The Expansion of Junk Food Marketing, Cyberspace, and Children’s Waistlines: Government Public Relations Combating Childhood Obesity in Hungary and the United Kingdom

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ABSTRACT

With mass-produced food heavily promoted to children, governments worldwide have grappled with the obesity epidemic by regulating marketing by food manufacturers and launching educational programs to the public. Non-governmental organizations and consumer advocacy groups also have been monitoring the government and the food industry with increased scrutiny, while undertaking public relations activities to motivate the public and put pressure on governments. Concurrently, the food and advertising industries have been defending their activities. Europe also battles the expanding waistlines and sedentary lifestyles of children and the promotional activities of junk food producers in an Internet-savvy population. Our paper analyses the reactions and public relations activities of the governments—and NGOs and the food and advertising industries that influence the governments and public opinion—in Hungary and the UK, two countries representing a Western and Eastern European perspective. Hungary represents Eastern Europe as an emerging market, post-communist society, facing less, but growing, childhood obesity and Internet penetration, and new promotional measures under discussion. The UK was selected as an ideal country representing Western Europe due to its escalating obesity crisis, rising Internet use among children, sophisticated media marketplace, recent government-imposed regulations on junk food geared to children, new social marketing campaign, and growing consumer advocacy initiatives.
"Globesity," a new term describing the global obesity epidemic, applies not only to adults but to children, who have been impacted by the poor eating habits and sedentary lifestyle of adults at an alarming rate—and are now facing diet-related health consequences from diabetes to cancers. With 177 million school-aged children under 18 clinically overweight or obese (Consumers International, 2008a)—and approximately 22 million children under 5 overweight worldwide, childhood obesity is becoming a serious issue (World Health Organization, 2010). Studies conducted by the World Health Organization (WHO) communicate two trends: an increase in the rise of global diet-related noncommunicable diseases and an increase of the consumption of junk food (Hawkes, 2002). Aggressive worldwide marketing activities by global junk food and non-alcoholic beverage brands have adopted a "glocal" marketing strategy, utilizing the "5Ps" of marketing: Place, Price and package, Product expansion, Promotional activities, and Public relations (Hawkes, 2002).

Governments worldwide have been combating the obesity epidemic by regulating marketing by food manufacturers and launching public educational campaigns. Non-governmental organizations, consumer advocacy groups, and charities also have been monitoring the government and the food industry with increased scrutiny, while undertaking public relations and marketing activities to motivate the public and put pressure on governments. Concurrently, the food and advertising industries have been defending their marketing strategies through trade associations for advertisers and food manufacturers. Western and Eastern Europe also battles the expanding waistlines, sedentary lifestyles of children, and the promotional activities of junk food producers in an increasingly Internet-savvy population.

This paper focuses on two distinctly different European Union countries both combating childhood obesity: Hungary and the UK. We examined public relations and integrated marketing communications campaigns of government entities in health and communication, the advertising industry, food manufacturers, non-governmental organizations, and consumer advocacy groups over the past five years. Each sector incorporates various persuasive strategies, from motivational to social appeal, to communicate with different constituents, many with contrasting opinions. Yet each audience shares the same triggered events: growing childhood obesity and widespread Internet access among children, with new creative online “playgrounds” by junk food marketers, such as advergames (see Figure 1).

SECTION I: INTRODUCTION

SECTION II: COMBATING CHILDHOOD OBESITY IN HUNGARY AND THE UK ESCALATING CHILDHOOD OBESITY

The expansion of children’s waistlines is a serious issue in both Hungary and the UK. Childhood obesity has increased in Hungary by 60% between 1999 and 2007 (HCSO, 2008). More than 50,000 children, approximately 3% of the population under 18, were registered in the Hungarian national healthcare system with obesity resulting from imbalanced caloric intake in 2007, and the number of overweight and obese children who are not registered is even higher (HCSO, 2008). The growth, close to 80%, was the most significant among children under the age of 3 (HCSO, 2008). School children between the ages of 7 and 14 are also greatly affected—one out of five living in Budapest, the capital of Hungary, was found to be overweight, with 3 to 4% obese (Szűcs, 2007). In the UK report, "Statistics on Obesity, Physical Activity and Diet: England, February 2009," issued by the National Health Service Information Centre for Health and Social Care, 17% of 2- to 15-year-old boys and 16% of girls in the same age bracket were classified as obese in 2007, an increase from 11% and 12% respectively in 1995 (National Health Service, 2009).

TELEVISION AND INTERNET USE AMONG CHILDREN

While the regulation of television advertisements is the focus of current debates globally, youth in Hungary and the UK are spending an increasing amount of time using new media technologies and pursing sedentary activities, such as TV viewing. The most popular free-time activities of young Hungarians between the ages of 15 and 29 are watching television (65-68%) and using computers (54%). Among this age group, the amount of time spent watching TV on weekdays decreased by 25% (from 143 minutes to 107 minutes a day) between 2004 and 2008 (Szabó & Bauer, 2009). Media consumption habits of the 15- to 29-year-old generation have changed dramatically due to accelerated Internet penetration. In Hungary almost every second household has a personal computer and Internet access, and one sixth of the households had broadband Internet access in 2008. In spite of the latest developments, Hungary is still lagging behind Europe, where the Internet penetration is more than 60%, the penetration of broadband connection is above 20% (Eurostat, 2009a; 2009b). According to recent data, one fifth of children under the age of 15 constitute the daily users, and half of them go online to play and download games, images, films, or music (Eurostat, 2009c; 2009d). Among those children under 14 who have Internet access at home, 80-96% use the Internet for playing games. One fifth of the children under 6 and 80% of the children between the ages of 11 and 14 use the Internet without parental control (NRC, 2007). Half of the children using the Internet already click on banners; 13% of them engage in shopping as a result of an Internet advertisement (NRC, 2007). According to the survey of Szonda Ipsos (2008), despite the changing patterns, watching television still leads free-time activities. Children between 8 and 14 spend more than two hours in front of the television every day and 77 minutes in front of the computer, half of which is spent on the Internet. Children between 8 and 11 spend 23 minutes using the Internet per day. At the same time, healthy lifestyle activities, such as sports, are less prevalent among

Figure 1: Hungarian Nesquik Advergame
the youth. One third of the children between 8 and 14 plays computer games every day, while only 17% play sports daily.

According to a report by ChildWise, a market research agency on youth and their families in the UK, the proportion of children, ages 7 to 16, who have Internet access in their own rooms, has increased from a quarter in 2008 to two-fifths in 2009 (Childwise, 2009). In fact, 25% of 5-year-olds have Internet access in their own rooms (Curits, 2009), and almost all 5-16-year-old children now have a personal computer or laptop at home, and more than 50% own their own computer (Childwise, 2009). Children’s bedrooms in the UK are becoming private "multi-media centers," with a personal computer or laptop with Internet access, mobile phones, television and other electronic devices, such as MP3 players and digital cameras. Children, ages 8 to 11, average four media devices in their bedrooms, and those ages 12 to 15 own six (Ofcom, 2008). In fact, mobile phone ownership is growing in the UK, with one in three children under 10 owning a mobile phone, according to mobileYouth, a research consultancy, raising additional concerns for parents unable to provide supervision (Judge, 2008).

REGULATORY ENVIRONMENTS

Advertising to children is a growing business in both countries as well, with regulatory issues under debate in Hungary and new regulations being enacted, as in the case of the UK. An average Hungarian child between the age of 8 and 14 spends approximately 16 USD per month, which amounts to over 13 million USD per year (Szonda Ipsos, 2008). The greatest part (25%) of children’s pocket money is spent on sweets and soft drinks, but children not only have their own choices on what they buy, they also influence family purchases. According to recent national surveys, 70% of children have a say in the brand of groceries bought by the family (Szonda Ipsos, 2008). In 2008, nearly 10% of television commercials targeted children, a total of over 156,000 spots (personal communication with AGB Nielsen, 2008).

There is no legal regulation that would control the promotion of unhealthy food to children in Hungary. Advertising to children is only prohibited if they can damage children’s physical or mental development, if they build on their inexperience and gullibility, or if they urge children to incite adults to buy products or services (Act XLVII of 2008 and Act XLVIII of 2008). Restrictions on the advertisements of certain product groups pertain only to advertisements of alcoholic and tobacco products to children. The same regulation prohibits advertising in institutions that provide basic and specialized child-protection services, kindergartens, elementary schools, and dormitories housing elementary school children. However, an exemption is provided for advertisements promoting healthy lifestyles or environmental protection. In such cases, the name and logo of the sponsors may appear (Act XLVIII of 2008). This way the Act enables junk food companies to promote healthy lifestyle programs in educational institutions, even if their core activity is producing junk food (e.g. sport programs of beverage companies with their brand identities appearing).

The Code for Advertisement Ethics, the main self-regulatory document, approved by the members of the two main industrial alliances (Hungarian Advertising Self Regulatory Board and the Hungarian Advertising Association) suggest that food and beverage producers should not use cartoon figures for promotional purposes in a way that may blur the line between commercial and editorial content. The Code also states that while using the imagination of children is acceptable, advertisers should pay attention to not use it in a way that may be misleading about the nutritional value of the products promoted (MRSZ, 2009).

In the UK, the Food Standards Agency (FSA) sponsored the Hastings Study, a report that confirmed a connection between advertising and childhood eating—their preferences, purchasing behavior, and consumption (Ambler, 2006)—and sparked a dialogue among the government, food industry, and the public. Both the Department of Health and the FSA identified television advertising of unhealthy foods to children for future restrictions, which prompted the Secretary of State for Culture, Media and Sport to request action from the Office of Communication (Ofcom, 2007), which serves as an independent regulator and competition authority in the UK’s broadcasting, telecommunications, and wireless communications industries. Ofcom introduced progressive advertising restrictions of food and non-alcoholic drinks products, containing high fat, salt, or sugar (HFSS), according to the nutrient profiling scheme defined by the FSA. Scheduling restrictions rolled out in stages, applying to all channels transmitted by UK broadcasters: a ban on HFSS television advertisements in or around programs made for children or ones of particular appeal to children, ages 4 to 15, and the final phase of scheduling restrictions began January 2009 when dedicated children’s channels were required to remove HFSS advertisements (Ofcom, 2007). Content rules also covered an advertising ban on use of characters and celebrities, restrictions on promotional offers, and accuracy in nutritional and health claims of HFSS products that target pre-school or primary school children (Ofcom, 2007).

The more stringent regulations on television advertisements have prompted more food companies to invest in marketing on the Internet, an unregulated terrain (Andrews, 2007). As a result, many companies have set up advergames and online fan zones, which heavily promote their products and brands. The body responsible for advertising codes, the Committee of Advertising Practice (CAP), comprises “advertisers, sales promoters, direct marketers and interactive advertisers, agencies and media owners” (Advertising Standards Authority, n.d., para. 25). Its non-broadcast division is responsible for all other forms of advertising (except radio and television), sales promotion, and direct marketing. A loophole in the code of conduct classifies editorial content as exempt, which applies to branded Web sites and their games and promotions (Taylor, 2008). The chairman of the Advertising Standards Authority, which is responsible for enforcing but not writing the rules, has "already expressed his frustration that his body cannot crack down on many of the ‘advertorial’ websites on the Internet" (Wallop, 2008, para. 9).
During the last decade, the Ministry of Health in Hungary has repeatedly identified obesity and, more specifically, childhood obesity as a serious problem, but obesity prevention has not been among the priorities of the government. While several national campaigns were launched between 1995 and 2007, only a few of them targeted the younger generations (EUM, 2008). While the Hungarian government recognizes the importance of health communication in realizing its programs, its health communication is mainly targeted towards professionals (dietitians for example) or to a small target group. Most of the health-related communication campaigns promote screening and early recognition of cardiovascular diseases, breast cancer or cervical cancer. Over the past few years, PR activities have not addressed a healthy lifestyle to curb the obesity problem and to reach a wider audience (Szőke, 2009).

The Nutrikid, an independent non-governmental program that started in 2002, has reached 10% of the student population in 2,500 elementary schools with a book and teachers’ guide that introduces the principles of healthy eating (Nutrikid, 2010). However, the program is quite controversial since Nestlé, one of the junk food giants, sponsors Nutrikid and the food manufacturer’s logo appears on the educational materials, even though advertising in school buildings is prohibited by law.

An important recent development regarding children’s healthy nutrition was a decree issued by the Minister for Education in 2005 ordering school cafeterias and buffets to make their assortment healthier (OM, 2005). More than 1,000 school buffets and canteens were examined by the Hungarian National Public Health and Medical Officer Service a year later, and in those counties where an information campaign had been delivered, with the involvement of parents and kids, about two thirds of the buffets had a healthier assortment, while in other counties it was under 50% (TÁRKI, 2007). Two significant attitudes dominate Hungarian health policy discourse: the first focuses on changing the settings by changing the institutions where children spend most of their time, while the second approach prefers the promotion of healthy lifestyles rather than trying to restrict diets (OGY, 2003).

In the UK, Prime Minister Gordon Brown stated in a report, "Healthy Weight, Healthy Lives: A Cross-Government Strategy for England," issued by the Department for Health and the Department of Children, Schools and Families: “Our ambition is that by 2020 we will not only have reversed the trend in rising obesity and overweight among children but also reduced it back to the 2000 levels" (Department of Health [DH] & the Department of Children, Schools and Families, 2008, p. xi). Launched in January 2008, “Healthy Weight Healthy Lives” is a £372 million cross-government anti-obesity program with a first-step priority on children supported by a £75 million marketing campaign (DH, 2008). The DH hired London-based Freud Communications—the same public relations agency handling Nestle, PepsiCo, Mars, and KFC—to promote its preventative Change4Life: Eat Well, Move More, Live Longer campaign as part the national anti-obesity effort. This appointment has received some skepticism. A spokesperson for Sustain, a food charity, said, "Freud and the Government have to show they are really independent in how this campaign is run" (Cartmell, 2008, p. 3).

The multifaceted Change4Life campaign debuted in January 2009 as the “first national social marketing campaign designed to prevent obesity in England” with a “preventative, not remedial” approach (DH, 2010), with a first-year focus on reaching families, mostly mothers, and children ages 5 to 11. The campaign has involved the government, schools, businesses, and communities, as well as the support of other charities, including Cancer Research UK, Diabetes UK, and the British Heart Foundation, and food and drink manufacturers. The Advertising Association created a consortium contributing £200 million over the next four years primarily from junk food producers, such as Coca-Cola, Kellogg’s, Mars, and Nestlé, that allows them to place Change4Life logos on their packaging (Lepper, 2008b). A series of sub-brands educate parents and children about healthy living with active lifestyle themes—Walk4Life, Bike4Life, Swim4Life, Play4Life, and Cook4Life.

Other government departments also provide support to families on diet-related health issues. The Department for Children, Schools and Families also operates a Sure Start program with 3,500 children’s centers slated by the end of 2010 (Department for Children, 2010), along with events and handbooks covering diet and nutrition. The School Food Trust hired a public relations agency to rebrand school dinners through a consumer campaign and media relations to reach parents and other stakeholders (Magee, 2009). The Department for Culture, Media and Sport, which is responsible for numerous government policies, maintains an Education and Social Policy division, covering education for children, young people, and families. A spokesperson for the Department for Culture, Media and Sport commented about the tighter advertising restrictions in a BBC interview: “We must have a proper opportunity to assess the impact of these new rules, which are amongst the toughest in the world, before considering further restrictions. Restrictions on advertising are just one part of a broader set of actions government is taking to support the public health agenda” (BBC, 2008).

Consumer Focus, a super-watchdog created by the UK government in September 2008, wants the loophole on Web advertising closed (Wallop, 2008). The statutory organization campaigns for a fair deal for consumers, spanning multiple industries, and investigates consumer complaints. Consumer Focus positions itself as “the largest and the best-resourced advocacy body in the history of the UK consumer movement” (Consumer Focus, 2010). However, Consumer Focus does not currently have a campaign specifically addressing childhood obesity or health; it does maintain an online press room covering multiple issues facing UK consumers.

**REATIONS AND PUBLIC RELATIONS ACTIVITIES OF NGOS AND CHARITIES**

WHO, which is responsible for global health leadership as part of the United Nations,
addresses global health issues on diet-related non-communicable diseases—and is the strongest global advocate on childhood obesity. In 2004, WHO developed its Global Strategy on Diet, Physical Activity and Health (DPAS), which also examined childhood obesity and the regulation of marketing of food and non-alcoholic beverages (WHO, 2010). The DPAS created an "implementation toolbox" with a collection of reports, including "Marketing Food to Children: the Global Regulatory Environment" (Hawkes, 2004), which identified six marketing practices of greatest visibility to the consumer in 73 countries, including Hungary and the UK: television advertising, in-school marketing, sponsorships, product placements, Internet marketing, and sales promotions. In May 2006, WHO presented a report, "Marketing of Food and Non-Alcoholic Beverages to Children," on food nutritional composition categories, examples of regulatory measures in specific countries, approaches by the private sector and health and consumer organizations, and recommendations for international action (WHO, 2006).

WHO’s global initiatives are also undertaken on a regional basis. The WHO Regional Office for Europe conducted the WHO European Ministerial Conference on Counteracting Obesity in collaboration with the European Commission in November 2006 in Istanbul. The conference aimed to "place obesity high on the public health and political agendas, foster greater awareness and high-level political commitment to action, and promote international and intersectoral partnerships" (WHO Europe, 2009, para. 2). Participants included delegates from the 53 first states in Europe, including Hungary and the UK, as well as the media and representatives from NGOs. To address the health challenges and provide future direction, member states adopted a European charter on counteracting obesity at the conference encouraging governments, the civil society, private sector, and the media to collaborate and support initiatives to combat obesity in Europe (WHO Europe, 2006).

Another prominent global voice of issues affecting consumers, including children, is UK-based Consumers International (CI), a worldwide federation of consumer groups with more than 220 member organizations in 115 countries (CI, n.d.). Founded in 1960, this nonprofit has campaigned to stop the marketing of unhealthy food products to children by proposing an international code to provide legal action against companies. Its initiatives include publication of reports, such as "New Media, Same Old Tricks" (CI, 2009), and global events held on World Consumer Rights Day (March 15), as well as blogging, petitioning, and other lobbying efforts. CI also recommends an international code to ban the "marketing of unhealthy foods to children using new media, such as websites" (CI, 2009, p. 18). Its membership organization in Hungary, National Association for Consumer Protection in Hungary (NACPH), was originally established in 1982 in Budapest, as one of the first consumer organizations in Central and Eastern Europe, and, in the UK, the National Consumer Council (NCC), which has merged with a few other UK consumer groups and renamed Consumer Focus.

CI member organizations around the world celebrated World Consumer Rights Day on March 15, 2008 with a focus on curbing the marketing of unhealthy food to children. The events included educational lunchbox challenges around the world, including ones hosted by the NACPH in Budapest and Zalaegerszeg, which were widely publicized with a proactive media relations campaign in leading print and broadcast outlets throughout Hungary. NACPH also distributed CI’s proposal for an international marketing code to the Prime Minister, Ministry of Health, Ministry of Education, and Ministry of Education and Culture (CI, 2008b). The UK’s NCC also was involved with media relations to support CI’s mission, generating pro-regulation stories on food promotion in such outlets as the BBC and the Guardian (CI, 2008b).

The non-profit “Media Smart” media literacy program was established in 2002, and is supported by several European countries, including the UK and Hungary. Geared to children, 6 to 11 years old, Media Smart was designed with the goal to “teach children to think critically about advertising in the context of their daily lives” and to use “modern media, including advertising content constructively” (Media Smart 2008a; Mediatudor 2008). The UK advertising industry funds the program, with contributions from such food manufacturers as Kellogg and McDonald’s, as well as non-food companies and industry trade groups (Media Smart, 2008b).

On a country-wide scale, the weak state and self-regulation inspired Hungarian NGOs to call for stricter regulations. Since Hungarian children spend an increasing amount of time outside the school using both traditional and new media, they are heavily targeted by advertisers. This prompted the Hungarian National Heart Foundation to launch a campaign promoting restrictions on advertisements of unhealthy food to children in 2006 with reference to the “Television without Frontiers” directive of the European Union. Together with seven other NGOs that include the Network for Healthy Kindergartens, the National Association for Consumer Protection in Hungary, the National Diabetes Foundation, and the National Institute for Child, they proposed a ban on television advertisements of unhealthy food from 6 a.m. to 9 p.m. (www.mnsza.hu). A year later, an informal network of Hungarian consumer and environmental NGOs for sustainable development (Association of Conscious Consumers, Hungarian Environmental Partnership Foundation, Waste Prevention Alliance, among others) set up a taskforce to initiate a public debate on the necessity of limiting all kinds of advertisements to children below age 12. The taskforce prepared the policy background material with psychological arguments, legislation case studies, and the introduction of media literacy programs from other countries. While having difficulties approaching the government, both NGO initiatives made independent proposals for to the Hungarian Advertising Self Regulatory Board and the Hungarian Advertising Association that called for public contribution to the revision of the “The Code for Advertisement Ethics” in 2009. The recommendations for the voluntary restriction of unhealthy food promotion were rejected (MNSZA, 2010 and personal communication, TVE, 2010).

The most significant health campaign of 2009 was “Nincs de” (No But). Coordinated by the Nincs De Foundation, “Nincs de” was created by the country’s biggest media and advertising companies in order to carry out a country-wide social marketing campaign. In 2009, its campaign combated unhealthy, sedentary lifestyles, as well as unhealthy eating and drinking habits. The campaign consisted of 61 print, 49 online and 25 broadcast advertisements, along with several hundred stories on the program in a variety of print and electronic media outlets ( Médiaunió, 2009). As a result, one out of four adults considered changing their lifestyles and 15% actually made steps to do so ( Médiaunió, 2009).
Advertisements of junk food on the Internet is not yet regulated, and voluntary initiatives have not yet been established to address this topic. The most recent initiative is the Safer Internet Programme (www.saferinternet.hu), that brings together stakeholders who can contribute to make the Internet safer. However, the program focuses on protecting children from sexual abuse, criminal exploitation, and on protecting their privacy, but not on health issues and Internet advertising.

