

## Why Choose Open Government? Motivations for the Adoption of Open Government Policies in Four European Countries

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*Open government policies (on transparency, participation, and collaboration, but also on digital technology) are spreading across Europe as a new governance model, but are not homogeneous across different countries. By adopting a qualitative computer-assisted analysis of policy documents from France, Italy, Spain, and the United Kingdom, we mapped the different meanings of open government by examining the specific measures and key motivations for their adoption in order to find out how different national governments frame the variables of open government. The article shows the emergence of competing models of open government: on the one hand, the hegemonic model of open government seems to stress innovation and openness in the sense of an enhanced transparency, and occasionally of public-private collaboration, but failing to achieve an open decision making. We have detected a paradox in the open government implementation: the economic lens, although softened by a drive toward innovation, anchors the policy-making process in already-consolidated mechanisms, rather than in substantive change. On the other hand, we can foresee the emergence of a different perspective on open government, which provides a proper policy framework for democratic innovations to develop.*

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**KEY WORDS:** open government, collaborative governance, new public management, digital democracy, democratic innovations, NPM, open data

### Introduction

The concept of “open government” has been debated for 25 years, a period in which scholars have been addressing different models of governance and decision making. In particular, open government is thought to be challenging previous models of public sector agency and structure, such as the bureaucratic state and the New Public Management (NPM),<sup>1</sup> by defining new forms of relationship among government, citizens, and digital technologies.

In this article we explore how open government is spreading in Europe, and adapting to specific political ideologies and agendas. Moving from the presumption that open government policies (i.e., policies on the issues of transparency, participation, and collaboration) are not homogeneous across different countries,

we want to assess similarities and differences across national implementation of open government in Europe. In particular, we assume that a strong tradition of the NPM paradigm in some countries has partially favored a semantic shift from “government” to “governance” but at the same time hindered the establishment of a collaborative governance approach. In countries like France, with a strong tradition of democratic participation and organized movements, collaborative governance has been more easily established, despite (or perhaps because of) the presence of a strong central state. In other words, the abandonment of the NPM paradigm, notably in the United Kingdom between the 1990s and early 2000s, has facilitated experiences of deliberative democracy but not necessarily in the frame of collaborative governance; in France, by contrast, collaborative governance has taken root on a preexisting cultural sensitivity to participatory democracy. Where the bureaucratic apparatus has been somewhat resistant to NPM, as in France for instance, we expect to observe a different interpretation of open government, taking into account the country’s organization and especially its tradition of public debates (*débat publique*). Just halfway between those two patterns, cases like Spain and Italy, where recent austerity measures have imposed a rapid change in the administrative structure and agency, can reveal other pathways toward the implementation of open government.

Our interest is twofold: on the one hand, we want to map the meaning of open government, looking at the specific measures being focused on by different national governments. On the other hand, we want to find out which are the key motivations for the adoption of these measures and how different national governments frame the variables of open government, adapting them to the specific contexts. For our purposes, we define open government by referring to the three basic variables, as proposed by many observers (De Blasio, 2014, 2016; Noveck, 2010; O’Reilly, 2010; Sorice, 2014): transparency, participation, and collaboration. In particular, as Bingham (2010) claimed, open government programs (especially the White House Open government directive) are heavily reliant on the collaborative governance model, insofar as they aim to involve actors like citizens, private companies and nonprofit organizations in the policy-making process, through both in-person and online methods. We use this definition of collaborative governance, while also considering another indicator (the presence or not of a deliberative democratic approach to the decision-making process) as inherited by another conceptual perspective on collaborative governance.<sup>2</sup> Moreover, we take into account the role of digital technologies as essential to enhance transparency, participation, and collaboration programs and practices, beyond the perspective of e-government and e-service delivery (De Blasio, 2014); as our study will further clarify, governments assign much importance to digital technologies in their policy documents concerning open government.

Based on an innovative approach to comparative policy analysis, supported by a combination of frame analysis and computer-aided content analysis, our article addresses the conceptual variability of open government by examining its implementation in four European countries: France, Italy, Spain, and the United Kingdom. The first section provides the theoretical background of our

study; we discuss theories of open government, collaborative governance, and deliberative democracy with specific reference to previous models of the state, notably the bureaucratic state, and the NPM. After describing our methodology and coding protocol in the next section, we present the findings of our research and draw conclusions, also clarifying some relevant policy implications.

### The Variables of Open Government

Since its earliest appearances in official discourses, policy programs and academic articles, open government has been defined by comparing it with previous models of administrative structure and agency. In Scandinavian countries open government has always been interpreted as the right for citizens to access information, in contrast to bureaucratic secrecy; a concept dating back to the eighteenth century (Grønbech-Jensen, 1998). In Western democracies, the debate originated in the 1960s with the promotion of the Freedom of Information Act in the United States (passed in 1966), and gradually expanded to the United Kingdom (where the Freedom of Information Act was approved in 2000) and several other European countries. This movement toward a greater transparency led to the creation of open government data repositories and portals at the end of the 2000s, first in the United Kingdom and then in the United States (Clarke & Margetts, 2014). Although the traditional definition of open government is grounded in transparency, access to information, and accountability, some authors have noted that in recent times the concept has begun to be further stretched to include also participation, collaborative governance, and the use of digital technology to enhance those (Clarke & Francoli, 2014; De Blasio, 2014).<sup>3</sup>

In particular, Noveck (2010) identified the core driver of change in openness versus closedness; she contrasts open government with the closed, highly hierarchical, and monolithic model of decision making that has been a distinctive feature of bureaucratic systems since the description given by Max Weber (2002). Keeping in mind the example of Obama's 2008 electoral campaign, Noveck (2010) claims that the advent of collaborative practices through the Internet has resulted in a resurgence in theories of direct and deliberative democracy, further sustained by a network approach to the study of society and organizations (Castells, 1996). Prior to this, Osborne (2010) already claimed the emergence of a "networked governance" or "new public governance" rooted in government's ability to form communities and networks with private actors and citizens.

In effect, the bureaucratic state has been already challenged by the NPM; a doctrine that spread across the world since the late 1970s and 1980s, especially in (but not limited to) the United States, the United Kingdom, and several other countries,<sup>4</sup> despite being less implemented in most European countries (Mulgan, 2014; Osborne, 2010). This approach found fertile ground in the context of administrative change driven by four "megatrends:" (i) the willingness to decrease public spending and staffing; (ii) the shift toward privatization, quasi-privatization, and subsidiarity between public and private actors; (iii) the increasing use of automation and information and communications technology;

and (iv) the process of internalization of policies and of coordination at a supranational level. While having in mind that NPM is “a cluster of phenomena” rather than a single paradigm, we define it according to Hood’s (1991) analysis and acknowledge some common features:

1. Hands-on professional management, with higher degrees of autonomy and managerial powers.
2. Stress on the measurement of performance and results through quantitative units.
3. Disaggregation of units and devolution of powers to agencies and local governments.
4. Emphasis on market-style mechanisms such as contracting, competition, and outsourcing.
5. Logic of customer care and service provision.

