A Conceptual Framework for Understanding and Measuring The Transparency of Public Policy[1]

Miroslav Beblavý[2] – Emília Sičáková-Beblavá[3] – Barbara Bačová[4]
Institute of Public Policy, Faculty of Social and Economic Sciences, Comenius University, Bratislava

A Conceptual Framework for Understanding and Measuring The Transparency of Public Policy. The covid-19 pandemic has led to government action of a scope unprecedented in peacetime, including in the area of public management, administration, and public policy-making. Government approaches in the covid-19 times have thus become a relevant research issue. However, despite the extensive attention already paid to the concept of transparency in the global public and political discourse as well academic research, we lack a clear framework for measuring the transparency of processes through which public policies, including laws and regulations, are adopted. This paper aims to remedy that, and two innovations are presented. The first one brings together various benefits of the transparency of public administration and public policy processes into a single framework, while the second one presents a conceptual toolbox for measuring the transparency of public policy. The paper illustrates use of the framework through an illustrative example of the passage of the COVID-19 legislation in Slovakia at the beginning of the pandemic, demonstrating that the overall transparency of the policy process in this case was extremely low.

Introduction

The concept of transparency has been, during the last three decades, a subject of global public and political discourse but also of extensive research. Every day, we can read that X is not transparent or that the transparency of Y is high. Searching for "transparency" in Google brings up a staggering number of 3,610,000,000 hits, ten times as much as the number returned for similar terms such as "governance" (251,000,000), accountability (233,000,000) or "corruption" (337,000,000), reflecting the ubiquity of the term in contemporary discourse. As Krastev writes: "Transparency is the new political religion shared by a majority of civic activists and an increasing number of governments… The movement aims to build a reverse panopticon where it is not the

---

[2] Correspondence: Doc. Ing. Miroslav Beblavý, PhD., Sciences Po Paríž a ESPRI Bratislava, s.r.o., Koperníkova 47', 82104 Bratislava, E-mail: Miroslav.Beblavy@sciencespo.fr

[3] Correspondence: prof. Ing. Emília Sičáková-Beblavá, PhD., Institute of Public Policy, Faculty of Social and Economic Sciences, Comenius University, Mlynské luhy 4, 821 05, Bratislava, E-mail: emilia.beblava@fses.uniba.sk

[4] Correspondence: Barbara Bačová, ESPRI, Koperníkova 47, 82104 Bratislava. E-mail: bb590@cam.ac.uk

government that will monitor society but society that will monitor those in power." (Krastev 2020: p. 1)

The covid-19 pandemic has led to government action of a scope unprecedented in peacetime, ranging from large-scale economic intervention to limitations of civil liberties. In addition to government actions, researchers also review big thematic challenges related to covid-19 and how public management and administration research can help us better understand and address them (O'Flynn 2020).

However, despite all the attention, we lack a clear framework for measuring the transparency of processes through which public policies, including laws and regulations, are adopted. This paper aims to remedy that. It starts with a framework for understanding and measuring the transparency of public policy processes. It reviews the literature on how the transparency of public policy processes is defined, what its benefits are, and how it is measured. Then two innovations are presented. The first one brings together various benefits of the transparency of public administration and public policy processes into a single framework, while the second one presents a conceptual toolbox for measuring the transparency of public policy. This toolbox is also illustrated with examples from the Slovak experience with covid-era legislation.

Defining the transparency of public policy processes

The first section reviews available literature defining transparency, particularly the transparency of public policy processes. According to the Online Etymology Dictionary, "transparent" as an adjective dates from the early 15th century and is derived from Medieval Latin transparentem, which is the present participle of transparere, meaning "show light through". By the 1590s, the word "transparency" as the "condition of being transparent" is recorded with regard to pictures and prints. However, its widespread dissemination in the current context dates to the 1980s and early 1990s, when it began to be used in international relations, both academically and as a part of the discourse of supranational organizations (Ball 2009).

General definitions of transparency emphasize "the quality of being done in an open way without secrets" (Cambridge Dictionary), being "free from pretense or deceit," "easily detected or seen through," "readily understood," or "characterized by visibility or accessibility of information especially concerning business practices" (Merriam-Webster Dictionary). A broad and general definition of transparency is provided by Davis, who defines it as "lifting the veil of secrecy" (Davis 1998, p. 121).

Meijer (2013, p. 430) stresses the following three types of transparency, all of which are relevant for the framework presented here:

- Transparency as an institutional relation - one of the actors is the object of transparency and she can be monitored. Other actors are the subjects and they can monitor the first one. Their relations can be analyzed from the perspective of rules, powers, interactions, etc. Monitoring actors could be citizens, media, as well as various interest groups.
- Transparency as an information exchange - within this approach, the important aspect is making information available to the monitoring actor and transparency is about the representation of reality, e.g. decisions and activities of the actor and the relevant circumstances.
- Transparency of process and performance - what government institutions achieve in terms of inputs, outputs and outcomes and how they achieve these results in terms of transformation processes.

As for government transparency, Grimmelikhuiljsen, Porumbescu, and Hong (2013, p. 576) distinguish the transparency of decision-making processes, transparency of policy content and transparency of policy outcomes and effects. Due to the nature of the paper, it focuses on the former, where several aspects are addressed, for example, the degree of openness and steps taken to reach decision and rationale behind the decision, transparency of policy content/policy transparency that refers to information disclosed by the government about the policy itself: what the adopted measures are, how they are supposed to solve the policy problem, implementation issues, implications for citizens. Vishwanath and Kaufmann (1999) add to government transparency a condition of dynamism by defining it as follows - "the increased flow of timely and reliable economic, social and political information, which is accessible to all relevant stakeholders" (Vishwanath and Kaufmann, 1999, p. 3).

In addition to conceptualizing *transparency* in the public sector/administration in general, the research also looks at specific types of transparency, including the topic of this paper - the transparency of the public policy cycle (PPC). There are different academic views, models and arguments already developed as to which actors, what tools and in which phase of PPC should be involved and it has its implications for the transparency of PPC. Here we distinguish between the traditional and integrative views.

Traditional school is based on a rational-technical view of policy-making. It relies on expert-driven processes and formal policy analysis that assume that policy-making can optimally solve policy problems (Brunswicker, Priego and Almirall, 2019).