The UK-based Which?, the largest consumer rights organization in Europe with more than 700,000 members, maintains a “Healthy Eating” campaign to combat irresponsible junk food marketing, as well as an active press office, online press room, publications, and consumer resources. The organization also conducted a survey in February 2008 in which 88% of the respondents felt that both the government and food companies need to do more to conduct more responsible marketing of foods to children (Which?, 2008). The study revealed the limitations of the new television bans since only seven of the top 50 shows popular by children viewers would be free of junk food advertisements, whereas the top 20 shows would be able to air any type of advertisements (Cassidy, 2008). Although Which?’s public affairs campaign to call for the pre-9 p.m. watershed ban on food advertising was unsuccessful, it generated significant media exposure and increased Web site traffic (Lepper, 2008).

According to the findings of a study of 500 children, ages 7 to 14, undertaken by the British Heart Foundation (BHF), one of the UK’s largest charities, nearly 70% of children consider fast food and sweets as part of a standard diet—and no longer as a treat, which prompted the BHF to launch a Food4Thought campaign for children to be more aware of junk food (Clout, 2008). Food4Thought also includes an online game for children, Yoobot (http://www.yoobot.co.uk/), using a similar creative strategy employed by food manufacturers with advergames. Users create their own Yoobot, an avatar as “a mini version of themselves,” to learn about the consequences about health by making decisions about its food consumption, exercise, and lifestyle. The mini-me avatar also can communicate with its “creator” by Short Message Service (SMS) and e-mail, becoming a part of the child’s life. Figure 2 shows a screenshot of the food selections one’s avatar needs to make in the virtual kitchen cafeteria.

**Figure 2. Yoobot, British Heart Foundation’s Online Game**

The BHF also collaborated with Sustain, a registered charity for “better food and farming” formed by merging The National Food Alliance and the Sustainable Agriculture Food and Environment Alliance *(Sustain, 2010)* and its Children’s Food Campaign. The 2008 report, "Protecting Children from Unhealthy Food Marketing," illustrated how junk food companies are enticing children into online playgrounds (British Heart Foundation, 2008). Both organizations have called for tighter rules on online marketing to children (BHF et al, 2008).

A survey by the not-for-profit Food Commission indicated that more than 12.2 million children logged onto commercial Web sites promoting foods and drinks during the first quarter 2005 (Boseley, 2006). The Food Commission’s mission is to challenge “the food industry and government to do more to tackle the ill-health caused by the over-processed, high calorie products that fill our supermarket shelves” (Food Commission, 2010). It publishes *The Food Magazine*, investigating food quality and nutrition, and coordinated campaigns and projects addressing public health issues.

**FOOD AND ADVERTISING INDUSTRY INITIATIVES**

In terms of regional self regulation, 11 of Europe’s largest food and drink companies pledged European-wide restrictions on advertising products to children under 12, called the EU Pledge program as voluntary measures to the European Commission’s Platform for Action on Diet, Physical Activity and Health, in effect January 2009. The 11 firms include Burger King, Coca-Cola, Danone, Ferrero, General Mills, Kellogg, Kraft, Mars, Nestlé, PepsiCo, and Unilever, which collectively represent two-thirds of food and drink advertising expenditures in the European Union. The pledge claims to make "a commitment to change food and beverage advertising on TV, print and Internet to children under the age of 12 in the European Union" (EU Pledge, 2007, p. 2). The EU Pledge’s Web site contains postings of pledges from the participating companies. Campaign Coordinator of the Children’s Food Campaign, Richard Watts, said, “The commitments fall well short of what health, consumer, and children’s organizations have been calling for and will do nothing to solve the children’s diet crisis. If this is the best industry can do it is high time for the Government to step in to protect children from junk food marketing“ (Junk Food Firms, 2007).

The Food and Drink Federation (FDF), representing the UK food and non-alcoholic drink industry, releases policy briefings and responses, produces publications, and conducts events on behalf of the food industry. The Incorporated Society of British Advertisers (ISBA), considered the voice of British advertisers with over 400 members, publicly commented “advertising does not make children fat” (Sweney, 2008, para. 10). The Advertising Association, a nonprofit industry trade group, established a new industry policy committee, the Digital Media Group, to examine how advertising and promotions on the Internet should be regulated (Wallop, 2008).
SECTION III: CONCLUSION AND FUTURE CONSIDERATIONS

Two of the major preventative health measures in both Hungary and the UK undertaken by the governments are social marketing campaigns geared to altering behavior, utilizing an integrated marketing communications approach with public relations, advertising, and other promotional vehicles to reach specific audiences. McKie and Toledano (2008) argue that the status of the practice of public relations could be elevated with social marketing. They applied the diffusion of innovation theory (Lattimore et al., 2007) in both public relations and marketing, with its five stages—awareness of the individual being exposed to the idea, interest in the idea, evaluation of considering the idea, trial in trying out the idea, and adoption of accepting the idea —and believe that public relations focuses more on the first two stages of awareness building through press releases and publicity, whereas social marketing understands how beneficial messages can persuade people to change, such as eating healthier foods. The field of social marketing has a history of a more altruistic approach than traditional public relations.

The challenges faced by marketing social change in these areas are huge; their emphasis on the goal of behavior change will not be achieved just by raising awareness and using communication. It needs much more than that. Social marketing practice opens interesting opportunities for public relations practitioners to reengineer campaign strategy to produce actual change and, as a result, to earn more respect from the organizations they serve, and gain positive social recognition for their contribution to such causes as the reduction of deaths from cancer (McKie and Toledano, 2008, p. 323).

McKie and Toledano (2008) discussed the risk of social marketing campaigns being perceived as “propaganda and coercion,” and concluded that “a dialogue between social marketers and public relations practitioners about those dilemmas would benefit both disciplines” (p. 324).

Both anti-obesity social marketing campaigns by the governments in Hungary and the UK are partially funded by the producers of unhealthy foods. The coordinator of Sustain’s Children’s Food Campaign said, “Should a firm that produces confectionary really be involved in a campaign to tackle obesity?” (Lepper, 2008b, p. 11). Can food manufacturers seriously make a contribution to anti-junk food campaigns, while they promote their brands and products to increase market share and revenues? A communications planning director for a UK-based communications agency said, “Change4Life is a clear attempt to influence consumer behaviour and attitudes, but educating people is only half of the equation. Until the economics of creating and distributing unhealthy products changes, they will continue to be abundantly available” (The Marketing Society Forum, 2009, p. 22). This ethical dilemma could be examined further by investigating the marketing and public relations of preventative health campaigns by the governments and the producers of other legal products, such as tobacco and alcohol, that also have serious health consequences and can be abused by today’s youth.

Is a social marketing approach the best solution to educate parents, children, educators, and other stakeholders on nutrition, fitness, and healthy lifestyles? Health public relations and promotions should help to “inform children and about their risks associated with daily consumer choices” and marketers also need to “find creative ways of ensuring that they even young people understand fully the benefits of active lifestyles” (Kline, 2005, p. 254).

An innovative example is the British Heart Foundation’s Yoobot online game, which engages children in a fun virtual playground, and has been widely publicized through releases and blogs.

Are anti-junk food media relations from the government and consumer advocacy groups creating a moral panic? Kline (2005) studied the spike in childhood obesity-related content in the Guardian from 1999 to 2004, concluding that the UK press covered the “epidemic story with intensifying alarm” that “became the key child-health story.” Food industry spokespeople have defended their actions through public statements and media interviews, claiming freedom of speech, debating the evidence of studies on “a link between advertising and child obesity” (Young, 2003), and blaming the government for cutbacks on recreational programs and families for more sedentary lifestyles (Pringle, 2004). Future studies could examine how the obesity epidemic has been covered in major print and broadcast outlets in Hungary and the UK, particularly to determine if the recent government campaigns on preventative health have made a positive impact on consumer literacy—and actually resulted in reaching adoption, the final stage of the diffusion of innovation theory, of a healthy lifestyle for children with a decline in obesity.
REFERENCES

Act XLVII of 2008: 2008. évi XLVII. törvény a fogyasztókkal szembeni tisztességével kereskedelmi
gyakorlat tilalmáról

Act XLVIII of 2008: 2008. évi XLVIII. törvény a gazdasági reklámtevékenység alapvető feltételeiről és
egyes korláthatáról


LRSZ (2005): Magyar reklámtétikai kódex, Magyar Reklámszövetség, Budapest, Hungary


The Marketing Society Forum—do we need another code to underpin food and drink marketing? (2009, August 26). Marketing, 22.


Communicating Public Money: Risks vs. Opportunities
by Nina Furman

INTRODUCTION

Over the last two decades the development of Slovene professional communication has helped the public sector to shift from a re-active to pro-active approach, from public apathy to wider interest, from ignorance to knowledge and from general acceptance to healthy prejudice. The expansion of media has been so influential that public sector needed to build not only on its recognition but above all on its reputation which is exceedingly connected with sound financial management.

Nowadays the public and media focus is more and more targeted toward proper and wise spending of public money which places the Court of Audit of the Republic of Slovenia into unique position on the public sector communication map.

Within the Slovene Court of Audit Strategy 2007-2013 we emphasized that Slovenia is witnessing changes in the delivery of public services and further reforms are expected over the coming years: plans to continue with the privatization of state owned assets, with the public private partnerships, the outsourcing of public services is increasing and a significant increase in EU funds is expected. Also, the substantial public funds, namely annually over than 4 billion € or almost the half of entire State Budget are spent through public procurements. It is essential that the public sector is able to manage these objectives effectively. If not, there could be increased risk of financial mismanagement, poor value for money or even fraud. The Court of Audit is uniquely placed to communicate to Parliament as well as wider public with assurance on the financial management, regularity and value for money with which Ministries and other state bodies have used public funds.
The mission of the Court of Audit is to inform the public about important audit findings from the audits of state bodies and other public funds. The primary objective for the Court of Audit is to assure the public in a timely and objective manner if the public funds were appropriately protected and whether their use by Government, local authorities and public enterprises was regular and effective. This objective became even more important bearing in mind the recent unfavorable economic situation where savings and good financial performance is highly appreciated. Even in times of favorable economic situation Government was daily facing media questions on effectiveness, efficiency and value for money of its operations but during the financial crisis these topics became even more highlighted.

In addition, due to its experience and expertise in best practices the Court of Audit gives advice to state bodies and other public funds users on how to improve their financial operations. By disclosing irregularities and inefficiencies, the Court of Audit points to the responsibility of state bodies and holders of public functions, and therefore contributes to the welfare of the citizens of the Republic of Slovenia and the European Union.

However, the name Court of Audit might be treated a misnomer since the institution does not have judicial competencies neither is a part of judiciary branch of power. The assumption is that when drafting the Slovene Constitution the founding fathers followed the example of the European Court of Auditors. The word Court in Slovene Supreme Audit Institution is the cause of frequent public misunderstanding and many times over there is a need to explain the institution’s powers since it is issuing the opinions, not passing the judgments.1 The United States’ Supreme Audit Institution overcame the similar problem in 2004 renaming their institution from General Accounting Office to Government Accountability Office. The management explained they followed the acronym GAO and tried to find the expression that reflects and communicates more who they are and what they do. Often called the „congressional watchdog,” GAO investigates how the federal Government spends taxpayer dollars. On official website GAO explains their mission is to support the Congress in meeting its constitutional responsibilities and to help improve the performance and ensure the accountability of the federal Government for the benefit of the taxpayers. GAO claims their work saves 114 $ for every spent dollar which in 2009 represented a sum of 58 billion $ (43.4 billion €) public savings.

1 In the recent interview “The Court of Audit is not a nuisance only when it keeps quiet”, Mag, February 15, 2010, p. 30) the President Dr Igor Šoltes when asked about the misunderstanding of the institution’s name answered that the main difficulty derives from the word Court. Dr Šoltes further explained that the most adequate denomination and also traditional expression established within the International Organization of Supreme Audit Institutions (INTOSAI) is Supreme Audit Institution.
€ only in the period of 2004-2007. At the beginning of 2009 we disclosed that public money costs for drug prescribing only in 2007 amount half billion € (!) and are rising on a scale of 6 % each year (2001-2006). Only 1 % of annual decrease of the costs would mean 5 million € of savings.

Through these and similar audit findings which reveal broad horizons that have direct impact on many different social aspects we achieve comprehensive public response also reflected in increasing number of received individual audit initiatives ranging from 83 (in 2000) to 380 (in 2008) per year. Such increase is a positive proof of the wide public acceptance and recognition which can only be achieved with independent expert audit work, accountability, transparency and sound media relations. Moreover, these publicly recognized audit findings could be perceived by the Government as areas for substantial improvement and opportunities for communicating better results.

GOVERNMENT COMMUNICATION THROUGH THE RESULT BASED BUDGET

Not only audit findings and disclosures but also recommendations and advisory function on effectiveness, efficiency and economy of public funds are of key importance for the Government. Public services are becoming much more complex, both in nature and their organization. The budget volume is increasing (the realization of the State Budget in 2007 was 7.5 billion €, in 2008 8.2 billion € and in 2009 8.9 billion €) and so are the risks to value for money. The Government could have better position in communicating its results since the adoption of the 2010-2011 Result Based Budget (RBB). It is a results-driven budgeting process, an approach focused on achieving measurable results, almost a management strategy aimed at changing the way Government operates. RBB is about formulating program budgets that are driven by a number of planned results which are articulated at the beginning of the budgetary process, and upon which actual performance is measured at the end of a biennium. Biennial budgeting and resources justification involve a set of predefined objectives, expected results, outputs, inputs and performance indicators. Expected results justify resource requirements, which are derived from outputs to be delivered and actual performance in achieving results is measured by predefined performance indicators.

From Government communicators’ viewpoint each expected result could represent an opportunity for effective communication campaign. As Dr Verčič explains in foreword of the Communication Campaigns book (Serajnik Sraka 2009, 6), no one knows exactly how many public communication campaigns are conducted in a year’s time and how much do they cost which also indicates the overall relation toward public money. Dr Verčič further reflects that it might as well be a several million € amount that disappeared without a trace. Many states are investing large sums of public money in communicating but the overall effect should be known to all citizens, Dr Verčič concludes. Chris Berg in Sydney Morning Herald wrote in December 2009 about costs of Government communication campaigns in Small Government does not mean cheap: „Take the $20 million we’re handing to a public relations firm to rebrand the entire country. Launching Building Brand Australia, the Trade Minister, Simon Crean, said: „We must find a better way to define our identity.”

It could also be a challenge for the Court of Audit to perform an audit in this field following a good practice of British National Audit Office (NAO). At the beginning of 2006 NAO presented the audit report Department for Work and Pensions: Using leaflets to communicate with the public about services and entitlements. The presumption of the audit was that Government needs to communicate effectively with citizens and highlighting the importance of accurate and complete information easily available to citizens. The Department for Work and Pensions provides services to some 28 million people. It communicates with them face to face through more than 1,000 local offices and around 70 contact centres and through letters, leaflets and its websites. Despite the development of new technology, printed materials, in particular leaflets, play an important role in ensuring that customers are informed of services and entitlements. It is vital that customers can rely on the accuracy of this information to make informed choices about their lives. The Department spent around £110 million (122 million €) on communication activity in 2004-05. The total costs associated with the preparation, revision, storage and circulation of material are not known exactly but NAO estimated them at £31 million (34 million €) a year.

THE TRUTH AND SIMPLICITY: DIFFICULT CONCEPTS?

PR practitioners, especially within the public sector where tax-payers money is being spent, should be sensitive to and considerate of how their actions will influence the public. If you lie once, you will never be trusted again, particularly by the media. Consequently, the very important objective is to promote high standards on transparency and accountability in financial management and performance of public administration. Another major issue when communicating financial questions/findings/issues is simplicity. All public sector communication activities should be based upon the following principles: correct and understandable, well structured and easy to access, prompt, relevant and adapted to different target groups.

CASE STUDY: The British “Bourn(e) Trilogy”

The Identity

The role of the National Audit Office (NAO) is to audit the accounts of all Government departments and agencies as well as a wide range of other public bodies, report to Parliament on the economy, efficiency and effectiveness with which these bodies have used public money. The institution has a long and respectful history, in 1780, Commissioners for Auditing the Public Accounts were appointed by statute. The NAO slogan is: Helping the nation spend wisely. When presenting (National Audit Office) the tasks, competencies and duties on the website, NAO is explaining:

Robert Ludlum, which have been adapted to film in a series starring Matt Damon.
“We hold Government to account for the way it uses public money. We support, by helping public service managers improve performance. We safeguard the interests of citizens who as taxpayers are responsible for paying for public services. We champion the interests of citizens as users of public services. Our work saves the taxpayers millions of pounds.”

NAO budget is set by Parliament, not the Government. Oversight of the NAO is carried out by the Parliamentary Public Accounts Commission (PAC) who appoint NAO external auditors and scrutinise their performance.

The Supremacy
The Comptroller and Auditor General is the head of NAO, appointed for life (!) by the Queen on an address proposed by the Prime Minister with the agreement of the Chairman of the Committee of Public Accounts and approved by the House of Commons. Sir John Bourn was appointed the Comptroller and Auditor General in 1988 by Margaret Thatcher and Robert Sheldon, the then Labour chairman of the Parliamentary PAC. To preserve his independence from the Government he can be removed only by a joint vote of the House of Commons and House of Lords. The Auditor General holds the only “unsackable” senior post in UK governmental administration. In March 2006, Sir John was also appointed head of Professional Oversight Board by Tony Blair to advise ministers on potential clashes between their public duties and private affairs and to investigate any claims that the rules have been broken. Sir John Bourn has been in the job nearly 20 years when allegations of improper personal expenditures sprang on his behalf.

The Ultimatum of 2007
During the spring and autumn of 2007 the British satirical magazine Private Eye frequently highlighted the issues of expenses, conducts and lifestyle of Sir John Bourn (Private Eye Magazine). Under the provisions of the Freedom of Information Act the figures were released in May 2007 for 43 trips Sir John (and on 22 occasions his wife (!), too) attended, worth £336,000 (slightly over 375,000 €) during 2004 - first quarter of 2007. The comparison to travel expenses for the President of Slovene Court of Audit shows that in period 2005-2007 he was on 38 official and working visits abroad. Accommodation, travel expenses and daily allowances were in total 35,554 € or less than 10 % of travel expenses for Sir John Bourn.

The next to tackle this issue was the British Daily Mail (The British Daily Mail) then followed the Guardian (http://www.guardian.co.uk/politics/2007/oct/11/uk.Whitehall), BBC and actually all other British media. In the middle of October 2007 NAO published details of all Sir John’s restaurant bills since 2004 (£27,000 or 30,000 €) and the full costs of all his foreign trips (£365,000 or slightly over 405,000 €). The details uncovered exotic destinations such as Bahamas, almost as a rule flying first class including Lady Bourn and 175 lunches and dinners in UK at the Ritz, Savoy, Cipriani, Wiltons and other - the most expensive at a sum £500 (555 € for four persons). All paid from public money.

But media and MPs were hard to convince on Sir John’s good intentions and repeatedly reported that Auditor General found himself in a very difficult position as guardian of the public purse himself leading such extravagant lifestyle on taxpayers account. Mark Serwotka, general secretary of the Public and Commercial Services Union, which represents Government administration’s lowest paid civil servants, said: “With Government departments facing budget cuts and slashing jobs over the next three years, you would think that those responsible for ensuring value for money would lead by example.” NAO consistently defended Sir John pointing out that he needs to “keep up in touch with a wide range of people” (The Guardian).

At the end of October 2007 Sir John Bourn announced he would retire because new auditing rules would lead to him technically overseeing himself (he was the chair of the Professional Oversight Board of the Financial Reporting Council, which was to begin inspecting auditors general). The NAO said his decision was unconnected to the expenses issue. Also, the PAC, which oversees the NAO, cleared Sir John of impropriety over his expenses. Alan Williams, chairman of the PAC, said (The Guardian) the comptroller and his colleagues should be very proud of their work. “It was Sir John who originated the idea of setting the National Audit Office a target of achieving savings equal to six times its annual budget. This year these savings are expected to reach £660 million” (over 733 million €).

Gordon Brown said (The Guardian) in a statement: “I am very grateful to Sir John Bourn for his leadership of the NAO over many years, during which it has performed a crucial function scrutinizing public spending and propriety, and send my best wishes for his retirement.”

BUDGET VOLUME - FINANCIAL RESOURCES FOR PR DEPARTMENT

Fraser P. Seitel explains that public relations, like any other business activity must be based on sound budgeting. After identifying objectives and strategies, the public relations professionals must detail the particular tactics that will help achieve those objectives. No organization can spend indiscriminately. Without a realistic budget, no organization can succeed. Likewise, public relations activities must be disciplined by budgetary realities and flexible enough to withstand midcourse corrections and unexpected cost overruns (Seitel 2004, 82-84).

On the contrary to the communications departments of private sector, the public sector communicators often face very tight budgets or even no particular funds for their activities.

The principal goals of Government communication are to make government action more transparent and to generate interaction with their publics. If we see the main PR department tasks as communicating from a wider societal perspective, make the organization more communicative and (especially in the Government) do more work on citizen participation, we should be aware of the importance of sufficient budget. Although the phrase “sufficient budget” represents a bit vague term, PR practitioners must be aware of the role they are playing when annual budget for their institution is being drafted. No one can expect great
results and successful public awareness campaigns without reasonably well (structured) budget for PR. Therefore, even in the time of financial crisis and in many cases for the sake of it communication budget should remain reasonably intact. But what does the PR budget reality reveal?

