

CEPS SPECIAL REPORT



Thinking ahead for Europe

THE EXTERNAL COMMUNICATION ACTIVITIES, TOOLS AND STRUCTURES OF THE EUROPEAN COMMISSION

LESSONS LEARNED AND NEW AVENUES

REPORT TO THE SCREENING WORKING GROUP OF THE EUROPEAN COMMISSION

SEBASTIAN KURPAS

CHRISTOPH MEYER

MICHAEL BRÜGGEMANN

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The External Communication Activities, Tools & Structures of the European Commission

Summary Report

Main Findings, Recommendations and Options

1. Introduction

This summary report contains the main findings and recommendations of a larger study on the European Commission's external communication activities, tools and structures. The main study follows this summary report. The objective of the study has been to provide analytical insight and research-based recommendations to the Commission's Screening Working Group concerned with the institution's public communication. The overall questions to be addressed were the following:

- What lessons can be drawn from past and current activities on the best cost-benefit ratio of different communication activities and tools for specific objectives/priorities/target groups?
- How can the allocation of resources devoted to communication within the Commission be improved to make communication more efficient and effective?
- How can the governance model for communication activities be further improved to make communication more efficient and effective?
- Can duplication or gaps in the communication activities of the different DGs, including Representations (REPs), be detected, and if so, how can they be addressed?
- Are there any communication activities that could/should be discontinued on grounds of lacking cost-benefit or changing environment (new technologies, etc.)?

The structure of this summary report follows of the main study, presenting the key findings, but also putting forward 50 recommendations and – where appropriate – suggesting strategic options. In order to better inform decision-making, the report at times also provides an assessment of the urgency and importance of selective recommendations. Where possible, it points to staffing and financial implications and potential drivers of the process. The reader is advised to consult the main study for a more extensive analysis of the various findings as well as the tables and figures underpinning and illustrating them.

Any assessment of the European Commission's external communication activities should note the extraordinary challenges the institution faces as well as the constraints under which it is operates. The challenges include the linguistic, social and political diversity of audiences and the weakness of a transnational infrastructure for public debates about issues with a European dimension, including the lack of European mass media and political parties. The major constraints are the Commission's role as mediator and consensus-broker within the institutional set-up, the lack of involvement of member states in EU-related communication either individually or through the Council, and the fragile legitimacy of the European Commission as a political voice in national public debates on European issues.

However, past problems of the Commission are not only linked to external factors, but also to an historical legacy of neglect concerning communication and a culture in which legislative output and sound administration came first and communication was considered as an afterthought.¹ The present study shows that this legacy still affects a range of aspects, although the situation does not allow for generalisation. To a varying degree it concerns the skills profile and distribution of human resources, the choice and use of communication instruments, the governance structure including the issue of political leadership, the profile and influence of communication services and finally, unwritten rules and norms about what is seen as important and should be rewarded.

The Commission has embarked on changing this culture, most notably through the ambitious 2005 Action Plan. Substantial improvements have been made in a number of areas, partly through new resources, partly through structural and procedural reforms, but most importantly through the staff involved in communication activities. Due to the dynamic nature of these changes, we felt it was at times too early to assess whether they were delivering the intended results.

2. Coordination and Governance of Communication

2.1. The College and Commission-wide Governance

Finding 1. The Commission currently defines broad themes as annual communication priorities, but very little is said about the intended effects with regard to these themes. This leaves too much room for ambiguity and hinders the implementation of priorities. Moreover, there have been too many priorities for an effective allocation of resources and making the priority project teams work efficiently.² The process of defining objectives and priorities is in many cases not based on clear criteria or indeed systematic stakeholder research, including polling. This means that communication objectives are often not sufficiently based on an understanding the needs of the target audience (‘pull-logic’), but still follow too frequently internal considerations of the institution (‘push-logic’). The current practice does not allow for a clear prioritisation of objectives and definition of intended effects (see also Finding 7). The lack of criteria for defining objectives, the under-specification of intended effects and their sheer number constrains the efficiency and effectiveness at the level of implementation, resources and evaluation.

On top of the annual communication priorities, the Commission has also outlined three strategic principles underpinning a “new approach” to “earn people’s interest and trust” (Action Plan, p. 3): i) *Listening* in order to understand citizens concerns and preferences and to use it for policy formulation and output; ii) *Communication* in order to inform

¹ The main study to make this point is the historical overview of the Commission’s public relations by Marc Gramberger (1997). Interestingly, national administrations have faced similar problems in their external communication (see the Phillis Review of 2004 for the case of the UK).

² For the year 2007, the Commission Legislative and Work Programme contains 19 communication priorities, (see Annual Policy Strategy 2006, COM (2007) 65 final, p. 16, at: http://ec.europa.eu/atwork/synthesis/doc/aps_2008_en.pdf).

about and gather support for policies and political developments and iii) *Connecting with citizens by 'going local'*, which involves more attentive better listening to diverse demographic, national and local concerns and “to convey information through the channels citizens prefer in the language they understand”. We found that there is substantial uncertainty within the DGs about how to translate these principles into practice, given limited resources and the sheer social and linguistic diversity of European publics (see also Finding 10). Given the resource constraints, it is not clear how the Commission can systematically listen to the general public’s diverse concerns and address them through the communication channels citizens use on a daily basis in their native language.

Recommendations

1. In order to effectively translate the annual communication priorities into practice, it is important to reduce their number. In an ideal scenario, the Commission would adopt no more than five communication priorities. A small number of priorities will make it more likely that the priority status can translate into a meaningful allocation of resources. Moreover, the objectives should be more clearly elaborated in terms of intended effects and based on genuine research of stakeholders, including targeted surveys of the various publics’ interest in and need for information about specific issues. [*No shifts in resources necessary.*]

2. We also recommend that the Commission should clarify the level of ambition with regard to its strategic communication principles: in particular, what is meant *specifically* by ‘going local’ and how can it overcome the challenge of multilingual communication with current resources, including systematic listening? Such clarification is of great importance. The report suggests that the Commission will either have to reduce the level of ambition embodied in these strategic principles by providing some guidance on how to prioritise them, or it needs to massively shift resources towards those services (REPs, translation) and instruments (the internet) that increase the chances of translating ‘going local’ into practice for all policies and all DGs. The second alternative will however come at the detriment of other communication objectives relating to specialist stakeholder communication. [*Clarification might lead to major shifts in resources.*]

2.1.2 Leadership in Implementation

Finding 2. We found that the overall as well as DG-specific communication priorities and objectives are not yet fully integrated into the decision-making, co-ordination and planning process. This leads to a host of problems with regard to choosing the right communication instruments, realising synergies arising from forward-planning, evaluating and rewarding communicative performance and allocating resources efficiently. The problem starts at the top, as there appears to be a lack of systematic and regular decision-making or planning with regard to strategic public communication following the suspension of the Group of Commissioners for Communication. The lack of top-management involvement beyond DG COMM is also evident when deadlock occurs over communication priorities and key projects, including the continued implementation of the 2005 Action Plan. DG COMM currently does not have the authority to resolve inter-institutional conflicts over communication resources and priorities and will continue to depend on the support and involvement of other relevant horizontal authorities in steering and implementing external communication, most notably the College, the Secretariat General and the cabinets.

Recommendations

External communication needs to be understood as an integral function of governance, and not merely as a sectoral policy like any other. It is important to bring about a higher involvement of senior management. To this end several *options* are suggested below.

3. A ‘Communication Steering Board’ could be created to oversee the translation of the Commission’s communication priorities and the Action Plan into institutional reality and effective activities. This board could be composed of the President’s spokesperson, a representative of cabinet members with the communication portfolio, the Director General of DG COMM, a representative from SG, DG BUDG and DG ADMIN and the chairs of the priority project teams from sectoral DGs. The chair of a possible ‘Expert Advisory Group’ on communication (see next paragraph) could also participate. The steering board could also intervene whenever there is a lack of co-operation or conflict over key communication resources within a project team or a key infrastructure initiative, foster compromises or eventually take binding decisions. The Board could also help to operationalise the objectives for the priority themes and initiate the setting up of project teams. *[This option does not necessitate a shift of resources.]*

4. Another strategic option could be that – just as in other areas (e.g. Better Regulation) – the Commission sets up an ‘Expert Advisory Group’ of senior communication professionals to support the communication steering board and the College more broadly through strategic advice. This group could also help to better support smaller groupings of Commissioners wishing to cooperate more intensively on selected themes and issues. *[As the Expert Advisory Group is not meant to be made up of full-time advisors, this option would only have very minor resource implications. High visibility for members rather than remuneration (if at all) should be the incentive for participation.]*

5. It could also be envisaged that Director Generals under the SG would treat communication as a standard agenda point at their meetings. Considering communication at this level would ensure that good management practices at the Commission level are diffused to the DG level, where not all communication units regularly participate in management meetings. In this context we would recommend creating the position of a Director of Strategic Communication *without administrative responsibility* to devote substantial time to the synchronisation of policy and communication priorities. In the UK for instance, there is high-level representation of communication tasks in government through two offices: the Director of Communication in the Prime Minister’s office and the Permanent Secretary as the Head of Profession for the Government Communication Network. *[The post of Director of Strategic Communication does have resource implications. It can be argued, however, that efficiency gains and avoidance of duplication will more than make up for the additional cost. The post should be subject to review after a certain period of time in the light of achievements.]*

Finding 3. The revival of the External Communication Network (ECN) has been positive, but the evidence from interviews and questionnaires indicates that it is not the type of body that can drive and ensure the reform agenda outlined in the Action Plan. We noted differences of view among participants regarding its utility (see section 2.1.2 of the study). In interviews it was stated that the discussions in the ECN sometimes lack structure and focus. In contrast, the issue-focused ECN working groups were praised, but there were also concerns about the proliferation of meetings and its negative repercussions for core tasks of Heads of Communication Units within DGs.

Recommendation

6. A reform of the ECN and its working groups could improve forward planning and output and decrease the frequency and length of meetings for Heads of Units. The network could concentrate on further developing the working groups with varying purposes and varying compositions. The exchange of best practice could take place in the form of thematic workshops (marketing, procurement, press-relations, networking, etc.) with input from external experts and participation of selected staff from the DGs also beyond the head of unit. ECN working groups (i.e. not the whole ECN) should focus on particular problems such as framework contracts or web-strategy. It would be particularly important that the forward-planning function of the ECN takes place in line with the Commission's budgetary and policy cycle, i.e. through early meetings with all DGs in order to better align the Commission's (better operationalised) communication priorities with the priorities and communication strategies of individual DGs.

[No shifts in resources necessary.]

Finding 4. While the 'planning ahead' as part of the ECN working group works reasonably well within the 1-2 month time-frame, longer-term planning works less well, with negative implications for efficiency. This is partly because longer term planning is not the main focus of the 'planning ahead' group of the ECN, while DG COMM struggles to fill the gap for a number of reasons. Firstly, until very recently most communication units within DGs have not been able to plan ahead themselves and were subject to sudden demands from within their own house to support certain initiatives. Secondly, the Spokespersons Service (SPP) and Cabinets are focused on shorter term media communication and there is no other actor with a strategic communication planning capacity at the horizontal level that has the expertise and standing to interact with the President and Cabinets. The SG fulfils its role with regard to policy planning, but not with a specific view to communication. Finally, there is also a technical and procedural problem of how to share information about upcoming events and activities. Although a calendar planning tool exists, it does not work well. It has been initially designed to deal with the external stakeholders, not for internal co-ordination purposes.

Recommendation

7. It could be considered that a high-level horizontal body such as the proposed Communication Steering Board could play a key role in longer term communication planning. This will, however, also depend on simultaneous improvement in the internal communication planning of DGs as argued in section 2.4. In order to increase the transparency and internal visibility of long-term forward-planning, an online calendar tool could be developed that would facilitate planning up to two years in advance. DGs should be given clear guidance as to what kind of events need to be fed into the programme and there should be a clear signalling function to those other DGs and Representations (REPs) that are potentially affected or concerned by planned actions. *[No shifts in resources necessary.]*

2.2 Bilateral and multilateral cooperation of DGs

Finding 5. Much of the multilateral cooperation between DGs takes place within the priority project teams. However, the focus is mainly on the co-ordination of activities that have already been agreed at the DG-level without any prior consultation, joint-thinking and planning ahead from the project teams. This means that opportunities for creative joint-action are lost and efficiency gains underexploited. DGs are often not

motivated to chair project teams due to resource implications and political risks involved.

While a number of DGs meet regularly on a bilateral basis to discuss their respective communication plans and develop common actions, we found also more institutionalised forms of co-operation between cognate DGs such as the RELEX Information Committee (RIC). It brings together the heads of the information units from the DGs of the ‘RELEX-family’ (AIDCO, ECHO, ELARG DEV, and TRADE) that meet on a monthly basis. DGs of this ‘family’ work more closely together on joint initiatives in the external domain. These forms of multilateral cooperation were considered very useful by the participating DGs as they provide a framework for information sharing and reliable co-operation.

From the perspective of effectiveness at the message level, cooperation can and has been impeded in cases when one DG has a stronger interest in promoting an issue than another one. Even more problematic is when DGs are openly contradicting each other with regards to different messages addressed to the same target audience. Of course, many of these differences in message are related to different political interests and policies, which cannot always be fully reconciled. Such clashes occur usually when the respective DGs are co-operating only on an ad-hoc basis on the given issue or not at all, i.e. not within more formal contexts such as project teams and semi-permanent DG-groups (RIC).

Recommendations

8. A better definition and operationalisation of priority objectives at Commission-, DG- and REP-level is a precondition for avoiding overlaps and gaps. In order to foster information exchange and trust between DGs, we propose to extend the practice of cooperation in a smaller setting, i.e. with DGs in cognate areas or so-called DG families. More structured co-operation within DG families can help foster lateral thinking about common messages, initiatives and resources. With regard to human resources, possible ‘loan schemes’ (see below) are also likely to work better within DG families as well as between DG families and REPs. *[Easily achievable. No shifts of resources necessary.]*

9. It could be envisaged that each DG develops a communication plan that does not only set out the specific communication priorities of the DG, but also how the DG contributes to the College’s overall priorities (if applicable). Such a plan could be based on a common template, which would benefit from having a time-table of planned activities. This information can then be fed into the Commission-wide, longer term forward-planning-process. The communication plan would also be a suitable tool for a better concentration of resources and would help to avoid overlaps with other DGs. *[Easily achievable. No shift of resources necessary.]*

2.3 Vertical coordination: Commission/DGs vis-à-vis REPs

Finding 6. Among line-DGs there is a considerable and rising interest in using REPs more extensively and to ‘go local’. However, this co-operation is complicated by several factors. For example, the way in which the operational relationship to DG COMM is organised leaves little room for formal and legitimate input from DGs into the REPs annual management plans. The result is that the coordination unit in DG COMM and relevant REPs often receive little advance notification about planned activities in a country and support requested by line-DGs.

Also the system of political intelligence and reporting is not working as well as it could. There is currently no adequate communication system in place for REPs to directly reach the right people at the right level in Headquarters and across the Commission with their reports, rather than sending messages to generic inboxes or using their personal contacts. At the same time, Representations are not being told clearly and early enough what the information needs of key users within the Commission are and what the background to initiatives, meetings and decisions is.

The foremost obstacle to better vertical cooperation between DGs and REPs are resource-related. Pilot representations have used their resources in part to intensify cooperation with DGs on priority issues (either Commission-set or national) and DGs are increasingly approaching them for support on various initiatives. However, there is currently no systematic exchange of liaison staff between REPs and DGs, with the marked exception of the so-called ‘Field Offices for Multilingualism’ of DG Translation.

Recommendations

10. A proposal that would require a considerable shift of resources is the allocation of DG ‘liaison officers’ to the REPs. Such a move would not only help REPs to identify planned initiatives earlier, but would also make them communicate better, as they gain access to policy-field specific expertise. ‘Liaison officers’ would not only have to have policy-related knowledge, but also the necessary communication skills. Since it is neither realistic nor necessary to have a liaison officer for each DG in each Representation, two main scenarios could be envisaged:

- There could be liaison officers per DG groupings (e.g. ‘external matters’, ‘economic & social matters’ and ‘other’), which would allow burden-sharing among DGs and should also be in line with the ‘absorption capacity’ of Representations.
- Alternatively it could be considered to allocate liaison officers from DGs according to national priority needs, which would have to be indicated by the respective Representation (for example, a specialist on cohesion funds for a country that is a large net-recipient). This approach would have to ensure equity in commitments. It should therefore be envisaged to determine a maximum and a minimum number of staff to be committed per DG.

It should be noted that the two alternatives will enable the Commission to achieve different results. While the first one would help to develop a pan-European debate on similar issues (as stated in the White Paper of February 2006), the second would focus on special *national* debates on EU-related matters. Which approach the Commission intends to follow is essentially a political choice and lies beyond the scope of this study. A combination of both approaches would certainly also be conceivable.

Both alternatives presented would necessitate shifts of staff among DGs and Representations. They should however be subject to review after a period of three years and would not have to be permanent.

11. It could also be envisaged that DGs post staff in REPs for a much shorter term, only relating to particular initiatives or projects. Such a solution would be easier to put into practice than the two options put forward above. It is also likely to be met with less concerns from DGs. Short-term postings should however be regarded as providing additional project-related support rather than as an alternative to liaison officers. It should also be ensured that the advantages of

additional short-term staff in the Representations are not outweighed by the logistical efforts (planning, office space, etc.) and the commotion caused.

12. As a measure without resource-implications, the report recommends instituting a special annual forward planning session in Brussels. It should bring together key communication staff from REPs and line-DGs, thus following the model of a recent meeting in September 2007. This annual meeting should take place at the end of the year preceding the one that is subject to planning. The meeting should be used to co-ordinate and prioritise how work programmes of REPs can help DGs to implement their priorities. This would also help DGs to understand the prioritisation of services through the REPs and may thus help to avoid ad-hoc requests that REPs are not equipped to deal with. As a general rule, local activities should not be initiated by line-DGs without sufficient prior consultation with REPs.

2.4 Intra-DG co-ordination

Finding 7. According to many interviews, the support and interest from the top hierarchy in communication matters (Director General or Commissioner) is the most important factor determining the extent to which communication concerns have been mainstreamed into the policy-making, implementation and planning of a DG. We also noted marked differences in the degree to which Heads of Communication Units are involved in the early stages of the formulation of the DGs Annual Management Plan and the influence they have in the process of setting communication priorities.

An overwhelming majority of DGs now either has or is in the process of agreeing an annual or multi-annual communication plan. Although the format and substance of such a document varies substantially across DGs, it can be expected to have a positive impact on the consideration of communication concerns early in the DGs policy process as well as facilitating planning at the Commission level and through the respective ECN group.

Recommendations

13. As a general rule, the Heads of Communication Units should become better (and earlier) integrated into the decision-making and planning process of their DGs. Where this is not already established practice, they should participate regularly in the weekly Management Meetings of their DGs, which we regard as a point of particular importance. It is easy to achieve and would have no resource implications. It would be also good practice to situate communication units in a strong horizontal directorate with responsibility for overall strategic questions, as this would help them having access to essential information flows and decision-making within their DG.

14. Following the idea of ‘Information Correspondents’ (INCOs) in DG EAC, it could be envisaged that in each operational unit one AD-official functions as a contact point for the communication unit. In DG EAC, this is complemented by one official per directorate who acts as a ‘Communication Coordinator’ and facilitates strategic planning of the DGs communication activities. Such coordination networks could significantly improve internal information flows (especially in large DGs) and would have no further implications on resources.

15. All DGs should have an annual communication plan, which links the specification of objectives to target audiences, tools, resources and evaluation. Such a plan holds great potential for better reflection about communication activities within the DG and has no further resource implications. It can also help to address the shortcomings identified in Findings 9 and 10 below.

2.5 Co-operation and co-ordination with other EU-institutions and member states

Finding 8. National governments, individual ministries and even regional authorities are attractive partners for co-operation on communication objectives because of their resources, expertise and credibility. The Commission as a whole has sought to form management partnerships with these authorities concerning communication activities. These partnerships offer a potential for overcoming the administrative and political problems that have obstructed co-operation between the EU and Member states in the past. They have been recently put in place in some countries and are foreseen in others. While there is strong demand from some Member states, the financial allocation to these partnerships is currently quite low and limits the opportunities for expanding collaboration on communication between the European and the national level. We also found some evidence of fruitful co-operation between individual DGs and national representatives through a Board of Governors or by establishing more durable relationships and networks.

The relationship between the Commission and the EP has not been without tensions, as both institutions (and the individuals within them) can have different agendas and interests. The inter-institutional agreement is a step in the right direction towards shared communication initiatives on issues affecting the whole EU and putting citizens' information needs at the centre of activities. At the national level the quality of the relationship between REPs and EP varies, but has been improving through common 'Houses of Europe' and management partnerships agreed among both institutions.

Recommendations

16. Management partnerships with Member states are a welcome new approach with substantial potential to overcome the problems of the past and systematically involve national political authorities in the communication of decisions, institutions and rights they helped to create. In order to make them work, they will need to be adequately financed and politically supported. More can and should be done in both domains, but concrete suggestions lie beyond the scope of this study. Since national contexts vary greatly, it is not advisable to follow a 'one-size-fits-all'-approach. What can be highly recommendable in the context of one country would be counter-productive in another one. The different attitudes of national authorities towards the Commission Representations after the negative referenda in France and in the Netherlands are just one illustration of this fact. The key challenge in the relationship is to create a sense of common ownership and try to avoid the impression of anyone free-riding on the resources of the other.

17. Still greater cooperation between Representations and the offices of the European Parliament would be beneficial wherever possible. In view of the strong national focus of public debate in the EU, the challenge both institutions are facing is enormous and every opportunity for concerted efforts and synergies should be used. While acknowledging the different roles and logics of the two institutions, it must be noted that for most citizens the distinction between European Commission and European Parliament is of minor importance. On *general* issues (i.e. issues not linked to concrete policy proposals) potential for cooperation is high, as both institutions share the interest of increasing public knowledge about the EU and specific policies. Potential fields for cooperation could be the communication of the 'Lisbon Treaty', the functioning of EU institutions, achievements of the 2004 enlargement, EU regional policy or the

opportunities resulting from the common market. Another major challenge that deserves the shared attention of all EU institutions is raising the awareness for the next EP elections in order to enhance turnout. On such broader themes that are supported by both institutions, a legal framework could be established that would allow Representations and EP offices to cooperate and ‘loan’ staff on an ad hoc basis for very concrete activities and a very limited time. In practice, this scheme will only be accepted by both partners, if a balanced ‘give-and-take’ is the result. While little stands to be lost concerning overall resources, much can be gained in their flexible employment.

3. Directorates-Generals’ External Communication

3.1 Setting Objectives/Priorities and Identifying Target Audiences

Finding 9. In their responses to the questionnaire, a large proportion of DGs indicated that they were aiming at reaching the general public, yet the choice of instruments indicated an emphasis on reaching more narrowly defined stakeholder groups. Objectives are often not formulated in a way that allows them to be operationalised in a meaningful way. When asked what DGs intended to achieve towards their target audiences, answers did not match the stated general objectives or general objectives had little guiding function. In many cases objectives were rather formulated in terms of specific communication output or activities (‘to communicate’, ‘to inform’, and ‘to publicise’) rather than in relation to intended effects and target audiences. While the qualitative analysis revealed that most DG see their external communication primarily in terms of generating support for their particular policies, only a minority of DGs stated in their overall communication objectives that they aim to influence attitudes and behaviour.

Finding 10. When comparing the alignment of DGs communication objectives with the Commission’s overall communication priorities, we found that some thematic priorities were oversubscribed, while others were hardly covered at all. This means that the priorities of the individual DGs and of the Commission as a whole are not sufficiently in sync. The report also noted divergent understandings among DGs of what the Commission’s broader strategic objective of ‘going local’ actually means for their own communication activities in the context of limited resources.

Recommendation

18. We consider that implementing some of the recommendations and options listed above (recommendations 1, 2, 3 and 15) will go a long way to address the challenges outlined in the Findings 9 and 10 above. In addition, we think it would be helpful, if DGs stated more explicitly in their communication plans what their objectives, priorities and target audiences are and if they defined more concretely the extent to which they aim to contribute to Commission communication priorities. We consider a clarification at this level to be a precondition for a more efficient allocation of communication resources and more informed choice of instruments.

3.2 Choosing and Using Communication Instruments

Finding 11. A uniform assessment of the suitability of different communication tools and activities is impossible, given that this choice is dependent on many factors, most notably varying objectives and target audiences. However, we found that the choice of tools is hampered by a lack of clarity about objectives and target audiences noted earlier

and the concomitant risk of ad-hoc initiatives from inside a DG to publicise certain initiatives without sufficient regard to target audiences and their needs – i.e. a ‘push’ rather than a ‘pull’ mentality with regard to choosing tools and activities. Ultimately, the most important single factor for whether instruments and activities are used cost-efficiently is staff with the right expertise and the freedom to use it. However, the interviews revealed that a considerable proportion of staff neither had an academic background in public communication (e.g. a respective degree) nor substantial practical communication expertise prior to joining the Commission. Only quite recently has the institution sought to provide better information about the availability of different tools across line-DGs and communication service DGs and to provide training to communication managers on how to best access and use them.

Finding 12. The relative strengths and weaknesses of different communication media are not always reflected by the choice of tools and how they are used. For instance, given that most DGs still have specialized stakeholders as their primary target audience the relatively high proportion of costs for publications, including distribution and storage costs, is difficult to justify. Producing and distributing free print publications aimed at specialist audiences who would be either prepared to pay for them or do not need them seems problematic. In some cases publications were priced, but at the same time a large proportion of free copies were distributed, thus undermining the sales potential and attractiveness to professional outlets. Similarly, TV should not be used to convey complex or lengthy messages to the general public and the potential for interactivity of the web has so far not been fully exploited, as some websites give the impression of being ‘storage space’ for large, (originally) print publications. There is also a risk that some tools, such as VNRs, are over-used because they are seen as ‘popular’ within the institution, but are not necessarily appropriate to potential users or fail to meet their expectations in terms of quality.

Recommendations

19. We consider it crucial to accelerate the shift from a ‘push’ to ‘pull’-mentality in communication by better identifying and responding to real needs of the respective target audience. For instance, it is much easier to engage citizens if there is a direct and measurable consumer benefit to EU policies (e.g. air passenger rights, roaming charges) or a particular national dimension (e.g. preservation of the imperial measurement system in the UK). Pricing more publications could be a means to better measure specialist audience demand and reduce the number of titles and copies produced. This shift in mentality can only be achieved by mixing different measures and involving different parts of the Commission, including more training and staff-development, better ex-ante and ex-post evaluation, as well as better central research facilities regarding the needs of stakeholders, publics and media outlets. Some of these measures may have resources implications, which would be, however, offset by using tools more efficiently.

20. We recommend more opportunity-driven communication that extends the reach of communication impact beyond ordinary benchmarks for traditional instruments by creating new mass media opportunities: A particularly effective form of communication is tapping into the visibility and appeal of other organisations, in particular, but not only entertainment industries with mass appeal. This is usually only possible when reaching out on particular causes that are shared with these groups and that are seen as non-partisan and not overtly political: e.g. UEFA sponsoring for physical fitness (DG SANCO), the football game ‘ManU vs. Europe’ (UK REP) or the ‘EU Project Day’ in German schools that attracted high profile national figures and

therefore media coverage (REP Germany). A variation of this theme is the engagement with networks of professionals with a high visibility or outreach, such as Chefs in restaurants (DG SANCO), or TV weather presenters through the Climate Broadcaster Network (DG ENV). ‘News hooks’ can be used to reach multipliers and anchor activities, for instance the 1st-of-May-anniversary of the 2004 enlargement (DG ELARG), the 50th Anniversary of Treaty of Rome, UN International Development Days (DG DEV), G8 Summits (DG ENV) or the impact of European solidarity in the context of the fires in Greece.

21. A priori there is no preference for any specific communication tool or activity, but a case is to be made for more ‘integrated communication’, i.e. harnessing and combining different communication tools to reach a given objective. This applies particularly to large events such as conferences and European weeks/days, but also issue-campaigns. For instance, DG ECHO used a number of different instruments for the ‘Humanitarian Village’- campaign in Poland. This included advertising, the translation of a related computer game into Polish, the organisation of activities and ‘free’ publicity in form of TV, radio and press interviews in Poland as well as an article in the LOT in-flight magazine.

22. The Commission would benefit from better using the full-potential of electronic and web-based instruments. Instead of putting print-publication online as some DGs do, web-based communication works best when the opportunity of the medium is fully exploited and its constraints realised. For instance, the outreach to specialist stakeholders through conferences can be substantially improved through web-streaming and targeted digital marketing (email and SMS). Publications could be produced as presentations or video clips. The website can offer content to both European and non-European audiences when DGs use a common platform, such as the case of the development the ‘Global Europe’-brand and the ‘Europe in the World’-portal by the Relex Family of DGs.

23. Based on the inventory of common tools the Commission should seek to rationalise, streamline and prioritise the use of such tools. This proposal concerns mailing lists, translation, web-tools and in particular the issue of networks and relays. Some of these networks and relays address similar audiences and issues, so streamlining could avoid duplication and increase synergies. Some progress in this field is already being made, but we suggest that the Commission sets up a working group to investigate better cooperation between them (possibly within DG families). Ideally this will lead over time to an integration of networks with related target groups under a common framework.

3.3 Resources

Finding 13. As our study shows, the number of Commission staff engaged in communication tasks is not lower than that of government of a large EU member state (i.e. the German federal government) while the amount spent per citizen is indeed significantly lower.³ However, such a comparison must generally be seen with a lot of caution due to very different contextual factors, not least the divided publics and national media landscapes that the Commission faces. In light of the Commission’s ambitious objective of ‘going local’ (i.e. “*to convey information through the channels citizens prefer in the language they can understand*”), current resources can only be described as very stretched. Moreover, the strong decentralization of communication activities (including the respective budget) combined with the resource-intensive aim of ‘going-local’ hold a considerable risk of inefficient and ineffective use of resources.

³ See section 3.3.1 of the report.

Somewhat surprisingly, 86% of DGs surveyed stated that they target the general public and 68% of them even listed the general public as a ‘primary target audience’. Rather than individual activities being inefficient (most evaluation studies were rather positive), the greatest obstacle to the efficient use of resources is the piecemeal-approach, whereby every DG does a little, but no DG actually has the resources to effectively communicate with the general public on its own.

Recommendation

24. Since this study is drafted in the context of resource neutrality, better prioritisation of communication resources to overall institutional needs appears vital. We recommend that line-DGs should mainly concentrate on stakeholders, both as their immediate target audience and as multipliers towards the general public. If line-DGs address the general public *directly* this should be done either through cost-efficient tools (via the mass media, internet) or on the basis of clearly defined communication priorities (as set out in the annual ‘Commission’s Legislative and Work Programme’) in the framework of the so-called ‘priority project teams’. In return, being designated as a priority should bring measurable incentives for the DGs concerned with the communication of an issue, e.g. privileged access to resources of central services (DG COMM, DGIT, DGT, and SCIC). A coherent approach should be developed in the framework of priority project teams and the concerned line-DGs should be granted a leading role to guarantee ‘ownership’.

Finding 14. While there is no single benchmark available to measure the allocation of resources for each DG, it is clear that some DGs are richer in human than in financial resources in the area of communication (and vice-versa). A survey among DGs on their satisfaction with resources shows a mixed picture (see section 3.3.1, table 4), but not in all cases did the perceived situation reflect the actual percentage of communication staff as compared to the average of the respective DG-family. The research conducted for the study showed that differences between DGs do not always reflect current priorities but rather are a legacy of the past. However, remedies need to be considered on a case-by-case basis which goes beyond the scope of this study. Generally we found that the allocation of resources was very inflexible among line-DGs, REPs and central communication services.

Recommendations

25. If the Commission should opt for a re-allocation of human resources among DGs, decisions about potential (re-) distribution of communication resources should only be taken on the basis of clear criteria. We propose the following ones, which could be further operationalised by the Screening Working Group in the first instance and later by the proposed Communication Steering Board:

- Is a given DG expected to make a vital contribution to Commission communication priorities through their participation/chairing of priority project groups? The communication priorities for 2008 would need, however, to be further defined in terms of specific objectives.
- Is a given DG at the forefront of a limited number of new and potentially controversial political/legislative initiatives that have been planned and which require building stakeholder and political support, but have not been included in the top-five list of overall priorities?

- Is a given DG charged with particular strategic initiatives aimed at reforming and modernising central services, facilities and tools, which are used across the Commission (e.g. web-platform)?
- If a given DG performed well previously with regard to the communication priorities agreed in the annual work programme, this should be rewarded. Vice-versa, those DGs that do not perform well with regard to the communication objectives agreed could be penalised.

This list is non-exhaustive and other criteria could certainly be added to the list. Once this list has been agreed, however, it would mean that DGs that do not fit the criteria could lose resources, while others would gain.

Any re-distribution of resources should be subject to annual review and consultation procedures, which – besides the DGs concerned - should involve the Communication Steering Board (see above) and central services not presented in this Steering Board. The process should also take drafts of DGs' strategic communication plans into account in order not to disrupt planned initiatives and events. It should also consider that communication professionals are not an easily transferable resource, at least not if they represent specialisations in distinct areas, such as marketing, press-work, speech-writing or strategic planning. This option is the potentially strongest form of reallocation and holds the potential for considerable opposition among affected DGs.

26. As an alternative to definite re-allocation, it could also be considered to increase the incentives for flexible use of human and financial resources across the Commission. One possibility could be a scheme for 'staff loans' among DGs. It would have the great advantage of being less of an 'intrusion' for DGs and provide the Commission with greater flexibility. While such loans are already possible to some extent, there could be ways of making it easier to share human resources across the Commission. DGs that fulfil certain criteria (see the previous point) would have the right to 'loan' staff for a specific purpose and for a limited time from another DG, or a central service. DGs that loan to others would have the assurance of not 'losing' staff for good and the perspective to qualify themselves for extra communicators once they meet the criteria (e.g. if their policy area is identified as a communication priority). As the satisfaction concerning human resources and financial resources varies considerably across DGs, staff could be temporarily lent to another DG in turn for financial compensation, if demand for such a 'staff-for-money'-exchange exists. The loan scheme could be launched first within DG families where there are greater similarities concerning missions and potentially greater trust. The scheme would not have to be limited to communication priorities, but could also help DGs to deal more quickly and effectively with particular projects (e.g. web-applications) or policy initiatives (e.g. building support for a new policy initiative). The same could apply to the Spokespersons Service (SPP) whenever crisis communication is necessary. One would have to consider however (as for all temporary exchanges of staff) that the added value of the scheme stands in relation to its administrative and logistical costs.

Finding 15. The quality of the staff active in communication is the main key to working efficiently with resources and maximising impact. We did identify a skills gap in the Commission, particularly, but not only, at the level of AD officials.⁴ A concours for communication specialists is currently under way, but since it is for entry level AD-5 officials and given that vacancies are dependent on officials leaving, it will take some time to have an impact, especially at more senior levels. Other areas affected by the

⁴ See section 3.3.3 of the study.

skills gap that were mentioned to us are specialisations such as marketing and PR planning, web-design and web-journalism. Moreover, those who are active in communication cannot always use their skills to the best advantage, as they are often involved to a considerable degree in administrative duties. Finally there is the perception that communication performance is not yet recognised and rewarded sufficiently by DGs and the institution as a whole. This is an obstacle to attracting skilled people and keeping those who have important skills. Dealing with the skills gap is made more difficult by the lack of a sufficiently detailed overview of the kinds of expertise that the Commission currently has.

Recommendations

27. A review should be undertaken by DG COMM to make sure that the skills of the staff are used in the best way. This could be done by DG COMM in partnership with the respective line-DGs. Such a review could be the basis for identifying individual and strategic training needs. There is an example of good practice in the UK where a Government Communication Network (GCN) was set-up to strengthen the identity and skills base of government communicators and ensure portability of skills across different departments and ministries.

28. More opportunities for tailored staff training should be offered either through DG COMM or through external providers, with both short and long-term offers ('part-time degrees') to be envisaged. Some training sessions could become mandatory, at least for staff actively involved in communication tasks. Training sessions need to be made sufficiently attractive in terms of career progression and time-management.

29. For key strategic areas, the Commission and relevant DGs should consider recruiting senior communication managers as temporary agents (e.g. for marketing and campaigning) from the private sector with a competitive salary. This function may also be in part served by the Expert Advisory Group proposed further below. Recruiting temporary agents is however not resource neutral, unless this is otherwise compensated by a decrease in planned posts or savings from external contracting.

30. Wherever possible, communication and administrative functions should be exercised by the personnel with the best expertise. Easing the administrative load of communicators, by for instance, better division of labour between Representations and Headquarters, pooling administrative functions across DG families or 'regional REP-families' may be another option of administering more efficiently and freeing up time for communication work.

3.4 Evaluations

Finding 16. Over the last three years the situation concerning the evaluation of communication activities and programmes has markedly improved across the Commission. In interviews it was sometimes still denounced that the Commission lacks an 'evaluation culture' when it comes to communication, but figures support a generally positive trend: While there have only been 19 evaluations on communication-related issues (out of 678) during the period 2000-2005, there have been 18 during the year 2006 alone. In responses to our questionnaire, 62% of the 29 DGs/services surveyed stated they had carried out at least one evaluation of their communication activities since 2004 or were in the process of doing so. Scope and subjects of evaluations varied widely: They range from large campaigns and events to specific tools, stakeholder-relation and programmes. Three DGs (AGRI, AIDCO and RTD) have recently carried out comprehensive external evaluations of their information and communication

policies. In DG ECFIN and DG TRADE comprehensive evaluations are still on-going; DG REGIO's external communication policy is subject to permanent external evaluation.

Finding 17. At present DGs do not follow a unitary approach concerning the management of evaluations. Some apply a decentralised approach where the operational units are responsible for the evaluation of their own activities. In DG COMM, for example, the evaluation unit takes the role of coordinator and technical assistant, assisted by an internal network of evaluation correspondents in each operational entity. Other DGs follow a more centralized approach where the evaluation unit is directly in charge. It is impossible to say which approach is the better one, as both have their advantages and disadvantages. A centralized approach allows the in-house experts to manage the process directly (which can mean that operational units are less absorbed with managing the evaluation), while a decentralized approach potentially gives the unit concerned a stronger 'sense of ownership'.

Finding 18. A Commission working group on the evaluation of communication-related issues has taken up its work in March 2007 and is attended by officials from evaluation units of various DGs, although participation remains voluntary. Its main task has been described to us as two-fold:

- To act as a forum for the exchange of good and best practice where knowledge about evaluation of communication activities can be shared across DGs. This is especially relevant concerning the challenge of assessing impact (and not just output) of communication.
- To provide guidance for future evaluations with the goal to develop a "tool-kit" that every DG can use. The (voluntary) use of a well-made tool-kit should in a first step lead to a better understanding among DGs about their different evaluation practices. Over time it should result in common evaluation standards.

The working group collects good and bad practices and will present recommendations in 2008. It is in contact with the ECN when its discussions are of direct relevance for communication units.

Finding 19: In most cases evaluators were just asked to assess how efficient or effective the given action (programme, event, tool, etc.) has been in view of its general and specific objectives. It was hardly ever asked, however, to put the subject of the evaluation into a broader context and investigate how effective it was in view of other – perhaps similar or even identical – activities going on in other DGs or services.

Finding 20. As regards feed-back of recommendations from evaluations into the policy cycle, again no common procedure exists across DGs. However the information from questionnaires has provided the study with a large number of positive examples (see section 3.4.2 of the main study).

Recommendations

31. There is no one-size-fits-all solution as regards evaluation. The choice of different types of evaluation (internal, internal with external assistance, external) needs to be based on a number of considerations, e.g. the type of activity, its objectives, its size, the communication tools used, the target publics, and of course the budgetary constraints in terms of internal or external

resources. The same applies to the choice of methodology. Large evaluations should not rely on a single tool, but rather on a mix of tools.

32. Ex ante evaluations could be integrated into the decision-making process more systematically in order to identify in advance the needs of target audiences ('pull'- instead of 'push'-logic). This would also help to define more clearly the objectives and select the relevant target publics as well as the most appropriate tools. Such reflexion does not require expensive external studies, but an integrated reflection during the preparation of any communication activity.