Since the mid-1990s and with more insistence through the 2000s, scholars have increasingly started to talk about the NPM being overcome: for example, Denhardt and Vinzant Denhardt (2000) wrote about a “New Public Service” rooted in theories of participatory and deliberative democracy; Fung and Wright (2001) described cases of “empowered participatory governance”; Hood and Peters (2004) claimed for the “middle aging” of NPM, because they observed it was becoming paradoxical and generating unintended consequences; Dunleavy, Margetts, Bastow, and Tinkler (2005) asserted the death of NPM and observed the emergence of “Digital Era Governance”; and Osborne (2010) proposed the “networked governance” or “new public governance,” as already noted. As this incomplete list suggests, a part of the academic community has detected a crisis in the hegemony of NPM in favor of other models, such as collaborative governance.<sup>5</sup>

In defining the concept of collaborative governance, Ansell and Gash (2007) stress six points:

1. Public agencies and institutions are the primary promoters of collaborative practices, in the sense that collaborative governance remains a way of exercising public authority.
2. Multiple nonstate stakeholders are involved in the process, either in the form of associations representing relevant interests (associational multistakeholderism) or through the direct participation of interested and affected individuals.
3. Participants have a real decision-making power and are not merely consulted.
4. Collaboration has a formal framework, distinguishing it from informal networks, and interest groups.
5. The process is oriented to reach participant consensus (although full consensus is hard to achieve) as opposed to authoritarian decision making.
6. The goal is the formation of public policies or the management of public resources.

In collaborative governance, the process of governing is thus articulated in a network of actors who are partners in decision making: the state can be best conceived as a platform (O’Reilly, 2010) providing resources, rules and skills in

order to build a “facilitating framework” for all the other stakeholders to collaborate (Dunleavy et al., 2005). In addition to citizens and the government, another actor gains importance in contemporary collaborative governance: online platforms, such as participatory portals and open data repositories, can in fact serve as tools helping both citizens and institutions to sustain a continuous dialogue, share knowledge and competences, and foster collaborative processes (De Blasio, 2014; Noveck, 2009).

### Questioning Open Government Policies

Our proposal is to consider open government as a policy agenda that is best implemented in deliberative democracy and collaborative governance models, but that can also be adapted to other models of administration, as previously stated by De Blasio (2014, 2016). As part of a wider research project on open government and digital democracy, in this article we want to assess how the open government agenda is interpreted in different national contexts, highlighting similarities and differences. In particular, we have moved from the hypothesis that open government is adapting to preexisting models of administration (notably the NPM) and to historical contingencies (i.e., the economic crisis); we expect to observe the trend toward an “economic turn” of open government, significantly reducing the weight of collaborative governance and deliberative democracy in favor of principles of efficacy, efficiency, transparency, and growth, especially in countries such as Italy and Spain, where the economic crisis is deeper than in United Kingdom and France. As already discussed, we took those two latter as opposite ideal types with reference to the depth and persistence of NPM, the first coherent administrative model to use principles, methods, and evaluation criteria drawn from the economic realm (Table 1).

As a governance model, open government enhances transparency through horizontal accountability mechanisms (Mulgan, 2014), such as the disclosure of open data, the provision of tools to discuss and debate with administrators, and extending the monitoring and enforcing powers of citizens. Participation can be achieved in increasing degrees (De Blasio, 2014, 2016): public consultations are

**Table 1.** Actors and Models of Governance

	Bureaucratic State	New Public Management	Open Government (or Collaborative Governance)
Government	Structure: unitary, hierarchical, and professional. Agency: dominance of rule of law	Structure: flexible and fragmented (autonomous units). Agency: managerial and private-sector models	Structure: network. Agency: government as platform and facilitating framework
Citizens	External counterparts	Customers and clients	Partners
Digital technology	n.a.	e-government, e-service delivery	Online platforms to support, dialogue, and collaboration

just the first step for fully shared decision making. Deliberative arenas such as citizen assemblies, citizen juries, and public debates stand in an intermediate realm, being open to a higher degree of participation than the mere consultation but still not guaranteeing that it is going to influence the policy. Finally, collaboration is actualized in three dimensions (De Blasio, 2014, 2016; Sorice, 2014): horizontal procedures involving multiple stakeholders; transversal policies shared by multilevel institutions such as supranational, national, regional, and local governments; and circular subsidiarity, notably in the form of public–private–civic partnerships and “shared administration.”<sup>6</sup> Hence, open government can be conceived as a progressive stage model, from access to information (in transparency) to full collaborative governance, in which the power of decision making is symmetrical among all the participants (Table 2).

As a policy agenda, open government is composed of four variables or issues: transparency, participation, collaboration, and digital technologies in democratic processes (De Blasio, 2014). Although with relevant differences, this agenda indeed finds some roots also in the NPM ideal type<sup>7</sup> (see Table 3): in particular, NPM’s approach to transparency emphasizes the accountability of results and the measurement of performance (Hood, 1991; Mulgan, 2014), while collaboration is exemplified in public–private partnership and the “openness” to privatize administrative activities and to import market-style mechanisms (Hood, 1991; Osborne, 2010; Roberts, 2014), and the use of digital technology is mostly confined to a managerial logic of service provision (Reddick, 2011). Public participation in a deliberative perspective is completely neglected in the NPM agenda; basic feedback channels and direct democracy tools are only accepted as long as they provide insights into customer satisfaction, with decision-making authority still lying with political leaders (Hood, 1991).