Integrative views (Brunswicker, Priego and Almirall, 2019), more relevant today and reflected in this paper, stem from technological changes that partially erased boundaries between governments and the public (Linders, 2012, p. 6). Digital tools are used to provide access to information and it enables participatory policy-making and digitally-enabled transparency (Janssen and Helbig, 2018). "In such participatory policy making, digitally-enabled transparency…. describes a digitally-mediated institutional relationship between policy makers and citizens during the policy-making cycle, in which those actors can observe each others' behaviors or/and their outcomes" (Brunswicker, Priego and Almirall, 2019, p. 571). Within this approach, the government is perceived as a platform that works with social media, the internet, big data and data analytics. Citizens become active producers and users of policy-related information and it allows policy-makers to collect, aggregate, and interpret information related to the citizens' behavior within the policy cycle (Janssen and Helbig, 2018). An integrative view thus reflects the change in the object-subject relationship from a focus on the observability of choices inside the government to insights related to citizens' choices and behaviors connected to policy-makers' actions and goals (Brunswicker, Priego and Almirall, 2019).

Provision of information within PPC is usually based on legislation that mandates proactive publication of relevant information or its provision on demand. The legislation can range from the rules of procedure in the legislature through legislation governing the relationship between the government and the press all the way to freedom of information acts. As for the channels of information provision, the public sector currently provides information mainly through websites and other internet channels (Eschenfelder, 2004). However, the relations between e-government and governmental transparency can vary (Relly and Sabharwal, 2009). Before the channels for access to information have been changed through e-government (Otenyo and Lind, 2004), democratic polity and free press were the main institutional actors playing a key role in access to and dissemination of information (Besley and Burgess, 2002). Digital technologies changed the status quo and enabled governments to operate platforms (Linders, 2012). There, public policy-makers can "act as orchestrators that iteratively design, test and evaluate a greater variety of policy solutions" (Brunswicker, Priego and Almirall, 2019, p. 570). Policy-makers can also share their insights on citizens' behavior with the public and this way form indirect levers for policy-making (Janssen and Helbig, 2018; Linders, 2012). According to this view, transparency is an integrated part of policy-making and forms how citizens adapt and react to information in their local environment.

Rationale for and benefits of transparency in policy-making

Transparency in policy-making in its early form was seen as "a constitutional instrument for empowering the people as opposed to entrusting a monarch with absolute sovereignty" (Weber and Kaufman, 2010, p. 782) to limit his influence in the course of justice. Historically thus transparency stood for publication of the law in force (Locke 1690). Thus those with rights and those with obligations must both have access to the law to make it efficient (Weber and Kaufman, 2010). Transparency as the publication of the law in force has been broadened in recent decades also to policy-making and policy implementation.

Academic literature in political science comes with two theoretical approaches that explore transparency as a means to increase public accountability that are both incorporated into the framework presented here (Garrido-Rodríguez and Zafra-Gomez, 2017):

- Agency theory that is based on the differences of interests between actors. Within this theoretical approach public actors are forced to demonstrate their actions to external users of information
- Legitimacy theory states that the disclosure of information to citizens is an important factor influencing the legitimacy of the actions conducted by the public entities (Archel et al., 2009).

Legitimacy theory is also concerned with civic participation. According to Peňa-Lopez (2001) and Surowiecki (2004), it enables policy-makers to better understand policy problems and to receive insights into policy-making. Thus it enables public sector organizations to become learning organizations. At the same time it forms an environment for more effective implementation as citizens are informed about policies they helped to develop. The trust between the citizens and government as well as the legitimacy of public governance is also built by government openness (Peňa-Lopez, 2001). Within this context transparency is explored in relation to confidence. For Weber and Kaufmann (2010, p. 783) transparency is a precondition for building confidence in certain expected behavior of citizens and organizations. Expectations are based on existing rules, traditions and moral rules. However, according to Moon (2020), the relationship between transparency and trust is not straightforward, especially in times of crisis. Research also suggests that there can be limits to the theory of procedural justice and related ideas of a positive relationship between transparency and perceived legitimacy in certain situations (MacCoun, 2006). An example is when people's outcome preferences represent strong moral convictions (Bauman and Skitka, 2009). This is related to taboo trade-

offs that involve life and death issues and their economic calculations (Fiske and Tetlock, 1997). If people perceive political decisions as trade-offs between human life or well-being and money, increased transparency that makes these choices more salient may trigger negative feelings toward decisions and decision-makers (Tetlock et al., 2000). Thus research indicates that transparency effects are related to the type of policy area.

Transparency is not just a concern of political scientists, but also of economists and its relationship to the functioning of the market (Akerlof, 1970). In a plural society each stage of PPC - from agenda-setting to the implementation and evaluation of policies – is influenced by various interest groups and the lack of information within PPC can lead to moral hazard between those in power and citizens (Persson and Tabellini, 2016). Access and dissemination of information thus creates the potential for individual as well as organizational participation and partially solves the moral hazard problem. According to Kaufmann and Bellver (2005), the broader the dissemination of information the better the allocation of resources to decrease political failures and to better cover the preferences of the citizens.

However, equal access to information, for instance through mediated transparency conducted by web pages, does not necessarily mean that access to information is exercised by all stakeholders. In this context Olson (2009) explores collective action failure. He suggests that depending on the size of the group, individuals that attempt to provide public goods may face challenges to do so efficiently as they have incentives to free-ride. Research thus indicates that despite limiting information asymmetry and increasing formal access to information in policy-making, not all stakeholders participate in PPC. There may be various reasons behind this state of affairs, e.g. low level of information clarity, time-demanding effort to get and work with the relevant information as well as cognitive complexity and institutional complexity of policy-making. Margetts (2011) stresses that digital, technologically aided transparency is usually available only to those with internet access and skills. This might partially explain the existence of information brokers (e.g. media, NGOs, trade unions, social media actors and other organized interest groups) who monitor, interpret and comment on the information provided by the government. Those actors, however, may base their interpretation of provided information on biased beliefs (De Chantal et al., 2020). On the other hand, Dudley and Wegrich (2015) suggest that transparency in the regulatory process has the potential to increase its efficiency and limit the tendencies of politicians and public officials to narrowly focus on policy problems and therefore limit capturing of policy-making by particular interest groups.

The game theory perspective, employed with regard to PPC transparency, supports this more nuanced approach. Besley and Burgess (2002) and Snyder

and Ting (2005) show clear benefits, basing their models on assumptions that the public holds unbiased beliefs concerning the effects of policies and policy-makers and the public are equally well-positioned to judge the appropriateness of policies (Fox, 2007). These assumptions, however, do not always apply (Arnold, 1990; Carey, 2004) due to the cognitive complexity of PPC, strategic complexity as well as institutional complexity of policy-making that have already been mentioned above. Empirical research also challenges the argument of the rational and unbiased public (Caplan, 2002; Shefrrin, 1996; Kahneman, Knetsch and Thaler 1991). Fox (2007) suggests that when public's beliefs are systematically biased, making the policy process more transparent has drawbacks, as those "politicians who would choose the policy that maximizes the public's welfare behind closed doors have electoral incentives to cater to the public's misperceptions when policy is made in the open". (Fox, 2007, p. 24) However, Prat (2005) suggests that this situation may create incentives for politicians to persuade voters that they are unbiased and competent by providing more transparency. When it is the lack of information that causes noise, overload and bounded rationality (Argyris 1991), its provision can decrease information asymmetry in policy-making, increase the trust and compliance of the adopted policies.