33. Especially for large communication projects, evaluation should be built into the planning- and implementation process right from the beginning and it should go beyond just reporting on output. Outgrowth should be noted and impact should be evaluated by external professionals. Evaluators would need to be involved from the outset when large scale actions which involve considerable human and financial resources are designed. Their results should feed back into the process immediately. Reporting systems (e.g. for the Representations) could be streamlined and improved, also with a view to reduce the time spent on them by communication staff.

34. DGs with small budgets should also explore more cost-effective alternatives to external evaluations. These options include using secondary analysis and data that is available elsewhere (but data should be current and indicators valid and relevant) or 'piggybacking' by putting survey questions aboard others' existing surveys. Also, smaller samples could be used, as there is not always a need for 1000 respondents in order to know whether a communication measure works in principle. Even very small qualitative investigations can sometimes deliver valuable and detailed insights (e.g. why messages are rejected or what aspects were valued most). Casual low budget evaluation, such as leaving questionnaires at events (or even press conferences) often suffices to see whether actions were appreciated, and what could be improved (See the methodological annex of the study for references).

35. There are also cheap (even if scientifically less rigorous) ways to market-test whether a communication instrument is likely to be effective. One example is, for instance, circulating draft publications to peers, other institutions or networks for feed-back. With little research and through contacts, it can also be found out who is likely to attend certain events, in which numbers and for what purpose. The Commission could even consider a small 'focus group service' to test certain messages in a small cost-effective way with different groups of citizens.

36. Finally, self-evaluation and readiness to learn from instruments and activities that have not worked not so well in the past are of key importance. Between 2004 and 2006 many DGs as well as OPOCE have been reviewing their publications policy in order to reduce the number of publication titles and have started to move from print to online publications for specialist audiences.

4. Communication Support Services

Finding 21. Most line-DGs appreciate the high quality of the communication support functions, but are dissatisfied with their accessibility and overly long response times. One reason for the delays are that resources within the support DGs are often stretched, particularly regarding translation services (DGT), but also in SCIC, OPOCE and DG COMM, and to a lesser degree in DIGIT. Communication support DGs have restricted access rights either on a first-come-first-served basis or by autonomously developing a set of criteria for prioritising access. Vice-versa, line-DGs have responded to the gap between the services needed and those that are available in two ways: building up their own communication resources and tools and - where this is not cost-effective or

possible - by external contracting. The first response limits the efficiency savings that could be realised for the institution as a whole, while the second poses the risk of paying more for services of fluctuating quality (see also Finding 23).

Finding 22. Beyond the issue of prioritizing scarce resources, the study found insufficient communication between ‘providers’ and ‘clients’ about the kinds of services needed and how to best access them. Communication support services are sometimes faced with insufficiently specified requests with regard to technical aspects, but also concerning target audiences and effects. On the other hand, line-DGs find the procedures for accessing some of the services overly bureaucratic and communication difficult. Currently, there are no pecuniary incentives for communication support DGs to improve their service levels and attract more ‘business’ from line-DGs.

Recommendations

37. DG COMM could take the initiative of setting up a group of all communication service providers to better identify, co-ordinate and optimise the services generally on offer by the Commission and OPOCE. This could help to eradicate overlaps in services, realize economies of scale and use freed-up resources to improve stretched but vital services.

38. A structured dialogue between central services and service users should be set up in order to better identify user needs, inform them on what kind of services are available and how to best access them, and finally, to agree priorities for accessing stretched resources and tools. This dialogue can build on the process already achieved in this domain in the ‘Planning Ahead’-group of the ECN.

39. Performance indicators could be agreed (e.g. response times to certain requests) and, crucially, performance could be connected to resource incentives. In the case of the UK the government’s Central Office for Information (COI) depends for its own resources on attracting ‘business’ from its ‘clients’ which are the other governmental bodies, such as ministries and agencies. While this market-model is not directly transferable to the Commission for a number of reasons, one could envisage a mechanism through which communication support DGs are rewarded by line-DGs for gaining their business. In turn, line-DGs save the money and time they would otherwise devoted to external contracting.

40. Such a ‘market-model’ of a relationship between central services and line-DGs could be complemented by mandatory co-operation with central services (rather than external contractors) in those areas where economies-of-scale can only be realised through pooling resources, for instance, large framework contracts. Pooling of resources can also be envisaged in sufficiently generic communication support functions in the area of e-communication and web design. DGs could be encouraged (and if necessary directed) by the proposed Communication Steering Board (see Recommendations 3), to assist central services with developing large infrastructure projects (content management system, secure communication mechanisms). However, if the Commission decides to centralize certain communication support functions, we recommend a gradual approach to build trust among line-DGs and ensure that service levels have the capacity to meet expectations.

Finding 23. The vast majority of DGs extensively use external contracting in order to get key expertise and additional resources for particular tasks (see also Finding A). However, the report found a considerable level of dissatisfaction and frustration with the quality of the work offered by some of the contractors. Competitive calls for tender too often still result in bids from a fixed circle of 4-5 medium-sized firms. Given the particular specialisation of these firms and shifts in personnel among them, the

Commission has de-facto little choice over who is given a contract, and therefore little possibility to avoid less well-performing contractors in the future. The report identifies two main reasons for this lack of competition: the money on offer does not usually interest the major international consultancies and the difficulties in using the tendering process most effectively so that it attracts more bidders and ensures competition on quality as well as on price.

Recommendations

41. In order to interest the most professional firms and stimulate competition, the Commission could intensify its efforts of creating more large volume framework contracts. These firms could be also charged with offering integrated communication services for different line-DG and the Commission as a whole. While a one-stop-shop for the search of existing framework contracts in the Commission has been drawn-up, it should be developed further to improve user-friendliness in terms of function and content.

42. It might be also useful to conducting a review of the reasons why some calls for tender have failed to attract sufficient interest and delivered on the quality criteria. While there is already training offered on public procurement, procurement for communication services may require a more tailored approach. Therefore, DG COMM, perhaps jointly with DG BUDG, could consult with members of the ECN to identify training needs and organize training sessions on how to write tender specifications in way that opens the markets and guarantees value-for-money.

5. The Commission's Representations in the Member states

Finding 24. In the last seven years, the Representations have suffered from a misfit between objectives and means. The mandate was enlarged continuously, but staff and budget remained basically the same. Only for pilot Representations – and even not necessarily for all of them – sufficient staff has been provided for living up to the tasks formulated in the current mission statement of the Representations.

Recommendation

43. Based on our analysis (see Chapter 5 of the main study for greater detail), we cannot recommend redistributing staff and budget *among* Representations. Even the better equipped Representations are certainly not overstaffed and mostly just above the line of being able to function well. It would also risk undermining the progress that we detected in the three pilot representations we visited. In the current context, redistribution among REPs would lead to a situation where all REPs would end up understaffed, only some less so than others. We therefore only see two realistic options: Either additional staff would have to be provided or the mission of Representations would have to be cut back. Since the latter would question the entire approach of 'going local', we recommend thinking about a mix of both more long-term (AD) staff as well as flexible arrangements providing more human resources to the Representations (see also above, recommendation 10).

44. We recommend developing a formula that would allow for determining the core communication needs of each Representation ('critical mass') based on two factors:

- the size of the population to be catered for, and
- long-term public opinion trends.

The inclusion of additional factors (e.g. particular national sensitivities, the political agenda of the national government, strategic importance of a country or even its federal/centralist institutional set-up) is useful only if the criteria are transparent and traceable, which excludes

the use of too many ‘soft’ factors. Too many soft criteria are likely to undermine the entire rationale of establishing criteria.

45. The need for flexible solutions due to short-term national specificities could be tackled through ‘floating staff’ added to Representations on a short-term basis and provided by the DGs (see also recommendation 11). One could for example imagine a team of communication staff that rotates among Representations together with the presidency. Another team could rotate according to where short-term challenges arise (i.e. referenda) or where a special need for communication on priority issues or key legislative initiatives is detected.

46. As a short-term improvement for heavily understaffed Representations in some smaller Member states, it could be envisaged that those situated close to Brussels, will be provided with support through Commission officials coming for limited missions of several weeks or months on specific matters from Brussels. Similarly, smaller REPs that are geographically closer to larger ones could get support from the latter. Overall, however, we think that increased short-term flexibility measures alone are not going to solve the problem of understaffing and that they should always be assessed in relation to the logistic efforts and the commotion caused.

Finding 25. Our assessment of the pilot experience shows that Representations have significantly improved their output both in quantitative and qualitative terms (see Chapter 5 of the study). The additional resources have led to a marked increase, often a doubling of output, compared to the situation before. As regards *impact*, an increase could be confirmed for individual activities, but on the basis of the current pilot reporting system, we were not able to make a structural comparison assessing whether there was a *general* improvement in impact across all pilots for all activities. It has to be said, however, that measuring impact of communication activities in a meaningful way is a particularly difficult task and in many cases it involves costs that stand in no relation to the costs of the activity evaluated. Moreover, it appears realistic that the considerable increase in general output and also in the quality of output due to the pilot exercise also justifies the assumption of a general increase in impact.

Recommendations

47. On the basis of our findings, we recommend to continue the pilot exercise and to extend it to further Representations, which can establish a clear need and purpose for additional human resources. This should only happen under the condition that REPs submit convincing applications, thus proving the need for and the concrete purpose of additional communication staff. As before, the additional personnel should have to qualify for communication tasks and should be provided to the Representations in a competitive procedure. The renewal of the posts should also again be subject to an evaluation of the exercise, however, this time with a stronger view to the *general impact* of pilot staff. The reporting tool should be adapted to allow for an impact assessment not only of individual activities, but of a more general scope.

48. While we welcome the fact, that the pilot exercise is continued only after positive evaluation, it does not benefit long-term planning, if the decision on whether and how to continue is only taken at the very last minute. Learning from the experience of this year, the evaluation should take place well before the time is up for the next officials and contractual agents. Staff must know at least half a year in advance whether their contracts will be renewed. Representations should know one year in advance whether their pilot status will generally be extended. At the same time, we recommend that all pilot posts should *not* just be renewed automatically. Some missions may be finished or can be scaled down. Other pilot projects should be started. All this should depend on good applications by the Representations.

49. Plans to generally replace all pilot officials with contractual agents are problematic. While it is certainly true that local knowledge and personal commitment are important factors that are not necessarily linked to the status of staff, it must be stressed that AC posts do attract applicants with a different profile. Since salaries are significantly lower and job security can only be provided to a very limited degree, it is not surprising that many professionals with top qualifications cannot be attracted in the first place. The fact that a number of AC posts are currently vacant also illustrates that contractual agents use the exposed position in Representations to move on ‘to something better’, which damages the effective continuation of certain communication activities. We therefore recommend looking closely at how the current pilot personnel are replaced on a case by case basis. Accordingly, some contracts could be renewed and others should end. Some posts should be filled by officials and yet others by contractual agents.

50. In view of their limited resources, we recommend that Representations should set still stronger priorities concerning how and to whom they communicate. As regards activities aimed at the general public, Representations should scale down external communication activities that do not reach thousands of citizens in each country. This would also mean an adaptation of the ‘going local’-approach: while the work with local and regional media should be further extended, we recommend scaling down the number of seminars – however, with the marked exception of seminars for key multipliers, such as journalists and teachers. Participation in public presentations, fairs and openings should also be assessed under the aspect of their potential for multiplier effects: Representations should only become involved if either thousands of citizens can be addressed directly or if a strong multiplier effect through national (regional, local) politicians, journalists, teachers or mass media is ensured.

The External Communication Activities, Tools & Structures of the European Commission Lessons Learned & New Avenues Main Report

**Prepared for the Screening Working Group
of the European Commission**

Sebastian Kurpas, Christoph Meyer & Michael Brüggemann

1. Introduction: Purpose, Context and Methodology

1.1 Purpose, Subject and Scope of the Study

The overall purpose of this study is to provide expertise and research-based recommendations to the screening Working Group of the European Commission, which is currently engaged in scrutinising the Commission's communication activities, tools and resources. The objective is threefold:

- 1) to examine whether the financial and human resources allocated to communication activities within the Commission enables the communication objectives to be met,
- 2) to present recommendations to the Commission on the best possible fit between the Commission's external communication objectives and current organisational arrangements, in terms of governance structures, mandates, allocation of responsibilities, financial and human resources, budgets, negative priorities, and
- 3) to analyse the evolution of the mandate given to Representations and evaluate the added-value of the reinforcement of the pilot Representations. Further specific goals were listed in the terms of reference.¹

This study is based on a broad definition of external communication as the management organization-stakeholder relationships.² The definition of stakeholders varies according to the objectives of external communication and can range from the general public to very narrowly defined groups affected by or involved in a specific policy area. The study is therefore not limited to activities aimed at the general public although reaching ordinary citizens has been a key objective of the new initiatives. It is also important not to confuse potential objectives (e.g. disseminating information, raising awareness and changing attitudes) with the broad term of communication as encompassing all the activities, tools and instruments employed to reach such objectives. While internal communication is not the focus of our study, we do at time have to look at how the Commission communicates and co-ordinates internally as these functions directly

¹ Invitation to tender PN/2007-30/D.

² Grunig & Grunig, 2001; Hon, 1998; Lindenmann, 1998.

impinge on the ability of DGs and in particular the representations in member states to reach their objectives.

It should be pointed out that this broad remit, in combination with the extraordinarily tight timeframe for the delivery of the study, requires a degree of selectivity regarding the above points. The study will not systematically assess each and every activity undertaken by the various DGs and Services. Where necessary, we concentrate on those activities, tools and evaluations that appear most relevant, either because of their costs, or because they relate most closely to the Commission's highest communication objectives.

Moreover, this study is not and cannot be an evaluation of the success of the communication activities as such, as we do not gather and analyse primary data during or immediately after activities. It does, however, draw on existing evaluations regarding the 'success' (efficiency, effectiveness/relevance) of varying communication activities coupled with an evaluation of the communication processes, structures and resources measured against best practices drawn from the scientific state of the art.

1.2 Political Context and Key Constraints

The Commission has started an ambitious programme of reform of its external communication activities in virtually all respects, which is epitomised by the Action Plan, the Commission White Paper on Communication and the Plan-D. The declared strategic goals are to engage in two-way communication with citizens and build a European public sphere in which democratic opinion formation by discursive means becomes possible. New Commission-wide communication objectives were agreed for the first time in 2007 and new structures and services were established and reformed.³ The resources allocated to communication activities also rose over the last five years and the Commission recently launched its first recruitment competition for A-grade officials in the area of communication.

Despite all these new initiatives, resources, measures and the ambitious goals, it is crucial for the purpose of this study to keep in mind key external and internal constraints inevitably limit both the pace and scope of change. These constraints have been well documented in the literature⁴ and primarily relate to the objective of reaching non-elite target audiences. In its communication on "Communicating Europe in Partnership", the Commission summarised its aims as follows:

³ See Annex to the Commission Legislative and Work Programme 2007, COM (2006) 629 final, p. 35, at: http://eur-lex.europa.eu/LexUriServ/site/en/com/2006/com2006_0629en01.pdf

⁴ Marc R. Gramberger, *Die Öffentlichkeitsarbeit Der Europäischen Kommission 1952-1996: PR Zur Legitimation Von Integration?*, Baden-Baden: Nomos, 1997; Christoph O. Meyer, "Political Legitimacy and the Invisibility of Politics: Exploring the European Union's Communication Deficit," *Journal of Common Market Studies*, Vol. 37, No. 4 (1999), pp. 617-639; Christoph O. Meyer, *Europäische Öffentlichkeit Als Kontrollsphäre: Die Europäische Kommission, Die Medien Und Politische Verantwortlichkeit*, Berlin: Vistas, 2002; Michael Brüggemann, Julia De Clerck-Sachsse, and Sebastian Kurpas, "Towards communication? Evaluating the activities of the European Commission in the field of communication". Brussels: Centre for European Policy Studies, 2006.

To reinforce its communication activities by providing information and engaging in debate and discussion with citizens in national, regional and local contexts, thus promoting active European citizenship and contributing to the development of a European public sphere.⁵

Yet the potential target audience is composed of almost 500 million citizens and is characterised by its linguistic, cultural, political and social diversity. The foremost difficulty is that only about one half of European citizens can communicate in a second language other than their mother-tongue and only about a third can do so well enough to have a fluent communication in English.⁶ Multilingualism remains the biggest challenge for the Commission's external communication.

A legacy of past neglect for communication with the general public (and news media that could reach the general public) continues to show its effects with citizens having low levels of knowledge about EU policies, institutions and processes.⁷ Coverage of the EU as a proportion of overall political news coverage remains rather low, in particular in the regional and the audiovisual media as well as those aiming at the popular mass market (red tops/tabloids). National school curricula have in general not or only recently adapted to providing citizens with basic knowledge about the EU. Hence, many of the EU's unique institutional and governing characteristics remain opaque to ordinary citizens. This means not only that institutional roles are often misattributed, but also that there is a higher than usual level of uncertainty concerning opinions on EU issues and how citizens' preferences relate to electoral choices available. This large cognitive gap between EU governance structures and ordinary citizens cannot be overcome in the short or medium term and certainly not by the Commission alone. In a process of belated adjustment to the legislative initiatives and institutional deepening of the late 1980s and early 1990s, mass media attention paid to EU governance has grown over the years from a modest level, particularly in the printed press and in Northern European countries.

Coverage in the audiovisual media has risen more slowly. The most visible expression of the trend of a gradual mediatisation of EU governance can be seen in increasingly-corresponding figures in Brussels, which have doubled over the past 15 years. The salience of EU issues has also increased in domestic politics due to the rise of Eurosceptic parties and the pressure on governments to call referenda on EU treaty reform. Discussions about the introduction of the euro, the Service Directive or the proposed accession of Turkey have given rise to transnational debates and have increased the politicisation of treaty reforms and governance in Brussels. As media attention to EU governance increases, the European Commission has been faced with new expectations from the news media, particularly those based in Brussels. Despite the Commission's competence as an independent initiator of new policies, it remains very

⁵ Communication from the Commission: "Communicating Europe in Partnership", p. 5, COM (2007) 568 final, at: http://ec.europa.eu/commission_barroso/wallstrom/pdf/COM2007_568_en.pdf.

⁶ "Europeans and Languages", Special Eurobarometer 237, EB63.4, September 2005, p. 4/5, at: http://ec.europa.eu/public_opinion/archives/ebs/ebs_237.en.pdf.

⁷ See: Standard Eurobarometer 66, December 2006, p. 154, at: http://ec.europa.eu/public_opinion/archives/eb/eb66/eb66_en.pdf.

dependent on member states and increasingly also on the European Parliament to ensure that its proposals become law. In a considerable number of policy areas, unanimity in the Council is still the rule and particularly large member states can de-facto veto initiatives that they see as a violation of essential national interests. In the past the Commission has often been forced to tone down its public communication in order to make a legislative impact. While aiming to avoid antagonising member states, the Commission enabled national governments to claim policy success for themselves and to blame failure on the Commission. As the Commission intends to be seen as the neutral defender of the community interest (i.e. above both party and national interests), it needs to secure its mediating role with the result that the Commission cannot engage in public discourse like a national government. Policy constraints thus often win over communication interests. Under the current system and related to the previous point, there has been a fundamental lack of incentives for member states to demonstrate public solidarity with jointly taken European decisions and policies (except when holding the EU presidency). As a result, the Commission lacks a co-communicator on the side of the Council as the major decision-maker in the EU system. Also the EU presidency has not been such a player due to the rotation principle and member states have not been willing to devote substantial additional resources to the Commission. This means, firstly, that the Commission's external communication activities have been under-resourced in the past, particularly with regard to citizens' communication on political projects such as the Single Market Programme or Eastern Enlargement – to name just two major initiatives. Secondly, it also means that the Commission is structurally overburdened as the most visible face of the EU to the public, both in terms of legislating/decision-making and communicating.

Internally, the Commission still suffers from the legacy of the long-standing institutional neglect of external communication with audiences other than a narrow circle of stakeholders. Until the Maastricht ratification crisis, media publicity and very visible public communication campaigns were seen as detrimental to fostering compromises and consensus among national governments and experts and was therefore avoided, or at best not encouraged. While this perception has changed substantially after a number of referendum results and the resignation of the Santer Commission, the legacy of this low prioritisation is still visible throughout the organisation: its personnel resources, its governing process, its rules and regulations regarding recruitment, contracting and procurement as well as many other unwritten informal norms and perceptions. This study is in large part an attempt to make the numerous obstacles visible and suggest recommendations for change. Reforming the Commission's external communication is a long-term process and efforts should be seen as part and parcel of a broader ongoing process of reform affecting the whole of the Commission as it comes to terms with its changing role in an increasingly demanding political and media environment.

1.3 Methodology: Evaluating External Communication

The study aims to measure the reality of external communication against good or even best practices and benchmarks. In identifying best practices, we rely on three main perspectives. First, we draw on the existing state of the art in public communication to set out best practices across four dimensions of the communication process:

- setting priorities and objectives,
- choosing tools, allocating resources,
- evaluation and
- intra-organisational co-ordination of communication.

The best practices are framed in terms of questions for each of the phases and have informed the interview process. The review of the literature from which these best practices have been derived is contained in the annex and the literature itself quoted in the bibliography.

Second, in order to complement gaps in the literature on the communication of public bodies, we have conducted some research at the national level looking at the cases of Britain and Germany. These two countries represent quite different political set-ups and media environments, but are both large member states. Both models offer relevant lessons about generic issues concerning the interplay between line ministries and central services and to some extent also for the allocation, use and development of human resources in the area of public communication. We have conducted interviews with officials and consulted official documents and reviews to underpin this perspective.

Finally, the study draws on the research within the European Commission itself to learn from practitioners about best practices and lessons learnt from failures. While there may be experiences that are applicable only to one or a small number of DGs, there are also a number of lessons to be learned for the institution as whole about what works best. This applies not only to communication activities and tools, but also to issues relating to the allocation of resources and practices of cooperation within the DG itself, with central services and with horizontal services. We have relied upon officials' first-hand experience to identify key problems regarding each of the stages in the communication process.

The following section outlines a set of questions generated from the literature review (Annex 3), which we have used in the research process. Each of them embodies a good practice in the external communication of the European Commission. Seen together they can be used as a model of what public communication within the European Commission should look like across the five dimensions of the communication process.

1. Defining the problem, setting objectives, identifying target groups

Does/do the Commission/line DGs listen to the various stakeholders when identifying problems and communication priorities?

Does/do the Commission/line DGs clearly and appropriately define what the target group is for different objectives and priorities?

Are the objectives themselves specific, measurable and realistic?

Do the objectives distinguish between different kinds of effects such as knowledge raising, influencing attitudes/relationships or changing behaviour?

2. Choosing communication instruments

Is the choice of communication instruments clearly related to a) target audiences and b) intended effects?

Are communicators aware of the relative strength and weakness of different media/tools of communication? If not, can they rapidly gain access to such expertise within the organisation, for instances, by accessing databases with best practices?

Does the choice of communication instruments adequately reflect the relative cost-efficiency ratio of different communication tools? Are opportunities for attachment to news events or partners exploited?

Are budgetary and human resources constraints/requirements adequately taken into account in the choice of communication instruments?

3. Allocating and using resources efficiently

Does the Commission have sufficient financial and human resources (including expertise) to reach its objectives? Is the resource allocation in sync with the prioritisation of communication objectives?

Does the Commission have the right kind of personnel to discharge various communication tasks effectively? Does it have an effective training programme in place to develop the skills of existing staff and does it motivate staff by rewarding good performance?

Are the human resources allocated in a way that allows discharging these tasks most efficiently and effectively (e.g. the balance between centre, DGs and support services)? Does the Commission have sufficient flexibility in allocating human and financial resources to different tasks depending on their present or anticipated importance to the institution and stakeholders?

When contracting out communication tasks, is the Commission able to get the best kind of service at the best price on the market, and exercise sufficient control to ensure that it gets precisely what it wanted?

4. Evaluating communication: Strategy & methodology

Does the Commission routinely undertake, resource and encourage *ex-ante* and *ex-post* evaluations of communication activities?

Do the indicators used in evaluations allow for measuring objective achievement and impact with sufficient relevance and validity, and do they conform to the effect levels targeted in the objectives?

Are the decision-makers aware of the relative strength and weaknesses of different evaluation techniques, including cost-benefit ratios?

Are the results of evaluations fed back not only into future communication programming, but also staff recognition, future problem-definition and objective setting?

5. Coordinating & structuring of communication activities

Is there an appropriate mechanism/process for aligning what the Commission wants to do in policy terms with its communication objectives?

Are there mechanisms in place to ensure that DGs make their appropriate contribution to the achievement of the priority objectives for the institution as a whole? Do these

mechanisms ensure that thematic synergies across DGs are realised and that duplication and contradictions are avoided?

Are communication units/staff within line DGs an integral part of the horizontal decision-making and forward-planning process?

Does the relationship between line DGs and central service DGs allow for the most efficient and effective use of different communication tools?

1.4 Sources of the Study

The elaboration of good practices in the external communication of public bodies has been largely based on the relevant scientific literature. Where appropriate, we have also made references to official and semi-official documents of Commission and other EU institutions, including member states. There has been for instance a root-and-branch review of the UK communication policy and structures in 2003, the so-called ‘Phillis Review’,⁸ which led to a number of changes in the set-up of communication functions.

In order to empirically analyse the key questions raised for the different phases of the communication processes, we are grateful to have been able to draw on data and other materials submitted to us by various DG and units within the Commission. These include in particular the following:

- detailed communication strategies, priorities, activities, actions, at various organisational levels of the Commission, in particular at DG-level;
- statistical information about the budgetary and human resources employed for the above;
- annual activity reports and strategic plans of the Commission and the various DGs; and
- evaluation reports and studies relating to the above activities, including the 2006 draft screening report on communication resources prepared by DG COMM.

To supplement the information contained in the written documents listed above, a questionnaire was sent to various DGs (see Annex 2), soliciting in particular:

- descriptions of ad-hoc, medium and long-term co-ordination of information activities, inside and outside the DG;
- the processes and criteria involved in anticipating, monitoring and assessing (ex-post) the efficiency and effectiveness of communication activities; and
- the most notable changes over the last five years affecting the communication activities in terms of budget, priorities and co-ordination.

Interviews were conducted with officials responsible for communication activities at relevant positions throughout the Commission as well as in Britain and Germany to elaborate and discuss questions of adequacy, efficiency and effectiveness of particular tools, structures and resources. These interviews were conducted under conditions of

⁸ See <http://archive.cabinetoffice.gov.uk/gcreview/News/FinalReport.pdf>.

anonymity of the sources, but passages are cited where they do not reveal the identity of the speaker.

Pre-existing data from public opinion polls (Eurobarometer) were used where appropriate.

1.5 Structure of the Study

The study is divided into four main empirical chapters, which contain the main findings.

Chapter 2 analyses the co-ordination and governance structures of external communication within the Commission.

Chapter 3 focuses on the communication of line DGs in a comparative perspective, looking at four main aspects: ‘objectives’, ‘activities’, ‘resources’ and ‘evaluation’. The goal is to go beyond individual cases and arrive at broader lessons as they apply to the majority of DGs or at least to particular families of DGs.

Chapter 4 analyses the interaction and co-ordination between line DGs and DGs with a communication support function that provide access to communication expertise, services and tools.

Chapter 5 focuses on the way in which the Representations of the European Commission have performed, comparing in particular the ‘pilot’ against the ‘non-pilot’ representations.

A summary of the study with the main findings combined with recommendations and options for change is presented at the beginning of the study.

Finally, the study contains a list of references sources cited and an annex containing particular key documents, tables and figures.

2. Co-ordination and Governance of Communication

This chapter focuses on questions of co-ordination, synchronisation and governance of communication activities. Co-ordination cuts across the major phases of the communication process in a public organisation, but still constitutes a distinct challenge for the organisation as a whole, its constituent parts and relations with outside partners. In principle, co-ordination and governance can apply to different dimensions of the communication process, as follows:

1. *Co-ordination of legislative/regulatory action and communication.* When planning legislative or regulatory action, communication priorities and tools are considered not only in terms of timing, but also in substantive terms to learn about the needs of the audience and to provide information about the essence of legislative initiatives.
2. *Co-ordination of content/message.* An organisation communicates coherently with different target audiences once objectives and priorities have been defined.
3. *Coordination of resources.* This ensures that the right resources are where they are needed most, i.e. resources follow priorities and needs.
4. *Co-ordination of activities.* This allows to achieve synergies/economies of scale and to avoid duplication of activities through pre-planning and co-ordination.

Furthermore, as we suggested in the introduction, the answers to the following set of questions can be used as an indicator of the performance of co-ordination mechanisms and governing structures:

1. Is there an appropriate mechanism/process for aligning the Commission's aims in policy terms with its communication objectives?
2. Are there mechanisms in place to ensure that DGs make the appropriate contribution to the achievement of the priority objectives for the institution as a whole? Do these mechanisms ensure that thematic synergies across DGs are realised and that duplication and contradictions are avoided?
3. Are communication units/staff within line DGs an integral part of the horizontal decision-making and forward-planning process?
4. Does the relationship between line DGs and central service DGs allow for the most efficient and effective use of different communication tools?

In this chapter we attempt to approach the first three sets of questions by focusing on different levels of co-ordination: the *horizontal* level (College & Commission), the *bi- and multi-lateral* level (between specific DGs and services), the *vertical* level (between Commission/DGs and the Representations in member states), the *external* level (with EU institutions and member states) and the *intra-DG* level. Given the importance of the fourth question about the relationship between line DGs and Service DGs, we cover it separately in Chapter 4.

2.1 The College and Commission-wide governance

2.1.1 Setting priorities / aligning with action / resources

The reform of the process of communication governance, including the setting of priorities, has been initiated by the Action Plan. If an organisation fails to set communication priorities and objectives, it has very little to co-ordinate regarding questions of message, resources and action. Until very recently, the Commission had not established such priorities and objectives. The first set of communication priorities were spelled out in the annex to the Commission Legislative and Work Programme (CLWP) for 2007.⁹ The communication priorities for 2007 were brought in as an afterthought to setting political priorities, which is apparent both in terms of the sheer number of priorities and their thematic focus. For 2007, the list contained altogether 19 priorities listed under various headings (prosperity, solidarity, security and freedom, Europe in the World and Future of Europe). If everything is a priority, nothing is. Moreover, a degree of confusion frequently emerged in our interviews about these communication priorities and political priorities contained in the Work Programme.

Apart from the high number of communication priorities, it was not clear to us how the specific concerns and needs of different stakeholders and citizens were brought into the process of setting either political or indeed communication priorities. Despite the statement to this effect, it is not clear whether and how systematically research, public opinion analysis and media monitoring were employed to ascertain these priorities, such as the ‘Market Access Strategy’.

The Annual Policy Strategy for 2008 attempts to address both issues, by cutting down the number of priorities to seven: Budget Review, Single Market Review, Social Reality Stock Taking, Migration, Institutional Settlement, Energy and Climate Change and the EU’s Role in the World.¹⁰ It also emphasises that priorities for 2008 were rooted in public opinion findings about broad ‘concerns’ of citizens in three main areas: fears of job loss related to globalisation, migration and an interest in energy and climate change. The second criterion mentioned is that issues should be selected “with which the citizen can more easily identify” and “The European institutions should play a clear role in areas where they communicate”.¹¹ While these points provide a better explanation of the criteria for setting the priorities, they do not seem to have been consistently and systematically applied. Political priorities for 2008 such as ‘Budget Review’, ‘Single Market Review’ and ‘the Institutional Settlement’ cannot be plausibly traced to any of the criteria formulated in the Annual Policy Strategy for communication priorities.

The third problem in relation to priorities is that they are still very broad and provide little guidance as to what exactly the intended effects concerning these different priorities should be: providing information and raising awareness, changing attitudes and advocacy or even changing behaviour? While the CLWP or the APS may not be the

⁹ See Annex to the Commission Legislative and Work Programme 2007, COM (2006) 629 final, p. 35 (http://eur-lex.europa.eu/LexUriServ/site/en/com/2006/com2006_0629en01.pdf).

¹⁰ Communication from the Commission: Annual Policy Strategy 2008, COM (2007) 65 final, pp. 16-17 (http://ec.europa.eu/atwork/synthesis/doc/aps_2008_en.pdf).

¹¹ *Ibid.*, p. 16.

best place to spell this out, we did not find any other document that would operationalise these annual priorities in a way that would be helpful for guiding co-ordination at the lower-level (key messages, intended effects, identified needs), particularly the project teams. Some project teams have addressed the issue by developing their own mandate and were assisted by ‘the catalogue’ developed by DG COMM (see page 20), but ideally the setting of specific objectives should be done at a higher and horizontal level to provide clearer guidance.

However, progress has been made towards better planning of the legislative calendar to prevent an oversupply of ‘good news’ at certain points. The Secretary-General (SG) attempts to cluster legislation to allow for better co-ordination between various DGs. This would also have a positive impact on the communication of initiatives. All DGs, including DG COMM, are consulted on the formulation of the legislative calendar. However, we have not seen evidence that communication aspects are systematically considered at this stage, for instance the annual ebbs and flows of news supply and demand, hostile or advantageous news environments as related to scheduled international summits or national elections.

Given the relatively late agreement of the communication priorities for 2007 in the process of developing the CWLP and the budget, we could not find that the communication priorities were taken into account in the budgeting process. This may change for the priorities of 2008, as there is at least the prospect that the budgetary implications of communication priorities are considered and resources will be made available to support the identified priorities. For the current year, however, budget resources did not follow communication priorities at the institution-wide level. This has had in some cases negative knock-on effects for the degree to which DGs have devoted their own resources to communicate on institution-wide priorities. An added complication is that some DGs such as REGIO and AGRI operate within a seven-year budgetary cycle and are constrained in the way they can shift resources by existing regulations (see also section 3.3).

2.1.2 Leadership in Implementation

As a governing structure for political follow-up to the communication priorities, the Group of Commissioners for Communication and Programming foreseen in the Action Plan has been dormant after a limited time of operation. Due to the College structure it was not empowered to take the decisions needed. The generic mechanism for ensuring compliance with the policy programme from February of each year onwards is a bi-monthly meeting of the cabinets led by the President’s Cabinet with strong involvement of the SG and the Spokesman’s Service (henceforth abbreviated SPP for Service Porte Parole). These meetings, however, are focused on the work programme-planning and agenda-setting of the College meetings. The SPP is focused on co-ordinating action with regard to issues of immediate interest to the media, in view of its mandate to ensure short-term planning. The SPP also participates in the meetings of the Heads of Cabinet, including the Head of Cabinet of the Communication Commissioner, which gives further possibilities to set a news-friendly agenda. There are thus some provisions for the involvement of communication services in the implementation of the policy programme.

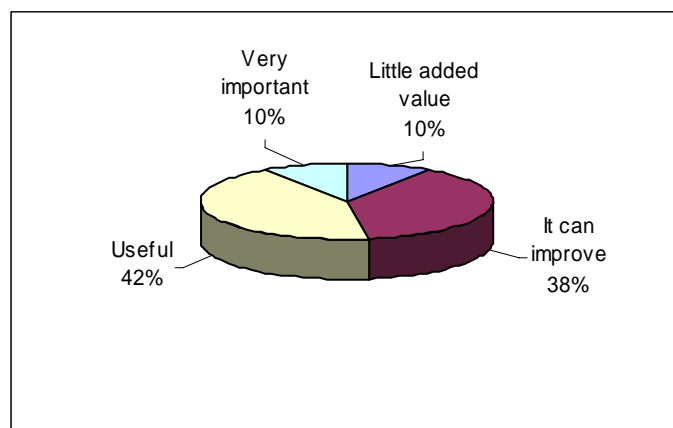
Beyond agreeing communication priorities, however, a co-ordination gap exists at the institutionalised horizontal level with regard to aligning communication and policy objectives. Although the participation of the Director General of DG COMM ensures that communication considerations are represented, the weekly meetings of Directors-Generals led by the Secretary-General do not include communication as a standard agenda point for discussion. While the College follows in-depth topical policy issues, there is no systematic and regular decision-making or planning with regard to strategic public communication after the suspension of the Group of Commissioners for Communication. In order to make communication a mainstream consideration in the operational and strategic life of the Commission, one interviewee suggested that “not more, but higher level co-ordination is needed”.

DG COMM has the overall responsibility for ensuring the implementation of the Commission’s communication priorities. It is formally in charge of delivering the communication priorities and has initiated the so-called ‘priority project teams’. Some of the thematic project teams (climate change) have delivered good results and developed some new initiatives, but other teams still lack the necessary leadership and commitment from DGs. The project teams depend very much on goodwill co-operation and the willingness and policy-related skills of individual DGs to act as chair or co-chair, since knowledge on the specific policy cannot be provided by DG COMM. It emerges from the interviews that DG COMM is not yet able to energise, lead, monitor and support a large number of thematically-oriented project teams on its own, and certainly not without the full engagement of the relevant DGs. This may partly be a consequence of the fact that the implementation of priorities was not linked to particular resource incentives in the past (see above). DG COMM is attempting build up trust with DGs by developing its communication services and providing incentives towards implementation by giving priority access to those actively communicating on priority themes. At the same, it aims to increase awareness among DGs of communication planning and the different tools available by offering a ‘catalogue’ of services to DGs. This is a relatively recent development and can therefore not be assessed with all its implications. It does however hold a potential for greater cooperation, especially from DGs that do not dispose of sufficient own resources (see Table 4 in Section 3.3).

While the ECN has been re-energised through high-level chairing, the evidence from the interviews indicates that it is not the kind of body that can drive and ensure the reform agenda outlined in the Action Plan at the DG level. This is partly because not all the participants are in the position to deliver at home, i.e. convince their hierarchy that there should be an adjustment in communication objectives, activities and resources to fit in with priority themes, avoid contradictions with other DGs or plan future activities. The other dimension is that the political level of the Commission is not sufficiently involved as there is no cabinet participation. The discussions in the ECN involve sharing best practices and keeping each other informed about developments and future plans in DGs. However, according to the responses to our questionnaires, opinion among DG communication units is divided: 42 percent of respondents stated that the ECN was useful and 10 percent indicated it was very useful/important, but equally, 38 percent called for improvement and 10 percent responded that it was off little added value (see Figure 1). Most interviewees said the ECN was generally useful as a stimulator of new ideas and a step in the right direction, but a sizeable majority felt that

meetings were not sufficiently focused and relevant to their own objectives and interests. In contrast the issue-focused ECN working groups were praised (e.g. on framework contracts), but there were also concerns over the proliferation of meetings, which ultimately distract the participants from their core tasks – to communicate externally.

Figure 1. What do you think of the ECN?



Source: Own elaboration based on responses to questionnaires.

The qualitative evidence from the interviews indicates that ‘planning ahead’ as part of the ECN working group works reasonably well within the 1-2 month time-frame. However, there have been frequent hic-ups when short-notice announcement about communication activities are made by DG representatives, mainly because they themselves had not been informed early enough or consulted by other units/actors within their DG. Longer-term planning is very problematic and is not working well, partly because it is not the main focus of the ‘planning ahead’-group of the ECN, while DG COMM struggles to fill the gap for a number of reasons. First, until very recently most DGs have not been able to plan ahead themselves and were subject to sudden and unpredictable demands from within their own house to support certain initiatives (see Chapter 3). Second, the SPP and Cabinets are focused on shorter term media communication and there is no other body at a Commission-wide level with the strategic communication planning capacity that would have the standing to interact with the President and Cabinets. The planning capacities in DG COMM still find it very difficult to provide central planning, since communication is strongly decentralised. The difference between the Commission and the government of a Member State becomes particularly visible when compared to the UK, where two very senior positions of a Director of Communication (under the Prime Minister) and a Permanent Secretary for Government Communication (directly under the Cabinet Secretary and Head of the Civil Service) are engaged in strategic communication planning and synchronisation of the communication of the different policies.

Finally, we identified a technical and procedural problem of how to share information about upcoming events and activities. Even though a calendar planning tool exists, it does not seem to work very well. Initially this tool had been designed to deal with the external stakeholders, not for internal co-ordination purposes. Since it is meant to be

published, it requires a lot of support and editing, which is currently not available. While there is some improvement in the capacity of DGs to plan ahead, questions remain on how to best share this information and ensure that it leads to co-ordinated action.