Although all the four variables of the open government agenda are interpreted in different ways, participation, collaboration, and digital technology are the most challenging areas, because they imply a strong reform of public administration, whereas transparency goals (i.e., the disclosure of open data and the provision of monitoring tools) do not imply a major restructuring of the

**Table 2.** Variables and Dimensions of Open Government (Démocratie Ouverte, Cited in De Blasio 2014 and 2016 With Examples)

Variables	Dimensions	Examples
Transparency	Information and open data	Open data portals
	Training programs	Digital inclusion policies
Participation	Public policies monitoring	Follow-the-money, access to information
	Consultation	Online consultation
	Deliberative arenas	Public debates, online forums
Collaboration	Co-decision of public policies	Co-drafting, consensus-oriented procedures
	Horizontality	Multistakeholderism
	Transversality	Multilevel governance
	Collaborative governance	Public–private–civic partnership, shared decision making

**Table 3.** Comparison Between NPM and Open Government

New Public Management	Variables	Open Government
Accountability of results, measurement of performance (Hood, 1991; Mulgan, 2014; Osborne, 2010)	Transparency	Horizontal accountability (Mulgan, 2014); disclosure (open data), debate (civic skills), enforcement (monitoring) (De Blasio, 2014; Mulgan, 2014)
Citizens as customers and clients; feedback as measurement of performance; direct democracy to counterbalance elitist character (Hood, 1991)	Participation	Consultation (conservative), deliberation (innovative), co-decision (citizens as equal partners; De Blasio, 2014)
Market-style mechanisms (Hood, 1991; Osborne, 2010); public-private partnership (Roberts, 2014)	Collaboration	Networked governance (Osborne, 2010); collaborative governance (Ansell & Gash, 2007; Bingham, 2010; Foster & Iaione, 2016); public-private-civic partnership, circular subsidiarity (Iaione, 2016); state-platform approach (O'Reilly, 2010)
Managerial model of e-government (Reddick, 2011); e-service delivery	Digital technology	Consultative and participatory models of e-government (Reddick, 2011); digital democracy (De Blasio, 2014)

decision-making process. Moreover, transparency is the only variable indicated in the earliest accounts of open government back in the 1950s, whereas considerations of participation, collaboration, and digital technologies have entered policy documents only in recent years (Clarke & Francoli, 2014). For those reasons, we expect to find in different national policies more variance in the areas of participation, collaboration, and digital democracy than in transparency.

### Methodology

Since our interest is in describing and analyzing the different meanings and policy framings of open government among these countries, we chose an interpretive approach which considers policies as texts and communities of practices (Yanow, 2014); in particular, we focused on how policymakers represent the problems they are facing, their way to solve them, and the stakeholders they involve. This approach is relatively new in policy studies but we were able to find some notable examples in the field of gender policies (Verloo, 2007) and climate change policies (Fletcher, 2009); they both applied frame analysis to find out motivations underlying the measures taken in the policy documents. At the same time, our study proceeds from the already cited analysis of Clarke and Francoli (2014), who addressed similar research questions. In order to clarify the meaning of open government as used in official policy documents, they examined seven Open Government Partnership (OGP) Action Plans, highlighting common features and differences in the definitions adopted. Although relying on a similar approach (notably the textual coding with the software QDA Miner [Provalis Research, Montreal, Canada]), our work differs from Clarke and Francoli's (2014) because we adopted a different research design; in particular, we compared four

European countries, we extended the analysis to different policy documents, and ultimately we used the method of frame analysis in combination with content analysis.

We adopted a comparative perspective focusing on four countries in the European area, following the most similar most dissimilar logic (Engeli & Rothmayr Allison, 2014; Morlino, 2005): Italy, Spain, France, and the United Kingdom.<sup>8</sup> The corpus consists of a collection of three policy documents for each country: the national Digital Agenda and the reuse of Public Sector Information (PSI) Regulation deriving from European Union commitments (absorbing respectively the European Digital Agenda and the directive 37/2013 on reuse of PSI<sup>9</sup>), with the third document being the latest active OGP Action Plan at the time of writing (July 2015; see Table 4).<sup>10</sup> Since this study is an exploratory point of departure for further and wider analysis, in this article we chose to privilege the tightness of the comparison over the number of cases (three policy documents per country, 12 in total), even if limiting the possibility to generalize the results (Morlino, 2005). These documents have been selected because they are a sort of lowest common denominator among the four systems, as they derive from international multilateral commitments; in that way, we have limited the variance of the cases (most similar approach) in order to test our hypothesis about how different historical approaches to governance can shape the interpretation and implementation of open government policies (most dissimilar approach).

All the documents were retrieved from official sources in their entirety and analyzed in their native languages by both authors.<sup>11</sup> We performed a first round of manual coding applying frame analysis to the OGP Action Plans of the four countries in order to build the codebook following a grounded approach and to identify the whole spectrum of issues covered in the policy documents. The method of frame analysis allowed us to distinguish between measures (i.e., specific provisions, pieces of legislation, economic investments, online portals), that we treated as footings, and motivations for adopting them, or frames; in particular, we found three possible frames in economic constraints or opportunities, innovation, and enhancement of democracy. The economic frame refers to motivations oriented to the development of digital economy, the wealth of existing businesses and enterprises, public expenditure efficiency, and national growth in general to foster competitiveness at the international level. The innovation frame is activated when referring to the necessity of modernizing the state apparatus or way of functioning, for example, through the reform of public services toward simplification and efficacy. The democratic frame operates instead through the statement of principles such as transparency, participation, equality, inclusiveness, respect of civil liberties (privacy in particular), and when measures are intended to restore citizens' trust in governments and enhance the social cohesion.

We then analyzed the entire corpus by a qualitative computer-assisted manual coding with the software QDA Miner in order to calculate the code occurrences and co-occurrences of measures and frames through proximity plots, and to compare different countries and policy documents. In particular, we

Table 4. The Corpus of Policy Documents

	France	Italy	Spain	United Kingdom
Digital agenda	Stratégie Numérique (2015, Prime Minister)	Strategia per la crescita digitale 2014–20 (2014, Cabinet Office)	Agenda Digital para España (2013, Minister of industry, energy and tourism and Minister of treasury and public administration)	Government Digital Strategy (2013, Cabinet Office)
Reuse of PSI (as indicated by the European Commission) <sup>15</sup>	Consolidated version of Loi n° 78–753 du 17 juillet 1978 portant diverses mesures d’amélioration des relations entre l’administration et le public et diverses dispositions d’ordre administratif, social et fiscal (2013, Parliament with amends. by Prime minister)	D. Lgs. 18 maggio 2015, n. 102, Attuazione della direttiva 2013/37/UE che modifica la direttiva 2003/98/CE, relativa al riutilizzo dell’informazione del settore pubblico (2015, Cabinet)	Ley 19/2013, de 9 de diciembre, de transparencia, acceso a la información pública y buen gobierno (2013, Parliament)	Data capability strategy (2013, Minister for university and science and Minister for skills and enterprise)
OGP Action Plan	OGP Plan d’Action national 2015–17 (2015, President of Republic)	OGP Piano d’azione nazionale 2014–16 (2014, Cabinet)	OGP Plan de Acción 2014–16 (2014, Prime Minister)	OGP Action Plan 2013–15 (2013, Cabinet office)

subdivided the codebook into two parts: the first part was used to code the specific measures undertaken or announced for each of the variables of open government (digital technology, transparency, participation, and collaboration; see also Table 5); and the second part to code frames and motivations for the adoption of such measures (Table 6). Each unit of text containing a measure, for example a sentence or a longer portion of text, was coded twice (or more, since the frames frequently overlapped), assigning a code for the variable of open government and the frame implied; the software then calculated occurrences and co-occurrences in absolute terms (how many times the code occurred and co-occurred in combination with the other ones).<sup>12</sup>

### Comparing Measures and Frames

Our analysis shows that the four European countries have similarities and differences in both the measures undertaken and the frames in which they motivate their action. Figure 1 is a graphical representation of how the countries resemble one another.

