-related tasks in PPs (percentages, n=219)



Source: Mid-term assessment survey

Overall, the results suggest that about 50% of NFPs' and POs', 40% of PPs' and 30% of FOs' members of staff in organisations dealing with the Grants do not have previous communication background. This highlights the importance of providing them guidance in communication, either in a form of training or guiding documents.

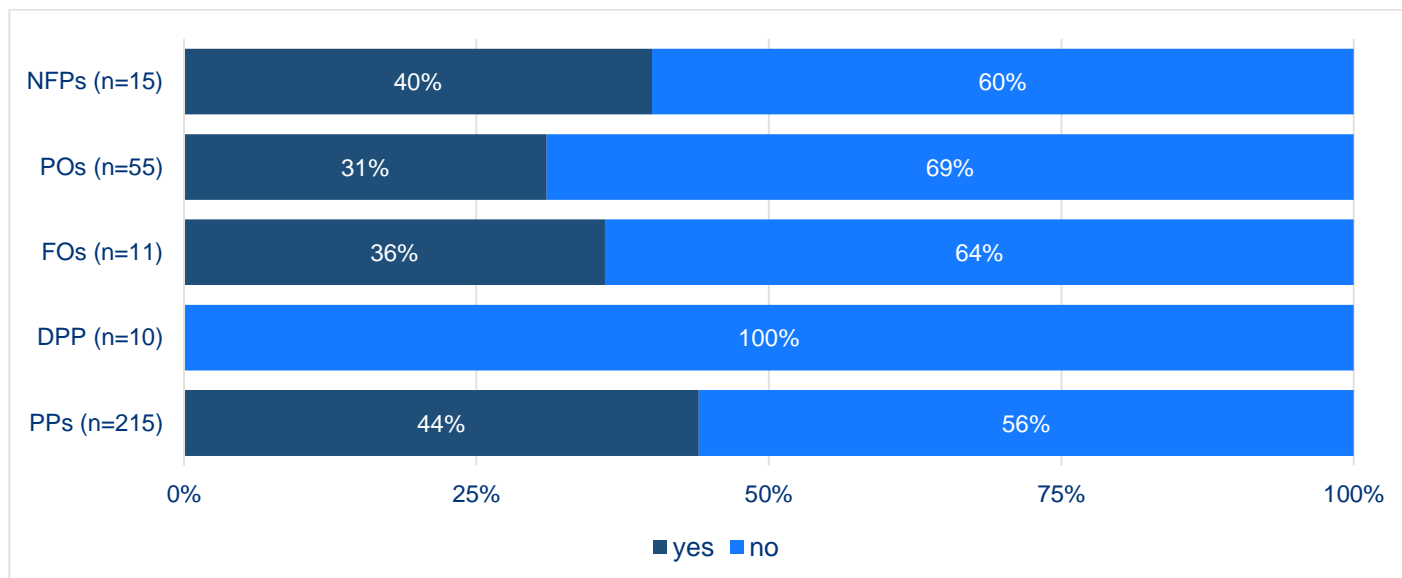
According to **case study** findings, the NFPs employ members of staff who work on communication, although this is not usually their sole responsibility. In Romania, for instance, there is one person designated as communication officer for the Grants, supported by POs and NFP management who are also actively involved in communication activities, such as social media posting, publishing press releases / announcements on the website, helpdesk management, etc. In Poland, according to the interviewed officials, there are about seven people working in different part-time roles, which equate to 2.68 of full-time equivalent. In Slovakia, the NFP reported two members of staff (full time equivalents) dealing with EEA and Norway Grants communication. One of them spent about half of the time on communication and the other about 20-25%. There is also a part-time employee, mainly dealing with formal issues, but also with some communication responsibilities (creating visuals, webpages). And in Portugal, the NFP has one member of staff dedicated exclusively to communication, who is supported by another person when needed. All in all, the number of people working the Grants' communication in the beneficiary countries does not exceed 3 full-time equivalents. Typically, they do not have specific background in communication.

Only NFPs in Poland and Slovakia hire external contractors, and then only to a limited degree.

Allocating a specific share of management costs to communication

Most of respondents to all surveys reported that they do not allocate a specific percentage of management cost to communication activities. This included all DPP which contributed to the survey, 69% of POs, 64% of FOs and 56% of PPs. In case of PPs, only in Portugal, did the majority of respondents confirm allocating a specific percentage of their management costs to communication.

Figure 13. Share of respondents reporting allocating a specific share of management costs to communication activities



Source: Mid-term assessment survey, created by the study team

The result for NFPs is quite surprising, given that the NFPs have their own budget for communication activities. For that reason, we consider that the question might have been misunderstood by the respondents from the NFPs.

Donor embassies

The extent that different Donor State authorities engage with other Grant communicators relates to their capacity and the amount of contribution to the Grants. Liechtenstein has no engagement with communicators in the Beneficiary States. The Icelandic MFA engages with National Focal Points, via bimonthly meeting with the communications network organised by the FMO. Meanwhile, Norway is supported by a network of embassies in each Beneficiary State, which all engage in supporting communication on the Grants.

Norwegian embassies are relatively small and staff rotations can make coordinating their work somewhat challenging, but they are considered to be relatively skilled in communication and benefit from insights from local staff. Whilst embassies have limited resources, meaning that not all good ideas can be turned into activities, some embassies are particularly effective. Portugal, Greece and the Czech Republic were highlighted in the study. The embassy in Portugal takes a thematic approach on oceanic research and focusses on the business community. From an embassy perspective, the Grants are viewed as a foreign policy tool; a way to highlight the importance of Norway as a partner.

Which, if any, efficiency gains are to be made, both within the FMO and through the Guidelines/Manuals issued by the FMO, based on learning from communication practices of other comparable organisations? (EQ10)

Answer to the evaluation question

The study did not confirm that there are efficiency gains to be achieved within the FMO and through the Guidelines/Manuals issued by the FMO in terms of reduction of costs. However, it does suggest that there are areas where the effectiveness can be increased (it would increase the efficiency, understood as relation between costs and benefits, keeping the costs at the same level, but increasing the benefits).

Comparative analysis of the FMO's communication requirements and approach with other international organisations suggest that efficiency gains could be made in providing stakeholders with more support and guidance in designing, implementation and measuring the performance of their communication activities. This could help improve effectiveness of communication. Another element offering potential efficiency gains is development of networking in the Beneficiary States, which both benchmarked organisations put emphasis on. The study suggests that there is room for more structured cooperation between communication teams of the NFPs and POs.

The study findings

The **benchmarking exercise**, which involves a comparison between the FMO approach and the approach taken by DG REGIO and the World Bank, highlights differences between the amount and type of requirements and guidance at each level. This raises questions as to the extent that effectiveness could be maintained if some aspects, which are currently included in Annex 3, were instead provided as guidance only. For example, the FMO could consider developing ways to better support stakeholders' communication, especially those below NFP level, by, for instance, preparing similar guidelines, which could be translated and transferred to PPs. This could increase the effectiveness of communication about the Grants in the Beneficiary States.

Both benchmarked organisations put emphasis on networking and connecting communication staff in different organisations through a community of practice to share ideas and best practice. Effective communication is facilitated in DG REGIO by establishment of an expert communication group in which communication leaders from beneficiary countries share experiences and provide peer to peer support. The FMO has also created a network of communication officers, but only at the NFP level. DG REGIO also encourages creating country communication networks, which in case of the FMO could comprise of communication staff from the NFP (as a lead), POs, FOs, and potentially also the Donor State embassies. These networks could share knowledge, coordinate activities and even organise joined training.

When it comes to centralised communication tools, both DG REGIO and the World Bank provide potentially useful examples of communication tools at different levels, to different audiences, with different levels of detail.

