

Portal2EU: Improving EU Digital Public Consultations

PORTAL2EU

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Portal2EU: Improving EU Digital Public Consultations

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ABBREVIATIONS

AI	Artificial Intelligence	
API	Application Programming Interface	
BR	Better Regulation	
Commission	European Commission	
Council	Council of the European Union	
DG	Directorate-General	
EU	European Union	
EP	European Parliament	
HYS / Platform	'Have Your Say!' Platform (as of August 2023)	
IT	Information Technology	
NGO	Non-Governmental Organisation	
TEU	Treaty on European Union	



EXECUTIVE SUMMARY

'Have Your Say' ('HYS' or 'Platform') was introduced by the EU in 2015 to deepen its democratic legitimacy and enhance public participation. The Platform provides an opportunity for European citizens to engage in policymaking that impacts them. Although HYS remains a frontrunner in the use of public consultations (OECD, 2021), there are certain challenges that impede wider citizen engagement. To determine its impact on public engagement, the project team Portal2EU conducted an in-depth examination and evaluation of HYS, revealing three key dimensions in which it can be improved: accessibility, transparency, and outreach.

Regarding accessibility, several issues were identified. There are inconsistencies in the execution of accessibility requirements, potentially increasing the difficulty for certain groups to participate. The website's structure is complex, which could hinder some users from effectively engaging with the Platform.

Transparency issues include a lack of clear guidelines for users, leading to confusion and reduced engagement. Insufficient information creates ambiguity about decision-making processes and institutional responsibility. Moreover, there is no clear timeline for the feedback process. The user registration and authentication process poses further potential security risks.

In terms of outreach, many potential users are unaware of its existence or its purpose, limiting its effectiveness in gathering meaningful feedback.

To enhance the Platform's effectiveness, the Portal2EU team recommends several solutions. First, simplifying HYS's structure and features to make it more accessible to a broader range of users. Second, providing clear and straightforward user guidelines on the Platform to eliminate user confusion and achieve increased transparency. Finally, enhancing awareness among different groups of users to foster greater engagement. By implementing these recommendations, the EU can strengthen its democratic legitimacy and promote broader civic participation leading to more robust and inclusive decision-making processes.

INTRODUCTION

With Europe's Digital Decade,¹ the Commission clarified that engaging EU nationals in the digital public sphere is one of its top priorities.

In the digital target for 2030, the Commission stated that digital rights and principles should be solidaristic and inclusive and that "technology should unite, not divide, people. Everyone should have access to the internet, to digital skills, to digital public services and fair working conditions" (EC, n.d. a).

In spite of these developments, the EU is still perceived as suffering from a "democratic deficit," a shortcoming that even the EU itself acknowledges (EU, n.d. a).

While digital tools can help increase democratic legitimacy, the e-participation mechanisms the EU uses present certain challenges at the current stage of their development. Citizens' involvement should be encouraged on the same level as businesses and organisations through raising awareness and simplifying the means of participation. These are essential components for the functioning of democratic political systems. A democracy that lacks public engagement risks becoming irrelevant to the electorate, leading to a failure to address the needs and priorities of its citizens. Therefore, efforts to improve public participation in the digital sphere are of high relevance for building legitimacy and cultivating civic responsibility.

HYS was launched in June 2016 and has subsequently undergone several technical improvements.

In June 2022, the Commission announced its intention to transform the existing public consultation website into a onestop-shop for online civic engagement (EC, 2022).

The new portal will include an umbrella page leading to HYS, the European Citizens' Initiative, and the new citizens' platform built using the model of the Conference on the Future of Europe. The launch of the new umbrella page is expected in September 2023.

According to information gained from interviews with members of the Commission, no major improvements are planned on HYS in conjunction with the launch of the new umbrella page. This report thus offers timely solutions that are aimed at improving the democratic participation of citizens at the EU level. To this end, the challenges identified can be summarised in three overarching categories: accessibility, transparency, and outreach. The Portal2EU team's recommendations are based on the case study of HYS, desk research, textual analysis, and data gathered through interviews with policymakers and NGO representatives involved in digital democracy (see Appendix).

The implementation of the proposed solutions on HYS – one of the elements of the new onestop-shop platform – will allow policymakers to address the challenges to public participation in a comprehensive manner.