The recent discourse thus suggests that transparency has the potential to transform the whole cycle of policy-making, from problem definition to evaluation of policy solutions (Matheus, Janssen and Maheshwari, 2018) that have the potential to increase the effectiveness of policy-making (Shafir, 2013).

Based on the existing literature, one can posit five types of potential benefits brought about by greater transparency and accessibility of public policy processes in a framework that brings together political, economic and sociological perspectives:

1. ***Improving accountability of public institutions through their better monitoring.*** This is a widely understood benefit conceptually underpinned by the principal-agent theory. If the electorate is defined as the principal and public institutions are seen as their agents, then the availability of more information about individual public policies to the electorate should enable better monitoring of public institutions by the electorate, leading to improved accountability.

2. ***Equalizing access to power and creating a more level playing field in the society as a whole.*** Greater transparency of the policy process implies lower costs of accessing *information* about the policies themselves, as well as their rationale and impacts for members of the public. *Ceteris paribus*, this enables less powerful or organized societal groups to find out what is being proposed and thus creates a more level

playing field. This can ameliorate the problem first identified by Mancur Olson (2009) - the logic of collective action - and lead to policies closer to the preferences of the median voter. It should be noted that this does NOT mean complete equalization due to existing differences in organizational, cognitive and financial resources, just an improvement compared to the situation with less transparency.

3. ***Improving compliance with policies and regulations.*** There are two reasons why more transparency during the policy cycle should improve compliance with policies and regulations by individual actors. Greater transparency makes it more likely that individuals are aware of their rights and obligations in the first place. Secondly, more transparency and resulting public debate increase the *ceteris paribus* legitimacy of a given policy. Of course, this is only the case if increased transparency does not lead to more controversy, which can undermine legitimacy (the *ceteris paribus* condition).

4. ***Improving the decision-making process by creating a more level playing field between policy-makers themselves.*** It is often assumed (explicitly or implicitly) that policy-makers hold all the relevant information and decide how much of it to make available to other actors. However, this is not true for two reasons. First of all, let's suppose that all relevant information is held by a policy-maker closest to the design of the policy itself (e.g. a senior civil servant or a minister). Unconstrained, this policy-maker is likely to use the information strategically and release only that part to other policy-makers that is favorable to her objectives. Greater mandatory transparency is therefore useful not just for the public, but also to everyone else involved in policy-making processes (other ministers and civil servants, members of parliaments, judges…) Secondly, due to financial and temporal costs of information, even the policy-maker responsible for a design of a given policy would, on her own, likely collect a smaller volume of information on policy's likely impact than is mandated by rules, as she bears the costs of this, but does not necessarily consider it beneficial (after all, she is generally ex-ante in favor of a certain policy option).

5. ***Decreasing policy-makers' bias and correcting information asymmetries through feedback.*** This benefit is predicated on the assumption that information available to policy-makers can be incomplete or biased, either because some critically important information is not captured in official sources (e.g. statistics) or because policy-makers do not consult them during policy design. Greater transparency during the policy cycle enables broader

participation and feedback loop, thus helping to remove biases and information asymmetry.

It should be noted that these benefits are not automatic, but only potential. They are conditional not only on the precise form of individual transparency measures, but also on how transparency enters two reaction functions: the reaction function of the society and its individual actors to the information that is accessible; and the reaction function of policy-makers to the information that is accessible and to the feedback provided by societal actors (by feedback, we mean not just substantive information on policies themselves, but also information on political costs or benefits embedded, for example, in protests).

Figure 1: **Benefits of public policy transparency**
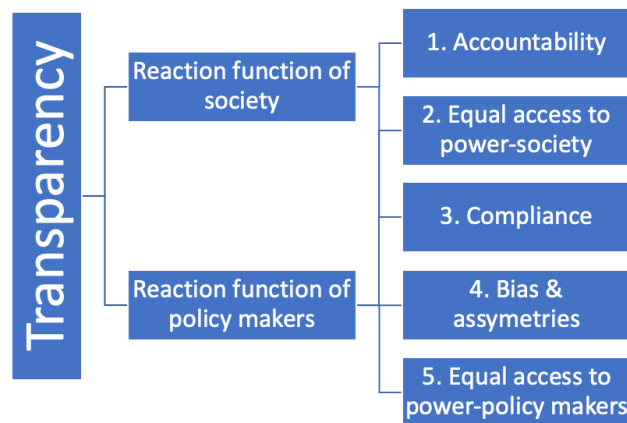
Source: authors

Some methodological considerations in designing a framework for measuring the transparency of public policy

Authors of existing transparency indices have taken a variety of approaches – on both the sources of their data, as well as the focus of their indices – when designing frameworks for measuring the transparency of public policy. Therefore, instead of assessing the merits and limitations of individual frameworks, this section takes the holistic approach of exploring general relevant methodological considerations when designing a framework for measuring the transparency of public policy. Subsequently, it argues that such a framework should address the issue of falsifiability and replicability.

In Popper's (1959) initial proposal of the concept, he described the condition of falsifiability the following way: "Statements, or systems of statements,

convey information about the empirical world only if they are capable of clashing with experience; or, more precisely, only if they can be systematically tested, that is to say, if they can be subjected... to tests which might result in their refutation" (Popper 1959: p. 313-314). Since its introduction, the concept has become part of a standard of evaluation of scientific assertions, hypotheses, and theories – making only such claims that can (at least theoretically) be disproved qualify as scientific ones.

In the context of measuring the transparency of public policy, however, most indicators based on subjective information have not been truly falsifiable. Therefore, indices such as the World Economic Forum, World Bank's World Governance Indicators, or Global Integrity Index are all based on surveying a set of experts. For instance, World Economic Forum's index 'Transparency of government policymaking' (that was, until 2018, a part of The Global Competitiveness Report) uses the Executive Opinion Survey to capture "the opinions of business leaders around the world on a broad range of topics for which statistics are unreliable, outdated, or nonexistent for many countries" (Schwab, 2018, p.333). To inquire into the business leaders' assessment of transparency in countries in which they operate more specifically, they ask the following question: "In your country, how easy is it for companies to obtain information about changes in government policies and regulations affecting their activities?" – where 1 is extremely difficult and 7 is extremely easy. (ibid., p. 342).