Leaving no doubt the authors of the book Media Relations (Verčič et al. 2002, 56-57) very precisely define the need for proper financial management and budgeting of each media plan. Authors explain that each media strategy becomes tangible within the plan and within the budget. Within planning the media strategy is being analyzed to several steps which also define the necessary funds and human resources. All that remains, are desires until we have the clear idea how much will something cost and where from the resources will be allocated. But the relations with media are far too serious to be left to day-to-day inspirations. Whoever is responsible for managing the media relations must have sufficient and planned in advance resources otherwise she/he will not have anything to manage at all, claim the authors.

THE PEER REVIEW ON BUDGETING FOR PUBLIC RELATIONS

Related to the budgeting and budget planning in the field of PR, the Supreme Audit Office of the Slovak Republic initiated the idea of performing the Peer Review of the Institution’s operations. One of the three main objectives is the peer review of the Institution’s Public Relations Office. The Court of Audit of Slovenia, the National Audit Office of the United Kingdom, the National Audit Office of Estonia and the Supreme Chamber of Control of Poland provided positive responses to carry out such peer review. The National Audit Office of the United Kingdom is the team leader, the Memorandum of Understanding will be signed in May 2010 and the results (submitting the final report) of the peer review are to be expected in May 2011. The Peer Review Team will consist of community of experts in the PR field, who are highly qualified to perform impartial review. PR experts originate from four different European countries and such team structure will enable the thorough screening of all aspect of Slovak SAI’ public relations office. Undoubtedly the significant part of the procedure will be the very important issue of budget planning and relation to the planned (expected) and realised results in the PR field. Upon the accessible data such peer review will be one of the first ones and the conclusions/findings will definitely contribute to setting new milestones in value for money and in needs of proper budgeting.

BENCHMARKING BUDGETS FOR PUBLIC RELATIONS IN GOVERNMENT VS. SUPREME AUDIT INSTITUTIONS

In-house public relations departments vary in size and duties and so do their budgets. With the intention to make a comparison of budget volume for PR between government bodies and supreme audit institutions (SAI) a short study was performed in March 2010 (series of e-mail messages to author) for this paper amongst 14 European countries with very different backgrounds. The results were then compared to publicly accessible data on the costs/contracts for communication services within the ministries (government bodies).

AUSTRIA
In 2009, the Austrian Court of Audit spent 12.000 EUR (0,038 % of total budget 2009) on PR services. For 2010, 15.000 EUR (0,052 % of total budget 2010) are allocated for PR services.

BELGIUM
In 2008 the Belgian Court of Audit spent 32.051 € for its public relations service (expenses for publication of reports and reception costs). This is 0.07 % of the institution’s total budget.

BULGARIA
The share of resources of the Bulgarian Supreme Audit Institution for its public relations service (salaries plus presentation materials) is around 0.7 % of the total budget.

THE CZECH REPUBLIC
The 2009 budget of Supreme Audit Office of the Czech Republic (SAO) for PR including costs of publications to promote SAO’s activities was 16.000 €. The SAO’s overall budget was 25.786.600 € so the PR budget represented the share of 0.062 %.

ESTONIA
According to Estonian Supreme Audit Institution budget for 2010 PR expenses form 0.6 % of the budget or 22.370 €. In addition, the same number form the budget for PR expenses of the Secretariat of the INTOSAI working group on environmental auditing that was created 3 years ago. It means 1.2 % of the budget resources are planned for PR.

GERMANY
The total budget of the Bundesrechnungshof amounts to 110.000.000 €, from which - to give a true and fair relation - the pensions should be discounted, that makes in round terms 85 mio. The amount of resources disposed for the public relations service is 41.000 €, that makes a share of round about 0.05 %.

GREECE
For the year 2010 the Greek Supreme Audit Institution has been given the sum of 1.800 € for the public relations service.

HUNGARY
The State Audit Office of Hungary expenditures for 2010 sum a total of 30.650 €. The expenditures for Media research services are 20.500 €, for the Hungarian News Agency services 10.000 € and for press conferences (cost of coffee, water, biscuits) 150 €. In addition, the SAO revises and publishes its Strategy and Introduction Brochure every 4 years. Last time they were published in 2006 and the expenditure for printing costs was 3.850 €.

LUXEMBOURG
The budget includes an amount of some 15.000 € to cover expenses for consulting in public relations. Small expenses for public relations are spread on different budget funds together with other expenses so that it is impossible to determine the exact amount of
them. The entire budget for 2010 amounts to 3.900.000 € (3.6 mio € for salaries – 300.000 € for other expenses). In case the 15.000 € is considered it would represent 0.38 % of the total.

MALTA
The estimated figures for the public relations activities would sum up roughly at around 10 working days at a total cost per annum of 2000 €.

THE SLOVAK REPUBLIC
The Supreme Audit Office of the Slovak Republic approximated the PR expenditures to around 7.000 – 8.000 €/year; it means approximately 0.1 % of total expenditures of the office.

SLOVENIA
The PR related costs at the Court of Audit in 2009 were 20.462 € in total. This sum includes contract for clipping, contract with Slovene Press Agency, printing costs for Annual Report, photo material and cover design for audit reports and costs for background stands for press conferences and statements. The overall budget of the institution was slightly over 6.7 mio € thus the share for PR represents 0.3 %.

SPAIN
The Spanish Court of Audit’s 2010 budget amounts to 61.189.000 €. The total expenses calculated for 2010 for PR (excluding personnel) are presentation materials and other publicity items / 6.000 €, expenses associated to meetings and conferences / 40.000 € and press Office / 28.000 €. These three areas amount to 74.000 € and represent 0.12 % of the total budget for 2010. This amount does not include expenses for institutional and international relations.

SWEDEN
The Communications Department of the Swedish Supreme Audit Institution (SNAO) has a budget of approximately 700.000 €. That includes salaries, premises, information materials, etc. The total budget of SNAO is approx. 300.000.000 € hence the budget of the Communications Department is 2.38 % of the total budget.

Although the assembled data are not fully comparable (some institutions quoted 2008 or 2009 and other 2010 budgets, some included salaries and premises) the comparison between 14 different European countries indicates that shares for public relations are overall relatively low. The range stretches from 0.038 % (Austria) to 2.38 % (Sweden). The numerical indicators are a bit more optimistic from the perspective of the Swedish Supreme Audit Institution since the costs spent on PR were incredible 700.000 € (including salaries and premises) but highly disappointing being a PR employee of SAI Greece (1.800 €) or SAI Malta (2.000 €). Many times over communicating within such tight budgets represents quite a challenge and requires much of inventiveness for every single communicator. Similar standpoint is represented in Communication Campaigns (Serajnik Sraka 2009, 130-132) where author is explaining that practice often shows the lack of resources therefore one has to be inventive and wise in allocating the funds.

In Media Relations authors (Verčič et al. 2002, 56-57) specifically explain that planning media relations is of no significance if there is no clear and evident will of ensuring proper resources. PR practitioners, communicators need their own budgets and need to be autonomous when allocating funds in accordance with proposed and approved plans. The practice too often shows no such independence which is one of the repeated reasons for failed results or unexecuted media plans even though they were of great potential and well conceived. If management does not trust communicators with budget autonomy how can they trust them with their full media image? Many think that day-to-day news watching, radio listening and reading newspapers justify them as media experts but such opinion is extremely naïve, conclude authors.

And finally, what is the size of Government PR budget? The entire amounts of PR funds in ministries could not be determined since expenses for public relations are spread on different budget items (many times together with other expenses) therefore it is impossible to exactly define the overall number. The important segment represents the Government Communication Office (GCO) which is a professional service with two divisions: Division for Media Relations and Communications Projects Division. The GCO budget realization was almost 7.2 million € in 2007, almost 8.0 million € in 2008 and 5.4 million € in 2009. The substantial difference (decrease in 2009 in regard to 2008/2007) is in the fact that in second half of 2008 Slovenia was holding the EU Council Presidency. The substantial funds were amounted for communication and promotion of series of meetings and events.

Furthermore, other budget related data is publicly available. In October 2009 one of the Members of Parliament received the answer to his parliamentary question on all contracts for PR in ministries and government bodies. Government pointed that the majority of ministries do not subcontract external PR agencies since the work is done by in-house PR departments. In several cases where the contracts have been made they deal only a few targeted program priorities of each contracting authority (ministry). The total sum of external PR costs in 2009 was slightly under half million € of which newly concluded contracts represent 189.159 €. The total sum of external PR contracts in period 2006 - 2008 was over 2.1 million €. Furthermore, journalist Matija Stepišnik (Stepišnik 2010) noted that funds for PR in 2009 were substantially reduced in comparison with some earlier years. Stepišnik thoroughly analyses every single existing contract. His article reveals the sums of contracts are no higher than 48.000 € (Ministry of Transport). Overall realization of this Ministry’s budget was almost 600 million € therefore the share for external PR represents 0.008 %. There is a great resemblance with other existing contracts vs. budgets for example Ministry of Finance (0.008 %), Ministry of Health (0.04 %) or Ministry of Foreign Affairs (0.04 %). The issue of value for money in Government PR is evidently very interesting for other media, too. Upon currently accessible information the Radio Slovenia, Val 202 will dedicate special attention benchmarking Government PR performance vs. private sector PR performance. The special radio broadcast is planned to be on-air in April 2010.

With previously quoted numbers and PR shares within budgets there is a need to once again point out the standpoint of many authors and PR experts and their concern that the
lack of resources leads to poor results or even no results at all. If Government really wants
to follow and execute the Result Based Budgeting and communicate the results they could
follow the principles of Osborne and Hutchinson as described in The Price of Government
(Osborne and Hutchinson 2004, 62-70). In chapter Setting the priorities of Government: Buying results that citizens value (and the price they are willing to pay) authors explain
that prior to setting any “facts and figures” Government should go through a process of
answering five key questions which lead to five key challenges:

1. Getting a Grip on the Problem: Is it short or long term? Is it driven by revenue or expenses, or both?
2. Setting the Price of Government: Determining how much citizens are willing to pay.
3. Setting the Priorities of Government: Deciding which results citizens value most.
4. Setting the Price of Each Priority: Deciding how much the government will spend to
produce each of these outcomes.
5. Purchasing the Priorities: Deciding how best to produce the desired results at the price
citizens are willing to pay.

That citizens want value for their money is no mystery. Government can win the competition
for public support only by delivering more value per each public euro spent. And for the
final consideration government managers and communicators could follow a set of three
Osborne’s older advice (Osborne 1993, 149):

1. Balance short-term and long-term gains; implement some easy changes while you plan
for long-range change.
2. Look for opportunities, not problems, focus on results.
3. Don’t promise too much. Politicians who run on a platform of fixing every social ill that
afflicts their jurisdiction are setting themselves up for failure-programmatic and political.

REFERENCE-LIST ENTRY

Books

Newspaper Articles

Web sites
Slovene Court of Audit Strategy 2007-2013.
http://www.rs-si/rsrs/rsrs.nsf/I/KC7BFA7711BBA2EDBC125723C005000F6D
http://www.rs-si/rsrs/rsrs.nsf/I/K86546B35F636AAC1C1257155004B3D11
http://www.rs-si/rsrs/rsrs.nsf/I/K86546B35F636AAC1C1257155004B3D11
Audit Report on Management of State Owned Apartments.
http://www.rsrs.si/rsrs/rsrs.nsf/I/KF492D1ADC5A7DBCC12572F300259D974?openDocument&appSource=FC914121789FBE94C12571550047D1A9
http://www.rsrs.si/rsrs/rsrs.nsf/I/K29468874F0E38504C12574C6003CCF53?openDocument&appSource=FC914121789FBE94C12571550047D1A9
Performance Audit Report on VAT.


http://www.nao.org.uk/about_us.aspx
http://www.private-eye.co.uk/
http://www.guardian.co.uk/politics/2007/oct/26/uk.Whitehall
http://www.guardian.co.uk/politics/2007/oct/26/uk.Whitehall
http://www.dzrs.si/index.php?id=94&q=pogodb&author=89&unid=VPP|F3B0F108DE1E8FC0C1257651004A92C3&showdoc=1

E-mail messages

Brian Vella, e-mail message to author, March 1, 2010.
Mª Jose de la Fuente y De La Calle, e-mail message to author, March 2, 2010.
Arnell Göra, e-mail message to author, March 4, 2010.
Rein Söörd, e-mail message to author, March 4, 2010.
Marco Stevenazzi, e-mail message to author, March 5, 2010.
Radek Majer, e-mail message to author, March 5, 2010.
Eszter Dürr, e-mail message to author, March 9, 2010.
Daniel Tibor, e-mail message to author, March 9, 2010.
Konstantinos Kostopoulos, e-mail message to author, March 12, 2010.
Snezhina Dimitrova, e-mail message to author, March 15, 2010.
Igor Ciho, e-mail message to author, March 15, 2010.
Franz Wascotte, e-mail message to author, March 17, 2010.
Hayo van der Wal, e-mail message to author, March 24, 2010.
Wolfgang Wiklicky, e-mail message to author, March 26, 2010.
The Use of Intentional Positioning Techniques in Government Agencies’ Communication Campaigns

by Melanie James

INTRODUCTION

Positioning, as a concept in academic literature, is most frequently associated with marketing studies. Positioning in a public relations sense is underexplored with only a relatively small amount of works relating to positioning in any sense published in the public relations literature1 (e.g. Hallahan 1999; Motion 1997; Roper 2005; Wang 2007; Waymer and Heath 2007; Wu 2007). However in recent studies (Beurer-Zuellig, Fieseler and Meckel 2009; James 2009) positioning has been shown to be a not insignificant aspect of public relations practitioners’ roles. James (in press) identified that marketing definitions of positioning, which primarily relate to the four “P’s” of marketing – product, price, placement and promotion (Egan 2007), are insufficient to define positioning in the context of public relations practice and has put forward a provisional conceptual framework for intentional positioning in public relations.

This paper reports on further testing and development of the framework and applies it to government agency/publicly-funded organizations’ campaigns as a way of examining whether positioning in public relations was different to that seen in commercial marketing, as marketing as a rule is not generally associated with government communication. This project set out to investigate whether government agencies’ and other public sector organizations’ communication campaigns in Australia employed public relations positioning techniques, as defined by James (in press), in their quest to achieve communication goals.

Whilst politicians may use marketing positioning techniques in their electoral campaigns or to advance their progress through the political party system (Roper 2005), there is no literature that addresses if and how government agencies and public sector organizations employ public relations positioning techniques. Glenny (2008, 153) has researched aspects of government agency communication and found that although political communication has received extensive attention in the literature, “there has been less focus on the apolitical function of communication undertaken by governments and the public servant’s role within it”. This paper is a contribution towards filling this void. Government agencies in Australia enact the political agenda of the elected government and are staffed by public servants “committed to notions of professional neutrality” (Althaus, Bridgman and Davis 2007, 12). Their use of positioning may, at first glance, seem at odds with this notion of professional neutrality. Public sector organizations in Australia are funded by governments and generally deliver services such as education and health but also include public corporations such as government-owned utilities delivering power and water services. This study shows that positioning undertaken by such

1 See a review of the published literature in James (in press).
government agencies and organizations is something quite different to that which is seen in marketing contexts.

POSITIONING IN PUBLIC RELATIONS

Only one specific public relations positioning definition was found (Motion 1997) apart that that put forward by the author (James, in press). Motion take a discourse approach and states that:

... positioning is a subjectifying process of locating and being located within discourse sites or spaces...involves the struggle to create what may be known and how it may be known...Positioning may be either a strategic maneuver or ploy by an individual, or the result of the discourses one is situated within as a subject of particular institutional relations, power relations, and social relations (1997, 7).

Although this definition is very apt to what the author has observed in her research, another, albeit related, definition that aligns more with what could be termed mainstream public relations practice rather than critical theoretical approaches was suggested by James (in press):

Positioning can be defined as the strategic attempt to stake out and occupy a site of intentional representation in the contested space where meanings are constructed, contested and reconstructed.

This definition could serve as part of an heuristic for positioning in public relations and embraces a more social constructionist theoretical perspective. It draws on the work of Berger (1999, 186) where he suggested that:

public relations provides organizations with dynamic and comprehensive methods and processes of intentional representation in contested sites in which information is exchanged, meaning constructed and managed, and consensus, consent, and legitimation gained or lost with others.

And that:

"representation refers to the purposeful expression of organizational voice(s) and appearance(s) to influence others".

James (in press) built on this new definition and developed a provisional conceptual framework for intentional positioning in public relations campaigns (see Figure 1) based on the Positioning Theory from the field of social psychology developed by Harré and van Langenhove (1999). This framework has been applied to 21 Australian award-winning government agency/public sector organizations’ communication campaigns from the period 1999-2008. All had won a Public Relations Institute of Australia Golden Target Award in their categories. There were three award entries from federal government-funded organizations, 14 from state government-funded organizations (covering 5 of the 8 Australian states and territories) and 4 from local government-funded organizations. The data to which the framework was applied was that generated by textual and thematic analysis of the award entry texts and the transcripts of interviews with selected practitioners who designed award-winning government communication campaigns in recent years.

APPLYING THE PROVISIONAL CONCEPTUAL FRAMEWORK FOR INTENTIONAL POSITIONING IN PUBLIC RELATIONS

The framework for intentional positioning in public relations campaigns has four domains as shown in Figure 1 below.

Figure 1 - Conceptual Framework for Intentional Positioning in Public Relations Campaigns – mark II

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<thead>
<tr>
<th>POSITIONING TRIANGLE DOMAIN</th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Evidence of first positioning triangle pole of position, i.e. entity’s point of view of its own and stakeholders’ actual and potential positions e.g. determine the desired position</td>
<td>Evidence of second positioning triangle pole of speech act/action, i.e. language/action used to achieve an specific consequence or outcome e.g. enact the desired position</td>
<td>Evidence of the third positioning triangle pole is story i.e. a storyline that the entity has chosen to promulgate through its public relations activities e.g. construct meaning through storylines about the position declared</td>
<td></td>
</tr>
<tr>
<td>POSITIONING TYPE DOMAIN</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Evidence of situations of deliberate self-positioning</td>
<td>Evidence of situations of forced self-positioning</td>
<td>Evidence of situations of deliberate positioning of others</td>
<td>Evidence of situations of forced positioning of others</td>
</tr>
<tr>
<td>POSITIONING PURPOSE DOMAIN</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Evidence of positioning for the purposes of ingratiating</td>
<td>Evidence of positioning for the purposes of intimidating</td>
<td>Evidence of positioning for the purposes of self-promotion</td>
<td>Evidence of positioning for the purposes of exemplific-ation</td>
</tr>
<tr>
<td>Evidence of positioning for the purposes of supplication</td>
<td>Evidence of positioning for the purposes of facilitation</td>
<td></td>
<td></td>
</tr>
<tr>
<td>GOAL DOMAIN</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Evidence of intended positioning related to a desire to achieve a specific goal</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

3 A comprehensive explanation of the framework and its background can be found in James (in press).
The work undertaken to date by the author to apply this conceptual framework to examples of practice as described in Australian award entries indicates that for successful positioning to occur, the three poles of the positioning triangle should be aligned (the positioning triangle domain). It should be clear as to the type of positioning that is occurring (the positioning type domain) and for what purpose it is being undertaken (the positioning purpose domain). In Harré and van Langenhove’s (1999) Positioning Theory, five purposes for positioning were articulated however, James (in press), in adapting their work for a public relations context, identified a possible need for another purpose category – positioning for the purposes of facilitation. It should be noted that the framework presented in this paper has been labeled “mark II” as the sixth purpose for positioning, facilitation, has been added in light of the results of this current project. The final domain of the positioning framework is the goal domain i.e. there should be a clear overarching strategic communication goal to which the positioning aligns.

Possibly the most challenging part of the framework as proposed by James (in press) is the positioning triangle domain, and specifically, the second pole of the positioning triangle – speech act/action. At the first pole, the desired positioning is determined through analysis of research findings and strategic decision-making. It is at the second pole of the positioning triangle where the desired positioning is enacted and this process draws on Speech Act Theory, a theoretical area with which few public relations scholars apart from Neff (1998; 2008) have engaged. Searle (1979), who built on the work of Austin (1962), suggests five ways of using language or “five general categories of illocutionary acts” (Searle 1979, viii):

- We tell people how things are (Assertives), we try to get them to do things (Directives), we commit ourselves to doing things (Commissives), we express our feelings and attitudes (Expressives), and we bring about changes in the world through our utterances (Declarations). (Searle 1979, vii).

The method I used in this project aligns with Searle’s approach which he states is “in a sense empirical” (1979, viii) but which I view as interpretative. It involves looking at the uses of language in each award entry and identifying evidence of one or more of the five general categories of Speech act/actions in the context of the discourse within which the award entry is situated. I then claim that particular speech-acts/actions can be classified under these headings. This approach is more than just looking for verbs in the text such as “announce” or “proclaim”, which Searle states is the most common error people make with Speech Act Theory, but looks at the illocutionary act in its entirety. This can only be done by looking at the wider context, especially, in the case of public relations campaigns, that of stated strategic goals and the authority of the organization and its spokespeople to perform the illocutionary act. This is where it particularly relates to intentional positioning efforts. The speech-act is more than the “propositional content” but also includes the concept of “illocutionary force” – the two together comprising the “illocutionary act” (Searle 1979, vii). The most important part of illocutionary force is what Searle calls the “illocutionary point” (1979, 3) i.e. what is the point or purpose of what is being said, as Searle (1979, 2) explains: The point or purpose of an order can be specified by saying that it is an attempt to get the hearer to do something. The point or purpose of a description is that it is a representation (true or false, accurate or inaccurate) of how something is. The point or purpose of a promise is that it is an undertaking of an obligation by the speaker to do something.

In general situations, most illocutionary acts are not intended to have specific perlocutionary effects but I would argue that in the context of public relations campaigns, most are intended to have such effects, i.e. to have target publics construct the meaning that public relations practitioners intend for them (James 2009). Bach (1998, np) states that “the perlocutionary act is a matter of trying to get the hearer to form some correlative attitude and in some cases to act in a certain way”. The evidence in this study indicates this is what organisations were attempting, and according to their evaluation statements, actually achieved.