¹ https://commission.europa.eu/strategy-and-policy/priorities-2019-2024/europe-fit-digital-age/europes-digital-de-cade-digital-targets-2030_en.

'HAVE YOUR SAY!': CURRENT STATUS

Context

Based on Article 11 of the TEU (2010), EU institutions must give citizens and other interested parties the possibility to "make known and publicly exchange their views in all areas of Union action." Article 11(3) specifically makes the Commission responsible for organising public consultations on EU matters of concern for stakeholders. HYS is the primary digital tool for EU citizens to participate in that process.

There is no binding EU regulation that specifically addresses public consultations. The design of such consultations is covered by a series of internal and interinstitutional documents (COM, 2015; Interinstitutional Agreements, 2016; EC, 2021a; and EC, 2021b). For HYS, the 'Better Regulation Toolbox' ('BR Toolbox') and 'Better Regulation Guidelines' ('BR Guidelines'), published in November 2021, are of interest. Both documents further clarify the commitments under the 'Better Regulation Agenda' and provide details on stakeholder engagement on HYS, including consultations' strategy, activities, and outcome evaluations (EC, 2021a; EC, 2021b).

Further guidelines on participation can be found in the Feedback Rules (EC, n.d. b), which cover categories including unsuitable feedback, deadlines, the transparency register, and data and privacy. However, these guidelines are limited and lack details on how the assessment of feedback will be conducted. There are three stages that legislative initiatives undergo on the HYS:

Box 1: Stages of legislative initiatives

- 1) Preparation
- 2) Call for Evidence
- 3) Final adoption of the initiative by the Commission

At the preparation stage, the Commission notifies the public about the upcoming consultations on the specific initiative, and provides a basic summary. During the Call for Evidence, participants receive necessary information about the initiative and express their opinions: either by sending feedback through an open-ended field during the opening of the 'feedback period,' or by filling in questionnaires (through EU Survey - the Commission's official survey management tool) during the opening of the 'public consultation' phase. When this report refers to public consultations, it encompasses both modes of engagement. At the final stage, the output of the consultation is published for feedback with the aim of being summarised and presented to the EP and Council as a part of a legislative debate.

To take part in public consultations, the participants must register through the EU login system (i.e., e-mail and password) or social media (e.g., Facebook). They can, however, view the initiatives and search through them using multiple filters without registration. Upon submission of the entry, participants receive a confirmation of submission via email. The consultation's results, along with statistics on the category of respondent (e.g., private individual or NGO) and nationality, are shown in each consultation's webpage.

First-Hand Experience with 'Have Your Say!'

To understand the challenges and limitations of HYS, the Portal2EU team participated in the Call for Evidence phase for the 'European Disability Card' public consultation and provided feedback in their capacity as citizens in December 2022. The key findings are as follows:

Box 2: Key challenges and limitations of HYS

- There is no explanation on the website of how to engage with HYS except for the video explaining generally what the HYS is, published on the starting page of the Platform.²
- The Feedback Rules (EC, n.d. b) do not indicate detailed guidance on how to provide a contribution.
- The Call for Evidence for an Impact Assessment is a technical document, and no easily readable summary for the general public is provided.
- The authenticity of information provided during registration (e.g., name and country of origin) is not verified.
- Confirmation of the submission of feedback is the only communication received from the Commission. The Portal2EU team received no information about further stages. Rather than a default option, such information is only communicated upon subscription to the initiative.



2 https://ec.europa.eu/info/law/better-regulation/have-your-say_en.

'HAVE YOUR SAY!': CHALLENGES TO PUBLIC PARTICIPATION

Our desk research on the structure and features of HYS, together with first-hand experience with the Platform, revealed certain concerns regarding HYS. These concerns were confirmed through indepth interviews with relevant stakeholders (see Appendix). The identified challenges were clustered in the three following dimensions.

Box 3: Three pillars of analysis

- Accessibility: the website should be designed and created for all people, having a specific focus on the requirements for people with disabilities (Harper and Yesilada, 2008).
- Transparency: the information should be made available and the reasoning for disagreement with alternative opinions should be explained (EC, 2021b).
- Outreach: the EC should "ensure adequate awareness-raising and publicity, and adapt communication channels to the needs of all target audiences" (EC, 2021a).