In particular, if we look at measures (Figures 1 and 2; Table 6), we find a least common denominator in all the four countries (circled in red in Figure 1) in

**Table 5.** Codebook for Measures (With Examples)

Variables of Open Government	Codes	Examples of measures
Digital technology	e-services	Digital first, digital by default, e-procedures, e-signatures, digital identity and interoperability programs, e-health, e-justice, e-education
	Networks and connectivity	Investments in digital infrastructures, next generation networks and broadband connection coverage, diffusion of digital technology, diffusion of digital literacy
	Internet governance issues	Privacy protection, digital rights, net neutrality
Transparency	Access to public sector information	Creation of transparency portals, legislation archives, release of policy documents
	Open data	Release of open data, creation of open data portals, creation of open government data license
	Civil servants integrity	Creation of independent anticorruption authority, law on anticorruption, enforcement tools
	Accountability	Publication of budget information, creation of monitoring tools
Participation	Consultation	Online and offline consultations, creation of consultation portals, law on consultations, e-petitions, and feedback channels
	Deliberation	Online and offline deliberative processes, public debates, creation of deliberative portals, co-drafting of policies, law on deliberation, policy labs
Collaboration	Public-private partnership	Public-private partnership forums, public-private investment program, liberalization of public services, outsourcing, contracting, state start-ups
	Collaborative governance	State-platform approach, smart cities, co-production districts, devolution

issues about access and open data, confirming our initial hypothesis: all countries dedicate much more attention to digital technology (36 percent on average) and transparency (and significantly to open data: 43 percent) than to participation (10 percent) and collaboration (11 percent). In France the universal access to public sector information is promoted through measures about open data, digital identity, and interoperability, as well as the provision of training programs for elders, disabled people, and ethnic minorities (“Training programs for the use of

**Table 6.** Comparison of Measures Between Countries (Percent of Code Frequencies for Categories of Measures With Regards to All Coded Segments in Each Country’s Corpus)

Measures Category	Spain	France	Italy	UK	Average
Digital technology	37	24	42	42	36
Transparency	41	46	36	48	43
Participation	7	11	15	8	10
Collaboration	15	19	7	2	11
Total of coded segments	100	100	100	100	100

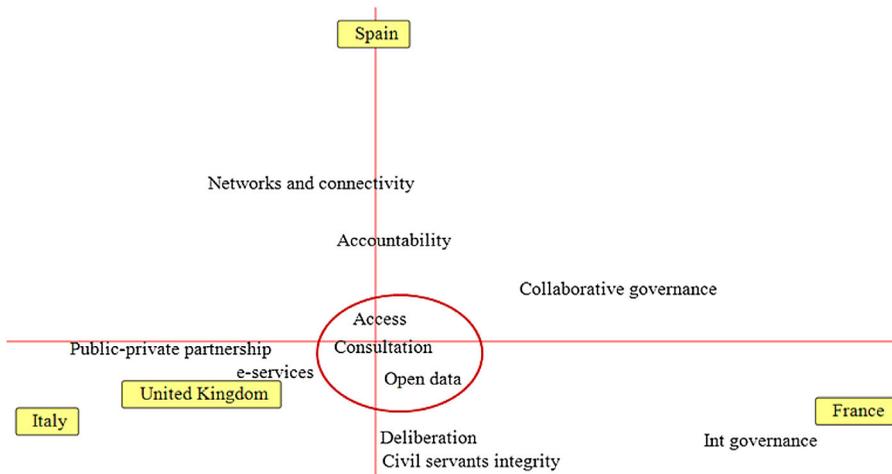
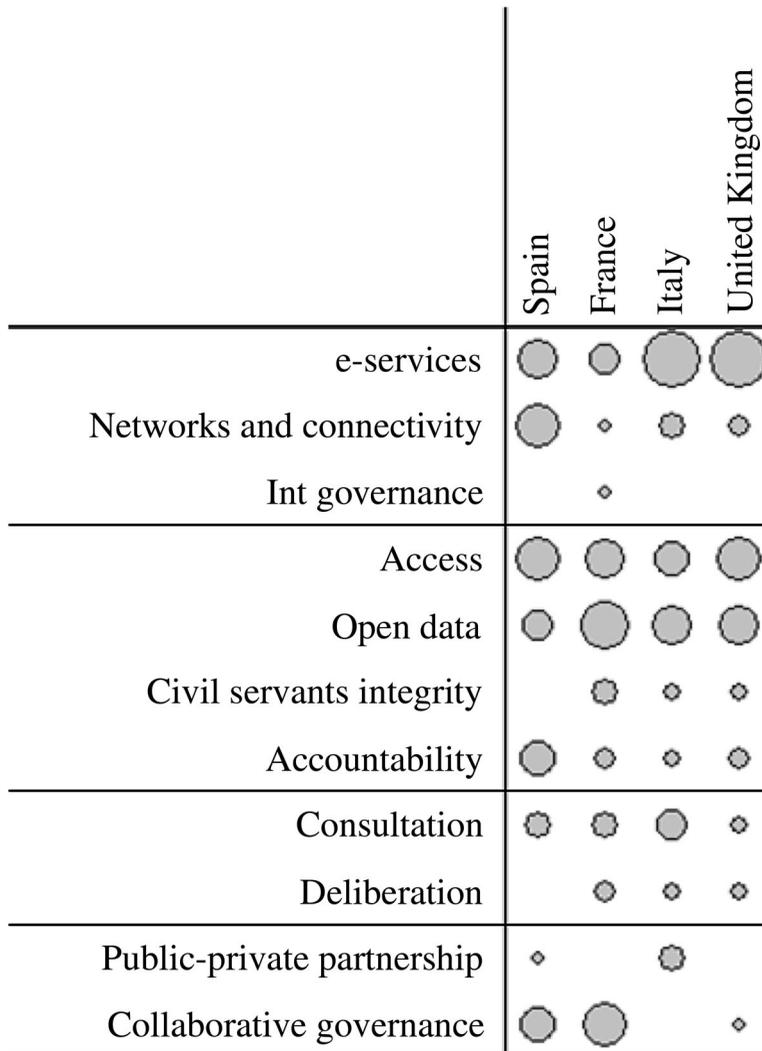


Figure 1. Clustering Countries According to Measures (Own Elaboration with QDA Miner).<sup>16</sup>

digital technology will be reinforced in order to provide a digital mediation framework, including the most distant people: experimentation of a ‘digital advisor’ for elders and enhancement of accessibility for disabled people,” *Stratégie Numérique*, p. 8); in effect, access is deeply linked to a democratic frame, both in the sense that it promotes a monitoring activity by citizens and that it ensures the respect of principles such as equality and inclusion.

