



COMMUNICATION STRATEGY

Development of Regulatory Impact Assessment System in Croatia

1. Introduction

This Communication Strategy and Action Plan outlines the key messages that will be communicated by the Government Legislation Office (GLO) and the Twinning Project and the audiences the partnership wishes to engage with. The action plan covers the period 2011 – 2012. It is intended to guide the work of the GLO and a wider audience. The challenge is to successfully implement the plan and this will require engagement with a wide range of partners and stakeholders.

The aim of Regulatory Impact Assessment (RIA) is to assess the need for, and impact of, proposed regulations and amendments to existing regulations. They are a tool to help policy-makers consider and understand the possible consequences of Government interventions in the public and private sectors. It helps policy-makers to consider the implications of decisions for business, the public sector and society as a whole. Given that it is difficult to predict if there will be more positive than negative effects, it is necessary to assess the potential or actual benefits and costs of government policies through the evaluation of economic, environmental and social impacts. The result of analysis of regulatory impact assessment is presented in an Impact Assessment Report, enabling the Government to present evidence on the positive and negative effects of interventions and review the impact of policies after they have been implemented. This ensures that stakeholders understand why Government intervention is necessary, the possible impact and to identify any potential unintended consequences. Regulatory impact assessment leads to better coordination of public policies within the public administration. In Croatia the Government Legislation Office (GLO) is the competent body to carry out the activities related to coordination of the regulatory impact assessment system.

This strategy document has been prepared as part of a Twinning Project to develop the RIA system in Croatia. The overall objective is to assist the Croatian public administration to be an efficient modern service, capable of conducting impact assessment tools as part of the development of a modern regulatory system.

The Twinning Project will address the identified gaps in the current RIA system by:

- Development of a new RIAS system through further amendment and strengthening of the draft RIA law and RIA methodology
- Building the administrative capacities of the Government Legislation office and key ministries

- The development of knowledge and skills relating to RIA through workshops and pilot projects
- Improving implementation of regulatory impact assessment methodology into the national policy making process - through capacity building of the GLO and regulatory institutions - ensuring awareness of stakeholders and the wider public about the implementation of RIA coordination system
- Communicating the impact assessment policy (strategy and action plan) to relevant state administration bodies, stakeholders and the public.

The Communication Strategy sets out the background, overall objectives, main stakeholders and audiences, ways to engage and potential risks. The aim is to ensure that the Government Legislation Office delivers a clear and coherent message about the importance of better regulation, acknowledges the affect of regulatory impact assessments on stakeholders – particularly the business community – and provides support. The strategy is aligned to the Government Legislation Office’s overall objectives and delivers a clear and consistent message.

2. General Legislative Background

Until now, the current regulatory environment in Croatia has not been continuously and effectively positioned towards facilitating of administrative procedures and towards a comprehensive risk assessment for the private sector. The public administration finds it difficult to assess the consequences of its actions on the private sector. A systematic assessment and review of the impacts of new regulations to ensure they meet their intended objectives was not regulated by a single legal act.

Steps were made to improve the regulatory environment through a short-term regulatory reform project – HITROREZ (completed in 2009). The purpose of the project was to systematically review current business regulations, with the aim of removing unnecessary, inefficient, obsolete and redundant regulations and to determine whether they pose any normative or administrative barriers.

According to the Rules of Procedure of the Croatian Government, the Government has permanent working bodies, which include: the Coordination for Interior Affairs, the Coordination for Social Issues and Human Rights, the Coordination for Regional Development and the Coordination for Economy. Permanent working bodies have their own expert task forces.

In line with the Rules of Procedure, the draft proposals of laws and other regulations must be attached to the opinion of the Government Legislation Office, Ministry of Finance and the Ministry of Foreign Affairs and European Integration, and other central bodies of state administration whose scope includes issues governing these proposals. In addition the Rules ask for consultations with relevant non-governmental organisations. In 2005, 2007 and 2009 the Rules of Procedure were amended to incorporate Regulatory Impact Assessment (RIA) procedures into legislative drafting, including the requirement to submit impact assessments (fiscal, economic, environmental and social) with normative acts proposed to the government and the parliament, prepared by each of the relevant bodies and approved by the Ministry of

Finance, Ministry of Economy, Labour and Entrepreneurship, Ministry of Environmental Protection, Physical Planning and Construction and Ministry of Health and Social Welfare respectively. The amended Rules also define the role of GLO in processing RIA reports and provide quality control and monitoring. The former legal framework of the RIA system relied on several regulations.