It is suggested that the FMO reflect upon the way that projects and programmes are presented online and the extent that this can be enhanced / made more interactive to allow users to tailor their information choices. Some of these could be adopted by the FMO to strengthen in central communication:

- 1) An integrated financial portal, such as DG REGIO's Cohesion Data portal¹⁴, provides the necessary overarching financial summary, also supporting both communication (it can be useful, for instance, for journalists), but also transparency. The FMO published information about financial allocations, but not about spending and the data is not integrated into a single reporting page.
- 2) Different types of project briefs, such as World Bank's Results Briefs¹⁵ and Results that Change Lives series¹⁶, provide examples of PR-oriented materials to reach audiences beyond those that access technical reports. These illustrated materials using elements of storytelling can be useful to present projects to the public. In case of the FMO, which publishes project stories in news section, it could also consider creating a separate section of the website to publish them to distinguish between different types of content, such as news, project stories and perhaps also documents. It could also be considered if these briefs should be published in English only or also in local languages.

¹⁴ <https://cohesiondata.ec.europa.eu>

¹⁵ <https://www.worldbank.org/en/results>

¹⁶ <https://www.worldbank.org/en/what-we-do/changinglives>

- 3) Use of scoreboard cards¹⁷, similar to those used by the World Bank, or other engaging way to provide a visual and quick snapshot of how the Grants have met their KPIs and are contributing to the overarching objectives of the grants.

Overall considering the above suggestions, key questions remain relating to how to resource any changes made and the balance between expecting programmes and projects to generate content and the FMO's centralised role in this process.

What is the quality, the usefulness and the need of the communication workshops and trainings provided by the FMO? Are there more efficient formats or systems to be put in place? If so, which ones? (EQ11)

Answer to the evaluation question

The study confirmed that workshops and training provided by the FMO are useful and needed, but they mainly reach stakeholders at national level. There is room to provide more training in communication to POs and FOs as well PPs, not necessary by the FMO, but by each one-up level stakeholder. However, the level of communication expertise will influence the capacity of each stakeholder to provide training. Currently, POs and FOs are not offered many training opportunities or other support from the NFPs and PPs are not offered many training opportunities by POs.

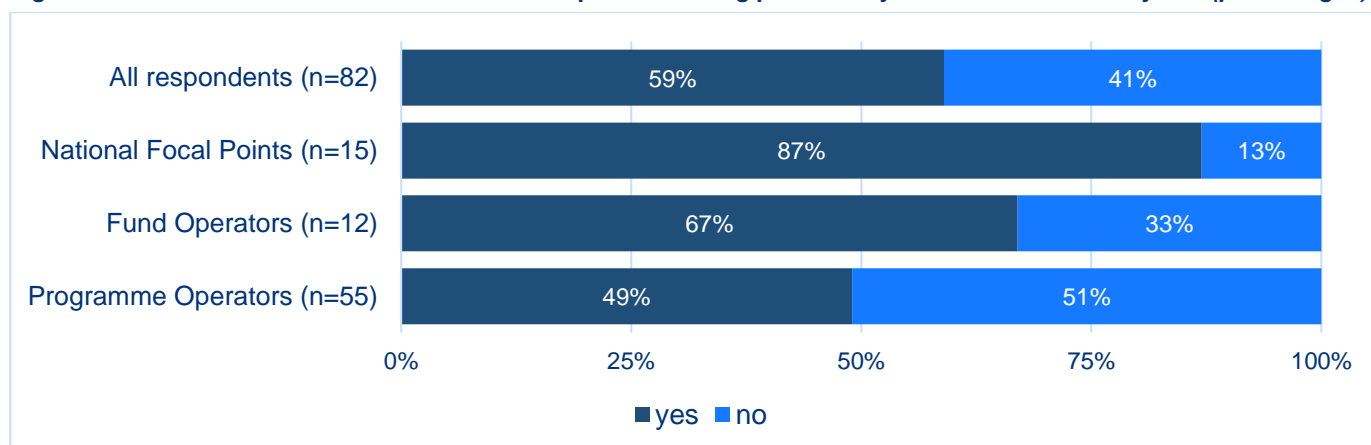
The pandemic created many challenges to stakeholders involved in the Grants, but it simultaneously generated opportunities. In case of the Grants, FMO's experience with workshops and training could be replicated at lower levels and in local languages. NFPs could organise training for POs and FOs, which could organise similar ones for PPs. An online format would be more efficient and inclusive, in particular for organisations from remote locations. This would also strengthen cooperation and knowledge sharing between stakeholders involved in the Grants in a particular country.

The study findings

Workshops and training

Most of respondents representing the NFPs and FOs confirmed in the **survey** that they had participated in communication workshops and training provided by the FMO in the last 5 years. In case of NFPs, almost nine in ten respondents confirmed it, in case of FOs – almost seven in ten. In case of POs, around half reported not attending FMO's workshops and training (51%), as presented in the figure below.

Figure 14. Attendance at communication workshops and training provided by the FMO in the last 5 years (percentages)

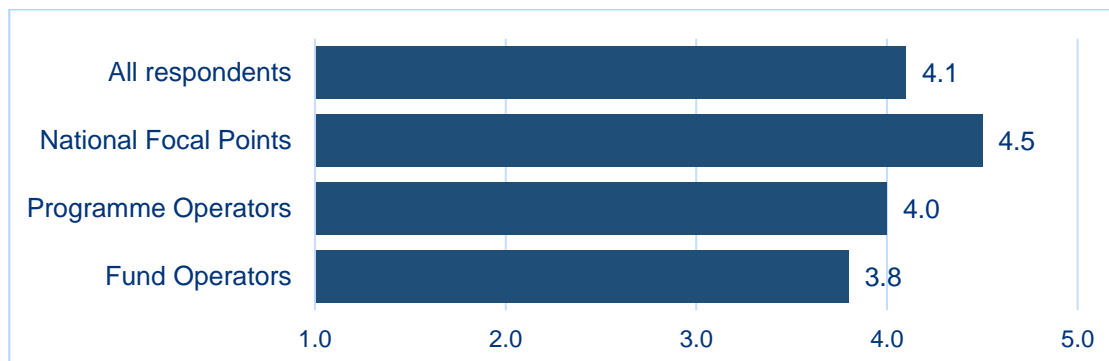


Source: Mid-term assessment survey, created by the study team

¹⁷ <https://scorecard.worldbank.org/>

On a scale of 1 (not at all) to 5 (to a great extent), respondents indicated that they found the workshops and trainings useful with an average score of 4.1. NFPs scored the usefulness of the workshops and trainings particularly high (4.5 out of 5.0), compared with POs (4.0 out of 5.0) and FOs (3.8 out of 5.0).

Figure 15. Extent to which respondents found the workshops and trainings useful (mean values)



Source: Mid-term assessment survey

Findings from the **case studies** generally confirmed these findings. All the NFPs from the five Beneficiary States attended FMO workshops and regarded them as high-quality and useful. They also suggested that more regular workshops and training should be organised in the future. Some POs also confirmed attending the workshops. Those who did it, were generally satisfied with the quality of training they received from the FMO and would be willing to participate in additional communication workshops. However, some POs also highlighted that they would like to be provided with more guidance and training opportunities by the NFPs of their respective countries.

Also, some FOs suggested that they should be provided with more training opportunities by the NFPs. They highlighted that although they are not formally supervised by the NFPs, they have common objective of promoting the Grants and funding opportunities.

Naturally, the representative of the PPs interviewed within the study did not participate in communication workshops or training organised by the FMO. But in some cases, they also indicated that more guidance and training opportunities should be offered to them.

