Managing a diverse public administration or effectively responding to the needs of a more diverse workforce / OECD survey

Executive Summary

The role of the public service in EU Member States in ensuring the well-being and prosperity of its citizens is crucial. Many countries are still dealing with the legacy of the 2008 crisis, with continuing low growth and persistent unemployment which are undermining citizen's trust in institutions and markets. Inequalities have risen in most countries. Emerging challenges such as large-scale migration and climate change bring new pressures for innovative solutions, and require high-performing public sectors to implement them successfully. The responses of the public sector to a growing number of multi-dimensional challenges will impact the confidence of citizens in public institutions, political decision makers and civil servants as trustworthy deliverers of public policy. This will require a change in the cultures of many European public sectors - going beyond technical efficiency to the creation of public value where the civil service aims to deliver better services to all and strengthen the legitimacy of, and confidence in, public sector institutions in the eyes of the public. It suggests the need to design more diverse and inclusive policies and services, supported by more diverse and inclusive public sector institutions.

Workforce diversity can be a strong contributor to innovation, organisational performance, and trust in public institutions, when this diversity is managed in a way that builds inclusion. This has been understood in the private sector, where innovation and improvement are necessities for survival. For example, it has been shown in various research studies that diversity at management levels helps to build a culture where outside-the-box ideas are encouraged and nurtured. Similarly, when a member of a team shares traits in common with the end-user of a product or service, they can better understand their needs and drive better performance A representative public sector workforce also sends a strong message of inclusion, that public sector institutions are serious about taking all of their citizens' concerns to heart and designing policies and programs that meet their needs. This is increasingly understood in front-line services, such as policing and social work. In **Denmark** for example, efforts are being made to have a composition of employees which reflects the ethnic composition of society in the police administration. Examples become fewer at the higher levels of the civil service where decisions are made and policies designed. As European public sectors look for new ways to solve complex challenges, designing innovative services, restoring trust in public institutions, and implementing policies and practices that promote the diversity and inclusion of their public institutions are becoming increasingly essential. However, the results of this survey suggest that the majority of EU member states have a long way to go in this regard.

The short **survey, "*Managing a diverse public administration for effectively responding to the needs of a more diverse workforce*",** was conducted by the Luxembourgish Ministry of Civil Service and Administrative Reform and the OECD for the EU Public Administration Network over the

summer of 2015. It provides a snapshot of the state of diversity management for more inclusive civil services; intends to help governments reflect on their public human resource management in the context of increasing diversity, and to design the diversity strategy or policy packages that best meet their objectives. It benefits from the response of 26 member states (all except the United Kingdom and Romania). Initial data was presented and discussed in plenary during the European Public Administration Network (EUPAN) Working Group meeting in Luxembourg on the 15th and 16th October 2015 and two interactive workshops were held where participants discussed the issues raised in depth. These sessions helped to frame the issues, to direct the ensuing analysis and to provide some inspiring examples of good practices. Some of these are highlighted in this document, and more of them will be included in the full version of the final report.

I) Background: Diversity and inclusion for a more effective public sector

Europe's populations are becoming more diverse: some facts. This study takes a broad view of diversity, which includes inherent traits such as gender, age, ethnic and/or national background and disabilities. Demographic changes are shifting the balance of the European Union (EU) population's age diversity. For example, the increase in life expectancy, and the decline of fertility rates result in the growth of the population aged 65 and over and the drop in the number of children, young people and those of working age (between 15 and 64). The ageing population and declining workforces faced by most of the EU countries establish important challenges to their national economies, labour markets and social programmes. Furthermore, the composition of the European population is changing due to migration driven in part by the open borders and free movement within the EU, as well as huge numbers of non-Europeans who come to establish themselves for better lives. In fact, Europe's population growth, or stabilization, is increasingly fuelled by immigration. According to EU demographic projections[1], the total European population number should remain stable in 2080 with 500 million people, thanks to the migration trends, while without the migration input, it would sharply decrease to 400 million. Another study predicts that by 2060, around 25% of Europe's population will be of migrant background (will have been born in another country, or have parents born in another country)[2]. Increased diversification of Europe's populations suggest that traditional one-size fits all policy interventions will no longer meet the needs of Europe's populations.