Accessibility

Generally, online consultation platforms should be easily accessible and designed in a user-friendly way, which simply and quickly provides information on both their functioning and content. When designing a website, it is important to bear in mind user characteristics, such as perceived usefulness or ease of use, to ensure that users will accept and engage with the technology (Davis, 1989).

HYS does not meet the accessibility requirement in several aspects:

Looking for initiatives can be perceived as a complicated process. On the starting page, some initiatives are labelled as 'Highlights -' a discretionary process. However, when proceeding to 'All Initiatives,' the user is expected to use filters without an accompanying explanation. The categories selected for the filters require in-depth knowledge of the HYS procedure as adopted by the Commission and described in detail in a 600-page BR Toolbox.

The documents accompanying consultations, such as the Call for Evidence for Impact Assessment or Inception Impact Assessment, are provided by the responsible DG for information purposes only. They contain the details and evaluation of the proposal in a legalistic, sophisticated manner. Thus, citizens can rely only on the summary of the initiative, which is usually no longer than several sentences.

Moreover, the special Report 14/2019 (ECA, 2019) found that users consider questionnaires from the Platform lengthy, unclear, and (occasionally) containing technical jargon. The responsible DGs do not use a standard design for questionnaires. Furthermore, the design is frequently the same for every type of user (i.e., businesses or individuals), regardless of their impact on the consultation. The resultant information overload hinders users' ability to engage quickly and effectively with HYS.³

The documents that are provided at the Call for Evidence stage, such as the Impact Assessment, are usually translated into English. The same is

³ See, e.g., https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/13848-Industrial-carbon-management-carbon-capture-utilisation-and-storage-deployment_en.

true with regard to the short summaries and general layout of the page. The feedback that is provided by other participants, however, is not automatically translated by the eTranslation tool. As a consequence, not all citizens can be actively engaged in the deliberation.

Currently, the Commission uses eTranslation and ePoetry. eTranslation is a corporate tool widely used by the Commission that is supposed to deliver high quality translation. ePoetry is the internal system that connects and translates sections of information that are published on HYS. These tools focus on specialised legal translation. However, they are not reliably available across the Platform. Also, special focus should be placed on fairness and other ethical requirements regarding the models on which the translation tools are based.

HYS is located on one of the Commission's subdomains. The Accessibility Statement for the main domain⁴ of the Commission was published in July 2023, which partially acknowledged limitations to accessibility (EC, 2023). For the subdomain on which HYS is located, there is no accessibility statement and no explicit way to verify whether HYS is compliant with accessibility requirements.

Upon closer investigation, HYS does not offer sufficient accessibility options for people with disabilities. For example, it does not provide options for an adaptable font, monochrome view, or keyboard navigation assistant.

Transparency

The main transparency concerns our research identified mainly relate to limited information regarding ownership of initiatives, composition of participants, and the final use of feedback.

There are no clear guidelines on what HYS is, how to engage with it, or how to submit appropriate feedback. There are multiple documents that address these matters in a complex manner, such as the BR Guidelines, the BR Toolbox, and the Feedback Rules. For a general audience, however, learning about the process means looking into extensive information written in a legalistic manner. There are certain omissions that do not allow citizens to fully grasp the process. For example, the initiatives' factsheets do not contain information about the contact person. Citizens are therefore not aware of the DG responsible for the initiative or the IT management of HYS.

The timing of public consultations is inconsistent and often deviates from the BR Guidelines and BR Toolbox indication. For instance, the 'European Disability Card' feedback period, in which the Portal2EU team participated, was open for slightly over six weeks, contrary to the intended four weeks as outlined in the Call for Evidence for Impact Assessment (HYS, 2022). The reasons behind this extension remain unknown.

Furthermore, public consultations announced on the website during the planning phase are frequently postponed.⁵ While delays are normal in complex processes such as digital public consultations, when they remain unannounced and unexplained, they erode the Platform's overall transparency.

HYS allows registration and authentication with users' social media accounts. While this potentially simplifies access to HYS for citizens, it creates a risk of not knowing the true identity of the participants. Due to the increasing number of bots (i.e., software agents that communicate autonomously on social media), this might exacerbate the risk of misuse.