Coming back to the condition of falsifiability, these kinds of indices –- based on subjective evaluations of experts – do not allow us to demonstrate that they could be false. For example, one would not be able to show that the World Economic Forum does not capture the actual transparency of government policy-making. It is impossible because such a piece of data (the transparency of a totality of government policy-making) does not exist. Instead, the index employs circular logic – it captures a subjective view of a set of experts, which it then aggregates into the index and thus constructs the data instead of measuring or capturing them. Likewise, in several cases, the indices are not even based on data collected, but are metaindices that aggregate data from other sources in regards to transparency, usually themselves survey-based (e.g. Corruption Perception Index by Transparency International).

The second issue – replicability – follows from the first one. Consulting Popper (1959, p. 45) again for a description of the concept, he remarks that we do not consider our observations scientific before we repeat and test them: "Only by such repetitions can we convince ourselves that we are not dealing with a mere isolated 'coincidence,' but with events which, on account of their regularity and reproducibility, are in principle intersubjectively testable." While there are various types of replication, they usually involve a different group of

researchers repeating the study with the same methodology. Although this has become a standard aspect of the scientific method, it has arguably been less commonly seen in social sciences (Tsang and Kwan, 1999).

However, given that essentially none of these organizations publish a rigorous methodology for the selection of experts they contact to fill in their surveys, this has made it impossible to fulfill the condition of replicability and thus ensure the soundness of the scientific method. Consequently, we do not deny the potential utility of subjective methodology based on expert surveys and understand that it is sometimes because of the lack of reliable data and/or resource constraints that they are chosen as the preferred option. However, a falsifiable and replicable measurement of the transparency of public policy processes necessitates a different approach. Such an approach needs to be based on an objective measurement of transparency. It requires:

- a specific, fact-based approach to measurement that can be replicated, as well as a specific unit of measurement
- a proper scope of transparency in terms of agency
- comprehensive coverage of the policy cycle.

Specific, fact-based approach to measurement that can be replicated
To demonstrate what is meant by this criterion, we turn to a number of helpful precedents. One of them is the Index of Central Bank Transparency as developed by Eijffinger and Geraats (2006), the focus of which goes beyond policy-making. Focusing on the actual practices of central banks as opposed to the analysis of their formal disclosure requirements, the framework, "assesses the disclosure of explicit information based on a theory-consistent framework" (p. 15), where "each question in the index pertains to a distinct item and thereby avoids direct overlap" (p. 15). Moreover, while the authors concede that sources like voting records or minutes could paint a more complete picture about the future policy actions and forecasts, "such inference is indirect and hard to verify, whereas (their) index directly addresses each item based on specific criteria" (p. 15). Consequently, they develop a framework comprising five aspects of transparency: political, economic, procedural, policy, and operational transparency. A similar example that follows their theoretical set-up would, for instance, be the Index of Transparency of Banking Supervisors created by Liedorp, et al. (2013) that also considers the transparency of banking supervisors along the theoretical lines of the five aspects of transparency proposed by Eijffinger and Geraats.

Another noteworthy example would be the Local and Regional Governments Transparency and Openness Index produced by Transparency International Slovakia. The version of the index examining the performance of

cities that was last created in 2018 evaluated 105 indicators and looked at about 11 areas of local and regional governments operation, such as the availability of information on web pages, public procurement transparency, personnel policy, etc. The subsequent score awarded was based on publicly available, easily measurable, and objectively verifiable data.

Therefore, a clearly laid out, objective approach to measurement allows for the collected data to be falsifiable and replicable.

Specific unit of measurement

In the existing frameworks for measuring the transparency of public policy, we often encounter a conceptual vagueness stemming from terms like "policy-making," "government," or "public integrity" being used. Yet, to be able to create a falsifiable and replicable measure, we need to operate with a specific, measurable unit. In our case, we need to evaluate the transparency of the design and approval of a specific legal or policy document and score it in a replicable manner.

Although not directly from the realm of public policy, a useful precedent in this case is the Czech Public Procurement Index. Using a web robot to collect data from the Czech Public e-Procurement Information System, Chvalkovská and Skuhrovec (2010) created an index that rates contracting authorities, measuring "distance between the existing PP practices of contracting authorities and identified best practices in PP" (p. 5). Institutions' standing according to the TI is thus evaluated with a single numerical value between 0 and 100, where 100 refers to the best practice. Moreover, the composite index is created "as a weighted sum of ten various transparency indicators, computed separately for each contracting authority," with aggregate indices being created for institutions.

Subsequently, we propose that a specific, well-defined unit of measurement improves the scientific soundness of the measuring of transparency.

Proper scope of transparency in terms of agency

While transparency as a concept can take a range of different meanings, here we argue that while mere availability of information is a valuable aspect of it (as, for instance, see in the Government Transparency Index or the Index of Central Bank Transparency), it is too limited.

This conceptualization of transparency, which emphasizes that transparency means sharing information about government with the public, has been termed 'passive transparency' by Schauer (2011) and 'old transparency' by Oliver (2004). As Frank (2015) describes in his article, it promotes the view that "Government should not concern itself with who uses that information or for what purpose. It is not required, or appropriate, for the government to promote

that information or interpret the information. The metric of passive transparency is the amount of information that is made available – more is better" (Frank, 2015).

Frank contrasts this with 'active transparency' that he says refers to communication with a targeted audience. As an example he quotes "targeted transparency programmes such as requiring restaurants to display stickers with the results of food hygiene inspections," (ibid.) as it includes "defining a problem to be addressed, identifying an audience to be informed, selecting information that is to be communicated and putting in place the socio-technical systems to communicate successfully and allow the audience to act on the information" (ibid.).

However, in even closer proximity of transparency to the citizens is the concept of 'participatory transparency'. Dreyer and Ziebarth (2014) describe that while the "notion of participatory transparency usually refers to the transparency of participatory procedures," (p. 533) in this case they "focus on improved transparency through participatory activities" (p. 534). The concept has since been applied, for instance, by Muthomi and Thurmaier (2021) who have looked at the experiences of "citizens who participated in planning and budgeting sessions in four Kenyan counties" (p. 520).

This shows the range of understandings of transparency – from mere availability of information (either on request or proactively) to the ability to use that information to respond and shape public policy, with more inclusive notions of agency that stress active citizen participation capturing better the impact of transparency. For instance, an index that took the broader approach would be the UN E-Government Survey that assesses "the e-government readiness and extent of e-participation of the UN Member States according to a quantitative composite index of e-readiness based on website assessment, telecommunication infrastructure, and human resource endowment". The index's broader concept of agency is evidenced by the fact that its authors operate with notions like "e-information sharing," "e-consultation," but also "e-decision making" (UN, 2022).