The workforce composition in the public, but also in the private sector, is therefore becoming more diverse. The increased diversity of the labour force is no more apparent than in women's participation rates. In the last generation, labour forces, including the public sector, have undergone profound gender diversification; however this becomes less apparent at the top level of decision making in the private and the public sectors[3], suggesting that organisations are still

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[1] Eurostat, June 2015: http://ec.europa.eu/dgs/home-affairs/e-library/docs/infographics/immigration/migration-in-eu-infographic_en.pdf

[2] European Commission 2010:
http://www.europarl.europa.eu/RegData/docs_autres_institutions/commission_europeenne/sec/2011/0431/COM_SEC(2011)0431(PAR2)_EN.doc

[3] On average, in OECD countries, women represent 57% of the general government workforce and 50% of the central government workforce, but only 27% of top managers (Source: OECD, *Government at a Glance 2013*, 2013, page 121, 123)

struggling to find ways to leverage women's full potential contributions to better governance. Similarly, the ageing of Europe's populations is reflected in its public workforces. In fact, data suggests that most of Europe's public workforces are proportionately older than its general labour force[4]. This presents a double challenge: ensuring that organisations are able to adapt to an increasingly elderly workforce while simultaneously making space for renewal by appealing to the interests and needs of the younger generations. Beyond these two groups, workforce diversity is present in various ways: physical characteristics (age, gender, and disability), cultural characteristics (ethnic or national origin, sexual orientation, lifestyle, family status, religion or belief, language, and political views) and socio-economic characteristics (education, social class, profession, and job-function): all play a role. So, at a macro level, every civil servant belongs to one or several of these categories. But the final result is that, at a micro level, every civil servant has different knowledge, experiences, skills and competencies. Such an institutional wealth must be seen as a resource by governments for innovation.

Workforce diversity can help to strengthen capacity in the face of an ageing workforce and wide-spread retirement. Harnessing workforce diversity can build the capacity of the public sector by bringing a broader set of skills and experiences to bear on societal problems. This is especially important, given that a significant proportion of public employees will retire over a relatively short period. Maintaining the capacity of the public service to deliver public services for all citizens is an important concern. It implies the need to replace retirees and attract competent new employees. Underrepresented groups in the public service may present an under-utilised pool of skills and resources for the public sector. Attracting these skills requires the public service to be an attractive employer, capable of competing with the private sector. This means that EU public administrations have to reflect and meet the needs and issues of every individual of the society by providing each and every employee with the opportunity to develop in ways that reflect their diversity. It also requires innovative tools to transfer the knowledge of older generations to those who will take their place, and to counteract the potential loss of institutional knowledge due to the coming retirement of an important part of the public workforce (*see in this context, table 1 in the Appendix*).

Building an inclusive workforce requires a proactive commitment from EU governments. In order to be an attractive and efficient employer, public sector organizations need to take each employee's different competencies and needs into account. Such evolutions challenge leaders as well as human resource departments to modernize their human resource management policies to use as best as possible the full potential of a changing workforce. The success of diversity management depends greatly on the way it is implemented – recruiting a more diverse workforce is not enough. The success of diversity policies especially depends on its integration into all steps of the human resource management process, from recruitment, selection and training to career development, competency development and retirement, including working patterns and arrangements. Diversity management aims to encourage and empower, engage and retain different and diverse individuals working together. Therefore, building a diverse workforce implies the development of particular skills and competencies (e.g. intercultural skills, leadership, etc.) that

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[4] OECD (2011), *Government at a Glance 2011*, OECD Publishing

were previously not considered as essential for public service work and cohesion. At the same time, this management process needs to be perceived, understood, and accepted by employees as a positive element of their working environment. Each employee needs to be able to adapt her/his career and working patterns to her/his private life, in order to keep a healthy work-life balance and to be fully professionally satisfied. With a strong diversity management in place, each individual should be able to contribute to the success of the public service as a whole and enrich its perspectives in a long-term way for both employees and citizens.

Beyond the human resource strategy adopted by a diversity management, its final long-term goal is to create an inclusive working environment. A civil servant who feels satisfied also feels included in his public organization. Individuals must feel valued for what they are, represent and bring to the workplace in terms of background, knowledge and experience. Inclusion ensures that changing structures and systems make use of the relevant competencies employees have. Thus, introducing a diversity management based on tolerance and inclusiveness can contribute to attract talented applicants from the widest backgrounds possible and retain them. The positive consequences of an inclusive and diverse workplace are to strengthen performance and innovation. A working environment where, for example, new ideas are heard and are possible to implement may allow people to be more motivated and engaged and thus inspired to perform.

