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Article

European funds at the level of the Spanish autonomous communities: Is administrative communication discouraging open innovation?

Journal of Open Innovation: Technology, Market, and Complexity

Provided in Cooperation with:

Society of Open Innovation: Technology, Market, and Complexity (SOItmC)

Suggested Citation: Martín-Llaguno, Marta; Vilaplana-Aparicio, María J.; Gandía-Solera, Isabel (2022) : European funds at the level of the Spanish autonomous communities: Is administrative communication discouraging open innovation?, Journal of Open Innovation: Technology, Market, and Complexity, ISSN 2199-8531, MDPI, Basel, Vol. 8, Iss. 3, pp. 1-16, https://doi.org/10.3390/joitmc8030124

This Version is available at: https://hdl.handle.net/10419/274425

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Article European Funds at the Level of the Spanish Autonomous Communities: Is Administrative Communication Discouraging Open Innovation?

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Abstract: Spain is at the bottom in the absorption of European funds, and there is a need to research why. This paper starts from the idea that the problem could, among other issues, be related to the ineffectiveness of administrative communication, both in terms of transparency and dissemination. These dimensions are key for the innovation and open government principles endorsed by the better regulation initiative of the EU and have hardly been studied in this respect by academics. For the period 2021–2027, Spain will receive more than 34,692 million euros from the ERDF and ESF+ funds. The autonomous communities and cities must report on this aid based on communication plans and strategies for the operational programs. After compiling them, assessing their ease of access and analyzing some of their characteristics, such as the levels of execution of their budgets, this research analyzes how the 19 official websites inform about the ERDF and ESF. In several cases, the results point to inefficient institutional management of budgets for communication, as well as obstacles to accessing online content, which is key to transparency. The extent to which these shortcomings may be related to the lack of demand for European funding could be analyzed in future studies.

Keywords: dissemination; communication; grants; public funds; ERDF; ESF; EU; Spain

1. Introduction

Spain is at the bottom in the absorption of European funds. For the Multiannual Financial Framework 2014–2020, there were 56,548 million euros: in June 2021, 43% of the budget had been executed and, although there is no official data, according to Kantar's innovation barometer [1], only 15% of companies applied for EU grants in Spain. The correct use of subsidies, essential for fostering innovation economies, is a challenge that requires identifying the obstacles that prevent this from being achieved. The reasons for low uptake are of academic concern, with Kersan-Škabić and Tijanić [2] pointing to the influence of the economic characteristics of regions, Moreno [3] to regional variation, Marinas and Prioteasa [4] to lack of administrative capacity and Horvat [5] to decentralization.

However, recent studies in Spain also point to shortcomings in transparency [6,7] and in the dissemination of regional and national subsidies [8,9]. In a study conducted with 1004 companies, the lack and deficiency of information appeared as the main reason for not applying for European funds [10]. Furthermore, as Martín-Llaguno et al. [10] indicate, one of the main shortcomings is that the indicators that are measured only refer to companies that receive funds, i.e., the measurement of the impact of policies is only done on a specific part of the population.

Researching these flaws seems essential, since, as Baiges et al. [11] stated, open and efficient policies need: (a) to share information to regulate jointly, (b) to develop ICT solutions and services and (c) to improve the communication provided. As Bogers et al. [12] claim, open innovation also relates to policy making. In fact, it is a major component for the Better Regulation Agenda of the EU, and specifically for propelling its innovation principle.



Citation: Martín-Llaguno, M.; Vilaplana-Aparicio, M.J.; Gandía-Solera, I. European Funds at the Level of the Spanish Autonomous Communities: Is Administrative Communication Discouraging Open Innovation? J. Open Innov. Technol. Mark. Complex. 2022, 8, 124. https:// doi.org/10.3390/joitmc8030124

Received: 13 June 2022 Accepted: 11 July 2022 Published: 14 July 2022

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Copyright: © 2022 by the authors. Licensee MDPI, Basel, Switzerland. This article is an open access article distributed under the terms and conditions of the Creative Commons Attribution (CC BY) license (https:// creativecommons.org/licenses/by/ 4.0/). The European Commission and other public authorities should not only provide funding, "but also help the companies they fund to navigate the complexities of regulation—as a kind of 'after-sales service'. If we want innovation to enter different sectors, we need to help entrepreneurs to understand and use better the regulatory framework" (p. 11).

As the European Commission [13] states "Given the opportunities and challenges that lie ahead in the COVID-19 recovery and the green and digital transitions, it is more important than ever to legislate as efficiently as possible". In a revision study, Alvarez Suarez [14] identified that one of the pending issues for better regulation principles in Spain was programs for the communication and diffusion of rights and mechanisms available to citizens.

On 13 April 2016, in the inter-institutional agreement between the Council, the Parliament and the Commission on better regulation, the EU agreed to work towards making all rules comprehensible and enabling citizens, public administrations and businesses to easily understand their rights and obligations. Thus, these institutions committed themselves to include appropriate reporting, monitoring, and evaluation requirements [15].