2.2 Bilateral and multilateral co-operation of DGs

The most institutionalised form of multi-lateral cooperation between DGs takes place within the priority project teams. According to the interviews there are great differences in the degree of activism between the different project teams. One key problem is the issue of ownership as well as capacity and willingness to think on a Commission-wide basis and to invest resources in the management of project teams. The focus is mainly on the co-ordination of activities that have already been agreed at the DG-level without any prior consultation, joint-thinking and planning ahead from the project teams. This means that opportunities for creative joint-action are lost and efficiency gains underexploited. The performance of a priority project team depends crucially on the chair and while DG COMM has the overall responsibility for the implementation of the communication priorities, access to communication tools and expertise, it lacks policy area-specific expertise as well as the sufficient resources to effectively energise and lead a range of thematically diverse project teams. To increase service levels sufficiently DG COMM might be forced to stop all other activities and serve only priorities.

At the same time, the benefits of chairing a task force are not immediately obvious for a DG, particularly when the objective is not at the heart of its own interests and when it requires shifting resources from activities that are considered equally important by the DG. Chairing a project team also brings with it the responsibility (and blame) for the success of the joint activities, although the success may depend on the full co-operation of other DGs which cannot always be assumed. Furthermore, it depends on the respective person having the expertise in public communication (particularly marketing and information campaigns), which is not always sufficient at either the line-DG level nor even within DG COMM itself.

Apart from the agreed annual communication priorities, a set of issues or initiatives is likely to arise in the course of the year that are important in communication terms, because they have considerable public appeal or involve certain risks or sensitivities. While short-term co-ordination with regard to the media takes place within the SPP, the question arises of who is in charge of forward planning of communication activities vis-à-vis stakeholders and the general public. In the interviews and questionnaires line-DGs have complained that DG COMM has at some occasions become heavily involved in the communication of policy/substantive issues, for instance relating to passenger rights, without having the necessary policy-specific expertise to communicate effectively and not consulting sufficiently with them. We were unable to verify how wide-spread this pattern is, but it seems that such issues of political or public importance fall right in the middle of responsibilities between DG COMM and line-DGs.

Beyond the priority objectives or the aforementioned issues with wider institutional appeal most of the co-operation between DGs in communication matters is informal and issue-specific. There are a number of DGs who meet regularly on a bilateral basis to discuss agenda and common-actions, especially where DGs are led by a single Commissioner. We also found more institutionalised forms of co-operation between

cognate DGs, such as the RELEX Information Committee (RIC), which meets regularly and frequently to co-ordinate common actions in the external domain. These forms of multilateral cooperation were generally judged to be very useful by the participating DGs, as they provide a framework for information sharing and reliable co-operation.

Even the more bilateral and informal forms of co-operation have often produced good results, particularly by realising efficiency gains through splitting up tasks and using common facilities (e.g. stands at events). Other forms of co-operation work through using framework contracts of other DGs. The most serious obstacle to the blossoming of such mutually beneficial forms of cooperation seems to be the lack of access to relevant information about the actual communication resources and tools of other DGs (photos databases, mailing lists, etc.) and learning early enough about their projected activities.

From the perspective of effectiveness at the message level, cooperation can and has been impeded in cases when one DG has a stronger interest in promoting an issue than another one. We have heard of cases where one DG wanted another DG to stay on board for a joint campaign, but could not convince it to do so, as the other DG decided to concentrate resources for communication issues closer to its political priority. The withdrawal of support can undermine coherence, cost-efficiency and eventually the impact of communication activities, thus cutting off the lead-DG from resources as well as much needed expertise to address certain target groups (Introduction of the Euro, DG SANCO-DG ECFIN). We were not able to ascertain how wide-spread this problem is.

Even more problematic are cases when DGs are openly contradicting each other with regards to different messages addressed to the same target audience. These differences in message are related to different political interests and policies, which cannot always be fully reconciled. Classical cases are the conflicts between economic and industry interests on the one hand and environmental or health interests on the other hand, each expressed through the respective DGs. It is worth noting that such clashes occur usually when the respective DGs are co-operating only on an ad-hoc basis on the given issue or not at all, i.e. not within more formal contexts such as project teams and semi-permanent DG-groups (RIC). Indications from the interviews are that participation in these teams can have a positive effect on the avoidance of contradictory messages between DGs due to an element of common spirit and at times even peer-pressure. At the same time, not all conflicts between DGs/Commissioners need to be seen exclusively negative, as they can, firstly, generate publicity about important issues and political actors and, secondly, show that legitimate interests of different groups and actors within a society are taken into account and aired within the Commission. We were told of several cases when contradictory messages were avoided by one side suppressing their views or findings, for instance by not publicising research or communications that could negatively impact on producers of certain goods or the global competitiveness of certain European industries (e.g. CO₂ emissions and cars). In those few cases emerging from the interviews, adherence to the values and goals embraced in the Commission Action Plan do not seem to have been the criteria for deciding which DG has to make compromises when policies and messages clash.

2.3 Vertical co-ordination: Commission/DGs vis-à-vis Representations in Member states (REPs)

This section covers some points, which are more extensively elaborated in Chapter 5. However, three main findings are significant with regard to co-ordination and governance and are therefore listed below:

i) Representations are currently managed in administrative and operational terms by DG COMM. This has implications for the degree to which they are being ‘owned’ and can be used by the whole institution, including the line-DGs. From the DG-side there is a considerable and rising interest in using REPs more extensively (‘going local’), but this co-operation is complicated by several factors. The way the operational relationship to DG COMM is currently organised leaves little room for formal and legitimate input from line-DGs into the Representations’ Annual Management Plans (AMPs). As a result, the coordination unit in DG COMM and the Representations are often given little advance warning by DGs concerning planned activities in a Member State and requests for support. Typical examples are information campaigns, which are launched in Member states by DGs with hardly any consultation or advance warning to DG COMM and Representations. In order to allow for more flexibility, REPs have been asked to take requests from DGs into account in their 2008 management plans by reserving some of their resources for this purpose. While this is a step in the right direction, it does certainly not solve the issue of insufficient co-ordination and communication about planned activities between line-DGs and REPs. REPs have little influence on substance or management of these activities, but they are called-upon to intervene with local contractors if things go wrong. There have been also examples of different DGs initiating the same kind of communication activity in a country at the same time. To put it more broadly, there is currently no systematic process of prioritising and integrating DGs’ activities and objectives into the activities of the REPs. This creates frustration on both sides when demands cannot be met and hinders the vertical co-ordination of strategies and activities between REPs, DG COMM headquarters and the respective DG. From the side of the REPs, cooperation with DGs is generally welcomed, at least as far as the necessary resources are available (see point 3). A number of REPs have expressed frustration with an overly administrative character of their relationship to DG COMM Headquarters: They have stated to be monitored extensively regarding their compliance with numerous financial and administrative rules, but would not receive sufficient feed-back from headquarters on their performance and what the ‘substantive’ expectations are, particularly regarding their political intelligence function (see also next paragraph). Some Representations also complain that mission objectives are not sufficiently clear and stable, as they have been expanded in the last year. Recent considerations include giving them some responsibility for supervising the implementation of EU law and infringement procedures.

ii) A key challenge for the effectiveness of European communication is awareness of national concerns and sensitivities early in the decision-making process. Problems cannot always be spotted through the ‘comitology’ process where consultations with national experts and officials take place. Providing an additional channel for identifying public concerns in Member states can help to avoid initiatives being ‘shot down’ immediately in response to adverse reactions of public opinion, particularly by larger Member states. Knowledge about national specificities and interests also offers

important opportunities for targeting audiences with themes and news that are of particular relevance to them. Currently, the system of political intelligence and reporting in both directions is not working as well as it could. Some Representations feel that they lack a system through which they can directly distribute their reports and reach the right people at the right level throughout the Commission, rather than sending messages to generic inboxes or their personal contacts. At the same time, they feel they are not being told clearly and early enough what the information needs of DGs are and what the background to certain decisions is. Heads of Representation (HoR) currently rely heavily on their own personal contacts within the Commission (e.g. SPP, Cabinets) to make sure that their information reaches the right people or they get the information they need. This practice is, however, quite time consuming. They would prefer a more regular system of political reporting, particularly from Cabinets and units of line-DGs. This would equip them with the information needed for initiatives or rapid response without having to ask for it each time. Interviewees from the horizontal services suggested focusing and improving the quality of reporting and its contextualisation at times, which they found to vary widely. Some reports provided them with valuable additional analysis and insights tailored to the Commission's needs, whereas others contained information that can also be obtained from reputable newspapers.

The cooperation with the SPP works well, as REPs have the opportunity to flag-up national or regional sensitivities via video-link at the daily '10 o'clock meeting' of the SPP. Given that the SPP primary focus is the Brussels-based news media, however, there are clear capacity constraints to quickly respond to stories emerging in a national or regional context. It should also be mentioned that when proposals/issues reach the SPP, they are often already in the public domain. There are cases when it can be too late for making modifications to communication or for better explanation of a specific issue to particular audiences.

iii) The foremost obstacle to better vertical cooperation between DGs and REPs are resources (see also Chapter 5). Pilot representations have used their resources in part to intensify cooperation with DGs on priority issues (either Commission-set or national) and DGs are increasingly approaching them for support on various initiatives, e.g. organising events, advise on proposals or monitoring national and regional media. A permanent liaison structure between line-DGs and REPs (e.g. along the lines of departmental mirroring of national Permanent Representations in Brussels) does not exist and there is also no systematic exchange of liaison staff between REPs and DGs. The DG may have an interest as well as some resources to take a particular initiative, but there is no appropriate mechanism that would allow for a transfer of these resources to the REPs for a limited time and purpose (e.g. to implement communication campaigns).

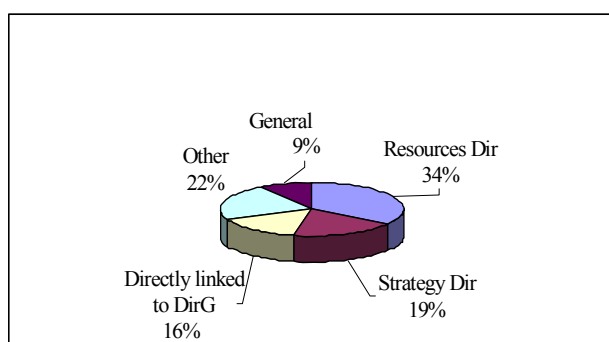
The current situation means that REPs often cannot deliver the kind of service to DGs that they need. The Commission as a whole loses out on opportunities to go beyond Brussels-based communicators and learn more systematically about national and regional preferences in the policy formulation and implementation process. The second major drag on the effectiveness of communication is the nature of administrative and financial rules regarding the running of the REPs, which claims between 50 and 70 percent of staff time in all Representations according to our interviews. This is not unexpected, given that the devolvement of management functions can also increase the

autonomy and responsiveness of Representations. There are, however, doubts whether REPs benefit from all administrative functions delegated to them or whether some are not sufficiently generic to be discharged at central or regional sites. Moreover, HoRs were chosen because of their communication abilities and contacts and they are meant to be the primary face and voice of the Commission in Member states. The HoR is the only one, who is, at least officially, allowed to go on the record. Several Heads of Representation stated that 50 percent of their time is taken up by fulfilling procedural and administrative requirements, which is not the most efficient use of their particular skills, profile and mission.

2.4 Intra-DG co-ordination

Internal structures and processes of communication governance of DGs vary substantially across the Commission. A starting point for our investigation has been the location of Communication Units within the DG organigram. We found that the majority was located within resource directorates (e.g. AGRI, TREN, EMPL, ECFIN, and ENTR), while others were linked to the strategy directorates and a minority was directly attached to the Director-General (see Figure 2). While there is no clear correlation between the location of a communication unit and its influence on the DGs policy, interviewees stated that they would rather be a part of a Directorate which is perceived as strong and with influence on horizontal policy and strategy questions than being in one which has only sectoral duties. Being part of a resource directorate can have advantages in terms of getting support for gaining and administering resources, but also disadvantages in terms of a cultural mismatch between a ‘finance directorate’ and a communication unit. The high proportion of units within the other category can be seen at least in part as an indication of senior management ‘not knowing what do with the communication people’. Finally, being attached to the Director General may come with easier access, but also disconnects a communication unit from the administrative support and information flows that a Directorate can provide.

Figure 2. Location of the communications unit in the organigrams



Source: Own elaboration based on responses to questionnaires.

The most important factor for the extent to which communication concerns have become mainstreamed into the daily life of a DG and its planning of future action is support and interest from the top hierarchy in communication matters (Director General or Commissioner). Some Head of Units feel very well supported within their DG, while a substantial minority indicated in the interviews that they were struggling to make their voice heard. Whether this is due to a genuine lack of interest on the part of superiors or

whether it is also related to the seniority and professional expertise of the respective HoU could not be investigated in this study, as we interviewed mainly HoU themselves. It became clear, however, that a major indicator of influence and support by superiors is whether and how a Head of Communication Unit participates in the weekly management meetings. The majority does, but a sizeable number does not. In some DGs communication is a standard point on the agenda of management meeting, but in others it is not and the HoU is rather ‘listening-in’ than contributing regularly. There are also marked differences in the degree to which the HoU are involved early in the formulation of the DGs Annual Management Plan, the setting of communication priorities and the drafting of a DG communication strategy.

An overwhelming majority of DGs now either already has or is in the process of agreeing for the first time a DG communication strategy. Although the format and substance of such a document varies substantially across DGs, it can be expected to have a positive impact on the consideration of communication concerns early in the policy process of the respective DG as well as facilitating planning at the Commission-level and through the ‘planning ahead’-group of the ECN.

Some DGs have also set up internal networks involving all the staff working on communication across the DG. For instance, in DG EAC so-called ‘Information Correspondents’ (INCOs) in DG EAC have been established in each operational unit, who function as a contact point for the communication unit. This is complemented by one official per directorate who acts as a ‘Communication Coordinator’ and facilitates strategic planning of the DGs communication activities. DG RTD has set up an internal group of communicators to co-ordinate and plan actions better. Both examples seem to us like good practices, which can help to bolster the profile and confidence of communicators within the DG and strengthens the position of the communication unit. This is particularly relevant given that HoU for Communication are often faced with demands from other HoUs and even Directors to publicise certain events and initiatives which are not matching the predefined priorities in the management plan (or the communication strategy, if it exists), and through communication tools that are not tailored to or needed by potential target audiences.

2.5 Co-operation and co-ordination with other EU institutions and member states

With the IGI (Inter-institutional Group on Information) a mechanism for the co-ordination of communication activities among the EU institutions exists. Their co-operation has focused in particular on the information campaigns under the Prince programme. We were not able to conduct a comprehensive investigation of co-ordination mechanism in this area due to time constraints. The available research suggests, however, that this co-operation has been limited, as political interests of the main actors often diverge and given that co-funding of initiatives has been very difficult to handle both administratively and financially. We note that progress has been made towards creating a new basis for inter-institutional co-operation – a draft agreement between the main institutions has been presented in early October. We were not able to assess the potential of this draft agreement to maximise synergies between the institutions on the communication issues of concern to everyone. The ideal outcome would clearly be a

joining of forces and resources with regard to those issues that are considered of high importance for the EU as a whole.

Given the potential gains to be reaped from co-operation with a resourceful and authoritative player, governments of Member states, individual ministries and even regional governments and authorities are attractive partners for co-operation. This is why the Commission as a whole has sought to form management partnerships with interested Member states, which are already in place in a few countries and foreseen in others (Germany, France, Slovenia, Hungary, Portugal, and Italy). The aim is to develop a legal, financial and management structure from which joint communication initiatives can be launched: A joint action plan is agreed and an intermediary body, possibly a governmental one, is appointed to manage the EU funds. These partnerships certainly depend on the willingness of Member states to participate, which varies. However, according to DG COMM there is a strong demand from a number of Member states. While it is too early to assess how well these partnerships will work in practice, it does address some of the administrative and political shortcomings that have obstructed co-operation between the EU and Member states in the past. Co-financing and budgeting were often impeded by problems on the Commission-side with regard to delays in the dispersal of funds. In this respect the management partnerships with Member states hold a substantial potential and seem to be in growing demand from national authority. The issue is therefore rather whether the Commission can currently offer the Member states sufficient financial incentives to cooperate on European political communication.

It is currently not clear how individual DGs can benefit from the existence of such partnerships. If partnerships succeed in creating thematic communication in Member states, however, they could motivate line-DGs to become more closely associated to actions linked to their particular objectives. Currently, there have been relatively few systematic attempts by DGs to involve the different levels of national governments in communication activities. This is partly due to legal and financial obstacles involved in building up relationships and partly because of DGs' small budgets available to fund activities jointly. A particularly fruitful avenue for co-operation has been opened by the involvement of Member states' representatives in DG activities through a Board of Governors as in the case of the Joint Research Centre. These representatives have been very useful to communication activities, as they assisted with mailing lists and establishing important contacts.

Moreover, when line-DGs have a shared and stable interest in promoting certain policies with their national counterparts there are often opportunities for establishing more durable relationships and networks. In the case of DG ENV, this came in the form of the 'Green Spiders Network', which comprises communication experts from EU Member states' environmental ministries. Together they have co-ordinated the implementation of the climate change campaign in various national settings. DG REGIO also works with a network of communication officials within regional authorities. According to the interviewees, the key challenge in the relationship is to create a sense of common-ownership and joint-financing and try to avoid the impression of anyone free-riding on the resources of the other.

In some policy-fields member states do not only have a political, but also a legal responsibility to communicate common policies and projects (e.g. agriculture and regional policy under the so-called 'shared management' rules). While the respective

DGs are generally reluctant to confront Member states when they do not live up to their legal obligations embodied in communication plans, there have also been cases when Member states were forced to reimburse money. This has been the case in Greece, where EU funds of about €500 million had to be paid pay back for failing to inform the public through signs that the new Athens Airport was partly financed by the European Union.

In some Member states cooperation on communication matters with national authorities is particularly difficult. In the case of the UK, for example, the Commission has hitherto been told that for political reasons there would be no formal co-operation on communication activities with the government. In these cases, co-operation often occurs with regional authorities, which are usually much more open.

The relationship between the Commission and the EP has not been without tensions, as both institutions and the individuals within them can have different agendas and interests. In Member states the quality of cooperation between REPs and EP Information Offices varies. Almost all Representations share their premises with the EP Information Offices in the so-called ‘Houses of Europe’ and management partnerships have been developed. This does allow for efficiency gains in terms of resources and offers opportunities for carrying out events jointly, which increases the attractiveness of the common space for the public.

At the same time, there are differences in the degree of cooperation across Member states. In some places there have been initiatives to go beyond ad-hoc co-operation on specific issues/events or opportunity-driven information sharing: Some REPs agreed on joint activity plans with their counterparts from EP Information Offices (for instance in Paris) and the pilot project ‘European Public Spaces’ aims to combine resources and avoid duplication between the two, including having a joint action plan.

Despite the development of management partnerships, there are still formidable legal and administrative obstacles to using financial and material resources jointly. From the perspective of a democratic division of labour, a degree of conflict (e.g. on policy proposals) between the EP and the Commission should be seen as healthy and common communication on these issues would be difficult, if not counter-productive for a European debate. However, there are basic issues about the functioning of institutions or citizens’ rights in the single market where both institutions could easily join forces. As democratically elected representatives, MEPs can speak with a different authority to the national media than even a high-ranking Commission official. MEPs can personalise conflicts and provide the EU with a human face at the national level.

3. External Communication of Directorates-General

3.1 Setting Objectives/Priorities & Identifying Target Audiences

The key questions that this section addresses are drawn from the terms of references:

- What are the communication priorities/objectives of the DGs? What are the relevant target groups for each of these priorities/objectives?
- How do these priorities/objectives and target groups of the DGs link with the overall communication priorities/objectives decided by the College?
- Given that the study is also interested in an assessment of efficiency, effectiveness and relevance, we are also investigating the answers to the following questions as indicators of good practices in the communication of public bodies.
- Do DGs clearly and appropriately define what the target group is for different objectives and priorities?
- Are the objectives themselves specific, measurable and realistic?
- Do the objectives distinguish between different kinds of effects such as knowledge raising, influencing attitudes/relationships or changing behaviour?

What are the objectives and priorities of DGs?

In our questionnaire we have asked DGs to list their communication objectives in order of importance (see Annex 5, Question 1), thus providing not only an indication about the purposes of their communication activities, but also of the degree of prioritisation. DGs also pointed to annual or multi-annual communication strategies as sources of objectives and priorities. Although we asked for a ranked order, the communication plans (in so far as they exist) as well as the interviews indicate that there is generally no clear prioritisation between these objectives. In some cases, DGs provided us with four or more objectives rather than the requested three.

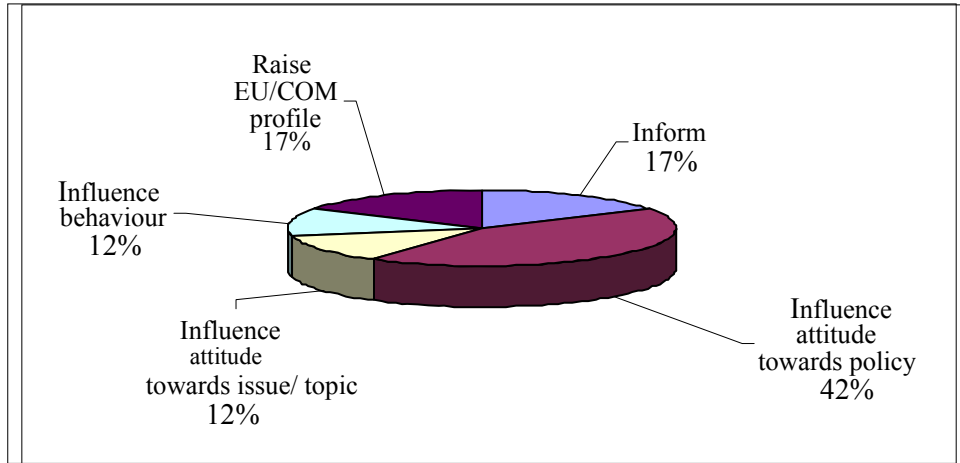
What complicated the analysis of the communication objectives further was the fact that responses did not always clearly specify what effects and impact the given DG wanted to achieve. A clear statement of objective would be ‘to raise public awareness of humanitarian issues’ (ECHO), ‘to increase media, public and political support for the Commission’s internal market policies’ (DG MARKT) or ‘to enhance JRC’s reputation for scientific excellence’. However, about 40 percent of the communication objectives mentioned were actually not objectives, but rather phrased as a range of activities, which may have different kinds of effects such as ‘informing’, ‘promoting’, ‘explaining’, or ‘publicising’. Quite a number of DGs aimed to ‘communicate’ specific initiatives such as setting up of the European Institute of Technology (DG EAC), ‘improve the political communication of EU enlargement policy’ (DG ELARG), ‘provide first-class information on possibilities under the 7th Framework Programme’ (DG RTD) or ‘publicising our new work for information and transparency purposes’ (DG SANCO). In other words, a large proportion of the communication objectives is about communication *output*, but *not effects as such* (see methodological annex). At the same time, some of the individual objectives contain aspirations for different kinds of effects such as raising knowledge and information as well as support for specific

policies and issues. These are then sometimes specified more clearly in the strategies and annual communication plans, but as a starting point for the analysis of the objectives they still leave substantial ambiguities about what individual DGs actually want to accomplish.

The question is whether this lack of clarity at the level of objectives is tactical in nature or rather a reflection of insufficient strategic planning and targeting of communication. Based on the interviews we have come to the conclusion that it can indeed be both. While a minority of DGs speak quite openly in their objectives about creating support for policies and positive attitudes among citizens and stakeholders regarding the EU, others choose a more cautious language and speak of ‘positive visibility’ (DG DEV) or of ‘demonstrating’ or ‘showing the benefits of’ certain policies, rather than stating what is really intended, namely to influence attitudes such as trust and support regarding issues, policies and the EU (see also the annex on methodology for the difference between different kinds of effects). The aspiration to sustain or increase support for a particular policy regime is in some cases even enshrined in regulations as in the cases of DG AGRI and DG REGIO. In contrast, other DGs emphasise more strongly a bottom-up dimension with regard to the formulation and communication of policies. For example DG RELEX aims to engage in ‘a more open dialogue with citizens and to better respond to their expectations’.

Given the stated ambiguities and overlaps, it is instructive to consider DGs’ responses to a separate question (Question 18, see Annex 2), which we used to categorise different kinds of intended effects, as shown in the Figure 3 below. It reveals, firstly, that most DGs listed a number of specific effects they desired to achieve vis-à-vis their target audience when prompted in the questionnaire, although these are not always embodied in the official communication objectives (see paragraph above). Secondly, in substantive terms the analysis reveals, perhaps unsurprisingly, that DGs see communication policy primarily in terms of generating support for their particular policies – even if the language chosen to express this aim varies a lot between DGs. If one combines the figures for raising awareness and knowledge with the figures concerning the profile of the EU, the next big category is about increasing awareness and knowledge about issues, policies and the EU more broadly. Coming in third place, a certain number of DGs aims to inform and change attitudes not about certain policies and actors, but about issues in a wider sense: for instance, climate change and energy saving strategies, ageing, healthy living and eating, or certain values and cultures (e.g. ‘European Knowledge Society’, the European model of agriculture). About a quarter of DGs therefore has certain issues at the heart of their communication agenda and about 12% set out to influence behaviour.

Figure 3. Intended effects vis-à-vis various target audiences

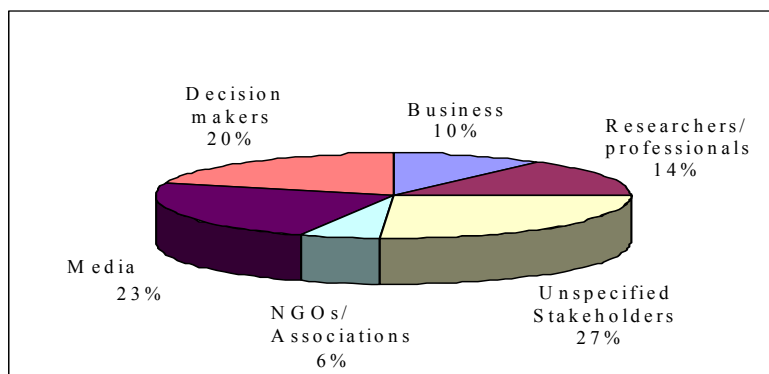


Source: Own elaboration based on responses to questionnaire (Question 18).

What are the target audiences?

The analysis of the questionnaire responses revealed a quite differentiated picture about the target audiences for communication. While the general public is overall the most favourite target group, other groups such as decision-makers, the media and other unspecified stakeholders come as close second. This distribution underlines the orientation of most DGs to the objective of sustaining or generating support for policies and initiatives, both current and future ones. However, it also stresses how strongly DGs differ concerning their communication objectives and as a consequence also the types of stakeholders with whom they regularly interact and on whom they depend for achieving their overall objectives.

Figure 4. Target audiences (except general public)

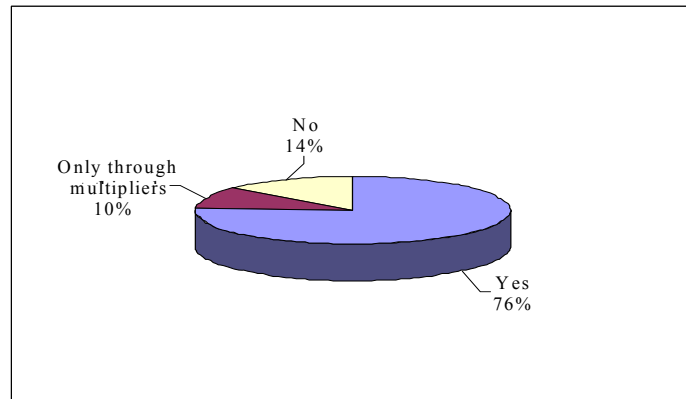


Source: Own elaboration on the basis of responses to questionnaires.

We also asked a separate question (question 19) to find out whether DGs also aim to reach the general public. The somewhat surprising finding was that 86% of all DGs saw the general public as a target audience, i.e. one that needed to be approached directly as

well as through multipliers (e.g. the news media and information relays). From the answers to question 17, we could tell that almost 68% of DGs (i.e. 19 out of 28 DGs surveyed) even see the general public as one of their *primary* target audiences. Given the available resources this is clearly an ambitious objective.

Figure 5. Do you address the general public?



Source: Own elaboration on the basis of responses to questionnaires.

How do they link to overall communication objectives/priorities of the Commission?

To answer this question one needs to clarify first what the overall communication objectives and priorities of the Commission as a whole are. As already elaborated in more detail in Chapter 2, 19 communication objectives for 2007 are contained in the Commission's work programme under the broad thematic headings of prosperity, solidarity, security and freedom, Europe in the World, and Future of Europe.

For 2008, this list has been narrowed to seven priorities in the Annual Policy Strategy: The Budget Review, The Single Market Review, the Social Reality Stock Taking, Migration, The Institutional Settlement, Energy and Climate Change, The EU's Role in the World. These thematic communication priorities are, however, not further defined in the context of a strategic document or a Commission-wide communication plan, with the result that there is no horizontal definition of specific communication objectives and intended effects and no clear indication of what the overall direction and content of communication activities should be. This is left to the priority project teams when they draft their mandates. For 2007, the existence of 19 priorities under thematic headings has led to some confusion among DGs, as one can see from the responses to question 2 in the questionnaire (see Figure 6). Moreover, there has been a shift in specificity from 2007 to 2008. While the number of priorities were reduced (which should be welcomed), the level of generality *increased*. While Europe in the World was 'just' a thematic heading for specific priorities in 2007, it is for 2008 an extremely broad priority in itself. This will undoubtedly make it difficult to operationalise and to prioritise resource allocations accordingly.

On top of these annual communication priorities there are also some broader and more long-term communication objectives spelt out in the Action Plan and the White Paper. These include the Commission's contribution to building a 'European Public Sphere' as

a space where cross-national opinion-formation about issues of collective concern can take place.¹² At the more intermediate level and embodied in the Action Plan are three strategic principles underpinning a ‘new approach’ to ‘earn people’s interest and trust’.¹³

Listening in order to understand citizens concerns and preferences and use it for policy formulation and output.

Communication in order to inform about and gather support for policies and political developments

Connecting with citizens by ‘going local’: It involves a mixture of better listening to diverse demographic, national and local concerns and ‘to convey information through the channels citizens prefer in the language they understand’.

In the responses to the questionnaire and in the interviews, DG usually referred to the annual communication priorities rather than to the three broader strategic objectives, with the marked exception of ‘going local’. We got the impression, however, that there are divergent understandings among DGs of what ‘going local’ actually means for their own communication activities. One interpretation is that the general public, i.e. 500 million citizens across the EU-27, need to be given an opportunity to express their concerns and preferences vis-à-vis EU actors and be reached through the communication channels they use on a daily basis in their native language. This is clearly a massive challenge for DGs, which raises questions about the adequacy of resources to achieve it, particularly if systematic listening and responding is the aspiration.

In order to decide whether or not DGs communication objectives were in sync with, related to, or derived from the 2007 annual communication priorities, we looked at the responses to the relevant question (i.e. question 2), but did not take them on board uncritically. For instance, some DGs said their communication policy related to the ‘priority’ of growth and jobs or ‘solidarity’, which are defined as thematic headings and would be, in any case, far too broad to be a useful priority itself. Moreover, there were responses that claimed that their objective were ‘fully in line with the communication priorities identified by the College’ without specifying any specific priority. When comparing the objectives with the actual priorities there was at best a tentative link, so we would count this DG as ‘No’. Problematic were also cases when DGs indicated that they used the context of the 50-year anniversary of the Treaties of Rome to sell their particular policies. The priority thus became just a vehicle for a slightly different purpose.

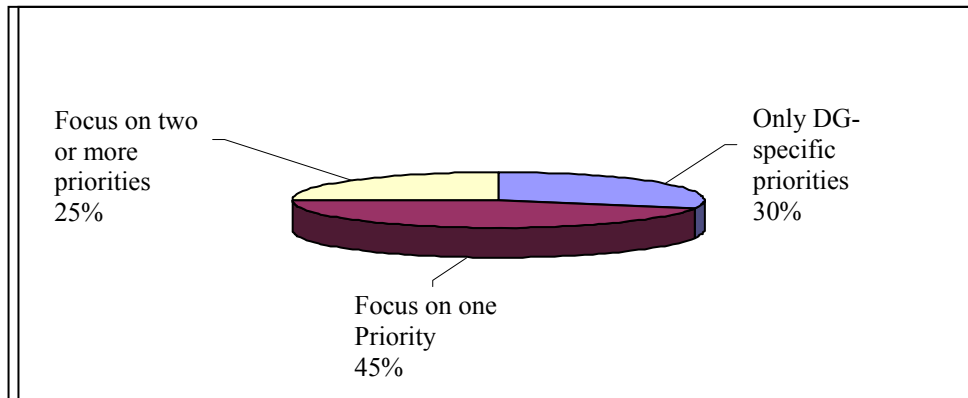
Despite these methodological difficulties in interpreting the responses, the following figure shows quite reliably the percentage of DGs (only counting policy-DGs, not support or central ones) that were covering one or more of the 2007 communication priorities. Given that there were 19 priorities, albeit quite specific ones, it is not

¹² White Paper on a European Communication Policy, COMM (2006) 35 final, p. 4, at: http://ec.europa.eu/communication_white_paper/doc/white_paper_en.pdf.

¹³ Action Plan to Improve Communicating Europe by the Commission, p. 3, at: http://ec.europa.eu/DGs/communication/pdf/communication_com_en.pdf.

surprising that 70% of DGs were engaged in the communication of at least one such priority. The potential use of priorities to allocate funding or to grant priority access to certain tools is obviously problematic under such conditions. There were some DGs such as INFSO, TREN, and EAC and of course COMM, which explicitly focused on two or more of the stated priorities.

Figure 6. Percentage of DGs Covering 2007 Communication Priorities



Source: Own elaboration on the basis of responses to questionnaires.

At the same time, there was a small number of DGs whose portfolio clearly related to a number of priorities (e.g. ‘Flexicurity’, ‘Equal Opportunities’ or the ‘Social Reality Stock-taking’ in the case of DG EMPL), but which made no reference to them in their specific objectives or indeed in their response to question 2 of the questionnaire. If we look at the responses on priorities in general, we find that some priorities were oversubscribed, while others were not covered within the top-three communication activities by any of the DGs. This does not mean that there was no actual engagement in the communication of this area them, but it does mean that the priorities of the individual DGs and of the Commission’s as a whole are not in sync. One should note in this context, however, that we did not receive responses to our questionnaire from DG JLS and DG AGRI.

The process of defining communication priorities for the Commission as a whole and matching them to the ones of the DGs has been hampered by a lack of bottom-up involvement of DGs. As the table illustrates some priorities are not supported by a critical mass of DGs. However, the fact that some topics in the list are not recognised by any or just by one DG as a priority must not necessarily be a problem, as long as other DGs are prepared to engage in the ‘priority project teams’ on the topic, which is then led by the respective line-DG with the greatest interest in the given priority. On the other hand, a number of DGs have the aspiration to focus on more than one of the priorities, some even two or three. This raises questions about whether the respective DGs are able to prioritise their resources, whether they get sufficient and extra support on the priorities from Communication support DGs or indeed the Commission as a whole, and whether the ‘carrying ability’ of DGs has been taken into account when the priorities for 2007 were set. Given that the number of priorities has been reduced for

2008, the line-up and distribution of DGs across priorities is likely to be very different for the coming year. Generally, the results for this section highlight problems of co-ordination, leadership and ownership. They are however not entirely surprising given that the year 2007 has been the first ever for Commission-wide communication priorities to be set by the College and given that many DGs are just now in the process of drafting their first ever communication plans and multi-annual strategies.

Table 1. Coverage of annual communication priorities by one or more DGs

Commission Communication Priorities	DGs Priority Focus
1. Education: 20 years of the Erasmus Programme	EAC
2. Research and Innovation, including EIT and ERC	RTD, JRC, EAC
3. Single Market review	MARKT
4. Energy Review for Europe	COMM, ENV, TREN
5. 'Flexicurity'	-
6. Immigration	JLS*
7. Better regulation and simplification	ENV, TREN
8. Social reality stocktaking	-
9. Cohesion and rural development (2007-2013)	AGRI*
10. Environmental protection	ENV, FISH, AGRI*
11. 'European Year of Equal Opportunities'	-
12. Preparations 'European Year of Intercultural Dialogue'	EAC
13. Fight against organised crime and terrorism	JLS*
14. Border control	JLS*
15. Enlargement	ELARG
16. Neighbourhood policy	RELEX
17. Market access strategy	DEV
18. Plan D and the constitutional debate	COMM, SG
19. 50 th Anniversary of the Treaties of Rome	COMM, EMPL, AIDCO

*DG did not reply to questionnaire, but answer can be realistically assumed.

3.2 Choosing and Using Communication Instruments

This section aims to provide a survey of the most relevant communication instruments that DGs employ for their defined objectives and for the different audiences. It assesses the relative importance of these instruments from different perspectives and analyses whether DGs are using the right tools for their envisaged target audiences and from the perspective of the effects they want to achieve.¹⁴ These three questions also constitute the structure of this section.

¹⁴ See also the terms of reference for this study.

The section does not cover in detail the Representations as an instrument, as they are dealt with in more detail in Chapter 5. Similarly, web applications and translation services are covered in Chapter 4.

3.2.1 Overview of Communication Instruments Employed

Our survey of the DGs communication activities painted a picture of substantial diversity with regard to the communication instruments employed. This is not surprising given the range of different objectives that DGs pursue in particular with regard to their particular policy agenda. Particularly DGs with a small budget were often quite imaginative regarding their choice of activities and instruments. As stated in the introduction, a detailed description and assessment of each and every activity and tool is beyond the scope and purpose of this study. In the following we want to provide an overview of the activities and instruments from different perspectives. Our findings are based on the responses to the questionnaires we sent out to DGs, the data we received from the screening exercise of DG BUDG and additional sources that may help to better assess the performance of tools in a comparative perspective. The issue will also be looked at from the angle of an efficient use of resources in the respective section 3.3 of this chapter.

In our analysis we cannot entirely separate activities from instruments. This is particularly relevant in the context of multi-channel and integrated communication, i.e. the combination of a range of instruments such as advertising, events, and competitions, publication for a specific purpose and for a defined audience. For instance, the question arises whether a ‘Green Week’ is an information campaign, a combination of different instruments, or a single event. Given these complications, we will stay for the following two comparative sections largely within the broader categories of instruments in terms of channels of communication, i.e. methods to reach and engage different kinds of audiences.

The most frequently used tool across all DGs were publications in all shapes and forms: Official documents, brochures, leaflets, reports, studies and books aimed at either the general public or specialist stakeholders in a variety of languages. We note, however, a trend towards scaling back the number of titles and a reconsideration of the cost-effectiveness of this instrument for more specialist audiences (see section below).

All of the DGs also used their own or a jointly-hosted website as the most cost-effective way of communicating to various audiences (see Table 3) and for different purposes: to offer statistical and textual information, official documents or video clips for downloading, for streaming of events, interactive games, answers to citizens’ questions or to gather feedback.

Events were the second most popular instrument employed, which covered a broad range of activities, e.g. a single stand at a major fair for stakeholders, a research conference or a launch-conference for a new policy initiative. Substantially broadening the definition of events, we also found that ‘Europe Days’ or issue-specific ‘Days’ or ‘Weeks’ were very popular as a framework for varying kinds of activities and as a stimulus to involve other public and private organisations or ordinary citizens.

Most DGs also worked to a varying degree on relations to the news media, partly for dissemination of information, but partly also as multipliers for more far-reaching

objectives such as awareness raising on specific issues or policies, or indeed to change public attitudes regarding the EU, the Commission or particular issues.

Beyond these three instruments, the picture becomes more varied. DGs with a larger budget and the objective to reach the general public also engaged in information campaigns, including external contractors and buying of advertising space. This is particularly the case for DGs engaged in the Prince-programme. Some DGs employed the buying of air-time, ad-space or ‘advertorials’ in a more selected and targeted fashion in support of key issues.