At the third pole of the positioning triangle the storylines are invoked and are those developed and promulgated by the public relations practitioner to support the positioning. The storylines are determined by the first and second poles – hence the positioning triangle is a “mutually determining triad” (van Langenhove and Harré 1999, 18). To pursue storylines that are incongruent with the first two positioning triangle poles would mean the desired positioning would not be achieved. This links back to the role of key messages in public relations campaigns and the importance placed by practitioners on consistent messaging in supporting believability (Bruce & Tini 2008).

LIMITATIONS OF THIS RESEARCH AND THE FRAMEWORK

I am continuing to further develop and test the provisional conceptual framework and this work is ongoing. Some of the challenges posed by the inclusion of aspects of Speech Act Theory (Austin 1962; Searle 1979) into the framework are not straightforward, especially as they relate to the concept of perlocutionary effects and the active role of audiences in the co-construction of meaning. Some of the limitations of Speech Act Theory have been explored (e.g. Taillard 2000) and other scholars have added to, adapted or revised the Theory (e.g. Bach and Harnish 1979; Gu 1993; Hornsby 1994), but the tenet of Austin (1962) that words do not only describe things but that they also do things remains central. The author is currently examining the work of Taillard (2000) and others in examining the role of persuasion in intentional positioning.

APPLYING THE FRAMEWORK TO THE AWARD ENTRY DATA – FINDINGS AND DISCUSSION

Of the 21 award entries examined, 19 illustrated intentional positioning being undertaken when the framework was applied to the award entry data, i.e. the three positioning triangle poles were evident and were aligned, the positioning type and positioning purpose were identifiable and the positioning occurred within the context of the organization’s desire to achieve a specific goal. The two entries that were not included in these findings (2000 C9
and 1999 H8) were ambiguous as to whether they did or did not demonstrate positioning techniques so were omitted from this discussion. The next section will discuss the results in more detail and will primarily use only two of the award entries to illustrate the findings due to the constraints of word limits preventing more of the textual analysis to be included⁴. These two award entries were randomly selected as examples of a large and relatively small scale campaign. There was no evidence of differences between techniques used across the decade in which the award entries were submitted. Pertinent comments from the interview transcripts will also be included when they further illuminate how positioning is undertaken in government communications.

**The positioning triangle**
The three poles of the positioning triangle were evident and were aligned in each of the 19 award entries.

**Pole 1 of the triangle - Position determined**
Each of the award entries showed evidence of having a desired position as part of their campaign and the determining of this desired position was informed by research in all cases. This is not surprising as the Golden Target Award entry template dictates that the campaign research be detailed by the entrant, however, it was very clear that in the research, regard was given to the overall campaign goal and the relative actual and potential positions of publics and stakeholders. Wu (2007, 417) states that “the underlying reason for stakeholder analysis is to identify, position, understand and predict those conflicting and often contentious relationships among various constituents”. This is illustrated in the case of the lead up to the Sydney 2000 Olympic Games where the Olympic Roads and Transport Authority (ORTA) listed two “top line” objectives: positioning ORTA as a credible, professional organization and bringing the Sydney community from a position of apprehension about Olympic transport to a level of public confidence in transport strategies (1999 A 11). Thus ORTA had determined its desired position but had also determined the position of a key public – the transport users. However, a number of campaigns did not include the words “position” or “positioning” in the text but there was ample evidence that positioning was being undertaken when the framework was applied. For example, the City of Casey set out in a community relations communication program (2003 A 6) to eradicate all graffiti from its precincts. The program had three elements – “eradication, education and enforcement”. Graffiti was positioned as “not cool”, as “senseless vandalism” and was subject to “harsh penalties”. Although the word “positioning” was not used in the award entry, there were clear positioning elements evident when analysed using the framework for intentional positioning.

**Pole 2 of the triangle - Position enacted**
The second pole of the positioning triangle is when the desired position of the entity initiating the public relations activity is enacted through a speech-act. A speech act performs several acts simultaneously with the intent of the speaker being a key distinguishable factor. A speech act encompasses a) the act of saying something, b) what is being done by what is being said (such as declaring, requesting, promising), and c) how one is trying to affect one’s audience (Bach 1998). Each of the award entries had a clear strategic intent to persuade, educate, motivate and otherwise get target publics to co-construct meanings intended for them. One interview respondent stated: “Ninety percent of the time the messages or the positioning we put out is done to call people to action to do something” - Respondent D

Organizations, once having determined what position they desired, undertook some kind of speech act / action to enact that position, most often through statements to target publics made through direct communication channels or the media. All 19 enacted their positioning through the use of Assertives, which tell people how things are (Searle 1979, viii). For example, in the ORTA award entry (1999 A 11), the positioning was enacted via the delivery of a series of set-piece announcements, “each self-contained but designed to collectively provide a consistent and coherent picture of Olympic transport arrangements”.

However, in addition to using Assertives, in other cases the positioning was also enacted through requests, orders or propositions to target publics, in what could be termed Directives (Searle 1979). There were 14 of the 19 award entries that could be identified as having used Directives in their positioning efforts. Six of the 19 award entries showed evidence of using what Searle (1979) described as Commissives – where organizations committed to do something; 4 of the 19 award entries illustrated elements that could be identified as Expressives, where feelings and attitudes are expressed; and only two of the 19 award entries could be shown to have used Declaratives – these were both instances where laws were introduced to declare behavior illegal – one related to the City of Casey’s anti-graffiti campaign (2003 A 6) and one to the Victorian Department of Primary Industry’s control of Equine Influenza campaign (2008 C4-3). Only one award entry demonstrated all five of the speech act categories and this was in the City of Casey graffiti eradication campaign (2003 A 6). The positioning was enacted at the second pole through Assertives – stating the way things were regarding graffiti, its image, its consequences and the City’s eradication program; Directives – the City was trying to get young people to stop doing graffiti; Commissives – the City committed to removing all graffiti reported within 24 hours; Expressives – the attitude was expressed “graffiti is not cool” and, Declaratives – new local law restricting “the availability of aerosol spray cans”.

**Pole 3 of the triangle - Position storyline**
The third pole of the positioning triangle is the storyline, i.e. what storylines about the organization’s declared position will support the holding of that position. Harré and van Langenhove (1999) tell us that with certain positions come the rights to use certain storylines and that positioning will fail if storylines do not align with the position determined at the first pole and enacted at the second pole of the positioning triangle. Storylines in a public relations context are in large part the key messages developed and disseminated through various channels and tailored to the needs of particular audiences, e.g.

“We tend to work on three key messages that are your main themes of how you want to position this initiative and then the supporting facts that back up each of those would probably vary for audiences” – Respondent J

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⁴ The textual analysis of the other award entries is available on request to the author.
One interview respondent disagreed that it was about key messages, stating it was more about keeping to particular themes:

“I’m not that formal and I’m not that dogmatic about it, saying these words in these ways, although there are sometimes I would, but generally speaking there are the themes rather than a key message in my case… the theme is that these will do these things for you so I’m more likely to stick to the themes and I make it clear that we need to keep repeating that in different ways… this is how we are positioning ourselves about it and this is what we believe and when you speak about it you represent that view” - Respondent C

The following example indicates the process of determining the positioning of the organisation and how this led to the positioning enactment and the development of the supporting storyline:

The Hospital Board had identified a common vision for the Hospital’s redevelopment, but it needed to be clear on a preferred organisational position on the redevelopment. Socom [a PR agency] took this vision and developed the following key messages that underpinned all communications activities. (2007 C2 – 2)

The success of the campaign could be attributed to this strong underpinning – everything in the positioning triangle aligned. One local government interview respondent talked about the potential for issues and problems when the messages did not align with the rest of the campaign:

“Messages needs to gel with everything else that’s being put out there… because while the project manager may say okay this is what we want people to know, if you’ve got the mayor or the chairperson or somebody in the paper saying something completely different, it just, it erodes your credibility as a project team, but it also puts that councillor or mayor or whoever in a difficult position, because they’ve then got to explain why” - Respondent D

It is evident that inconsistent storylines start to “derail” the positioning strategy as the positioning triangle loses its stability. When Harré and van Langenhove (1999) discuss certain positions opening up the possibility of certain storylines, it also means that other storylines will be closed off. You can’t run storylines about being an environmentally friendly organization if you’ve determined a public position of profit maximization at any cost. It won’t “gel”. The respondent expanded on this point:

“There’s no point putting out a message, or positioning something in a way that it’s not because our stakeholders will always find out. There’s no point us saying okay we’re going to address something and then nothing ever being done about it because then that’ll result in a bigger furor at the end of the project than you ever had at the beginning” - Respondent D

The respondent was indicating that such a tactic wouldn’t make sense and it would raise questions in the minds of the media and other target publics – the positioning wouldn’t hold. Another interview respondent reinforced that the various aspects of the positioning must align:

“You could construct a campaign that links into their understanding of the good work the organisation does and if they believe what they know about the organisation, that it’s good, then that kind of translates to being able to build, well, a message that this must be okay too. And then if they believe that the x say it’s okay then it must be okay - so those two things coming in together position it as being okay” - Respondent J

This alignment of the storylines across various channels can be seen in the ORTA example (1999 A 11) - once announcements had been made about particular transport arrangements, spokespeople went on radio to explain what the arrangements were, how they’d be organized and how people could access transport across the city; media events and launches were held to show people the new fleets of buses coming to town; brochures were developed and distributed; homes along the Olympic routes were direct mailed information about impacts; community group information sessions were held and so on. In the City of Casey graffiti campaign (2003 A 6) the storylines at the third positioning triangle pole were delivered via key messages through media channels and education sessions with school students – telling people how to report graffiti, and educating about the costs and consequences of graffiti. This was supported through key messages in advertisements, fridge magnets, websites, visual displays and direct marketing. One prominent tactic was the development of a four-page comic and “pay if you spray” stickers distributed to school students. It can be seen that all poles of the triangle were aligned and this held the desired position for these organizations.

The positioning type

<table>
<thead>
<tr>
<th>Evidence</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>Evidence of situations of deliberate self positioning</td>
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<td>0</td>
</tr>
<tr>
<td>Evidence of situations of forced self positioning</td>
<td>5</td>
<td>14</td>
</tr>
<tr>
<td>Evidence of situations of deliberate positioning of others</td>
<td>14</td>
<td>5</td>
</tr>
<tr>
<td>Evidence of situations of forced positioning of others</td>
<td>7</td>
<td>12</td>
</tr>
</tbody>
</table>

There is evidence in all award entries that deliberate self positioning was occurring however there were also other types of positioning occurring concurrently in many cases. It is clear that in the ORTA award entry, the effort was primarily to deliberately “self-position” the organization as credible and professional and to deliberately position Sydneysiders (“others”) as needing to be patient - “ORTA has been careful to stress the difficulties to be faced and the need for public cooperation and patience” (1999 A 11). In the award entry text, it was clearly stated that the strategy to reposition Sydneysiders from “a position of apprehension to one of confidence” was about “underpromising and overdelivering”. The City of Casey deliberately self-positioned graffiti in order to facilitate its eradication but deliberately positioned others, such as the shopowners as having a part to play in the program due to the face that they had sold spray paint in the past but were now prevented from doing so by the introduction of the new legislation. Positioning purpose
Table 3 – Positioning purpose domain

<table>
<thead>
<tr>
<th>Evidence</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>Evidence of positioning for the purposes of ingratiation</td>
<td>0</td>
<td>19</td>
</tr>
<tr>
<td>Evidence of positioning for the purposes of intimidation</td>
<td>0</td>
<td>19</td>
</tr>
<tr>
<td>Evidence of positioning for the purposes of self promotion</td>
<td>8</td>
<td>11</td>
</tr>
<tr>
<td>Evidence of positioning for the purposes of exemplification</td>
<td>5</td>
<td>14</td>
</tr>
<tr>
<td>Evidence of positioning for the purposes of supplication</td>
<td>0</td>
<td>19</td>
</tr>
<tr>
<td>Evidence of position for the purposes of facilitation</td>
<td>17</td>
<td>2</td>
</tr>
</tbody>
</table>

This study of government agency/public sector communication campaigns confirms the need for the additional category of facilitation – many of the award entries could not be categorized as primarily self-promotion, exemplification, supplication, intimidation or ingratiation. In most cases, organizations in this study were aiming to facilitate an outcome – better transport, use of support services, secure water supply e.g. in the Brisbane Aquifer project (2007 C6-25), the Council did carry out positioning for the purposes of self-promotion (to better ensure re-election of Councillors) and possibly even exemplification (of best practice in water management) however positioning for the purposes of facilitation i.e. facilitating the provision of a safe water supply seems to be the primary purpose.

**Positioning goal**

Each of the positioning efforts in the award entries was related to specifically stated goals and objectives. The positioning was never undertaken in a “vacuum” but always occurred in the context of the organization’s strategic intent to achieve the stated goal/s.

**CONCLUSION**

Through the application of the positioning framework, evidence is presented that shows that the communication campaigns of the government agencies and public sector organizations intended to position their idea/s, their offering or their service in a particular way in the minds of target publics and that they employed a range of techniques to enact the intended positioning. The application of the provisional conceptual framework for intentional positioning in public relations (James, in press) to these examples of practice in government communications indicates that the framework can provide a useful tool for analyzing campaigns. Even in cases when there was no mention of the word “position” or a stated aim that positioning was being attempted, by applying the framework to a particular campaign, it can be determined whether positioning is taking place in a public relations context.

Positioning activities were employed to facilitate target publics constructing the meaning that the government agency/public sector organization intended for them – for example, that the local council is listening to its constituents; that living in Canberra would be a great thing to do; that building a new hospital on the current site would be the best outcome for all; that moving maternity services to a new location is safest for mothers and babies; that sending children to a particular government school saves parents’ money; that farmers need to consider their water needs; that it’s acceptable for young men to need support following disasters and that equine influenza outbreaks require certain measures to be taken by the community. These are in the main not marketing communication campaigns but campaigns designed to construct an “interpretive potential” (Neff 2008, 92) with a view to persuading or influencing identified target publics to view something a particular way or undertake a certain action, thus facilitating the achievement of specific organizational goals.

On the basis of the results and analysis, it can be concluded that the framework offers a more comprehensive approach to positioning than found in marketing models and also brings together elements identified by other public relations researchers in a single framework. The framework will need further testing and refinement but this study’s findings show that positioning is a significant part of government agency and public sector communication practice.

The author would like to express appreciation to her doctoral thesis supervisors, Associate Professor Marj Kibby, University of Newcastle, Australia, and Dr Christine Daymon, Curtin Business School, Australia, for their constructive feedback and guidance during my investigation of intentional positioning in public relations.
APPENDIX 1
Golden Target Award Winning Entries – Government agencies and public sector organisations

<table>
<thead>
<tr>
<th>CALL NO.*</th>
<th>CAMPAIGN TITLE</th>
<th>CLIENT</th>
<th>PR COMPANY</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. 1999 A11</td>
<td>A Prescription For (Disaster) Success</td>
<td>Olympic Roads and Transport Authority (ORTA)</td>
<td>Olympic Roads and Transport Authority (ORTA)</td>
</tr>
<tr>
<td>2. 2000 A17</td>
<td>Adult Prisoner Work Camps- Community Communications</td>
<td>Ministry For Justice</td>
<td>Ministry For Justice</td>
</tr>
<tr>
<td>3. 2003 B7</td>
<td>Australia Day - Celebrate What's Great</td>
<td>National Australia Day Council</td>
<td>The National Australia Day Council Communications and Marketing Team</td>
</tr>
<tr>
<td>4. 2003 F5</td>
<td>Ball bombings: Supporting Western Australians after the tragedy</td>
<td>Department for Community Development WA</td>
<td>Department for Community Development (Jane Machin-Everill)</td>
</tr>
<tr>
<td>5. 2007 C6-25</td>
<td>Brisbane Aquifer Project</td>
<td>Brisbane Water</td>
<td>Marcom Communication</td>
</tr>
<tr>
<td>6. 2007 C2-2</td>
<td>Can you see and hear us?</td>
<td>SOCOM</td>
<td>Eye and Ear Hospital</td>
</tr>
<tr>
<td>7. 2007 C7-7</td>
<td>Converting Staff Perceptions</td>
<td>Department of Water, Western Australia</td>
<td>Department of Water, Western Australia</td>
</tr>
<tr>
<td>8. 2003 G11</td>
<td>Don’t Let Another Year Go By</td>
<td>Northern Territory University</td>
<td>Northern Territory University (Tracy Jones)</td>
</tr>
<tr>
<td>9. 2004 C3</td>
<td>Engaging DPI Staff in the White Paper for Water</td>
<td>Department of Primary Industries (Vic)</td>
<td>Department of Primary Industries (Vic)</td>
</tr>
<tr>
<td>10. 2006 C15-3</td>
<td>Kaleeya Hospital Maternity Unit</td>
<td>South Metropolitan Area Health Service</td>
<td>Mills Wilson Communication Consultants</td>
</tr>
<tr>
<td>11. 2006 C1-5</td>
<td>Live in Canberra Campaign</td>
<td>ACT Government</td>
<td>ACT Government</td>
</tr>
<tr>
<td>13. 2006 C2-4</td>
<td>NoLink! Sorry, no service for outer Melbourne</td>
<td>Interface Councils</td>
<td>Socorn</td>
</tr>
<tr>
<td>14. 2006 C5-5</td>
<td>Promising Our Children a World-Class Hospital</td>
<td>Royal Children's Hospital</td>
<td>Socorn</td>
</tr>
<tr>
<td>15. 2007 C4-1</td>
<td>Returning Power to Collinsville</td>
<td>Ergon Energy</td>
<td>Powerlink Queensland</td>
</tr>
<tr>
<td>16. 2002 A17</td>
<td>Royal Visit To South Australia By Her Majesty The Queen And His Royal Highness The Duke Of Edinburgh</td>
<td>South Australia, Department of Premier and Cabinet</td>
<td>Public Relations Institute of Australia</td>
</tr>
<tr>
<td>17. 2000 C9</td>
<td>Show Cause</td>
<td>University of New South Wales</td>
<td>University of New South Wales</td>
</tr>
<tr>
<td>18. 2007 C6-26</td>
<td>Sir Samuel Griffith Drive Operation Review</td>
<td>MarCom Communication</td>
<td>MarCom Communication</td>
</tr>
<tr>
<td>19. 1999 H8</td>
<td>Take Control</td>
<td>Southbank Institute of TAFE</td>
<td>Media Link</td>
</tr>
<tr>
<td>20. 2003 A6</td>
<td>The Writing’s on the Wall - Casey stamps out graffiti</td>
<td>City of Casey, Victoria</td>
<td>City of Casey, Victoria (Ros Weidman)</td>
</tr>
<tr>
<td>21. 2008 C4-3</td>
<td>Equine Influenza - Victoria</td>
<td>BiosecurityVictoria</td>
<td>Department of Primary Industries</td>
</tr>
</tbody>
</table>

* Call nos. are those listed on the database of award entries at www.lib.uts.edu.au/gta/ and can be used to retrieve the award entries included in the study.

REFERENCES


RTI Clinic Checkup: Can a Campaign to Increase Awareness of India’s Right to Information Legislation in Orissa Succeed?

by Philippa Brear

RTI: SETTING THE SCENE

Imagine you are a subsistence worker in Orissa, an eastern state in India, and one of the country's poorest. Through your local council, you apply for and gain a place in the National Rural Employment Guarantee Scheme – which effectively guarantees 100 hours employment a year to anyone who asks for it. It is not the kind of work many people want – road building, ditch digging and so on – but it is the type of work people with no other income will do. So, you do your work, but no payment is forthcoming. Your local government authority knows nothing about it. You cannot read or write, and you have no way to contact the scheme administrators, who are based in a distant city. Even if you had the means by which make contact, you would not know whom to contact.

Under India’s Right to Information (RTI) legislation you could file an application to a public information officer of the scheme, and ask a series of questions relating to receipt of money for your labour. While your application cannot accuse anybody of not paying you, it can ask for information about the work that was done, the processing of payment for it, and records and dates of payments made. It is possible that merely making the enquiry, you will prompt whoever is responsible to ensure you are paid. But if the public information officer in question does not respond, refuses to respond, or provides information that is not accurate, you can appeal to an information commissioner. If there is a determination against the officer, they can be personally liable. That’s how RTI should work.

However, the problem is that you have to know that the legislation exists; you have to know how to go about making an RTI application, including how to craft questions properly; and you have to have the means, financial and otherwise, to do it. That’s where RTI clinics can help. It also helps if the public information officer understands the scrutiny an RTI application can bring, and that he or she should take it seriously. As a government official, ideally they should understand that RTI is about promoting transparency in government and democracy, and that these goals are shared and taken seriously by their peers, their bosses, and politicians and voters.
India’s RTI legislation, enacted in 2005, is designed to give citizens the right to question government officials about their performance with a view to improving public service, and to root out corruption and incompetence. The laws have effect in all states except Jammu and Kashmir1, which has its own version of RTI, and apply to the bulk of paper-based and electronic information kept by public agencies as well as private organisations substantially funded by government. There are exemptions such as materials relating to national security or trade secrets. Government officials who delay providing information, provide misinformation or refuse to handover records without reason can be fined. While RTI legislation has national effect, and a central office administers the legislation, its regulations are generally enforced at state level, through information commissions connected to nodal state government departments – in the case of Orissa, interestingly, the Ministry of Information and Public Relations (although it varies in other states). Education and awareness building are key elements of these commissions’ mandates.2

The catalyst for the RTI legislation came from Indian state Rajasthan, where a 1990s grassroots movement, the Mazdoor Kisan Shakti Sangathan (MKSS), which translates as Organization for the Empowerment of Workers and Peasants, exposed local corruption. RTI researcher Rob Jenkins discusses a “new type of anticorruption activism” emerging in the mid-1990s. Rather than focusing on the collective misdeeds of a ruling party, or directing their energies toward the strengthening of the regulatory oversight bureaucracy, the new activism aimed to expose specific acts of corruption and to focus on the local level, where corruption was routine (Jenkins, 59). Jenkins and Anne Marie Goetz pinpoint the MKSS’s interest in the right to information arising from its work in the 1980s and 1990s on livelihood issues, such as the failure of the state government to enforce minimum-wage regulations on drought-relief works, to ensure availability of subsidised food and other essential commodities through the Public Distribution System (PDS), or to prevent the illegal occupation of government land. They note that the MKSS’s efforts around wages and prices generated a belief that access to official documents was an essential part of the struggle to demand accountability from local authorities (Jenkins and Goetz 1999).