II) <u>The Evidence: Key findings from the survey</u>

The survey results present an overall picture of the state of diversity management in EU Member States. By analysing the place of diversity in strategy, targets and objectives, recruitment, accountability, flexible working arrangements and career patterns, adapted knowledge management and policy assessment; the results show the path that EU Member States take towards more inclusive public administrations.

While most EU Member States have laws, strategies and policies focused on gender and people with disabilities, a few take a broader perspective. Most of the EU Member States target the two same elements in their diversity strategy: gender diversity (15)[5] and people with disabilities (14). This survey indicates that some EU governments' diversity strategies are extending beyond these two groups to a wider number of individuals and are thereby adopting a broader view of diversity strategy. These groups include the ageing workforce (9), LGBT (Lesbian, Gay, Bisexual, Transgender) groups (9), employees with migrant background (8) and specific ethnic groups (7).

Sweden goes beyond a diversity group perspective by adopting skills and backgrounds as global targets. In the inclusive approach, educational background and experiences coming from diverse positions, or situations are seen as assets and enable and guarantee the right fit between a job position and civil servant. The approach sets out three steps:
1. Work against discrimination: The responsibility of every government agency since 1980 and 1999.

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[5] The numbers in brackets refer to the number of EU respondent countries having such strategies, objectives or policies

2. Appreciate the importance of a "mixture of background and competence that is of importance for the work, quality and customer orientation" (diversity).

3. Strategic long-term development work to lead and accomplish operations that are characterised by diversity.

The joint approach to accomplish diversity and inclusion includes the following concrete responsibilities:

- Government agencies shall act within the principle of legal security, be efficient, provide good service with high accessibility and be citizen-oriented with an inclusive approach.

- To achieve success in this regard, a strategic competence management is required that, in both the short term and the long term, makes use of different background and competence that are of importance for work, quality and customer orientation (diversity).

- A prerequisite for this is to use clear management and flexible agreements and solutions to create inclusive workplaces with working environments that are free of discrimination.

Source: Swedish Agency for Government Employers, An inclusive approach: a strategy for diversity in the central government sector: http://www.arbetsgivarverket.se/globalassets/avtal-skrifter/skrifter/an-inclusive-approach.pdf

Figure 1: Diversity groups addressed by EU Member States' diversity strategies
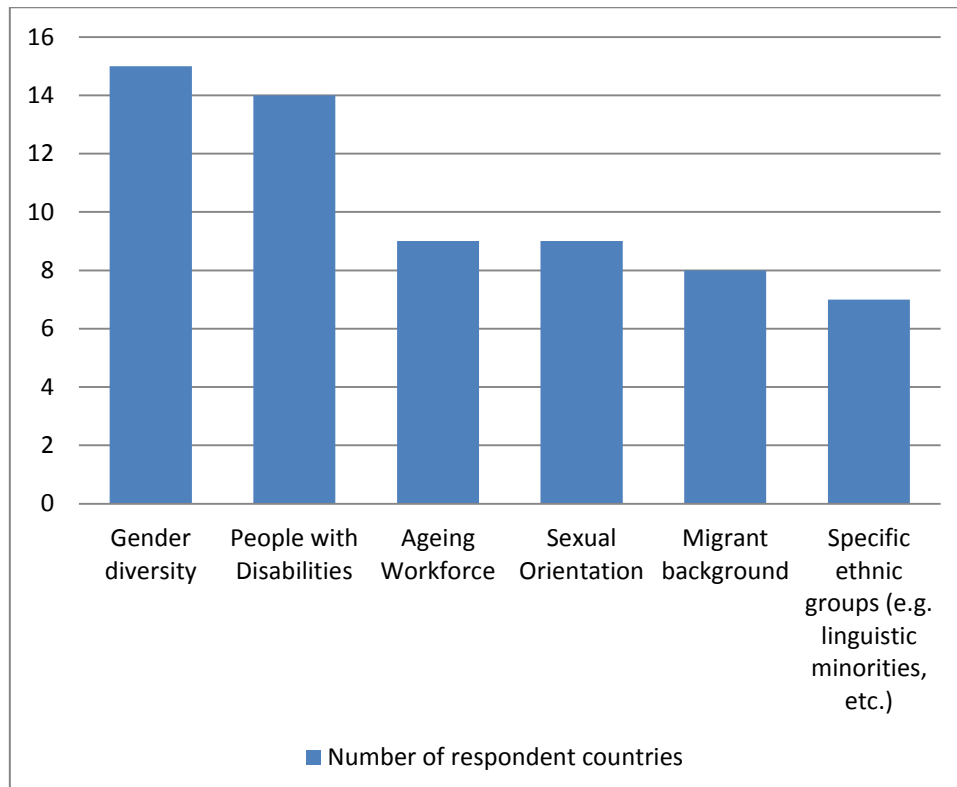
Most diversity strategies aim to provide equal opportunity and protect from discrimination while some take a more active approach to improve policy-making and service delivery. The majority of the EU Member States' diversity strategies are directed towards two main goals that represent two sides of the same coin: provide equal opportunity to employment and advancement for diversity groups (14) and protect against discrimination (14). Such objectives are directly in line with EU legislation promoting equal opportunity. However, a minority of countries aim at other objectives through their diversity strategies such as broadening the talent pool and accessing competencies of underrepresented groups (6), aiming for a civil service which is representative of the population it serves (6), improving policy making (6), improving service delivery (5) or creating and strengthening a value oriented culture (5). While broadening the talent pool or building a value oriented culture represent two features of an inclusive diversity management process, improving both service delivery and policy making or aiming for a representative civil service are intents closer to performance and innovation objectives: they would embody potential results of diversity management. Diversity objectives are being expanded to a more multidimensional view. As Russian dolls, equality would be the first objective of a wider objective (inclusion), which in turn contributes to a wider objective (performance and innovation).