In the United Kingdom, alongside with the reform of public services, open data and access are the most developed areas of implementation of open government (48 percent of all coded segments). Transparency measures as a whole, and open data in particular, are linked to accountability, public service efficacy and economic growth; they allow citizens to monitor public expenditure and civil servants’ activities, discouraging corruption, and thus strengthening democracy. At the same time, open data are raw resources to be capitalized through the collaborative work of citizens and companies, who hold the skills and know-how to transform them in innovative products: “Working in partnership with business and academia, the government has developed a shared vision for the UK’s data capability, with the aim of making the UK a world leader in extracting insight and value from data for the benefit of citizens and consumers, business and academia, the public and the private sectors” (*UK Data Capability Strategy*, p. 5).

Italy and Spain are focused on similar issues, notably transparency, digitization of public services, development of digital infrastructure, economic growth, and the fight against corruption. Spain is especially focused on the digitization of some public services such as health, education, and justice, and is working to foster open databases in quantity and quality of data provided, with the creation of the Portal of Transparency (digital technology accounts for 37 percent and transparency 41 percent, respectively, of the overall coded segments in Spanish policy documents). Italian policies on digital technology (42 percent of the Italian



**Figure 2.** Code Frequencies of Measures Compared Between Countries (Own Elaboration With QDA Miner). *Note:* The size of bubbles depends on the code frequency (i.e., how many times a code has been assigned), showing the relative prominence of that code across all the policy documents of a country.

policies) state the principle of “digital first” and the progressive abandonment of analogue transactions (most of all in the sectors of justice, health, education, and local governance, but also in interoperability and e-identity), the development of an infrastructure of connectivity, the diffusion of digital skills among the population, and the effort to coordinate different levels of digitization among different regions and departments. Transparency receives substantial attention (36 percent of the Italian corpus), with particular reference to open data and the principle of access to budgeting information in order to prevent corruption and

allowing civil society to exercise continuous monitoring. On many occasions transparency is stated also as a principle in itself, with reference to accountability of civil servants and the need to restore the credibility of the public administration.<sup>13</sup>

Another feature of all policies is the common reference to consultation practices (also circled in red in Figure 1). All the countries in our sample are increasingly consulting the public and the private sector during the policy-making process (e.g., despite the absence of a specific law on participation, the Spanish government has launched some online consultations with citizens, civil society organizations, trade unions, and experts to reform the regulation for the treatment of drug addiction and the marine rescue sectors; fairly niche areas, admittedly), but again this convergence can be explained by looking at the requirements of the OGP: all countries must elaborate the Action Plans in concertation with civil society organizations. Aside from the four national Action Plans, we found that in the countries we sampled most consultations do not imply a co-decision procedure nor a deliberative process, but are instead intended as private actors' and civil society organizations' recommendations or public surveys. For example, in Italy public participation is mainly ensured through consultation practices both on and offline, occasionally associated with face-to-face debates (following the French model), in a number of matters (education, food products labeling, Constitution, and public administration reforms). They are all different from one another with regard to the way in which the consultations are set up, such as organizing department, timing, ways of answering (e.g., closed answers or open comments), degree of influence on the final policy, and platform; this situation reflects the lack of clear regulation about public participation in the Italian context.

Deliberative processes are best implemented in French policies, notably in matters relating to environmental protection and territorial management,<sup>14</sup> but the government is adopting measures to make deliberation a common procedure for drafting reform bills (notably in matters such as education, justice, welfare; and digital media). The United Kingdom's OGP Action Plan introduces the principle of "open policy making" (p. 39), not yet implemented (as of 2015), indicating it as the new default procedure for the future; examples of open policymaking are the opening of data, consultations (with multiple stakeholders and civil society organizations), policy labs, expert roundtables, cross-departmental teams, and digital arenas where citizens at large can be involved. The French and British governments make many references to collaborative governance, whereas the Italian and Spanish governments more often resort to public-private partnerships in their policy documents. In France digital technologies play a major role for collaborative governance, since it is explicitly following a State-platform approach (*État-plateforme*) in which the government plays the role of moderator of different interests and voices from civil society and private sector. In Spain collaboration is also indicated as a sort of "moral duty" by citizens, who are required to use e-services and to collaborate with the authorities in order to achieve a modernization of the whole society and economic growth, but the

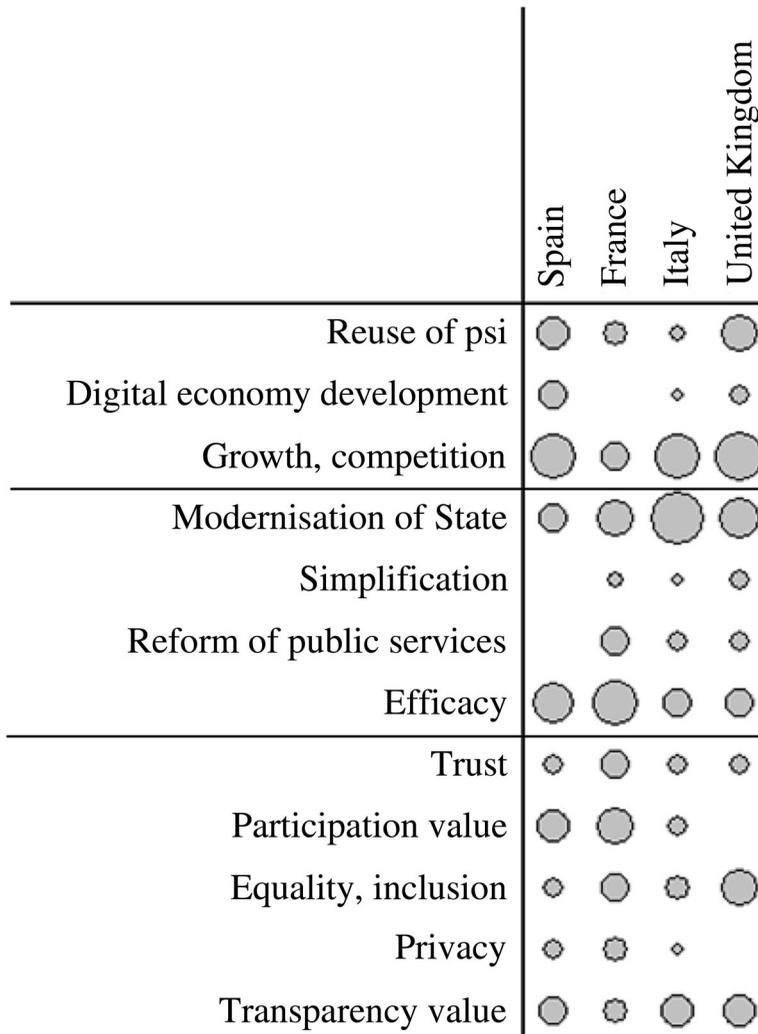
government generally pursues a public–private partnership policy. In Italy as well, programs for diffusion of infrastructure for ultra-broadband connection, digital literacy, and smart cities rely on public–private partnerships and we could not find any reference to concepts such as collaborative governance or circular subsidiarity (despite being mentioned in the Italian Constitution).