There is plenty of literature attesting to the endemic corruption of public administration in India. Bureaucrat turned writer and activist Harsh Mander describes the “dynamics of corruption”, listing widely-known practices including “speed money”, paid to overcome delays in government processes; “goodwill money” paid to maintain favourable relationships with officials; “end money” paid to achieve a specific outcome; and blackmail, where government officials target members of the public about whom they have confidential information (Mander, 148).

The Association for Democratic Reform bases its research about politicians on tax documents and affidavits supplied by MPs themselves. Referring to the 2009 Lok Sabha, India’s house of representatives, the ADR reported that 161 members of parliament (of 543 members in total) had criminal cases pending against them, and 75 of these MPs faced “serious” offences. This compared with 2004, for example, when 128 MPs had criminal cases pending against them. In the interim, interestingly, the RTI legislation had been enacted. The ADR’s 2009 figures also found that 314 MPs were crorepatis, India’s equivalent of millionaires (Association for Democratic Reform).3

NGO Social Watch India monitors parliamentary activity, one aspect is committee attendance: “The continuing absenteeism at these Committee meetings should be a cause of worry. On an average, most of the committees record only about 45 to 50 per cent attendance. During the 12th session of the 13th Lok Sabha, for example, the financial committees recorded an average attendance of 51 per cent. Among the standing committees, the Committee on Railway recorded the lowest attendance during the year, a mere 14 per cent.”

MKSS figures Nikhil Dey and Aruna Roy, among others, continue to be driving forces behind RTI. As Dey has said: “All human rights depend on the basic right to know, to demand accountability. In India, the feudal social fabric has exploited the formal democratic system to its advantage because the literate are too busy building careers and empires to bother about social inadequacies. That’s why RTI has a widespread appeal for everyone.” Dey’s observation has resonance in a state like Orissa, where 35 per cent of the general population is illiterate (Orissa Government). The backing of eminent media figures and academics gave the MKSS campaign further momentum and potential to be, as Dey has put it, “a second war of independence”. The support of the Press Council of India gave the movement national prominence (Mahaan).

In 2009 the Government of India announced its intention to amend the RTI laws – mooted by the President in her speech at the opening of parliament. In response, a group of 200 prominent citizens, including activists Dey and Roy, published an “open letter” in The Hindu on 25 October 2009, expressing their concern that the Government intended to create an exemption for “frivolous and vexatious” applications, which it cited as impediments to implementation of the legislation. The letter pressed for the national government not to amend the legislation until the findings of two major reports about RTI implementation were addressed.

The reports in question – in fact – identified lack of awareness of RTI laws, among other factors, as more significant constraints on citizens exercising their right to information under the legislation. The first report was commissioned by the Government of India, and completed by international firm PriceWaterhouseCoopers (PWC), its final report published

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1 Under the Constitution of India, the legislature of Jammu and Kashmir must separately ratify national Indian laws – except those relating to defence, foreign affairs and communications – for them to have effect in that State.

2 Section 26(1) A of the RTI Act allocates responsibility of the relevant government to develop and organise educational programs to advance public understanding of the legislation, particularly among disadvantaged communities.

3 The television game show Who Wants to be a Millionaire was known as Kaun Banega Crorepati in India, and famously depicted in the film Slumdog Millionaire.
in June 2009. The other, partially funded by the Google Foundation (Frammolino, 42), was undertaken by a coalition of NGOs under the banner of the RTI Assessment and Analysis Group (RAAG), and published in October 2009. Both reports have determined that the legislation registers low public awareness, with PWC citing overall awareness across five states of 27 per cent of the general population and 13 per cent in rural areas (PriceWaterhouseCoopers, 38). The RAAG report notes: "In nearly 40% of the over 140 FGDs [focus group discussions] in district headquarters, at least one or more person knew about the RTI Act. However, in only 20% of the over 400 FGDS organized in villages was there even a single person who knew about the RTI Act" (RAAG, 7).

Orissa was prominent in the report, having featured in both report samples. It is a poor state, with a population of around 40 million, with high illiteracy – the levels skewed even higher in rural areas (Orissa Government). In particular, according to the 2001 census, 65 percent of Orissa's scheduled tribe peoples, who constitute over 20 per cent of the state's population, cannot read or write (Registrar General). Further, Orissa currently ranks 12th on the India State Hunger Index (International Food Policy Research Institute, 15), and has the highest infant mortality rate in India – in 2009 UNICEF reports 52 deaths per 1000 live births (UNICEF India). So, while one of the aims of RTI legislation is to promote democracy and ultimately improve the standards of living of Orissans, acute poverty presents significant challenges in educating them about their rights under RTI – many are simply concerned with survival.

However, as Orissa Information Commissioner Shri Jagadananda has put it: “People who have access to information and who understand how to make use of the acquired information in the processes of exercising their political, economic and legal rights become empowered … to improve the quality of life … The RTI Act provides a framework for promotion of citizen-Government partnership in designing and implementation of development programmes for improving quality of life, which calls for increasing people’s options for higher earnings, better education and health care, a cleaner environment and a richer cultural life” (Jagadananda, 1).

This case study considers proposals for a public relations campaign to increase awareness of RTI legislation by the Orissa Information Commission (OIC). The OIC is a statutory authority, and therefore a government-funded independent public body, in this case charged with implementing and promoting the legislation in the eastern India state. The discussion will consider if the campaign can succeed by referring to conditions for success of public communication campaigns – namely that there are realistic goals; communication campaigns set out by Mendelsohn in his oft-cited 1973 article, and more specifically that the campaign can succeed – whether it has the ingredients to indicate it can be effective. There is also value in reflecting on what “success” means in these circumstances. Is it achieving defined strategic objectives? Or, is it simply making some progress in the desired direction – at least sufficient progress to justify the resources devoted to the campaign? William Paisley notes: “Reform, defined as an action that makes society or the lives of individuals better, is a unifying principle of public communication campaigns” (Paisley, 5). A campaign promoting RTI awareness in Orissa falls within this ambit.

As Rice and Atkin have noted: “Campaign objectives and criteria for success should be reasonable … many public communication campaigns have typically set higher standards for success than the most successful commercial campaigns” (Rice and Atkin 1989, 10). In any case, one would hope this discussion and the ideas it raises will provide strategists of the OIC, Orissa NGOs and RTI activist community with a means to reflect on their current and proposed awareness-raising efforts.

**RTI AWARENESS RAISING: GOAL SETTING**

As mentioned, implementation of the RTI legislation primarily sits at state level, and in Orissa it falls to the Orissa Information Commission (OIC). There is a Chief Information Commissioner, and there can be up to 10 Information Commissioners. Jagadananda, appointed in 2008, has a background is in the civil society movement, notably with Orissa's Centre for Youth and Social Development. He has been the only Information Commissioner since then, although a second commissioner has just been appointed – to the displeasure of activists who see his background as an Orissa bureaucrat as inappropriate (Indian Express, 16 April 2010).

Sweeping allusions to the mandate of the “information” bureaucracy to educate Indians about RTI legislation and how to use it have not been conducive to setting specific and achievable objectives in this regard. OIC documents about communication and awareness raising to which I have had access do not isolate specific communication objectives – rather they focus on more general goals, such as that Orissans should have reasonable access to RTI, be able to use it and achieve appropriate RTI outcomes in reasonable time frames. While awareness is seen as integral to this, as demonstrated by findings in the PWC and RAAG reports, awareness levels are not a measure by which the Information bureaucrats are judged.

Jagadananda has noted that special intervention is needed in Orissa – in his words: “In order to address the backwardness, the issue of acute poverty; poor human development conditions and the desire to fast track the development, Orissa requires a multi faceted strategy.” He notes that the “most disadvantaged and illiterate people” need to be aware of the legislation and how to use it. One obstacle is that the OIC does not have its own
public relations officer, and the commissioners’ time is divided between his role as a hearing commissioner, regulator, manager and educator. Against a backdrop of low awareness of the legislation among disadvantaged people, Jagadananda points to the complexities of the application process itself: “This is reducing RTI to be an affair of elite, urban, educated middle class” (Jagadananda, 1). A document prepared by the Director of Strategic Communications and External Relations of the Canadian Information Commissioner Office for the OIC notes: “… the task is to make the 36 million people of Orissa, most of whom live in small rural or tribal villages, aware of their rights to information” (Boisclair).

Established in 2009 by NGO the Public Cause Research Foundation, India’s RTI Awards recognise information commissioners, public information officers (the organisational officers charged with responding to RTI applications) and citizens. The information commissioner’s role, as noted in the report of the RTI Awards committee, is quasi-judicial, in hearing disputes about whether or not information should be provided; regulatory, in ensuring appellants receive information to which they are entitled; and to deter, in penalising officials for violations of the Act (RTI Awards, 13). They judge commissioners’ performance on the basis of pro-disclosure factor; deterrent impact; effectiveness; overall public satisfaction, and pendency. The “winning” Information Commission, Arunachal Pradesh, is cited as: “…a shining example of how a state commission can perform well even with limited resources” (RTI Awards, 31). Orissa has a high pendency of cases – that is many cases pending that have not been cleared – which points to one reason for another commissioner to be appointed. The state sits in the mid-range of other measures (RTI Awards, 217).

As a platform for scrutiny of individual state bureaucracies, the awards are themselves an awareness-raising tool – but they also provide a vehicle for further media coverage of the effectiveness of implementation of the legislation. With high-profile actor Aamir Khan on the jury, the National RTI Awards were broadcast on NDTV. Interestingly, there is also an RTI film festival run with the stated purpose of being a communications initiative, supporting grassroots efforts to promote awareness, facilitating access to RTI machinery and promoting stakeholder interaction (RTI Film Festival). In a country enamoured of cinema, this is a powerful way for the RTI message to reach a mass audience, including illiterate people. For the sake of argument, then, if one accepts that any increase in awareness of RTI among Orissans is a “success” – I hark back to Rice and Atkin’s cautioning words – then it is worth considering other factors, particular to Orissa, that might drive or hinder this.

The considerable levels of illiteracy and poverty in Orissa have already been mentioned, and are pivotal in this discussion. As the OIC’s Jagadananda has put it: “Despite planned efforts of six decades, over 40% of the total population [of Orissa] is poor, un-healthy and illiterate. In order to rectify the deficiencies in the mechanisms for ensuring the reach of the entitlements, particularly the basic human needs, the people in general and Civil Society in particular demanded for greater access to the information held by the public bodies … In order to address the backwardness, the issue of acute poverty; poor human development conditions and the desire to fast track the development, Orissa requires a multi faceted strategy” (Jagadananda, 1). Obviously illiteracy and poverty are skewed toward communities in rural Orissa, some of them very isolated. Orissa is about 156,000km², larger than either England or Bangladesh (and nearly eight times the size of Slovenia), and has 30 districts. While Orissa is a poor state, it is resource rich, with coal, iron ore, and chromite and bauxite reserves. It was one of the first Indian states to take advantage of India’s economic liberalisation, when it privatised electricity transmission and distribution in the 1990s. In addition to India companies, there is significant foreign investment in Orissa. The Government of India has agreed to accord Special Economic Zone status to eight sites in Orissa, but has met opposition from local communities and NGOs over human rights violations. Orissa recorded the second highest level of inward investment for individual states, according to a report of ASSOCHAM, which also noted its rich mineral resources and availability of a cheap workforce as chief attractions for investors. A World Bank Institute Research team reports the rate of economic growth has increased from 4 per cent in the 1990s to about 8.5 per cent over the past five years, compared to an all-India average of 7.8 per cent (Lee et al). Further, according to the WBI team, economic reforms have led to a significant decline in the cost of doing business in Orissa – for example the researchers determined it took 52 days to start a business in 2008 compared 79 days in 2004.

Villagers attacked a group of Vedanta corporate social responsibility representatives in February 2010 in the Niyamgiri Hills. The attack is widely noted to be the first direct violence the company has faced since its operations began there in 2004. The jeep containing the Vedanta team (not seriously injured) was ambushed and set alight as it returned from a local meeting. Writing about a recent investigative trip to neighbouring state Chhattisgarh, Roy noted: “…a massive billboard advertises Vedanta (the company our home minister once worked with) Cancer Hospital. In Orissa, where it is mining bauxite, Vedanta is financing a university. In these creeping, innocuous ways, mining corporations enter our imaginations: the Gentle Giants Who Really Care. It’s called CSR, Corporate Social Responsibility” (Roy 2010).

The attack on the Vedanta team might have been the work of villagers, but it is also connected to the Naxalite movement – a collective term for anti-government armed groups active in some central and eastern states of India, including Orissa. Roy’s field trip, controversially, was at the invitation of a group of Naxalites. Dating back to the 1960s, the Naxalites have communist origins. The movement now numbers tens of thousands of members who

6 A Survival International film Mine: story of a sacred mountain about the Dongria Kondh has narrated by British actress Joanna Lumley.
7 The movement is named for Naxalbari in West Bengal, where it is said to have started.
effectively control whole parts of several states, including Orissa. Assassinations attributed to Naxalites number over 6,000 – citizens, soldiers and government officials. In early April 2010, 76 government paramilitary personnel were attacked and assassinated by a Naxalite group of 1,000 in neighbouring state Chhattisgarh. In 2006 Prime Minister Manmohan Singh labeled the Naxalites “the single biggest internal security challenge ever faced by our country.”

The Naxalites do not have one particular enemy – each group has its own cause or particular objective, but their shared purpose is to oppose established or mainstream social, political and economic structures. Activists in Orissa assassinated an Australian missionary and his two sons, both aged under ten, in 1999. The missionary had worked with tribal groups there since the 1960s. Is it not farfetched, therefore, to suggest that such groups pose a threat to NGO representatives and government officials working in the field – even those promoting RTI, because it is a mechanism of government. RTI is an enabler of democracy – and it is interesting, therefore, to note that Naxalites groups in Orissa are based in the rural communities that are integral to the awareness-raising activities of the OIC, NGOs and other civil society activists.

RTI AWARENESS RAISING: TARGET PUBLICS

Based on my own observations during a visit to Orissa in January 2010, it is clear that NGOs and the OIC have clearly defined the publics they need to target in increasing awareness of RTI in Orissa. Both groups know their State and the issue. Susie Price, based with NGO Antodaya in Bhawanipatna in the Kalahandi district, suggests that NGOs see the target publics for RTI awareness as those they broadly define as “disadvantaged” but with a focus on tribal and scheduled castes; people with disabilities; and people with HIV/AIDS.

NGOs also highlight disadvantage by gender. Price has noted: “By default if you’re female you’re disadvantaged whatever your other problems. In Orissa, which is a very conservative area – if you’re a woman you’re very much under your husband’s/father’s shadow … you don’t control your own money, you don’t go out very often if at all without your husband, you’re last in line for food etc, if there’s an issue about going to school, boys will be allowed to go before girls … As a result encouraging women to file an RTI application is an uphill battle but we’re keeping it high on the agenda … women in the tribal communities have significantly more freedom than their largely Hindu/Sikh counterparts although there is still a very clear division in labour etc” (Price [3]). The PWC report notes average awareness levels of women across the five states it surveyed as 12 per cent, compared to 26 per cent among men (PWC, 38).

The OIC has identified internal and external publics in its strategic planning process. Internal publics include the Commission itself and other information commissions around India, as well as public sector agencies and the Orissa Government. But it also sees government officials as an external public, in particular identifying policy makers and high-ranked officials. It also categorises RTI activists and the civil society movement, or NGOs, as external publics. In terms of the population of Orissa, it segments them into illiterate and disadvantaged rural communities, the urban lower class, the urban middle class, the “elite”, RTI activists and the media (Orissa Information Commission [1]).

Further, in devising messages for target publics, the OIC specifies citizens; public authorities; and the media as target publics. The messages it has crafted focus on empowerment for citizens as well as education about the RTI mechanism itself. For the bureaucracy, the message is the “carrot” for the “stick” of regulation the laws are intended to provide – that government officials should see informed citizens as their allies, who can help bureaucrats do their job better and to see RTI as a means through which they can provide service to the community, and gain recognition for doing it (Orissa Information Commission [2]).

RTI AWARENESS RAISING: COMMUNICATION CHANNELS AND TACTICS

The RAAG report attributes awareness of RTI in rural areas to newspapers (35 per cent), television and radio (10 per cent), community word-of-mouth (10 per cent) and NGOs (five per cent). Among urban RTI applicants, 30 per cent gained awareness through newspapers, 20 per cent from NGOs and about the same from television, and 10 per cent through word-of-mouth (RAAG, 7). These broad-brush findings suggest Mendelsohn’s complementary communication forces at work – mass media and more individual interpersonal communication channels.

A survey conducted by odisha.com9 provided media analysis for the more broad-ranging RAAG report. It surveyed publications – both English and Oriya language – between August and October 2008, and concluded that the Oriya language publications were more active than English language publications in “educating readers about the RTI Act and how specially [sic] they might use it” (odisha.com). The survey pointed to coverage of urban and rural awareness-raising campaigns, as well as case studies, and noted The Dharitri, a vernacular newspaper, was a media partner in a 15-day national campaign Drive Against Bribe. However, the report also highlighted that while there are 30 districts in the State, articles related to activities in only a few districts, attributing this to the fact that RTI activist projects were focused on those districts.

An example of how media coverage works hand-in-hand with grassroots awareness raising and research is demonstrated in an article published online in the Indian Express, an English-language online newspaper. The article, published in December 2009, reported on the findings of a CYSD “baseline study” presented at a State convention on RTI. The study

8 In 2006 the World Health Organisation identified Orissa as one of four India states with districts with particularly high prevalence of HIV.

9 In late 2009 the State Government approved changing the name of the State from Orissa to Odisha, along similar lines as the name change of Bombay to Mumbai. Approval at national level is necessary for the change to take effect.
found that Orissans are unaware of the entire chain of citizens’ rights under RTI starting from application to complaint and appeal. It went on to note that in villages of Koraput [a district of Orissa] eight per cent of people were aware of RTI; 17 per cent had heard of the Act in Keonjhar and Mayurbhanj districts, and 11 per cent in Sundargarh. Interestingly, the fieldwork focused on surveying women-led groups (Indian Express), a key target group of existing NGO communication strategies. As Price notes, NGOs see building awareness of RTI in Orissa in two parts – communication and awareness raising with the broader community, and tactics focused on the most disadvantaged people.

With the stretched resources of the OIC, it is not surprising that Jagadananda last year instigated the formation of a consortium of NGOs to promote RTI, known as the Orissa RTI Coalition, whose work complements the education remit of the Commission. The coalition includes 11 NGOs in Orissa whose role is to facilitate the introduction of RTI into Orissa communities. The main activity of the consortium is conducting workshops, known as RTI clinics, mostly in rural communities, where scheduled caste and tribe peoples are concentrated. The clinics allow people to find out about their rights and help them make effective RTI applications. They also provide a forum where volunteers within the communities can be identified to act as sponsors and to provide ongoing support.

There is no direct funding for RTI clinics, so the NGOs are being encouraged to run clinics on the back of existing programs – and therefore the coalition members take different approaches. For example at a local, usually weekly, market the Centre for Community Development (CCD) will set up a stall and promote RTI. Panchayats (local government) have resource centres, effectively town halls or meeting places, which typically contain a library, community computer and so on. These have served as venues for clinics run by the Centre for Youth and Social Development. The coalition is also considering an SMS campaign – in India the mobile phone is pervasive and many Indians use SMS for sophisticated applications such as phone banking; a website aimed at consortium members and urban middle-class Orissans (who might be bureaucrats themselves), who can also be advocates for RTI; telephone help-lines; and a community radio campaign.

Orissa has received United Nations aid through the Millennium Development Goals. Funding has targeted areas including capacity building for access to information – a project to build government officials’ capacity as information providers and citizens as information seekers. This project also aims to establish mechanisms for better government-citizen dialogue, laying the groundwork for Right to Information. Funding also specifically addresses improving citizens’ access to information, by creating more open governance. It aims to make government participatory, increase transparency, and thereby deter the arbitrary exercise of official power. This is to be achieved through educating and sensitising government officials; increasing the awareness of citizens; and building citizens’ capacity to make reasonable demands for information. An example of a UN-funded program in Orissa is Every Village a Knowledge Centre, with a network of 73 kiosks in 12 districts of Orissa set up with the partnership of government and NGOs; the goal being 150 knowledge centres with outreach to 1500 villages in Orissa by end of 2007 (United Nations). It is not clear whether this goal was attained.

Public communication campaigns are frequently criticised for being effective because they combine television or radio announcements with newspaper advertisements, but do little to follow up and personalise messages for specific target publics (if they are even defined). With RTI promotion in Orissa, the reverse seems true – certainly that is my observation. There is no shortage of strategists and activists, and manpower is cheap. The grassroots are being “tended” by an organised force – which is not to detract from the magnitude of the challenge they face in a geographic area of this size, with its large, spread-out community. There are volunteers throughout the State to staff RTI clinics, attend training sessions, organise local communities and promote RTI in concert with other civil society concerns and priorities. But even with the support of online, national and Orissa-based news media, and a television network that broadcasts the RTI Awards, a key issue in this case is one of a lack of mass communication specifically designed to complement current grassroots efforts in the State.