The Netherlands promotes a diverse and complementary workforce in its central public administration human resource strategy for 2020. Diverse on the one hand, because a diverse workforce is the answer to recent labour market developments. Complementary on the other hand, because the public organization's process must be modernized through the recruitment of all the competences of different people available (intercultural skills, leadership skills, etc.). Beyond the guarantee of equal treatment and the fight against discrimination, the strategy aims to use diverse and complementary competences in a more connected network of skills and employees, which would lead to the improvement of both public organizations' performance and quality of the services provided.

As one example, the method Inclusive Redesign of Work Processes' (Dutch abbreviation: IHW-method) aims to create non-complex work for people with limited capabilities. This concerns in particular low-qualified or low-educated people often as a consequence of mental illness, psychological or developmental disorder or a learning disability. The IHW-method is based on an extensive analysis of work processes in organizations and subsequently adjusting these processes in such a way that non-complex jobs can be created for people with a large distance to the labour market. The underlying principle is called 'task differentiation' and allows making optimal use of all the existing work capacity and talent in the labour market.

Source: 'Inclusive Redesign of Work Processes' Centre of Expertise for Inclusive Organizations, Maastricht University (provided by the Dutch delegation)

Figure 2: Objective(s) of diversity strategies adopted by EU Member States
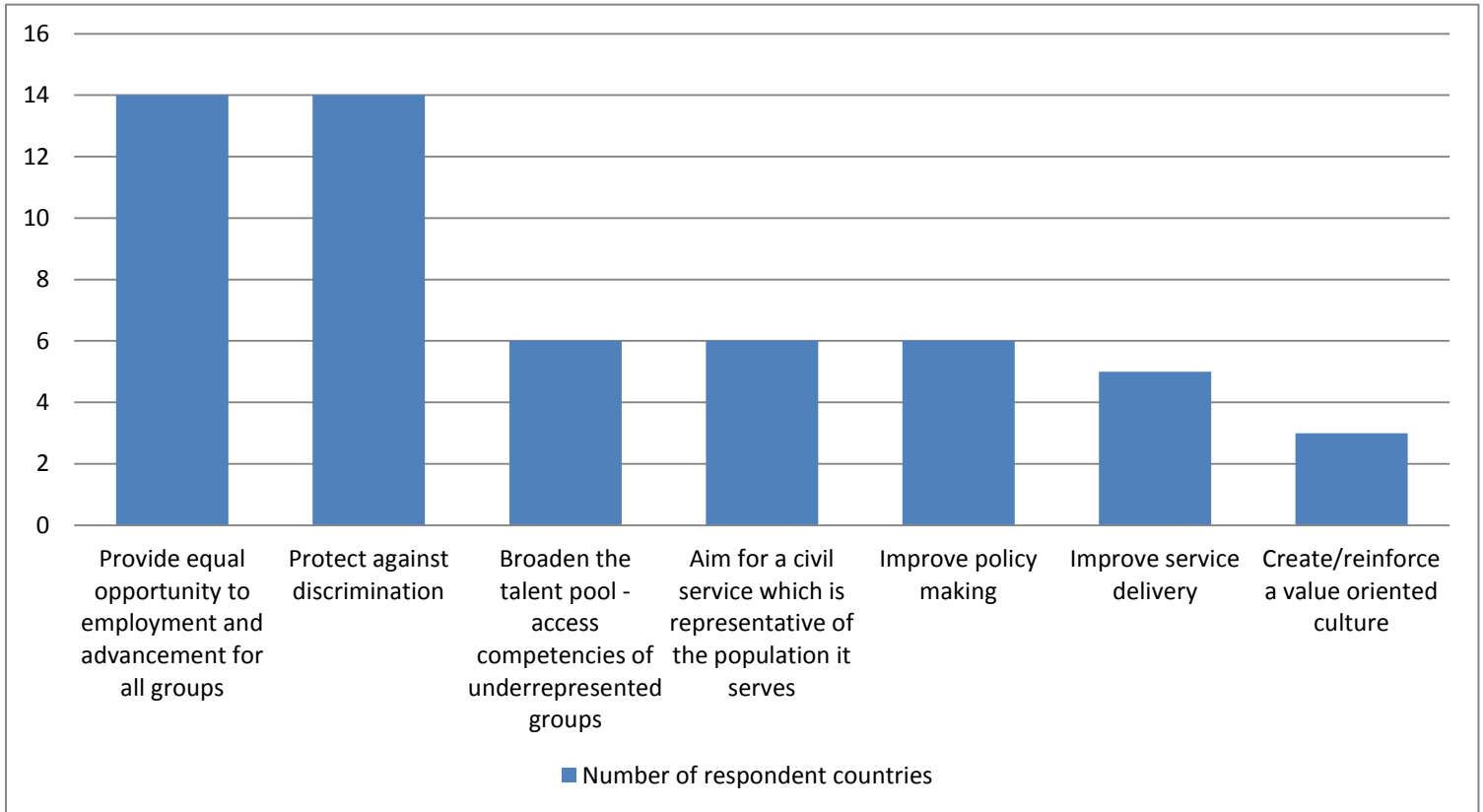