European institutions' "reception" role has been impelled with initiatives such as "Have your Say", a website where the Commission publishes roadmaps, Commission proposals for EU legislative acts, draft delegated acts and draft implementing acts; and stakeholders and citizens have the opportunity to provide feedback in an open format. This means they can formulate and highlight issues and topics [16]. However, the administration not only has this "reception" role, but also an important "transmitter" one. The successes or mistakes that originate from this responsibility have important effects on the implementation and effectiveness of policies [17].

This article analyzes the regional communication plans and strategies (required by the EU) and the information on official regional websites on two of the five European Structural and Investment Funds (ESIF): the European Regional Development Fund (ERDF) and the European Social Fund (ESF). Both are among the most important ones and, for the period 2021–2027, will represent a regional distribution in Spain of more than 34,692 million euros.

On the one hand, the ESF has been the main instrument through which Europe has invested in people, supporting job creation. All European regions are eligible for this funding [18], whose budget for the entire European Union for the period 2021–2027 is more than 99 billion euros. Thus, the new ESF+ will specifically invest in social innovation (through the Employment and Social Innovation Strand—EaSI) as a priority area.

On the other hand, the main objective of the ERDF is to strengthen the economic, social, and territorial cohesion of the EU by correcting its imbalances. Its priorities include support for SMEs, innovation, digitization, and digital connectivity.

Both the ESF and ERDF, essential to impel various kinds of innovation, are ordinary funds (unlike the extraordinary NextGenerationEU, created because of COVID-19), that is, permanent EU instruments. They have a shared organization, which means that the European Commission delegates their management to national, regional and/or local administrations. The different autonomous communities that draw on these funds must, imperatively, develop and comply with a communication strategy to guarantee their transparency and dissemination, according to the Better Regulation Agenda [11]. Thus, each autonomous community and city must draw up a plan establishing communication's objectives, information measures, tools to be used, responsible bodies, an indicative budget and a monitoring and evaluation system. These plans must be public, accessible, and assessable.

Communication strategies are crucial to comply with the requirements established by the EU, indeed "Better regulation goals," and to ensure that companies are aware of calls for proposals and tools and, therefore, that aid can be absorbed. Their analysis and implementation, however, have hardly been addressed. The study of the effectiveness of administrative communication seems essential in a context in which 200 billion euros (to be distributed and implemented between 2021–2027) are expected to reach Spain. The objective of this exploratory study is to review some dimensions related to communication about European Funds in Spanish Autonomous Communities¹ to fill this gap in the literature.

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We structured this paper as follows. In the "Literature review" section, we explain the regulatory framework (both European and national) on transparency and dissemination that affects the communication of structural funds. In particular, the requirements of the Commission and the obligation to develop communication plans for regional operational programs are discussed. The "Research methods and scope" section introduces the proposed methodology, with the analysis of some issues of regional operational communication plans and the revision of some communication requirements in official websites of autonomous communities. It also states the goals and hypothesis of the study, based on our general assumption that, despite detailed and concrete regulations, there are flaws in the institutional information management in Spain. The "Results" section presents empirical findings, which are commented on and contrasted in the "Discussion" section.

2. Literature Review

2.1. Communication in Grants and Subsidies: Transparency, Dissemination, and Good Governance as EU Goals

The international economic crisis of 2008 led to a delegitimization of institutions that brought the concept of transparency into the public arena. To restore trust, an emphatic discourse on the need for accessibility to information was promoted in two ways: active, linked to the duty of public administrations to make information available to citizens; and passive, conditional on citizens requesting the information they deem appropriate from administrations [19].

The crisis generated by the COVID-19 pandemic seems, however, to have strengthened the EU's image, especially following the articulation of the NGEU program in 2021, which has boosted confidence in this institution. Nonetheless, misinformation, in its broadest sense, is still a problem [20].

Citizens require information, and not only on social issues, but also on governmental and fiscal matters [21]. This is one of the European Union's concerns to ensure visibility and awareness of its policies. The communication of grants and funds (as part of them) is essential for three reasons: it ensures the clarity of allocation processes and allows citizens to know where their taxes are going; it contributes to the beneficiaries' awareness of the subsidies; and finally, it emphasizes the sense of belonging to the European Union [22].

In the same way, communicating the supported innovative projects not only avoids duplication of projects with the same objective, but also optimizes resources and stimulates open innovation. This last aspect makes it possible to overcome the challenges facing society thanks to collaboration with other entities and the sum of joint capacities. Open innovation is therefore on the European Commission's agenda, which seeks to reinforce its position as a leading continent in science and innovation [23].

In Spain, this interest has also been reflected in several initiatives whose aim is to create ecosystems that are committed to open innovation [24] and even in different public grants financed with Next Generation funds and aimed at promoting open innovation in start-ups located in different Spanish regions [25].