HYS does not have automated content moderation. Each DG responsible for each individual initiative is also responsible for upholding certain standards for input on the Platform. There is no dedicated web-content team or an external provider in charge of moderating content.

HYS lacks a centralised data visualisation and consultation space, with information instead spread across each initiative's own page. Users are thus unable to browse summarised outcomes across different consultations. In addition, public consultation data is not available on the official portal for EU Open Data.⁶

⁴ https://commission.europa.eu/accessibility-statement_en#compliance-status

⁵ See, e.g., 'Taking Car Rentals into Other EU Countries.'

⁶ https://data.europa.eu/en.

Outreach

HYS offers targeted engagement and a limited reach. The former is the result of the restricted accessibility, which makes the website easier to use for experts rather than the general public. The latter stems from a lack of public engagement regarding the Platform by the EU.

Relying on these preliminary findings, the Portal2EU team sought basic statistics to evaluate the rate of civic participation. For questionnaires, the statistics are available upon the closing of the consultation period. Although feedback statistics are provided per initiative, no overall statistics across HYS' initiatives are made available. Roughly estimated, for the period between 1 January and 30 June 2023, 15 initiatives on legislative acts were open for feedback. On average, 148 EU citizens and 2 non-EU citizens participated in these initiatives. The participation rate varies from 0 to 1,102 citizens per initiative. From the perspective of attention economy, i.e., the amount of attention an average user is willing to give to a particular stimulus, the attractiveness and ease of use of the Platform are critical factors (UN. n.d.).

Currently, the Commission is engaging with the Committee of the Regions to give greater visibility to HYS. There are, however, certain categories that deserve specific attention. They include marginalised groups, different age categories, and citizens of EU countries who traditionally show less interest in policy making (with Germany and Belgium being frequently overrepresented) (Hierlemann et al., 2022). Gender diversity should also be ensured.



IMPLICATIONS AND RECOMMENDATIONS

HYS constitutes a crucial foundation of Europe's Digital Decade promoting digital governance. Its launch and continuous development paved the way to broader participation of citizens in policy making. HYS is a tool with extraordinary potential for citizens to debate and discuss policies that affect their lives. However, the Platform suffers from several shortcomings that ultimately frustrate this goal. Technical and conceptual divergences reduce accessibility by making the Platform overly complicated for users. A lack of clear channels of responsibility and follow-up with the public creates a sense of opacity, and a broad segment of the European public remains unaware of the Platform. Ultimately, the Platform is a well-conceived tool, the effectiveness of which can be further increased by the implementation of several key improvements.

To further involve citizens in the process, the Portal2EU team proposes specific changes that will improve the accessibility, transparency, and outreach of HYS. These solutions cannot be implemented in isolation, as improving one of the dimensions will have an impact on the others. Thus, they should be taken in conjunction to maximise their effect on the improvement of the Platform. Improving HYS will address the broader challenge of increasing democratic participation and legitimacy in the EU to ensure that citizens are not only heard but also listened to (EC, 2022).

Conceptual and technical improvements will create a more useful and more frequented Platform, which will in turn enable greater civic involvement and an ultimately more responsive Commission capable of addressing public needs.

As the importance of digital tools increases, an effective digital public space is necessary to ensure that the EU remains connected to its citizens, and that they gain a sense of purpose in their interactions with it.





ACCESSIBILITY

Simplification Chatbot Automatic translation Accessibility toolbar External reviewers (1) HYS should be simplified to respond to the needs of ordinary participants. This includes creating readable summaries of supporting documents explaining the essence of the initiative in all EU official languages. The language used across HYS, including in the roadmap and filters, should be adjusted to minimise technical jargon. The filters should include a legend, which is understandable for participants without specialised knowledge.

(2) HYS should adopt a chatbot to assist citizens in navigating across the website and through individual policy initiatives. There are pre-existing open source tools, such as the chatbot source code⁷ developed by Citizens Foundation that could be effective in assisting people to navigate more easily through initiatives of interest. This is a hybrid solution that lowers the barriers for participation for users who lack specialised knowledge and experience on HYS.