Implementing diversity strategies and tools for diversity management remains a challenge in many EU Member States.

While a majority of countries report having a diversity strategy of some sort, collect some data and report on the diversity of their workforce, systematic implementation of diversity management appears to happen in fewer countries. For example, whereas most of the EU countries have a diversity strategy (19), and/or a diversity charter (13) a smaller number of them have an action plan to implement the strategy (11). Most of these action plans concern gender position equality or quota systems for disabled employees.

Of those countries, even less (8) have specific targets to meet. Of those countries, even fewer hold their senior leaders accountable to achieve these targets. Finally, only **Austria** reports having specific diversity targets linked to senior managers' performance assessment. This suggests that strategies may not be followed through the implementation.

Figure 3: Diversity strategies vs. implementation in EU Member States
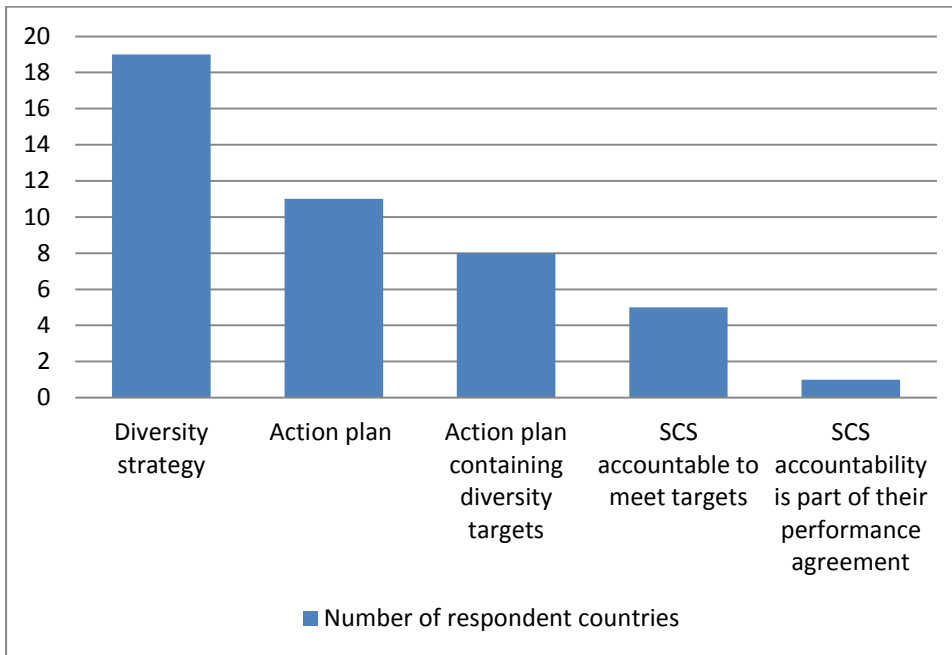
Second, a big majority of the EU countries collect diversity data, usually on gender, age and disability, in order to monitor diversity balance of the workforce (22) or evaluate progress in reaching targets (15). However, only a minority of the countries use it to benchmark against other organisations (11) or other public administrations (9), suggesting a lost opportunity for comparison and cross organisational learning. Furthermore, only a few countries appear to use employee surveys to assess diversity-related issues. In **Portugal**, for example, employee surveys data are analysed, among other thing, by seniority, legal employment relationship, and disability to better understand the viewpoints of these groups.