Transparency is the subject of specific attention from the Commission [26], since it is a key issue for the "Better regulation" policy, which acts as an implementation's premise of any public intervention to ensure that its main goals are achieved at minimum costs [14]. Following the political need to offer European citizens and businesses an interface, the Commission fostered this initiative in 2002 to make the EU law lighter and less costly by ensuring that the whole policy cycle was designed in a transparent manner and supported by the best available evidence. In 2015, the Regulatory Fitness and Performance program (REFIT) implemented a system of impact assessments, ex post evaluations, fitness checks and stakeholders' consultations.

There has been, therefore, in the EU and its member states, a commitment to improve public services based on the modernization of the hierarchical structures of administrations within the paradigm of "Open Government" [27], applying mechanisms to satisfy citizens' right of access to public information as an essential part of "Good Governance" [28].

Web portals and social media are important resources for this (essential elements for the dissemination of aid and compliance with transparency requirements) [29]. However, studies affirm that online communication regarding public policies and certain subsidies still has room for improvement and reduced effectiveness [30,31].

Beyond transparency, the communication of grants also requires dissemination. This is the understanding of centrally managed European programs, such as Horizon 2020, in which, after identifying differences between states in the dissemination of the results of the innovation supported [32], 816.5 million euros have been allocated. Recipient companies must now design communication plans with measurement systems [33,34], including traditional and new media, such as Twitter [35] or Facebook [36]. The manual "TOOLKIT for the evaluation of the communication activities", which provides guidelines for planning and evaluating communication activities in projects, guides effective communication [37].

Despite the progress made in the Commission's recommendations and in the requirements for the recipient companies, the evaluation of the communication strategies of the administration, as well as their efficiency and effectiveness, as a key element for open government, open innovation, and better regulation, is still an unresolved issue.

2.2. Dissemination and Transparency in the EU and Spain

The European Union and the Spanish central government have established a legal framework with various legal texts to ensure that the "Better regulation" policy requirements are accomplished, and aids and funds are correctly publicized.

On the one hand, the EU specifies the reporting obligations for companies receiving aid in Regulation 1303 of the European Parliament and of the Council of 17 December 2013 [22]. On the other hand, the European Framework for State Aid for Research and Development and Innovation [38] requires that member states, the Commission, economic operators, and the public must be able to find all the necessary information on aid granted, i.e., it must be accessible.

Spain also has several legal documents on the subject. Firstly, Law 38/2003, of 17 November, General Law on Subsidies [39], specified that "beneficiaries must adequately publicize the public nature of the financing of programs, activities, investments or actions of any kind that are subsidized, under the terms established by regulation" (p. 22). This text established the creation of a National Database of Subsidies (https: //www.infosubvenciones.es (accessed on 8 December 2021) to function as a national publicity system, obliging the granting administrations to report on calls for proposals. Beyond disclosing grants, the aim was to find out to whom they had been awarded, although this database does not specify the origin of the funds.

Law 15/2014, of 16 September, on the rationalization of the public sector and other measures of administrative reform [40], clarified the previous rule, establishing that the National Grants Database must contain: "reference to the regulatory bases of the grant", "call for proposals", "program and budget appropriation to which they are allocated", "purpose or objective of the grant, identification of beneficiaries", and "amount of grants awarded and actually received, decisions on reimbursement and penalties imposed" (p. 34).

Finally, Law 19/2013 of 9 December, on transparency, access to public information and good governance [41], which determines how the transparency framework in Spain should be, established the Transparency Portal (https://transparencia.gob.es (accessed on 8 December 2021), with which it sought to guarantee citizen access to information of various types: institutional, organizational, planning, legal, economic, budgetary, and statistical relevance [42]. It was specified that beneficiaries "must publicize the subsidies and aid received", the "amount, objective or purpose and beneficiary" [41] (p. 11). The regulation established that the information must be published "in the corresponding electronic sites or web pages and in a clear, structured and understandable manner for all interested parties and, preferably, in reusable formats" (p. 9).

Despite these extensive legal resources, the communication, transparency, and accountability efforts made in Europe in relation to the structural funds are not found in Spain, neither at national nor regional level [43]. Thus, there is a need for "more citizen-friendly" communication [43] (p. 73) that allows for a greater impact on SMEs, which are the ones that have the most difficulties in finding out about and accessing the funds.

The European Union has laid down the rules on dissemination and transparency measures for the Structural Funds in Regulation (EU) No 1303/2013 of the European Parliament and of the Council, as referred to in Title III, Chapter II and Annex XII, as well as in Implementing Regulation (EU) No 821/2014.

These texts stipulate that "information and communication measures shall be ensured by those responsible in the Member State and the managing authority" in accordance with a "communication strategy", which should provide for minimum standards. Among other things, it is noted that "the objectives of the program" and "funding opportunities" must be widely disseminated to potential beneficiaries and "all interested parties, together with details of financial support from the Funds" (p. L 347/459).

In other words, businesses must be able to access the relevant information, and this information must be up-to-date and accessible, at least in terms of funding opportunities and calls for proposals; eligibility conditions; description of procedures; selection criteria for operations; contacts who can provide information; and the responsibility of beneficiaries.