Generally, the study suggests that the guidance provided by the FMO is valued but it mainly reaches the top-level stakeholders (the NFPs), and the NFPs themselves do not always provide enough support in communications to organisations below country level.

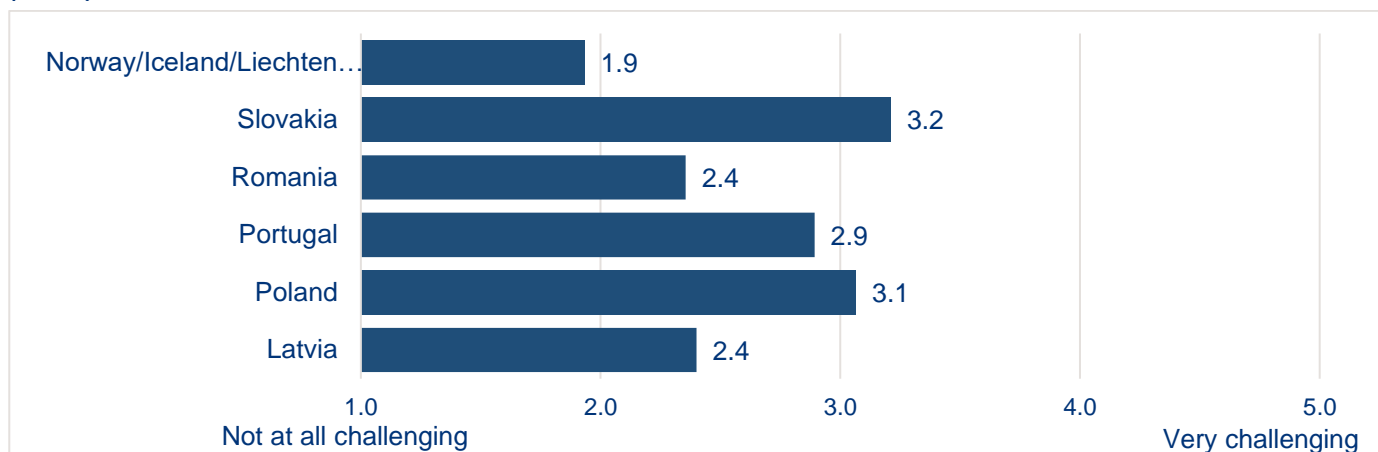
Communication and Design Manual

Apart from workshops and training, another form of supporting stakeholders' communication activities is through providing them with guidelines, such as Communication and Design Manual.

The respondents rated the Manual high. On a 5 grid scale, respondents from the Beneficiary States assessed it between 4.3 (NFPs, POs, FOs) and 4.5 (PPs), so between 'rather useful' and 'very useful'. Only Donor project partners rated it 3.7, which is between rather positive and neutral.

In general, the respondents did not consider the fact that the Manual was only available in English challenging, with a mean value of 2.5 out of 5.0, i.e., below neutral level (which is 3.0). It was, however, considered slightly more challenging in Slovakia and Poland, with mean values slightly above – but still close to – a neutral score. This was considered the least challenging among Donor project partners.

Figure 16. Mean values for responses if it is a challenge that the Communication and Design Manual is in English? (n=281)



Source: Mid-term assessment survey, created by the study team

Although in general it was not found challenging, it was for some organisations. Therefore, in Portugal the was translated to Portuguese by the NFP (*Manual de Comunicação e de Normas Gráficas*), with a view of supporting these PPs. In the interviews in Portugal, it was assessed as very useful. The FMO and the NFPs could consider translating the Manual to all 15 Beneficiary States' languages.

How, and to what extent, is the FMO facilitating communication about the Grants in the Donor States? How could this be improved, both in terms of its formal set-up and content? (EQ12)

Answer to the evaluation question

The study suggests that the FMO's role in facilitating communication about the Grants in the Donor States is limited, as its mandate is focused on communicating towards audiences in the Beneficiary States, as well as international audiences.

However, this does not mean that there is no interest in the Donor States in further support from the FMO, both in the Ministries of Foreign Affairs of the Donor States and in the DPPs. There is an interest in the FMO developing more communication materials / content / messages / success stories that could be relevant to communication in the Donor States. Where possible, these should be translated and in editable formats to allow Donor State authorities to further adapt to their target audiences. The FMO's capacity to respond to this interest by the Donor States relates to its mandate and its own levels of resourcing, communication priorities and defined roles and responsibilities.

There is also scope to support more structured brainstorming and sharing of good practices between Donor State communicators, which would support a more joined-up approach to communication. When looked at as a whole, there is a fragmentation of communication budgets and key actors and this implies that there is scope for more sharing of ideas and re-purposing of content, as well as coordination around key themes.

The study findings

Feedback from DPPs

According to the **interviews** with the DPPs, the FMO supports donors' communication through meetings, training sessions and workshops that are organised to provide the right communication tools. The interviewed DPPs regarded them as useful and beneficial. However, most of the representatives of the DPPs interviewed within this study considered that they do not receive "adequate" assistance from the FMO. Many DPPs highlighted they would welcome more workshops and the exchange of best practices as well as more training on communication.

They believed that the FMO should provide them with more support in terms of communication training, sharing of resources (templates, information on the results of projects) and good ideas/practices. Some of them suggested that their staff are not experienced in communication, hence they would consider the FMO's support useful and necessary. However, the Norwegian Ministry of Foreign Affairs plays a proactive role in supporting DPPs' communication efforts. According to many Norwegian DPPs, they currently receive all the necessary training in communication and assistance

from the Ministry. Moreover, the Ministry organises regular meetings that aim to coordinate the activities of the DPPs. DPPs which cooperate with the Ministry tend to regard the FMO's assistance as much less necessary. In fact, the only support they consider important is promotional content (e.g., photos) about the implementation of the projects. Some of the DPPs also mentioned that geographical proximity makes cooperation much easier, hence their preference to work more closely with the Norwegian Ministry of Foreign Affairs.

Feedback from Ministries of Foreign Affairs

The representative of the Ministries of Foreign Affairs of the Donor States assessed the quality of FMO-produced content and materials and considered them to be high. FMO support to communication stakeholders through training and workshops is well received. The option of running these digitally has opened up the possibility for greater flexibility.

There are several areas where more FMO and/or expert support may be required and these include:

- how to define target groups / to what extent the general public should be targeted in the Beneficiary States
- what and how to measure communication effectiveness
- how to increase the reach of communication activities
- additional success stories for the Donor States

The newly adopted FMO Communication strategy defines the FMO's role and level of service to the Donors. This includes:

- close cooperation and exchange of information with the Donor States, including giving early notice on planned online and offline communication activities
- assisting the Donor States and their Missions and Embassies in their communication work and supporting their efforts in bringing visibility to the Grants
- suggesting to the Donors communication activities directed at target groups in Donor States and support them in these

Feedback collected before adoption of the strategy suggested that supporting more advance planning around key communication dates is one aspect that could be reinforced. The FMO put in place a monthly social media heads-up, as well as regular meetings upon request with updates on the planned communication activities.

Broadly, the feedback confirmed that it was clear for the representative of the Ministries what the communication roles and responsibilities in the EEA and Norway Grants are and this is strengthened through the level of specificity in Annex 3 (although this may limit some communicators creativity). According to the representative of the Ministries, however, there is scope to streamline the approach to communication strategies, which are perceived to be too long and not sufficiently precise. There is also scope to better define expectations for DPP communication, given the low levels of engagement of DPPs in communication and reported low levels of awareness of their communication activities.

How is the FMO reaching out to potential project promoters in the Beneficiary States and to the potential project partners in the Donor States? How could this be improved? (EQ13)

Answer to the evaluation question

It is difficult to assess if the FMO is reaching out successfully to project promoters in the Beneficiary States and potential project partners in the Donor States in any consistent and effective way, even if it is acknowledged that FMO content and tools are of a high professional standard.