PWC’s report recommends a “massive awareness campaign” for rural and urban communities, and specifies it should be run at national and state levels. At the state level is lists communication channels such as workshops and street plays, press advertisements, and a customised media strategy (PWC, 71). The coalition’s plans are consistent with this, for example its hopes to organise community radio and SMS campaigns – although even these channels would only reach a relatively small proportion of the Orissa population. The coalition cannot, of course, countenance television, radio and newspaper advertising, due to the prohibitive cost.

Nevertheless, the aspirations of the coalition are more formed and grounded in experience that those of the OIC. With all the instincts and the good intentions it has, the Commission does not have the resources to complete drafting a strategy, much less recruit an officer to implement it. But it has been resourceful in aligning itself with activists and NGOs, to guide (to the extent it is able) and harness the benefits of their activities.

There are success stories – many reported by the Orissa RTI Coalition, and among them: “Chakradhar Tripathi was a regular recipient of the old age pension but over a year ago suddenly stopped receiving the payment. He visited the RTI clinic and with the help of the volunteers filed an application requesting information on reasons for the pension being stopped. Following his application, his query was raised with higher officials which resulted in an order being issued to the Panchayat to reinstate payment”.11

10 The coalition includes NGOs Adhar, CYSD, Patang, Anodaya, Gram Vikas, Orissa Soochana Adikar, the Centre for Community Development and Udyama, among others.

11 For a person who has applied for a disability pension and not received it, for instance, the coalition newsletter lists recommended questions along the lines of “What is the daily progress report of the application; How many days was the application with the official; What has the official done with the application; By what date will a decision be taken?” and so on.

12 The story of Bapu, a migrant worker from another poor Indian state, Bihar, who accesses banking facilities via his mobile phone is in a report about the phenomenon of remittances aired by the Australian Broadcasting Corporation.
REFERENCES


Boisclair, Thérèse, Untitled and undated note, Strategic Communications and External Relations, Information Commissioner Office, Ottawa, Canada


Jagadananda Strengthening Information Regime Draft note 13 April 2010

Jenkins, Rob, “Civil Society versus Corruption: India’s Unlikely Democracy”, Journal of Democracy, Volume 18, Number 2, April 2007, pp.55-69

Jenkins, Rob; Goetz, Anne Marie, “Accounts and accountability: Theoretical implications of the right-to-information”, Third World Quarterly; Jun 1999; 20, 3, p.603

Lee, Une J; Churamani, Pooja; Humme, Alexandra “Team Orissa” Gearing up to do business more efficiently World Bank Institute, September 2008 accessed at <http://go.worldbank.org/L56DWMMLA0> 12 April 2010

Mander, Harsh “Corruption and the Right to Information” in Tandon, Rajesh and Mohanty, Ranjita


Office of the Registrar General, India Orissa Data Highlights: the Scheduled Tribes Census of India 2001 <censusindia.gov.in/Table_Published/SCST/dh_st_orissa.pdf> downloaded 12 April 2010

Orissa Information Commission, Communication strategy for IC, undated document

Orissa Information Commission, Key Communication Messages, undated document

Orissa Information Commission website accessed at <http://orissasoochanacommission.nic.in/>

Orissa RTI Coalition Newsletter September 2009, Volume 1, Issue 1


Price, Susie, personal correspondence, dated 10, 11, 12 November 2010


RTI Assessment & Analysis Group (RAAG) and National Campaign for People’s Right to Information (NCPRI) Safeguarding the Right to Information: Report of the People’s RTI Assessment October 2009 downloaded from <http://rti-assessment.org/> 10 March 2010


Roy, Arundhati, Listening to Grasshoppers: field notes on democracy; 2009, Hamish Hamilton, London


Windahl, Sven and Signitzer, Benno H with Olsen, Jean T, Using Communication Theory, SAGE Publications Inc, 2nd ed, 2009, UK

World Health Organisation – 2.5 million people in India living with HIV, according to new estimates: Improved data from more sources gives better understanding of AIDS epidemic in India Media release 6 July 2007 accessed at <http://www.searo.who.int/EN/Section10/Section18/Section2414.htm> 12 April 2010
Stakeholders’ Inclusion: More Than a Cup of Tea? 
An Evaluation Model for Interactive Decision Making

by Paolo Fedele and Mario Ianniello

INTRODUCTION

Interactive decision making has become a recurrent practice, especially in local governments (Edelenbos, 1999; Klijn, 2008). Many administrations, in fact, involve citizens, social organizations and broadly speaking stakeholders, in the early stages of policy making, before the development of policy proposals (Kickert, Klijn & Koppenjan, 1997; McLaverty, 2002). The intended purpose is to adopt better and more democratic policy decisions, avoiding recurrent problems encountered in usual “go alone” decision-making (Edelenbos and Klijn, 2005); at the same time, interactive decision-making may enhance public administrations’ intangible assets (Coglianese, 2002; Irving & Stansbury, 2004) and establish bridging relationships with publics (Van den Bosch & Van Riel, 1998). Generally speaking, stakeholders might provide decision makers with information they lack, leading to more informed solutions; conflicts and use of veto powers might be prevented through information and consultation (Bobbio, 2005); citizen and social organizations might support the implementation of policies that are regarded as more democratic and legitimate. Interaction can take place through many organisational arrangements: public hearings, referendum, participatory planning procedures, citizens’ juries, etc (Oecd 2001, Bobbio, 2005). On the other side, interactive policy making is not riskless. Decisions on who or what group constitutes a stakeholder to be consulted arises problems of democratic accountability (Barnes et al., 2003); vested interests could affect decisions; decision making process might become too time consuming (Irving & Stansbury, 2004).

Although interactive policy-making has been largely debated, how to evaluate its effects is still under-analyzed (Koppenjan, 2008). The present article tries to conceptually and empirically contribute to this debate. More specifically, the main research questions the paper addresses is: how do organizational arrangements influence the outcomes of interactive policy making? The article propose, consequently, that the organizational structures adopted in practice to manage an interactive process influences significantly its results, although mediated by some contextual factors. In other terms, we base our analysis on two assumptions: the importance of network management (Kickert et al, 1997; Klijn 2008) and the influence of formal organizational structure in shaping behaviours (Egeberg 2003). In the light of this assumption, a model for qualitative analysis has been developed, mainly enriching some previous contributions in public administration literature. Subsequently, the model has been used to analyze a pilot case study as a preliminary step of a broader multi-case research project. Here we present for discussion the conceptual model and the results of the test on the pilot case study.
THEORETICAL FRAMEWORK: NETWORKS GOVERNANCE, INTERACTIVE DECISION MAKING AND EVALUATION

The present article refers, broadly speaking, to the governance literature and, more specific to the mainstream focused on governance networks (for an overview on governance literature in public administration studies see Rhodes, 1996 and Kljin, 2008). Interactive policy making, in fact, implies that public policies are the outcome of the interactions between interdependent actors (Kickert et. al., 1997). Contributions from public relations complement the main disciplinary approach (public administration and public management); other relevant streams of literature, mainly rooted in political science, have not been employed here, although largely influential.

Governance and governance networks have been so largely debated to the extent of becoming a case of conceptual stretching (Sartori, 1991). This article focuses on a specific aspect of this academic debate, which seems to be relevant (at least in some research agendas): the evaluation of networks. The matter, to some extent is quite simple: since networks affect decisions on public policies and public money spending, is there a way to evaluate them? Quoting a meaningful metaphor (Keast et al. 2002): are network only about drinking cup of tea or are they about performance? If networks have to be evaluated, criteria for evaluation need to be proposed.

Interactive decision-making is different from traditional hierarchical approaches, but is still – although not only - about “making decisions”. Consequently, the adoption of a shared decision is one of the main purposes.

On the other hand, evaluation against a set of ex ante formulated objectives (the most recurrent criteria in public management) can hardly apply to networks (reasons have been clarified by Koppenjan, 2003). So how to further evaluate network? The answer provided by many contributors is that evaluation has to be about interaction, since the latter is the differential features of interactive decision making. In this light, satisfaction or actor contentment - with regard both to process and decisions- (Klijn & Teisman 1997) have been proposed as evaluation criteria. Satisfaction has been largely debated in public relation studies (i.a. Hon and Grunig 1999, Grunig 2002, Bruning 2002, Bruning and Ledingham 2002, ); broadly speaking it implies reinforced, a satisfying relationship occurs when each party believes the other is engaging in positive steps to maintain the relationship (Grunig 2002).

Satisfaction as a measure for evaluating interactive processes has many pitfalls (for a review see Coglianese, 2002); nonetheless, it is recurrently adopted as evaluative criteria.

Other evaluating factors matters, though. In particular, interactive policy-making can create and consolidate an intangible asset: increased trust between governments and citizens, (Coglianese, 2002; Irving & Stansbury, 2004). This is why we assume that consolidation of trust is another evaluative criteria interactive policy making should be measured against.

At the core of the concept of trust there is the level of confidence that actors have in each other and their willingness to open themselves to the others (Grunig 2002).

If shared decision, contentment and trust are - in a broader sense- the dependent variables, many factor might be considered as antecedents of these outcomes. In an approach focused on instrumental rationality and mainly embedded in a logic of consequences (for an overview of different streams in organization theory for the study of the public sector, see Christensen et al., 2007), formal-structural organisational designs have an influence on how decisions are taken: since actors cannot deploy full rationality in their choices (Simon 1947), they need selection mechanisms in decision making behaviours: the formal organizational structure provides some selecting mechanisms. This is why, in the analysis model, we analyse the relation of the above mentioned outcomes of the interactive process to the organizational arrangement adopted to manage the process.

METHODOLOGY

Research approach and strategy
The research has been carried out through a multiple case study. The strength and weaknesses of this approach are well known, and we adopted an iterative approach aiming at literal and theoretical replication (Eisenhardt 1989, Yin 2003). We adopted a ‘structured’ approach to case studies data analysis (Eisenhardt, 1989), in order to identify and measure constructs. This approach has been criticised by some authors; such procedures, in their opinion, just try to replicate hypothesis-testing research methods and do not consider the richness of data emerging from any single case study. Aware of this potential bias, the research team explicitly employed also some of the information 'lost' in the operationalisation process in the phase of interpretation of empirical evidence.

Case selection
Ten cases, regarding administrations based in Friuli Venezia Giulia have been selected trough a purposeful sampling approach. Cases have been selected on the basis of data richness and relevance, including both successful and unsatisfactory experiences.

Two cases have been chosen for a pilot phase, to test the appropriateness and the relevance of the analytical model, as well as to fine tune the structure of the interviews.

Out of the two pilot cases, so far it has been possible to complete only one. Therefore the completed pilot case study provides the empirical evidences for the preliminary findings.

Data collection techniques
For each case study, we initially collected the documents immediately available to the general public (reports, press releases, newspapers articles). Subsequently local administrations granted permission for accessing the official documents. Afterwards semi-structured interviews with key informants have been planned and conducted. We decided to adopt...
two different sets of questions (as guidelines reflecting the categories of the theoretical model): on one side those directed to the politicians, administrators and/or those involved in the design and management of the process; on the other side, those formulated to the participants. Finally we planned a series of observations from the field by participating to some of the inclusive processes. Different data collection techniques allow triangulation of the evidence and strengthen the relevance of the findings as well as reduce the risk of errors in the original records (Bailey, 1984).

**QUALITATIVE MODEL FOR ANALYSIS**

The qualitative model assumes that it is possible to assess how the organizational arrangements of the interactive process (i.e. the way the process is ex-ante designed) influence its results, given the influence of a range of contextual factors. The starting point is the structure designed by Edelenbos and Klijn (2005), adapted to the local milieu.

In order to do so, three macro-categories have been individuated: organizational arrangements, contextual factors and results (see fig. 1). Each macro-category has been then specified in greater detail.

Organizational arrangements components have been defined by positioning them on a scale that goes from a minimum to a maximum value in nominal terms: 0 designates the minimum, 0,5 the middle one and 1 the maximum.

The contextual factors are more descriptive in nature and only some of them have been graduated on a three values scale: high, medium, low.

Finally the definition of the results of inclusive decision making processes have been by far the most complex: there is always the risk to become whether tautological (the result is the decision itself), whether inconsistent (the result is participation *per se*). We decided to assess the first (preliminary) result through the dichotomy “decision taken: yes or no”. Then, main results have been graduated on a four-values scale: ++, +, -, -- (i.e. very satisfied, satisfied, dissatisfied, very dissatisfied).

A detailed description (fig. 2) of each of the components follows:

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**Fig. 1**

[Diagram showing the qualitative model for analysis with nodes for Organizational Arrangements, Actual Participation, Intermediate Outputs, Results, and Environmental Factors connected in a circular flow diagram.]

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Organizational arrangements

a. **Formalization of the process**: we initially defined the formalization of the process through process design, deadlines and output specification:

I. **Process design.** Edelenbos and Klijn (2005) reflect on organizational arrangements through “the degree of formalization of the interactive process through process design and process management”. We originally took into consideration only the first one. The maximum level of formalization corresponds to those processes that have a pre-defined design (for normative reasons, for custom or choice), and are followed without flexibility and/or adaptation. The medium level of formalization corresponds to a design structured during the implementation of the process (whether suggested by the manager or as contextual need); the minimum level corresponds to the absence of a fixed process design.

II. **Deadlines.** The presence of clear deadlines to be met, related to some or all the phases of the process, is one of the more self-evident indicators of formalization. The maximum of formalization corresponds here to top re-determined deadlines (by rule or choice); a medium of formalization corresponds to flexible deadlines (and are suggested by the manager or appear as a contextual need); the minimum of formalization is where no deadlines are set.

III. **Output specification.** This sub-category refers to the expected outputs and contributes to define the level of formalization of the process in that establishes ex ante that: a pre-determined output is expected (with specific content and procedures) as a maximum of formalization; a generic output is expected (the process bind the participants to a result, without specifying the content and the procedures) as a medium level of formalization; there is no output expected other than the inclusive process in itself as a minimum of formalization.

b. **Accessibility of the process**: accessibility is meant here as the openness to the authentic stakeholders’ participation (King, Feltey and Susel, 1998; Lowndes, Pratchett & Stoker, 2006). The relevant sub-categories are communication, stakeholders’ selection and openness of the process.

I. **Communication.** Transparency of an administrative process is strictly related to its accessibility and contributes to create trust (Irvin & Stansbury, 2004). Here we consider the contribution of communication that the local administration have put in place throughout the inclusive decision making process. The maximum of accessibility corresponds to a dialogic approach, bidirectional and targeted communication, that goes along the whole process. A medium level of accessibility corresponds to a communication approach which is mono-directional, generic and limited to the main events of the process. Finally the minimum of accessibility corresponds to a communication limited to the compulsory information, and that uses standard tools without any reference to the targeted public.

II. **Stakeholders’ selection.** The gate-keeping role in respect to the process is by far one of the most significant dimensions of accessibility. Different authors have indicated the selection of participants as one of the main organizational arrangements that influence the results of inclusive decision making processes (i.a. OECD, 2001; Valotti 2005; Bobbio, 2005; Edelenbos and Klijn, 2005; Regonini 2005). In this category we include as well the “width” of participation indicated by Klijn and Edelenbos (2005).

The maximum value here is represented by the absence of selection (everybody can freely participate); the medium value corresponds to a selection made on representational basis or on self-candidature; the minimum to a selection made by choice (in this case we will highlight the criteria used and, specifically, if representativeness and/or internal democracy are requested to organizations that are to be selected for participation, see Halphin, 2006).

III. **Openness of the process.** The effective role of participants within inclusive decision making processes has been the depicted through many typologies (i.a. Arnstein 1969, OECD 2001, Edelenbos and Klijn, 2005, Pillittu, 2009). Here we maintain the basic model that differentiates among co-decision (maximum of openness), consultation (medium value) and information (minimum value of openness) and we include as well the “depth” of participation indicated by Klijn and Edelenbos (2005).

c. **Internalization of the process:** The specificity and importance of this category lies in its capacity of making apparent the level of commitment towards inclusive decision making of the public administration concerned. That is to say that public administrations believe in this approach to the point of actively participating, making new rules and changing organizational roles. (Valotti 2005; Edelenbos & Klijn, 2005; Edelenbos, 2005)

Relevant sub-categories are:

I. **Political.** This sub-category recuperates the “roles of politicians” (Edelenbos & Klijn, 2005) in that describes the role that the political administrators take within the inclusive decision making process. The maximum value here corresponds to the politicians that take a formal role and a consequent behavior. The medium level is defined as a substantial participation of the politicians that take on de facto public visibility and accountability. The minimum level corresponds to a compulsory participation without any direct visibility and/or accountability towards the process.

II. **Institutional.** The main considerations that brought us to include this sub-categories is the peculiar Italian situation where recently some regional Councils approved laws regulating citizens’ inclusion and there is a natural tendency towards increasing institutionalization. The maximum of institutional internalization corresponds to the creation of law or similar norms that compel public administrations towards a strategic approach to inclusive decision making. The medium level is represented by the existence of regular praxis that find their own acknowledgment in diverse formal acts (such as council reports, conventions, official statements and so on). The minimum level consists of the complete absence of institutionalization of inclusive processes.

III. **Organizational.** This sub-category highlights organizational changes in the structure of public administrations concerned. “Complete” organizational internalization corresponds to the creation of new units and posts dedicated to the inclusive processes, as well as dedicated financial resources included in the annual budget. The medium level corresponds to the involvement of external consultancies but with the...
substantial involvement of internal resources/structures. The minimum level is a form of internalization ad hoc, without any consistent involvement of resources and structures and the process is completely attributed to external consultancies.

**Environmental factors**

a. **Actual participation.** Looking at how organizational arrangements influence results in inclusive decision making, we cannot possibly ignore the data related to actual stakeholders’ inclusion. In this sense we don’t consider actual participation as a result of inclusive decision making processes, but as a pre-condition for success. Two dimensions of this factor seem to be more relevant to appropriate describe the phenomenon at hand: how many people participate and how their participation was. (Valotti 2005; Edelenbos & Klijn, 2005, Koppenjan, 2008).

I. **Actual average participation.** Instead of making reference to the total population of the local administrations concerned, we deemed more informative to look at the average attendance at meetings in relation to the initial number of stakeholders selected.

II. **Innovation potential.** Together with numbers of people that attended meetings and initiatives, we tried to assess the “quality” of participation by looking at the contribution of participants in terms of ideas generation, advice and initiatives.

b. **Contextual factors.** Besides actual participation, there is a series of other factors that could influence the relation between organizational arrangements and results and precisely:

III. **Socio-economic environment** Different environments in terms of demography, culture, economic and social fabric have a natural influence on the degree of participation in public arenas. Besides,

IV. **Political composition of local governments.** In Italy inclusive decision making is often associated with centre-left political parties. As an example, all the Regional Governments that passed participation-related laws (see note 1) belong to the centre-left area.

V. **Current political-administrative circumstances.** With this factor we simply mean any kind of ongoing events in the political/administrative arena that could reasonably influence the results of the inclusive process.

VI. **Political salience** (Pollitt, 2006). The concept of salience can be referred to an organisation within the public sector (Hood and Dunsire 1981) or to a policy area (Pollitt, 2006; 2004). In the latter meaning, an issue or a policy area is salient if it is of relevance for public opinion and interest groups and is often in the eye of the media.

VII. **Intelligibility** (Pollitt 2006.) Not all the issues are easily understandable to general public; some of them require specialised knowledge. We assume that this is a relevant feature when an issue is debated through an interactive process.

VIII. **“Budget weight”** (Pollitt 2006). Budget size can be considered a component of political salience. It can be reasonably assumed, in fact, that big issues (in budget weight’s terms) are under strict scrutiny by governments and citizens because their course of action can massively affect the overall public budget and impact social problems.

IX. **Antecedents with some of the stakeholders.** Policy-making is not only affected by formal rules, and structures, but also by value-bearing factors. It is reasonable to argue that some actor, who already interacted in the past can develop routines or mutual trust; that potentially matters for future interactions.

c. **Intermediate outputs.** It has been already mentioned that we don’t consider actual participation as a result of the process (or, in some cases as a proxy indicator of other results). Similarly, we consider that a series of direct outputs of the inclusive decision making process (i.e. final reports, public events, etc.) have to be regarded as possible factors of process enhancement.

**Results**

We made the initial assumption that a minimum result for an inclusive decision making process would be a shared decision. Main results are then defined as the level of stakeholders’ satisfaction towards the decision taken and towards the process itself, the increase/decrease of trust towards the local administration involved and finally the increase/decrease of consistency between decisions taken and expressed stakeholders’ needs.

a. **Shared decision.** Consistently with a managerial approach that considers the value of interactions in the light of more result oriented approaches the first outcome to consider is the adoption of a shared decision.

b. **Stakeholders’ satisfaction** There is a clear connection between actor’s satisfaction and their perception of a positive result of the process (Edelenbos & Klijn, 2005). We take into account the most common criticism to this evaluative criterion effectiveness. Namely Coglianese (2006) suggestion of an alternative focus (effectiveness, efficiency and equity of the decision) is here retrieved through the dimensions of trust highlighted in the interviews. More specifically we will consider actors’ contentment as regards to decision, i.e. to what extent stakeholders accept and support a policy decision. This factor therefore can be considered a political achievement. Secondly we will take into account satisfaction regarding the process, i.e. the quality of interaction in itself, at least as perceived by stakeholders. Trust is a complicated concept, which has several underlying dimensions.

c. **Differential of trust towards the public administration.** Many authors claim that, regardless to any other results any form of inclusion might lead to greater trust of government on the part of the public. Since participation implies ownership of public policy. (Tschanne-Moran, M. & Hoy, W.K. 2000; Callanan 2005; Wang & Wan Wart 2007). Trust has been operationalised according to Grunig 2002, insulating the dimension of integrity, dependability and competence.

d. **Differential between decision and stakeholders’ needs.** Stakeholders’ inclusion furthermore should allow governments to include citizens’ needs in decision making process, therefore increasing legitimacy.
Fig. 2

**ORGANIZATIONAL ARRANGEMENTS**

1. **Formalization***
   1.1. **Process design**
   1.2. **Deadlines**
   1.3. **Output specification**

2. **Accessibility***
   2.1. **Communication**
   2.2. **Stakeholders’ selection**
   2.3. **Process openness**

3. **Internalization***
   3.1. **Political**
   3.2. **Institutional**
   3.3. **Organizational**

*of the process

**CONTEXTUAL FACTORS**

1. **Actual Participation**
   1.1. **Actual average participation**
   1.2. **Innovative potential**

2. **Environmental Factors**
   2.1. **Socio-economic context**
   2.2. **Political composition of local governments**
   2.3. **Current political/administrative circumstances**
   2.4. **Political salience**
   2.5. **Intelligibility**
   2.6. **“Budget weight”**
   2.7. **Antecedents with some of the stakeholders**

3. **Intermediate Outputs**
   (Final reports, public events, etc.)