In Spain, the Spanish Group of Information and Publicity Managers—Grupo Español de Responsables en materia de Información y Publicidad (GERIP)—was created to communicate about European funds to meet the requirements of all regional administrations (Autonomous Communities) and the General State Administration (from now on, AGE) [44]. GERIP oversees the design of the communication strategies of the Pluriregional Operational Programs and the framework for the design of the rest of the Communication Plans that the State must submit to the European Commission.

3. Research Methods and Scope

3.1. Research Method

A mixed design, combining quantitative and qualitative data analysis, was used to conduct our study. This mixed method represents a set of systematic and empirical processes involving the compilation and analysis of quantitative and qualitative data that allows us to have a better understanding of the object of study [45]. Thus, as will be explained in more detail below, data have been collected based on a protocol validated with experts, and the texts of the communication plans have been analyzed.

3.2. Research Scope

We started from the website of the Ministry of Labor and Social Economy (https: //www.mites.gob.es/uafse/es/comunicacion/index.htm (accessed on 5 October 2021), where the communication strategies of the regional operational programs are compiled. From this website, questions related to the communication plans were coded by applying an analysis protocol. After the protocol was developed, it was validated using the expert judgement method [46]. Specifically, four experts, two specialists in communication and two specialists in public grants were asked to give their opinion on the suitability of the protocol. Annex I contains the final protocol.

In addition, between November and December 2021, the websites of each of the 17 autonomous communities and 2 autonomous cities in Spain (Table 1), where information on ERDF and ESF funds is collected, were located. These pages were coded according to the protocol (Appendix A), which includes variables relating to ease of access to content and information on the funds, with special attention to references on how Spain benefits from being part of the EU.

Community/Autonomous City	Official Website
Andalusia	https://www.juntadeandalucia.es/ (accessed on 15 November 2021)
Aragon	https://www.aragon.es/ (accessed on 15 November 2021)
Asturias	https://www.asturias.es/ (accessed on 15 November 2021)
Balearic Islands	https://www.caib.es/govern/index.do?lang=ca (accessed on 16 November 2021)
Canary Islands	https://www.gobiernodecanarias.org/principal/ (accessed on 16 November 2021)
Cantabria	https://www.cantabria.es/ (accessed on 17 November 2021)
Castile and Leon	https://www.jcyl.es/ (accessed on 18 November 2021)
Castilla-La Mancha	https://www.castillalamancha.es/ (accessed on 22 November 2021)
Catalonia	https://web.gencat.cat/es/inici (accessed on 23 November 2021)
Valencian Community	https://www.gva.es/es/inicio/presentacion (accessed on 24 November 2021)
Extremadura	http://www.juntaex.es/web/ (accessed on 25 November 2021)
Galicia	https://www.xunta.gal/portada (accessed on 29 November 2021)
Community of Madrid	https://www.comunidad.madrid/ (accessed on 30 November 2021)
Region of Murcia	https://www.carm.es/web/pagina?IDCONTENIDO=1&IDTIPO=180 (accessed on 1 December 2021)
Autonomous Community of Navarre	https://www.navarra.es/es/inicio (accessed on 2 December 2021)
Basque Country	https://www.euskadi.eus/gobierno-vasco/inicio/ (accessed on 3 December 2021)
La Rioja	https://web.larioja.org/ (accessed on 7 December 2021)
Autonomous Community of Ceuta	https://www.ceuta.es/ceuta/ (accessed on 9 December 2021)
Autonomous Community of Melilla	https://www.melilla.es/melillaPortal/index.jsp (accessed on 13 December 2021)

Table 1. Spanish autonomous communities and their corresponding official websites.

Finally, two coders (with a Kappa index of 0.95 for inter-reliability and 0.96 for intrareliability) completed the Excel files and then transferred the information to SPSS26.

3.3. Research Objective

In a context in which Spain is expected to receive more than 34,692 million euros from the EU for ERDF and ESF+, this research focuses on the study of the communication of the autonomous communities in these programs. More specifically, the following objectives are proposed:

A/To assess levels of access and compliance (with special attention to the budget) of communication plans and strategies of the regional operational programs in the different autonomous communities.

B/To assess levels of compliance with some European information requirements of the online communication on ERDF and ESF by the autonomous communities through their official websites.

The basic starting assumption is that, despite detailed and concrete EU regulations, there are flaws in institutional information management. Specifically:

H1. *There are no clear templates, formats and access to EU-required communication plans and strategies on European funds.*

H2. There is a disparity in the execution of budgets earmarked for communication, so that although money is available for this purpose, not all autonomous communities use it consistently and effectively.

H3. Information on European funds is not well developed on some regional websites.

4. Analysis

4.1. The Communication Strategies of the Multi-Regional Operational Programs

4.1.1. Access

Accessing the regional communication plans and strategies on European funds is not easy unless it is done from the secure page of the Ministry of Finance (https://www.mites. gob.es/uafse/es/comunicacion/index.htm (accessed on 15 November 2021). Although in all cases the documents are posted on a website, they are not accessible from the main menu of the official website of the region where European funding is discussed (see Table 2).

