

Integrated Policy Paper



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The present Integrated Policy Paper aims to present the policy recommendations stemming from the research streams explored by the EnTrust team. It is based on the findings and recommendations presented in the seven European Policy Briefs (PBs), which are based on the research conducted by the team, and enriched by roundtable discussions with stakeholders.

The paper gives a holistic overview of the findings of the EnTrust research as presented in the PBs, and then provides twelve overarching recommendations stemming from them.

The personal and social conditions for enlightened trust

The main axis of the project is to explore the notion of 'enlightened trust', and how this can be applied in relation to the different levels of government. As our research¹ has shown, people tend to consider trust and distrust as separate, co-existing dimensions of the same phenomenon. Both an excess of trust and distrust towards the authorities is considered undesirable, as it could lead to an a priori following of authority, without critically examining the information at hand, or lead to a lack of institutional accountability, or an a priori rejection, which tends to generate citizens' apathy and reluctance to get involved in political life. Furthermore, trust and distrust towards institutions are based on one's own personal experiences with authorities during a whole lifetime, including the early years, and are based on respect and the possibility of having our voice heard, as well as on a transparent and predictable framework.² Such elements have to co-exist, as good interactions with, for instance, 'front-line workers' representing social services are not enough to transform trust in the individual civil servant into trust in the institutions.³

While a condition of 'moderate trust' (what we call 'enlightened trust') is considered ideal, a lack of interest or relevant information can lead citizens to a

'trust vacuum', where neither trust nor distrust can be detected, or to distrust when there is an overload of information.⁴ That is why experts, scientists, media, social partners and civil society play a key role as mediators in the development of trust and distrust relations, and as sources of reliable information.⁵ At the same time, enlightened trust can emerge only if citizens are equipped with the tools to discern reliable information from disinformation, making citizenship and media literacy crucial for that.⁶

Furthermore, enlightened trust is based on active citizenship and the possibility of disadvantaged groups in society taking an active part in public life. Active participation encompasses forms of civic involvement



in the policy-making process beyond elections; the findings of our research suggest that those that tend to participate in conventional forms of political and civic participation (such as voting) are those that have higher levels of trust in the national government.⁷ At the same time, disadvantaged groups in society have a higher level of distrust towards institutions because they are disengaged from politics, which they perceive as remote from their daily lives and as unable or unwilling to fulfil their promises.⁸ Nevertheless, social

1 European Policy Brief 3: 'The Role of Democratic Social movements in Trust & Distrust building', EnTrust, August 2022; European Policy Brief 5: 'Fostering trust in governance: insights from a developmental-psychological perspective', EnTrust, August 2023.

2 European Policy Brief 5: 'Fostering trust in governance: insights from a developmental-psychological perspective', EnTrust, August 2023.

3 European Policy Brief 2: 'Trust and Distrust at the Street-level of Public policy', EnTrust, February 2022; European Policy Brief 7, 'A vibrant civic space and trustworthy civil dialogue at the EU level', EnTrust, September 2023.

4 European Policy Brief 5: 'Fostering trust in governance: insights from a developmental-psychological perspective', EnTrust, August 2023.

5 European Policy Brief 1: 'The theoretical and normative underpinnings of trust and distrust', EnTrust, September 2020.

6 European Policy Brief 4: 'Building Trust and Distrust in the Media: The Role of Disinformation and Media Freedom', EnTrust, June 2023.

7 European Policy Brief 6: 'Appraising Citizens' Trust and Distrust in Governance', EnTrust, December 2023.

8 European Policy Brief 2: 'Trust and Distrust at the Street-level of Public policy', EnTrust, February 2022.

movements contribute towards activating those that have less trust in the system⁹ and promote a vision of enlightened trust (or ‘healthy distrust’) towards the political institutions, and tend to collaborate with more structured actors of civil society, such as the Non-Governmental Organisations (NGOs).¹⁰ Therefore, a political system that promotes enlightened trust must consider social movements and civil society organisations as legitimate and necessary actors in the policy-making process in representing citizens’ voices, enable the space for effective influence of all these diverse forms of citizen engagement, promote new, complementary ones and mainstream them at all levels of government.¹¹

Based on these findings, the EnTrust research proposes a series of recommendations gathered around four dimensions: a democratic framework based on the rule of law and the guarantee of fundamental rights; enhanced conditions for the development and sharing of reliable information; an enabling environment in which citizens can actively engage; a whole-societal involvement in policy-making.