(3) Additional automated translation tools should be used to improve the accessibility of the Platform. The eTranslation and ePoetry tools that are currently used by the Commission are suitable for translation of some legal information. However, the use of other AI-aided tools for participants' feedback and summaries of supporting documents would be beneficial. Their recommended usage should come with a framework and guidelines to mitigate the risks of bias, discrimination, or unfairness.

(4) The accessibility toolbar should be introduced on HYS to improve the access of participants with physical and mental disabilities. The toolbar would offer a range of functions to enhance user experience, including adjusting text size, grayscale, high or negative contrast, and choosing readable fonts, among others. To ensure information is easily understandable, the Commission can seek additional guidance on the Inclusion Europe website (Inclusion Europe, n.d.). Furthermore, presenting content in a combination of formats - textual, visual, or audio - facilitates easier processing and helps prevent cognitive overload (Mayer and Moreno, 2003). These alternative forms should prioritise security considerations.

(5) The Commission should adopt a certification of accessibility issued by an independent body. The Accessibility Statement of the Commission's main domain⁸ is prepared based on a review of a representative sample of web pages by the International Association of Accessibility Professionals (EC, 2023). The same mechanism should be implemented for the HYS subdomain. In addition, the external evaluation should be made publicly available for citizens' information. The platform 'otakantaa/dinåsikt.fi,⁷⁹ established and operated by the Government of Finland, may serve as an example of best practice in this regard.



⁷ https://github.com/CitizensFoundation/active-citizen/tree/master/models.

⁸ https://commission.europa.eu/accessibility-statement_en#compliance-status

⁹ https://www.otakantaa.fi/sv/tietoa-palvelusta/18/.



TRANSPARENCY

Comprehensive guidelines Centralised open data dashboard AI content moderation Bot prevention Consultation ownership (6) Comprehensive guidelines about HYS public consultations should be created. They should include essential information from the BR Guidelines and the BR Toolbox reproduced in simple language comprehensible to an average user. The Feedback Rules should be incorporated into the systematic document and include further detailed instructions. The World Bank Consultation Guidelines may serve as an example of best practice (World Bank, 2019).

(7) Additional fields should be included in the layout of the website. Each initiative should indicate the responsible DG and their contact, and they should be clearly visible within the comprehensive guidelines. The Government of Italy's platform 'ParteciPa'¹⁰ serves as an example of best practice. The layout of HYS should incorporate a mandatory field indicating the reasons for postponement or delay of the consultation. Although the level of disclosure is ultimately determined by the Commission, providing more accurate reasons will enhance the transparency of the consultations.

(8) HYS should be equipped with a centralised dashboard to allow users to visualise and consult open data about EU public consultations. The dashboard should display infographics about statistics and outcomes of consultations in a simple and user-friendly manner. This would allow users to apply multiple filters to visualise general trends and results both during and after consultations (e.g., participation over time, gender, age and geographic origin of participants, rate of inappropriate content, etc.). Several existing examples can serve as a foundation for designing the dashboard, for example, CitizenLab¹¹. CitizenLab's dashboard effectively gathers essential metrics, compiles useful insights, and generates actionable reports. Incorporating a similar dashboard into HYS would enhance transparency. This would also assist the Commission in pinpointing areas that necessitate improvement, such as identifying underrepresented groups requiring further outreach. In addition, the dashboard should be linked to the established EU Open Data portal to streamline access to its resources.

(9) The Commission should introduce AI content moderation tools. The use of automated tools could increase content moderation efficiency while reducing the human workload (Gillespie, 2020). Open-source initiatives such as 'The Perspective API'12 detect personal attacks and profanity instead of simply looking into specific word combinations. The most serious cases can be flagged by AI tools that assist with content moderation. In case of doubt, human moderators could step in to determine whether there is a violation of feedback rules. Careful consideration should be taken between precision and recall trade-off on the AI model chosen. In this line, tools should be built with consideration of responsible AI, fairness-by-design and ethical requirements. To assess the adoption of the AI tool carefully and safely, as well as prevent potential unwanted outcomes, the Commission might consider carrying out experimentation of the tool through a regulatory sandbox,¹³ in compliance with the AI Act (EU, 2021).