The Communication Plan	Categories	Yes (%)	No (%)	NO.
Can we get the communication plan in the initial search engine?	Yes/No	41.6	58.4	
	(1) Communication Plan	29.1	70.9	
With which coarch strategy does it appear?	(2) Communication Strategy	37.5	62.5	
With which search strategy does it appear?	(3) Communication	25	75	
	(4) Other	0	100	
Is the communication strategy document published/posted?	Yes/No	100	0	
	(1) Autonomous Community page	79.1	20.9	
Where?	(2) Specific Page Funds	25	75	
	(3) Other pages	4.1	95.9	1
Is there direct access to the document from the main menu?	Yes/No	0	100	
Clicks until you reach the document	Numeric			
1 to 5	Yes/No	20.8	79.2	5
From 6 to 10	Yes/No	75	25	
More than 10	Yes/No	4.1	95.9	1
Does the title of the section correspond to the subject?	Yes/No	83.3	16.7	
	What kind of information appears?			
- Summary of what it is about	Yes/No	25	75	
	(1) Updated	36.8	63.2	
	(2) All	31.6	68.4	
- Versions of the document	(3) Initial	15.8	84.2	
	(4) Updated and Initial	5.3	94.7	1
	(5) There is an updated version			
	and a non-updated version			
- Is the latest version of the posted document dated?	Yes/No	62.5	37.5	
If the answer above was "yes", which of these options?	15 of 24			
* 2016–2017	Yes/No	12.5	87.5	
* 2018–2019	Yes/No	16.6	83.4	
* 2020–2021	Yes/No	33.3	66.7	8
- Link to official website explaining what it is	Yes/No	4.1	95.9	1

Table 2. Summary of the data obtained in the communication strategies.

As Table 2 shows, all the official websites have a search engine, which, except in one case (Autonomous City of Ceuta), works correctly. However, only in 41.6% of the autonomous communities can we obtain the communication plan by this means, and the number of clicks that lead to these documents varies: from 3 in Asturias, or 4 in Extremadura or Melilla, to 10 in La Rioja and the Balearic Islands, or 14 in Catalonia.

The material concerning the communication plans and strategies of the structural funds is to be found in all the communities hidden among the information relating to the European funds, except in Cantabria, Ceuta, Murcia, and the Basque Country, where these documents are not even associated with this section (which makes it very difficult to locate them). Moreover, the ERDF and ESF communication strategies are not included together in all cases. For example, La Rioja places the ESF strategy on the community's own website, while for the ERDF strategy it takes you to the website of the Ministry of Finance and Public Administration.

Only Castilla-La Mancha, Castile and Leon and the Balearic Islands explain what these communication plans are and what their function is. The rest of the regions simply post the link.

Furthermore, the information available is not always up to date. Only 15 of the 24 documents contain the updated date: of these, only eight appear up to date during the 2020–2021 period. The Balearic Islands, Madrid, and Melilla, for example, have an outdated version of the communication strategy, Galicia's cannot be opened, and La Rioja and the Basque Country only provide information on one fund.

Finally, there is no interconnection between the communities' communication plans, and only the Region of Murcia offers links to other official websites (European, national, or regional) explaining what these communication plans are about.

4.1.2. Forms and Formats. Visual Content

Table 3 shows the information that appears on the cover page of the communication strategies.

Content of the Documents	Categories	Yes (%)	No (%)	NO.
1. Is there a slogan on the cover?	Yes/No	66.6	33.4	
1.1. Written slogans				
ERDF slogan	Yes/No	41.6	58.4	
ESF slogan	Yes/No	37.5	62.5	
Community slogan	Yes/No	16.6	83.4	
Other	Yes/No	0	100	0
2. Which logos appear?				
- CAAC	Yes/No	87.5	12.5	21
- Ministry of Finance	Yes/No	66.6	33.4	
- Ministry of Labor and Social Economy	Yes/No	50	50	
- Ministry of Foreign Affairs	Yes/No	0	100	0
- EU	Yes/No	100	0	
- Other logos				
European	Yes/No	4.1	95.9	1
National	Yes/No	4.1	95.9	1
Self-employed	Yes/No	29.1	70.9	
3. Are there any terms (beyond the title		45.0	F4 0	
of the plan)?	Yes/No	45.8	54.2	
3.1. Which ones?				
Informative text		9.1	90.9	1
Approval of the document		81.8	18.2	
Name of the CAAC		9.1	90.9	1

Table 3. The content of the documents: communication strategies and evaluations.

Overall, 66.7% (N = 16) of the plans have slogans: 12 have "official" ERDF ("A way for Europe") and/or ESF ("The ESF invests in your future") slogans. However, Andalusia ("Andalusia moves with Europe"), Aragon ("Building Europe from Aragon"), Castile and Leon ("Europe drives our growth") and La Rioja ("La Rioja grows with Europe") use their own slogans independently of the fund's communication.