On 15 July 2011 the Croatian Parliament passed the Law on Regulatory Impact Assessment which has also been prepared within the above-mentioned Twinning Project. The Law defines the Regulatory Impact Assessment System in the Republic of Croatia in a comprehensive way, which contributes to the better quality of informing the public and the participation of the interested public in the process of drafting and making of the regulations.

3. Current Position

The Public Relations Office of the Croatian Government informs the public on the politics and activities of the Government of the Republic of Croatia, informs the Government on the contents and the views of the media and the public, carries out direct communication with the public, coordinates communication activities of Government Offices and the Ministries and performs other duties in relation to the Media Act.

The Office has two departments: the Department for Media and Analytics and the Department for Citizens. They receive about two hundred questions per month. There is no involvement with television or radio. Most ministries also have a communications office. It is understood that the focus of most external communication activity from the Ministries is reactive. It tends to take place once decisions have been made, with a focus on the print media (press activity) and some involvement in broadcast media (radio and events). Digital and social media are less commonly used, likewise engagement through stakeholder focus groups, to test ideas and consult. There are six national newspapers that have, between them, a broad 'reach' and are widely read and a business newspaper. Regional and trade publications do not have as much reach or impact. There is one media agency for radio that produces news to be covered by local radio stations. A television programme broadcast once a month – "How Government Governs" may provide an opportunity for a discussion about RIA.

Research indicates that business interaction to gain information on legislation is low. Those businesses that do seek information tend to use websites or refer to publications. Gaining information through training and seminars is a less popular way of gaining information. There is evidence that some entrepreneurs would like to be more actively involved and express their views and the establishment of focus groups would be a way to overcome this and reach a larger audience. A focus group comprised of representatives from the public and private sector, business organisations, NGOs and other relevant stakeholders would provide a two-way channel of communication and enable Government to gather information about the impact of legislative changes and a platform for feedback and evaluation.

4. Objectives of the Strategy

The purpose of this strategy is to support the main Twinning Project objective: to create an effective implementation of a sustainable RIA programme and communicate this to all known stakeholders and audiences so that they know how to access pre and post legislation and

understand the value that impact assessment brings. The implementation of the proposed actions and goals set out in the Strategy and Action Plan will build awareness and lead to good communication.

The objective is to secure the commitment of a defined group of stakeholders to the project aims. This means clear communication with Ministries in order to address any misconceptions and provide reassurance about the introduction of the new RIA process. The aim is to achieve greater awareness and an improved understanding of the requirements of RIAs – through involvement with all stakeholders and explaining how they can participate in policy development. A public awareness campaign and targeted package of training and support – to be provided by the Twinning Project - will facilitate this. Participation among partner bodies will be encouraged.

This strategy will work in harmony with the training and consultation part of the project and consider stakeholder engagement. It is intended to raise awareness of impact assessment policy and educate those involved in the RIA process so that they can play their role effectively.

4.1 Specific objectives include:

- Adoption of the Communication Strategy and Action Plan
- Design and implementation of a public awareness campaign for regulatory impact assessment
- Ensure key stakeholders and other interested parties, including the general public, are kept informed about impact assessment

4.2 Communication Objectives

Communication objectives are to increase understanding, educate and create advocacy. There are three priorities that the communication strategy seeks to establish:

- To raise awareness and understanding of RIA so that audiences and stakeholders understand what it is about and the value it brings
- To educate those involved in the RIA process so that they can play their role effectively
- To engender advocacy

Better communication will support the project objective of creating effective implementation of a sustainable RIA programme – one in which stakeholders and audiences understand and, where appropriate, know how to execute. Many businesses are unprepared for legislative changes - raising awareness will help them meet requirements. Opening communication for the stakeholders ultimately strengthens the communication between the public administration and the general public.

5. Channels of Communications table

Stakeholder/Audience engagement

- Raise awareness and understanding amongst key business organisations and NGOs
- Raise awareness and understanding amongst Senior Officials and Ministers – telephone calls and face-to-face
- Raise awareness and understanding amongst Parliamentary Committees
- Work with and through business organisations and other intermediaries to raise awareness and understanding; promotion what is being done and the benefits through their channels, e.g. websites, newsletters, publications and meetings
- Use the member newsletters produced by the Chambers to raise awareness and understanding within business sector
- Set up a government network to run seminars, share best practice, presentations and provide mutual support
- Assess how to engage Inspectors
- Use NGOs to deliver key messages to the public

Marketing and Website

- Develop and test project key messages
- Develop A5 ‘key facts’ flyer’ for distribution showing what RIA is about and how it benefits audiences
- Distribute link to ‘key facts flyer’ to all key stakeholders
- Ensure hard copy flyers are taken to all events and conferences
- Develop the GLO website hosting clear, simple and easily accessible information
- Recommend the GLO website link to all business groups and key stakeholders for sign-posting from their own websites and literature
- Ensure all business cards, letter heads and any other outward facing materials show the website link
- Use case studies (stories) developed by ‘training strand’, showing impact on different stakeholders and audiences, to develop as material and also for website and newsletters.