The FMO makes information available to potential beneficiaries via its regular channels, i.e., the EEA and Norway Grants website, the FMO newsletter and the social media. This central communication has a professional look and feel and ensures consistency in messaging for these audiences. But there is a lack of evidence as to the extent that potential PPs actually engage with FMO tools or instead tend to engage with contacts in their own country. This also holds true for the Donor project partners. The fact that FMO's central communication is carried out in English rather than in any of the 15 languages of the Beneficiary States or the three languages of the Donor States is likely to play into this. In consequence, it has limited potential to reach PPs or Donor project partners.

However, different stakeholders within the FMO 'family' have different communication roles. Our understanding is that the focus of FMO communication activities relates to coordination and support at national level in the Beneficiary States, as well as communication towards the Donor States and the wider EU institutions. **This being the case, and given the finite resources of the communication team within the FMO, the central question is perhaps not how FMO's communication to potential PPs and Donor project partners should be improved, but if it needs to be improved. Communication by NFPs, POs and FOs in the Beneficiary States, and Foreign Ministries and DPPs in the Donor States remains key to reach and engage potential grantees. The FMO's role in improving overall communication is in encouraging and guiding its improvements from other actors in the communication network.**

The study findings

The **case study** findings confirm most of the interviewees were not able to provide meaningful feedback about the ways the FMO reaches out to potential project promoters in the Beneficiary States and to the potential project partners in the Donor States, nor how this could be improved. The Portuguese interviewees considered the FMO website to be of low utility and not regularly updated. They suggested that in the case of Portugal-related content, information is not up to date. Furthermore, the Polish stakeholders consulted within this study at both country and programme levels were not able to make an assessment or express opinions about the effectiveness of this dimension of communication on the Grants. In the interviews, they tended to focus on communication carried out by institutions in Poland. The team did not manage to collect information on the FMO's reach in Slovakia.

Many international stakeholders consulted within this study, such as embassies, IPOs, or Ministries of Foreign Affairs, gave a very positive assessment of the FMO communication effort. They described it as professional and of high quality. One interviewee also highlighted an efficient transition to online communication, mainly in social media, necessary due to the pandemic.

The **interviewees**, all of whom work in an international environment, also highlighted some challenges that their organisations, as well as the FMO, face. In particular, they were of the view that it is easier to publish success stories or information about the launch of new programmes or calls for projects at national level, but this kind of communication is not relevant for wider international audiences. This challenge was also linked to the FMO central communication, which needs to have a clear definition of who its target audience is, the international community or beneficiaries of the Grants in Beneficiary States. The newly adopted FMO's Communication Strategy actually includes both of these audiences: potential project promoters and project partners and the international community (EU institutions and relevant Brussels-based actors). However, as discussed above, it is doubtful to what extent the FMO's central communication in English really have a potential to reach potential beneficiaries in the Beneficiary States.

Coherence: Compatibility of different communications

To what extent does the FMO's current role as an enabler of a central communication network improve the communication in the broad Grants' environment (i.e. involving all actors)? If there are shortcomings identified, how can the FMO become the central facilitator for the Grants' communication network? (EQ14)

Answer to the evaluation question

The definition of enabler was not specified in the question, but the evidence does not seem to confirm that the FMO plays the role of enabler of communication in the Beneficiary and the Donor States. The FMO supports communication. It created a network that facilitates communication about the Grants, coordinates the NFPs and sets the framework. The FMO's activity in this area is assessed as very useful, but its role is more indirect. It cannot have specific influence on communication activities on the ground.

Nonetheless, this study suggests that there are several aspects that could be reinforced to improve the FMO's facilitation role, these include:

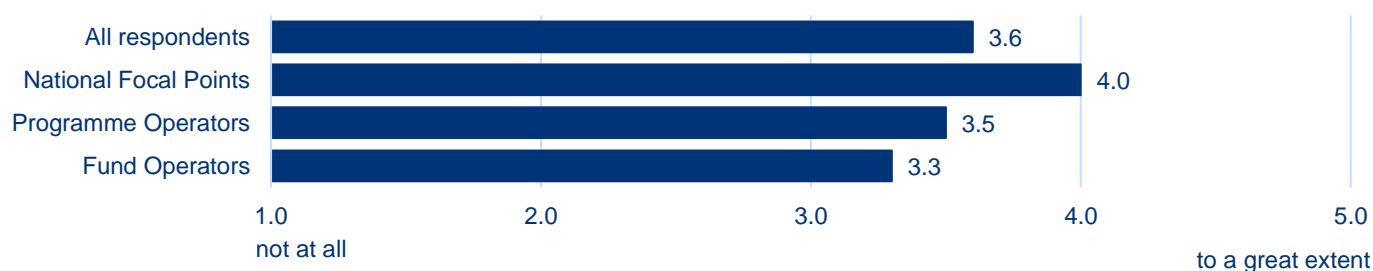
- a lack of template for communication strategies and plan and guidance on setting communication targets and budgets;
- not defining the required level of expertise of persons responsible for communication in the NFPs and below that level;
- not guiding stakeholders' (mainly NFPs') activity on social media.

But it also suggests that there is a need to clarify the FMO's role and the extent that it can be an enabler or facilitator of the communication in the Beneficiary and the Donor States to ensure a common understanding and expectations among stakeholders.

The study findings

In the **survey**, respondents from NFPs, POs and FOs tended to agree that the FMO had managed to create a network that facilitates communication about the Grants involving all of the actors. On a scale of 1 (not at all effective) to 5 (effective to a great extent), respondents reported an above-average score of 3.6. This score was particularly high among NFPs (4.0 out of 5.0). For POs (3.5 out of 5.0) and POs (3.3 out of 5.0) it was closest to neutral level (3.0).

Figure 17: Level of agreement that FMO had managed to create a network that facilitates communication about the Grants (mean values)



Source: Mid-term assessment survey

Consultation with stakeholders carried out within the study, mainly in the **case studies**, suggest that the FMO's activities to support communication are valued by stakeholders. They value both the central FMO's communication activities (including for instance the newsletter, social media and the website), and the workshops and training provided to the NFPs.

However, the consultation also suggests that the expectations of stakeholders are high. DPPs and POs, when asked about the FMO's role, ask for more support, training and guidance, although – as discussed with the FMO – this is not necessarily its role. The discussions at the **workshop with the FMO** confirmed that the FMO focuses on coordinating the network of stakeholders at national level, that is the NFPs. It is the responsibility to the NFPs to supervise and guide POs – and the POs' responsibility to supervise and guide PP. The FMO provides workshops, and training to the NFPs – and this is deemed helpful – but it is the NFPs who should provide similar support to stakeholders below national level. There are certainly limits to the extent to which the FMO can facilitate communication in the Beneficiary and the Donor States, because it cannot influence it directly. Rather, it sets the framework and requirements and provide guidelines.

Interviews with representatives of the Ministries of Foreign Affairs also suggested that there is scope for the FMO to consider how different communication stakeholders feed into the communication approach on the Grants. One specific suggestion was that the FMO could consider providing a forward promotional plan, including international days, for example Human Rights Day, to allow different communication actors in the Donor States and Beneficiaries States to take a more coordinated approach. This could also allow the FMO to provide support by developing thematic materials, which can be adapted in advance and rolled out in tandem on relevant dates. This would allow the FMO and all communication partners to consolidate their communication efforts in a more planned way.

Overall, there is an interest in the FMO facilitating communication in the Donor States, confirmed both by the ministries and the DPPs. This could include developing more communication materials / content / messages / success stories that could be relevant to communication in all three Donor States.