All covers include EU logos, as established by Commission Regulation (EU) No. 821/2014 of 28 July 2014 [38]. However, 87.5% also include logos of the autonomous community itself. Additionally, 66.7% include the logo of the Ministry of Finance, 50% that of the Ministry of Labor and Social Economy and 37.3% others. Thus, we can see that of the Government of Spain in Galicia; that of the Public Employment Service in Asturias; that of the SOC (Servei d'Ocupació de Catalunya) in Catalonia; and Trabaj@ or the logos of the Provincial Councils in the ERDF communication plan of the Basque Country.

Disparity is also found in the terms used on the cover page of the plan. Eleven regions use locutions referring to updates, dates, slogans, or the name of the region. Andalusia, however, has at the bottom of the cover single words such as: "Analysis; Growth; Evaluations; Budgets; Strategies; Target audiences; Monitoring; Tools; Objectives; Communication; and Beneficiaries".

4.2. The Evaluation Plans

4.2.1. Budget Execution in Communication Strategies

Table 4 presents the budget allocated to implement the communication strategies in the different communities, according to the proposed objectives and means, as well as the expected results. Andalusia, Castilla-La Mancha and Galicia are the regions with the highest allocations.

Table 4. The indicative budget for the communication strategies of each CAAC in the 2014–2020 programming period.

Autonomous Community	ERDF Budget (€)	ESF Budget (€)	Total Budget (€)
Andalusia	8,200,000	3,500,000	11,700,000
Aragon	1,505,000	485,000	1,990,000
Principality of Asturias	830,000	2,466,175	3,296,175
Canary Islands	1,510,394	477,751	1,988,145
Cantabria	230,014	149,986	380,000
Castilla-La Mancha	2,800,000	1,200,000	4,000,000
Castile and Leon	948,014	948,014	1,896,028
Catalonia	2,500,000	750,000	3,250,000
Ceuta	164,058.4	37,799.99	201,858.4
Valencian Community	1,447,812	452,188	1,900,000
Extremadura	2,040,280	793,442	2,833,722
Galicia	1,672,000	2,128,000	3,800,000
Balearic Islands	399,000	126,000	525,000
La Rioja	180,000	67,000	247,000
Madrid	1,424,066	1,900,000	3,324,066
Melilla	124,950	50,050	175,000
Region of Murcia	1,446,000	440,000	2,886,000
Ŭ Navarre	350,000	150,000	500,000
Basque Country (ESF)	602,208	50,000	652,208

In Table 5, we analyze the level of budget execution based on the mid-term evaluations of the 2019 communication strategy. These evaluations are available on the website of the Ministry of Labor and Social Economy, where they assess the level of progress through the classification "coherent" or "inconsistent". As shown, 52.6% (10) of the cases are "inconsistent" and 47.3% (9) "coherent".

Table 5. Adequacy of the financial resources allocated to the communication tasks of the funds.

Autonomous Community	Consistency of Progress in Budget Implementation
Andalusia	Inconsistent
Aragon	Coherent
Principality of Asturias	Coherent
Canary Islands	Inconsistent
Cantabria	Coherent
Castilla-La Mancha	Inconsistent
Castile and Leon	Inconsistent
Catalonia	Coherent
Ceuta	Coherent
Valencian Community	Inconsistent
Extremadura	Inconsistent
Galicia	Coherent
Balearic Islands	Coherent
La Rioja	Coherent
Madrid	Inconsistent
Melilla	Coherent
Region of Murcia	Coherent
ÖNavarre	Inconsistent
Basque Country	Inconsistent

Two communities stand out: Andalusia, and Castile and Leon. In both, the expenditure executed to date was higher than the budget for communication strategy: the money is thus exhausted even though many of the planned actions have yet to be carried out.

On the other hand, some autonomous communities maintain too low a percentage of financial execution: they have not conducted the activities planned for the dates and have frozen the communication strategy. This is the case in Navarre, the Basque Country and Valencia. Similarly, in Madrid, it has not been possible to assess with certainty the proportionality of the communication strategy budget due to lack of information. Finally, in Castilla-La Mancha and the Canary Islands, the implementation of the budget was very uneven.

4.2.2. The Measures Complied

All the communities have relied on consultancy firms to draft the intermediary evaluation reports, with CDI Consulting, Competitiveness, Development, and Innovation (31.5%) and Red2Red Consultores (26.3%) being the most frequently used entities.

Only Castile and Leon, the autonomous cities of Ceuta and Melilla, the Valencian community, Extremadura, the region of Murcia, and Navarre indicate in their evaluation report on the communication plan which measures have been fulfilled. This fact, in addition to the uneven implementation, makes it difficult to assess and compare between regions (Table 6).

Table 6. Measures indicated in the assessment plans.

Autonomous Community	Measures
Castile and Leon	35 running from 36
Ceuta	6 completed and 25 in progress
Valencian Community	34 in progress out of 39
Extremadura	2 completed and 27 in progress
Melilla	5 completed and 22 in progress out of 29
Region of Murcia	4 completed and 33 measures under implementation out of 39
Navarre	10 completed and 22 in progress out of 45

Despite the lack of detail, all reports rate the degree of progress against programmed measures in three categories: high, medium, or moderate, and low.