The variable of digital technologies offers similarities and differences among countries. Apart from France, which dedicates little discussion to Internet governance issues (abbreviated “int governance” in all figures), the main areas of implementation are e-services and the diffusion of networks and connectivity. Italy and the United Kingdom are particularly sensitive to the digitization of public services (35 percent and 36 percent, respectively), followed by Spain (17 percent) and France (19 percent); in all countries the services to be digitized first are health, justice, education, and local governance, but Italy and the United Kingdom have adopted a strategy of “digital first” or “digital by default” which draws within its remit interoperability, e-identity, and national coordination of digital administrations. Among the four countries, Spain is the most focused on issues about the diffusion of infrastructure (20 percent against between 4 and 7 percent in the other countries), whereas Italy and the United Kingdom highlight the need to improve the digital skills of the population in order to widen the use of digital services.

The analysis of frames also shows similarities and differences among countries (Figures 3 and 4; Table 7).

First of all, we found that the democratic frame (circled in red in Figure 4) is the least used in each one of the countries examined, except for France where it is the most frequent one (43 percent of coded segments); probably due to the specific French political culture (in particular the longstanding tradition of public debates, whose origins can be traced in the left-wing movement during the French Revolution, which regained strength after the French riots of 1968, and which are nowadays one of the pillars of the Fifth Republic). The promotion of trust, equality, inclusion, and the reference to the implicit value of transparency and participation permeates all French policies examined. Measures about digital public services are mostly motivated in France by the need to ensure equality of rights and inclusiveness (“the diversification and individualization of education allowed by digital technology open up new opportunities to reduce inequality and fight against the dropping out,” *Stratégie Numérique*, p. 21), whereas transparency, consultation, deliberation, and collaborative governance measures are linked to trust and the need to foster a relationship between citizens and institutions (e.g., “Accountability is needed to enhance transparency, restore trust and foster the quality of public policies,” French OGP Action Plan, p. 5).

In the other three countries, the democratic frame is present in initial, generic references to the intrinsic value of transparency and citizen participation in the life of the polity, and in discourses about trust, but it is rarely used to justify specific measures (in Spain 35 percent, in Italy 30 percent, in the United Kingdom 28 percent). This happens probably also because of the different levels of attention paid to issues such as public participation and deliberation, as already discussed.



**Figure 3.** Code Frequency of Frames Compared Between Countries (Own Elaboration With QDA Miner). *Note:* The size of bubbles depends on the code frequency (i.e., how many times a code has been assigned), showing the relative prominence of that code across all the policy documents of a country.

In particular, the Spanish and Italian governments are especially focused on restoring trust in institutions, compensating for scandals, corruption, and a general distrust which is typical in Southern Europe (“Fiscal transparency is one of the cornerstones of the pact between governments and citizens,” Italian OGP Action Plan, p. 13); transparency measures are motivated by the argument that they foster participation, that is, the ability for the public to monitor administrators’ activities and to become informed in order to participate in the public discourse, but nothing is said about the tools or the spaces to support participation and dialogue (“This initiative has two main purposes: it aims at

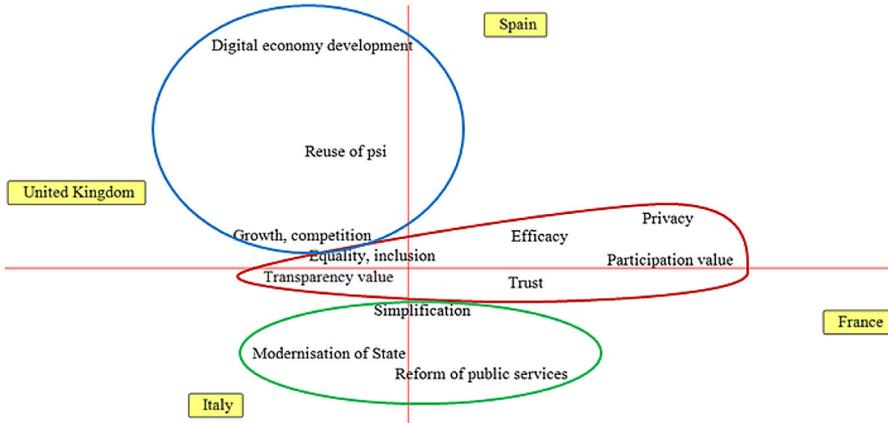


Figure 4. Clustering Countries According to Frames (Own Elaboration With QDA Miner).

spreading the use of *accesso civico* by public entities and increasing the efforts to enhance transparency, as total accessibility to all information on institutional websites of public administrations,” Italian OGP Action Plan, p. 11).

The economic frame (circled in blue in Figure 4) is predominant in the policies of both Spain (41 percent) and the United Kingdom (40 percent); the final aim of most measures is to improve economic growth and enhance the competitiveness of the whole country, or to foster the cost-efficiency of public sector. The most predominant motivation for Spanish policies is the promotion of economic growth, international competitiveness, and attractiveness for investors (22 percent); in all the policy documents analyzed, the economic frame is particularly stressed when motivating measures relating to transparency (“Administrations must be open and the citizenry should participate in decision making, actively collaborate in design, service delivery and evaluation of results through tools of transparency in order to monitor the efficiency in the use of public resources,” Spanish Digital Agenda, p. 34), but it is also present in the discussion of digital technology implementation in public services (“The reform of public administrations is an essential part of our reform plan and aims to configure an austere and efficient public administration, to be a competitive value for our country,” Spanish OGP Action Plan, p. 3), and the development of infrastructure, connectivity, interactivity, and e-literacy.