The **expert's advice** collected within the study further suggests that there are several shortcomings in facilitating Grants' communication within the network by the FMO. One of the issues is that the FMO does not provide templates for the communication strategies and plans. It does provide a list of requirements, but a more detailed template should provide detailed guidance, including how to split the budget for communication activities and how to set communication targets at output, outcome and impact level. It is crucial that the targets of the FMO and other stakeholders do not focus on *visibility* of the Grants. Visibility is simply placing messages in media through ads, publicity, billboards, posts etc (i.e., output level). There is no guarantee that these messages are seen or heard by the relevant audience (outcome level) and or that they had any influence on views /actions (impact level).

The other shortcoming is related to the fact that the FMO requires stakeholders to designate one person responsible for communications, but it does not require this person to have specific communication expertise or background. As a result, as discussed above (**EQ 9**), about four in ten members of staff dealing with communication do not have a previous communication background. This lack of specific expertise influences the effectiveness of communication activities undertaken.

Finally, the **validation workshop with the FMO** confirmed that there is some lack in clarity of the objectives of the FMO's communication. Such a clarification of these in the FMO's Communication Strategy would make clear what exactly it expects to achieve and how much resource can be allocated to facilitating communication about the Grants in the Beneficiary and the Donor States.

To what extent are the communication outputs, outcomes and intended impacts of the FMO and other actors (Donor states' Embassies, National Focal Points, Programme Operators, Project Promoters and their Donor state counterparts: Donor Programme Partners and Donor project partners) mutually reinforcing in the Beneficiary States and Donor States? (EQ15)

Answer to the evaluation question

The phrasing of this question is quite theoretical given that the outputs and outcomes of FMO communication as well as those of other communicators do not appear to have been clearly defined, these types of results are by nature intangible and their measurement needs to be planned upfront prior to the roll-out of communications. There is a lack of evidence relating to these aspects in this study. Evidence of these types of results is not consistently defined, collected and reported and cannot be assessed ex post without this. Perhaps the key issue here is rather whether key stakeholders working to communicate about the Grants in the Beneficiary States and Donor States are able to use the communication tools provided by the FMO and by each other to reinforce their own communication about the Grants.

The evidence suggests that there is very limited sharing of content about implemented projects. There are several reasons for this, including the lack of relevance of specific content to other stakeholders' communication efforts, issues relating to language and the fact that it is not possible to tailor ready-made content provided by others to specific target groups, as well as timing and availability of content.

However, whilst sharing between countries seems to be very difficult, it is possible that there could be greater harvesting of communication stories relating to projects implemented within countries. It was not possible to assess this aspect at the time of this review as many projects were in the early stages of implementation. Perhaps if the projects produce more outputs at the later stages of their implementation, it will be easier to share relevant content between different stakeholders.

The study findings

The **case studies** did not provide meaningful feedback about coherence of communication outputs, outtakes and outcomes between the Beneficiary and the Donor States. Individual case studies gave mixed assessment. For instance, in Poland, the feedback suggests that the NFP and the Norwegian Embassy in Poland¹⁸ do not coordinate their communication activities, which resulted in some overlaps, e.g. publishing similar videos on similar topics by the two institutions.

On programme level, there are some anecdotal examples of coordination of communication efforts between the POs/FOs and the NFP. The NFP shares information provided by POs/FOs about the Grants (e.g., about open calls) through its own communication channels. Concerning the DPPs, while they usually work very closely with POs/FOs in managing the programmes, their own target groups and communication goals are vastly different. The DPPs primarily aim at reaching out to institutions that could be interested in cooperating with partners from the Beneficiary States. They are also concerned with how the public in the Donor States perceive the Grants.

We collected some anecdotal evidence about sharing content about project implementation between POs and DPPs, but this does not seem to be a very frequent practice, at least, at this stage of the implementation of projects. However, some of the DPPs mentioned that they did indeed receive content (e.g., photos, descriptions of project implementation) from the PPs that they could later use to promote the Grants.

The PPs did not mention any coordination of communication efforts with Donor project partners.

¹⁸ Norway is the only Donor State which has embassies in the Beneficiary States.

Which elements of cooperation among the different actors need to be improved? Are there any good practice examples of cooperation that builds synergy? (EQ16)

Answer to the evaluation question

Generally, the study did not identify any significant issues in cooperation among the different actors involved in the Grants but identified some areas where improvements are possible. However, there seem to be some minor issues in certain areas and in selected countries. Despite no major issues, there is always scope for improvements to be made and the benchmarking and case studies highlighted some possible options for improvement.

For instance, there seem to be some lack of clarity on the level of desired and possible support provided by the FMO to the Donors' Ministries of Foreign Affairs. Based on the interviews with the FMO and the Ministries, we consider that this is largely related to the difference in perspectives on the Grants at the Ministries and the FMO. For the Ministries, the Grants are mainly an element of foreign policy, used to promote the Donor States. The FMO, although it is supervised by the Financial Mechanism Committee (FMC), which consists of representatives from the MFAs, implement the Grants, which have slightly narrower aims. These are: to contribute to the reduction of economic and social disparities in Europe and strengthen bilateral relations. We consider that adopting the new FMO's Communication Strategy would help clarify the roles and responsibilities (the feedback from stakeholders was collected before the strategy was adopted).

There is also room to improve cooperation at country level. In some cases, the cooperation between the NFPs and the embassies could be strengthened.

Although the NFPs seem to work closely with the POs, there is also room for more support in communication from NFP to POs, as already discussed in other sections. There are examples of building the efficiency of cooperation between stakeholders at country level. It is mainly based on networking elements uncovered by the study in the three benchmarked organisations. The FMO could encourage the NFPs to create 'national communication networks'. They could comprise of communication staff from the NFP (as a lead), POs, FOs, and potentially also the Donor State embassies. These networks could share knowledge, coordinate activities and even organise joint training.

The study findings

Feedback from stakeholders

Overall, no major issues of cooperation among the different actors were identified in **consultations with stakeholders** (in the surveys, interviews or case studies). The exception was The Norwegian Embassy in Poland, which would welcome closer cooperation with the FMO, believing that the communication activities of both institutions could be enhanced by stronger coordination. However, there seems to be room for improvement in a number of other elements. For instance, the Portuguese NFP raised the question of the disparities between the different countries on terms of communication and suggested there is a need to strengthen cooperation between the Beneficiary States by sharing knowledge and good practices. In some Beneficiary States, there is also room for more support in communication from NFP to POs and there are also good practice examples from some other countries (e.g. Portugal, Latvia), which can be shared.

The **interviewees** at the programme level suggested three areas where cooperation could be improved:

- Some interviewees suggested that there should be a bigger involvement of the DPP in the promotion/communication of the project in the BS. The DPPs claimed that there could be more content sharing
- More training sessions would be advised due to the specific characteristics of the EEA and Norway Grants and to alert every Communication Officer from each Beneficiary State of the latest communication trends

Respondents from the PPs consulted within the study did not highlight any difficulties in cooperating with Programme or Fund Operators. Some anecdotal evidence suggests that FOs are more engaged than POs in proactively provide support to their PPs also in the area of communication (providing some ad hoc training). This can be linked to the specificity of FOs as civil society organisations (in the study we interviewed FOs engaged in managing the Active Citizens Fund).

In terms of International Partner Organisations, their level of cooperation with the FMO varies. Representatives of two IPOs (the OECD and FRA) highlighted that their role within the EEA and Norway Grants goes beyond the IPOs' role. They are also involved in the implementation of specific projects as project partners. They highlighted the importance

of distinguishing the two roles, because these take place in different communication contexts. The Council of Europe is not involved in the implementation of specific projects within this funding period.