A democratic framework based on the rule of law and the guarantee of fundamental rights

■ #1 Establish a specific monitoring of civic space at the national and European levels within a strengthened EU Rule of Law cycle

Enlightened trust can be exercised only by fully enjoying civic freedoms and democratic rights, including the right to protest and to assembly, both of which have seen setbacks within the EU in recent years. Since 2022, the annual Rule of Law report, which analyses each Member State, addresses specific recommendations in each EU country. The report, which from 2024 will also cover candidate countries to the EU, should include a fully-fledged chapter on civic space, based on indicators assessing legal frameworks and policies, measuring the ability of institutions to interact with civil society and social movements, as well as allowing new movements and organisations to emerge. The drafting of such a chapter should be part of a broader revision process of the Rule of Law cycle: it should include early warning systems, easily accessible to civil society and EU residents, to quickly intervene when there are punctual violations of civic rights at the na-

tional or regional levels; a stronger promotion of proactive collection of data concerning attacks against human rights defenders as a source of information for the country reports; and a thorough follow up by the Commission on the individual recommendations to the Member States, in dialogue with local civil society. Within the framework of the Rule of Law cycle, the EU should publish a report analysing the impact on civic space, fundamental rights, and operations of Civil Society Organisations (CSOs) that the EU legislative and non-legislative policies adopted the previous year, and in the phase of discussion, have had or can have.



■ #2 Increase transparency of the EU institutions: an inter-institutional agreement as a role model for the Member States

Trust in the institutions can be maintained if they are free from corruption, transparent in their decision-making processes and open for inquiry. The European Parliament should draft a report on the transparency of the EU institutions, based on the recommendations of the European Ombudsman. Such a report should lead to an agreement between all the EU institutions on common and specific measures to increase internal transparency and accountability to the public. Such measures should include: a common code of conduct for EU officials; measures to prevent maladministration, corruption, and revolving doors; publicity of the meetings of the EU decision-makers officials of all ranks, including those conducted online or via phone, as well as those labelled informal; measures to increase institutional accountability, such as a review of access to documents’ rules so as to ensure wider access, public access to the preparatory working documents of the Council, publication of the voting records of Member States in preparatory Council working groups, and the publishing of the relevant trilogue documents. The European Ombudsman should be granted the power to scrutinise and enforce such

⁹ European Policy Brief 6: ‘Appraising Citizens’ Trust and Distrust in Governance’, EnTrust, December 2023.

¹⁰ European Policy Brief 3: ‘The Role of Democratic Social movements in Trust & Distrust building’, EnTrust, August 2022.

¹¹ European Policy Brief 1: ‘The theoretical and normative underpinnings of trust and distrust’, EnTrust, September 2020.

inter-institutional agreements. In parallel, the Commission should promote a Council recommendation that would commit Member States to replicating such measures in their own national context.

■ **#3 Empower local democracy with support, investments and policy exchange via a renewed European Democracy Action Plan**

Local and regional authorities tend to be trusted more by citizens, as they are closer to their everyday lives; at the same time, they are faced with dealing with the concrete effects of the implementation of policies, and of crises and emergencies. On the other hand, there is a tendency towards centralisation, a fragmentation between different levels of power, and a struggle for local authorities to adapt to new forms of participation, to respond to citizens' needs and to face reduced capacities and resources. While such elements are not subject to direct EU policies due to the Treaty competencies, the European Union can still promote local democracy through other means. The European Democracy Action Plan should be renewed in the next parliamentary term to include a specific focus on local democracy, proposing concrete measures to support it. Among them, it should include the establishment of a flagship project of the Technical Support Instrument (the programme that provides tailor-made technical expertise to EU Member States to design and implement reforms) on how public authorities can involve and partner up with civil society in the design and implementation of policy measures, open to national and local authorities; it should review the regulations of the structural funds and of the Recovery and Resilience Facility to ensure that local authorities' and civil society's involvement in the design and implementation of the projects is thoroughly assessed and evaluated; it should promote Local Democracy as the theme of the next European week of regions and cities, in partnership with the Committee of Regions, in order to provide a space for regional authorities, EU institutions, decision makers and civil society to meet and discuss the resources, technical support, and the legal frameworks needed to empower local democracy.