Events

- Establish a forward calendar of key events and conferences that will be attended by stakeholders and audiences
- Run two public events to raise awareness and understanding of RIA and its benefits
- Education and inform journalists about RIA

6. Stakeholders and Audiences

In preparation of the strategy key stakeholder groups and audiences have been identified and consulted. Meetings were held with key stakeholders and a stakeholder ‘map’ was produced to show those groups with the highest priority in terms of communication with GLO and likely to have a stake in the regulatory impact assessment process. In Croatia 99% of

businesses are small or medium sized enterprises (SME) and at least 80% are micro businesses (i.e. ten staff and under).

There are four key stakeholder groups and audiences:

- Public sector, e.g. RIA co-coordinators, Ministers, Ministry Officials and Inspectors
- Business and business organisations
- Parliamentarians, e.g. Committees and Ministers
- NGOs and Civil Society, including the Academic Community

The Communications Office at the Government Legislation Office is in regular contact with media. The media has not been a high priority for engagement pre-legislation but needs to be engaged as soon as legislation is through. Generally, most communication activity in Croatia is carried out through the media and events; digital and social media to a lesser degree.

The Chamber of Economy, Chamber of Trade and Crafts and the Croatian Employers' Association will play an important role in informing businesses about the RIA process.

7. Key Messages

A mix of communication tools will be used, e.g. printed information, radio, website and user groups. Statements and all other communications will be clear, simple honest and unambiguous in order to resonate and have impact. They will be tested on key audiences to ensure effectiveness. Examples are:

- *Better regulation means better outcomes for everyone, reducing burdens on business*
- *Improved information for Government to base its decisions on means-effective regulation that is fair and proportionate for business*
- *By speaking out you can make a difference or change things*
- *RIA improves inspection and enforcement for businesses*
- *Less red tape for those who are regulated*
- *RIA is in harmony with EU law and procedures*

Working with stakeholders will ensure maximum reach and impact. Those involved in the RIA process require good information and effective use of resources. Messaging must be clear, simple, honest, unambiguous and consistent - accompanied where appropriate by a 'key facts about RIA' document that includes a list of the main channels for communicating with stakeholders.

A working group, including representatives from a business organisation, media and Ministries, will facilitate the communication process.

8. Implementation of the Communication Strategy

The Communication Strategy and Action Plan have been developed after consultation with stakeholders and audiences. The Action Plan is an integral part of the strategy and defines the tasks to be performed by the GLO. It will encourage the development of regular communication with stakeholders pre and post legislation. The media will play a key role in the post legislation stage. The Strategy will work in harmony with the training and consultation strands of the twinning project and placed on the GLO website.

The Action Plan is attached at Appendix A.

9. Budget and Resources

In order to achieve the best outcome it is considered good practice to work closely with business organisations and other interested parties. It is even more essential in this case as there are limited resources within the twinning project to implement a communication and public awareness campaign. Human resources include an allocation of 55 Short-Term Expert days and the members of the GLO team but no financial resources to engage Croatian communication or PR experts who know and understand the local market. However it should be mentioned that the communication activities of interested stakeholders, especially the business community (for example: the co-operation established with the Croatian Employers Association resulted with two RIA articles in the *Business Daily*) are complimentary to the twinning communication activities.

10. Measuring Success/Evaluation

The purpose of evaluation is to provide feedback from stakeholders and will be monitored and continually assessed to ensure we communicate with all our audiences effectively. The results will be used to amend the strategy where necessary. It is important to know we have succeeded and met our objectives. If necessary the strategy may be adapted in the future.

Questions to be asked are:

- Have we achieved the objectives, e.g. creating awareness of RIA?
- Was the right audience reached?
- Did they understand what the message was and what had to be done?
- Have we used the right approach?

11. Potential Risks

- Increased communication may unrealistically raise expectations with stakeholders and audiences
- Inadequate resources to make an impact