The interviewees indicated that the role of IPO itself is not relevant to communicate to external audiences, as it is more process oriented. One of the interviewees described it as “behind the scenes” role. Therefore, communication teams of the IPOs tend to be reluctant to communicate about it, as they try to make their communication adjusted to wider audiences, which are not interested in behind-the-scenes processes. Perhaps the only communication activity related to that role, which can be implemented, is acknowledging the IPOs’ role on their websites, which is already their obligation according to the Annex 3. The target audiences of the FMO and the OECD are too different to allow for more collaboration (for the FRA they are more similar). The OECD targets mainly international experts interested in OECD’s research results.

What can be communicated to the external audiences is content created in projects, information about IPOs’ engagement in project activities and the outcomes of the projects. According to the interviewees, this explains why their communication about the Grants was rather limited so far, because the projects are only starting now, and they haven’t yet had relevant information to share. When IPO is not involved in projects (the case of the CoE) it in a way lacks content that could be communicated. However, it still shares content published by the FMO on social media.

Consultation with the three organisations suggests that the model of cooperation with FRA will not work for the other two organisations (CoR and OECD), which are larger and with wider scope and focus. However, the opportunities for more collaboration in communication lie in the project engagement where the IPOs are partners and where relevant content and information are created. The combination of IPO and project roles seems to create better opportunities for developing synergies in communication.

Additionally, the interviews also suggested that closer cooperation between the FMO’s and IPOs’ communication teams could be useful. The interviewees highlighted that currently the cooperation between the FMO and IPOs is mainly through contact persons on both sides, but direct contacts between staff responsible for communication could be beneficial for strengthening synergies in communication. Interviewees suggested that there is room for more coordination. The cooperation between the FMO and Donor Programme Partners was already discussed in **EQ12**. In general, there also seems to be scope for greater collaboration in the form of providing DPPs with communication materials / content and success stories to disseminate, but there is also a question of division of tasks between the FMO and the Donor Ministries and the FMO’s mandate.

Benchmarking exercise

Three benchmarked organisations, the World Bank, DG REGIO and the FPI, put emphasis on networking and connecting communication staff in different organisations through a community of practice to share ideas and best practice.

DG REGIO has set up an expert communication group in which communication leaders share experiences. The INFORM EU Network is an EU-wide network of communication officers responsible for communicating EU and Member State investments under shared management. The network is a cooperation platform between the Commission and EU programmes under shared management. It fosters the expertise of Member States and regions in the field of EU communication, visibility and transparency. Its objective is to enhance the visibility of EU action at the national, regional and local level through the:

- exchange of experiences and good practices in implementing information and communication measures
- coordination of communication activities between the Member States and the Commission
- assessment and discussion of strategies to increase the outreach and impact of communication activities

DG REGIO also recommends that Member States establish a national network of the communication officers of all programmes in individual countries to support the exchange of know-how and develop common approaches, where relevant. Representatives of other institutions, such as EC and EP representations and European Direct Information Centres in a particular country are also invited to participate in the network. Similar country networks could also be created in the EEA and Norway Grants Beneficiary States. They could comprise of communication staff from the particular NFP (as a lead), POs, FOs, and potentially also the Donor State embassies. These networks could share knowledge, coordinate activities and even organise joined training. In fact, such network exists for instance in Latvia, and could be used to share best practices with other Beneficiary States.

Sustainability: Lasting benefits

Which recommendations from the previous Communications Review have been taken up by the FMO, and to what extent? Of the recommendations which have not been taken up, what were the key reasons for that? (EQ17)

Answer to the evaluation question

Most of the recommendations from the previous Communications Review have been fully or partially implemented by the FMO.

Recommendations to concentrate responsibility for communicating to the general public at the national level (in the NFPs) was implemented. There is still some fragmentation as POs and PPs are required to have their own programme/project websites. However, these websites can have an added value of promoting the programmes towards their specific target groups. DPPs were included in the Annex 3, but the embassies were not.

The key recommendations related to naming conventions, including removing EEA abbreviation from the logo and limiting the plethora of logos were fully implemented. The EEA abbreviation is still used in the web address of the main Grants website.

Recommendations related to channels / tools / resourcing were implemented, including creating national Grants' websites, which was confirmed in this study. A recommendation to consider defining a separate budget line reserved for communication activities was partially implemented. The communication team at the FMO has its own budget line and the NFPs have their own budget for communication activities. Communication activities conducted by POs, FOs and PPs, are included in management costs, without separate budget line.

The previous evaluation also recommended to support the development of more consistent national monitoring and evaluation frameworks. The NFPs, POs and PPs are obliged to plan evaluation measures in their communication strategies and plans, but there is no consistent evaluation framework comparable between the Beneficiary States. The lack of this element was also highlighted elsewhere in this study (see evaluation question 8). A recommendation to develop a common template for communication strategies and an annual strategic report was not implemented. This study also suggests that a template for communication plans is needed.

The study findings

In 2015-16, Tetra Tech (then Coffey International Development) conducted the independent Communications Review of the EEA and Norway Grants for 2009-2014.¹⁹ The review identified good communications results but also showed that there were major differences in the quality and scope of practices carried out by the actors involved in the cooperation programmes. This resulted in a number of recommendations regarding roles and responsibilities, naming conventions, communication channels and tools / resourcing, and monitoring and reporting. The status of implementation of these recommendations, as assessed by FMO officials, including details, is presented in the table below. That table suggests that all the recommendation were fully or at least partially implemented.

¹⁹ Communications Review of the EEA and Norway Grants 2009-2014. Final Report (2016), Coffey International Development.

Table 4. Implementation of previous communication review's main recommendations

Recommendation	Status	Details of implementation
Roles and responsibilities		
To concentrate responsibility for communicating to the general public at the national level (NFPs and POs)	Fully implemented	Annex 3 - the NFPs are responsible for communicating the national-level impact. PPs are no longer obliged to create new project websites (Amendment of the Annex 3). POs and PPs still using their institution's websites to present programme, project, to reach existing specific audiences.
To include Donor Programme Partners and the Donor embassies and the expectations as to their communication actions in the revised Regulations	Partially implemented	DPPs included in the Annex 3 with a list of requirements. The embassies are not included, but given the FMO's mandate it might not be appropriate. The FMO may consider if there is scope to issue guidance on how embassies might support efforts in the Beneficiary States and collaborate with Beneficiary State stakeholders.
Naming conventions		
To replace the 'EEA' abbreviation with one that would be better understood by the general public in order to strengthen Donor visibility	Partially implemented	<p>The 'EEA' in the logo has been replaced with the names of the Donor States.</p> <p>The EEA abbreviation still widely used in communication for instance:</p> <ul style="list-style-type: none"> on the Grants website (it appears 7 times on the website²⁰) and in the web address of the website²¹; in the names of social media channels: Facebook, Twitter and LinkedIn ("EEA and Norway Grants") and YouTube ("EEANorwayGrants"); name of #EEAChdropcounts social media campaign; social media hashtags, for instance #WeareEEA.
To limit the plethora of logos and names with which the sponsored projects are currently branded and ensure prominence of the Grants' names and logos	Fully implemented	The Communication and Design manual clearly states that the Grants logo should be superior to any others in all communication materials. In the study only a limited number of stakeholders referred to this as an issue. It is standard practice not to use so many logos.
To ensure prominence of the Grants' names and logos, and be explicit that all actors are encouraged to conduct additional communication activities on top of those listed in the Regulations / Annexes	Fully implemented	Article 1.2 of Annex 3 indicates that all information and communication measures listed should be regarded as minimal and all actors were encouraged to conduct additional communication activities.
Channels / tools / resourcing		
To consider developing national websites for the EEA and Norway Grants	Fully implemented	This recommendation was implemented. This study confirms the existence of national websites (only Malta does not have a specific Grants website but rather a webpage in a general section of the website about external funding).
To include a requirement that all websites presenting the Grants comply with the Web Content Accessibility Guidelines (WCAG) for the visually impaired	Fully implemented	This requirement was included in Article 2.1.4 of Annex 3. The fulfilment with these requirements was assessed within the study. It is summarised in Annex 3 of this report.