Comprehensive coverage of the policy cycle

Comprehensive coverage does not imply coverage of a broad spectrum, but of the whole policy cycle. To measure the transparency of policy even in a narrow area, the indices need to remain broad in the sense of covering the entirety of the policy cycle and be inclusive of the executive, legislature, courts, and other interpreters. The Open Budget Index (International Budget Partnership, 2020) fulfills this criterion - it evaluates "the three components of a budget accountability system: public availability of budget information; opportunities for the public to participate in the budget process; and the role of formal

oversight institutions, including the legislature and the national audit office". (p. 74) In the majority of cases they focus on the institutions' practice rather than what is required by law. Crucially, they take into account whether information is timely released to the public throughout the entire budget process, which means that the questions in their index focus on all of the following documents: pre-budget statement, executive's budget proposal, enacted budget, citizens budget, in-year reports, mid-year review, year-end report, as well as an audit report. Such a broad focus makes the index holistic enough to include all stages of the policy cycle.

Comprehensive framework for measuring the transparency of public policy processes

As the previous text shows, there is no available comprehensive conceptual framework for measuring the transparency of public policy processes. Each index has its own ad hoc and inductive approach derived from the specific research agenda it is pursuing. The framework presented in this paper can be the basis for a truly comprehensive approach. Its objective is to embed the measurement in a clear conceptual approach based on two dimensions of the transparency of public policy. For reasons of economy and cost, it will become clear that any actual measurement has to make choices and trade-offs within each dimension and its individual parts, but it is preferable those choices are made openly and explained by creators of any index. In the absence of such a framework, indices are more likely to be based on easily available information or biases of the researcher.

The framework proposes to use, as a unit of measurement, the transparency of a specific policy document, law or regulation. This allows measurement of *de facto* transparency, not of *de iure* transparency and minimizes bias towards the "official" story. In other words, one should NOT generically assess official rules, but analyze how they were applied in specific cases.

Such individual scores can be used to assess the transparency of policy-making with regard to a specific document or can be aggregated to provide transparency scores for all policies in a certain area, during a given period or can be aggregated in any other meaningful way. Such scores can be derived by analyzing all relevant policies or by drawing a sample if the total number is impractically large. The follow-up paper will use such measurement to compare the transparency of public policy processes during the covid pandemic with the situation in the previous year.

The transparency of public policy during the policy cycle should cover two dimensions of policy-making:

- stages of the policy cycle
- elements of policy-making.

Figure 2: **Transparency of public policy - two dimensions of measurement**
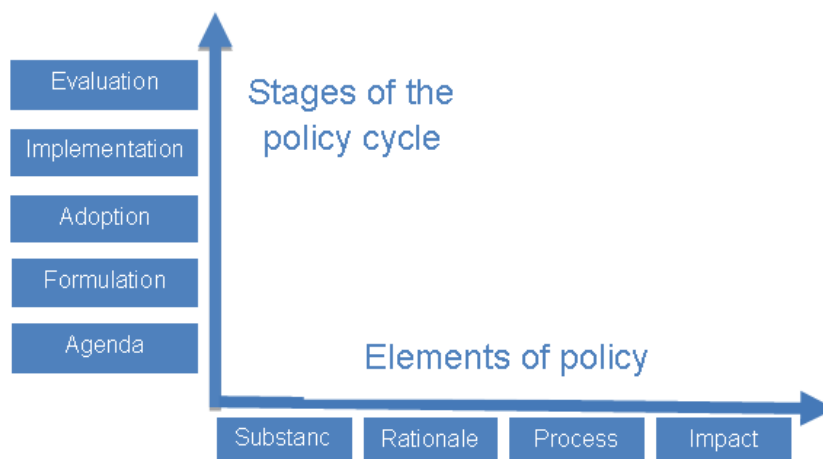
Source: authors

The framework should cover all **stages** of the policy cycle. There are various conceptualizations of the policy cycle, but this paper uses a simple, robust and probably most frequently used approach that divides the cycle into five distinct stages:

- Agenda-setting
- Formulation
- Adoption
- Implementation
- Evaluation.

The framework should also cover major **elements** of policy-making that a government should be transparent about. It proposes a parsimonious but comprehensive list of four areas that are most important in terms of potential benefits as outlined above:

- Substance
- Rationale
- Process
- Impact.

Next, the paper presents a detailed explanation of each element and stage, using illustrative examples from the policy-making activities during the COVID pandemic in Slovakia.

The first element is **substance -** concerned with what is the policy, law or regulation? The reason for its inclusion is self-evident as informing about what is actually being proposed or enacted is the very basis of transparency. It covers contents of the actual document that is the object of public processes under examination as well as the content of any other documents of substantive nature that follow from the primary document (implementation plans, secondary legislation, court decisions). The transparency of substance covers the availability of information on all these elements and, as all other elements, should be scored for each stage (if relevant):

- *Agenda-setting* - the relevant questions are: Has there been an announcement that something will be done about a certain topic? If yes, does the announcement specify what policies, laws and what will be changed and how? Is there an opportunity for external actors to provide input prior to the formulation stage?

  Within the COVID pandemic in Slovakia The Act on Special Measures related to Spreading of COVID-19 ("*The COVID-19 Act*") was developed and submitted for government session in March 2020. The given Act was developed as the reaction to unexpected COVID-19 pandemia and introduced measures in the justice system related to the operation of courts, bailiffs and other law enforcement bodies and related proceedings. As for the process of related Act development and adaptation - no preliminary information has been published to involve the public and other actors in its development, which is usually the case in standard policy-making processes in Slovakia.

- *Formulation* - the relevant questions are: Has the draft document been made available to the public prior to its entry into the adoption process?

  As for the above stated COVID-19 Act adopted in Slovakia the public has not been involved in commenting on the draft of the Act that is usually the case in policy-making via a special public platform formed for this objective.

- *Adoption* - the relevant questions are: Has the draft document been made available to the public as it was submitted for the adoption process (including any appendices, addenda, implementation resolutions)? Have individual proposed amendments been made available to the public as well as the text of the document as it would look following the incorporation of the amendment(s)? Has the final approved text been made available to the public?

In the adoption process of the COVID-19 Act was available on a special online platform (www.rokovania.sk) before being approved by the Slovak Government and then available on the Parliamentary platform - www.nrsr.sk.

- *Implementation* - here the questions are the same as in the formulation and adoption stages, but they concern implementation documents, such as secondary/tertiary legislation and court/regulatory decisions: Has the draft document been made available to the public prior to its final approval (including any appendices, addenda, implementation resolutions)? Have individual proposed amendments been made available to the public as well as the text of the document as it would look following the incorporation of the amendment(s)? Has the final approved text been made available to the public?
  As for the COVID-19 Act - its final version has been published in the www.slov-lex.sk and www.nrsr.sk.
- *Evaluation* - the relevant questions are: Have all evaluations of the policy, law or regulation, commissioned or conducted by government bodies, been made public?
  The evaluation of The COVID-19 Act has not been conducted yet and there is no legal duty established to conduct it.