■ **#4 Establish the European dimension of public services to implement the European Pillar of Social Rights**

Social service workers are the main contact point with institutions that many disadvantaged families have, and while there is a general feeling of trust towards them, that does not translate into institutional trust. As disadvantaged people feel distrust towards the institutions and a lack of interest in politics as an agent of change, it is crucial that the EU takes public service as part of its mission to implement the European Pillar



of Social Rights. Following the request of the Parliament, the Commission should propose a directive on minimum income, which should set an example of the principles that public services should adhere to, towards their users as well as their workers. Among such principles: transparency and accessibility of information, free of legal jargon, about who is entitled to such services and what criteria are used in case of discretionary decisions; simplification and avoidance of duplication of documents requested via inter-service coordination; the possibility of feedback mechanisms for the public service users, including the establishment of users' councils; inclusivity for all types of disadvantaged groups, with an intersectional perspective; support of social dialogue for frontline workers, to better their wages and working conditions and to provide training opportunities; investments in hiring staff to lower the number of cases dealt with by frontline workers and increase their quality; decoupling the figure of social worker from that of means-tester. Such principles should also be promoted via other Union instruments, including the European Semester and EU funding instruments. A European debate on public services should be promoted, involving social partners, public authorities, frontline workers and the associations of public service users.

■ **Enhanced conditions for the development and sharing of reliable information**

■ **#5 Monitor that the implementation of the Digital Services Act and the final version of the EU AI Act combat disinformation and follow a human rights-based approach**

Social media have become an important platform where information is shared and where citizens go to in order to retrieve news. In order for enlightened trust to be fostered, disinformation, distortive practic-

es and violation of human rights must be avoided. The approved Digital Services Act and the EU AI Act, in its final stages, go towards that direction, but it will be crucial to evaluate how they will impact the transparency of the political advertisements and of paid content, their impact on the respect for human rights and freedom of expression in the content moderation, and on fighting against disinformation and discrimination online. Such evaluation should be carried out with a multi-stakeholder approach, including journalists, civil society organisations and academics.

■ **#6 Ensure a strong European Media Freedom Act and anti-SLAPP directive that guarantee quality journalism as a public good**

Reliable information and trust in institutions require a media system which is free from possible capture by the agendas of political actors and the vested interests of business magnates. With the European Media Freedom Act being discussed in the European Parliament, it is crucial that the proposed law implements the European standards on public service media by strengthening the rules and mechanisms in order to enhance the independent governance and editorial independence; that it ensures transparency on media ownership; that it guarantees freedom of expression in both private and public media; that it funds projects



of independent reporting and fact-checking projects; that it guarantees the safety of journalists and reinforces the protection of sources and whistle-blowers by implementing the Council of Europe's recommendation CM/Rec(2016)4 on the protection of journalism and the safety of journalists and other media actors. The approval of a strong directive against strategic lawsuits against public participation (SLAPPs) is fundamental to preventing the silencing of journalists and independent media. In addition, journalists should have a legal right to information from public authorities, and be granted access to government docu-

ments, and transparent and non-discriminatory procedures should apply for granting operating licences to media outlets.

An enabling environment in which citizens can actively engage

■ **#7 Approve a strong directive on European cross-border associations**

Enlightened trust is based on the possibility of active citizenship, which in turn requires an enabling environment for civil society organisations to freely operate and thrive. The Commission has proposed a directive on European cross-border associations. It is crucial that the proposed directive on European cross-border associations removes the obstacles that NGOs face when operating across borders and that it promotes civic engagement. To this end, the proposed directive should be complemented by guidelines for participation, as well as training for civil servants.

■ **#8 Simplify the conditions for European funding for CSOs**

The EU has different programmes that support civil society organisations, with a project-based or operating-grant-based approach. Such diverse programmes are, however, little known to smaller organisations, and the requirements to access the calls and for reporting are prohibitive for smaller organisations. A clearer provision of information on the different programmes, prerequisites and reporting procedures should be provided, together with clear evaluation criteria. The applications should be more user-friendly, and the operating grants should allow flexibility and long-term planning for the CSOs operations. A strong feedback mechanism on the goals of grant-making and on the application and reporting requirements should be in place.

■ **#9 Integrate media literacy and civic education in the curricula by implementing the Audiovisual Media Services Directive and monitoring the implementation of the Council recommendation on promoting common values, inclusive education, and the European dimension of teaching**

Active citizenship is also based on knowledge of the political institutions, methods of civic engagement and media literacy on decoding information and recognising disinformation. While the EU has only supportive competences on education, it has the possibility to encourage the Member States to legislate on such topics. Article 33a of the revised Audiovisual Media Services Directive calls on the Member States to develop programmes to enhance citizens' media

literacy skills. Such a goal can be reached by including them in the curricula and via specific educational programmes involving journalists, IT specialists, and other professional groups. Furthermore, the Council approved a recommendation on promoting common values, inclusive education, and the European dimension of teaching, which endorsed the usage of the Council of Europe's Competences for Democratic Culture framework. The Commission should produce a report on its implementation and propose concrete tools to implement its provisions, such as specific strands within EU funding programmes. Civic education programmes should also involve civil society organisations and movements, as well as universities, and should accompany theoretical classes with simulation games that can help students better understand complex political structures, and show the relevance of politics to everyday life.