²⁰ As of 20 September 2021.

²¹ <https://eeagrants.org/>

To consider defining a separate budget line reserved for communication activities	Partially implemented	The Communication Team at FMO has their own budget line. Requirement for NFP hiring a communication professional is included in Annex 3, Article 2.1. Beneficiaries (at NFP level) have their own communication budget. For programmes and projects, it is included in management costs (no separate budget line).
To pull all information about the programmes and projects 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	Fully implemented	As discussed above, national websites for the Grants exist in all Beneficiary States (in Malta this information is included on the website about external funding).
Monitoring and reporting		
To support the development of more consistent national monitoring and evaluation frameworks	Not implemented	Article 2.3.1. of Annex 3 requires the NFPs to report on the implementation of the Communication Strategy and activity plan & submit to the FMC/ NMFA with the Strategic Report. The POs have to report on implementation of communication in their Communication Plans. There is some limited guidance on evaluating communication in the Communication Manual. However, a consistent monitoring and evaluation framework allowing for comparable measurement of communication results between the Beneficiary States has not been created.
To draw more integrated and purposeful approach to monitoring and evaluation, to consider developing national / programme impact summaries	Partially implemented	Article 2.1.1 of Annex 3 requires the Communication Strategies of NFPs to include information on implementation, results and the overall impact of the EEA and Norway Grants in the Beneficiary State. Article 2.2.2. puts similar obligations on the POs' Communication Plan. However, overall integrated approach to monitoring and evaluation has not been created.
To consider creating a common template for the Communication Strategies and a common Annual Strategic Report template	Not implemented	Article 2.1.1. of Annex 3 lists the minimum requirements for the Communication Strategy, and the Communications and Design Manual includes a check list, but a template (Word document) was not created.

Source: *Main Recommendations: Communication review of the EEA and Norway Grants 2009-2014. Final report, August 2016, Coffey International Development; Implementation: Previous Comms Review Recommendations (Excel file provided by the FMO)*

The previous Communication review of the EEA and Norway Grants (2016) also provides a number of specific recommendations, in chapters 4-7 of the final report²². Many of these were addressed in the amendment of Annex 3. However, a few were not addressed and a need to implement them also emerged in this study. Some were already listed in the table above, for instance a need to creating a common template for the Communication Strategies and a common Annual Progress Report template. We discuss the remaining ones below.

Both this study and the previous assessment highlighted the need to support the development of a more consistent national monitoring and evaluation frameworks for communication activities across Beneficiary States. This study suggests that a standard monitoring framework for the Grants should be developed and introduced at the level of the FMO to allow comparability between programmes and countries. The previous study also highlighted the need for more focused baseline research to investigate information needs and test draft messages with specific target groups to tailor specific messages and information to specific target groups.

²² Communication review of the EEA and Norway Grants 2009-2014. Final report, August 2016, Coffey International Development.

The previous assessment also highlighted that, “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 funds to allow some form of advertising / communication campaign, including via mass and digital media”. It is assumed that increasing levels of funding allocated to communication is a challenge. However, this implies the need to make different choices on the allocation of funds to focus on those with higher impact and this evidence will be supported through a more developed approach to monitoring and analysis. The **benchmarking exercise** within this assessment also suggests that this could be done through joint multi-country campaigns coordinated by the FMO.

Although progress has been made in exploiting more the potential synergies with storytelling, as suggested by the previous assessment, some further development is possible. As the benchmarking exercise suggests, the FMO could establish a separate section on its website to publish story-telling project briefs. This would provide a “shared platform accessible by the actors at all levels for sharing success stories”, recommended by the previous assessment. The previous study also highlighted the need to provide training and / or clear guidance on developing success stories from project results. Creating a template/common structure of these documents would also be useful.

Finally, the previous assessment pointed to requesting the National Focal Points to translate the Communication and Design Manual into native languages to help Programme Operators, and in particular, Project Promoters and consider replacing the “EEA” abbreviation with one that would be better understood by the general public. These are also recommendations of this assessment.

Impact: Difference made

To what extent can the current communication set-up generate negative unintended effects in Beneficiary States? These could be the BS experiencing challenges to the main principles of the Grants (e.g. the rule of law, gender equality, including domestic and gender-based violence, respect for the rights of minorities). How can the FMO or the FMC mitigate those effects? (EQ18)

Answer to the evaluation question

The study identified that communications about the Active Citizens Fund (by the FOs and PPs) can create negative unintended effects, which can be challenging for stakeholders. This situation relates directly to the rationale for providing these Grants in certain Beneficiary States. Any negative consequences connected to ACF-related communications are not a consequence of the poor or ill-thought through communications, but a consequence of a challenging communication environment. However, stakeholders faced with such challenges would benefit from the FMO, NFPs or the Donors being more active in supporting them in specific critical situations and in providing guidelines for how to handle communications, which generate significant negative publicity.

The objectives of the Active Citizens Fund are controversial in some Beneficiary States, with some issues (such as inclusion of immigrants, Roma rights, women's and LGBT rights or gender equality) being part of the on-going political debate. It is challenging to manage communication activities in these countries, because communication activities to announce specific project results and calls for proposals can actually generate negative media coverage. Negative coverage and reverberations on social media can be challenging for Project Promoters and Fund Operators, particularly when they are mentioned. It can also 'tarnish' the image of the Grants as supporting principles, which a certain media or audience resists. Conversely, the coverage most likely strengthens the image of the Grants in these media or social groups, which support these principles.

The study findings

Few interviewees in the **case study** countries were able to identify negative unintended effects of the current communication setup. However, for some interviewees this topic was very important and challenging. They pointed out that some topics have the potential to create controversies or negative comments. This was related to negative reactions from the general public or certain political groups towards projects financed by the Grants that advocate for topics that are sensitive in some Beneficiary States, such as inclusion of immigrants, Roma rights, women's and LGBT rights or gender equality. As an example, one of the Fund Operators reported being attacked in the conservative media every time it publishes results of calls for projects (interviewees gave an example of media article titled: 'Donations for deviations', claiming that Norway, Iceland and Liechtenstein 'spread gay propaganda').

These effects are not generated by the communication setup, but rather by political tensions and polarisation in some of the Beneficiary States and some governments being openly hostile towards the values promoted by the Grants. However, this Fund Operator mentioned it would benefit from receiving some support in crisis communication in responding to such attacks. This could be a representative of the NFP (which is rather unlikely), the FMO or the Donor States confirming that a particular call for projects was carried out in line with procedure and the applicants were evaluated and selected according to the rules in the Grants. In an official statement they could also confirm to the media and the public that the values promoted within the granted projects are the values supported by the Grants and the Donors. This would not only support the FO but also smaller grantees (PPs), which may not be used to facing similar situations and handling them in their communication.

4. Methodology of the study

Study requirements and questions

The overall study objectives were to **review how the communications work is carried out** under the current set-up for the Financial Mechanism 2014-2021 as regards the communication requirements and responsibilities for the different actors²³ involved in the running and promoting of programmes and projects under the EEA and Norway Grants, and to analyse the **results and effectiveness of the coordination within the network of these actors**. The study therefore looked at coordination between the FMO and the National Focal Points and Fund Operators, as well as between the National Focal Points, the Programme Operators, Project Promoters, Donor Programme Partners, and International Partner Organisations for communication-related aspects.