We also noted a trend among a number of DGs to move more strongly into the area of audiovisual communication, either by commissioning the production of video news releases (VNRs) or video clips for free use by broadcasters, EbS, or EU-Tube or by paying for documentaries, trailers or news report to be taken up by Euronews or other broadcasters.

The least frequently used tools were generally either those that required a large budget, such as producing broadcasting material for varying national and regional markets and buying air-time on TV channels, radio or in cinemas.

Similarly, instruments that require an in-depth targeted approach to particular groups and audiences are not used very often as well as those that are seen as potentially problematic from the perspective of eroding the boundaries to commercial promotion technique. This includes direct mail and email, door drops, face-to-face marketing (including field marketing and experiential activity), third party and press inserts, outbound telemarketing, and SMS/MMS messaging.

We found a degree of clustering in the use of instruments across DG families:

Shared management DGs with a large budget were able to pick from a broader toolbox, focusing in particular on publications for both citizens and stakeholders, information campaigns backed by audiovisual materials and large stakeholder events. DGs with a small budget tended to work more with the news media as multipliers and used smaller third-party-organised events and the web.

DGs that have a non-materialistic ‘good’ cause to sell and that may aim to promote healthy and sustainable lifestyles, such as SANCO, ENV and TREN, have used framework events such as the ‘Green Week’ or the ‘Mobility Week’ to raise awareness about issues and promote behavioural change. They were also much more likely to attract third-party interests (Chefs, Weather forecasters) and co-sponsorship, co-operating with creative professionals and tapping into mass events such as football games. The RELEX family relied a lot on audiovisual material and the internet to show through pictures how the EU is making a difference in diverse parts of the world. DG RELEX also used specialised seminars for journalists as an important tool. They are organised by the European Journalism Centre based on a framework contract from DG COMM.

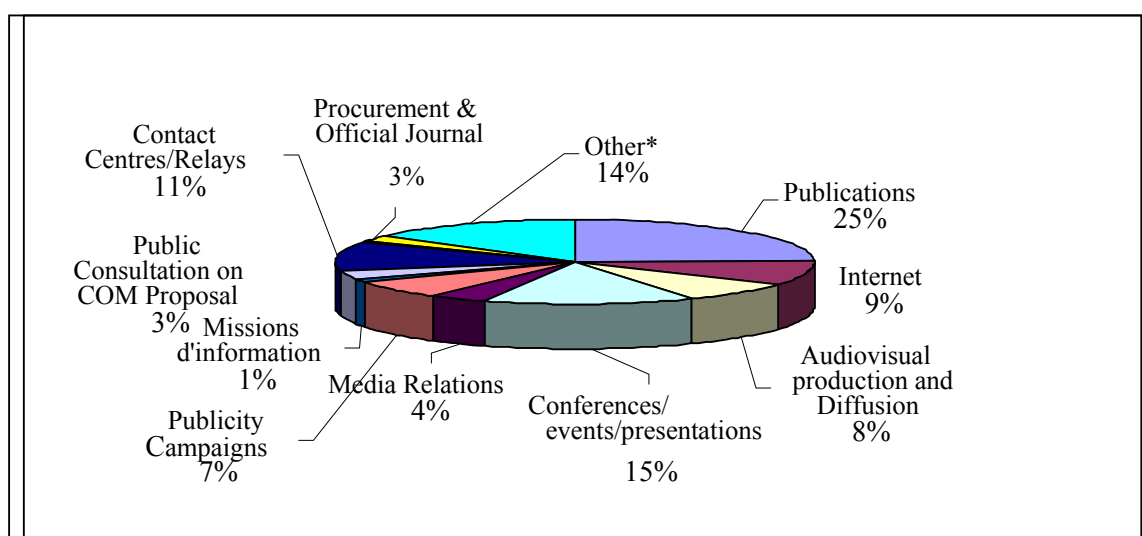
Central DGs such as BUDG and ADMIN were either targeting the news media on very particular issues relevant to their portfolio or focus on disseminating essential information through printed publications or online databases to specialist audiences.

Finally, DG MARKT and ECFIN concentrated more on media relations, the targeting of particular specialist stakeholders through conferences, workshops and publishing research and survey findings to support policy approaches.

3.2.2 What is the relative importance of each of the tool used?

We have already noted that different DGs or DG families tend to prefer different kinds of instruments for communication purposes. Figure 7 shows the breakdown of communication expenditure for an average DG.

Figure 7. Breakdown of an average DG's communication expenditure

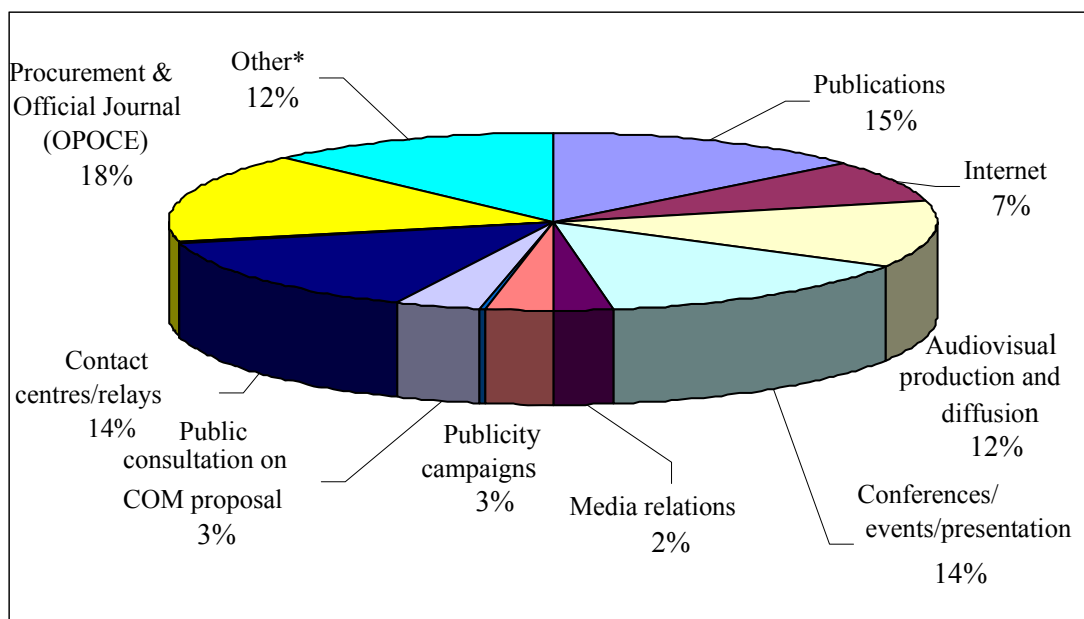


* For example, 'European Years'.

Source: Own elaboration based on DG BUDG screening concerning 2006.

Figure 8 shows the share of total budget spent on communication by instrument in 2006. Resources are relatively evenly distributed among four main instruments: publications (15%), conferences/events (14%), contact centres/relays (14%) and the audiovisual sector (12%). The picture shows a stronger dominance of publications however if the 18% resulting from publications of OPOCE (including the official journal) are added to the 15% already mentioned for the individual DGs.

Figure 8. Share of total budget spent on communication in 2006



* For example, 'European Years'.

Source: Own calculations made on basis of DG BUDG screening.

However, this quantitative ranking of communication instrument is not borne out by the subjective assessment of DGs of which activities they found most costly and most time-consuming. As can be taken from Table 2 below, events, specific campaigns and publications are seen as the most costly instruments (in this order). Similarly, events, specific campaigns and the web are ranked as the most time-consuming activities.

Table 2. DGs evaluation of instruments across two indicators: Time and Money

	Most costly		Most time-consuming	
	Number of DGs	in %	Number of DGs	in %
Events	15	65	11	52
Specific campaigns	10	43	10	48
Publications	11	48	5	24
Media	4	17	7	33
Audiovisual	6	26	4	19
Relays	4	17	2	10
Web	9	39	9	43

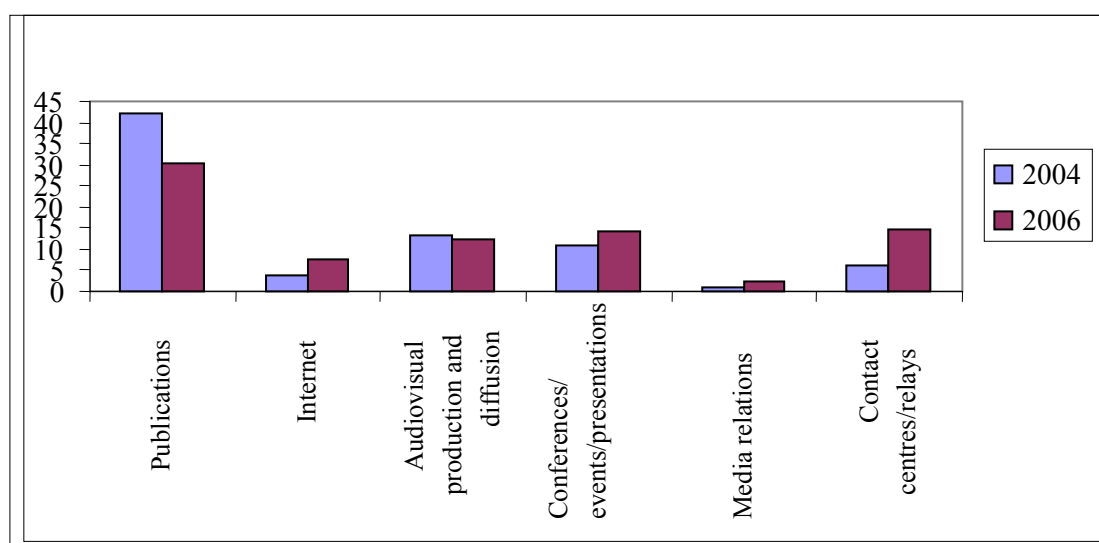
Source: Responses to questionnaire.

The discrepancy can in part be accounted for by the fact that this analysis takes the assessment of DGs as the unit of analyses, not the *overall* volume of expenditure. This can strongly distort the picture given the wide differences in the communication budget available to some DGs. It may also reflect a subjective element of Heads of Unit in the sense that some instruments cost quite a lot per single unit (e.g. a campaign run by an external contractor), require a lot of involvement by the HoU herself/himself and are also quite deadline-driven (e.g. large events). The second explanation is that there has

been a marked change in how DGs allocate resources to different tools over the last years.

A comparison of budget shares of the different instruments over time (2004 compared to 2006) indicates two main trends: First, the share of publications was substantially lower in 2006 than in 2004. It was still the most resource intensive instrument, but significantly less so than in 2004. In contrast, in 2006 a greater percentage of the DGs' resources seem to have been spent on conferences and events which is more in line with the responses from DGs in Table 2 and the qualitative data we obtained. One can also see an increase in expenditure for internet communication. We think that both increases are significant and should be seen to a large extent as genuine changes over time

Figure 9. Budget share by category, comparison, 2004-2006



Note: The category 'Publications' here includes procurement from OPOCE and the Official Journal.

Source: Own elaboration based on *Draft Report: A qualitative and quantitative assessment of Communication in the European Commission* (2005) concerning 2004 data and DG BUDG screening concerning 2006.

3.2.3 Using the Right Instruments for the Right Purpose?

How is it possible to evaluate with a sufficient degree of reliability whether the DGs are using the right tools for their envisaged target audiences and from the perspective of the effects they want to achieve? One answer to the question would be that whether an instrument is appropriate depends on a range of considerations that are all interlinked: Are the objectives realistic and specific enough? Have priorities been set in a way that resources can be allocated appropriately? Are instruments chosen by qualified personnel from a broad toolbox and with full awareness of their relative strengths and weaknesses. In particular, is an instrument able to reach and engage a target audience given the characteristics and needs of this particular audience? Is it possible to achieve the desired effects with the chosen instrument? Abstract judgements about the appropriateness of a particular instrument are problematic, as they are necessarily case-specific and best approached to targeted and timely evaluations. This means that no tool is *per se* more or less effective. These considerations means also that the effective and efficient use of

communication instruments is negatively affected by the lack of clear identification of objectives and target groups as outlined in the previous section. Moreover, there are indications that the choice of instruments relies more on issues such as time and resources invested or political risk than in the actual effectiveness of the tools. The result is that managers often prefer to carry out, or report on, activities which are easily measured in terms of outputs instead of others where impacts are more uncertain. However, effectiveness should be measured in terms of outcomes/impact and not of output. Some instruments (such as press releases) are often measured in terms of output, but their overuse may actually have counter-productive effects on the credibility of the Commission as a communicator with journalists.

Despite these important caveats, this study aims to bring out more general lessons about the use of tools in the Commission. For purely heuristic purposes we will therefore present an approximate and aggregate assessment that we have made on the basis of two benchmarks. First, the assessment of Heads of Unit themselves about what went well and what did not go well, which we assume to be at least in part influenced by results of the evaluations undertaken (see section 3.4). The results are reflected in Table 3.

Secondly, we are comparing the use of instruments with good practices about the choice and use of communication tools as outlined above and in the annex on methodology in order to make an assessment of whether the DGs tend to use certain types of instruments in the appropriate fashion. Here we also draw on the interviews and the questionnaire responses from the DGs to present a set of good and not-so-good practices that we observed in the course of our study. This section is concluded by some general remarks.

Table 3. Perceptions of the effectiveness and efficiency of instruments

	Average	Most successful		Most efficient	
		Number of DGs	in %	Number of DGs	in %
Events	45	9	45	8	44
Specific campaigns	26	8	40	2	11
Publications	46	14	70	4	22
Media	46	5	25	12	66
Audiovisual	2.5	0	0	5	27
Relays	2.5	1	5	0	0
Web	75	11	55	17	94

Source: Own elaboration on the basis of responses to questionnaires.

The responses to the questionnaires present a birds-eye, aggregate perspective on the perceived effectiveness ('success') and efficiency of seven kinds of tools. What is most interesting is that there are notable differences in the rankings across these two indicators. DGs judged publications, the web, events and specific campaigns to be in relative terms the most successful instruments from the perspective of achieving the desired effects. The most efficient were the web by a large margin, media work, followed by specific events. We submit that these differences are in part due to two main considerations. Instruments such as publications and the web are seen as successful because output or outgrowth can be relatively easily measured (hits on the homepage, number of publications distributed/requested). The problem with assessing the work of media relations in contrast is in part the result of problems that most DGs

have with monitoring media effectively and establishing cause-effect relationships. The desired effects – shift in attitude or growing support for a particular policy – are also hard to attribute to media coverage.

If we want to arrive at an overall ranking of tools from the perspective of DGs, there is one clear favourite: the web with an average of 75 % across both dimensions of perceived performance. One particular attraction is its versatility as one can use it as a platform for a range of other media such as publications or video clips. It can be reactive or interactive. It can be used to learn a lot about the ‘audience’ that uses it, it is fast and not limited by bandwidth and distribution problems like other media. Most importantly, its reach depends on demand and is potentially limitless. Given the popularity of this tool within the Commission, the problems with realising synergies across Commission websites are particularly regrettable (see Chapter 4).

Events, publications and media work are also versatile tools at a similar level of overall attractiveness to DGs. They can be used to target both specialists and ordinary citizens. In contrast, specific campaigns are often considered a ‘hit-and-miss’ instrument. They can work very well when all the background conditions are fulfilled, in particular, good PR personnel working on it, but they are very time-consuming, expensive and politically risky. Finally audiovisual instruments come surprisingly low down the pecking order, which may have to do with the fact that they are not yet well-understood in their impact and their conditions of usage. In the interviews some DGs were quite enthusiastic about the new opportunities, but it is also clear that they appeal currently only to a certain type of DG, namely those with ‘good cause to sell’. The least popular and quite time-consuming instruments of communication are some of the relays. They are quite heavy to administer and the concrete benefits and impact are sometimes difficult to assess.

Drawing on the rich body of data that was provided to us in both the interviews and in written form, we want to very selectively highlight a number of good and not-so-good practices with regard to the choice of instruments. This is by no means to be comprehensive and we have decided not to name any DG under the second heading, which is, however, no less important than the first one.

Good Practices

- The first good practice is the ability of DGs to be self-critical and learn from instruments and activities that have worked well. DG EMPL noted for instance that they were reviewing their publications policy in order to reduce the number of publication titles and were considering moving from print to online publications for specialist audiences. They had already reduced the number of titles by 30 percent from 2005 to 2006.
- Instead of matching one instrument to one objective, we found good evidence of integrated communication exercises, i.e. harnessing different communication tools to reach a given objective. For instance, ECHO used a number of different instruments for the Humanitarian Village campaign in Poland, including advertising, the translation of a related computer game into Polish, the organisation of activities and ‘free’ publicity in the form of TV, radio and press interviews in Poland and an article in the LOT in-flight magazine.

- Many DGs realised that they could much more effectively use the media as multipliers, if they were able to use a ‘news hooks’ to anchor activities, .e.g. 1 of May anniversary of 2004 enlargement (ELARG), 50 Anniversary of Treaty of Rome, UN International Development Days (DEV), G8 Summits, climate change campaign (ENV) or attempt highlight impact of EU for reconstruction in context of fires in Greece.
- Communication efforts aimed at the general public are more effective when they are driven by a pull- rather than push logic. It is much easier to engage ordinary citizens if there is a direct and measurable consumer benefit to EU policies (passenger rights and roaming, INFSO) or particular national cultural dimension (metric system in the UK can stay, REP UK).
- Audiovisual materials such as documentaries and VNRs can have a huge impact if they are well-made and carefully targeted, e.g. a documentary featuring EC humanitarian aid system and response to Kashmir earthquake (ECHO), or a VNR series on employment, reaching 3.6 million viewers, broadcast by 16 different TV stations (EMPL).
- A particularly effective form of communication is tapping into the visibility and appeal of sporting organisations and other entertainment industries with mass appeal. This is usually only possible when reaching out on particular causes that are shared with these groups and that are seen as non-party or national political, e.g. UEFA sponsoring for physical fitness (DG Sanco), ManU against Europe (50 years celebrations) (UK REP), School project in Germany with high level political participation (Chancellor Merkel).
- A variation of this theme are contact developed to networks of professionals with a high visibility or outreach, such as Chefs in restaurants (healthy eating, DG SANCO), or TV weather presenters through the Climate Broadcaster Network (DG ENV climate change), or co-operations with the filmmaker Yann Arthus Bertrand on his new movie on environment (ENV). Ordinary citizens can be engaged through structured events, e.g. Green Week, EU Sustainable Energy Week, European Mobility Week (incl. Car Free Day), European Job Days, etc.
- We also found evidence of using the website to use both European and non-European audiences through means of close collaboration within the RELEX DG family. They developed the ‘Global Europe’ brand and the ‘Europe in the World’ portal.
- The outreach to specialist stakeholders through conferences can be substantially improved through web-streaming and targeted digital marketing (email and SMS).
- Successful events and conferences were often those that served to bring coherent policy-communities together for networking and were thus able to attract high profile outside speaker, for instance, for Voices of Development Aid.
- It is possible to influence attitudes and opinions about policies if opinion-makers are carefully targeted at an early stage through seminars, briefings and carefully designed fact-sheets. DG BUDG was thus able to re-balance UK media coverage in response to the annual Court of Auditors Report.

- Particularly designed surveys and statistics can have an impact on policy-makers and opinion-makers by ranking member states (ECFIN) and can increase understanding of and support for certain EU initiatives, e.g. compiling statistics prepared by TAXUD.

Not-so-good practices

- Producing and distributing free print publications aimed at specialist audiences who would be either prepared to pay for them or do not need them. Alternatively, pricing publications but then distributing a large proportion free therefore undermining the sales potential and attractiveness to professional outlets.
- Initiating publications in response to in-house interests in visibility for policies or personalities without due consideration for whether there is a need among target audiences for such information.
- Short, moderately resourced and hastily organised information campaigns to support new initiatives, which require a lot of administrative work for little sustained impact and bring with the risk of falling victim to badly performing contractors.
- Using media channels not suitable for certain effects, for instance, employing TV to convey complex political messages to the general public.
- Organising or appearing at events that attract the wrong target audiences, or in the wrong context/framework.
- Producing too many and too long VNRs without assessment of demand by TV and potential target audiences.
- Producing information/leaflets, but not thinking about effective distribution and supporting/alternative means of communication, hoping that the ‘the truth will attend to itself’.

We will return to some of these examples in the following section on resources and the final chapter with recommendations.

3.3 Resources

3.3.1 Overview of Human and Financial Resources on Communication

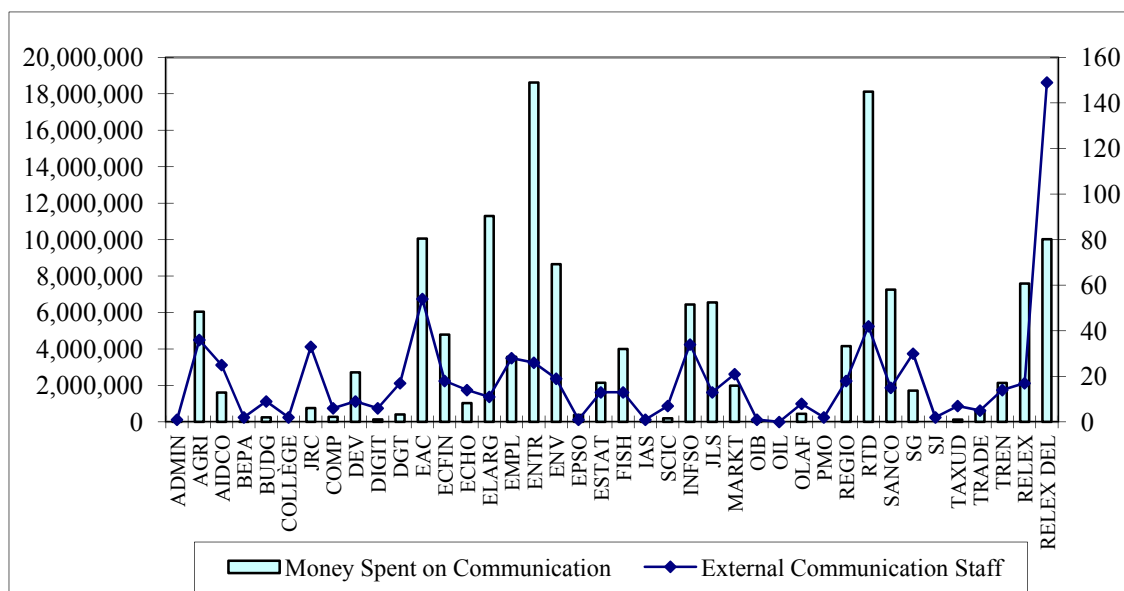
According to the screening by DG BUDG, the total operational budget of the European Commission for communication and information was €287.6 million in 2006.¹⁵ These financial resources are widely dispersed across many budget lines and are managed DG by DG in a much decentralised way. The communication budgets of the DGs vary strongly in terms of size and administrative conditions for spending (e.g. co-financing of communication activities with Member states in DG REGIO or DG AGRI in the framework of multi-annual programmes). By far the largest coherent part is the operational budget of DG COMM, which falls under budget title 16 (Communication) and amounted to €80.9 million (operational commitment outturn) in 2006. The second-

¹⁵ For a full overview see Annex 3.

largest part is linked to the publications office OPOCE, but one has to keep in mind that OPOCE is at the service of all EU institutions and agencies, not just the Commission. According to its analytical accounts, 74% of its publications were carried out for the Commission in 2006. Also, the budget for its own external communication activities is rather small. Budgets of line DGs are significantly smaller than that of DG COMM with the largest being DG ENTR and DG RTD (see Figure 10).

Concerning human resources, a recent screening by DG ADMIN shows that there are 1,903 persons working on communication and information issues across the Commission.¹⁶ Not surprisingly, DG COMM again has the largest share of personnel (665 persons). The chart gives an overview of communication staff and financial resources in relation to overall staff and operational budget in a number of line DGs.

Figure 10. Comparison between Communication budgets and staff



Note: Budget figures only cover expenditure managed directly by DGs, i.e. not expenditure that falls under 'shared management' rules with Member states (e.g. DG AGRI, DG REGIO). The second RELEX reference at the far right pertains to RELEX delegations.

Source: Screening of communication resources from DG BUDG and DG ADMIN.

The figure illustrates significant differences between DGs and also shows that a relatively high number of staff in a DG does not necessarily correlate with a relatively high amount of financial resources. The relatively high number for HR in DG EAC can be explained by staff working on communication that is not confined to the DGs policies, namely the Commission's visits centre.

As regards satisfaction with resources, answers to our questionnaire show that there is again no general answer for all DGs. Table 4 below illustrates that while about half of the DGs believe to have sufficient resources, the other half does not.

¹⁶ The figures obtained from this screening date from April 2007 and have been validated by DGs.

Interestingly, the proportion between content and discontent DGs is approximately the same both for human and financial resources. However, DGs that perceive shortcomings for human resources are not always identical with those that claim shortage of financial shortcomings, which is another indication for the diversity among DGs.

Table 4. DG satisfaction with resources

DG/Service	Satisfied with Number of HR	Satisfied with Financial Resources
AIDCO	+	+
BUDG	+	-
DEV	+	+
DIGIT	+	+
ECHO	+	+
ELARG	+	-
EMPL	+	-
INFSO	+	+
OPOCE	+	+
JRC	+	+
REGIO	+	+
RELEX	+	+
TRADE	+	no answer
ADMIN	-	+
COMM	-*	Depends on unit
EAC	-	-
ENV	-	-
ESTAT	-	+
FISH	-	-
MARKT	-	+
RTD	-	-
SCIC	-	-
TAXUD	-	+
TREN	-	-
SATISFIED	54%	59%
NOT SATISFIED	46%	41%

* Except for inter-institutional relations, coordination, planning

It is also interesting to note that the negative assessment made by four DGs on their HR situation (EAC, ENV, FISH, MARKT) stands in contrast to their relative percentage of communication staff, which is actually above the average of their respective DG family.¹⁷

¹⁷ Based on figures from DG ADMIN.

The following table provides an overview of the repartition according to job profiles of the Commission's communication staff.

Table 5. Repartition of job profiles

Job Title	Grade	Absolute Number	Percentage	Number of DGs disposing of at least 3 officials with the respective job title (Top 3 with numbers)
Information and Communication Officer	AD	241	22.7%	24 COMM (47), RTD (24), INFSO (20)
Information and Communication Assistant	AST	289	27.2%	26 COMM (97), RTD (24), JRC (14)
Proof-Reader	AST	136	12.8%	1 OPOCE (135)
Webmaster-Editor	AST	101	9.5%	13 COMM (25), EMPL (10), EAC (6), INFSO (6)
Press and Media Officer	AD	64	6.0%	1 DG COMM (49), RELEX DEL (3), SANCO (3)
Publications Productions Agent	AST	63	6.0%	1 OPOCE (56)
Trainee	--	34	3.2%	2 COMM (15), INFSO (4)
Spokesperson	AD	32	3.0%	1 COMM (31)
Publications Officer	AST	25	2.3%	2 OPOCE (5), COMM (3)
Public Relations Officer	AST	19	1.8%	2 COMM (7), JRC (3)
Graphic Designer	AST	19	1.8%	3 OPOCE (5), RTD (5), OIB (3)
Press and Media Manager	AD	17	1.6%	1 COMM (15)
Press and Information Manager	AD	12	1.1%	2 COMM (6), RELEX DEL (3)
Speechwriter	AD	11	1%	Only 1 or 2 (across 7 DGs)
TOTAL	--	1063	100%	--

Source: Figures provided by DG ADMIN based on JIS-query.

As can be seen from the table, communication support staff is quite dispersed across DGs. For example, of the 101 listed webmasters/ editors in the job query by DG ADMIN, 25 are in DG COMM,¹⁸ 10 in DG EMPL, 6 in each DG INFSO and DG EAC. The rest is spread across 26 DGs and services that all have between one and 4 webmasters. 14 DGs have their own Publications Officer(s) (besides the 5 in OPOCE and 3 in DG COMM) and 5 DGs have an own Publications Production Agent (AST)

¹⁸ Including webmasters in representations.

(besides the 56 in OPOCE). There are also 7 DGs that have one or several Graphic Designers (AST). The dispersal of communication support staff raises questions about the efficient allocation of resources. This particular issue is addressed in a special section on ‘allocating and managing functions and resources’ in Chapter 4 that deals specifically with the communication support services. Qualification of staff will be addressed under point 3.3.3 in this section.

To put the overall situation of the Commission in relation, a comparison with resources of national authorities can be instructive. A crude indicator is the compared expenditure on communication in relation to the overall budget and/or the number of citizens to be reached. In the following table we have compared the central communication service with the most significant budget in the Commission (i.e. DG COMM) to the central governmental information authority of a large decentralised Member State: The German Federal Press Service (‘Bundespresseamt’ – BPA).¹⁹

Table 6. Comparison between German Federal Government and the Commission: Absolute & relative expenditure and human resources relating to public communication

	German Federal Govt. Budget: €24 billion (2006)^a 82 million citizens	European Commission Budget: €18.6 billion (2006)^b 494 million citizens
Operational expenditure of central communication office	BPA: €63 million	DG COMM: €80.9 million
<i>Expenditure as proportion of overall budget / population</i>	0.03% € 0.77 per citizen	0.07% € 0.16 per citizen
Personnel involved in public communication (2007)	802 ^c (285 in ministries, 517 in BPA)	1063 (= JIS query, 07/07) OR 1903 (= ADMIN screening, 09/07)
Personnel involved in public communication (proportion of overall number of officials)	Approx. 3.5% (not counting press officers; possibly slightly higher) Total approx. 23,900 staff ^d	Between 3.5% and 6.5% (depending on figure above) ^e Total approx. 29,000 staff ^f

^a Does not include €37.5 billion of annual debt service (see website of the Federal Ministry of Finance at: <http://www.bundesfinanzministerium.de/bundshaushalt2006/html/vsp2i-e.html>).

^b According to figures provided by DG BUDG.

^c Figures taken from the official reply of the German government to a formal inquiry from Volker Wissing, Member of the German Parliament.

^d See Der Öffentliche Dienst in Deutschland, page 9:

(http://www.bmi.bund.de/clin_028/nn_882848/Internet/Content/Broschueren/2006/Der_oeffentliche_Dienst_in_Deutschland_Id_79239_de.html).

^e For this particular comparison, the figure resulting from the JIS query appears more appropriate, as the figures for the German government are not the result of a comprehensive screening exercise and therefore only include staff with formal job descriptions relating to communication.

^f See http://ec.europa.eu:8082/civil_service/about/figures/index_en.htm. For better comparability staff from OIB, OIL, PMO and translators/interpreters were not counted, so that the total of staff amounts only to about 29.000 instead of 34.381 in the ADMIN screening.

¹⁹ See website of the Federal Press Agency (Bundespresseamt), at: <http://www.bundesregierung.de/Webs/Breg/DE/Bundesregierung/Bundespresseamt/bundespressamt.html>

The table indicates that the Commission does not spend less in proportion to overall expenditure on communication than the German federal government, yet it spends considerably less in proportion to its immense constituency. With regard to human resources, there seem to be rather more people involved in communication activities in the Commission than in the administration of the German national government, but it has to be said that even with the adaptations made figures are not fully comparable.²⁰

The comparison must also be regarded with a lot of caution due to contextual factors. For example, the figures cannot adequately reflect the additional challenge of multilingualism and social diversity that the Commission faces, although the more than 3000 translators and interpreters were not counted. There is still no common European public space and no common media landscape in the EU. This represents a real challenge, especially in view of the Commission's aim of 'going local'.²¹ National governments also dispose of further resources that are used to explain and justify decisions to the public, which are weakly developed at the European level (e.g. political parties represented in government with their respective communication budgets and personnel). The comparison can therefore only have a very indicative value.

3.3.2 Links to Priorities and Target Groups: Are Resources allocated effectively?

One major aspect that makes answering this question difficult has already been mentioned in the previous part: DGs often formulate their objectives and target groups in large terms and operationalise them rather in terms of communication output than effect. With priorities defined in such a way, little effort has to be made by DGs to establish a somewhat plausible link between objectives/target groups on the one hand and their resource allocation on the other. This is particular problematic in the field of communication, as there are literally unlimited possibilities for communication. In interviews and questionnaires it was repeatedly brought up that "one could always do more" with one person putting it in particularly clear terms: "We could employ another 1000 people and would find something sensible to do for them."

From questionnaires and interviews we got the impression that despite their stated objective to communicate with the wider public directly, a considerable number of DGs are currently not in the position of living up to this task. According to the 2005 Action Plan, 'going local' requires "*the Commission's communication activities to be resourced and organised in such a way as to address matching demographic and national and local concerns, and to convey information through the channels citizens prefer in the language they can understand.*"²² From the perspective of resources, it must be stressed that even for DG AGRI (a sectoral DG with a relatively large

²⁰ For example the 762 officials in DG COMP partially carry out tasks that a federal agency (Bundeskartellamt) takes care of in Germany and whose staff is not counted in.

²¹ According to the 2005 'Action Plan on Communication', for 'going local', it is needed that "*the Commission's communication activities must be resourced and organised in such a way as to address matching demographic and national and local concerns, and to convey information through the channels citizens prefer in the language they can understand.*", (see Action Plan, p. 4, at http://ec.europa.eu/DGs/communication/pdf/communication_com_en.pdf).

²² See Action Plan, p. 4 (http://ec.europa.eu/DGs/communication/pdf/communication_com_en.pdf).

communication budget) an external evaluator has attested that its financial resources of approximately €6 million were “small by any standards”.²³

DG AGRI’s communication budget is based on a Council regulation that defines the broad communication objectives and target groups,²⁴ but also DGs that have more freedom of setting priorities often only dispose of resources that do not match their objectives. For example, one DG stated in the questionnaire that “our objectives are adapted to our resources”, just to explain that “therefore we mostly concentrate on objective 1 [information and transparency]. If we were to do [objective] 2 [promoting the visibility of the DG] and [objective] 3 [encouraging changes in people’s behaviour] in a way which has a significant impact on citizens, our resources would be ridiculously small.” The question must then be raised, however, whether such ‘unrealistic’ objectives do not hold a too large potential for inefficient use of resources. Under conditions of rather limited budgets, DGs are prone to follow a piecemeal approach that risks having little effect – at least if their ‘primary target group’ is also the general public (which was stated to be the case by 68% of DGs).

The only DG where the objective of ‘going local’ has been matched by an increase in financial and human resources is DG COMM (see also Chapter 5 on Representations). As the table below illustrates, the increase for the budget line for ‘going local’, communication (16 03) was higher than for the other ones in the operational budget of DG COMM.

Table 7. Operational budget DG COMM (Commitment appropriations)

Budget Chapter	Title	2006	2007
16 02	Communication and the Media	€24.1 million ^a	€27.7 million
16 03	‘Going Local’ communication	€15.6 million^b	€22.8 million
16 04	Analysis and communication tools	€22.3 million ^c	€24.2 million
16 05	Information Relays	€16.8 million ^d	€16.8 million
Total		€78.8 million	€91.5 million

^a This amount does not take into account a reserve of €1 million.

^b This amount does not take into account a reserve of €1.5 million.

^c This amount does not take into account a reserve of €0.5 million.

^d This amount does not take into account a reserve of €1 million.

Source: DG COMM.

²³ Deloitte Consulting SCRL: Evaluation of the Information Policy on the Common Agricultural Policy, Final Report – December 2006, p. 12. The sum of €6 million only includes expenditure managed *directly* by the DG, i.e. not expenditure that falls under ‘shared management’ by Member States.

²⁴ In article 1 of Council Regulation No 814/2000 two out of four objectives listed are clearly aimed at the public at large (“*promoting the European model of agriculture and helping people understand it*” and “*raising policy awareness of the issue and objectives of that policy*”).

In 2007 the increase in resources under budget chapter 16 03 allows to carry out additional actions on priority issues, particularly in Representations. This includes for example actions linked to the 50th anniversary of the Treaties of Rome, which was mentioned to us across DGs as a successful example of a ‘corporate communication effort’. The increased resources also allowed for additional activities linked to the energy and climate change project team and other communication priorities. In 2007 two new pilot projects are launched.²⁵

As stated already above, there is an increasing number of DGs with external communication strategies (in place or forthcoming). Indeed 19 out of 29 DGs surveyed have clearly stated to have a communication strategy and several DGs have mentioned that they are following a more “strategic approach” for communication than in the past. This will potentially have a positive effect on the allocation of resources. For example, DG RTD demands in its external communication strategy that for each of the DGs major communication actions the following questions would have to be answered:

- What is the objective, the target and the expected outcomes?
- What are the resources available and what is the source?
- Which subcontractors will be used (if any)?
- What is the detailed budget?
- What staff resources will be used?
- Is there a need to involve other DGs?

DG REGIO’s Information and Communication Plan 2007 points to another aspect that is essential for an effective use of resources: an integrated approach that combines different tools. As it is also explained in the annex of this study, no communication tool should be regarded ‘a priori’ as good or bad, as it is rather the effective combination of tools that leads to an efficient use of resources. Following such an approach, the four major conferences of the DG in 2007 have been all combined with a series of targeted paper and online-publications. A more holistic approach has also been taken up by other DGs in the recent past (e.g. DG EMPL).

Furthermore, the efficiency and effectiveness of any given tool must always be seen in the context in which it is used. Since this context varies widely from DG to DG, the same allocation of resources can be very appropriate for reaching the communication objectives of one DG, but rather questionable for another. It would go beyond the scope and possibilities of this study to assess for each DG whether its allocation of resources is appropriate, but the following table gives an overview of the respective budgets and the resource priorities per DG.

²⁵ Two new pilot projects were included in DG COMM’s programme during the budgetary procedure for 2007. To this end, two specific budget lines were created and the corresponding funds were added to DG COMM’s 2007 budget. The two projects are: (1) “EuroGlobe”: a mobile Globe theatre aiming to foster a European public space and (2) a pilot information network (PINs) that intends to create networks of opinion-formers from the national and European level based particularly on the internet.

Table 8. Allocation of resources and budgetary priorities of DGs/services

DG/Service	TOTAL 2006 (in million €)	Resource priorities (Share of budget in %)
		Audiovisual (27%) Conferences/Events (22%) Contact Centres / Relays (20%)
COMM	80.90	
OPOCE	62.51	Procurement + Official Journal (77%)
ENTR	18.61	Contact Centres / Relays (70%)
		Publications (34%) Audiovisual (31%) Conferences (31%)
RTD	18.12	
ELARG	11.30	Contact relays (47%)
EAC	10.06	Large Campaigns ^a (78%) Publications (24%)
ENV	8.66	Publicity Campaigns (23%)
SANCO	7.26	Contact Centres / Relays (56%)
JLS	6.55	Internet (22%)
INFSO	6.44	Conferences/Events (47%)
AGRI	6.04	Conferences/Events (84%)
ECFIN	4.79	Conferences/Events (23%)
		Publications (37%) Conferences (30%)
REGIO	4.15	
FISH	3.99	Publicity Campaigns (49%)
DEV	2.72	Audiovisual (23%) Media Relations ^b (24%) Audiovisual (20%)
RELEX	3.62	
EMPL	3.57	Publications (73%) Publications (36%) Contact Centres / Relays (34%) Internet (28%)
ESTAT	2.15	
		Publications (32%) Audiovisual (27%) Public Consultations (21%)
TREN	2.14	
MARKT	1.98	Contact Centres / Relays (55%)
		Publications (60%) Internet (40%)
SG	1.72	
		Publications (23%) Audiovisual (25%) Internet (20%) Media Relations (20%)
AIDCO	1.61	
ECHO	1.03	Conferences/Events (40%)
		Publications (39%) Internet (39%)
TRADE	0.63	
OLAF	0.44	Publications (56%)
DGT	0.41	'Missions d'information' (37%)
EPSO	0.38	Publicity Campaigns (70%)
COMP	0.28	Publications (65%)
BUDG	0.25	Publications (77%)
		Internet (68%) Conferences/Events (32%)
SCIC	0.20	
	0.13	Internet (62%) Conferences/Events (38%)
DIGIT		
TAXUD	0.13	Publicity Campaigns (72%)
ADMIN	0.01	Internet (100%)

^a e.g. European Year of Intercultural Dialogue.

^b Seminars for journalists. The total budget of DG RELEX is €7.59 million, but includes also some significant expenditure for the RELEX-family and expenditure on delegations.