Table 7. Frame Comparison Between Countries (Percent of Code Frequency)

Frame	Spain	France	Italy	UK	All
Economic	41	22	36	40	34
Innovation	24	35	44	32	33
Democratic	35	43	30	28	33
Total of coded segments	100	100	100	100	100

U.K. policies are very focused on digital public services, whose approach can be summarized in two formulas: “digital by default,” which enhances cost efficiency of public services, improves its quality, and allows for a tailored service; and “open public services,” which refers to liberalization, public–private partnership, outsourcing, and contracting. In particular, the OGP Action Plan states that these policies have proven to reach “tangible benefits,” namely faster growth, cost-efficiency, efficacy, less corruption, and more inclusion (p. 3). At the same time, the efforts to open up data are both linked to transparency as a value to foster democracy and to the economic benefits deriving from their reuse by businesses (“This will deliver economic benefits for the UK and contribute to the UK government’s commitment to transparency and openness through a more open flow of data and information available for business and the public to scrutinize/analyze and re-use in products and services,” OGP Action Plan, p. 45).

In France the economic frame (22 percent) is mostly implied in the discourses about the modernization of state and collaborative governance but it is less activated than the other two. The aim of economic growth and competitiveness of French enterprises (9 percent) is present when talking about the digital reform of public services, while the development of the digital economy is at the center of the French Tech Initiative, a public–private partnership program to develop digital start-ups and “digital districts” all around the country. In Italian policies the economic frame (26 percent) often overlaps with the innovation frame, since the modernization of the state and the digitization of public services are considered as a driver for the economic growth, and are generally pursued through public investment programs and public–private partnerships.

The innovation frame (circled in green in Figure 4) is most used in French (35 percent) and Italian (44 percent) policies, although with slightly different patterns. Both governments frame the use of digital technology with the trend toward modernization of the state and simplification in order to enhance the efficacy of public action. In France digital public services and open data are the most prominent matters of reform (“The State is engaged in a radical data policy favoring the modernization of democratic practices, public action and the reinforcement of innovation opportunities for public and private actors,” OGP Action Plan, p. 40), but deliberative and collaborative procedures are also considered under a broader state innovation frame (“This reform has clear and ambitious aims: renewed trust in public action with more transparency, dynamic dialogue thanks to collaborative procedures that enhance the proximity of democracy, and the quality of services for citizens, enterprises and social actors,” OGP Action Plan, p. 5). The innovation frame is the most used in Italian policies; the attention paid to digital public services and transparency measures depends on the serious situation of the Italian society and economy, which falls in the lower cluster of European Union countries according to the Desi index (below the mean in every dimension considered).

Moreover, modernization means not only digitization of public services but also the use of consultations with multiple stakeholders (Italy) and collaborative governance (France). Finally, modernization is also linked to the general aim of

economic growth; especially in Italian policies, digitization and simplification of administration is conceived as a necessity to improve the general welfare of society ("modernization of public administration is required, starting from processes, overcoming the logic of technical rules and guidelines, and aiming at the centrality of user experience and satisfaction; an architectural approach based on open logics and standards, able to foster accessibility and interoperability of data and services," *Crescita digitale*). In Spain the innovation frame (24 percent) refers to the modernization of the State and the improvement of efficacy of public activity through the digitization of public services; at the same time, the modernization of the entire society goes hand-in-hand with the modernization and digitization of the state, and justifies infrastructural investments relating to values such as equality and inclusion ("It is difficult to conceive an advanced society in which almost one third of population does not benefit from digital development possibilities," Spanish Digital Agenda, p. 49). It also has to be noted that the Spanish Digital Agenda explicitly aims to reduce the digital access divide (seen as a reluctance to use digital public services), but does not specify how to achieve this goal.

### Conclusions

Our study helps to clarify the meaning of open government by examining policy implementation around the variables of transparency, participation, collaboration, and digital technologies, which constitute what we term the open government agenda. This study represents an innovative experiment because of the relative absence of previous research in the field and because of the particular research design; at the same time, it has some limitations to overcome through further investigation. The limited size of the corpus (three policy documents for each country, 12 in total), although justified by reasons of direct comparison, reduces the possibility of generalization. In addition, it is necessary to deepen the historical analysis of each country's background in order to describe path dependencies and evolutionary trends in more detail. By studying policy documents from Spain, France, Italy, and the United Kingdom we found that transparency and digital technologies are the most prominent issues in open government, whereas participation and collaboration are less considered and implemented.

This homogeneity can depend on a series of concurrent factors: first the time factor, in the sense that transparency can count on a longer tradition of implementation, notably in the field of access to information. A legal factor is the common background of those countries, which are all members of the European Union; the trend toward a policy convergence is sustained by the regulatory activity of European institutions, which is still more focused on transparency than participation. A technological factor resides in the opportunities of digital technologies, which are helping to enhance accessibility to information, the quantity of information, and widening the audience. And a final economic factor is clear in the frame used by all countries; data are considered as resources for economic growth and the development of new businesses.

The frame analysis has confirmed our hypothesis about what we have called the economic turn of open government; in particular, the scarce attention paid to participation and collaboration compared with transparency is reflected in the modest activation of what we have called the democratic frame, which incorporates references to democratic values such as participation, transparency, equality, inclusion, trust, and privacy rights. Although present in all the four countries, the economic and the innovation frames subdivide our case studies in two groups: Spain and the United Kingdom are mostly using the economic frame to justify their policies about open government, while France and Italy rely more on the innovation frame. Between those two, however, there is a substantive difference, because in France innovation is tied to democratic development, whereas in Italy it is tied to economic growth.

The significant presence of the economic frame in Spain and the United Kingdom does not mean that these countries are becoming similar in terms of open government policies, since they implement different measures. Moreover, they come from different administrative traditions. We can assume that the United Kingdom is adapting open government principles, by merging the old tradition of NPM (which in fact continues to exercise a linguistic hegemony in the official documents examined) with the Public Value approach (Benington & Moore, 2010), started in the Blair era and affirmed by Gordon Brown. The Spanish case shows instead how a different model of the state is adapting to austerity policies and how this makes open government converge with the NPM agenda; during the years of the economic crisis, the economy dominates many aspects of the public discourse, open government included, to the point that Spanish policies justify most measures in terms of development of growth and cost-efficiency.

The innovation frame is also coherent with NPM, in the sense that NPM has presented the rhetoric of efficiency as overlapped with the rhetoric of change (see also Margetts, Perri, & Hood, 2012), but it is developed in subtly different ways across the countries; in France, for example, the idea of innovation is framed in the democratic approach (with the idea of public administration as public value) and justifies measures about deliberation and collaborative governance. On the contrary, in Italy the innovation frame is mostly integrated into economic goals; this is partly due to the situation of severe economic crisis and unsatisfactory efficacy, but it is probably also part of a rhetoric of change (meant as efficiency and economic balance) used by the ruling class.