The objectives translate into 6 key themes and 18 specific questions, which we provided answers to in Chapter 3.

The study included the following data gathering tools:

- Desk review of communication strategies (developed by the NFPs) and plans (developed by the POs);
- Review of national EEA and Norway Grants websites and social media accounts
- Surveys with entities in Beneficiary States and Donor States
- Interviews with representatives of Ministries of Foreign Affairs in the Donor States and International Partner Organisations
- Case studies in five Beneficiary States (Latvia, Poland, Portugal, Romania, Slovakia)
- Benchmarking communication approaches against three other comparable international organisations.

Data collection tools

Desk review of all communication strategies and communication plans

The framework of Beneficiary States' actions to communicate on the EEA and Norway Grants are the communication strategies developed and implemented by the NFPs. Hence, the starting point of this assignment was a review of these strategies. We reviewed 14 strategies from all Beneficiary States, except Hungary.

The review of communication strategies was complemented with the examination of all communication plans, which are developed and implemented by the POs. We reviewed 88 of them to arrive at a comprehensive picture of the extent to which Beneficiary States have established the necessary processes and structures to fulfil the communication requirements.

Both reviews were based on structured review matrixes, to verify the content of documents against the criteria included in the Regulations. The matrixes are presented in Annex 4 to this report.

Review of national websites and social media

To assess whether each Beneficiary State has a dedicated website for EEA and Norway Grants, and whether these websites meet the requirements, as well as how social media is used and prioritised by the NFPs and POs, we carried out a detailed review of all national websites and social media used by the NFPs.

This was again based on review matrixes, which are presented in Annex 5 to this report.

²³ the FMO, National Focal Points (NFPs), Programme Operators (POs), Project Promoters (PPs), Donor Programme Partners (DPPs), Donor Project Partners, International Partner Organisations, Fund Operators

Surveys

To collect direct feedback from the actors ultimately responsible for communicating on the Grants on their experiences in following-up on the Regulations and provisions, we carried out three surveys – one targeted at all National Focal Points, Programme Operators, Fund Operators and Donor Programme Partners. The second was addressed to Project Promoters and Donor project partners. Annexes 1 and 2 (separate documents) present the detailed survey reports, including description of technical measures and response rates.

Interviews with Ministries of Foreign Affairs in the Donor States

We conducted three interviews with representatives of Ministries of Foreign Affairs in each Donor State and three International Partner Organisations to collect their views on the FMO's communications set-up and processes, their expectations towards communications on the Grants, and their perceptions of the cooperation between the different actors. The table below presents a list of interviewees.

Table 5. Interviews with the ministries and IPOs

Type	Institution	Interviewee	Date
MFA	Ministry of Foreign Affairs – Iceland	Áslaug Karen Jóhannsdóttir	4.02.2021
MFA	Ministry of Foreign Affairs – Norway	Emma Kwesiga Lydersen	5.02.2021
MFA	Ministry of Foreign Affairs – Liechtenstein	Nuscha Wiczorek	12.03.2021
IPO	European Union Agency for Fundamental Rights	Maria Amor Martin Estebanez	2.06.2021
IPO	OECD	Klas Klaas	9.06.2021
IPO	Council of Europe	Alberto Maynar-Aguilar	21.06.2021

Benchmarking exercise

The benchmarking exercise included reviewing three communication set-ups and processes in operation in three comparable international organisations. This consisted in one interview and desk research (communication strategies and plans, evaluation and monitoring reports, guidance documents, design manuals, etc.) per organisation. The aims of the benchmarking exercise was to:

- compare the FMO communication requirements with the requirements set by other comparable organisations
- identify potential efficiency gains both, within the FMO and through the Guidelines / Manuals issued by the FMO, based on learning from the communication practices of other comparable organisations
- identify good practices / lessons learned that can be put forward to the FMO as regards, for example, communication governance structures, monitoring and reporting mechanisms, training provisions, building synergies with other (national, programme) activities / actors, etc.

The table below presents the list of organisations and interviewees involved in the study.

Table 6. Benchmarking exercise interviewees

Institution	Interviewee	Date
DG for Regional and Urban Policy	Head of Communications	27.05.2021
World Bank	Head of Business Intelligence and Digital Governance	02.06.2021
Service for Foreign Policy Instruments	Project Manager, Communication Focal Point in FPI.4	23.09.2021

Case studies

The countries covered by the case studies (Latvia, Poland, Portugal, Romania and Slovakia) was selected by the FMO. The study was focused on a sample of programmes implemented in those countries, which ensured a balance between the programmes in terms of:

- the quality of communication plans
- the size of programmes in terms of financial allocation
- the potential for political sensitivities
- their Priority Area

We included programmes, which have a Roma element (2 Programmes) as well as the Active Citizens Fund (3 Programmes), which is often perceived as an EEA and Norway Grants flagship initiative.

Finally, we included programmes, whose Programme Operators contributed to the survey and, in their answer, they:

- identified any issues with the communication requirements from Annex 3 (Q9-Q10) (6 Programmes)
- found communication requirements from the Annex 3 challenging (Q13-Q19²⁴) (5 Programmes)
- indicated in the survey that they had exceeded the basic communication requirements from Annex 3 (Q24) (7 Programmes)

Altogether we selected 20 Programme Areas, which cover all five Priority Areas, as indicated in the table below.

Table 7. Selected Programme Areas per Priority Sectors

		Innovation, Research, Education and Competitiveness	Social Inclusion, Youth, Poverty	Environment, Energy, Climate	Culture, Social Rights, Good Governance	Justice and Home Affairs
Portugal	Active Citizens Fund					
	Cultural Entrepreneurship, Cultural Heritage and Cultural Cooperation					
	Environment, Climate Change and Low Carbon Economy					
	Work-life Balance and Gender Equality					
Romania	Education, Scholarships, Apprenticeships and Youth Entrepreneurship					
	Active Citizens Fund					
	JUSTICE					
	Local Development and Poverty Reduction, Enhanced Roma Inclusion					
Latvia	Active Citizens Fund					
	Correctional Services					
	Research and Education					
Slovakia	Climate Change Mitigation and Adaptation					
	Business Development, Innovation and SMEs					
	Local Development, Poverty Reduction and Roma Inclusion					
Poland	Active Citizens Fund (national)					
	Applied Research					
	Culture					
	Energy and Climate Change					
	Health					
	Home Affairs					

²⁴ In these questions, respondents were provided with a list of Annex 3 requirements and asked to assess how challenging it was to address them on the scale 1-5 with 1 meaning 'not at all' and 5 meaning 'to a great extent'. In this column, we marked respondents who:

- Whose average response was above the neutral level, i.e. above 3
- Who found at least one item very challenging, i.e. at least one '5' answer
- Who found at least 3 items challenging to some extent, i.e. at least three '4' answers
- Who mentioned any issues with the requirements in open comments

The research tools included:

- Mapping of communication materials and activities delivered under the selected Programme Areas;
- In-depth interviews with in-country stakeholders including National Focal Points, Programme Operators and Fund Operators
- In-depth interviews with FMO country officer, Donor Programme Partners and Donor Embassies' staff²⁵
- Interview with Project Promoters

Due to the Covid-19 pandemic, all interviews were conducted online. They took the form of semi-structured discussions. Altogether, 62 interviews were carried out including:

- Portugal: 12 interviews
- Romania: 11 interviews
- Latvia: 11 interviews
- Slovakia: 12 interviews
- Poland: 16 interviews
- DPPs which cover more than one country: 9 interviews

The detailed lists of interviewees are provided in country reports in Annexes 6-10 (separate documents).

²⁵ Iceland and Liechtenstein do not have embassies in the Beneficiary States therefore we only interviewed representatives of the Norwegian embassies in the case study countries only.