Source: Based on screening by DG BUDG.

According to the table, 12 DGs have printed publications as (one of) their resource priorities. These DGs range across all policy areas and budget size (AIDCO, BUDG, COMP, EMPL, ENV, ESTAT, OLAF, REGIO, RTD, SG, TRADE, and TREN). In interviews and questionnaires we were told that DGs were reacting to demands of their stakeholders who sometimes wanted information in hard-copy, especially in the context of large events and conferences. Others pointed to in-house demands (e.g. Commissioners wanting to “present” something) or to a legacy of the past (e.g. DG EMPL that spends 73% of its budget on publications). The evolution of resources since 2004 shows however that the share of publications has decreased markedly over the last years.²⁶

Several DGs have confirmed this tendency that is also mentioned in the recommendations of some evaluations (e.g. DG RTD which was told to “*limit print publications to the minimum and give preference to electronic information in print friendly format*”)²⁷ which suggest that further efforts in this direction can be expected in the future. As regards the management of publications, we were told that evaluation of readers’ satisfaction (if available at all) is not yet taken into account sufficiently. Indications from OPOCE underpin this impression: While storage costs of 5 to 10% for a large publication were mentioned as normal, they are sometimes much higher.

It can also be taken from the table above that 10 DGs invested more than 20% in **conferences and events**. Among those with a budget larger than €1 million are two DGs under shared management rules (REGIO, AGRI) as well as two DGs from the “Research-family” (RTD, INFISO), DG COMM and DG ECFIN.

As an example, DG RTD mentioned the “Communicating European Research” – event with close to 3.000 participants and DG INFISO spent almost half of its communication budget in 2006 on its annual IST-event (€3.3 million).²⁸ The latter attracted almost 4,500 delegates from the information and communication technology sector. Both DGs have a clearly defined stakeholder-community and deal with complex issues. In such a context large conferences are a potentially very effective tool. Also concretely, the IST-event was judged to be an example of effective allocation of resources by an external evaluation that concluded: “The IST 2006 Event was very successful in meeting its objectives, both in terms of the orientation given by the Commission and the event’s broader interactive aims.”²⁹

Also DG REGIO organises 10 conferences a year of which 4 are very large. For example, in October 2007 the “Open Days - European Week of Regions and Cities” for about 5,000 regional policy experts and practitioners are taking place in Brussels.³⁰ It was stated by the DG that it strongly depends on its networks due to the mode of implementation of its communication activities (mostly financed under ‘technical

²⁶ See Figure 9 “Budget share by category, comparison 2004-200” in section 3.2 above.

²⁷ The Evaluation of the Communication Activities carried out by DG Research, 2007.

²⁸ See http://ec.europa.eu/information_society/istevent/2006/index_en.htm.

²⁹ The Evaluation Partnership: Evaluation of the Information Society Technologies (IST) Event – Final Report, March 2007, p. 3.

³⁰ See http://ec.europa.eu/regional_policy/conferences/od2007/index.cfm. The conference is organised jointly with the Committee of the Regions.

assistance' that is linked to structural funds). A large conference like the 'Open Days' gives DG REGIO an opportunity to build and reinforce these networks and communicate its policy objectives to a large number of potential multipliers.

Table 7 also shows that further 6 DGs spend 20% or more of their operational budget on the production and diffusion of **audiovisual** material. Besides the audiovisual unit of DG COMM, these DGs are from the RELEX-family (AIDCO, DEV, and RELEX) and the Research-family (RTD, TREN). Production of audiovisual material is comparatively expensive, so that products that do not meet the expectations of the audience or only reach a small number of people are problematic. We were told that the trend to more edited audiovisual productions in some line-DGs hold the risk that video-news-releases (VNRs) might become the "new publications" – thus referring to problems with (lack of) coordination and up-take by the audience. The audiovisual unit in DG COMM deliberately does not produce edited material and also discourages other DGs to produce VNRs unless they are targeted at a very clearly-defined audience or event (e.g. at a launch event of a programme or a large conference). In this context it should be noted that the most viewed clips on EU-tube were either

Linked to a topical issue providing additional insights not available in other media (e.g. the fires in Greece from the perspective of European fire fighters) OR

Short contributions with a clear message that are linked to a special event relevant for viewers (e.g. launch of the FP7-programme) OR

Short and entertaining (e.g. advertisements of the MEDIA programme).

The video clip advertising the 'European Job Days' could be cited as an example of good practice, as it got 9.400 hits within the 10 days in the run up and during the event that took place all over Europe. Long clips of more than five minutes which focus primarily on the merits of a particular policy area appear to be particularly problematic for a platform like EUtube.

In this context, it should also be mentioned that DG COMM has built up considerable expertise in the audiovisual area, which holds a large potential for more efficient use of resources. The audiovisual unit manages tools that are of potential interest for most DGs, for example a considerable number of framework contracts for audiovisual productions, the Commission's audiovisual archives and library, Europe by Satellite (EbS) and studios. It was repeatedly stated in interviews with line-DGs that the framework contracts offered by DG COMM were appreciated. The AV-unit disposes of sufficient financial resources, but it has limited staff, which currently restricts its capacity to react to the demands of other DGs.

Generally it can be said that the potential for increased efficiency does not seem to lie so much with the quality of any one given action or programme³¹, but rather with duplication of activities and a lack of coordination among DGs. A term that was mentioned to us during one interview was the "silo mentality" of the different services.

³¹ The great majority of external and internal evaluations that we received from DGs were rather positive about the efficiency and effectiveness of the

Besides a lack of coordination for printed publications another prominent example are the Commission's **websites**, which were described as a "jungle" by several interviewees. Even if all individual websites were very good, it remains a problem for the average user to navigate through the wealth of information and find the information needed. Recently efforts have been made to implement a common content management tool across DGs, but that has only led to a common banner on top of each site (see also the coordination chapter). From a strict resource point of view, the internet is not yet the main problem. Besides DG JLS, mostly DGs with smaller external communication budgets spent relatively large proportions of their financial resources on the internet (see above: AIDCO, ADMIN, DIGIT, ESTAT, SCIC, SG, TRADE). Looking at the general trend, however, uncoordinated efforts are likely to become increasingly costly in the future.

Another area where economies of scale have been mentioned to us are the numerous networks of the Commission. As the table above shows, there are 6 DGs that spent considerable amounts of their financial resources on **contact centres and relays**. Besides DG COMM these are ELARG, ENTR, MARKT, SANCO and ESTAT. According to a 2005 study from DG EAC, there are 8 networks for communication on mobility issues alone. While it is certainly true that most networks have specific tasks and address specific stakeholders, there appears to be potential for working together more intensively. It should be noted that according to DG ENTR, the two networks that the DG manages – Euro Info Centres (EIC) and Innovation Relay Centres (IRC) – will be merged at the beginning of 2008 and the activities of their communication correspondents will be assured by the Executive Agency for Competitiveness and Innovation (EACI). In 2006 the financial resources for the networks of DG ENTR corresponded to 70% of the DGs total communication budget in 2006 and to 31% of the total sum spent by the Commission on contact centres and relays (i.e. €13 million out of €41.5 million). It can be assumed that a merger holds a significant potential for economies of scale in the area of communication. Another good practice that we have come across is the cooperation between the Citizens' Signpost Service (CSS) of DG MARKT and the Europe Direct contact centre managed by DG COMM. While the CSS concentrates on the right of EU citizens in the internal market (particularly linked to the 'four freedoms'), the Europe Direct contact centre has a more general scope. Specific questions linked to mobility and rights in the internal market are thus routinely passed on to the CSS. According to the Europe Direct Newsletter, 42% of questions that the CSS receives actually come from the Europe Direct contact centre.³²

One important issue that is not treated in this section, but that also has an important impact on the efficient use of resources is external contracting. Particularly DGs that are short of staff, but do relatively well on financial resources tend to contract out on their communication activities. This particular aspect is addressed in greater detail in a section on 'external contracting' in Chapter 4 ("communication support services").

³² See Europe Direct Newsletter No.8, September 2007, p. 9 (http://ec.europa.eu/europedirect/docs/newsletter/newsletter_08_07_en.pdf).

3.3.3 Qualification of communication staff

Concerning the qualification of staff, there has been a marked difference between the results we received from questionnaires and statements that we heard during the interviews. Answers to questionnaires resulted in 7 out of 22 DGs that responded to this question stating that 90 percent or more of its staff had a professional background in communication. The DG-average was still at 74 percent. The results can at least partly be explained by a misunderstanding in the questionnaire.³³ As an indication for a realistic assessment of the status-quo, one could take the answer of DG ECFIN: “*If [professional] experience [in communication] is meant to mean experience outside the Commission [the answer is] 1/3, if Commission experience [is] included [the answer is] 3/4.*” This result would correspond to the answers we received during interviews where a lack of professional qualification was brought up repeatedly. Particularly problematic seems to be the qualification of communication and information officers (i.e. AD-level). This was partly explained with a “legacy of neglect” for communication and it was pointed to the fact that until very recently there had not been specialised competitions for communication experts at AD 5-level.³⁴ As a consequence, successful candidates usually had a background in law, economy, administration, etc. and were therefore (understandably) much more motivated and qualified to work in other areas than communication. Besides this, it was stated, that communication and information tasks were generally not very highly regarded in the expert-dominated environment of the Commission. One interview partner said that many colleagues in other units would think that “*communication can be done by everybody*”. However, many people interviewed also indicated that a certain change of attitude could recently be felt within the institution and that especially since the no-votes to the Constitutional Treaty communication tasks were taken more seriously.

Besides the on-going competition for communication specialists, another initiative was frequently mentioned during interviews: an increasing inclusion of the regular staff in communication tasks. The 2005 Commission Action Plan on Communication³⁵ states that “*the staff members of the Commission are its first ‘ambassadors’ in presenting and personalising EU policies to the public.*” In line with ‘action 11’ from the annex of the Action Plan, DG ADMIN offers communication courses for staff and a pool of public speakers has been initiated.³⁶ The Action plan also refers to “current best practices” that were also mentioned to us in interviews (e.g. DG AGRI’s “Green Team”). In several

³³ What was meant as a precision of the question (i.e. “relevant university degree and/or three years of work experience”) had been understood by some in that sense that 3 years *within* the Commission would also count, while the actual meaning was that staff had been working on communication issues *outside* the Commission before being recruited. The limited time frame of the study and a number of late replies did not allow us to check the results with the individual DGs.

³⁴ According to the questionnaire from DG COMM the competition for communicators “will, in time, increase the pool of communication talents available. However, this will not be in place before well before 2008.”

³⁵ Action Plan, p. 7, (http://ec.europa.eu/DGs/communication/pdf/communication_com_en.pdf).

³⁶ Annex to Action Plan, p 5, (http://ec.europa.eu/DGs/communication/pdf/communication_annex_en.pdf).

DGs there seem to be plans to follow these best practices. To provide staff with a clearer idea of the rules applicable for public communication, “*General Guidelines for ‘Staff as Ambassadors’*” were adopted by the College in July 2007. It provides guidelines that include a number of “core principles of conduct” (objectivity, impartiality, loyalty, discretion, circumspection) and explain the rules for communication under different conditions (“speaking to the public as part of your work”, “speaking’ on the internet”, “recording or publication of presentations”, “contacts with the media”). One problem that currently exists however is the lack of incentive to participate in such initiatives on top of regular work. The same is true for communication training that does not even receive particular recognition in all DGs for the career development of those officials who have clear communication tasks included in their job description. With the marked exception of the members of the spokespersons service (who have participated to a large degree in media training), incentives for devoting time to media or communication training are apparently still too low.

3.4 Evaluations

3.4.1 Sufficient ex-ante and ex-post evaluations?

A recent Communication from the Commissioner for Financial Programming and Budget states that the “*Commission has a well-established evaluation system – a statement which mainly holds for evaluation of expenditure programmes*”.³⁷ This statement is then substantiated with findings from an independent study. However, during our interviews we also heard that the Commission would still lack an ‘evaluation culture’ in certain areas, which would especially apply to the area of communication. At the same time it was stressed that significant progress had been made in recent years and that, generally speaking, the institution was ‘on the right track’.

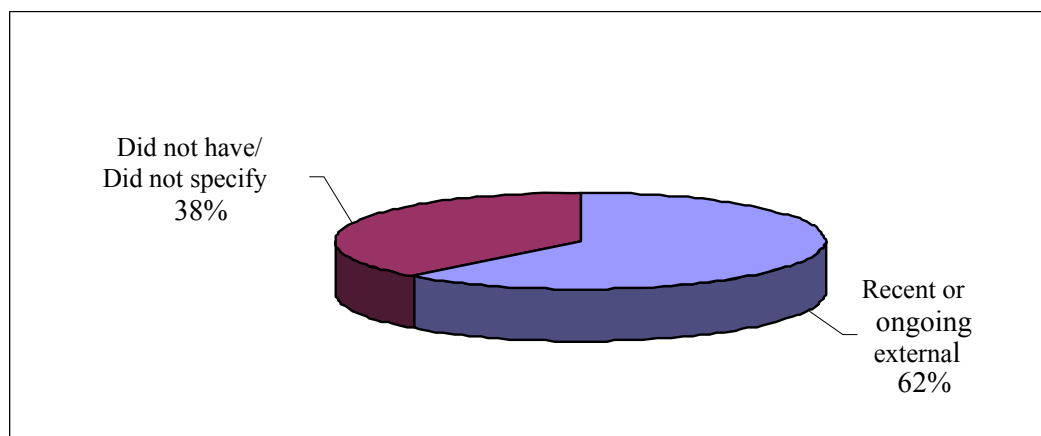
Such statements are also supported by some quantitative findings, as the Commission’s own figures show that until very recently there was a lack of evaluation in the field of communication. For example, during the period 2000-2005 the Commission made only 19 evaluations out of 678 that dealt with activities and programmes in the field of communication or information.³⁸ Since 2004, however, an upward trend can be detected that has again markedly gained in strength in 2006. On the basis of Commission figures for 2006, we identified 9 DGs that completed between one and four evaluations of communication activities, leading to a total of 18 evaluations in the field for that year

³⁷ ‘Responding to Strategic Needs: Reinforcing the Use of Evaluation’, Communication to the Commission from Ms Grybauskaitė in Agreement with the President, SEC (2007) 213, Annex I, p. 15, (http://ec.europa.eu/information_society/media/docs/overview/evaluation/eval_comm_sec_2007_213_en.pdf).

³⁸ See also Kurpas, Sebastian, De Clerck-Sachsse, Julia, & Brüggemann, Michael (2006). *Informing European Citizens? Evaluating the activities of the European Commission in the field of Information*. Brussels, Centre for European Policy Studies, p. 2 (http://shop.ceps.eu/BookDetail.php?item_id=1406).

alone.³⁹ Answers from the questionnaires also showed that the vast majority of DGs surveyed have carried out at least one evaluation of their communication activities since 2004 or are in the process of doing so:

Figure 11. External evaluations



Source: Own elaboration.

As Table 9 shows, the scope and subjects of evaluations vary widely. They range from large campaigns⁴⁰ and events⁴¹ to specific tools⁴², stakeholder-relations⁴³ and programmes.⁴⁴ Three DGs – DG AGRI, DG AIDCO and DG RTD have recently also carried out comprehensive external evaluations of their information and communication policies. (In DG ECFIN and DG TRADE comprehensive evaluations are on-going; DG REGIO's external communication policy is subject to permanent external evaluation.) Although differing in methodology and structure, the three evaluations give a good picture of weaknesses and strengths of the respective DGs communication policy and result in clear recommendations.

³⁹ The DGs identified are the following: MARKT, AIDCO (1 each); COMM, EAC, ENTR, SANCO, TRADE, AGRI (2 each), INFSO (4).

⁴⁰ E.g. climate change campaign (DG ENV), anti-smoking campaign (DG SANCO), roaming campaign (DG INFSO)

⁴¹ E.g. IST-event (DG INFSO)

⁴² E.g. Citizens' Signpost Service (DG MARKT), EU Market Access Database (DG TRADE), EURES communication activities (DG EMPL)

⁴³ E.g. communication links with SME-stakeholders (DG ENTR)

⁴⁴ E.g. e-content programme or MEDIA Plus/MEDIA Training programmes (DG INFSO)

Table 9. Evaluations since 2004

DG/Service	Evaluations since 2004
AGRI	CAP information policy Co-Financed info & promotion programmes for agriculture products in non-community countries Assessment of Communication, Information and Promotion Programmes Concerning Beef and Veal within the European Union
AIDCO	DGs Info & Communication Initiatives in 2007
COMM	Conventions and co-financing projects with Euronews in the period 1993-2003 (2004) Audiovisual services and production unit (ex ante, 2005) Europa-website (still on-going) Decentralisation of the PRINCE campaign (2004) Newletters of the Representations (2006) Information relays and networks (2003) Major information centres (2004) Europe Direct service (2005) European Documentation Centres (still on-going) Europe Direct relays network (still on-going)
DEV	Information Work of Delegations in ACP countries Communication of Development issues in New Member states (ex-post)
EAC	Visits service of the European Commission Mechanisms for the dissemination and exploitation of results arising from programmes and initiatives managed by the DG European Year of Education Through Sport
ECFIN	All communication activities since 2004 (still on-going)
ECHO	Information Grant Facility Visibility of humanitarian partners (still on-going)
EMPL	Publication „Social Agenda“ (2004) EURES activities with focus to info/comm (2005) European Year of Workers' Mobility with strong communication component (still on-going) ESF info/comm activities (2007)
ELARG	Unspecified. On average one activity per year, e.g. in 2004: Global assessment of the implementation of the communication strategy on enlargement
ENTR	Communication Links with SME stakeholders Innovation Relay Centres Network (mid-term evaluation)
ENV	Climate change campaign (internal) Evaluations of campaigns (internal, ex-ante) Green week (yearly internal ex-post evaluation)
INFSO	IST-event, IST-TV, IST-Prize INFSO Publications Analysis of Networks of Innovation in information society development & deployment in Europe (external impact assessment) Roaming campaign (internal evaluation)
JRC	Not specified. According to the JRC all information activities are subject to an internal ex-ante evaluation and approx. 50% to an internal ex-post evaluation.
MARKT	Citizens' Signpost Service (2005/2006) FIN-USE General evaluation of communication activities scheduled for end 2007/early 2008
REGIO	DGs information and communication strategy and activities (permanent)
RTD	DGs external communication activities

SANCO	EU strategy to support member states in reducing alcohol related harm (impact assessment) Better training for safer food (impact assessment) Anti-smoking campaign
TRADE	DGs external communication activities (still on-going) Civil Society Dialogue (CSD) European Union Market Access Database (MADB); Export Helpdesk for Developing Countries
TREN	Info & communication actions of the DG 2000-2003 Communication policy audit, 2006 (internal)

Source: Taken from questionnaires and list provided by DG COMM. Taken from questionnaires and list provided by DG COMM; evaluation external & ex-post if not indicated otherwise.

In terms of numbers, DG COMM stands out with 10 evaluations, which can of course be explained with the special policy focus. However, together with DG INFSO, DG COMM has also seen the strongest increase in evaluations during the last two years. According to DG COMM this is due to the fact that an evaluation function was introduced in 2003, which was then formally transformed into a unit in 2006. In October 2006 an internal evaluation charter for the DG has been adopted that was recognized as exemplary by DG BUDG.⁴⁵ The charter summarises the general provisions applicable for evaluations in the Commission, defines the mission, objectives and statute of the evaluation function in DG COMM, describes the involvement of different actors in evaluation activities within the DG and finally outlines in detail the procedure of an evaluation.

At present DGs do not follow a unitary approach concerning the management of evaluations. DG COMM, for example, applies a decentralised approach outlined in its charter. According to this, the operational units are responsible for the evaluation of their own activities. The evaluation unit itself takes the role of coordinator and technical assistant, assisted by an internal network of evaluation correspondents in each operational entity. Other DGs follow a more centralized approach where the evaluation unit is directly in charge. It is impossible to say which approach is the better one, as both have their advantages and disadvantages. A centralized approach allows the in-house experts to manage the process directly (which can mean that operational units are less absorbed with managing the evaluation), while a decentralized approach potentially gives the unit concerned a stronger ‘sense of ownership’. In the latter case it must be ensured, however, (as it is the case in DG COMM) that the evaluation is guided by a steering group that is not exclusively made up of officials from the directorate concerned. If other DGs are concerned they also have to be represented. Generally, the increased importance of evaluation in the field of communication is also reflected by the creation of a Commission working group on this matter. The group is a direct result of the 2005 “Action Plan to improve communicating Europe”. According to action 17 the mandate of the working group clearly is “to enhance the evaluation activities in the field

⁴⁵ See

(http://ec.europa.eu/budget/library/documents/evaluation/guides/charte_eval_dg_comm_fr.pdf)

of communication⁴⁶.⁴⁶ (‘Action 17’ also calls for the implementation of a more centralised “specific function” to assess the impact of communication activities across DGs, which has however not happened so far due to a lack of resources).

The working group took up its work in March 2007 and is attended by officials from evaluation units of various DGs, although participation remains voluntary. Its main task has been described to us as two-fold: (1) It should be a forum for the exchange of good and best practice where knowledge about evaluation of communication activities can be shared across DGs. This is especially relevant concerning the challenge of assessing impact (and not just output) of communication. (2) The group should also provide guidance for future evaluations with the goal to develop a “tool-kit” that every DG can use. The (voluntary) use of a well-made tool-kit should in a first step lead to a better understanding among DGs about their different evaluation practices. Over time it should result in common evaluation standards.

The working group collects good and bad practices and will present recommendations in 2008. It is in contact with the ECN when its discussions are of direct relevance for communication units.

One point that should be mentioned about the vast majority of evaluations is their scope. In most cases evaluators were just asked to assess how efficient or effective the given action (programme, event, tool, etc.) has been in view of its general and specific objectives. It was hardly ever asked, however, to put the subject of the evaluation into a broader context and investigate how efficient it was in view of other – perhaps similar or even identical – activities going on in other DGs or services.

3.4.2 Feed-back into the policy process?

A second step beyond the mere execution of evaluations is the feed-back of the recommendations into the policy cycle. Again no common procedure exists across DGs, but the information from questionnaires has provided us with a large number of positive examples. The following (non-exhaustive) list is mostly taken directly from questionnaires:

DG AGRI

The main findings of the evaluation of DG AGRI’s communication policy have been included in a report to the European Council and the Parliament to bring them to develop “positive synergies between the EU and national communication strategies.”⁴⁷ The evaluation report was also submitted to the DGs concerned and to the Court of Auditors, and it was published on DG AGRI’s website. According to the established practice of DG AGRI, a follow-up note will be established 2 years after the finalisation of the evaluation study.

⁴⁶ See Annex, action 17,

(http://ec.europa.eu/DGs/communication/pdf/communication_annex_en.pdf)

⁴⁷ The objectives and the general information measures relating to the common agricultural policy are based on Council Regulation (EC) No 814/2000 which defines the objectives of the inform.

DG COMM

In the past, there has not been a systematic approach, but results of some evaluations, such as the internal evaluation of the "Grands Centres", have been used in taking decisions about the continuation or discontinuation of the intervention. Evaluations have helped for instance to adjust content and format of the tools (publications, internet). They are also used in order to identify areas for increased promotional activities and to adapt writing, style and language. Examples for such adaptations are publications ("Europe and you 2006"), the text for the DGs homepage or titles put on EUtube. Following the evaluation of the Europe Direct Contact Centre, plans will be included in the AMP for the promotion of all products. This concerns also the allocation of resources.

The DGs evaluation charter, approved in September 2006, foresees a systematic mechanism for ensuring the follow up of recommendations arising from evaluations, but the first case where this mechanism will be applied will only be by the end of 2007. It foresees that the unit concerned will be consulted on how the recommendations of the evaluation are going to be taken into account. Six months after measures for improvement have been agreed, the evaluation unit will check whether they have been implemented. The Director General will be informed about the situation. Moreover, the evaluation unit and DG COMM's internal evaluation network will produce an annual report concerning the implementation and follow-up of evaluation activities.

DG EAC

After each external evaluation an action plan is established and adopted by the Directors' Board and monitored by the coordination unit. This has happened, for example, concerning the revamping of the websites, which is now in its final stages. The evaluation of the visits centre has led to an action plan that is based mainly on the recommendations given in the evaluation. Concrete actions are supposed to be implemented in the short run within the framework of a new strengthened and proactive strategy laid out in DG EAC's communication strategy.

DG ECHO

The evaluation of the DGs grant facility came to the conclusion that flexibility and Commission visibility could not be ensured, which led to the decision to abandon the grant facility in favour of direct information contracts using procurement procedures. A current evaluation study on visibility funding of humanitarian partners should lead to the development of a toolbox to help partners undertake more effective communication actions linked to operational humanitarian financing agreements.

DG EMPL

Based on the main recommendations of a readership survey, a thorough redesign of EMPL's magazine "Social Agenda" took place. The same was done for the DGs Europa-website after an on-line survey.

DG ELARG

The DG is in the process of launching an evaluation of journalists' visits that shall be used to adjust how this activity will be handled in the future. There is also a contractual clause since the end of 2006 which states that all outsourced activities of the DGs main

contractor need to include an ex-post evaluation. Accordingly great care has been paid to indicate clearly the expected results of every given activity at the outset of the contract.

DG ENTR

The evaluation on communication links with SME-stakeholders states that at the end of 2006 a comprehensive communication and promotion plan will be prepared to guide DG ENTR's actions in this area.

DG ENV

The DGs campaign on climate change was subject to extensive quantitative and qualitative data collection in order to assess the impact of the campaign and learn for future campaigns.

DG FISH

Evaluation results have been used to decide whether to continue or discontinue certain activities. For example, the participation in the "European Seafood" professional fair was continued following good results of direct communication activity developed over two editions of the fair. Also the publication of the DGs magazine in a printed form was continued following results of a readership survey indicating that most readers had a preference for the printed over the electronic format. More resources have been devoted to media relations as a result of increased coverage of fisheries and maritime affairs issues indicated by the daily monitoring of media.

DG INFSO

Evaluation is central to adjust the DGs communication strategy. It is also a means to get approval from the hierarchy for the continuation/discontinuation of actions. The print publication evaluations have allowed the unit to present recommendations to the DG and to increasingly adopt web communication. Following evaluation of the ICT Prize, it was decided to discontinue it. On the basis of the previous evaluation of the IST event, the DG managed to considerably increase the cost-effectiveness and the relevance of the event in 2006, in spite of the fees required. Following the evaluation conducted after the latest event in 2006, it was decided to make the event coincide with the research work programme (i.e. bi-annual instead of annual). The concept of the 2008 event will be designed on the basis of recommendations made in the evaluation.

DG JRC

A particular focus is given to media actions: Annual targets are fixed, results are closely monitored and geographical, qualitative and quantitative analyses are made on a monthly basis with more detailed half-year and yearly reports also produced. This allows JRC to re-focus efforts on particular countries, institutes or themes during the remainder of the year. As a follow-up to an ex-ante evaluation, special communication training courses and message development sessions for JRC staff have been prepared. The JRC newsletter has been stopped, as the evaluation showed that there was such a small feedback rate that the resources put into this project did not justify it. A similar service will be taken up in the near future, but with minimum maintenance due to new technology.

DG MARKT

The positive evaluation of the Citizens' Signpost Service (CSS) supported its continuation. Ideas put forward in the evaluation for the future development of the service (e.g. developing contracts with related services and intermediaries) were included in the new contract.

DG REGIO

The entire communication policy of the DG is under a permanently evaluation contract. Among others this has led to the improvement of the DG's website, events and to the definition of the DG REGIO's linguistic policy. For example it has shown the DG that there is a demand for its monthly newsletter in all languages.

DG RESEARCH

The results of the comprehensive external evaluation of the DG's communication activities were discussed with the Directors and DG RTD's communication board. An immediate result has been the establishment of an internal communication group ('CRIG group') to improve coordination and streamlining.

DG TRADE

The conclusions and recommendations of the evaluation of the Civil Society Dialogue were discussed within DG Trade and with civil society to agree on how to take it forward. An action plan has been set up and it is foreseen to regularly review the implementation of the action plan with civil society.

DG TREN

In 2006 there was an internal communication policy audit which covered all communication activities of the DG. The audit concentrated on the organization and resources of communication activities in DG TREN and the selection of communication tools, mainly comparing the situation to other DGs. This internal audit provided ten recommendations, five of high importance, five of importance. Out of the 10 recommendations, most of them have been fully completed.

4. Communication Support Services⁵²

The main objective of central services from an institutional perspective is to help the Commission communicate better and cheaper. This can be achieved in principle by centralising the development and provision of those tools, resources and expertise, which are sufficiently generic as to work for DGs with different missions. Performance of these different support functions depends not only on the characteristics of the support DGs themselves, but also on a functioning system of internal communication between the provider and the client. Different DGs may request different types of services, so that the relationship between a line-DG and a support service may vary legitimately given different mission objectives at DG levels. However, given that provider and client are part of the same organisation, the question also arises whether the human and financial resources are distributed according to real operational needs and with a view to increasing overall institutional efficiency.

4.1 Allocating and Managing Functions and Resources

It is clear from the responses in the interviews and within the questionnaire that some central support functions are highly appreciated by DGs. However, they are often in short supply, thus leading to unacceptably long response times and/or compromises in quality (e.g. when texts are divided up and send out to external translators to decrease the response time, this sometimes raises problems of coherence and quality with the end product). Resources within the support DGs are often stretched, particularly in DGT, but also in SCIC, OPOCE and DG COMM, and to a lesser degree in DIGIT. Line-DGs have responded to the gap between the services needed and those that are available by two means: building up their own communication resources and tools and - where this is not cost-effective or possible - by external contracting. We will deal with both responses in more detail further below, but will first concentrate on investigating the three main ways of dealing with the problematic allocation of scarce resources between central DGs and line DGs.

The first is to *establish objective and justifiable priorities* for who is being served first and under what circumstances. These priorities can be derived from a combination of legal obligations and political considerations. DGT, for instance, must set certain priorities due to its workload, with the result that 60 percent of its staff working time is taken up by ‘core work’ (translation of texts that contain legal obligations or special types of documents such as Green and White Papers). The priorities for dealing with other types of documents that make up the other 40 percent of DGT staff working time are however less transparent. DG COMM has started to prioritise the support for the ‘priority project teams’ and those DGs communicating on the priority objectives. SCIC, which is generally praised for its professional and cost-efficient services, currently serves customers on a first-come first-served-basis. Concretely, this can mean that it agrees on one day to organise an event for 500 people, but has to refuse the next day to organise an event with 5,000 people, although the latter would only have required

⁵² In the context of this study, we count the following as ‘communication support services’ (or ‘central services’): DG COMM, DGT, DIGIT, SCIC and OPOCE. DG COMM certainly also has important coordinating and strategic functions that reach beyond the role of a support service and so does DGT in view of the promotion of multilingualism.

marginally more resources. We found a general lack of clarity about the priorities for allocating resources to non-core priorities and not sufficient information about these criteria and the time required to deal with certain requests.

The second way of dealing with scarce resources is to *institute a price mechanism* to mediate between supply and demand. Central support DGs would be rewarded for attracting business from line-DGs and allowed to expand their resources with the additional ones ‘earned’. Conversely, they would have to reduce their own resources when they fail to attract business from line-DGs. On the demand side, line-DGs would be rewarded in terms of saving on their resources for outsourcing those functions which central services can deliver better and/or more cheaply. This logic is at the heart of the UK model where the Central Office of Information (COI)⁵³ depends for each budget on ‘business’ from ministries and has therefore a strong incentive to service its ‘clients’ well. Conversely, ministries and agencies have an incentive to use their resources efficiently and will only go the COI for business, if they believe they will get better quality and/or a more attractive price. Given that needs and objectives of departments vary also in the UK, the kind of services requested from the COI varies as well. However, this kind of mechanism does not yet exist in the Commission, although line-DGs demand a “capitalist not a communist system” (as it was put by one interviewee) of allocating services.

The third way of dealing with scarce resource within a given institution is to investigate whether this scarcity is unavoidable or could be alleviated by *re-allocating or shifting resources between sectoral and central services* and thereby realise economies of scale and avoid duplication of tasks. We have found a wide-spread lack of trust that service providers will deliver in time and what is needed. As a result of long-response times and sometimes also dissatisfaction with the services and products offered by support DGs in the past, line DGs have developed over time and to varying degrees their in-house support services. These range from programme-developers, to web-designers and online editors to DTP specialists and proof-readers.

Sectoral DGs argue that presentation and expertise often cannot be separated and that therefore duplication of staff roles is unavoidable for reasons of good functioning of the DGs’ communication policy. This question is clearly one of degree. While each DG may have a good reason to have one web-master, there is no convincing rationale why they should have a much larger number as some do, if - and that is the big ‘if’ – central service are able to respond quickly and can develop systems, solutions and products tailored to DGs’ needs. It is clear that not all specialised human resources in the area of communication at the DG-level are indispensable at all times from the perspective of meeting the Commission’s and the DGs’ priority communication objectives. There is also an element of path-dependency and the usual logic of bureaucratic politics: Once a DG has managed to attract human resources for a particular task, for instance, webmasters, there is usually a strong institutional and social incentive in finding new tasks to keep these resources where they are and provide job security.

⁵³ See <http://www.coi.gov.uk/>

Central services should be able to deliver better and more customised services, if they were given resources from line DGs. This could either be permanently to realise efficiency-gains or for a limited period to complete a particular project or product for a line-DG that requires policy or DG-specific expertise. However, while loaning staff temporarily to other DG is legally possible, there is currently little incentive for DGs to share human resources (for a limited time and purpose) with central services or indeed with other DGs. The inflexibility of moving staff with communication expertise between DGs is a major cause of inefficiencies as noted by earlier studies.⁵⁴ This means that line-DGs lose opportunities to improve the professionalism and speed of central services that they in principle welcome and demand, while the service-DGs lose out on resources for the development of better customised products and on in-depth knowledge about what their customers want. This concerns particularly the issue of developing IT solutions and a common content management system for Commission websites.

Another underlying cause for the inflexibility is a lack of overall institutional awareness about staff's expertise and its level of specialisation. In the Commission there is very limited quantitative break-down for the whole of the institution concerning the very diverse professional groups, which are currently lumped together as 'communication professionals'. This is in part due to rather ad-hoc job-descriptions and the evolution of professional roles resulting from learning on the job and self-training. The consequence, however, is that as long as there is no organisation-wide awareness of the expertise of staff there is not a sufficient basis for judging whether staff with certain generic areas of expertise (event management, web-design/programming, DTP, print and online writing/editing, marketing etc) can be easily transferred from line-DGs to central services.

The situation in the Commission contrasts with the one in the UK government where the level of differentiation of professional roles is higher and institutional awareness of communication specialisation was fostered through the relatively new 'Government Communication Network' (GCN).⁵⁵ Moreover, there are incentives for ministries and agencies to shift some of their resources that are not needed to the Central Office of Information (for instance publications teams in the case of the HM Revenue and Customs) and use the savings to hire fewer and more senior staff in strategic areas. The COI in turn has then realised efficiency gains through an assessment of the numbers and skills of staff needed in relation to the necessary tasks and ultimately keeping only half of them.

At the level of non-staff resources, we found that a number of DGs have built-up or have access to resources that could be very valuable to other DGs as well: for instance repositories of images, graphics, video and data of different kinds, mailing lists, contacts to different kinds of media and information about the performance of external contractors. There is currently no Commission-wide mechanism or facility available

⁵⁴ Michael Brüggemann, Julia De Clerck-Sachsse, and Sebastian Kurpas, *Towards communication? Evaluating the activities of the European Commission in the field of communication*, Brussels: Centre for European Policy Studies, 2006.

⁵⁵ The GCN was created in 2004 in the context of a major reform following the so-called 'Phillis Review'.

that would enable a Head of Communication Unit in one DG to access, search and use these tools for his/her purposes free of charge. There is also no co-ordination mechanism available that would avoid duplication in the development of such tools. This limits economies of scale, as such coordination could clearly be offered through a centralised access point. In the case of the UK, the COI provides access to a much broader set of central services and tools than DG COMM, while the Government Communication Network specialises in providing access to communication expertise and databases with examples of best practices. We noted, however, that there are attempts of DG COMM to expand its services in this area.

4.2 External Contracting

As outlined above, long response times and the kind of services offered by communication support services often mean that DGs turn to external contractors, especially for printing and translation, but sometimes also for communication campaigns. While one cannot assume that central services will always be in the position to provide all communication support services needed by DGs, it can be expected that services are generally attractive enough for line-DGs to use. When line-DGs go outside instead this means incurring additional costs to the institutions as a whole, because human resources are needed for tendering procedures or for monitoring external contractors. The DG in question is also likely to pay more, since it cannot make use of combined ‘buyer-power’ of the Commission as whole. This is particularly important when buying advertising space, but also when ensuring cheap printing or reaching the overall volume to attract more capable external contractors.

This problem is compounded by the fact that current procurement and performance monitoring practices do not always produce high-quality and cost-efficient services from the private market of public relations consultancies, either. Throughout our interviews we were confronted with the same set of complaints. Tendering procedures are very time-consuming, especially when they are done at the DG-level by personnel with a lack of relevant expertise in tendering and marketing. DGs often find it difficult to formulate tenders in a way that enables them to select proposals on the basis of quality rather than on overall price alone. Moreover, the same four to five Brussels-based ‘usual suspects’ tend to apply to calls, because the procedures and demands are so complex and heavy for potential bidders and because the overall financial volume is comparatively small. Some of these firms belong to the same mother company and staff is then sometimes just shifted from one firm to another, depending on successful tenders. The long history of awarding contracts to this small circle of medium-sized firms means also that larger and more professional consultancies also factor-in the reputational costs arising from losing a bid against a smaller firm – and therefore do not apply. Given that the remaining firms bidding for contracts often specialise in particular areas, an open call may lead to only one or two viable options for the Commission. The combination of these different factors means that competition and performance control are often effectively short-circuited.

At the level of implementation, a large number of DGs again complained about the resource intensity of monitoring external contractors and the problems with the quality of their services. Publications and translation work sometimes has to be re-done within DGs, as they do not find it not up to expectations, thus creating substantial waste of

resources. At the same time, there is not yet an effective system of imposing sanctions on contractors for insufficient quality, except for the worst case scenario of complete failure. Exchanging information about contractors is currently at best informal and at worst not taking place at all, since DGs are not keen on exposing such problems for fear of being blamed for them.

4.3 DG COMM

DG COMM has a strategic and coordinating role for ‘corporate’ communication, but it is also a central communication support service for virtually all DGs, according to the responses we received through the questionnaire and interviews. It offers access to diverse services such as public opinion analysis and media monitoring, Europe by Satellite (EbS) and related production, the audiovisual service for the production of video material, interactive websites (e.g. Debate Europe, EUtube, blogs). DG COMM is also the headquarters for the Representations, which are increasingly valued by DGs for their support for media relations, monitoring and organization of events and other communication activities in Member states. DG COMM is also the administrative host of the Spokesperson’s Service (SPP), which is a central access point to the College and the political news agenda in general. Finally, DG COMM has an informal role in making sure that the Commission as a whole has the support services it needs. It consults with other support services, in particular OPOCE, to make sure that DGs are aware of the services on offer and that they make best use of them. In order to provide a better overview of the services available and support DGs in developing their annual communication plans, DG COMM has recently developed ‘the catalogue’, a list of tools and services, mostly provided by DG COMM. ‘The catalogue’ is meant to be used more specifically to support priority project teams.

As a first approach to evaluating whether available services are sufficient, we compare the list of services to those made available by COI in the UK.⁵⁶ One can note, for instance, that DG COMM does not offer what is termed in the UK case ‘interruptive media’: direct and relationship marketing, media and advertising services, sponsorship and digital marketing, for instance through SMS. This reflects arguably the Commission-wide ambivalence regarding the use of such communication tools in an EU-context and the question whether attitude change is a legitimate communication objective for the Commission. The second difference concerns human resources and development. The COI offers support to other government departments and agencies in recruiting specialist communications staff in co-operation and compliance with standards of the Cabinet Office’s Government Communication Network (GCN). This includes recruitment advertising, response handling and preliminary quality checks of applicants. Training and skills development are in addition provided by the GCN. The difference to the Commission reflects at least in part that DG COMM has had no role in the DGs’ recruitment of staff to communication positions until now. The culture of involving communication experts (from DG COMM or other communication units) in the recruitment process is not strongly developed yet, although such involvement does occur among some DGs. There has also not been a substantial drive throughout the

⁵⁶ See <http://www.coi.gov.uk/services.php>.