At the moment, the model of collaborative governance is hardly being implemented into national policies, and the open government agenda is still stuck in a concern with transparency measures. Notwithstanding, we could detect different perspectives and motivations for the adoption of open government measures that constitute the proof of a vital debate that is currently ongoing. In particular, we expect to see two main models of open government being discussed, adapted and changed in the next few years: on the one hand, the hegemonic model of open government seems to stress innovation and openness in the sense of an enhanced transparency, and occasionally of public-private

collaboration, while failing to achieve open decision making and thus continuing to neglect participation and deliberation. This has important implications for the future because it introduces a paradox in the implementation of open government; the economic lens, although softened by an emphasis on innovation, anchors the policy-making process in already-consolidated mechanisms, rather than in substantive change (De Blasio, 2016). On the other hand, we can foresee the emergence of a different perspective on open government, which provides a proper policy framework within which democratic innovations can develop; this is the case for a number of initiatives at the local, national, and regional levels (such as deliberative tables, digital democracy platforms, and collaborative projects involving academies, enterprises, and civil society at large in the governance process), that testify to the vibrancy of the relationship between citizens and the public administration in contemporary European democracies.

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### Notes

1. NPM is an approach to the economy and to the organization of the relationship between the state and the citizenry that stresses some of the propositions of classical liberalism, in particular the limitation of public intervention in the economy, pushing it toward more radical positions, such as the privatization of services and the transformation of all social relationships, including the concept of citizenship, by adopting an economic model (Crouch, 2011).
2. It is useful to note that the concept of “collaboration” is quite different from that of participation and “sharing.” Often used as synonyms, the three terms express three different concepts, albeit interrelated (for this important theoretical discussions, see Arena & Iaione, 2015; De Blasio, 2014; Raniolo, 2007; Saward, 2010; Sorice, 2014). The adoption of a clear distinction between the three concepts makes it possible to frame collaborative governance in the perspective of democratic innovations (Geissel & Joas, 2013; Smith, 2009).
3. As a point of reference, we can cite two official documents defining open government. In November 2009, European governments agreed on the Malmö Ministerial Declaration on e-Government, affirming that public administrations must be “open, flexible, and collaborative in their relations with citizens and businesses.” In December 2009, President Obama launched the Open Government Directive, of which “principles of transparency, participation, and collaboration form the cornerstone.”
4. The most important reason why NPM settled especially in United States and United Kingdom is that in these countries the economic neoliberal approach (a specific wing of the overall liberal ideology rooted in classical economic theory developed by Adam Smith, David Ricardo, and Robert Malthus, among others) has always been particularly strong. As Colin Crouch (2011) has explained, NPM is part of a neoliberal approach to the economy and to the organization of the relationship between the state and the citizenry that stresses some of the propositions of classical liberalism, in particular the limitation of public intervention in the economy, pushing it toward more radical positions, such as the privatization of services and the transformation of all social relationships, including the concept of citizenship, by adopting an economic model.

5. Notwithstanding, there are also some relevant exceptions: for example, the account by Margetts and Dunleavy (2013) for the persistence of NPM helped by austerity policies. Crouch (2011) and Roberts (2014) have also expressed a similar thesis.
6. The concept of circular subsidiarity (or collaborative administration) is intended to overcome the principle of vertical subsidiarity as used in multilevel and multi-actor governance models (typically, the European Union); according to this latter principle, in matters of shared competence the decisions must be taken as closely as possible to the citizen. In circular subsidiarity, the actors involved in the decision-making process are not limited to public actors but also to citizens and the private sector (Foster & Iaione, 2016; Iaione, 2016). Coherently with this framework, public-private-civic partnerships are a further development of public-private partnerships (so much used in the NPM perspective to establish collaboration patterns between public and private sectors) and describe all the forms of cooperation and collaboration among citizens, authorities, and enterprises in the management of common goods and the provision of services; examples of public-private-civic partnerships can be collaborative services, co-ventures, and co-production (Foster & Iaione, 2016; Iaione, 2016).
7. Although we acknowledge that NPM is a highly fragmented “cluster of phenomena” (Osborne, 2010) rather than a coherent doctrine, we use the Weberian concept of the ideal type to describe some prominent features of NPM.
8. The most similar/most dissimilar strategy has been developed in the framework of comparative politics by John Stuart Mill, and relies on two assumptions: according to the method of difference, comparing similar cases or systems is necessary to identify the independent variables, whereas the method of similarity consists in comparing different cases or systems to show the same result in terms of the dependent variables (Morlino, 2005).
9. The U.K.’s PSI Regulation and the Spanish law absorbing the European Union Commission’s directive on reuse of PSI came into force in July 2015, after the analysis was completed. For this reason, we took into our corpus the latest open data strategy published at the time of writing.
10. Digital Agendas and OGP Action Plans provide a detailed policy framework and a complete list of all the measures implemented by national governments in matters of open government and digital democracy, or that are planned for the future. For this reason, the analysis of these documents is particularly helpful to detect not only the motivations for the adoption of open government policies but also to connect the specific measures contained in fragmented pieces of legislation to the overall framework. They differ from each other because Digital Agendas are drafted by national governments autonomously, although following the model of the European Commission’s Agenda, whereas Action Plans are the result of a process of consultation with civil society organizations and are broader in scope. The only piece of legislation included in our corpus, the reuse of PSI acts, has been the first (and up until now, the only) binding legislation in the European Union that addresses the role of digital technologies in the government (see Directive 2013/37/UE).
11. The intercoder reliability was 94.5 percent.
12. It is important to note that counting the relevance of the codes in terms of percentage with respect to the whole text would have scarce reliability. The number of pages of the policy documents can vary, as well as the amount of space dedicated to each measure (for various reasons, e.g., editorial guidelines, figures, or tables), and ultimately the same word count can vary depending on the language. For this reason, we counted the relevance of code occurrences in absolute terms (i.e., how many times a code occurred).
13. This conceptual framework is visible also in the passage of powers from the former transparency monitoring authority to a more comprehensive anticorruption agency.
14. In 1995, the “Barnier law” on environment protection introduced public debate as a common practice for deliberative decision making in specific sectors (notably infrastructure, territory management and energy) and instituted a specialized Commission (later enhanced to the status of Authority). Currently the Commission is working to introduce digital procedures in the deliberative design and to extend the matters of deliberation.
15. See <https://ec.europa.eu/digital-agenda/en/implementation-public-sector-information-directive-member-states> (last accessed on 11/20/2015).
16. Figures 1 and 4 are the graphical result of a correspondence analysis run with the software QDA Miner. The closer two cases appear (in this case countries), the more they show similar patterns of code frequencies: in other words, the proximity on the plane stresses the degree of similarity among cases.

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