A whole-societal involvement in policy-making

■ #10 Enhance youth political participation and youth perspective in policy-making

According to Eurostat, people aged 15-29 are 16% of the EU population. As an under-represented demographic group, special attention should be paid to enhancing their political participation as a vehicle for citizen agency and enlightened trust. Measures that could be taken into consideration at the European and Member States' level include: lowering the voting age (e.g., Austria, 16 years of age) and the age requirement to pursue political office (e.g., Denmark, 18 years of age); introduce youth quotas in the legislative assemblies, adaptable and mirroring the proportion of those under 35 in the population; strengthen youth dialogue; and introduce a Youth test, evaluating the impact of legislative proposals on young people with the aim of integrating youth perspectives into all policies.



■ #11 Implement the Article 11 of the Treaty on European Union (TEU) and create a legal framework for meaningful civil dialogue

Enlightened trust requires civil society to be effectively heard in policy-making, and that different perspectives are included when drafting policies. The EU should take the lead and implement Article 11 of the TEU and create a legislative framework for civil dialogue in EU policy making, which could be a blueprint for Member States. Such an inter-institutional framework should encompass both sectoral and horizontal policy matters. It should establish a roadmap for the legislative initiatives, clear timelines for accessible open consultations and targeted ones for stakeholders, where different interests are represented and CSOs are clearly differentiated from industry representatives, such as business groups. Such a differentiation and involvement need to be applied also in the stakeholder involvement within the expert groups, with the provision of clear guidelines for selecting members based on their represented interests. When proposing legislation after the consultations, it should be stated which stakeholders were consulted, which proposals were accepted and which ones rejected, and the reasons why, and it should be mandatory to provide justifications for not incorporating recommendations from expert groups into decisions. Ex-ante, interim and ex-post impact assessments, encompassing economic, social, environmental and fundamental rights, should be mandatory. Finally, institutions should designate contact points for civil society actors.

■ #12 Promote deliberative democracy mechanisms at all levels of government

Active citizenship also means that citizens should be engaged in policy-making, also in-between elections. As a complement to the civil dialogue, the EU and Member States should develop, fund, and implement initiatives that integrate deliberative democracy practices into public decision-making processes. They should follow the Council of Europe's recommendations on deliberative democracy, including: establishing a legal framework; providing clarity on the mandate and design of such processes; and ensuring fair representation and accountability. Such citizens' panels should provide input in the early stages of the policy-making process; they should ensure fair representation of the diversity of citizens, including minorities and disadvantaged groups. If the format requires moderators, how they were chosen should be transparent, and they should not bear specific interests in the topic discussed. In presenting the opinions to be debated by the panels, they should encompass the entire public sphere, present diverse political opinions, including a debate between different stakehold-

er organisations, with the possibility of a thorough question time for the audience. The feedback on the citizens panels' input should be reflected in the impact assessment of the legislation, and the panels should be able to follow up on the initiative at the subsequent stages of the decision-making processes. Furthermore, a permanent citizens' assembly could be envisaged, granting it the authority to initiate citizens' advisory panels. As a complement to that, residents should have the power to initiate a deliberative process if a certain support threshold is reached.

Project information

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The EnTrust consortium consists of eight partner teams conducting research and dissemination activities in seven countries (the Czech Republic, Denmark, Greece, Germany, Italy, Poland and Serbia) and at the EU-level. Its work-plan consists of seven work-packages devoted to the systematic analysis and reflection of different aspects of the topic:

1. The Theoretical and Normative Underpinnings of Trust and Distrust
2. Trust and Distrust at the Street-level of Public Policy
3. The Role of Democratic Social Movements in the Formation of Trust and Distrust
4. The Role of the Media in Trust and Distrust Building: Information or Polarisation?
5. Developmental-psychological Insight into Trust and Distrust
6. Appraising Citizens' Trust and Distrust in Governance: Forms, Determinants, Effects and Remedies
7. Civilising Trust and Distrust: Role Models and Recommendations

Further work-packages are committed to the dissemination, exploitation and communication of research, management and ethical issues.

Further information on the EnTrust project is available at: www.entrust-project.eu.

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Social Media



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