Altogether, the evaluation of the substantive transparency of the COVID-19 Act using this framework indicates a low level of transparency throughout the cycle.

The second element is **rationale** - the "why" of the policy. Public authority should not be used arbitrarily and the ability to justify a decision or a proposal is generally seen as a key precondition of any legitimate act of public authority. For example, draft laws usually contain detailed justification and courts usually strike down any individual decision by a public authority if it does not contain justification that can be examined. Again, this should be examined for all stages of the policy process:

- *Agenda-setting* - the relevant questions are: If there has been an announcement that something will be done about a certain topic, does the announcement specify why and with what objectives?
  The Act developed to tackle COVID-19 pandemic has not been included in the legislative plan of the government, no preliminary information has been provided to the public related to its rationale.
- *Formulation* - the relevant questions are: Has the overall rationale for the draft been made public, particularly the analysis of the current situation/definition of the problem, alternative options, reasons for the selection of the chosen policy option and results of the

legality/constitutionality/proportionality check? Has the rationale for individual elements of the proposal been made public? Has the rationale for proposed amendments been made public?

The COVID-19 Act provided basic information related to the need for this legislation. Alternative options were not publicly available for chosen policy options.

- *Adoption* - the relevant questions are: If the proposal underwent significant changes during the adoption process, has the updated rationale been made public?

  As for The COVID-19 Act the rationale related to the significant changes that have been introduced during its adoption has not been made public.

- *Implementation* - the relevant questions are: Has the overall rationale for the draft secondary legislation been made public, particularly why a specific approach to the implementation has been chosen? Has the rationale for court/regulatory decisions implementing the document been made public?

  The overall rationale for secondary legislation related to COVID-19 Act has not been made public in advance.

- *Evaluation* - the relevant questions are: Has an evaluation of the original rationale been made public (i.e. evaluation not just of results, but also of outcomes and the intervention logic)?

  The evaluation of the original rationale related to COVID-19 Act has not been made public.

In terms of the transparency of reasons for the legislation, there was essentially zero transparency with regard to the COVID-19 Act.

The third element is the **process** - what is the transparency of the process by which the relevant document is proposed, amended and approved? The first two areas are crucial in terms of providing actors with information on the substantive aspects of the policy. However, if one accepts that the ability to analyze the proposal and modify the proposal is crucial to the benefits of transparency, then these two areas would create an incomplete framework without a third element dealing with the process.

- *Agenda-setting* - the relevant questions are: Has information on the trigger for changes been made public? Who initiated and why? Has information on how the public can submit its views been made public?

  The public was not involved in the formalized process to develop The COVID-19 Act. No platform was used to gather insights from the public in this process.

- *Formulation* - the relevant questions are: Has the information on who

participated in the formulation process been made public (what institutions and persons)? How were they selected? Has information on how the public can make proposals to be included in the draft been made public?

The public was not involved in the formalized process to develop The COVID-19 Act. No platform was used to gather insights from the public in this process.

- *Adoption* - the relevant questions are: Has the information on who proposed amendments been made public? Has information on how amendments can be proposed and by whom been made available? Has information on how relevant individuals and bodies voted on each proposal and amendment available? In the absence of voting, is information on how amendments were dealt with available?

  The information on the adoption of particular amendments within the COVID-19 Act are public by online platform www.nrsr.sk. The same is the case on how relevant individuals voted.

- *Implementation* - the relevant questions are the same as in the formulation and adoption stages, but with application to secondary/tertiary legislation and court/regulatory decisions.

  The government decrees as well as ministerial decrees related to the implementation of the COVID-19 Act are available on www.slov-lex.sk.

- *Evaluation* - the relevant questions are: Has information on who commissioned the evaluation and through what process been made public? Has there been an opportunity for the public to comment/make suggestions as a part of the evaluation process?

  The evaluation of The COVID-19 Act has not been conducted yet and there is no legal duty established to conduct it.

Again, the transparency with regard to the process of the COVID-19 Act preparation and approval was low.

The last element in measuring the transparency of the policy process is **impact**. It deals with what is going to happen once the policy becomes a reality, more specifically costs and benefits, disaggregated over groups. Impact assessments generally cover one or more of the following categories: impact on society and individual groups (businesses, households…), fiscal impact and environmental impact. Given the complexity of the contemporary regulatory and policy environment, there has been a massive growth in impact assessment as a part of the public policy cycle:

- *Agenda-setting* - the relevant questions are: If there has been an

announcement that something will be done about a certain topic, does the announcement specify any expected impacts?

No preliminary information on impact was provided to the public when the COVID-19 Act was developed.

- *Formulation* - the relevant questions are: What impacts are covered in the published draft? Are all impact assessment documents published? Does publicly available impact assessment provide specific and quantified information? Has the information on who prepared the impact assessment been made public?

  The impact assessment was not conducted when the COVID-19 Act was developed.

- *Implementation* - here the questions are essentially the same as in the formulation stage, but they concern implementation documents, such as secondary/tertiary legislation and court/regulatory decisions. The questions are relevant in the case of secondary and tertiary legislation only if it introduces new types of impacts compared to the primary document.

  As for the government decrees and ministerial decrees related to the implementation of the COVID-19 Act formalized impact assessment is not publicly available.

- *Evaluation* - the relevant questions are: Does evaluation contain ex-post impact assessment in identical/similar structure to the original impact assessment? Has information comparing original impact assessment with ex-post evaluated impact been made public?

  The COVID-19 Act has not been evaluated yet.

Finally, with regard to impact, the transparency of the policy cycle was essentially zero for the COVID-19 Act.

Altogether, the illustrative example of the Slovak COVID-19 Act shows the value of the framework by comprehensively evaluating the transparency of all aspects of the policy cycle and thus demonstrating very low levels of transparency in its approval.

Conclusion

The paper develops a conceptual framework for measuring the transparency of public policy based on a review of the existing literature on the transparency of government, with special attention to the transparency of public policy processes, its benefits and measurement. Based on this review, the paper proposes two conceptual innovations.

First of all, it posits five benefits of public policy transparency. The first three concern primarily the relationship between government and the public: improving accountability of public institutions through their better monitoring; equalizing access to power and creating a more level playing field in the society as a whole; improving compliance with policies and regulations. However, there are two additional benefits, which focus more on policy-makers themselves: improving the decision-making process by creating a more level playing field between policy-makers themselves; and decreasing policy-makers' bias and correcting information asymmetries through feedback.

The second conceptual innovation is a comprehensive two-dimensional matrix for the actual measurement of the transparency of public policy processes. The framework relates to specific policy documents or legislation and allows to score the transparency of the related policy cycle. The first dimension therefore concerns the five stages of the policy cycle: agenda-setting; formulation; adoption; implementation; and evaluation. In each stage, transparency should be measured for each of the four essential elements: substance, rationale, process, and impact.