The survey also asked about the existence of various tools and programmes to manage flexibility and diverse competencies. The majority of the countries have extended several rights to employees which allow for flexible working schemes or arrangements (e.g. right for flexible working hours (16), right for part-time work (21), right for sabbatical leave (19), and right for telework (15)), but most of them did not indicate other current programmes in place to strengthen such rights. However, some countries seem to have an arsenal of measures in place.

In **France**, The "Label Diversité", owned by the state, aims at preventing discrimination and promoting diversity in the public and private sectors. It allows the candidate or labelled organization to assess its HR processes and modify them if necessary. This certification is delivered by AFNOR and helps recognize and know the good recruitment practices and career development valuing diversity in the sphere of work.

The "Label Diversité" in the public service covers all types of employers: companies, administrations, local authorities, public institutions, associations, etc. It evaluates HR devices to prevent or correct the mechanisms of discrimination, by examining all the discriminatory criteria defined by law,

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including age, disability, origin, gender, sexual orientation and identity, trade union or religious opinions, etc.

Each ministry should candidate to obtain the label by the end of 2016 and thus verify that HR management procedures (recruitment, personnel management, promotion,…) are compliant with the non-discrimination obligation. Local authorities are also encouraged to obtain this certification.

The DGAFP and the Delegation general for Employment and Vocational Training (DGEFP) co-chair the commission that develops the label; the other members are representatives of ministries (Interior, Civil Service, Employment, Labour, etc.), employer organizations, trade unions and experts.

The candidatures to the labelling process are on a voluntary approach. The candidates propose the scope of certification, which is subject to an audit and evaluation based on a 6-point procedure (prior diagnosis, definition and implementation of a diversity policy, internal communication, management, external communication and relationships, evaluation and improvement).

If it meets the criteria defined by AFNOR, the candidature is subject to the approval of the commission. The label is granted for four years.

Source: info provided by the French delegation

Finally, while some countries choose to extend the rights for flexible working arrangements (e.g. **Latvia** added to the previously mentioned rights, new rights for job sharing or teleworking), others decided to treat such questions at a ministry level. In **Denmark**, most of the rights and policies mentioned are available by individual agreement between the employee and the employer. It should be noted that it was beyond the scope of this survey to test to what extent these rights are actively used and/or promoted as a means of diversity management.

While the idea of having flexible working arrangements seems to become more common in many countries, having flexible career patterns is still an emerging practice. Only half of the EU countries or less are building and implementing policies related to such process. In fact, while many countries have training and career opportunities for all ages (15) and, to a certain extent, individual development plans (11), horizontal and vertical mobility (9), flexible career path (7), re-entry programmes (6), mid-career programmes (1) or second career opportunities (1) appear to be rare at a central or federal level. Some countries are taking active measures to apply such policies to their public administrations.

Belgium's New Ways of Working initiative is about the creation of a more dynamic workplace where new ways of working have been implemented to promote practices such as desk sharing, home working, increased focus on results and more flexible ways in which teams are structured and work. Our business objective was to become a sexy and sustainable federal public service in order to achieve three main HR challenges: to find talented people, to retain the right people and to make our people happy.