Commission to recruit external communication professionals other than through the highly standardised and long-winded process of the concours. (As mentioned under point 3.3.3, a first AD-5 level concours is currently ongoing.)

Interviews and questionnaires showed that the views of line DGs on services from DG COMM vary. Different DGs request different types of services depending on their particular objectives, target audiences and resources. A few services are mentioned most frequently as particularly important to the work of DGs. On top of the list comes the centralised provision of framework contracts for all kinds of communication services. There is substantial duplication of contracts for certain functions, such as the management of mailing throughout the Commission and DGs look for a ‘one-stop-shop’ for easy access to reliable contractors. Many DGs feel that setting up framework contracts is a highly labour- and expertise-intensive work that is best done centrally. A centralised approach to the provision of such contracts would also ease transparency and enforcement problems about the performance of contractors (see also section 4.2). If co-ordinated well, such a centralisation would also offer opportunities for promising potential bidders higher volumes and thus raise the interest among potential applicants beyond the circle of ‘the usual suspects’. DG COMM has already some framework contracts in place and is moving in the direction of setting up high-volume integrated ones.

Services that were also considered very important are media monitoring, EbS and audiovisual communication more broadly. In this last area, DGs noted that the Commission needed to match its excellent contacts to the written press with a similarly well developed approach to knowing and approaching the relevant television editors in Brussels as well as in member states. This underpins trends among a number of DGs to ‘go visual’ with regards to tools aimed at the general public. Another important area for support is the development of a corporate content management system, which is covered as a separate point further below.

We have found it extremely difficult to measure satisfaction of DGs with regard to these services. Most interviewees noted an upward trend with regard to the quality and responsiveness. Generally, the impression was that the speed of response was not the main issue (except for audiovisual material), but rather the kinds and range of specialised services available, for instance, particular types of evaluation strategies and marketing tools. Heads of Unit also noted that they were looking for a ‘one-stop-shop’ for specialised expertise to deal with particular issues and criticised that DG COMM had not been able so far to staff all its services with sufficiently experienced and skilled communication professionals. In this context it must be noted, however, that DG COMM has to overcome the negative reputation of the former DG 10 with regard to the quality of services and it is only slowly building up trust among DGs that it can deliver the right service in time. As services improve in range and quality, take-up among DGs is likely to rise, which will reduce duplication and allow for efficiency gains.

4.4 OPOCE

OPOCE offers publication services in the ‘broadest sense of the word’ to EU institutions and agencies. The Commission accounts for 74% of the financial volume of

OPOCE's business, while EP and Council account for about 8 percent each.⁵⁷ OPOCE activities can be divided into two main areas. First, there are general publications where the author service chooses one or all of the associated service functions (graphic design, proofreading, printing, copy-right management, mailing list management and distribution etc). The second main area of activity covers databases and publications managed directly by OPOCE. These include the Official Journal (OJ) and the EUR-Lex database, public procurement notices in the supplement of the OJ and the TED database, the Cordis database and publications for the research community, and finally the EU bookshop, which currently provides free of-charge online access to PDF-documents of all new OPOCE publications as well as facilities for ordering hard-copies. One indicator of the use of the databases are unique visits, which amount to 46 million for EUR-Lex, 6.68 million for TED and 47 million for Cordis.

With regard to publications, both hard-copy and multimedia, the overall volume for the Commission for 2006 is 7,500 titles in total, costing around €4.5 million. The total cost of publications including diffusion adds up to €39.1 million plus the Official Journal estimated as at €7.9 million. A breakdown by line-DG (excluding DG COMM as the by far largest client) reveals quite substantial differences in the use of OPOCE across the Commission: DG EMPL and DG RTD were spending most with €6 and 6.2 million respectively while some DGs such as FISH, SANCO, TRADE hardly made use of OPOCE for their print publications. We can also note that a substantial number of DGs do not use OPOCE multimedia publications at all. For those who do, the proportion of general publications to multimedia publications varies massively. These differences in the use of OPOCE were also reflected in the responses to the questionnaire where only about a third of DGs listed OPOCE as an important internal support service.

Table 10. Use of OPOCE across DGs

	General publications	Multimedia (incl. video, presentations)	Total in €
DG – Agriculture and Rural Development	334,318		334,318
DG – Budget	104,705		104,705
DG – Communication	1,819,097	970,140	2,789,237
DG – Competition	104,903		104,903
DG – Development	256,851	10,134	266,984
DG – Economic & Financial Affairs	523,491	1,241	524,732
DG – Education and Culture	133,692		133,692
DG – Employment, Social Affairs and Equal Opportunities	755,820		755,820
DG – Energy and Transport	155,307	18,887	174,194
DG – Enlargement	27,894	158,094	185,988
DG – Enterprise and Industry	505,786	8,285	514,071
DG – Environment	345,088	11,557	356,645

⁵⁷ Note from OPOCE for the attention of C. Day, Secretary General, L. Romero Requena, DG BUDG, C. Chene, DG ADMIN of 12 September 2007: Screening of the Commission Human resources in the field of communication.

DG – External Relations	144,690	241,935	386,626
DG – Fisheries and Maritime Affairs	29,194		29,194
DG – Health and Consumer Protection	32,972		32,972
DG – Humanitarian Aid	76,888		76,888
DG – Informatics		2,649	2,649
DG – Information Society and Media	152,857	81,549	234,406
DG – Internal Market and Services	175,600	40,009	215,609
DG – Interpretation	4,461		4,461
DG – Justice, Freedom and Security	20,219		20,219
DG – Personnel And Administration	301	35,019	35,320
DG – Regional Policy	318,169		318,169
DG – Research	801,727	311,295	1,113,022
DG – Taxation and Customs Union	6,202		6,202
DG – Trade	38,585		38,585
DG – Translation			0
BEPA	1,303		1,303
Secretariat General	271,776	9,157	280,933
EuropeAid Co-operation Office	53,040	94,639	147,679
EUROSTAT	285,367	42,609	327,976
Joint Research Centre (DG)	15,473	50,090	65,563
Joint Research Centre - Geel			0
Joint Research Centre - Ispra	88,910		88,910
European Commission	1,177		1,177
Sum:	7,585,863	2,087,290	9,673,153

Source: OPOCE 2007.

Of these general and non-compulsory publications, 85 percent are distributed free of charge (based on 2005-2007). Even for the 15 percent of publications which are priced, line-DGs often decide to distribute a considerable number of copies free of charge, thus compromising the sales potential. Pricing publications is an effective way of measuring their impact. It also enhances their attractiveness to regular bookshops and thereby widens the distributive reach of publications.⁵⁸ This is why OPOCE is quite keen on pricing publications, but notes that in the period of 2002-2004 the volume and revenue from publications has actually decreased. The reason is that DGs usually prefer free publications because it is easier to administer. According to our interviews, DGs are not keen on the revenues from publications, because they create problems of accountancy. Pricing publications also risks exposing the true demand for publications, which may turn out to be so low that a given publication appears not to have been justified (see also Chapter 3 for communication tools on this problem).

OPOCE is trying to shift DGs in their publication planning from a ‘push’ to ‘pull’-mentality, trying to raise awareness about the need to specify more clearly why a certain type of audience may actually WANT to read a given publication (see also Publication Guidelines 2005). It does not have the power to bloc a given publication, however, and can only advise and educate. While the interviews with DGs suggest that this education mission is bearing some fruits, it is fair to assume that a significant number of publications is still printed without a clear identification of market needs or clearly

⁵⁸ DG COMM supports sale of some publications and works with OPOCE to identify them.

defined objectives. This has led not only to resources of DGs and OPOCE wasted on largely ineffective communications tools, but also to storage costs due to overprinting. More important than the costs of storing articles (€500,000 for OPOCE alone, not counting the storing costs at Representation-level) is the sheer number of articles stored: 32.000 titles with 33 million copies according to figures provided by OPOCE. These figures indicate that the costs for authoring, lay-outing and proofreading a number of these titles have not been very well invested.

The second dimension of rationalisation through OPOCE concerns the preplanning of publications, which are then put into an annual publication plan (PoP). This should in theory allow OPOCE to plan ahead for its internal resource allocation. The problem is that only half of the publications that are pre-announced are actually realised by the DGs themselves while at the same time many new ones are added intermittently. This severely limits the usefulness of the planning process. One key problem in the area of publications has been that DGs did not have a proper internal planning process or communication strategy in place, which would provide stability to plans. This made them vulnerable to relatively sudden demands from within the DGs for a publication on varying topics and unnecessarily slows down the production process, leading to delays in response and further external contracting. Vice-versa, DGs have told us that they find the PoP process not very adapted to their needs and overly bureaucratic.

This raises the broader issues of client-focus and service quality: While respondents from line DGs do note a marked improvement in the services offered by OPOCE in recent years (praising in particular the liaison contact for each DG and applications like OPSERV and the EU bookshop), they also criticise the heavy and at times unclear procedures, the long response times both in terms of access to staff and time to deliver a product. To quote from a questionnaire: *“For printing reports during the summer period, we have experienced delays of several weeks. These delays were service related and basically boiled down to difficulties in reaching (or getting responses from) the responsible staff. Also, with regard to clear procedures, when filling out on-line applications for printing publications, each parameter should be clearly specified”*. An evaluation study of OPOCE’s non-compulsory publications concluded that complicated internal communication hindered optimal interfacing with clients, while the clients were not sufficiently aware of the services that existed and how to best access them in terms of procedures and tools.

DGs generally assess the quality of services as very good, but note particular bottlenecks with regard to the production of non-standard publication, which require specialist expertise such as graphic design, but also in areas such as proofreading. A respondent to the questionnaire stated that *“at certain busy times of the year, the mounting backlog of proofreading work in key languages exceeds four months' work”*. As a result many DGs go to external contractors or use the OiB print shop for a quicker response and smaller scale print-runs. OPOCE is currently addressing some of the shortcomings through its Action Plan 2005-2007, for instance in the area of integrated publishing services, marketing, promotion, joint-publishing and the EU-Bookshop.

Finally, OPOCE provides other DGs with access to framework contracts for various publishing activities. At any one time there are around 250 such contracts available to

EU institutions and agencies. This is a service very much appreciated by DGs given the time it takes to set-up a framework contract.

4.5 The Case of the Webplatform/ Corporate Content Management System

Rather than focusing on DIGIT as such, we want to explore in the following briefly the interplay of DIGIT, DG COMM and line-DGs with regard to the development of a corporate content management system for web-publishing (CCMS). It was mentioned frequently in the interviews as a case of disappointed expectations and can reveal broader issues of how the Commission tackles large projects aimed at rationalising resources. It should be emphasised, however, that a growing number of DGs now use the CCMS, indicating that the future trajectory of the system may be better than its past evolution.

The starting point in 2002 was the realisation in DG COMM that every DGs website looked different in terms of design and logo, contained different information and worked in a different way. Developing a common webplatform and shared content management system offers the potential for efficiency savings (design, programming), added functionality, including multilingualism, easier access for stakeholders and citizens to information and means of interaction as well as a higher visibility of the EU as a whole. Citizens would be more likely to perceive the DGs as players in a common team with a clear common identity, mission and voice, as expressed in a uniform logo and layout of the various websites.

Despite this strong rationale for change and the initial support for the project across the Commission, a number of things went wrong. First, the process from tendering to the availability of the actual product took much longer than expected. Some DGs were told to wait with their own developments until the product was available, leaving them with outdated systems for a long period. When the product was finally available, a number of DGs declared it was not fit for (their) purpose and that they would continue to develop their own systems. While there is a continuing argument about whether or not the product is generally unsuitable for some DGs, or whether they have just not invested the time to understand how to use it, the consequences have been challenging the trust of DGs in the ability of central service DGs to deliver.

On the basis of the interviews, a number of factors are relevant to this outcome: A lack of understanding about the sheer scale and complexity of the project on the part of DG COMM and DIGIT. Product specifications that did not fully reflect what (some) DGs needed or wanted. A lack of resources in Central Services (not necessarily overall) when it came to customising the only available product on the market, which led to long delays, and deficiencies in the consultation and dialogue between central services and the relevant people within DGs about their requirements and the different stages of the project, including the requirements for training. Finally, there was a lack of high management involvement in developing, leading and resourcing the project until the beginning of 2007, when a group of Director Generals led by DG COMM and DIGIT started to oversee the project. To our knowledge there was no added political or financial traction through linking the reforms to the ‘i2010: e-government action plan’. Instead it was seen as a purely technical project within many DGs. Although the

problem has been identified, there are great doubts that a collective decision-making mechanism without a top-down arbitrator can deliver a solution.

The later point becomes particularly visible when comparing the Commission's approach with a member state. An interesting comparison is the UK Transformational Government programme, which aims to better use technology to transform government as a whole. It was led with announcements from the top with the Prime Minister outlining the strategy in a speech. One part of this broader six-year strategy has been to reduce the number of websites run by departments and to migrate and converge content to the Directgov (for citizens) and Business Link-platforms (for commercial stakeholders). To date, 550 governmental websites have been switched off and Directgov receives over 2.1 million visits a month (i.e. 25.2 million/year). It has been used to provide campaign support to six government campaigns (for the Department for Education and Skills, the Driver and Vehicle Licensing Agency, and the Department for Work and Pensions) with advertising spend of approximately £10 million. While we were unable to ascertain overall figures for the programme, it did involve the creation of several new posts and structures such as a Common Infrastructure Board, a Service Design Authority and a Service Transformation Board. Implementation was divided into various work streams with the initial implementation phase concerning the migration of content to be completed within three years.⁵⁹

⁵⁹ See http://www.cio.gov.uk/documents/pdf/transgov/HMGovPosterFront_Draft3.pdf.

5. The Commission's Representations in the member states

This chapter analyses the role of the Representations of the European Commission in external communication. The Representations play a key role in communicating with national publics, as they are best placed to adapt central messages from Brussels to the information needs and interests of national audiences. They are in a better position than the headquarters in Brussels to keep in touch with national governments, journalists on national and regional level, local civil society – and with citizens. This makes the Representations a central ‘transmission belt’ for EU communication. They can translate EU communication into national context and culture and transmit input from the local level back to Brussels.

In Chapter 2 the Representations have already been discussed with respect to vertical coordination of communication activities between the different DGs and the Representations. Beyond this, however, this study is also meant to provide a basis for assessing the added value of the so-called ‘pilot Representations’. The more general question behind this is the quest for the right fit between human and operational resources, communication structures and aims of communication. It relates to the terms of reference of this study, which ask for lessons for an improved cost-benefit ratio of communication activities, a more efficient allocation of resources and the avoidance of gaps and overlaps in the activities of the Representations.

These issues will be tackled by (1) analysing the changing context, mandate and resources of the Representations. (2) In a second step, the study will move on to the work and resources of individual Representations in order to determine the added value of the pilot project. This will be done (a) by looking at changes in the work of the Representations that are participating in the pilot project and (b) by comparing pilot and non-pilot Representations. The comparison also reveals (3) a number of common challenges across all Representations. (4) Recommendations for the future management of the Representations and for the future of the pilot project, which are based on the main findings of this chapter can be found under point 5 of the summary report at the beginning of this study. .

5.1. The changing context, mandate and resources of the Representations

The mandate of the Representations has been in constant evolution since 2001. With the start of the Commission of Romano Prodi, the Representations were asked to focus on media relations. Only shortly after, DG Press was founded and the Representations were put under the umbrella of this new DG. The transformation of the "Spokesperson Service" to "DG PRESS" in early 2001 had important consequences on resources. It led to the creation of functions which are indispensable for a Directorate-General (i.e. a directorate for resources, an internal audit capacity and different control functions necessary after the increase of the budget). However, this also led to absorption of human resources for tasks other than communication.

The mission of the new DG was henceforth extended to include communicating with the general public.⁶⁰ At the same time, the Commission developed “a new framework for co-operation” in the field of communication. This included the principle of decentralisation: The Commission’s communications should be adapted to the national setting by the Representations. In the following years, the Representations were charged with implementing a substantive part of the communication activities in the framework of different PRINCE campaigns, which were sub-delegated to them by the respective line-DGs. During the same period, the task of administering communication became much more labour-intensive with the introduction of the New Financial Regulation and the decentralisations of the financial circuit that came into force at the beginning of the year 2003. All of this was not systematically accompanied with additional or better qualified staff for the Representations. On the contrary, some Representations were losing staff and the successful implementation of communication, namely the PRINCE campaign on enlargement (in the EU-15) was severely compromised.⁶¹ The allocation of additional staff for the enlargement in 2004 was dedicated to the new EU-10 Representations. At first there was a very low allocation of staff to these Representations, but it was increased until 2007. Under Romano Prodi, also the mission of the Representations was extended, but they were not provided with the means and resources to live up to this mission.⁶²

The arrival of the Barroso Commission provided Margot Wallström with the opportunity to start a reform process that has generated the project of the ‘pilot Representations’, which is the focus of this chapter. In an interview with *EurActiv* Wallström commented on the state of paralysis of the Representations in 2005: “*Either we change the way they work and their priorities or we shouldn’t have them at all. We cannot continue like this when more than half of their time and more than half of the people in this DG are working on administrative matters.*”⁶³

The problem of a lack of human resources and administrative overwhelm due to the formulation and interpretation of budgetary rules clearly came to the fore in a survey that was conducted among 12 of the EU-15 Representations in 2005.⁶⁴ When asked “*whether the following items constitute major problems for implementing communication*” in 2005, 75 percent of respondents mentioned the new financial regulation and 59 percent mentioned that there is not enough staff. Both issues are related, as the staff is needed to execute the budget according to the new rules. It must

⁶⁰ Michael Brüggemann, “Europäische Öffentlichkeit durch Öffentlichkeitsarbeit? Die Informationspolitik der Europäischen Kommission.” Dissertation Manuscript. Department for Social Sciences, University of Hamburg, 2007, p. 113.

⁶¹ Michael Brüggemann, Julia De Clerck-Sachsse, and Sebastian Kurpas, “Towards communication? Evaluating the activities of the European Commission in the field of communication”. Brussels: Centre for European Policy Studies, 2006.

⁶² Brüggemann, 2007.

⁶³ *EurActiv*: Interview: Commissioner Wallström on the EU's Communication Strategy, 6 April 2005, at: <http://www.euractiv.com/en/infosociety/interview-commissioner-wallstrom-eu-communication-strategy/article-137597> (checked on 30.10.2007)

⁶⁴ Brüggemann, p. 217.

be said that in the meantime the Commission has taken a number of actions to address the problems that arose from the new financial regulation (e.g. a revision of the financial regulation⁶⁵ and its implementing rules⁶⁶). Interviews for this study however confirmed that rules are still sometimes perceived as burdensome. In 2005, operational budgets and human resources as well as aims and means of the Representations were clearly out of sync and only 8% of the Representations stated in the survey that they had a sufficient operational budget. The Commission's cure against these and other structural problems of the information and communication activities of the Commission was the 'Action Plan to improve communicating Europe'⁶⁷, which included the selective reinforcement of the human resources of eleven Representations and four regional antennas on the basis of their communication plans.

Posts for 25 AD-officials and 25 contractual agents were provided in order to execute the actions envisaged in the communication plans developed by the Representations that became 'pilot'. The reinforcement began in January 2006 and its first term will end at the end of 2007. In the framework of the Annual Policy Strategy (APS 2008) DG COMM received credits for the existing 25 contractual agent posts under the pilot scheme and for additional 25 contractual agents as a replacement of the 25 officials sent under the pilot scheme to Representations.

With the principles of 'better listening' and 'going local', the Action Plan also added responsibilities and tasks for the Representations:

- 'Listening' involved taking consultations from Brussels to the local level, a better analysis of national public opinion as well as improved reporting back to Brussels. Another additional task that the Representations took on in 2005 was the management of the 'Europe Direct' network of information points in the respective country. Political intelligence was further enforced as a task of the Representations.
- 'Going local' meant communicating more directly with the citizens by media work that reaches local media as well as events and discussions reaching out to the citizens and beyond the policy circles in capitals.

Thus, the mandate of the Representation was extended to its current format. This format was formally harmonized for all Representations only in 2006 and became operational with the Annual Management Plan 2007.

In the time before, Representations used to have widely varying mission statements. Now all "*Representations act as the official representative of the Commission in each Member State and serve the interests of the whole institution under the guidance of DG COMM*".⁶⁸ This statement clarifies the issue of whether the Representations are meant to work for line DGs: They are managed by DG COMM, but they serve the Commission as a whole. According to their new mandate, the Representations serve three purposes:

⁶⁵ Council Regulation 1995/2006, 13 December 2006.

⁶⁶ Commission Regulation 478/2007, 23 April 2007.

⁶⁷ SEC (2005) 985

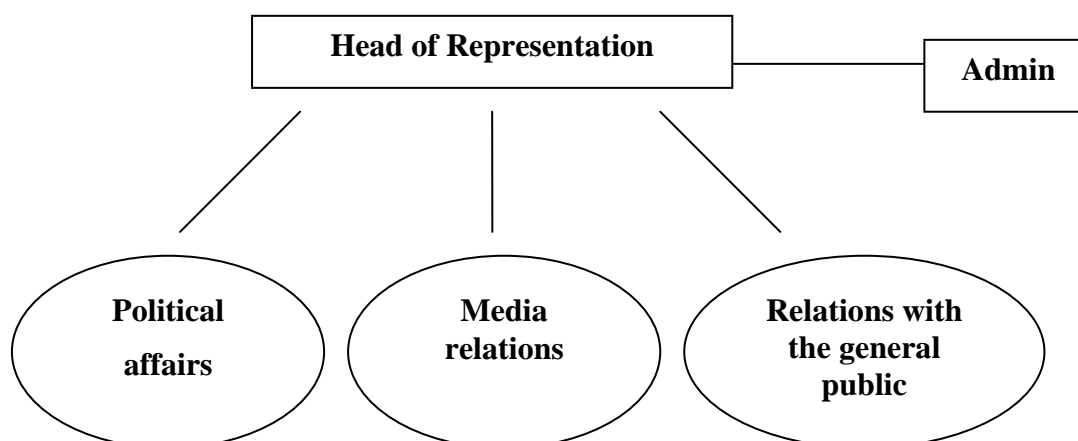
⁶⁸ See Annual Management Plan 2007 of DG COMM, Annex H.

1. **Communication to national publics** along the communication priorities on the Commission's agenda with additional focus on issues which are of interest in the respective national context
2. **Media relations and media monitoring**
3. Political intelligence / public affairs: **Political reporting** to the Commission, providing **information to the actors of national politics**, organising the **visits of Commissioners**

The following analysis will show if and how these functions are served better after the provision of additional personnel to the pilot Representations. Before, some more background information will be given on the resources and internal structures of the Representations.

According to interviewees in DG COMM, the internal structure of the Representations ideally follows the same lines as the formulation of their mission: The officials in a Representation should either deal with communication with the general public or with the media or serve as intermediators between the world of national politics and Brussels (see Figure 12 below). The Head of Representation oversees this and is supported on administrative matters by an official mainly dealing with administrative questions.

Figure 12. Organisational chart of a Representation along the model of DG COMM



Source: Figure developed on the basis of interviews conducted with officials from DG COMM.

Beyond these core officials, there is additional staff helping them to fulfil their tasks, but Representations vary greatly as far as the number of staff is concerned. Whether the Representations are able to fulfil the wide tasks ascribed to them, largely depends on what kind and how much staff there is to support the core officials. Also, not all Representations follow the structure outlined above. A streamlining is certainly desirable.

Table 11. Resources of the Representations and of HQ DG COMM in 2007

		AST												
		AD	ex-B	ex-C	ex-D	Nat Exp	Interim	AC	Loc Agt	Intra-mur	Trainee	Oth	Tot	%
HQ		144	97	111	5	3	7	43	0	63	2	5	480	44.1
REP	EU 12	36	18					141		5	2	2	204	
	EU 15	61	46	36	5			166	67	14	9	1	405	
	EU 27	97	64	36	5	0	0	307	67	19	11	3	609	55.9
Total		241	161	147	10	3	7	350	67	82	13	8	1089	

Source: Data provided by DG COMM.

Table 12. Execution of the Operational Budget of the Representations (commitment appropriations)

	2005	2006	2007
Operational Budget (€ million)	33.6	36.8	30.1 *

* Figure resulting from an extrapolation made on the basis of 2006's execution rate (= 96%)

Source: Data provided by DG COMM

As such, the data in Tables 11 and 12 do not reveal anything about the question whether resources are sufficient in order to fulfil the mission of the Representations. The fact that the budget of Representations has been shrinking between 2005 and 2007 is mainly due to the recentralisation of the administration of contracts for audiovisual co-productions (APCAV) from the Representations to the Headquarters in Brussels. We can already state, however, that an operational budget of about €30 million (commitment appropriations) for all Representations is modest. The figures for human resources reveal that many people are working in the Representations, but the proportion of officials (97 AD-officials if the pilot officials will be withdrawn) is rather low. Given that the Action Plan has further extended the mission of the Representations (and not only for those participating in the pilot project), the problem of a misfit of aims and means which was indicated above for the situation 'ante-Wallström' prevails. Expectations on how much impact the Representations can have on the general public in the member states should be rather modest given the resources available.

Table 13. Ratio of staff and budget of selected Representations (2006)

	D	FR	PL	NL	IT	ES	UK
Operational Budget (€ million)	4.6	3.9	0.5	1.5	4.9	3.5	1.5
AD-Officials	7	5	4	3	5	5	7
(+ pilot officials)	(+4)	(+3)	-	-	(+3)	(+2)	(+3)

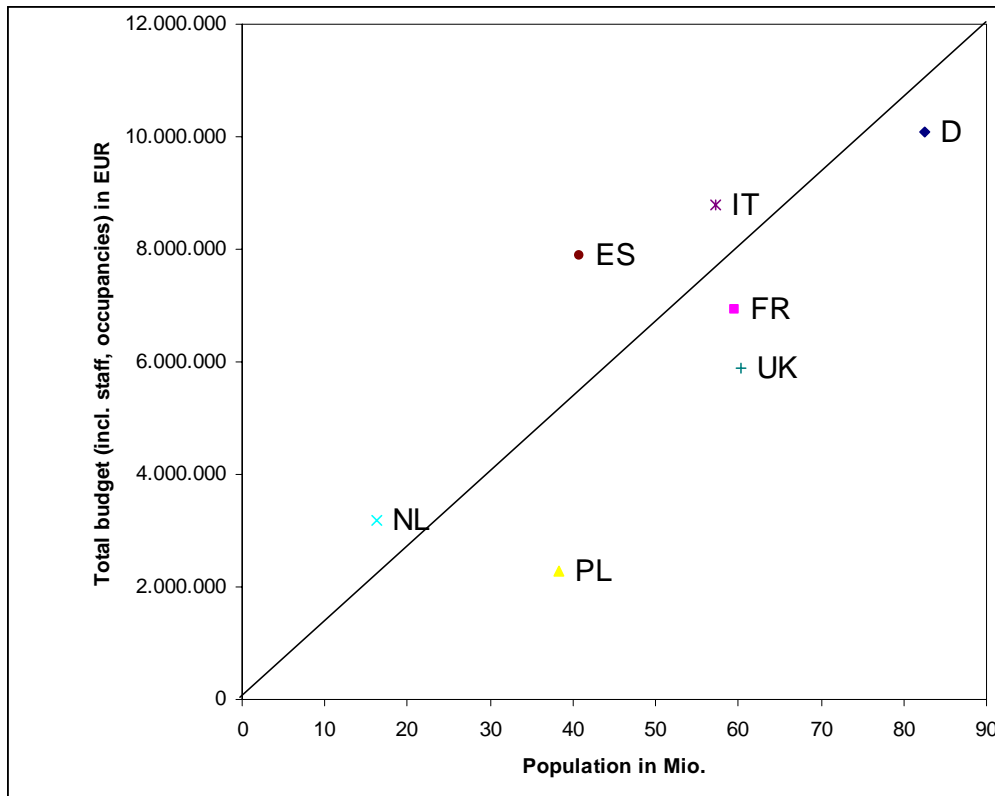
Source: Data provided by DG COMM.

Looking at the resources of selected Representations in Table 13, one can also observe several other imbalances: the ratio of staff/operational budget varies greatly, as well as the relation between the number of citizens to be informed and the staff and the budget of a Representation. This is striking when comparing the Representation in Germany

and in Italy as well as by comparing e.g. Poland and Spain. Germany has significantly more staff than Italy, since it is catering for 80 instead of 57 million people, but Rome has a bigger operational budget than Berlin. This can hardly be justified as an adaptation to national needs, as it is not evident why one would need more money to communicate with Italians than with Germans.

To take another example: Poland and Spain have roughly the same size in terms of population, but the Representation in Spain is much better resourced with both staff and budget. This becomes even more obvious when looking not only at AD-officials, but by looking at all resources combined (see Figure 13 below). Figure 13 reveals that the Representation in Poland is an extreme case with relatively weak resources for informing a relatively large population.

Figure 13. Ratio of resources (staff + budget) and population (2006)



Source: Calculations based on COBU Report 2007, European Parliament.

It thus appears that the size of the population meant to be informed is currently not sufficiently taken into account as a criterion for an equal distribution of resources among Representations. One has to keep in mind, however (as pointed out above), that the overall-level of staffing in the Representations is also rather modest. Representations in smaller countries also need a ‘critical mass’ of both budget and staff in order to deliver a minimum on the three core tasks outlined above. Otherwise there would be a considerable risk that these Representations will be mostly absorbed with self-

administration. If resource-neutrality is to be observed, additional communication staff would have to come from Brussels (see Chapter 2).

Allocating resources according to the size of the population is of course only a very rough first indicator to determine the appropriate size of the core staff and budget of the respective Representation. Representations perform their core functions (i.e. media relations, political reporting, and relations with the general public) in different environments which require adaptations to the priorities and ways of operating. They therefore have different needs in terms of what kind of skills and competences need reinforcement. Therefore, the specific needs of each Representation should form the basis on which headquarters decides what kind of staff should be sent where and what tasks should be performed by them.

Depending on communication priorities which touch some countries more than others in a given year and depending on the political situation (e.g. referendum on an EU-related issue, EU-presidency of the respective Member State) or other specific information needs, it could also be considered to enlarge staff of the Representations in a flexible way, i.e. as long as the reasons for allocating extra-personnel prevail (see also the section on ‘vertical coordination’ in Chapter 2). Before one could advocate a transfer of more personnel from Brussels to the Representations, however, it must be analysed whether more people also make better communication. Evaluating the pilot exercise can provide an answer to this question.

5.2. Evaluating the pilot exercise

In order to evaluate the pilot exercise, it is essential to identify what the pilot officials and contractual agents actually did. As a first step, we will look at their job descriptions. In surveys provided by DG COMM, the profile of the pilot staff was divided into three categories, which seem to go along with the three strands of the organisational chart presented above:

- political reporters responsible for political intelligence and public affairs,
- press officers responsible for media relations and
- task managers who are primarily managing information projects for the different publics.

Table 14. Distribution and general profile of the pilot staff (2006)

Distribution of the pilots across the different national Representations and antennas

	DE*	DK	EE	ES*	FR	HU	IE	IT*	PT	SL	UK
Officials	4	4		2	3	3	2	1	1	1	3
Contractual agents	4		3	3	3	3	2	1	1	3	3
Total	8	4	3	5	6	6	4	2	2	4	6

*Including pilot staff sent to the respective antennas in Munich, Bonn, Barcelona, and Milan.

Profile of the pilot staff

	Number of officials	Number of contractual agents	Percentage in total
Political reporter	4	2	12
Press officer	10	11	42
Task manager	11	12	46
Total	25	25	100

Source: Own elaboration.

Table 14 shows the overall distribution of pilot staff. As regards the content of their work, it should be stressed that pilot Representations were chosen on the basis of specific management plans linked to specific communication tasks. Pilot staff was assigned a key role in implementing the Action Plan and Plan D at the national level. Contrary to what some of the individual job descriptions of pilot staff suggest, we were told that it was indeed only used to reinforce the communication activities of the Representations. When looking at individual job descriptions, we found that ‘press officers’ did not only deal with ‘relations with the media’, but also with more general communication actions aimed at the general public. Similarly ‘political reporters’, provided political analysis to Brussels, but they also engaged with other communication-related tasks. The fact that the actual tasks of pilots did not always stick to their formal job description does not make their evaluation easier, but in practice it may have resulted in a more efficient use of staff.

Staff with the job title ‘task manager’ also covered a large variety of management tasks including ‘policy development’ (especially with respect to ‘going local’). Administrative tasks were however only carried out concerning their own communication projects. As no additional administrative staff was sent to assist the increased number of activities, pilot staff (officials and contractual agents) sometimes had to draft the tender specifications for their own (communication) activities.⁶⁹

In the following section the question will be addressed whether the pilot exercise really has provided *added value* to the external communication activities of the Representations. The ‘pilot-effect’ will be established by two comparisons:

- The first comparison is longitudinal, i.e. the question will be addressed ‘What has changed in the pilot Representations since the introduction of the additional staff?’
- In a second step, we will compare pilot and non pilot Representations in order to find out in whether and how their communication efforts differ.

Before we come to these two dimensions, however, we have to point to certain limits that we faced when evaluating the added value of the pilot representations.

5.2.1 Challenges and limits for the Evaluation of the Pilot Exercise

In the introduction, we differentiated between *output* (e.g. a press conference), *outgrowth* (e.g. the number of journalists that came to the press conference) and *impact* (e.g. increasing awareness of EU policies through more articles or articles of better quality being published) – all of which should have increased through the pilot exercise. However, especially outgrowth and impact were not continuously measured over the last years, which makes a reliable and structured comparison on these criteria between

⁶⁹ In a note dated 26 July 2005, the Director of the resource directorate in DG COMM had instructed the Heads of the pilot Representations that the pilot staff can by no means be used to reinforce the administrative team of the Representation by assigning administrative and financial tasks to them, except for drafting the technical part of tender specifications of their own activities. We were told that in some Representations this was a cause of complaint from other staff members who had to take on additional work generated by pilot staff.

the activities in different pilot and non-pilot Representations impossible. Also output was measured in a way that makes a direct comparison difficult. The reporting system for pilot Representations put in place in 2006 was the first attempt to measure the output of communication activities on a large scale using a pre-defined monitoring system. It was continuously improved, but only since 2007 a reporting system is in place that is much more systematic and elaborated than the somewhat arbitrary reporting in the annual activity reports by the Representations.⁷⁰ This new system for the first time includes pilot and non-pilot Representations. Like the reports available exclusively for the pilot Representations, the system measures output and to a certain extent outgrowth of communication - but not impact.

The question thus arises why the system does only work to a certain extent. According to different officials in the Representations, staff does invest considerable time in reporting and counting the number of events they organise etc., but the comparative use of the data remains limited, as the values put into the systems are still not always comparable. Firstly, not all Representations seem to fill in the form with the same rigour, which might be due to understaffing. Secondly, the figures provided by different Representations in the different categories (e.g. ‘visibility of Representations’, ‘participation in media events’, ‘press releases’) are not comparable, as the unit of analysis is not always well defined: Representations seem to be confused about what constitutes one unit of analysis (e.g. there were differences as to count the daily newsletter as one unit or to count it for every day).

Also, the charts emanating from the bi-monthly reports on the progress of the pilot Representations suggest that the ‘visibility of Representations’ was actually measured in all countries by monitoring media coverage. This only makes sense, however, if media coverage was monitored in a *systematic* way covering all important media outlets everyday. This did not seem to be the case, although the monitoring system was improved during the pilot exercise. Media coverage certainly does not equal impact (i.e. in terms of increased knowledge or change of attitudes or behaviour of the target audience), but it is nevertheless a *precondition* for reaching out to the general public. For certain means of communication (such as the websites of the Representations) coherent data is not available: Not all REP-websites are hosted by the EUROPA-server and not all of them measure usage.

The reporting of the Representations about their activities was certainly necessary and useful, as it provided us with a good idea of what pilot staff had been doing. It also represents a relatively cost-efficient way of providing feed-back. However, while reporting and self-evaluation can very usefully complement external evaluation (see also recommendations in the summary report), it cannot replace it due to a considerable risk of biased accounts. And even if assuming that officials give neutral accounts of their work, not everyone who may be good at communication also has the expertise to evaluate communication impact. We did not receive evidence of external evaluations having been commissioned by the Representations interviewed for our study in either

⁷⁰ Only for pilot Representations a reporting system was already put in place in the beginning of 2006.

2006 or 2007. Some pilot activities such as the targeting of regional media would have been a good opportunity for systematic evaluation of output, outgrowth and impact.

Data provided by public opinion surveys such as Eurobarometer (EB) also does not help to measure the impact of specific communication measures of the Representations. EB measures the awareness and public knowledge about the EU and we can observe differences between countries and over time, but there is no direct link to the communication measures of the Representations. It is much more plausible that other factors of the national political environment are much stronger in influencing awareness of EU policies on the national level. Impact measurement for the Representations' activities should therefore not be done by using the bird's eye perspective of general opinion surveys.

The points listed unfortunately represent serious caveats for the possibility of evaluating the impact and effectiveness of the different Representations, especially as concerns the use and efficiency of specific tools. We do however acknowledge the specific challenges of evaluating communication (see section 3.4.1 above). It must also be kept in mind that the costs incurred by an evaluation have to stand in relation to the activities evaluated and the potential benefits and savings that can be expected.

5.2.2. Making a difference I: Before and after the pilot experience

This section looks at the pilot Representations by comparing their work before the pilot experiment and today. We will go into greater detail on the evolution of the pilot experience in Germany, where the Representation in Berlin and the antennas in Bonn and Munich have obtained four additional officials and four contractual agents – more than any other country. We will also give an overview of the additional work done by pilot staff in the Representations in Paris, London and Dublin. For each case we will present two actions that the Representations regard as particularly successful and that would not have been possible without the pilot staff.

(1) The pilot project in Germany

The annual reports of activities of the Berlin Representation in the years 2001 until 2005 provide evidence of an aggravating state of crisis. Germany is especially hard to cover for the Representation, as the federal system provides a multitude of national political actors to be dealt with and similarly the media landscape is also fragmented along regional lines. On the one hand, the Representation complained that it received only 14 percent of the budget for the Representations in order to inform 22 percent of the EU's population.⁷¹ On the other hand, due to lack of staff, the Representation had to send back a 'substantial part of the budget' to Brussels since it could not be spent.⁷² The budget sub-delegated in the context of PRINCE was not matched by human resources with the consequence that *“la Représentation a du négliger d'autres activités, comme par exemple les contacts et l'assistance à la presse et au grand public [...] une*

⁷¹ European Commission (2004): Global Assessment Report on Implementation of the Communication Strategy on Enlargement.

⁷² European Commission (2003): Activity Report 2002 - Representation in Berlin.

détérioration de la situation semble être inévitable".⁷³ As early as 2002, the Representation had already asked for five additional officials. Due to a lack of staff, media relations with regional media could not be established, debates could not be organised and there were no systematic information actions towards the youth.⁷⁴

A clear vision of what should be done in the case of getting more staff won Berlin/Bonn/Munich the prize of getting more pilot staff than the other Representations. Among other aspects, in Germany the pilot staff covers those tasks that were just mentioned above as lacking under the old regime. Table 15 shows what the pilot officials and contractual agents did in Germany - which gives a clear evidence of their added value in terms of output.