The paper illustrates the use of the framework through an illustrative example of the passage of the COVID-19 legislation in Slovakia at the beginning of the pandemic in March 2020. Its comprehensive approach demonstrates that, despite the text of the draft and adopted law being published during parliamentary deliberations, the overall transparency of the policy process in this case was extremely low.

Miroslav Beblavý is the executive manager of ESPRI - a private research and consulting company in Bratislava, a scientific coordinator at EENEE (European Expert Network on Economics of Education) and an adjunct lecturer at Sciences Po in Paris.

Emília Sičáková-Beblavá is the director at the Institute of Public Policy, Faculty of Social and Economic Sciences at the Comenius University in Bratislava, which offers masters and doctor degree program in public policy. In her research, she focuses on the relation between the politics and administration, on corruption and on behavioral public administration.

Barbara Bačová is a student at the Human, Social, and Political Sciences at the Cambridge University, with a focus on social anthropology.

REFERENCES

AKERLOF, G. A., 1970: The Market for 'Lemons': Quality Uncertainty and the Market Mechanism. Quarterly Journal of Economics, 84(3), 488-500. https://doi.org/10.1016/B978-0-12-214850-7.50022-X.

ARCHEL, P. – HUSILLOS, J. – LARRINAGA, C. – SPENCE, C., 2009: Social Disclosure, Legitimacy Theory and the Role of the State. Accounting, Auditing & Accountability Journal, 22, 1284-1307. https://doi.org/10.1108/09513570910999319.

ARGYRIS, C., 1991: Teaching Smart People How to Learn. In J. V. Gallos (eds.), Organization Development. CA: Jossey-Bass, 267–285.

ARNOLD, R. D., 1990: The Logic of Congressional Action. Yale University Press.

BALL, C., 2009: What Is Transparency?. Public Integrity, Fall 2009, 11(4), 293–307. https://doi.org/10.2753/PIN1099-9922110400.

BAUMAN, C. W. – SKITKA, L. J., 2009: Moral Disagreement and Procedural Justice: Moral Mandates As Constraints to Voice Effects. Australian Journal of Psychology, 61(1), 40-49. https://doi.org/10.1080/00049530802607647.

BESLEY, T. – BURGESS, R., 2002: The Political Economy of Government Responsiveness: Theory and Evidence from India. The Quarterly Journal of Economics, 117(4), 1415-1451. https://doi.org/10.1162/003355302320935061.

BRUNSWICKER, S. – PRIEGO, L. P. – ALMIRALL, E., 2019: Transparency in Policy Making: A Complexity View. Government Information Quarterly, 36(3), 571-591. https://doi.org/10.1016/j.giq.2019.05.005.

CAPLAN, B., 2002: Systematically Biased Beliefs About Economics: Robust Evidence of Judgemental Anomalies from the Survey of Americans and Economists on the Economy. Economic Journal, 112, 433–458. https://doi.org/10.1111/1468-0297.00041.

CAREY, J., 2004: Visible Votes: Recorded Voting and Legislative Accountability in Latin America. Unpublished paper, April.

CHVALKOVSKÁ, J. – SKUHROVEC, J., 2010: Measuring Transparency in Public Spending: Case of Czech Public E-procurement Information System, 11. IES working paper.

DAVIS, J., 1998: Access to and Transmission of Information: Position of the Media. Openness and transparency in the European Union, 121-126.

DE CHANTAL, P. L. – NEWMAN, I. R. – THOMPSON, V. – MARKOVITS, H., 2020: Who Resists Belief-biased Inferences? The Role of Individual Differences in

Reasoning Strategies, Working Memory, and Attentional Focus. Memory & Cognition 48, 655–671. https://doi.org/10.3758/s13421-019-00998-2.

DREYER, S. – ZIEBARTH, L., 2014: Participatory transparency in social media governance: combining two good practices. Journal of Information Policy, 4, 529-546. https://doi.org/10.5325/jinfopoli.4.2014.529.

DUDLEY, S. E. – WEGRICH, K., 2015: The Role of Transparency in Regulatory Governance: Comparing US and EU Regulatory Systems. Journal of Risk Research, 19(9), 1141-1157. https://doi.org/10.1080/13669877.2015.1071868.

EIJFFINGER, S. C. – GERAATS, P. M., 2006: How transparent are central banks?. European Journal of Political Economy, 22(1), 1-21. https://doi.org/10.1016/j.ejpoleco.2005.09.013.

ESCHENFELDER, K. R., 2004: Behind the Web site: An inside look at the production of Web-based textual government information. Government Information Quarterly, 21(3), 337-358. https://doi.org/10.1016/j.giq.2004.04.004.

FISKE, A. P. – TETLOCK, P. E., 1997: Taboo Trade-offs: Reactions to Transactions That Transgress the Spheres of Justice. Political Psychology, 18(2), 255-297. https://doi.org/10.1111/0162-895X.00058.

FOX, J., 2007: Government Transparency and Policymaking. Public Choice, 131(1-2), 23-44. https://doi.org./10.1007/s11127-006-9103-3.

FRANK, M., 2015: Unless we change the way we think about transparency, open data is unlikely to have a significant political impact at the local level. Democratic Audit Blog.

GARRIDO-RODRÍGUEZ, J. C., - ZAFRA-GÓMEZ, J. L. - LÓPEZ-HERNÁNDEZ, A. M., 2017: Measuring Local Government Transparency. Influence of Political Sign in Multidimensional Analysis. Lex Localis-Journal of Local Self-Government, 15(4). https://doi.org/10.4335/15.4.889-917(2017).

International Budget Partnership (2020) Open Budget Survey 2019.

JANSSEN, M. – HELBIG, N., 2018: Innovating and Changing the Policy-cycle: Policy-makers Be Prepared!. Government Information Quarterly, 35(4), 99-105. https://doi.org/10.1016/j.giq.2015.11.009.

KAHNEMAN, D. – KNETSCH, J. L. – THALER, R. H., 1991: The Endowment Effect, Loss Aversion, and Status Quo Bias. Journal of Economic perspectives, 5(1), 193-206. https://doi.org/10.1257/jep.5.1.193.

KAUFMANN, D. – BELLVER, A., 2005: Transparenting Transparency: Initial Empirics and Policy Applications.

KRASTEV, I., 2020: Does More Transparency Mean More Trust? Open Government Partnership website: https://www.opengovpartnership.org/trust/does-more-transparency-mean-more-trust.

LIEDORP, F. – MOSCH, R. - Van Der CRUIJSEN, C. – De HAAN, J., 2013: Transparency of Banking Supervisors. IMF Economic Review, 61(2), 310-335. https://doi.org/10.1057/imfer.2013.11.