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Five programmes were implemented:

- Culture shift and result orientation with a focus on motivating staff members and promote team spirit, initiative taking and personal development. This programme integrated the concept of team objectives through enhanced accountability of supervisors and optimised evaluation methodology.
- Dynamic office created modular working and living areas. Offices are no longer assigned to people; the agent chooses the working place that is best suited to the assignment he is carrying out (dynamic office). He totally vacates the working station at the end of the day to allow a colleague to use it the following day (clean desk). Special attention to the concepts of welfare and design.
- Digitalising and e-working to provide FPS staff members with ergonomic, reliable, high-performance tools to enable them to work efficiently together and well as concrete solutions to better manage the lifecycle of paper and electronic documents.
- Client orientation to provide quality services and increase accessibility and responsiveness, for the public's greater satisfaction.
- Communication and change management to support all programmes and themes. Better communication facilitates greater clarity, transparency and participation.

Source: OECD Observatory of Public Sector Innovation: https://www.oecd.org/governance/observatory-public-sector-innovation/innovations/page/newwayofworking.htm

Finally, the coming retirement of an important part of the public workforce will lead to an equally important loss of institutional knowledge and experience. Implementing a sustainable knowledge management strategy in their public administration represents therefore another important diversity-related challenge for EU governments. However, building knowledge management is still a challenging process in almost all EU countries. A small number of countries have begun to put in place intergenerational learning (2), knowledge transfer (2), training methods designed to the needs of an ageing workforce (3), or programmes to use knowledge and experience from the retirees (3); however these appear to be exceptions.

Austria has implemented a federal strategy of knowledge management in public administration. A guideline and a toolbox combined with a collection of instruments are in the final stage of development. All these tools aim to support the line manager in her/his task to organize the communication process within the department, the storage and the quality assurance of knowledge and the further training in such a way that knowledge is available and saved for the whole organization and not only by every employee.

Additionally, as part of the Federal Civil Service's staff development programme, a cross-mentoring scheme is available as a tool for the promotion of women's careers. The mentors pass on their experience and know-how, give advice on career planning and facilitate access to professional networks. In the course of a cross mentoring year the mentee and the mentor have to agree upon goals to be attained during their mentoring relationship. Mentees may also have their potential analysed in order to define goals even more precisely. After setting up their goal(s) mentor and

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mentee have to meet at least four times.

To become familiar with their roles as mentor or as mentee participants are invited to take part in accompanying workshops which are followed up by supervision sessions. Within the supporting programme several networking meetings open to all mentors, mentees and personnel developers take place. To engage even more in networking mentees may organise peer groups dealing with different relevant topics.

In order to develop and amend the programme on a regular basis it is evaluated every single year. Since 2005 about 800 mentors and mentees have taken part in the programme.

The programme is coordinated by the Department for Personnel Development and Mobility in DG III - Public Administration and Administrative Innovation within the Federal Chancellery:
Website: https://www.jobboerse.gv.at/aufstieg/crossmentoring/index.html
Film:
https://www.jobboerse.gv.at/aufstieg/crossmentoring/was_ist_mentoring/was_ist_mentoring.html

III) From strategy to implementation: Transforming a diversity strategy into sustained diversity management

Results show that the state of diversity management in most EU Member States is piecemeal at best. A minority of EU countries are, however, taking the lead. These include, in various ways, **Austria, Belgium, France, Sweden and the Netherlands**. As few countries mentioned policies specifically targeting inclusion or innovation (through networking programmes of different target groups to promote inclusion and innovation in this particular survey), these appear to be frontiers not yet prioritised by most EU Member States. The report examines a possible multidimensional process that suggests the following elements to build and implement robust diversity management. These include:

- collecting a wider range of diversity data;
- adopting clear diversity targets;
- building an action plan and implementing it;
- including diversity-related elements in leadership competency frameworks and development;
- providing flexible working arrangements and career patterns to ensure employees' work-life balance and engagement across the life-cycle;
- assessing the efficiency of the diversity policies implemented:
  - at a regular basis to adjust it if needed;
  - through annual reports;
  - through employee surveys to look in-depth at how inclusion is understood, accepted and seen as an opportunity by employees.

EU Member States have much to gain from diversity management including, but not limited to, more innovative solutions to the governance challenges of the day, more effective and efficient service delivery, and more legitimacy and trust in the eyes of an increasingly diverse population. But to capitalise on this potential, investments need to be made at all levels of an organisation, beginning with a commitment from the top, followed by a new way to build workforce management from the bottom up. An increasingly diverse Europe is already a reality. It's time for Europe's public sectors to follow suite.