**RESULTS**

1. **Shared decision**
2. **Stakeholders’ satisfaction**
   2.1. With the process
   2.2. With the decision
3. **Differential of trust towards the public administration**
4. **Differential between decision and stakeholders’ needs**
CASE STUDIES

Through the lenses of the analytical model, two pilot cases have been observed. The first case refers to the construction of an electric main in the province of Gorizia while the second deals with the use of a quarry in the vicinity of Sagrado municipality as a waste collection site. Both processes took place in the framework of local Agenda 21 in the period 2005-2009.

The two cases are summarised in the following tables:

### Pilot cases

<table>
<thead>
<tr>
<th>Pilot cases</th>
<th>Agenda 21 Province of Gorizia “Electric main”</th>
<th>Agenda 21 Sagrado municipality (GO)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Organizational Arrangements</strong></td>
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<td></td>
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<tr>
<td>Process design</td>
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<td>1</td>
</tr>
<tr>
<td>Deadlines</td>
<td>1</td>
<td>1</td>
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<tr>
<td>Objective specificity</td>
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<td>0,5</td>
</tr>
<tr>
<td>Communication</td>
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<td>0,5</td>
</tr>
<tr>
<td>Stakeholders’ selection</td>
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<td>0,5</td>
</tr>
<tr>
<td>Openness</td>
<td>0,5</td>
<td>0,5</td>
</tr>
<tr>
<td><strong>Accessibility</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Political</td>
<td>1</td>
<td>0,5</td>
</tr>
<tr>
<td>Institutional</td>
<td>0,5</td>
<td>0,5</td>
</tr>
<tr>
<td>Organizational</td>
<td>0,5</td>
<td>0,5</td>
</tr>
<tr>
<td><strong>Formalization</strong></td>
<td></td>
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<tr>
<td><strong>Internalization</strong></td>
<td></td>
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<tr>
<td><strong>Environmental Factors</strong></td>
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<td></td>
</tr>
<tr>
<td>Actual average participation</td>
<td>45% 60 participants</td>
<td>40% 50 participants</td>
</tr>
<tr>
<td>Idea enrichment</td>
<td>High</td>
<td>Medium</td>
</tr>
<tr>
<td>Final reports, public events, etc.</td>
<td>Reports, Advices, websites, public meetings</td>
<td>Report on the state of the environment; Agenda 21 information brochure for local schools; Agenda 21 reports; public meetings; website</td>
</tr>
<tr>
<td>Actual average participation</td>
<td></td>
<td></td>
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<tr>
<td>Idea enrichment</td>
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<tr>
<td>Final reports, public events, etc.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Contextual factors</td>
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<td></td>
</tr>
<tr>
<td>Political composition of local governments</td>
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<td>Centre-left</td>
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<tr>
<td>Current political/administrative circumstances</td>
<td>Nothing relevant</td>
<td>Temporary receivership of local administration</td>
</tr>
<tr>
<td>Political salience</td>
<td>High</td>
<td>High</td>
</tr>
<tr>
<td>Intelligibility</td>
<td>Low</td>
<td>Low</td>
</tr>
<tr>
<td>“Budget weight”</td>
<td>High</td>
<td>High</td>
</tr>
<tr>
<td>Antecedents with some of the stakeholders</td>
<td>No</td>
<td>No</td>
</tr>
</tbody>
</table>
CONCLUSIONS AND FURTHER RESEARCH

Some preliminary conclusions can be drawn after the pilot cases’ analysis. First of all, the validity of the model is mainly confirmed. Empirical evidence has been easily organized through the conceptual lenses of the model; informants have confirmed that most relevant topics are covered. It can be argued the model has to be enriched with regards to the “design in action” component. Consequently, some features of “process management” will be added to the model, focusing the way the process is enacted by local governments in the framework of the ex ante designed organizational arrangements. Secondly, further elaboration on the scale that measures outcomes (contentment and trust) is needed, in order to more carefully attribute cases a score. As to the findings, it is hard to propose any sharp reflections on the basis of little empirical evidence, since no emerging pattern can be observed and analyzed. As a preliminary conclusion can be argued that stakeholders involved in the process highly valued process accessibility, while politicians seems to focus on the internalization as a key component.

<table>
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<td>Agenda 21 Sagrado Municipality (GO)</td>
</tr>
<tr>
<td><strong>RESULTS</strong></td>
<td></td>
</tr>
<tr>
<td>Shared decision</td>
<td>YES</td>
</tr>
<tr>
<td>Stakeholders’ satisfaction (with the decision)</td>
<td>NOT REGISTERED</td>
</tr>
<tr>
<td>Stakeholders’ satisfaction (with the process)</td>
<td>NOT REGISTERED</td>
</tr>
<tr>
<td>Differential of trust towards public administration</td>
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</tr>
<tr>
<td>Differential between decision and stakeholders’ needs</td>
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REFERENCES


INTRODUCTION

The role of public relations is becoming more and more significant in international politics. The same process may be observed in the context of the European Union and its communication policy. One of the most intriguing questions is why such term as ‘public relations’ does not occur either in official statements or documents in the work of European Union institutions. Are there any concerns regarding possible public perception of the notion of PR?

The Communication Policy seems to be increasingly important for the EU institutions which is proofed by the number of specialists dedicated to work in communication areas. In the former European Commission there was Margot Wallstrom, Vice-President, responsible for social communication. There was also a Commissioner for Information Society and Media – Viviane Reding. Both led two separate directorates-general with many employees engaged in communication and public relations activities. Currently, Reding holds the post of Vice-President of EC, being the Head of DG Communication. Moreover, there is an extensive apparatus of press officers and spokesmen in the European Parliament, the European Council and other European institutions.

The main issue of this paper is the lack of expected results of the current formula of the EU Communication Policy and the complex reasons for this situation. Numerous opinion polls prove that the EU Communication Policy is ineffective. (EUobserver, Eurobarometer 2006). Respondents confirm their unawareness of EU’s structure and activities, as well as their dissatisfaction with the communication with EU institutions. Another evidence about the failure of EU’s PR may be observed in the negative attitude of EU’s societies towards widening functions and further enlargement of the Union - just to mention recent political tensions which started from France and Netherlands referenda on Constitutional Treaty in 2005, continued in Irish referendum on Lisbon Treaty in 2008 and later debate over implementation procedures.

The key issues of the paper are:

- problems with emerging European public sphere and European identity in relation to communication policy,
- doubts concerning compatibility of the concept of PR with the EU communication practice,
- possible measures for improving the effectiveness of the European communication policy.

First, the paper discusses democracy-related notions and discourse ambiguities, especially with such terms like “European public sphere”, “European identity” and “democratic deficit”.
Secondly, it demonstrates that PR and communication policy concern the same activities and therefore PR may be regarded as appropriate term in the EU institutional context. Thirdly, it uncovers connections between crisis management politics and EU communication solutions within analysis of the evolution of communication policy, as well as its current form and strategy.

The article links European integration, politics and communication in order to examine contemporary issues of public relations on the international level. A study on EU communication resembles a laboratory for one of the most challenging and intriguing topics of our time. The theoretical basis brings an additional value, showing the crucial meaning of the communication process and mechanisms.

CONTEMPORARY CHALLENGES FOR COMMUNICATION

There are certain difficulties regarding the whole democracy-centered discourse which presently takes place in Europe. The meaning of “nation”, “nationality”, “state” or “identity” has recently been challenged. The concept of democracy is not really adequate when we consider institutional framework of the Union and its national diversity. The untypical structure of this quasi-organization cannot ensure that the democratic scheme will work here. Thus, this conceptual problem perhaps should not be considered as an obstacle in communication. ‘Democratic deficit’ arises as an unfair accusation towards the EU because the notion of democracy is rather irrelevant to EU mechanisms. (Nzimkiw, 2006, 46).

In postmodernist approach Zygmunt Bauman, sociologist writes about “Liquid Modernity”, where many terms are not stable enough and begin to be “liquid”. He expresses the changes that we might observe in Europe at the moment – new types of identity, vanishing borders between states. (Bauman 2000, 9). Similar conclusion could be outlined from “Europe as Empire” by Jan Zielonka who analyses etos and demos in contemporary Europe. He states that the EU cannot be regarded as a democratic state since there is no European society sharing unified values and beliefs. (Zielonka 2006).

This conjunction has further implications on communication within the EU, as it refers to the European identity and European public sphere. Observers and researchers draw attention to emerging pluralistic identities regarding a number of factors: culture, economic interest, politics and shared experiences. (Mayer, Palmowski 2007, 85-123). At the same time they claim that there are several types of identities, which have already gained European character: legal, historic, cultural, constitutional or institutional.

Pluralistic identities hamper European communication since they require a multilevel, complex approach designed for different groups of society. More issues have been found in the analysis of the European public sphere which is considered as one of conditions of the communication process. Again, the public sphere as a democratic feature does not seem to be compatible with EU matters. However, Jürgen Habermas believes that European public spheres have appeared in relation to common threats and problems. He writes that if societies notice supranational interests and the need for solidarity, the political community might be established. (Habermas 2001; Habermas, Derrida 2003).

The specificity of the emerging European public sphere resembles a structure of network or a number of quasi-spheres focused on particular concerns. (Eriksen 2005). One might point out a couple of problems/threats that affect all European countries: global warming, terrorism, immigration, renewable energy, economic crisis etc. Also, there are every-day interests shared by the Europeans e.g. roaming costs, VAT, mobility rights, the safety of cosmetics products etc. Thus, potential topics are various and they require international cooperation under the aegis of the EU. This is why there are numerous European groups, associations and organizations which collaborate together in different states and regions.

COMMUNICATION POLICY VS. PUBLIC RELATIONS

Linking two definitions of “public relations” and “communication policy” might provide satisfactory answer for one of the general questions posted in the introduction. Once the link is established, it should be possible to measure how many PR instruments are being used by the EU institutions and whether the notion of PR is appropriate in the area of European integration.

There are noticeable similarities if we compare the meaning of “public relations” and “communication policy”. One of well-known definitions states that public relations is the management function that establishes and maintains mutually beneficial relationships between an organization and the publics on whom its success or failure depends. (Cutlip et al 1994, 6). Thus, the aims of PR and communication policy are substantially the same e.g. maintaining profitable relationships with the public or building a positive image of an organization.

The study of activities of the EU institutions demonstrates that there are indeed several PR features e.g. community relations, internal relations, agenda-setting (issues management), lobbying or crisis management. Also, spokesmen and press-officers work should be added, as well as a number of organized press-conferences, study tours and anniversary events. Nevertheless, information projects seem to dominate EU communication activity: www.europa.eu, Europe Direct, Europe by Satellite, Your Europe, Debate Europe, Rapid or Team Europe.

This practical approach is not the only proof of the appropriateness of PR terminology in the context of the EU institutions. The other one is the soaring existence of PR in global politics, especially within the most integrated areas. It is supported by significance of such concepts as international PR, public diplomacy or national branding. (Michalczuk 2005, 251). Though the sense of international PR is predominantly associated with economics, the same rules might be applied to politics. Governments have been using PR tools in the international politics for decades – in the case of diplomacy, cultural policy or communicating with foreign public.

“Branding Europe” could be considered as another feature of EU public relations when we take the European symbols into account. European citizenship, anthem, flag, Euro coins...
and banknotes are playing an important role in the process of EU branding. (Aveline 2006, 334-340). The blue logo with stars commonly appears on documents, advertisements, number plates, road signs and in front of many national or international institutions.

THE EFFECTIVENESS OF THE EU COMMUNICATION POLICY

The whole idea of this policy and its evolution reflect a style of crisis management since the improvements of communication were, in fact, merely responses to the acts of social disapproval reflected in a number of referenda. If we follow a relatively short history of the EU Communication Policy we might observe a kind of pattern which originated in the 1990’s. The first example was the Openness and Transparency concept which arose as a reaction to Danish “No” voting on the Maastricht Treaty in 1992. (European Council in Edinburgh, Dec 1992, Presidency Conclusions).

The next step was the Santer’s Commission crisis in 1999, preceding dismissal as a result of fraud scandal. The new Commission headed by Romano Prodi started work from broadening the Openness and Transparency programme. Then, there was the Treaty of Nice (2001) which was not approved by the majority of the Irish voters. In response, another legal improvement did occur – Council Conclusions on Openness, Transparency and Good Administrative Behaviour and Declaration about Public Access to Documents. (European Council Press Release 25.06.2001).

The Information and Communication Strategy for the EU was announced in 2002 and can be regarded as an achievement of the European Commission. Its goals were: 1) minimizing information deficit and focusing on social expectations (environmental protection, globalization, closing the economic divide); 2) building a coherent and comprehensive communication policy; 3) addressing information and messages to the specific interests and concerns of different target groups. (Communication from the Commission to the Council, the European Parliament, the Economic and Social Committee, the Committee of the Regions on an information and communication strategy for the European Union, COM(2002) 350 final, Brussels 2002). This strategy states that “the public is aware that it of the Regions on an information and communication strategy for the European Union, COM(2002) 350 final, Brussels 2002). This strategy states that “the public is aware that it is poorly informed on Europe. It is only too ready to blame not only the media and national authorities, but also the European institutions, for the perceived ignorance or prejudice. Fighting ignorance and apathy is now a must for the European Union. Remember that turnout in the European elections fell from 63% in 1979 to 49% in 1999.”

Nevertheless, the strategy did not prevent the EU from negative result of voting on the Constitution in France and the Netherlands in 2005. After that a “reflection period” was established and “Plan D for dialogue, debate and democracy” announced in order to begin a debate over the future of the EU, especially at the national level. The outcome of the number of meetings and accompanying Eurobarometer research was very useful for the European institutions to identify key problems. Major citizen concerns were the economic impact of globalization and the collapse of the social care system. On the one hand the discussion showed high expectations about the EU, and on the other it highlighted the lack of awareness of the EU institutional structure and activities. (The period of reflection and Plan D – COM (2006) 212; Plan D – Wider and deeper debate on Europe, SEC (2006) 1553).

There are many documents regarding communication policy, which have been published by European institutions. Only some of the most important ones are mentioned in this article. The analysis of these papers confirms the lack of anticipated results of this policy. In order to avoid hampering the integration process, the EU must rethink the framework of the discourse. Furthermore, most of the priorities of the strategy should be strengthened and continued (e.g. a coherent source of information, multilevel approach and responding to common concerns). Finally, PR and media tools shall be used in a wider and more effective way; in particular, the introduction of an EU TV channel broadcasting in national languages and accessible for majority of the European audience. (Niżnik 2006, 46).

CONCLUSIONS

As stated earlier, there are several problems regarding the flow of information between European institutions and citizens, which uncover a substantial gap in communication. This conclusion is followed by the negative feedback from citizens through various opinion polls held by Eurobarometer, as well as researches commented in the European Voice or EUobserver. A number of “No” referenda on new treaties, which were evidently of high importance for the EU, also convey the same findings.

The current formula of the EU Communication Policy is not suitably supporting European integration. The policy today can be criticized for its incoherence, indirectness and passivity. Although the communication policy has some achievements, its evolution seems to confirm that the improvements occurred as an outcome of a crisis management approach.

Neither European identity nor the European public sphere has occurred so far. As a result, national and local politics interfere with the flow of information between EU institutions and citizens. EU agenda is often subject to politicians who act according to their own personal, local or national interests. In general, the citizens’ perspective does not reach beyond regional concerns, and European referenda outcomes reflect predominantly national worries and expectations. Moreover, the well-known accusation entitled “democratic deficit” is controversial because the concept of democracy does not seem to be relevant to the EU matters and specificity. Despite the lack of the European public sphere, communication is nevertheless possible because the EU has not got an entirely democratic structure. Some authors admit that there are already networks and quasi-spheres focused on particular concerns.

One of possible solutions for making this policy more effective is to establish a new theo-
retical background avoiding constant references to democratic concepts and traditional attributes of the state. EU substance tends to be more complex. Thus, the key ideas of a communication strategy announced by the European Commission should be consistently implemented: **focusing on people’s expectations, targeting groups, and coherence of information.** Finally, in response to the main obstacles of communication, European media should be established, particularly television channels that broadcast in several national languages.

**Public relations might be regarded as an appropriate perspective to grasp EU communication needs** and can be used within this context. It is a term closely related to “communication policy” because both assume creating positive image of an organization and maintaining mutually beneficial relations with the public. There are many examples of PR instruments in the work of the European institutions. In addition, international politics have been using PR for centuries, especially in such areas like diplomacy (public diplomacy), cultural policy or - nowadays - national branding. Therefore, PR terminology can successfully be applied to the EU institutions work.

The findings of this article support the need to introduce significant changes within the EU communication framework, as it currently does not adequately stimulate European integration. Cautiousness about the official use of the term ‘PR’ is difficult to understand. Thus, one of the recommendations is to **strengthen PR instruments** in the EU communication and personalize the policy. A further conclusion refers to the ambiguities concerning incoherent and indirect dialogue with the public. A centralised bureau with a cohesive source of information regarding all activities of the European institutions should be introduced (DG Communication is not an example of an information centre for all EU institutions), but local and regional departments with professional communication staff are also desirable.

**REFERENCES**


2. Balzan, Aleander. *EU communicates poorly with the citizens*, EUobserver, 2006;


17. Standard Eurobaromter 65: Spring 2006,

Communicating the EU to The Media: The Delicate Role of Press Officers at The Council of The European Union

by Bo Laursen and Chiara Valentini

INTRODUCTION

Most studies in public relations focus on communication within business organizations. Communication in the public sector has largely been ignored, even though it poses unique problems (Gelders & Ihlen, 2010; Graber, 2003; Lee, 2001a, 1999; Heise, 1985). Only few case studies on public sector communication exist (Avery et al., 1996) and in most cases these studies have applied models developed for analysis of private sector communication (Liu & Horsley, 2007; Fairbanks et al., 2007). Within the European context, only a limited number of studies have dealt with EU institutions and their communication management from a public relations perspective (Valentini, 2008, 2007) and even less have focused on the activities and communication practices of government public relations officers.

This paper deals with the media relations activities performed in the Council of the European Union and more specifically explores the communication tasks and practices of press officers in the Press Service of that institution. We begin by reviewing the literature on public sector communication and government public relations in relation to the European Union. In the second section we state our research objectives and present our methodology. The third section focuses on the Council press officers’ institutional environment and provides a brief presentation of the structure and functions of the Council of the European Union and its General Secretariat. The fourth section contains our findings and in the fifth section we conclude by highlighting some of the differences between the media relations activities performed by Council press officers and similar activities performed in the corporate sphere and in the European Commission.
LITERATURE

When it comes to studies on the communication of public sector organizations, literature on government public relations is limited (Windsor, 2001; Dennis, 1996; Fleisher, 1993, 1995, 1997). Within the area of government public relations the bulk of existing research seems to deal with public information campaigns and political campaigns and their effects on public awareness and behaviours. Studies on these two types of communication are numerous and extensively cover different sub-disciplines as well as theoretical and methodological approaches. However, we still need a clear understanding of the role of the government public relations officers who are behind campaigns and/or political communication. As Garnett and Kouzmin (1997) pointed out communication in public sector organizations often seems to be forgotten by communication scholars despite the increasing relevance of communication for major activities in the public sector. Government public relations officers play an important role because they contribute to public understanding of government policies and raise awareness of the roles of decision makers and purview of public institutions, availability of social services, noteworthy trends, and risks to public health and safety (Édes, 2000).

Studies investigating communication practices in the public sector are mostly country-based or contextualised to a specific service, e.g. health care, transportation, etc., provided by the public agency (cf. Lee, 2009). Within public relations scholarship only a few studies have dealt with public sector communication (i.e. Lee 2009, 2007, 2001a; Grunig and Jaatinen, 1999; Baker, 1997; Adams, 1995), although practices, strategies and tactics of public relations are commonly used by government public relations officers. Baker (1997) further comments on this lack of studies in his work on US government public relations where he uses this term to refer to communication practices performed by public sector agencies with the aim of influencing elected decision-makers, providing information services, developing and protecting positive institutional images, and generating public feedback (Ibid, 1997: 456-457).

Grunig and Jaatinen (1999) pointed out that the traditional models of public relations are valid for the public sector and acknowledge that, even if the public information model seems to be the most employed among public administrations in several countries, it is possible that other models, such as the two-way symmetrical model, are used in other parts of the world by the public sector. An example of two-way symmetrical communications in the public sector are the European Commission’s recent communication activities, which, at least at normative level, seek to promote dialogue with different EU stakeholders by engaging civil society organizations and other parties in discussing EU policies and initiatives (Valentini, 2010).

Gelders and others (2007) further explain that civil servants working in communication have four additional constraints commonly found the public sector compared to the private sector: more complicated and unstable environment, additional legal and formal restrictions, more rigid procedures, and more diverse products and objectives. Allison (2004) and Beckett (2000) also concur that as public sector management differs in many respects from corporate management, communication practices in the two spheres are far from being identical.