According to this classification, six regions are in the high group (31.5% of the total) and 68.4% in the medium group. However, in this group, there are communities with execution percentages between 1 and 9% (Asturias, Canary Islands, Galicia, Madrid, and La Rioja), as opposed to regions that report an execution of 400%, such as the Canary Islands.

4.3. Access to Information on European Funds on the Websites of the Autonomous Communities

We now turn to the official websites of the Devolved Regions (Table 7). As can be noted, 89.5% of them include information on the functioning of the Structural Funds. Navarre is the only region in which these details do not appear, while in the Basque Country they appear only on the ESF.

However, few websites include information on the state or regional impact of this aid (31.6% and 52.6%, respectively).

Only 21% of the pages include the mandatory search engine (Andalusia, Castile and Leon, Valencian Community and Navarre) and, with this same percentage, only four communities indicate a contact person (Asturias, Valencian Community, Extremadura, and the Balearic Islands), as required by the European Union.

Six communities (Aragon, Ceuta, Extremadura, La Rioja, Navarre, and the Basque Country) do not include any repertoire of good practices as required.

Overall, 42.1% of the pages include a link to the EC for further information, but just 21.1% add links to the government's website, and only two autonomous communities link to other entities.

Information on European Funds	N = 19	(%)
General information: what they consist of; how they work; what they are about	17	89.5%
Impact on Spanish territory	6	31.6%
Impact on the autonomous territory	10	52.6%
Calls for applications	8	42.1%
Search for announcements	4	21.1%
Regulations	17	89.5%
Contact person	4	21.1%
Information on structural funds in previous periods	17	89.5%
Good practice	13	68.4%
Link to the European Commission's website for further information	8	42.1%
Link to an official government website where more information can be found	4	21.1%
Link to other European or national entities where you can find further information	2	10.5%

 Table 7. Information on European funds contained on the official websites of the autonomous communities.

5. Discussion

Open innovation "is" on the European Commission's agenda, which seeks to reinforce its position as a leading continent in science and innovation [23]. However, as stated by Bogers et al. [12], open innovation also "affects" policy making, as open policies are implicit elements in the EU Better Regulation Agenda.

We agree with Baiges et al. [11] that open policies need effective communication. Communication has shown especially relevant, for example, in R&D&I support programs to promote open innovation [47–49], and to create collaboration networks with competitors, suppliers, universities and research centers, among others [50–52]. In the same way, communication should be essential for open public policies, if we want to foster the involvement of agents, the adhesion of the public and the efficiency of measurements.

In its eagerness to promote open policies, the EU is making efforts in reception, putting in place mechanisms to enable "effective communication WITH administrations". However, we cannot forget transmission, as "effective communication FROM the administrations" (both in the dimension of dissemination and transparency), is also a *sine qua non* of open and efficient policies.

As previous works pointed out, communication is a barrier for Spanish companies to access EU funds [10]. This paper tried to evaluate, in an exploratory way, some aspects of the communication strategies and websites of the autonomous communities as basic and compulsory sources of information on one of the most important European policies.

In line with other studies [30,31], our exploratory research shows that in Spain, administrative communication related to the structural funds seems to have room for improvement.

First, communication plans and strategies on European funds (which are essential documents for subsidies diffusion), as we assumed in our H1, are not easy to access: the click path is long and confusing in a way that hides these documents. There are hardly any summaries explaining what these strategies are about and their usefulness, and in some regions, the information is not even up to date. Additionally, we have found that there are "no clear templates and formats", and in line with Vilaplana-Aparicio et al.'s [9] results, the information provided by the autonomous communities is very disparate.

These results are not aligned with the commitment of the Council, the Parliament, and the Commission on better regulation to include appropriate reporting, monitoring, and evaluation requirements [15].

Second, the amount of money specifically earmarked for the communication of funds is a proof that communication is crucial for the European Union—both in terms of the dissemination of aid [10] and the communication of results [8,33,34]. Nevertheless, as stated in H2, we have found a disparity in the execution of budgets earmarked for communication

between the autonomous communities, so that despite having money for this purpose, not all of them use it consistently and effectively.

The European Commission [13] stated that "given the opportunities and challenges that lie ahead in the COVID-19 recovery and the green and digital transitions, it is more important than ever to legislate as efficiently as possible". The underutilization or overutilization of monetary resources allocated to communication is a sign of inefficiency. Policy impact analyses are fundamental for better regulation policies, as they should be resource management analyses. This is an issue that UE could reflect upon when dealing with open policies.

Finally, as we assumed in H3., "The information on European funds is not well developed on some regional websites". Few pages provide easy access to all the necessary content. The regions have posted information, but there are lacks in links to other official websites, contact persons, updated information, and search engines to find calls for proposals. There are also insufficient repositories of good practice reports. One of the relevant issues that contravenes EU requirements is that, benefits of funds are not explained.

The commitment to improve regulation and promote open policies led the EU member states to work to allow citizens, public administrations, and companies to easily understand their obligations and rights [15] so that they can exercise them.