Table 1: Implementing policies to face the consequences of an ageing workforce

	Corporate health management (Q15)	Implementing policies or programmes to face the consequences of an ageing workforce: Knowledge management measures:				Training methods designed to the needs of an ageing workforce (Q16).
	-	Programmes that aim to transfer specific competencies of older workers to younger employees (Q12)	Programmes to use knowledge and experience of retirees (projects, consultancy, and training expertise) (Q16)	Tools and instruments for intergenerational learning (Q16)	Knowledge transfer (Q16)	-
Austria	●	●	■	●	●	■
Belgium	■	○	■	■	■	■
Bulgaria	○	○	○	○	○	○
Croatia	○	○	○	○	●	○
Cyprus	○	○	●	○	■	●
Czech Republic	○	○	○	○	○	○
Denmark	○	●	■	■	■	■
Estonia	○	●	○	●	○	○
Finland	●	●	■	■	■	■
France	● ■	○	○	○	○	○
Germany	●	○	○	○	○	○
Greece	○	●	○	○	○	○
Hungary	○	○	○	○	○	●
Ireland	●	○	○	○	○	○
Italy	■	○	○	○	○	○
Latvia	■	●	○	■	■	○
Lithuania	○	○	○	○	○	○
Luxembourg	○	○	○	○	○	○
Malta	●	●	●	■	■	○
The	●	●	○	■	■	○

Netherlands	▪					
Poland	●	●	○	▪	▪	○
Portugal	●	○	○	○	○	○
Slovakia	▪	○	○	○	○	○
Slovenia	○	○	○	○	○	●
Spain	○	○	○	○	▪	○
Sweden	●	●	○	▪	▪	○
Total	**15**	**10**	**6**	**10**	**12**	**7**
Centralized	10		2	2	2	3
Decentralized	6		4	8	10	4

- ● Yes, central/federal overarching policy
- ▪ Yes, some line ministries have their own policy
- ○ No

Table 2: Making career patterns more flexible

	Implementing policies or programmes to make career patterns more flexible (Q16) at the central level		Implementing further policies or programmes to make career patterns more flexible (Q16) :					
	Mobility		Mobility					
	Individual development plans	Training and career opportunities for all ages to promote lifelong learning and engagement	Longer and more varied careers with opportunities for horizontal and vertical mobility	Flexible career paths with possibilities to switch for instance between expert and managerial careers	Re-entry programmes	Mid-career programmes for 40+	Second career opportunities	Training methods designed to the needs of an ageing workforce
Austria	○	●	▪	▪	●	○	○	▪
Belgium	●		●					
	▪	●	▪	▪	▪	▪	▪	▪
Bulgaria	○	○	○	○	○	○	○	○
Croatia	○	●	●	○	○	○	○	○
Cyprus	○	●	●	○	○	○	○	●
Czech Republic	○	○	○	○	○	○	○	○
Denmark	▪	▪	▪	▪	▪	▪	▪	▪
Estonia	▪	●	○	○	○	○	○	○
Finland	●	●	●	●	○	▪	○	▪
France	●	●	●	●				
	▪	▪	▪	▪	▪	▪	○	○
Germany	○	○	○	○	○	○	○	○

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Greece	○	○	○	○	○	○	○	○
Hungary	●	●	○	○	○	○	○	●
Ireland	○	●	○	●	●	○	○	○
Italy	○	▪	○	○	○	○	○	○
Latvia	●	○	○	○	○	○	○	○
Lithuania	○	○	○	○	▪	○	○	○
Luxembourg	●	●	●	○	●	○	○	○
Malta	○	●	●	●	●	○	●	○
The Netherlands	● ▪	●	○	●	●	●	○	○
Poland	●	●	○	○	○	○	○	○
Portugal	●	○	○	●	○	○	○	○
Slovakia	○	●	●	○	○	○	○	○
Slovenia	●	○	●	●	○	○	○	●
Spain	○	●	○	○	●	○	○	○
Sweden	●	▪	▪	▪	○	○	○	○
Total	**13**	**18**	**12**	**11**	**10**	**5**	**3**	**7**
Centralized	11	15	9	7	6	1	1	3
Decentralized	5	4	5	5	4	4	2	4

- ● Yes, central/federal overarching policy
- ▪ Yes, some line ministries have their own policy
- ○ No

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