Along with this view, Liu and Horsley (2007) developed a new model of public relations for the public sector called the government communication decision wheel. According to these authors, the wheel provides a useful tool to help government communicators select the most effective means of communication based on the situation, the environment, and the resources available. It also provides an initial framework for reconceptualising how public relations is practiced in government. The wheel, however, has not yet been tested. Typically, government public relations officers deal with: monitoring media coverage, briefing and advising political officials, managing media relations, informing the public directly, sharing information across the administration and formulating communication strategies and campaigns, and researching and assessing public opinion (Lee, 2007, 2009). Some of these activities are one-way communications, but today government public relations officers are called for a more dialogical approach in communicating with their constituencies (Valentini, 2007, 2010). Because public sector organizations need to keep their publics informed and openly report on their activities, public reporting is one of the government public relations activities that is widely implemented (Fitzpatrick, 1947). Public reporting can be performed indirectly, through news media coverage of agency activity, and directly, through products such as annual reports, websites, TV programmes and newsletters (Lee, 2001b). Public reporting, external communication and publicity contribute to the democratic accountability (Viteriti, 1997) by informing and enabling citizens to make political decisions, by mobilising citizens towards an issue and/or simply allowing citizens to evaluate the work of their representatives.

Especially for supranational organizations like the European Union government public relations are crucial for providing information to the general public and for getting policy support through the media. For government public relations the media are the most important link between politics and citizens (e.g. Entman and Bennett 2001; Swanson and Mancini 1996), and this may especially apply to an issue as remote and abstract as EU politics (Blumler, 1983). The fact that Eurobarometer surveys consistently show that the majority of EU citizens identify the media as their most important source of political information further supports the argument that government public relations, especially media relations, is very important for the EU.

Despite the relevance of the topic, very few scholars have analysed the tasks and communication practices of EU press officers (i.e. government public relations officers). Anderson (2004) studied the extent to which the European Parliament’s Press and Information Directorate, DG-III, and to a lesser extent, Members of the European Parliament, are successful in handling their relationships with the mass media, given that the latter is a crucial means of communicating images of the Parliament to the electorate. Meyer (1999) analysed and evaluated the European Commission’s media communication activities and placed them in the context of the EU’s broader institutional set-up and decision-making procedures. His findings suggested that most of the European Commission’s media
communication problems were related both to the lack of competent staff and to a system of governance that depoliticised conflicts and obscured political accountability. Spanier (2010) investigated the news management activities and practices of the spokespersons of the European Commission and found that the Commission’s media relations activities were exclusively oriented toward a transnational expert sphere consisting of Brussels-based stakeholders directly involved in EU policy-making and toward the specialist press (in particular the Financial Times), while leaving apart broader audiences. With respect to the Council of the European Union and its communication activities little is known apart from Beyers and Dierickx’s (1998) investigation of the Council working groups. These scholars found that the functioning of these groups contributes to a supranational and intergovernmental communication network. The Council of the European Union appears to be the least studied organization among the EU institutions. This paper aims at filling this gap by investigating the activities of press officers working at the Council of the European Union and providing an overview of their communication tasks and practices as perceived by the press officers themselves.

**RESEARCH OBJECTIVES AND METHODOLOGY**

This study is a first step in a more comprehensive research project aimed at a detailed understanding of the work practices, roles and environment of press officers in the Council Secretariat. In this paper we intend to explore the press officers’ main communication tasks when they communicate with the media as well as the way they perform these tasks.

A qualitative research approach was used to gather in-depth understanding of the press officers’ tasks and communication activities (cf. Lindlof and Taylor, 2002; Denzin and Lincoln, 2005). Qualitative research methods are appropriate for investigations of an exploratory nature, since they provide textual descriptions of how people experience a given research issue (cf. Given, 2008). Additionally, qualitative research methods have proven to provide significant contributions when the research intentions are to better understand a phenomenon about which little is yet known (Strauss and Corbin, 1990).

Semi-structured face-to-face interviews with seven out of ten press officers of the Council Press Service were conducted. All interviews were recorded and transcribed. Interview length varied from forty-five minutes to one hour and fifteen minutes. Each interview consisted of a few introductory questions on interviewee’s past professional experience and educational background, followed by more specific questions on his/her current position, tasks and functions as well as on his/her communication practices in the Council Press Service. In order to increase the interviewees’ openness confidentiality was assured (cf. Given, 2008). In addition, we analysed other internal documents, such as the General Secretariat Mission Statement, Council Secretariat’s Regulation and Code of Good Administrative Behaviour and the Media Guide of the Council Secretariat. The final goal of this study is to provide a descriptive, theoretical understanding of the tasks and communication practices of the press officers working at the Press Service of the Council of the European Union.

**THE COUNCIL OF THE EUROPEAN UNION**

The Council of the European Union is the EU’s main decision-making body. It is composed of one minister from the government of each EU member state. The ministers attending Council meetings vary according to the issues under consideration. Therefore the deliberations in the Council take place in different Council configurations depending on the subjects discussed. The Council’s main function is to adopt EU legislation. In a large number of policy areas (‘Community’ fields such as the Internal Market) the Council shares legislative power with the European Parliament and acts on proposals drafted by the European Commission but in some important areas (such as defence and external relations) the Council has sole right of legislative initiative.

In the Council the 27 member states seek compromises through negotiation. Due to opposing national and ideological interests, cultural differences and sitting governments’ conflicting political agendas this often entails lengthy and cumbersome discussions both at the preparatory stages – meetings of national experts (working parties) and ambassadors (Coreper) – and at ministerial level. Due to the fact that the Council is the forum where member states often fight their battles in order to maximize national influence, the Council “distils the bottom line in terms of the collective of national interests” (Curtin 2007, 249). Exactly this feature gives the Council its particular institutional flavour. Negotiations among member states’ delegations are orchestrated and chaired by the Presidency which is held by each member state, on a rotating basis, for a period of six months. The Presidency seeks to build consensus by mediating primarily between member states, but also between the Council and the Commission and the Council and the European Parliament (Nugent, 2006: 205). Furthermore the Presidency sets the pace and to some extent the political priorities in the legislative and political decision-making process. It does so particularly by convening meetings, establishing agendas and drafting compromise proposals. The Presidency is assisted in its work by the Council Secretariat.

**The General Secretariat of the Council**

The press activities of the Council Press Service are embedded in the General Secretariat of the Council and the particular professional situation and behaviour of the Council press officers can only be fully understood in the light of the missions, tasks and culture of this institution. The Council Secretariat provides the practical as well as the ‘intellectual’ and strategic infrastructure necessary for the smooth operation of the Council decision-making machinery. The practical tasks performed by the Secretariat include organizing meetings, providing conference rooms, interpreting services and security staff, establishing agendas, translating, reproducing and distributing documents and drafting minutes. These basic administrative tasks have existed since the Secretariat’s early years in the 1950s. Gradually new and more ‘intellectual’ and strategic tasks and roles have been added. These include functioning as the Council’s institutional memory and as a bridge between the short rotating Presidencies that fosters coherence and continuity in the Council’s work; assisting the Presidency with the formulation of compromise proposals; providing legal and procedural advice to the Presidency; advising the Presidency on negotiation tactics on the basis of
the secretariat’s extensive knowledge of member states’ positions on various issues. In certain policy areas (justice and home affairs as well as foreign and security policy) the Secretariat has been entrusted with executive tasks (Christiansen, 2006; Christiansen & Vanhoonacker, 2008; Westlake & Galloway, 2004).

The principles that guide the work of the Secretariat as a whole and of each member of its staff are impartiality and devotion to the common European interest. This is in keeping with the fact that the Secretariat, besides being of assistance to the Presidency, is at the service of all member states. Furthermore the Secretariat needs to have an absolutely unblemished reputation of neutrality in order to be able to fulfil its role as a credible and trustworthy assistant to the Presidency in its efforts to build consensus among member states. The ideals of impartiality and devotion to the collective interest are an integral part of the dominant culture in the Secretariat which seems to encourage members of staff to act as humble and discrete service providers. The official role of the Secretariat and its staff has been qualified as ‘backroom’ (Westlake & Galloway, 2004, 318) and it seems that the less its efforts stand out the better.

As it appears from the following figure the press office is located in DG (Directorate General) F. DG B, C, E, G, H and I (policy DGs) largely concentrate on policy issues dealt with by one or several Council configurations. Each policy DG thus concentrates on one or several policy areas and the main tasks of staff in these DGs are to monitor policy developments and to be of assistance to the Presidency as briefly described above. Thus, e.g. staff in DG B closely follows issues dealt with by the Agriculture and Fisheries Council whereas staff in DG I more or less covers issues discussed in the three Council configurations “Employment, Social Policy, Health and Consumer Affairs”, “Environment” and “Education, Youth and Culture”. The staff in the policy DGs is among the press officers’ closest internal collaboration partners since they are the Council staff with the most detailed and up-to-date knowledge of the issues under way in the Council machinery.
COMMUNICATION TASKS AND PRACTICES IN THE COUNCIL PRESS SERVICE

The Council press officers, who are civil servants like the majority of the staff of the Council Secretariat, are attached to the Press Service which is one of three units of DG F.1 Besides providing the media with written and oral information on Council matters, the activities of the Press Service include managing a press centre, organizing press conferences, monitoring the coverage of Council related issues by selected European media (press clippings), and producing photographic and video based material related to the Council’s activities. In the Press Service currently ten full time press officers provide written and oral information on a daily basis to the media on the activities of the Council and its preparatory bodies. Each press officer specializes in subjects and policy areas covered by one or two specific Council configurations. They are, as one interviewee said, “the main entrance for information on the Council”. The bulk of the press officers’ communication activities concerns Council meetings whereas the activities in the preparatory bodies (working parties and Coreper) in general are of less interest to the media and therefore tend to be communicated only if requested by journalists. The account below of the press officers’ tasks and practices therefore only deals with communication pertaining to Council meetings. The rhythm of the press officers’ work is dictated by meeting activities: before, during, after and between Council meetings.

Before Council meetings: drafting background notes and briefing journalists
Before each Council meeting the press officer responsible for that particular Council configuration drafts a note, officially labelled ‘information note’ but internally known as ‘background note’. This document (available from the Council website before the meeting) accounts for all items on the agenda of the meeting (established by Coreper). The background note is a highly structured document drafted on the basis of information contained in minutes of meetings (held at working party, ambassadorial, and ministerial level), information obtained from colleagues (so-called ‘desk officers’) in other DGs who have in-depth knowledge of the policy areas covered in that particular Council meeting, and information gathered from attending meetings at various levels where the agenda items have been discussed. Since the core activity of the Council is adopting EU legislation most items on the Council agenda are related to legislative proposals and for each such item general information, such as history, background, motivations, aims, and procedural matters is provided. In drafting the background note the press officer seeks to identify the main issues of the Council meeting with the purpose of helping journalists to “know which are the subjects dealt with and where (…) problems can arise” (Interviewee no. 2).

Furthermore the press officer is present at the off-the-record briefing that the Presidency gives before the Council meeting on the basis of the background note. Immediately after the Presidency briefing the press officer is available to the press for further oral information on the agenda items.2

During Council meetings: attending meeting and (possibly) briefing journalists
In general the press officer is present at the Council meeting in order for him or her to be able to draft a press release on the outcomes immediately after the meeting. Press officers may leave the meeting room in order to brief journalists on important developments in the negotiations.

Furthermore and in order for the journalists to cover the Council meeting in real time the Press Service makes available to the press the Council’s conclusions on each agenda item (prepared by the preparatory bodies and adopted – and possibly amended – by the ministers) immediately after they have been adopted as well as in some cases ‘flash releases’ and ‘fact sheets’ that are more targeted documents prepared by the press officer in advance with more detailed information on selected issues and decisions.3

After Council meetings: drafting press release
Immediately after the Council meeting the press officer drafts a press release (available from the Council website) accounting for the outcomes of the meeting. If ministers did not reach agreement on a legislative proposal the press release often contains information as to what will be the follow up to the discussions. To the extent that legislative proposals on the agenda of the Council meeting are adopted much of the information from the background note will also appear in the press release. However, one important difference between the background note and the press release is that whereas the former is written exclusively for journalists and needs not be approved in any way by the member states, the latter is of a more official nature since it is the first official account of the ministers’ discussions and all member states in a certain way have to agree to what the press officer writes. As one interviewee puts it,

“There are certain things that we can’t say in the press release that we would say in the background note (...). What we write there has to be of a nature that won’t upset anybody, whereas if we say something in a background note which is maybe not the same universal view shared by everybody then that’s just too bad, people aren’t going to start ringing us up about what we put in the background, but they would do if we put it in a press release”.

Interviewee no.1

1 The main activities of the two other units of DG F include respectively communication with the general public (mainly through small articles posted on the Council website and paper based publications) and managing the Council’s archives and the general public’s access to Council documents (transparency).


3 Ibidem.
Between Council meetings: keeping updated on dossiers in the pipeline

For the individual press officer the workload tends to peak around meetings of the Council configuration that he/she is responsible for. Between Council meetings press officers keep themselves updated on the dossiers that are underway in the Council machinery, i.e. at working party, Coreper and ministerial levels, and replies to phone calls and emails from journalists who seek information on particular issues.

In order to provide correct and relevant information to the media press officers need to have a thorough knowledge of the issues and dossiers dealt with by “their” Council formation. To be updated the press officers read documents drafted by the Commission (e.g. legislative proposals), the European Parliament (e.g. documents related to legislative proposals in numerous areas where the Council shares legislative competence with the European Parliament) or other Council officials, mainly staff in the relevant policy DGs (reports, minutes of meetings, progress reports) but also experts from the Council’s legal service (notes on legal aspects of legislative proposals under discussion). Consequently they depend on staff in the DGs for updated information on the individual dossiers. The following quote illustrates this dependency:

“So there [in the relevant DG] I know which person is responsible for which dossier. And then if I have questions of understanding, or questions of procedure or questions of history then I try to get in touch with these people to clarify that for myself first of all, in order to be able to answer as much as possible any question that comes from journalists straight away, which is not always possible. So when there are questions I can’t answer I give a hold answer and say please let me get back to you as soon as possible. And then I get in touch with the same desk officer again.” (Interviewee no. 7)

Besides reading documents and liaising with DGs press officers attend a considerable number of meetings at different levels in the Council machinery. Most of them only occasionally attend meetings of national experts (working party level) as discussions at this level tend to be technical and of limited interest to the media, whereas meetings at ambassadorial and ministerial levels must be attended in order to grasp the nuances of the different and often conflicting ideological and national views on each dossier.

Written and oral communication

Press officers provide information in writing (background notes, press releases and flash releases/fact sheets) as well as orally (face-to-face and telephone briefing). They perceive written and oral communication to be very different activities highlighting particularly the difference in degree of flexibility in terms of style and content. The room for maneuver in briefing is much wider than in written communication and several interviewees characterize briefing as being the main communication form.

In terms of style written communication tends to be bureaucratic - “in order to identify the institution and to be precise” (Interviewee no. 2) - , formal and highly structured. As for briefing no particular standards seem to exist, and press officers characterize briefing as being informal and “totally unstructured” (Interviewee no. 1). The main difference between the two modes of communication, however, concerns content. Whereas background notes and press releases must contain information on all agenda items the topics dealt with during briefing sessions mainly depend on which questions journalists raise themselves or what the press officers believe to be of interest to journalists. Council press officers thus do not seek to act as agenda setters, neither in writing nor orally. All interviewees concur that they are in the business of reactive, not proactive, communication. The below quotes illustrate this.

“Journalists in Brussels are bombarded with information and I would create adverse feelings if I were to bombard them with things that are not of their interest.” (Interviewee no. 5)

“Mostly we do reactive communication. Journalists call me, which allows me to get a good impression of what interests them. I can choose to put certain issues to the fore by writing flash releases. But also this is determined largely by my impression of how interested the press is.” (Interviewee no. 5)

One thing is the topics raised, another is the nature of the information provided. The information that press officers provide is mainly of a background nature. This includes information on the issues under discussion, procedural questions, reasons why the discussions are taking place at the EU level and not in the member states, what the consequences of adopting or not adopting a proposal will be etc.

Information provided in writing has an official status which is not the case with information provided during briefing. As one interviewee puts it, “because they’re published, there are certain things you can’t say in a background note that you can say very easily verbally” (Interviewee no. 1). This is due to the fact that contrary to the European Commission’s spokespersons press officers speak “off the record” i.e. they cannot be quoted by the media. Sometimes the media refer to statements made by the press officers as “an EU official said”. This anonymity leaves the press officers with a significant leeway in terms of the kind of information they are able to provide to journalists verbally.

“But the fact that we can’t be quoted allows us to be quite free in what we say, without having constantly to say ‘oh what’s he going to be writing’. (...) We can maybe relax a little bit more and be quite frank. Obviously when we’re talking we remain constantly attentive to what the implications of what we’re saying might be, so obviously we’re on our guard at the same time, but the main thrust of the relevant information that we’re providing in terms of what’s new is from what we say not from what we write.” (Interviewee no. 1)

“The written form is very very constrained, because everyone is going to read it. The oral communication is more open and freer. Journalists respect confidentiality and respect the off-the-record information, which is of great value to them.” (Interviewee no. 2)

As a general rule press officers are only allowed to provide background information. In reality, however, a grey zone exists where in certain situations they provide information of
a more delicate nature. Among the information that journalists value most is information on the bargaining process that takes place when the 27 member states’ ministers meet in the Council. Writing mainly for their national audiences, journalists value such information highly because it allows them to evaluate the performance of “their” ministers. In principle press officers are not allowed to reveal the positions of individual member states or groups of member states but in some situations most of them do under the cover of anonymity. In this area press officers are in a difficult dilemma. One the one hand they are supposed to explain what goes on in the meeting room but on the other hand they are not allowed to reveal national positions. As one interviewee puts it, “this is the most tricky part or our job” (Interviewee no. 2). Among the factors that influence the extent to which press officers nevertheless reveal information about individual member states’ negotiation practices and positions are whether journalists already are familiar with national positions and only seek confirmation by the press officer and whether the individual journalist can be trusted. It is a grey zone where each press officer must decide for him- or herself how far he or she will go. Consequently practices differ considerably among press officers as the following quotes illustrate:

“You cannot say to journalists “Spain was against; France was in favour”. You just have to explain what the main difficulties are, why ministers did not agree; sometimes they understand why but sometimes you have to explain the reasons.” (Interviewee no. 3)

“In principle, I should not [state the position of member states]. But sometimes it’s unavoidable. […] So if the minister is very proud of his position and communicating on it, I can relay it. But I’m very cautious not to give something to the outside which is not public. I’m always checking that it is in the newspaper.” (Interviewee no. 3)

“If they [journalists] really push me I will confirm the country that they proposed to me, but it depends.” (Interviewee no. 7)

DISCUSSION & CONCLUSIONS

The Council press officers perceive themselves as an important source information to journalists covering EU issues and if they did not exist many insights of political negotiations and discussions would most likely not be available to the general public. At the same time communicating about negotiations in the Council is quite complex and as it appears from our findings certain issues are delicate and can only be communicated to a certain extent.

Gelders and others (2007) have pointed out that public sector communication differs significantly from communication in the corporate world because public sector organizations and private sector organizations operate in different environments and under different conditions. By comparison to private organisations, public sector organisations thus operate in a more complicated and unstable environment, are subjected to additional legal and formal restrictions, are characterized by more rigid operational and decision-making procedures, and tend to offer more diverse products and to have ambiguous objectives (Gelders and others, 2007). Our study corroborates the hypothesis of differences in terms of communicative environment since press officers at the Council Press Service affirm to be subject to at least three constraints that are of a different nature from constraints found in the corporate world, i.e. dependency on other DGs for detailed information, the Council Secretariat’s general guidelines for conducting media relations and member states’ and the Presidency’s often competing media agendas.

All interviewees report that they strive to be open and to give journalists the information they seek but on a number of occasions they are not able to fully deliver. Occasionally they fall prey to explicit limits to openness posed by highly placed bosses or the general resistance by individuals in the DGs on whom they depend for updated information and who see openness as disturbing and unnecessary.

Due to their position as civil servants in the Council Secretariat the press officers perform their duties in a very particular cultural environment that is far from any corporate environment and that seems to encourage them to act as humble and discrete service providers. The ideals of impartiality and devotion to the collective interest prevent them from acting in proactive and agenda setting ways.

The Presidency and occasionally individual member states can influence the type and quantity of information that press officers offer to the media due to the fact that the Council Secretariat’s raison d’être is to assist the Presidency and only act in ways that are acceptable to all 27 member states. This may appear to be in contradiction with the principles of impartiality and transparent reporting that the majority of the interviewees adhere to.

The three restrictions are perceived by press officers to have an impact on what they can say and how much they can say on a particular issue and clearly distinguishes the conditions under which Council press officers work from the conditions of their colleagues in the corporate sphere.

The Council’s media relations activities not only differ from those of the corporate sector. They also seem to be of a different nature from those performed by the European Commission. As it appears from our findings Council press officers communicate in a reactive and a non-promotional way. In the Commission communication of a more proactive and promotional nature is not unusual. Since Council press officers need to perform media relations activities that are compatible with the cross-section of European interests, including those of EU sceptical member states, they are under more scrutiny by various actors in “the EU game” than the Commission press officers. The latter institution seems to have more room for maneuver and, due to its role in the EU institutional framework, often seeks to be agenda setting and to promote the interests of the European Union as such although some EU sceptical member states and members of the European Parliament occasionally seek to prevent it from going too far in its pro-EU communication efforts.
REFERENCES


Valentini, C. (2008), *Promoting the European Union: Comparative analysis of EU communication strategies in Finland and in Italy*, Jyväskylä: University of Jyväskylä Press