The incomplete information on the web pages (shown in the results) makes difficult for companies (which are the main recipients of the funds) to have easy access to aids and clear knowledge about them. On the other hand, the disparity in the quality of the information on the websites generates inequalities among citizens of the different autonomous communities.

6. Conclusions

In conclusion, and despite the progress made in the recommendations for "Better regulations" practices, administrative communication in the state members, i.e., Spain, may be discouraging openness and efficiency.

Even though the EU's emphasis on communication as an instrument for openness (reflected in the budgets allocated), there is room for improvement in the Autonomous Communities' transparency and dissemination of EU policies of funds.

6.1. Implication

In a context in which Spain will receive large amounts of funding that must be absorbed in a very short time, communication strategies are crucial to comply with the requirements established by the EU [22], to encourage companies to effectively use the aid [10] and to ensure that misinformation does not undermine the confidence of citizens in this institution [20].

The European Commission and other public authorities should not limit themselves to providing funding, but should also ensure the proper disclosure of the aids, especially in shared management policies. As Baiges et al. [11] say, European institutions should ensure that companies (which desire funds, but also those who already have them) are helped to navigate the complexities of regulation, in a kind of "after-sales service". Improving the administration's communication about funds in Spain seems essential. If open policies are to be encouraged, the EU should consider auditing the diffusion and transparency related to public aids in all countries.

In the case of Spain, despite GERIP's efforts to comply with EU communication requirements in all regional administrations and the National Government, a professionalized and more standardized design and management of the communication plans and strategies of the regional programs is needed.

6.2. Limits and Future Research Topic

We cannot conclude without mentioning the limitations and future lines of this work. Firstly, our study focuses exclusively on the web activity of the autonomous communities, leaving aside the analysis of other communicative actions and their impact. On the other hand, we have worked with data on the budgets allocated to communication, but it has not been possible to detect what percentage of these budgets for the websites, the main object of analysis. It remains for future work, insofar as we have access to data, to carry out an analysis of the efficiency of the actions. It is worth following this line of research on administrative communication and open policies by analyzing to what extent the deficiencies found have an impact on European aid and on the willingness to apply for it, on the capacity to implement it and on the possibility of absorbing it, as other studies suggest.

Author Contributions: All authors have participated in the conceptualization of the work, elaboration of the methodology, fieldwork, data analysis, and drafting-revising and editing of the text. All authors have read and agreed to the published version of the manuscript.

Funding: This research received no external funding.

Institutional Review Board Statement: Not applicable.

Informed Consent Statement: Not applicable.

Data Availability Statement: The raw data supporting the conclusions of this article will be made available by the authors, without undue reservation.

Conflicts of Interest: The authors declare no conflict of interest.

Appendix A

Table A1. Code for the analysis of the communication plans and strategies for operational programs.

Part 1: Documents on Communication in Operational Programs	
 Does the communication plan appear in the initial search engine? 1.1. With which search strategy does it appear? 	Yes/No 1. Communication Plan 2. Communication Strategy 3. Communication 4. Other
2. Is the communication strategy document published/posted?2.1. Where?	Yes/No 1. CAAC page 2. Specific Page Funds 3. Other pages
3. Is there direct access to the document from the main menu of the site?	Yes/No
4. How many clicks do we have to make until we get to the document?4.1. Link to the communication strategy	Numeric Open text
5. Does the title of the section correspond to the subject?	Yes/No
6. What kind of information appears?- Summary of what it consists of- Versions of the document	Yes/No 1. Updated 2. All 3. Initial 4. Updated and Initial
 Is the latest version of the posted document dated? If the answer above was "Yes", please write it down. Link to an official website where I explain what it is 	Yes/No Open text Yes/No

Table A1. Cont.

Part 2: Content of Documents	
2.1. ST Part: Communication Plan	
1. Is there a slogan on the cover? 1.1. Written slogans	Yes/No Open text
2. Which logos appear? - CAAC - Ministry of Finance - Ministry of Labor and Social Economy - Ministry of Foreign Affairs - EU - Other logos	Yes/No Yes/No Yes/No Yes/No Yes/No Open text
3. Are there any terms (beyond the title of the plan)?3.1. Which ones?	Yes/No Open text
4. What is the total indicative budget for the Communication Plan?- ERDF- ESF	Numeric Numeric Numeric
2.2. ND Part: Evaluation Plan	
5. Level of executed expenditure of the Communication Plan in 2019	(1) Consistent (2) Inconsistent
6. Who prepares the document? Type of entity	Open text (1) Consultant (2) Regional administration (3) Other
7. Does it indicate the number of measures completed?7.1. If the answer above is "Yes", how many?	Yes/No Open text
 8. How far have you progressed with respect to the actions planned according to the Evaluation Plan? (Mark with an X) - High (all indicators above 50% and high numbers) - Medium/Variable - Low (Most or all under 50% and low numbers) 	Multiple Choice

Notes

¹ In Spain, an autonomous community is a territorial entity that, within the current Spanish constitutional legal system, is endowed with autonomy, with its own institutions and representatives and certain legislative, executive, and administrative powers.

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