Table 15. Tasks and output of the pilot officials in Germany (01.03.2006 – 31.12.2006)

Task description of pilot staff	Number of pilot staff involved
Coordination of the activities in Berlin/Munich/Bonn for youth, schools and civil society ; implement systematic listening in all of these activities Output: Meetings, Presentations, Openings, 50; Seminars on thematic issues (National /Local), 14; Internet moderation, 2; Meetings with local authorities, 2; Meetings with national authorities, 8; Events, 4; Other activities, 1.	1
Better coverage of the policy area " growth and jobs " and " better regulation " through a policy expert from the respective DGs Output: Participation in media events, 2; Visibility of the Representation, 1; Meetings, Presentations, Openings, 41; Seminars on thematic issues (National /Local), 28; Meetings with local authorities, 5; Meetings with national authorities, 16; Events, 38; Commissioners' visits, 3.	1
Correspondent for East Germany : Knowledge about and support for the EU is especially low in East Germany which lacks 50 years of experience with the European integration process Output: Participation in media events, 1; Meetings, Presentations, Openings, 39; Meetings with local authorities, 8; Meetings with national authorities, 9; Events, 11; Other activities, 7;	1
Correspondent for Parliamentarians : communicating with members of the Bundestag as well as with the 16 parliaments of the Länder Output: Visibility of the Representation, 7; Meetings, Presentations, Openings, 15; Seminars on thematic issues (National /Local), 2; Meetings with local authorities, 3; Meetings with national authorities, 7; Events, 3; Other activities, 2.	1
Media relations targeted at special journals (there are 4.318 of these journals in Germany) Output: Press conference, 6; Participation in media events, 4; Visibility of the Representation, 9; Press releases – Rebuttals, 14; Internet, 2; Meetings with national authorities, 1; Events, 2; Commissioners' visits, 1; Other activities, 24.	1
Media relations targeted at regional media situated in the respective antenna (as German regional press exceeds the readership of the national press) Output for Berlin Only!: Participation in media events, 2; Press releases – Rebuttals, 3; Seminars on thematic issues (National /Local), 1; Other activities, 6.	1

Source: EC Representation in Berlin.

The work of the four additional officers and four additional contractual agents focussed on increasing the quality and communicative output of the Representation in the above

⁷³ Ibid.

⁷⁴ European Commission (2002): Management Plan 2003 of the Berlin Representation.

mentioned areas. One example to be mentioned was the “EU project day in German Schools” that took place upon the initiative and in close cooperation with the German EU Presidency.⁷⁵ Top German politicians (e.g. Chancellor Angela Merkel) and almost 400 German Commission officials went back to (their) schools on 22 January 2007 to explain and discuss the EU with students. The three Commission Representations/Antennas in Germany were strongly involved and we were told that this action would not have been possible without the additional pilot staff. Due to ‘known faces’ from national politics the initiative received wide media coverage in German prime time news (e.g. ARD-‘Tagesschau’).⁷⁶ It is also likely to have had a motivating internal effect on Commission staff given that 99% of the participating officials made a positive assessment of the initiative after their visit (58% ‘great success’, 41% ‘a good initiative’).⁷⁷

Another action that was mentioned to us as a particularly successful example of ‘going local’ was a 1-day visit by two pilot staff members to the constituency of a German MP that is situated close to the border with Poland and the Czech Republic. The visit included meetings with all the important local multipliers (lord mayor and his team, ministers from the local church, directors of the local museum, cinema, theatre and school with their respective staff). Pilot staff also met with representatives from commerce and trade, from a body for trans-border regional cooperation and with the local press. They provided information on the role of the Representation and on major EU-related issues of relevance for the constituency (e.g. Lisbon Agenda, structural fund and lifelong learning, cultural programmes) and participated in a discussion on specific problems related to border issues. On the ‘input’-side of this action was the working time of the two pilots (1 day preparation, 15 hours presence, 1 day follow up) and it resulted (besides the actual meetings and discussions) in numerous requests for more information (regarding education, training and on the structural funds procedures) as well as an article in the press. Follow-up to the visit is ensured through correspondence and further e-mail exchange with the local multipliers and a good working relation with the member of Parliament. Local actors have already asked for an additional visit in a years’ time.

Speaking in more general terms, the success of networking with parliamentarians, journalists or schools has also created dynamics of its own: By now, far more requests for information and cooperation reach the Representation, so that the additional staff also created additional work for everyone in the Representation. Reducing the number of staff in such a situation would be detrimental to sustaining the level and quality of communication that has been established by the reinforcement of the Representation’s staff. Our interviews conducted in the Representations in Paris and London as well as the bi-monthly reports on all pilot Representations confirm a similar picture to what has been said about Berlin.

⁷⁵ See http://ec.europa.eu/deutschland/service/final_report_de.htm.

⁷⁶ “EU-Projekttag – Der Kanzlerin ganz nah”, at: <http://www.tagesschau.de/inland/meldung65834.html>.

⁷⁷ EU-Project Day in German Schools – Final Report, p.6, at: http://ec.europa.eu/deutschland/service/final_report_de.htm.

(2) The Pilot Project in Paris

The situation of the Representation in Paris used to be not much better than in Berlin prior to the pilot exercise. The French annual activity reports of this period also give long lists of activities which could not be implemented due to lack of staff.⁷⁸ This situation has changed significantly according to our interview with the Head of Representation and his staff. The following table gives an overview of the additional work that could be accomplished due to pilot staff.⁷⁹

Table 16. Tasks and output of the pilot staff in France July 1, 2006 – March 31, 2007

Task description of pilot staff	Number of pilot staff involved
<p>Task description: Political intelligence</p> <ul style="list-style-type: none"> - Early warning during national elections (weekly newsletter for key persons in COM) - Specific EB on French opinion towards Europe, press conferences on EB surveys - Activities of the REP <i>Cercle de reflexion</i> think-tank - Specific follow up on the Lisbon agenda in the French context <p><i>Output (examples):</i></p> <ul style="list-style-type: none"> - 64 political notes (Flash reports, political newsletters, briefings and speeches) - Seminar on the institutional settlement (reaching 120 key decision makers) 	0.5
<p>Task description: Regional press – Commissioners going local</p> <ul style="list-style-type: none"> - Extension to regional media (65 titles and readership of 18 million/day) - Provision of training in Brussels for regional journalists - Increased Commission & Commissioner visibility in regional press, radio & TV <p><i>Output :</i></p> <ul style="list-style-type: none"> - 13 interviews and articles by Commissioners (e.g. Barroso in Ouest France) - 6 major regional press conferences (e.g. Fischer-Boel 3 day-visit Bordeaux region) - 2 training courses for Ouest France and for France 3 regional TV 	1.5
<p>Task description: Going local</p> <ul style="list-style-type: none"> - Increasing the number of presentations/speeches in conferences, congresses, seminars - Development of the Europe Direct network; listening function ("micro-trottoirs", etc.) - Contributing to the reshuffling of the Team Europe - Designing and launching a newsletter for local authorities and civil society <p><i>Output (examples):</i></p> <ul style="list-style-type: none"> - 127 presentations/speeches - 7 new Europe Direct relays (in addition to the 37 pre-existing) - 1650 citizens interviewed by the ED teams - Total reshuffle of the Team Europe (28 members) - Distribution of newsletter increased from 7 500 to 75 000 (including 36 000 Mayors) 	1.5
<p>Task description: Special events</p> <ul style="list-style-type: none"> - Reaching out to new target groups <p><i>Output (examples):</i></p> <ul style="list-style-type: none"> - Co-production of the TV program (3,8 mill. viewers in France; 70 mill. in 12 EU-MS) - 8 large regional debates with 22 000 participants and a wide press coverage 	1

⁷⁸ European Commission (2003), Rapport d'évaluation des activités sur l'élargissement 2002-2003, Paris.

⁷⁹ All points listed by the Representation have been included, but they had to be shortened at times in order to match the format of the study. The Paris Representation also stated that pilot staff was given a core task, but in order to create synergies, they were fully included in the work of the Representation. Some of their activities during the indicated period are therefore not reflected in the table.

<ul style="list-style-type: none"> - Open doors (exhibitions, conferences debates, generating 2 500 visitors) <p>Task description: Youth actions</p> <ul style="list-style-type: none"> - Workshops for children at schools, targeting young audiences - Cooperation with French authorities concerning Salon de l'Education (500 000 visitors) <p><i>Output (examples):</i></p> <ul style="list-style-type: none"> - 25 school visits (650 children reached); 2 quiz and 2 visits of young people to Brussels 	0.5
<p>Task description: Website</p> <ul style="list-style-type: none"> - Total revamp of the website, new site launched, regular updates - Moderating the forum <i>Debate Europe</i> - Reinforced cooperation w/ website <i>touteurope.fr</i> (10000 visitors/day) on special events <p><i>Output (examples):</i></p> <ul style="list-style-type: none"> - 70 606 visits, 43 146 visitors, 180 912 pages views, 225 601 downloaded files 	1

Source: EC Representation in Paris.

One action that was mentioned as particularly successful and that would not have been possible without the commitment of pilot staff was the co-production of a movie ("*Nous nous sommes tant haïs*"). It came at a cost of €188,658 for the Representation and reached 3.8 million viewers in France as well as 70 million viewers from all over Europe in 12 different countries (notably Belgium, Poland). There was considerable media coverage, with more than 100 press articles as well as radio and TV reports representing an audience of 20 million people. A DVD was sent to all collèges and Europe Direct relays in France (i.e. 7,112 points of distribution for a total cost of €45,000).

A second good example for the added value of pilot staff mentioned by the Representation was the creation of a think tank ("*A l'écoute des Français*": *Cercle de réflexion*) that comes at a cost of €49,754. It involves 250 volunteers, mainly from civil society, who are organised in five working groups (youth, education, social partners, local authorities, communication). It has gathered six times in plenary meetings (around 80 participants each), in addition to regular meetings of the five working groups (42 sessions). It has delivered a key report (based on feedback from the ED relays, from ad hoc opinion surveys and on the conclusions from the working groups) sent to the Commission, the French authorities and to more than 400 key decision makers. The report makes suggestions about how to improve EU communication and presently provides the frame of various seminars/conferences (Institutional settlement, CFSP, Social reality, Internal Market Review, Budget Review) gathering around 100 participants per event. It has caused significant press coverage, including articles in leading newspapers such as *Le Monde* and *Les Echos*, representing an audience of more 600 000 readers.

(3) The pilot project in London

Table 17 gives an overview of the activities of pilot staff in the London representation. It should also be noted that, even with pilot staff, the London REP presently has not yet reached the level of staffing that it used to have at the end of the 1990s.

Table 17. Tasks & output of pilot staff in London July 1, 2006 – March 31, 2007

Task description of pilot staff	# of pilot staff
<p>Task description: Regional stakeholders</p> <ul style="list-style-type: none"> - Closer relationships across the 9 English regions (local/regional govts & multipliers) - Identifying groups most affected by new funding round for establishment of close cooperation and future channels of communication (capacity building) <p><i>Output (examples):</i></p> <ul style="list-style-type: none"> - 16 regional seminars on structural funding for key stakeholders,(20-30 participants each) - 1 maritime conference (reaching 100+ audience involved in maritime affairs) - 6 lectures on issues other than structural funding (e.g. “From localism to globalism: the South West, Europe and the wider world”) for audiences of 50-60). 	1
<p>Task description: Regional networks</p> <ul style="list-style-type: none"> - Working directly with the Europe Direct centres (first established in UK in 2006) - Animating debate, advice on logistics & operations, helping network the networks - Interoffice communication – linking regional stakeholder officer and political section with London-based stakeholders (value-added for the ED centres) <p><i>Output (examples)</i></p> <ul style="list-style-type: none"> - 9 Europe Direct launches attended by 100+ people - 2 policy seminars (on climate change and the services directive, 50-60+ people) - 3 roundtables with regional stakeholders to raise awareness of ED centres. - 1 network of networks launch (provision of workshops & seminars for 60+ people) - 1 UK networks conference (for all EU-funded relays, participation of 200+ people) 	1
<p>Task description: Work w. academia/Creation of European Public Space/special events</p> <ul style="list-style-type: none"> - Create permanent steering committees of policy specialists, press officers and cultural attachés with staff of EU 27-embassies in London - Use these structured networks to increase reach of EU communication priorities - Working with the cultural attachés on “Ambassadors in Schools project” (9 May) - Working with key academic institutions: Lectures on the future of Europe - European public space: Working through the cultural attachés & various institutions on series of exhibitions/poetry readings/concerts etc in collaboration with embassies & EP <p><i>Outputs (examples)</i></p> <ul style="list-style-type: none"> - 10 art exhibitions/poetry readings/concerts: total audience 500+ people - 4 speeches to schools (in addition to those given by EU Ambassadors on 9 May) - Creation of a “schools pack” specifically for the Ambassadors in schools projects - 5 major policy speeches (RSA, LSE, Kings’ College, Oxford, Manchester) - Organisation of the events to celebrate Europe at 50 (without pilots only on lesser scale) 	2
<p>Task description: Press: AV/radio/specialist press work</p> <ul style="list-style-type: none"> - Hire of staff with AV/radio experience: Contacts across all AV/radio media outlets. - Particular concentration on new media & BBC on line - TV coverage for major policy announcements: Setting up press shoots & providing advance warning, pictures and interviewees required by TV - Coverage of the EU/Manchester United football match (millions of viewers worldwide) - Hire of a senior ex-journalist: Op-eds for Commissioners, more UK specific press releases, engaging the specialist press more directly (e.g. on roaming). This has given Commission a positive image for the first time in traditionally hostile papers (e.g. Daily Mail). <p><i>Outputs (examples)</i></p> <ul style="list-style-type: none"> - Contacts provided for more Commissioners to be interviewed - Systematic quantification difficult; principle news shows have viewers of 60,000+ 	2

Source: EC representation in London

One of the particularly successful actions that became possible due to pilot staff was the ‘EU vs. Manchester United’-football match. It raised awareness for the positive and tangible benefits of EU membership among audiences that are traditionally very hard to

reach. It attracted 75.000 viewers at the stadium and reached a total UK media audience of over 25 million. It also got large press coverage and was broadcasted abroad with an EU TV audience of an estimated 6 million on 26 European channels.

A second action of pilot staff that could be mentioned here is the creation of a network of regional stakeholders, which aims at capacity building across the country. These networks were slow to build up, since the UK Representation started working from a very limited base due to frequent reorganisation of local/regional government and a lack of resources. The refusal of the UK government to endorse the creation of a Europe Direct network until 2006 represented an additional challenge. Since 2006 the UK Representation managed to organise a total of 50 different meetings across the country, (excluding network of networks), thus reaching around 5,000 key communication professionals and key stakeholders.

The Representation stated that its activities have tended to be ad-hoc and did not reflect any systematic strategy of communication in the past. Thanks to the work of the pilot staff the Representation has been enabled to create a more solid base from which it will run policy seminars, roundtables and press events for 2008.

(4) The pilot project in Dublin

The following table provides an overview of the tasks carried out by the pilot staff in Dublin:

Table 18. Tasks and output of pilot staff in Dublin July 1, 2006 – March 31, 2007

Task description of pilot staff	Number of pilot staff
<p>Task description: Education Liaison Officer Encouraging study of the EU in Irish primary and secondary schools <i>Output (examples):</i></p> <ul style="list-style-type: none"> - 350,000 of "Your passport to Europe" (publication) sent to 3,400 primary schools - Production of DVD; "IRL and the EU" circulated to all 750 secondary schools in IRL (also used for groups visiting the Representation) - Production of two teacher guides for early secondary school students & DVD/web based product ("Europack") for teachers of senior secondary students - Attendance to Young Scientists Exhibition, annual conferences of primary and secondary school teachers (incl. distribution of materials & explanation of REP) - 1-week primary school teachers training course (total of 26 teachers participated) 	1
<p>Task description: Attendance at Exhibitions and Special Information Actions <i>Output (examples):</i></p> <ul style="list-style-type: none"> - Presence at the 1-week 'World Ploughing Championships' (estimated 300,000 visitors): Distribution of info materials; lectures and seminars on EU in the exhibition area - Broadcast of BBC radio programme ("Any Questions") from Dublin for 50th anniversary of Treaty of Rome. (REP arranged all logistics including invitations.) - Ecumenical church service held in Dublin at request of REP to mark 50 anniversary - Cooperation with Belfast Office on 9 May 07 (incl. steam train trip Belfast- Dublin) 	1
<p>Task description: Consultations, Debates and Political Reporting <i>Output (examples):</i></p> <ul style="list-style-type: none"> - Consultations on 'Social Policy Review' (e.g. meetings w/ specific interest groups) - Debates in 3rd level colleges - Political reporting undertaken as appropriate opportunities arose 	1

<p>Task description: Assist. Press Officer (ex-journalist) for regional, specialist & new media</p> <p><i>Output (examples):</i></p> <ul style="list-style-type: none"> - Triplication of press releases (together with Head of Press) - With help of pilot, 90% of press releases adapted for Irish media (incl. versions for tabloids & regional papers where appropriate); rewriting of press releases for Rep web-site - Regular articles for specialist publications on various policy priorities - Articles, images & advertising prepared for specialist & regional press in connection with major public events (e.g. 50th celebrations) - Fortnightly 'advance news agenda' designed for Irish media - Increased contacts with regional press & local radio (several itws per month) - Weekly production of in-house audio-files for release to 30 local radio stations - Creation of podcasts (sound files) for use on REP website - Re-look for weekly newsletter and connection of all articles to REP web-site; - Monitoring of Internet and regional media - Updating and creation of new contacts lists - Assistance in contractual, monitoring & administrative work (necessary due to increased work-load of pilot project); creative input to press planning and strategy 	1
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Source: EC representation in Dublin

A successful action that was only possible due to pilot staff was the **'European Passport for Primary Schools'**. The document was written and designed in the Representation and was met with a large number of requests from schools. As a result, it was decided to engage in a mass mail-out of the document. A total of 40 copies were issued to each of the 3,400 primary schools in Ireland. About 350,000 in total, both in Irish and English language, have been circulated. Many schools requested additional copies and the Representation stated to have received numerous requests also for the 2007/8 academic year.

The **creative use of new media** was a second area where pilot staff was particularly engaged in Dublin. 'Sound' press releases in the form of audio files were produced and then sent to 30 local radio stations on a weekly basis. Podcasts and the newsletter have been put on the website. Due to these elements as well as navigational improvements and re-writing of material for the REP's website, visits increased from approximately 3.000 per month to around 12.000 per month and continue to rise.

(5) The pilot project in general

The bi-monthly reports on the activities of the pilot Representations give many further examples how pilot Representations have been able to improve their activities in the following areas:

- Enlarging media relations towards regional and local media
- Tailoring central press releases to the needs of national media
- Regular briefing of national and specialised journalists
- Enlarging public affairs to regional and local authorities as well as parliamentarians
- Establishing the heads of Representations as public faces in the media
- Better organisation and more effective media relations during the increased number of visits of Commissioners

- Re-launch of the Representation's websites, more frequent updating of web sites
- More communication activities in schools
- A better coordination of information relays
- A better linkage of general EC campaigns to activities of the Representations
- Better and more political intelligence

We also took note that various innovations introduced in pilot Representations over the past few years (e.g. systematic networking with regional media, combining 'traditional' and electronic media, advertising information sources, audio files designed for local radio) have been sighted as best practices and have been shared among all Representations. The pilot scheme has therefore also provided new ideas and practices that can be exported to other Representations.

A quantitative account of the output of the pilot Representations is given in Table 19 below. Comparing the output indicators for the average of two months in 2005 and 2006, we find that across the board, the quantitative output has doubled. Even if the numbers may not be reliable for all activities in all Representations and have to be interpreted with caution, the general trend is nevertheless obvious: The relatively modest growth in staff has led to a substantial growth in communication output. On the one hand, this is a positive finding proving the use of the pilot personnel. On the other hand, however, the rise of activities across the board reveals that Representations did not always prioritize in using their pilot staff. Instead of doubling the number of thematic seminars and presentations one could also have headed for focusing on communication measures that reach a broad audience via the media.

Table 19. Average output of the pilot Representations within two months

Year	Berlin		Paris		Madrid		Dublin		Average all*	
	2005	2006	2005	2006	2005	2006	2005	2006	2005	2006
Press conferences	7	5	2	4	4	6	1	3	2	4
Participations in media events	3	14	12	24	8	16	0	1	4	11
Press releases and rebuttals	100	145	n.a.	93	3	22	30	67	23	55
Meetings, presentations and openings	35	63	6	11	8	15	0	4	9	17
Thematic seminars	8	16	5	17	5	11	0	1	4	8
Meetings with local authorities	10	8	12	36	3	5	0	1	5	7
Meetings with national authorities	10	15	10	27	8	7	1	1	5	7
Instit. events	10	21	2	7	16	8	1	6	4	6
Average	23	36	7	27	7	11	4	11	7	14

* Including all 11 pilot Representations and Antennas.

Source: Own elaboration based on the reports from the pilot Representations.

An overall positive development for all activities is also shown by the graphs in annex 4: All curves for 2006 and 2007 lie above the baseline that was established based on an estimated number of activities for 2005. Some indicators for 2007 still continue to rise in comparison to 2006 (press conferences, thematic seminars) while others stabilise at a high level (participation in media events, meetings/presentations/openings) or decrease (meetings with local and national authorities, institutional events). The explanation for the latter could be related to contractual pilot staff starting to leave the Representations, but also to REPs using the reporting tool in a more restrictive manner (i.e. not counting each and every activity on a singular basis, but in a more aggregate way).

Unfortunately we are not able to give comparable figures for communication outgrowth and impact, but from the large increase in output it is realistic to assume that both outgrowth and impact also have increased. We cannot say, however, how large this increase was.

Keeping in mind the strong general limitations of survey data that were already pointed out above, we will nevertheless have a look at some Eurobarometer data on the awareness of the Representations and the knowledge about the EU. It might give some indication on whether the increased information effort did have any measurable impact. There is one Eurobarometer (197) that measured the awareness of the pilot Representations among national decision-makers, but unfortunately, the study is methodologically not very sound. Apparently, it sampled different groups of opinion leaders e.g. 75 journalists and 50 teachers per country – irrespective of the country size. This creates a very high margin of error for countries like Germany. Therefore, we should not over-interpret the seemingly falling awareness of the Representations among decision makers as shown in Table 20 below. The only aspect that might be derived from the figures: Awareness of the Representations even among key target groups like teachers, journalists, politicians has not risen according to the data. It might even have fallen – which is also plausible as the referenda on the European Constitutional Treaty in 2005 drew considerable attention to the EU and possibly also to its Representations. The positive interpretation of this data would be that awareness remains on a relatively high level among well-informed opinion leaders.

Table 20. Awareness of the Representations among decision-makers

Have you already heard of the Representation of the European Commission in ...? Share of “yes” in %	DE		FR		Average all*	
	2005	2006	2005	2006	2005	2006
	77	68	64	42	71	63

* Including all 11 pilot Representations and Antennas.

Source: Flash EB 197.

The general public, however, remains largely ignorant of the EU and all the more about institutional specifics such as the Representations of the Commission. The pilot exercise has not really changed this as Table 21 reveals for Germany and France where a significant part of the population still remains unaware of the enlargement of the EU from 15 to 27 Member states. The number of people who have realized that the EU has enlarged beyond 15 countries for some time now has not grown between 2004 and 2007.

Table 21. Awareness that EU has enlarged beyond 15 member states

Percentage of respondents who were aware of the fact that the statement “the EU has 15 member states” is wrong.	DE		FR		Average EU	
	2004	2007	2004	2007	2004	2007
	/fall	/spring	/fall	/spring	/fall	/spring
	60	57	72	74	58	57

Source: EB 62 and EB 67.

The broad ignorance about the EU becomes even more apparent when citizens are asked to tell whether the following three statements are true or false:

1. The EU has 15 member states (see above).
2. The Members of the EP are directly elected.
3. Every six months a different member state takes the EU presidency.

Only 16 percent of respondents on EU-average were able to answer all three questions correctly in fall 2006 (Germany: 12 %; France: 17 %), according to EB 66.

Against this background the overall conclusion must be: The increase in staff has improved the quantity and quality of the communication activities of the Representations, however not in a way that would be measurable on the aggregate level of public opinion. The level of awareness and knowledge reached among opinion leaders might be satisfying, but not among the general public. Two alternative conclusions are possible that are not mutually exclusive: (1) The Representations would need even more resources in order to pass the threshold of public awareness. (2) The Representations would have to use their resources in a different way to pass the threshold of public awareness. We think that both conclusions are valid. In section 5 of the summary report, we have given recommendations on how the Representations could reach out to the general public still more effectively.

So far, we have found that the extra staff has clearly enhanced the work of the pilot Representations, but the question remains whether they also outperform non-pilot Representations.

5.2.2. Making a difference II: Pilot and non pilot Representations

The ‘Action Plan’ binds both pilot and non-pilot Representations. *“All Representations carry out the Commission’s policy for more dialogue and transparency. Too often however they lack the capacity to meet the ambitions set by the “action plan”, Margot Wallström writes in an information note to the Commission in December 2006.⁸⁰ One of the reasons for this is the severe understaffing of some of the Representations, especially among those that have not been promoted to pilot status: It has been shown already that e.g. Poland and Spain with a comparable size of population have very unequal resources with Spain having a budget that is seven times bigger than the budget of the Representation in Poland and a staff that is two times bigger. It hardly comes as a*

⁸⁰ European Commission (2006). Information note from Vice President Margot Wallström to the Commission: Improving the Commission's ability to communicate Europe by going local: Results from the pilot representations Project (Action n° 48), December 2006.

surprise the pilot representations also perform much better in terms of their communication output, as the Table 22 illustrates.

Table 22. The output of a pilot and a non-pilot Representation catering for a comparable audience of about 40 Mio. EU citizens

First semester 2007	Non-pilot	Pilot
	Warsaw	Madrid
Press conferences	14	5
Participations in media events	99	85
Press releases by the Representation	30	17
Meetings, presentations and openings	38	67
Thematic seminars	23	46
Meetings with local authorities	20	13
Meetings with national authorities	60	34
Institutional events	15	31
Commissioner's visits	9	15

Source: DG COMM.

While the overall output of the Representation in Madrid is clearly higher than that of the one in Warsaw, this is not the case for all activities across the board. According to the data retrieved from the DG COMM reporting system, in the first semester of 2007 Warsaw gave more press conferences, participated in more media events and wrote more press releases. This has to be explained with the specific political context in Poland during that period where several EU-related issues have been discussed in a very controversial manner by the media.

Representations like Warsaw with a total staff of 19 people and only 4 AD officials report that they are forced to cut down on communication and the Head of the Representation has to devote large parts of her working time to administrative matters. Warsaw is also an example of a Representation that due to a lack of specialised staff is not able to answer all questions from journalists in a satisfying way on all topics of EU policy-making. The Representation is also not able to serve public demand for information on the structural funds, as there is no official in the Representation who could focus solely on this issue. Warsaw used to have staff numbers of around 100 people when it still was a Delegation. This certainly included to a large degree officials who were dealing with the administration of pre-accession aids (TACIS, PHARE), but downsizing it to 20 people seems to be inadequate in a difficult national communication environment. A problem that seems to be specific to the Representations in some new member states is the relatively bad remuneration of staff due to the correction coefficient on EU wages. Apparently this coefficient is not up-to-date anymore to the rising prices in cities like Warsaw, thereby making working at the respective Representations potentially unattractive to well-qualified personnel.

Also the following two tables illustrate the differences in output between two sets of Representations that cater for a comparable number of citizens. Again it becomes

visible that with relatively little extra staff a disproportionately higher number of activities could be achieved. While the Finnish REP cannot outperform the other two on output for any of the activities, both the Danish (press releases, thematic seminars, meetings with local and with national authorities) and the Irish (participation in media events, press conferences) can set clear priorities.

Table 23. The output of a pilot and a non-pilot Representation catering for a comparable audience of about 4.2-5.2 million EU citizens

First semester 2007	Non-pilot	Pilot	Pilot
	Finland	Denmark	Ireland
Press conferences	12	5	42
Participations in media events	38	24	87
Press releases by the Rep.	130	236	155
Meetings, presentations and openings	37	42	37
Thematic seminars	26	35	11
Meetings with local authorities	1	8	1
Meetings with national authorities	-	13	1
Institutional events	6	6	6
Commissioner's visits	14	14	3

Source: DG COMM

Another example of the difference that the pilot Representations make is the following comparison between Portugal and Greece. The Representation in Portugal dominates in all domains over the one in Greece. Even if the figure for media events is probably not fully comparable, it illustrates the strong outreach to local and regional media of the Lisbon Representation. Across categories the Lisbon was able to deliver between 30 to 60 percent more output than the Athens, although Lisbon only disposes of 25 percent more communication staff (Lisbon: 16, including 2 pilots; Athens: 12)⁸¹. As regards press releases, the output in Lisbon is even more than four times higher.

Among pilot *and* non-pilot Representations we observe a striving towards more proactive and more professional external communication activities. This development is much more pronounced in the pilot Representations, however, as they have the staff to do so. In some of the non-pilot Representations keeping up the daily routine constitutes the main challenge and there is not much room for innovative and pro-active communication activities. This was a point particularly stressed concerning the Representation in The Hague. The Representation only disposes of 13 staff members engaged in communication and information⁸², of which 3 AD-officials engaged in the core communication activities (including the Head of Representation).

⁸¹ Figures provided by DG COMM.

⁸² Figures provided by DG COMM.

Table 24. The output of a pilot and a non-pilot Representation catering for a comparable audience of about 11 million EU citizens

First semester 2007	Non-pilot	Pilot
	Greece	Portugal
Press conferences	7	10
Participations in media events	45	979*
Press releases by the Representation	64	277
Meetings, presentations and openings	14	20
Thematic seminars	18	32
Meetings with local authorities	1	2
Meetings with national authorities	4	10
Institutional events	2	5
Commissioner's visits	14	23

* This figure includes the articles sent by the Representation to 20 regional and local newspapers.

Source: DG COMM

Table 25 illustrates the precarious situation in a country of 16 million people and – at least since the no-votes of 2005 – with a rather Eurosceptic public opinion. Although the Dutch population is significantly larger than the Portuguese, especially the output concerning press and media work is dramatically lower in The Hague, which gives evidence of a considerable lack of resources as compared to the one in Lisbon.

Table 25. Output of the non-pilot Representation in The Netherlands (16 mill. EU citizens) as compared to the pilot Representation in Portugal (11 mill. EU citizens)

First Semester 2007	Non-pilot	Pilot
	The Netherlands	Portugal
Press conferences	3	10
Participations in media events	13	979*
Press releases written by the Representation	3	277
Meetings, presentations and openings	28	20
Thematic seminars	28	32
Meetings with local authorities	6*	2
Meetings with national authorities	20	10
Institutional events	3	5
Commissioners visits	13	23

* Not including civil society meetings of HoR or Deputies

Source: DG COMM

The overall finding of this section is thus that extra staff can clearly make a difference when comparing the work of the pilot and non-pilot Representations as well as when looking at the development of individual pilot Representations.

5.2.3. A look ahead: the future of the pilot experience

It is not clear, however, whether the enhancement of communication through the temporary addition of pilot staff will be sustainable. This is due to two reasons: The first one is the decision to replace AD officials by contractual agents. The second one concerns the timing and management of the current extension of the pilot project.

The Annual Policy Strategy 2008 provides for 25 contractual agents to replace the pilot officials. This makes the exercise a lot cheaper since the remuneration of contractual agents is lower than those of officials who were sent on long term mission to the Representations and also received additional mission allowances. On the other hand, however, these savings do come at a price: Firstly, contractual agents are not allowed to carry out “core tasks” for the Commission according to staff regulation. Secondly, they are not suited as well as pilot officials for a number of external communication tasks and also some management tasks: Contractual staff usually does not know the Commission and its policies as well as officials and therefore are less well-positioned to communicate on specific EU policies. Thirdly, they cannot serve as contact points between line-DGs and Representations in the same way that the officials can, as the latter are sent by these DGs. The importance of good networks and communication links to the respective DGs in Brussels should not be underestimated in this context. Finally, for excellent applicants, the contractual agent post is not particularly attractive: It is not only limited in time, but also much less well-paid than that of a Commission official. While it is certainly true that local knowledge and personal commitment are important factors that are not necessarily linked to the status and remuneration of staff, it must thus be stressed that AC posts do attract applicants with a different profile. This applies especially for more senior staff, as the rising gap between junior and senior levels makes career perspectives less attractive for contractuales. The table illustrates the differences at AD 5-level and AD 10- level:

Table 26. Net Pay comparison between officials and contractual agents⁸³

For a person employed in Belgium or Luxembourg with the expatriation allowance Without household allowance and without children		
	AD 5 Step 1	AC IV Grade 13 Step 1
NET PAY (€)	3847.58	2820.58
For a person employed in Belgium or Luxembourg with the expatriation allowance With household allowance and with two children between 6 and 10		
	AD 10 step 1	AC IV Grade 15 Step 1
NET PAY (€)	8150.90	4698.63

⁸³ Data provided by DG COMM, calculated with the calculator available on Pers-Admin website.

Replacing officials by contractual agents may thus work for some tasks, but for many tasks that the pilot officials were performing it will probably not work. The success of the pilot mission is already diminished with the uncertainty that surrounds the continuation of the project. At the time of writing this study (October 2007), already a fifth of pilot seats are empty: Posts are not filled because they can currently not be renewed after December 2007. In interviews at the beginning of September, some leading officials in the Representations stated that they do not know whether there will be replacements for the pilot staff. Long-term projects cannot be realised with such short-term management of personnel. The pilot project – while having had a very promising start – seriously risks losing momentum and may even fail in the end.

Annex 1.

Methodological Background

The State of the Art: Good Practices in Governmental Communication⁸⁴

Communication policy is in many ways quite different from other policy areas and does not lend itself easily to evaluations, particularly not with regards to the crucial question of whether communication objectives have been actually reached and a certain impact accomplished. The problem is compounded by the fact that scientific research on communication is predominantly driven by the field of public relations and some studies extolling best practices are motivated by commercial interests. Most approaches focus on communication controlling in the private sector, considering primarily customer, financial, and media relations. With regard to the communication of public authorities, little theory about reliable best practices and benchmarks exists beyond practical experiences and how-to handbooks (Lee, 2000b). Nevertheless, most of the key recommendations from the existing literature apply also – or can be adapted – to public affairs communication.

This study has used the state of the art in the literature as a first yardstick to evaluate whether five major aspects of the ideal-typical communication process (see below) in the European Commission are in line with good practices. For each of the aspects, we formulate key questions that are essential to good performance with regard to the criteria of efficiency, effectiveness and relevance. When the literature is scarce or imprecise, for instance regarding coordination, we look at other sources such as the cases of two member states, Germany and Britain, as external benchmarks. This deductive method is complemented by an inductive approach in so far as our interviews have revealed a number of good as well as bad practices, which are not commented on in the literature, but which we consider nevertheless important. Most of the yardsticks will be qualitative in nature, which is as much a reflection of the state of the art in the area as it is of the time-frame available to this study to examine these far-reaching questions.

This study starts from the **definition of external communication as the management of organisation-stakeholder relationships** (Grunig & Grunig, 2001; Hon, 1998; Lindenmann, 1998). As unidirectional, persuasive approaches have been largely discarded (Pinkleton, Weintraub Austin, & Dixon, 1999), the prime goal of communication should be the quality of the mutual relationship between the communicating organisation and strategic publics (Bruning & Ledingham, 2000). This definition is in line with the Commission's strategic goal of fostering two-way-communication and emphasises the role of various publics/stakeholders in defining problems, priorities and objectives. Organisations typically are party to multiple such relationships, each of which must be assessed with regard to the specific properties of the linkage between organisation and public. Most public authorities sustain strategic

⁸⁴ This section has been co-authored with Christian Baden, University of Amsterdam.

relationships with those affected by the authority's regulation, with superior and subordinate agencies, the media, the general public, and several other groups (Dozier & Ehling, 1992; Gelders, 2005; Grunig & Hon, 1999; Lee, 2000a).

1) Defining the Problem, Setting Objectives, Identifying Target Groups

The effectiveness, efficiency and relevance of external communication hinges on the appropriate definition of problems and the setting of objectives. All communication programs need something that was improvable before – a problem or an opportunity. Where there is no or not appropriate identification of those interests, the best communication will change little. It is important to note, however, that the definition of such problems or opportunities cannot exclusively be based on the views within the organisation. Stakeholders have also a key role to play in defining what a problem or need is. If nobody shares this perception at the outset, the organisation might need to raise awareness of it first, so that stakeholder understand what hurts the mutual relationship; if one does not recognize a problem that a stakeholder has with the organisation, one cannot solve it. Hence, the problem definition already provides an organisation with half of the evaluation indicators it needs to establish in order to solve it (Watson & Noble, 2005).

In order to evaluate communication effectiveness with regard to these relationships, one needs to derive measurable **objectives** that are directly relevant to the publics under investigation. At an abstract level, the relationship qualities relevant for organizational success are usually described as

- trust (in integrity, dependability, competence),
- satisfaction (and positive expectations),
- commitment (to a continued relationship, both cognitive and affective) and
- control mutuality (in this context best translated as the perception of mutual responsiveness to concerns) (Grunig & Grunig, 2001; Grunig & Hon, 1999).

It is important to note that these qualities are mutual, i.e., they can be evaluated on both sides of the relationship (Grunig & Grunig, 2001). Evaluation thus ideally takes both internal and stakeholders' perceptions of the existing relationship into account (Graber, 2003). It is thus recommended to formulate evaluation criteria, and consequently communication objectives in the first place, in terms of achievements valuable to both the organization and the stakeholder group (Fleisher & Mahaffy, 1997; Grunig & Grunig, 2001).

Getting the **target group** right is of key relevance for the definition of objectives, but not quite so simple. Intermediary organizations, and the media in particular, play a double role (Rijnja, 2000). As professional stakeholders, they are party to one kind of strategic relationship. It can be evaluated in terms of ascertaining journalists' perceptions of, expectations from, and behaviour toward a given public body. With regard to their members, specific audiences, or *the* public at large, however, they are merely mediators, and the focus of evaluation must be the organization's relationship(s)

with the ultimate stakeholders (Brüggemann, De Clerck-Sachsse, & Kurpas, 2006). Media relations, including journalists both as stakeholders and mediators, comprise at least two different objects of evaluation. “Friendly” journalists do not automatically make “friendly” publics.

Although literature offers some tools to obtain more or less direct indicators of relationship qualities, such measurement is rather complicated and requires extensive research. More often, objectives are not formulated in terms of relationship qualities, but concrete goals on a lower level, which are thought to be conducive to a particular relationship. In order to be evaluate-able, such objectives need to be specific, measurable, and realistic. Realism is needed because overshot objectives deliver bad evaluations, which may misrepresent communication achievements and endanger organizational support for communication. Specificity requires delineating precisely the targeted public, the intended change, and the time frame (Hon, 1998; Watson & Noble, 2005). Measurability requires that goals must be quantified and operationalised towards indicators (Anderson & Hadley, 1999; Gregory, 2001). Beyond this, objectives should be plausibly linked to the overall goal to improve the named relationship qualities. Unless such a connection can be made, communication activities may still achieve impacts, but their utility to the both sides remains unclear (Freitag, 1998). You can boost ‘evaluation success’ by setting trivial objectives, or you can promise vast changes you will never deliver. Neither does the standing of the communication department much good. Budget authorities and superiors neither value trivial contributions, nor constant shortfall. The challenge is therefore to be ambitious, yet realistic.

Closely related to recommendation of being realistic, specific and measurable in setting objectives, an organisations in general and communications planners in particular should give some thought to the different kinds of intended **effects**, which are more or less directly related to relationship quality (Besson, 2004). The following five categories of effects may appear at first glance removed from day-to-day practice, but are in fact extremely helpful for analysing whether a public body has thought through what it wants to achieve and how it wants to measure its achievements (see also the evaluation section):

One level of effect is of course *communication output* such as press statements sent, money dispersed, ads brought, films sponsored, requests answered, or conferences held.

However, it is hardly a valid indicator of anything. Such figures reveal nothing about the quality, reach, impact, or utility of communication activities (Grunig & Grunig, 2001; Xavier, Johnston, Patel *et al.*, 2005).

The second level is *outgrowth* such as response rates to communication: Media clippings collect how many articles were published as consequence of media statements, sometimes further qualified by media reach, placement and ‘advertising value equivalent’. Attendance figures are used to evaluate the success of events, and web hits indicate the success of online information. Although such criteria may be interesting indicators – e.g., continuously well-covered press releases may reflect good relations with journalists – they are usually taken for what they are *not*: indicators of a

relationship with the media public (Gregory, 2001; Hon, 1998; Noble, 1999; Xavier et al., 2005). These measures allow assessing the availability of information to potentially interested stakeholders, and allow guesses how many were exposed to it. However, it neither considers whether the information was actually retained, nor whether it led to any impact beyond this.