LINDERS, D., 2012: From E-government to We-government: Defining a Typology for Citizen Coproduction in the Age of Social Media. Government Information Quarterly, 29(4), 446-454. https://doi.org/10.1016/j.giq.2012.06.003.

LOCKE, J., 1690: Second Treatise of Government, An Essay Concerning the True Origin, Extent, and End of Civil Government. London: Awnsham Churchill by Amen-Corner Sections 164–65. https://doi.org/10.12987/9780300129182-005.

MacCOUN, R. J., 2006: Psychological Constraints on Transparency in Legal and Government Decision Making. In Gosseries A. (ed.), Symposium on Publicity and Accountability in Governance, Swiss Political Science Review, 12, 112-123.

MARGETTS, H., 2011: The Internet and Transparency. The Political Quarterly, 82(4), 518-521. https://doi.org/10.1111/j.1467-923X.2011.02253.x.

MATHEUS, R. – JANSSEN, M. – MAHESHWARI, D., 2018: Data Science Empowering the Public: Data-driven Dashboards for Transparent and Accountable Decision-making in Smart Cities. Government Information Quarterly. https://doi.org/10.1016/j.giq.2018.01.006.

MEIJER, A., 2013: Understanding the Complex Dynamics of Transparency. Public Administration Review, 73(3), 429-439. https://doi.org/10.1111/puar.12032.

MOON, M. J., 2020: Fighting Against COVID-19 with Agility, Transparency, and Participation: Wicked Policy Problems and New Governance Challenges. Public Administration Review, 80, 651-656. https://doi.org/10.1111/puar.13214.

MUTHOMI, F. – THURMAIER, K., 2021: Participatory Transparency in Kenya: Toward an Engaged Budgeting Model of Local Governance. Public Administration Review, 81(3), 519-531. https://doi.org/10.1111/puar.13294.

OLSON, M., 2009: The Logic of Collective Action: Public Goods and the Theory of Groups, Second Printing with a New Preface and Appendix (Vol. 124). Harvard University Press.

OTENYO, E. E. – LIND, N.S., 2004: Faces and Phases of Transparency Reform in Local Government. International Journal of Public Administration, 27(5), 287-307. https://doi.org/10.1081/PAD-120028811.

PEÑA-LÓPEZ, I., 2001: Citizens as Partners. OECD Handbook on Information, Consultation and Public Participation in Policy-making.

PERSSON, T. – TABELLINI, G., 2016: Political Economics. Cambridge, MA: MIT press.

POPPER, K. R., 1959: The logic of scientific discovery. Basic Books.

PRAT, A., 2005: The Wrong Kind of Transparency. American Economic Review, 95(3), 862–877. https://doi.org/10.1257/0002828054201297.

RELLY, J. E. – SABHARWAL, M., 2009: Perceptions of Transparency of Government Policymaking: A Cross-national Study. Government Information Quarterly, 26(1), 148-157. https://doi.org/10.1016/j.giq.2008.04.002.

SCHAUER, F., 2011: Transparency in three dimensions. U. Ill. L. Rev., 1339.

SCHWAB, K., 2018: The global competitiveness report 2018. In World Economic Forum (Vol. 671).

SHAFIR, E. (Ed.), 2013: The Behavioral Foundations of Public Policy. Princeton University Press. https://doi.org/10.1515/9781400845347.

SNYDER, Jr. J. M. – TING, M. M., 2005: Why Roll Calls? A Model of Position-taking in Legislative Voting and Elections. Journal of Law, Economics, and Organization, 21(1), 153-178. https://doi.org/10.1093/jleo/ewi007.

SUROWIECKI, J., 2004: The Wisdom of the Crowds: Why the Many Are Smarter Than the Few. London: Abacus.

TETLOCK, P. E. – KRISTEL, O. V. – ELSON, S. B. – GrREEN, M. C. – LERNER, J. S., 2000: The Psychology of the Unthinkable: Taboo Trade-offs, Forbidden Base Rates, and Heretical Counterfactuals. Journal of Personality and Social Psychology, 78(5), 853. https://doi.org/10.1037//0022-3514.78.5.853.

TSANG, E. W. – KWAN, K. M., 1999: Replication and theory development in organizational science: A critical realist perspective. Academy of Management review, 24(4), 759-780. https://doi.org/10.5465/amr.1999.2553252.

UN, 2022: The UN E-Government Development Database, About, https://publicadministration.un.org/egovkb/en-us/about.

Úrad splnomocnenca vlády SR pre rozvoj občianskej spoločnosti, 2014: Pravidlá zapájania verejnosti do tvorby verejných politík, https://www.employment.gov.sk/files/slovensky/rodina-socialna-pomoc/tazke-zdravotne-postihnutie/pravidla-zapajania-verejnosti_verejne-politiky-1.pdf

Úrad splnomocnenca vlády SR pre rozvoj občianskej spoločnosti, 2015: Metodické usmernenie pre Správu o účasti verejnosti na tvorbe právneho predpisu, https://www.minv.sk/swift_data/source/rozvoj_obcianskej_spolocnosti/participacia/Metodicke-usmernenie_Sprava-o-ucasti-verejnosti_final.pdf

VISHWANATH, T., - KAUFMANN, D., 1999: Towards transparency in finance and governance. Available at SSRN 258978. http://dx.doi.org/10.2139/ssrn.258978.

WEBER, R. H. – KAUFMAN, C., 2010: The Role of Transparency in Financial Regulation. Journal of International Economic Law, 13(3), 779-797. https://doi.org/10.1093/jiel/jgq037.

Web pages:

https://dictionary.cambridge.org/

https://www.merriam-webster.com/

https://www.etymonline.com/word/transparency

https://www.etymonline.com/word/transparent

http://www.minv.sk/swift_data/source/rozvoj_obcianskej_spolocnosti/aktuality/participacia/2014/05/Pravidla-zapajania-verejnosti_verejne-politiky.pdf

https://www.consilium.europa.eu/sk/general-secretariat/corporate-policies/transparency/

https://www.minv.sk/swift_data/source/rozvoj_obcianskej_spolocnosti/participacia/Metodicke-usmernenie_Sprava-o-ucasti-verejnosti_final.pdf

http://www.minv.sk/?ros_participacia&sprava=pravidla-zapajania-verejnosti-do-tvorby-verejnych-politik-1

https://www.employment.gov.sk/files/slovensky/rodina-socialna-pomoc/tazke-zdravotne-postihnutie/pravidla-zapajania-verejnosti_verejne-politiky-1.pdf

https://tcdata360.worldbank.org/indicators/h7da6e31a?country=BRA&indicator=687&countries=SVK&viz=line_chart&years=2007,2017

https://rm.coe.int/transparency-and-open-government-governance-committee-rapporteur-andre/16808d341c