Outcome I: Awareness/Knowledge. Impact can be assessed in terms of knowledge gains that can be traced to communication activities. Particularly in public information, dissemination is often treated as a goal of itself, although some ambition to affect also attitudes and behaviour as well is rarely absent (Graber, 2003). The most common problem when knowledge is evaluated is that objectives are too vague (e.g., “raise awareness” – which is technically fulfilled if one more person claims to be aware). In view of assessing relationship qualities, both parties’ accurate mutual awareness is clearly an important dimension of evaluation. It is, however, different from:

Outcome II: Attitude. This is arguably the most difficult level to measure communication impacts. However, most attributes of relationship quality can be found at this level. Public sector communication towards the general public and other powerful stakeholder groups often (more or less implicitly) pursues so-called attitudinal goals (e.g., increasing supportiveness, trust, and openness). Evaluations of attitude changes, however, if it is attempted at all, often suffer from unclear objectives, as well as the impossibility to trace detected changes (or lack thereof) unambiguously to communication measures (Grunig & Grunig, 2001).

Outcome III: Behaviour. Here, the link to communication activities is even more ambiguous and most obvious only when things have gone wrong (e.g., protests, complaints, no-votes). However, often behavioural change is the outcome intended by communication activities (e.g., compliance, providing resources or information, changing harmful lifestyles). Behavioural measures are rare in evaluation, mainly because communication impacts can hardly be isolated validly.

Key Questions

1. Does the Commission/line-DGs listen to the various stakeholders when identifying problems and communication priorities?
2. Does the Commission/line-DGs clearly and appropriately define what the target group is for different objectives and priorities?
3. Are the objectives themselves specific, measurable and realistic?
4. Do the objectives distinguish between different kinds of effects such as knowledge raising, influencing attitudes/relationships or changing behaviour?

2) Choosing Communication Instruments

The choice of communication instruments is highly context specific. It depends on a number of considerations, but first and foremost of course on an understanding of the desired impact regarding one or more target audiences or stakeholders. Effects and target audiences need to be considered together, as both may require different criteria of

media choice: For instance, television may reach a large number of people, but is not suitable for carrying more complex messages or convey sufficient information in order to be useful to citizens. Similarly, using the national press may not be suitable to reach certain groups of stakeholders who use primarily regional media or specialised publications. The choice of communication instruments therefore needs to start from a clear understanding of what the communication objectives and target audiences are.

The next step in the process is the choice of instruments which should be drawn from a large toolbox. The larger the toolbox of suitable and flexible instruments is and the higher the awareness of the relative strength and weakness of these tools, the more likely a positive outcome is. Using the same tools out of habit or established practice or because superiors like it are not good practices. Ideally therefore an organisation should provide its communicators with a broad and workable toolbox of communication instruments and the decision-makers need to be fully aware of the relative merits of these instruments or have the ability to gain advice from the centre on using different instruments.

While there are occasionally lists published by PR practitioner that assign specific communication means to objectives, it is generally agreed in the literature that such assignment has little practical value. It may indeed be harmful, because it suggests that the selection of means requires no specific adaptation to situation and stakeholder groups. However, practitioners agree that media have specific strengths which can be exploited – given that the medium is capable of reaching the intended audience, carrying the message, and so forth. Several authors have published lists which juxtapose each medium's strengths and weaknesses (see, e.g., Graber, 2003, p. 239).

Nevertheless, disagreement over the utility of some communication tools remains. For instance, some authors believe the internet is suitable for raising awareness (Sheehy, 1997), stressing its far reach and “assum[ing] there is an audience ready and waiting” (White & Raman, 2000, p. 406); others, however, insist that only those who are already aware can be reached through the internet, because it requires user activity. They rely on media wherein messages are easily “encountered” by people even if these had not been searching (Schönbach & Lauf, 2004). Aside this elaborated reach-concept, other main aspects of media strengths are the ability to carry complex messages (which, e.g., TV lacks), typical depth of user involvement (high for online or magazines), repeated exposure, channel credibility, control over messages, and of course costs (Graber, 2003; Marcella, Baxter, & Moore, 2003; Schönbach & Lauf, 2004; White & Raman, 2000).

The next consideration in the process of instrument selection should be an assessment of the cost-benefit ratio of different tools in the context of the available budget. Is it worthwhile to go for a 40,000 Euro video news release (VNR), the preparation of a report for Futuris on Euronews, or a clip for EU-Tube? Unfortunately, there is no easy way of answering this question without considering target audiences. One can, however, put a monetary value on the value of air-time on television if brought for advertised and compare it with the air-time reached indirectly by television stations incorporating pre-packaged materials such as VNRs. One can also compare the different reach of different communication media, including certain television channels, internet websites etc.

Related figures are easily available, but they do not tell the whole picture about impact, nor do they always help to make an informed choice on a given communication instrument in a given situation.

When thinking about cost-benefit of communication tools, one should keep in mind that a more useful indicator than absolute costs or man hours, however, is costs per achievement (This needs to be distinguished from costs per output, which says nothing about impact, and might even be an indicator for hasty, low quality work; Gelders, 2005; Töppich, 1992). Again, a comprehensive evaluation of communication impacts is mandatory to get a realistic picture (Fleisher & Mahaffy, 1997).

It is difficult to put numbers to communication impacts, especially monetary values. Research consequently recommends a more comparative approach based on benchmarking. Comparisons with similar programs, also within the same organization, serve to give an idea of good and best practice (Brüggemann *et al.*, 2006; Noble, 1999). Such comparative evaluation, however, requires similar standards of evaluation and measurement across different departments, and easy accessibility of evaluation data. For benchmarking purposes, it is recommended to develop a handful of key performance indicators in communication (Besson, 2004; Lautenbach & Sass, 2006b). Such indicators can aggregate detailed information from evaluations, and give an impression of the most important aspects of the communication process. They should cover data on all important dimensions, including goal attainment, communication impact/effectiveness, relationship quality, process-efficiency and cost-efficiency. Please see also the evaluation section for more.

The professionalism of the person, a background in marketing and communications and of course his/her own experience with previous instruments is a key determinant for success in choosing the right communication tools. An organisation should thus make sure that it has the right people at the right place to take those decisions and ensure that communication professionals, especially in marketing and strategic planning, regularly exchange views about what has worked well and what has not worked so well. The most cost-efficient tools are often those that arise out of a creative process, which exploits opportunities for tagging on to news events or co-operating with other external partners who have a shared interest in spreading a certain message. Throughout our interviews we have come across several of such examples, for instance, promoting physical exercise through UEFA (DG Sanco) or spreading awareness of 50 years of the Treaty of Rome through a football match between Manchester United and a European selection. Both activities reached millions of viewers with very little budgetary efforts (especially compared to what ads would have cost) and were generally in line with the objectives.

It should be also noted that an organisation may prohibit or restrict the use of certain communication tools because of principled concerns or fear of being labelled propagandist. Public bodies spending tax-payers money on 'informing citizens' may feel that tools that blur the boundary between content producers and journalists (such as VNRs) are inappropriate or that they want to clearly distinguish themselves from commercial firms by not choosing marketing techniques that appeal to emotions and instincts rather than reason. Setting those rules is ultimately a political decision - but

one that should take into account that certain types of communication objectives can only be reached at reasonable costs by using certain instruments.

Key Questions

1. Is the choice of communication instrument clearly related to a) target audiences and b) intended effects?
2. Are communicators aware of the relative strength and weakness of different media/tools of communication? If not, can they rapidly gain access to such expertise within the organisation, for instances, by accessing data-bases with best practices?
3. Does the choice of communication instruments adequately reflect the relative cost-efficiency-ratio of different communication tools? Are opportunities for attachment to news events or partners exploited?
4. Are budgetary and human resources constraints/requirements adequately taken into account in the choice of communication instruments?

3) Allocating and using resources efficiently

At a general level, two resources are available for communication activities: financial and human. Both resources are to a certain extent interchangeable and mutually dependent, for instance, when a DG decides to hire external contractors for certain tasks that would overtax in-house staff, or when the performance of communication tools such as TV ads or public information campaigns depends on appropriate expertise of existing staff about market prices and working methods of PR firms. In addition, there is the issue of the right allocation, re-allocation and centralisation of resources within the organisation in order to ensure economies of scale as well as flexibility depending on the objectives (see also co-ordination section).

The overall financial resources should be appropriate to meeting the communication objectives. If the goal is to raise citizens' awareness of the risk of smoking to a certain level and even induce behavioural change, a well resourced and sustained public information campaign, including the buying of airtime, is necessary. Communication objectives in term are usually related to and derived from political objectives. Classical cases for governmental information are consultation and advocacy objectives with regard to new legislative initiatives or informing consumer and stakeholders about the implications of decisions and laws.

How can one decide whether the budget available for external communication activities in the Commission or individual DGs is appropriate to the task? Given the lack of specificity in the Commission's overall communication objectives this question cannot be reliably answered. One can, however, use different indicators as proxies for communication needs at the level of citizens. These could be the sheer number of planned or recently agreed legislative initiatives and their regulatory depth and reach. Or one can start from the results of public opinion analysis about the areas of policies where citizens are least knowledgeable, but most interested to learn more. At the national level the resources for communication departments reflect as much the 'objective

importance' of certain ministries (Interior, Finance, Defence), but also the political bargaining power of its ministries. In Germany, for instance, the communication department grew by 150 percent between 1998 and 2006, while other departments shrunk. The reason was that the good performance of the Green Party headed by the Foreign Minister Joschka Fischer in 2002, meant that he good additional resources, including units from other ministries.

Good organisational practice with regard to human resources management in this policy area requires the hiring of specialists for different communication functions. There is no such thing as 'the communication professional', but many specialists with quite different skills and expertise such as spokespeople, speech-writers, editors, copy-editors/proof-readers, marketing specialists, strategic planners, web and graphic designers, event-managers, networking specialists etc. Where such staff is not available or particular technical expertise is required, an organisation should develop the skills of staff through tailored and long-term training measures. These measures should be encouraged. Moreover, high performance in communication needs to be rewarded by the institution and individuals must be given a career perspective when showing good performance and further developing their skills. If communication is seen as low priority by the hierarchy and not rewarded, it will be difficult to attract specialists and keep the accumulated expertise of current staff.

Key Questions

1. Does the Commission have the sufficient financial and human resources (including expertise) to reach its objectives? Is the resource allocation in sync with the prioritisation of communication objectives?
2. Does the Commission have the right kind of personnel to discharge various communication tasks effectively? Does it have an effective training programme in place to develop the skills of existing staff and does it motivate staff by rewarding good performance?
3. Are the human resources allocated in a way that allows discharging these tasks most efficiently and effectively (e.g. the balance between centre, DGs and support services). Does the Commission have sufficient flexibility in allocating human and financial resources to different tasks depending on their present or anticipated importance to the institution and stakeholders?
4. When contracting out communication tasks is the Commission able to get the best kind of service at the best price on the market, and exercise sufficient control to ensure that it gets precisely what it wanted?

4) Evaluating communication: strategy & methodology

Evaluation is of key importance for the success of an organisation's communication activities – not least for the purpose of rewarding staff that has performed well and thereby built a dedicated team of communication professionals across the institution.⁸⁵

⁸⁵ It is worth noting that reward through evaluation can also become counter-productive when staff become overly reliant on well-known methods and stop experimenting and exploiting new opportunities.

The more immediate concern of evaluation activities is however to verify that observed effects can be traced to communication activities. It is useful not only to examine whether ultimate objectives are met, but also to keep track of the intermediate levels of evaluation (Gregory, 2001). If a program fails, knowing whether information was not issued appropriately, insufficiently disseminated, or rarely retained, considered or acted upon makes all the difference for planning further communication (Paine, 2001). Literature therefore recommends conducting evaluation as both backward-looking (“summative”) (verifying success) and forward-looking (“formative”) evaluation (i.e. tracking the process and drawing conclusions for further strategy formulation) (Gregory, 2001; Noble, 1999). The most advanced approaches evaluate not only all main stages (output, outgrowth and outcomes), but also the efficiency of the internal work process (conceptualization, drafting, authorization, and implementation; Pandey & Garnett, 2006) as well as the organizational learning process (using evaluation feedback on the different levels). However, given that resources for evaluation are finite, the choice which and how activities are evaluated depends on the goal pursued with the evaluation (Fleisher & Mahaffy, 1997; Watson & Noble, 2005).

Methodologically, different goals imply somewhat different approaches for evaluation (Fuhrberg, 1995). In order to check whether (or demonstrate that) objectives have been met simple statistical evaluation is usually sufficient, provided the indicator is sufficiently validated. To assess the impact of communication, a more differentiated quantitative approach is recommended, taking into account the different outcome levels. For an analysis of the process of communication, qualitative approaches may be most valuable (Besson, 2004). For formative-only evaluation, experimental pre-testing of messages is a common approach (Freitag, 1998). The latter two are particularly valuable when new programs are devised, or if failures of existing programs are investigated (Besson, 2004).

Valid communication evaluation suffers from a paradox: The more suitable a measure is to indicate relationship quality, the less clear is the link to concrete communication activities – and the more difficult is the collection of data (Watson & Noble, 2005). There are strong incentives to use measures from the lower levels of outcomes (for instance, output and outgrowth) to assess objectives located on the higher ones (Gregory, 2001). Evaluation practice needs to be careful about two core sources of error:

Validity. There needs to be a clear link between the indicator and the evaluated objective. A suitable approach to secure validity of indicator is to conduct a qualitative evaluation of measures before surveys are conducted (Grunig & Grunig, 2001).

Relevance. An indicator needs to be related to communication activities in some plausible way, while possible disturbances are taken into account. Particularly when using more advanced measures, evaluation needs to be aware of other influences that inflate or depress the effects of the evaluated communication measures. Evaluation not only requires that objectives are met, but also that those measures employed were instrumental in achieving them.

One more finesse in utilizing such indicators for evaluation is to include them in so-called balanced scorecard systems. These “scorecards” pursue three main purposes:

- to juxtapose performance indicators from different aspects of communication, ensuring that improvements along one dimension do not come at the expense of another dimension (Besson, 2004)
- to include also “soft”, artificially quantified indicators alongside classic quantitative indicators (Lautenberg & Sass, 2006a; Pfannenberger & Zerfaß, 2004)
- to integrate summative evaluation (using the indicators as success measures), formative evaluation (using them as optimizing tool), and strategic program development (allowing to formulate key objectives in terms of key indicators) (Besson, 2004; Hering, Schuppener, & Sommerhalder, 2004; Zerfaß, 2004)

Many researchers and practitioners offer ready-to-use question batteries and auditing checklists which can be utilized for the development of tailored evaluation tools (see, e.g., Besson, 2004; Grunig & Hon, 1999; Töppich, 1992). Albeit designed mostly with private sector organizations in mind, the focus on stakeholder relations is sufficiently general, while outcome measures are sufficiently specific, to be easily transferable also to the EU context. Some other recommendations for evaluation practitioners, which are meant to save money and efforts, can be listed as follows:

- Use secondary analysis and data that is available elsewhere (but make sure the data you use is current and the indicators are valid and relevant) (Grunig & Grunig, 2001).
- Piggyback, get your survey questions aboard others’ existing surveys (Grunig & Grunig, 2001).
- Use smaller samples; there is no need for 1000 respondents in order to know whether a communication measure, in principle, works. Unless there is a reason to expect different reactions from different publics, there is no need for stratified sampling (Grunig & Grunig, 2001).
- Often, very small qualitative investigations can deliver valuable, detailed insights – e.g., why messages were rejected, or what aspects were valued most (Holloway, 1992).
- Do casual low budget evaluation, such as leaving questionnaires at events (or even press conferences). Even low response rates often suffice to see whether actions were appreciated, and what could be improved (Eisenmann & Delahaye Paine, 2007).
- Evaluation can be an asset for communication departments even if success is sub-optimum. If systematic evaluation can trace problems in otherwise successful programs to understaffing or lacking resources, you can make a much better case for acquiring larger budget shares than without evaluation.

Key Questions

1. Does the Commission routinely undertake, fund and encourage ex-ante and ex-post evaluations of communication activities?

2. Do the indicators used in evaluations allow for measuring objective achievement and impact with sufficient relevance and validity, and do they conform to the effect levels targeted in the objectives?
3. Are the decision-makers aware of the relative strength and weaknesses of different evaluation techniques, including cost-benefit ratios?
4. Are the results of evaluations fed-back into not only future communication programming, but also staff recognition, future problem-definition and objective setting?

5) Coordinating & structuring of communication activities

One should also note the close relationship between what an organization does and what it communicates. We will return to this issue under the issue of co-ordination. Suffice to note at this stage that there should be constant synchronisation and co-ordination of what the Commission does and plans to do, and what it communicates on. Both activities are mutually dependent as legislative action may be misdirected if it is based on an erroneous understanding of the problem perceptions of the stakeholders affected by a policy. Listening and consulting with these stake-holders can and should be an objective of communication activities as an intrinsic part of the public policy process, not a completely separate activity or an afterthought to policy-making

Regarding the alignment and internal structuring of communication departments – task formulation and division, management coordination etc. – there are more different philosophies than coherent best practice guidelines (Graber, 2003). PR literature stresses that communication objectives, which later constitute the reference points for evaluation, must be already considered and formulated when management decisions or policies are developed. A close coordination of communication departments with ministry/DG leaderships seems mandatory for an integrated communication policy (Bentele, 1998; Gelders, Bouckaert, & van Ruler, 2007; Graber, 2003). A look at the organigrams of national ministries reveals different models, for instance, in the UK and Germany, communication units are often embedded in horizontal strategy units (planning units) and headed by Directors, Senior-Directors or Ministerialdirektoren. In France, there are also range of different models, but again, one can find the communication departments usually belong to horizontal services such as the General Secretariat in the French Ministry of the Interior. Given the Commission's unique setting, in which the political leadership (College and Cabinet) is not an integral part of the DG itself, such models are not directly transferable. What is relevant, however, is that communication units are usually conceived as horizontal services and are headed by an official of at least director rank.

Apart from intra-departmental co-ordination, literature in government communication emphasizes also the necessity to co-ordinate information centrally (Phillis, 2004). This is crucial, first of all, in order to avoid double or contradictory communication and to secure synergies. For instance, savings in the area of buying advertising space can be made by centralising some of these functions and thereby increasing buyer-power. The UK Central Office of Information (CoI) claims that it has bought advertising space 46 percent cheaper than the industry benchmarks, i.e. what is considered the standard price

for a small single company (CoI, Annual Report, 2006, p. 7). About 40 percent of its budget has been spent on advertising. The figure for the European Commission is likely to be substantially smaller than that, partly because of smaller budgets which do not allow such practice, partly out of political sensitivity surrounding the use of tax-payers money for buying airtime as a traditional marketing instrument.

Internally, central coordination allows coherent and steady inter-departmental communication, mutual learning and common standards for, amongst others, evaluation and benchmarking. Externally, this allows bundling and disseminating information according to the different needs of the users, who tend to care little for which sectoral departments happen to be involved (Gelders, 2005; Terrill, 1994). This means that instead of treating a new piece of legislation that affects different audiences as a single ‘message’, it would be much better to communicate different aspects separately if they affect different audiences, such as consumers and industries. Bundling is also useful when it draws together relevant contributions from different DGs regarding a similar problem-area, for instance, drawing up guidance on cross-border services with information about competition rules, labour and social security, tax etc.. The underlying principle is to conceive communication from the perspective of stakeholders’ needs, not those of the sender (see also section 1.3.). Beyond appearing as a unified actor towards the public, central generalist gate keeping allows actively defining priority topics and core stakeholder groups, thus actively setting the public agenda (Ruhstroth-Bauer, 2003). In addition, a coherent ‘corporate design’ can reinforce the visibility and identifiability of a public body with the general public (less with specialist stakeholders).

The organizational implication of the need to maintain close coordination with both sectional decision makers (for internal efficiency and effectiveness), and other sections’ communication activities (for external impact and strategic prioritization) is that sectional communication departments need to be linked through an efficient central structure of coordination (Sheehy, 1997). Objectives, priorities and relevant background information must be communicated efficiently, first of all, amongst all participating communication staff. The communication department staff’s commitment is crucial for sustainable communication practice. Frictions within the organization’s communication department(s) – e.g., confusion about the organizational mission, difficulties in accessing information, deficient feedback mechanisms and other problems – can seriously affect the department’s external performance (Besson, 2004; Lindenmann, 1998; Pandey & Garnett, 2006). Coordination needs to be both decentralised (horizontal communication facilitated by common standards and institutional mechanisms) and centralised (generalist gate keeping, user-oriented editing and agenda setting). Suggestion from the literature include sectional liaison officers in the central department, a council of communication department heads (Netherlands, Rijnja, 2000; Volmer, 2000; see also Mahler & Regan, 2007), or an “editors’ conference”, where gathered information is exchanged and processed in a quasi-journalistic fashion (Germany). Another idea from Germany is an “agency” unit which serves as active information gatherer within the organization and as information provider and publisher for external publics (Ruhstroth-Bauer, 2003). Since most solutions have been described (usually by insiders) only just after their implementation, however, it is

impossible to learn from the literature which ideas work best. It is also worth remembering that co-ordination takes up resources that could be used for implementing external communication, so to use economic jargon, investing time in co-ordination is subjective to diminishing marginal utility. Ultimately, it is only useful in so far as the net-result is using the existing resources more efficiently. Striving for perfect co-ordination of messages would bring external communication to a stand-still

Key Questions

1. Is there an appropriate mechanism/process for aligning what the Commission wants to do in policy terms with its communication objectives?
2. Are there mechanisms in place to ensure that DGs make their appropriate contribution to the achievement of the priority objectives for the institution as a whole? Do these mechanisms ensure that thematic synergies across DGs are realised and overlaps and contradictions are avoided?
3. Are communication units/staff within line-DGs integral part of the horizontal decision-making and forward planning process?
4. Does the relationship between line-DGs and central service DGs allow for the most efficient and effective use of different communication tools

Annex 2.

Questionnaire on External Communication

Note to respondents: Due to the importance of the questionnaire for our study and the considerable time constraints under which the study is carried out, we would like to ask you to proceed in the following two steps:

1) Send back the questionnaire with the questions that you can answer easily as soon as possible (*until 10th of August at the latest*).

2) Send us back the fully completed questionnaire *until 3rd of September*.

At both times the questionnaires should be send to Ilaria.Maselli@ceps.eu.

This questionnaire has been sent to the information units of all DGs and services. If you consider that a question might not be suitable for your DG/service, please indicate clearly why you consider the respective question not applicable.

If you have questions, please do not hesitate to contact us at any time (Sebastian.Kurpas@ceps.eu). Thank you very much for your cooperation!

The CEPS team

1. Objectives

1. What are the most important **general objectives** for your DGs external communication activity? Please rank up to three in order of importance.

*(Objectives are considered **general** if they describe the overall communication aims of the DG. They should be distinguished from ‘**specific objectives**’ (see question 5) that should relate to concrete activities or programmes and be formulated in a way that criteria can be deducted in order to measure the success or failure of the respective activity/programme.)*

2. To what extent are they identical to or derived from the communication **priorities** identified by the College in the Annex to the Commission Work Programme 2007?
3. Could you give **examples** where the objectives have been of concrete relevance?
4. Concerning the communication activities/projects carried out by your DG:
 - a) Please list *all the main* communication activities carried out by your DG.
 - b) Please identify the three *most costly* ones in terms of budget.
 - c) Please identify the three activities which are *most time-consuming*
 - d) Please identify the three *most successful* activities in reaching your target audience and achieving your communication objectives.
5. Please list the **specific objectives** for each of the communication activities mentioned in question 4 b) to d).

2. Evaluation and monitoring

6. What kind of **indicators** do you use to measure whether objectives have been reached for each one of the above?
7. How do you **control & monitor** the performance *during* ongoing communication activities?
8. What is the proportion of communication activities over the last five years that has been subjected to **ex-ante and/or ex-post evaluation**?
9. How have you used the **results of such evaluation** to adjust objectives, allocate resources and choose tools? Please provide an example if possible.
10. What, if any, are the **criteria for prioritising** the funds allocated to the different communication activities of your DG?

3. Tools

11. Which communication **tools/instruments** do you consider the **most efficient** for reaching your objectives? Please provide a brief justification for each (e.g. TV, press or internet advertising, stakeholder events, workshops, brochures etc.).
12. What is the **relative importance of each of the communication tools** used? Please provide as far as possible figures for the overall resources and the percentage of resources linked to specific tools.

4. Resources

13. Are the **financial resources** adequate to reaching your objectives?
14. If not, please elaborate briefly in which areas the **main shortfalls are and why**?
15. Are the **human resources** employed for communication adequate for reaching the objectives:
 - a) in terms of number?
 - b) in terms of qualification?
16. What proportion of your communication active staff has a **professional background in communication** (i.e. either through a directly relevant University degree and/or three years of work experience in a job with primary communication responsibilities)? Please indicate an approximate relative share for each.

5. Audiences

17. If not already answered in previous questions, what are your **primary target audiences**?
18. What specifically do you want to **achieve** with regard to these audiences? (e.g. raising awareness, improving knowledge, access to information, reinforcement or changes in attitudes, opinions, behaviour in varying respects)
19. Do your communication activities also aim at the **broader public**?
20. Do you see your **immediate target audiences** as the primary addressees or primarily as communicators/multipliers for the broader public?

21. If your immediate target audience is (also) meant to act as multipliers for the broader public, do you have **any indicators/measures** whether they actually act in that way?
22. If possible, please provide use with any data/evidence you have about the **impact** of communication activities with regard to your most relevant audiences.

6. Internal Coordination

23. Please provide a short assessment of the contribution/added value of the following **Commission services** to your work (DG COMM, DGT, SCIC, OPOCE, DIGIT), for instance in providing relevant information, choosing and deploying tools, evaluation and control.
 - a) DG COMM (HQ and Representations)
 - b) OPOCE
 - c) DGT, SCIC, DIGIT
24. With respect to support from Commission services, where do you see the biggest **room for improvement**?
25. What are the most **relevant DGs you co-operate** with? Please provide some examples of successful co-operation.
26. What are the **factors/or examples which negatively affect the efficiency** of your communication activities **due to a lack of co-ordination** with other DGs?
27. What are the **factors/or examples which negatively affect the effectiveness** of your communication activities **due to a lack of co-ordination** with other DGs?
28. How do you see the **added value of the External Communication Network** to your work?

7. Cooperation with external partners

29. Are there "**partners**" / **interlocutors outside** the Commission (e.g. national authorities, NGOs, the media, PR agencies) who play a significant role in the implementation of your communication activities? If so, please briefly **describe them** and the **cooperation mechanisms** you use.
30. Please list your **three main external partners** in reaching your target audiences in the order of their importance for your external communication.
31. Approximately how much **financial and human resources** are devoted to activities in cooperation with the each of the three main partners per year?
32. How could cooperation with these external partners be **improved**?

8. Potential for general improvement and further sources of information

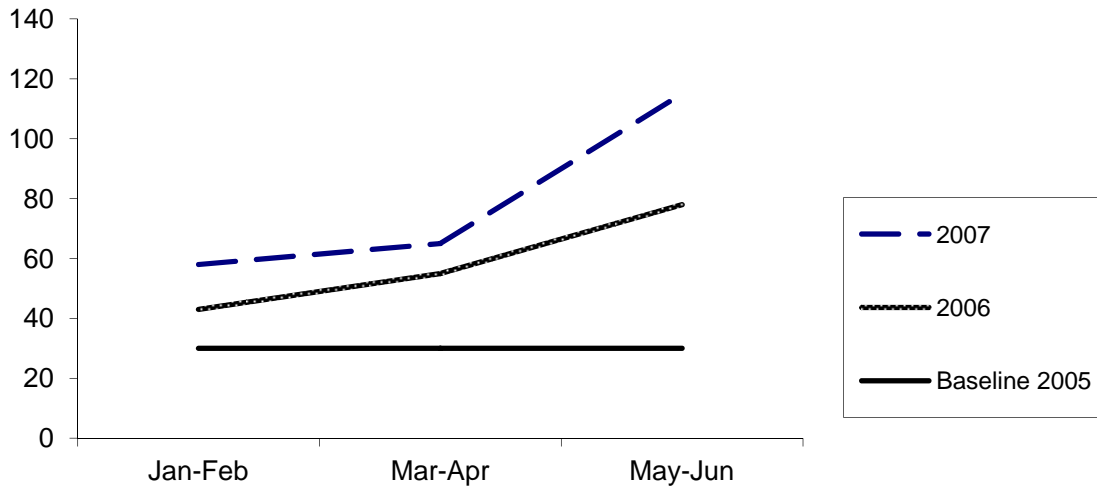
33. On the basis of your experience, which **actions/measures/structural changes** would **most improve** the efficiency and effectiveness of your DGs external communication?
34. Can you please attach any **evaluation or impact studies** of your communication activities (final, interim or even draft), which may be helpful to our research.
35. If evaluation studies are ongoing, please indicate whether someone involved might be willing to talk to us.

Annex 3

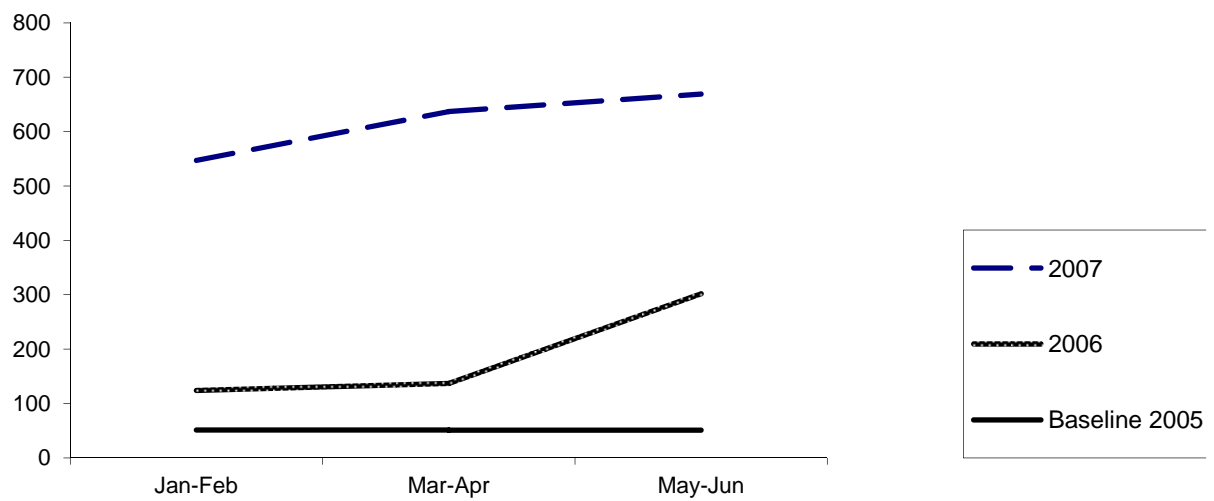
Annex 4

Pilot Representations Activities, 1st Semester 2007

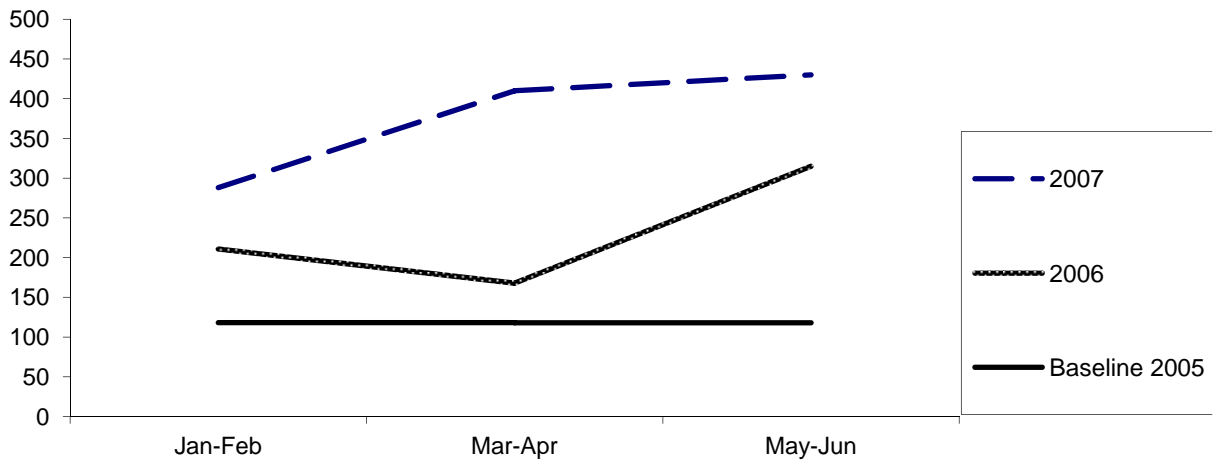
1 Press Conference



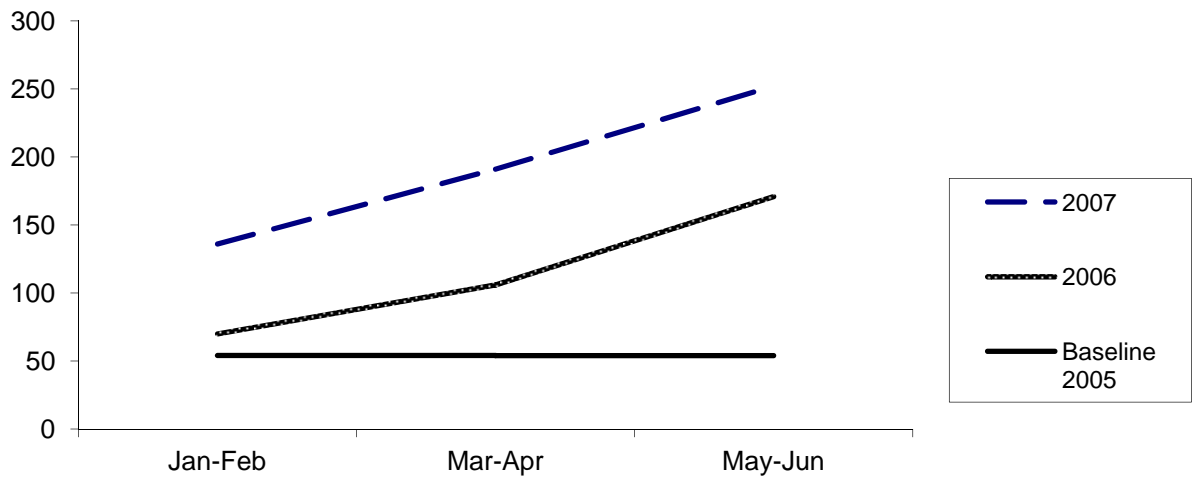
2 Participation in media events



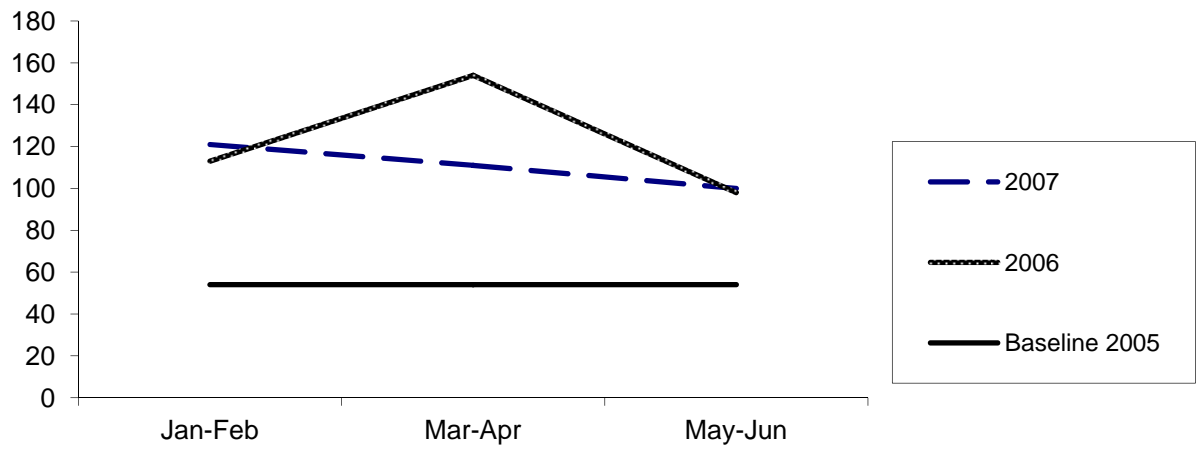
3 Meetings, Presentations and Openings



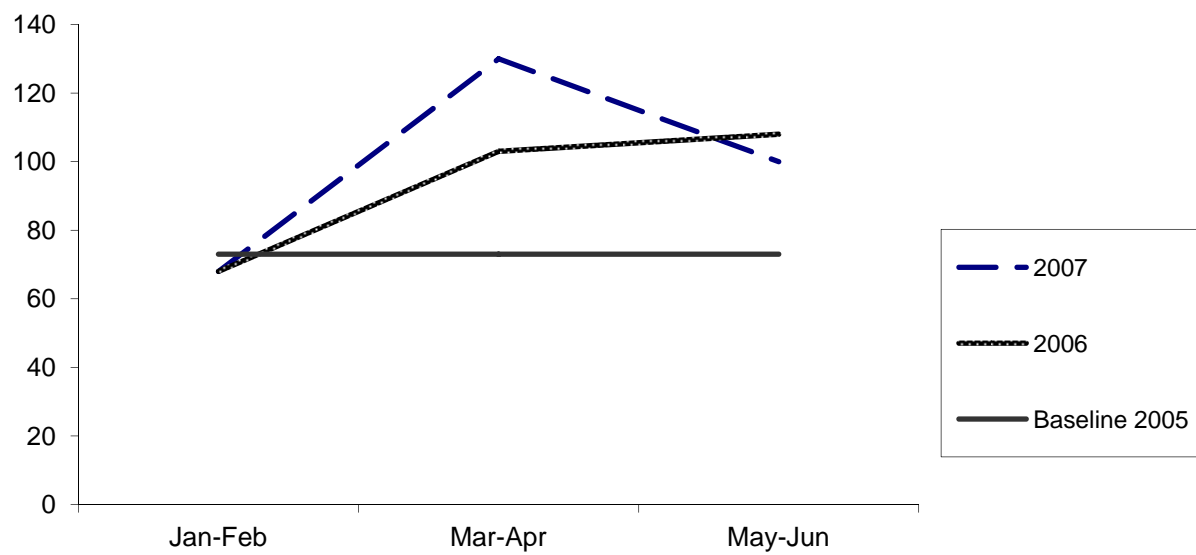
4 Thematic seminars



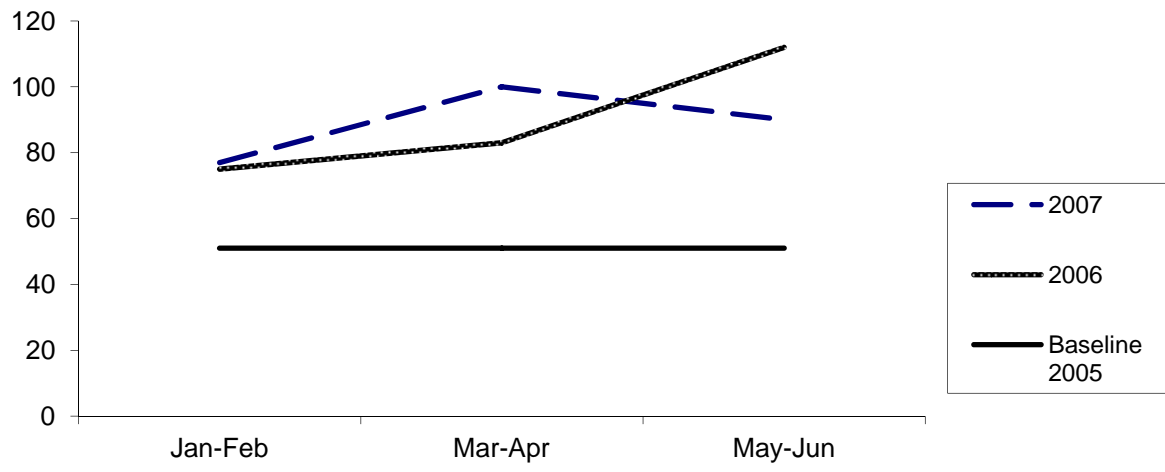
5 Meetings with local authorities



6 Meetings with national authorities



7 Institutional events



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