(10) Alternative bot-prevention tools should be implemented. A careful analysis of bot-related threats to the Platform should be undertaken. HYS might have identified political spam bots as high-risks, compared to pay bots, which may call for different requirements (Orabi et al., 2020). In this light, approaches to prevent and detect bots according to the risk should be implemented, such as CAPTCHA, IP rate limits, ID verification, 2FA authentication, specialised software, log analysis (García et al., 2014). It may also be useful to use new tools based on machine learning to highlight suspicious behaviour or content (Orabi et al., 2020). Nevertheless, no single approach can guarantee full security, and may not always be effective towards advanced persistent threats or sophisticated attacks.

¹⁰ https://partecipa.gov.it/.

¹¹ https://www.citizenlab.co/en-gb/platform-online-engagement-toolbox.

¹² https://perspectiveapi.com.

¹³ Regulatory sandbox: sandbox to facilitate the development and testing of innovative AI systems under strict regulatory oversight before these systems are placed on the market or otherwise put into service (EU, 2021).



OUTREACH

Collaboration with national institutions Targeted advertising Mobile app Female developers (11) The inclusion of disadvantaged groups should be increased through collaboration with national institutions. A good example for the Commission would be to consult projects such as Digital Czechia,¹⁴ organised by the Government of the Czech Republic to increase digital competences among the Czech population. Additionally, NGOs can provide their expertise to reach specific populations.

Digital literacy programs can play a crucial role in enhancing the digital skills of the elderly. Europe Direct, an EU contact centre directory present in all EU Member States, offers a promising platform for citizens to engage with digital initiatives, including HYS. Collaborating with other projects such as ICT4Elders,¹⁵ PROADAS,¹⁶ and Ageing in the Digital Age,¹⁷ which also focus on improving digital literacy, would provide added value.

With regard to youth, the Erasmus+ programme seeks to make participation in democratic life in Europe at the local, regional, national, and European levels easier for young people. Publicity for HYS can be achieved through advertising the Platform at Erasmus+ events and activities.

(12) Outreach to disadvantaged groups should be achieved through targeted advertising through social media and offline events. The Commission should promote the Platform using online advertisements on relevant social media and across EU channels and websites. This would be particularly relevant in enhancing women's participation in digital platforms and reducing the age disparity. Seniors and women should receive greater priority in targeted advertisements to facilitate increased click-through rates.

However, as people's attention span regarding online content remains limited due to information overload and social media echo chambers (Cinelli et al., 2021), such online outreach should be complemented by offline advertisements. Tailored efforts to inform people offline may consist of using one-way communication channels such as podcasts, radio or TV interviews, press releases in national media outlets, billboards with QR codes leading to HYS. This might be supplemented with two-way communication, including discussions and talks organised by local municipalities and neighbourhoods, universities, or voluntary associations.



(13) Engagement should be enhanced by introducing a mobile application for the Platform. As smartphones and their user interfaces have become mainstream technology, stakeholders can now interact more intuitively with apps (Vohland et al., 2021). Political participation processes are gradually recognising the advantages of utilising mobile applications. For instance, in 2018, UN-Habitat, in collaboration with Colab, launched a platform that allowed Brazilian citizens to provide feedback on their cities' living conditions (UN-Habitat, 2018). This partnership also offered citizens the option to use a mobile application.

Implementing mobile applications requires a robust framework. A study of the Flashpoll application, which enabled citizens to provide feedback on urban development matters, revealed that while the use of mobile applications generally enhances participation, complementary outreach techniques are necessary to ensure widespread adoption. These techniques include raising awareness about the process, motivating participation, and addressing security and privacy concerns (LSE, 2015).

¹⁴ https://digitalnicesko.gov.cz/vize/.

¹⁵ https://www.ict4elders.eu/.

¹⁶ https://proadas.eu.

¹⁷ http://digitalageing.eu.

(14) Gender diversity and equity should be improved by including more female developers in the team. The imbalances of design created by male-only developer teams (Burnett et al., 2016; Rowan and Dehlinger, 2012; Nunes et al., 2023) represent a long-standing issue (Keuchler et al., 2012; Hsu, 2012). The IT management of HYS should encourage more female developers to join the team by actively showcasing the job possibilities workers have. This could be achieved by collaboration and consultation with EUGAIN,¹⁸ or Czechitas¹⁹ to provide complementary IT training. This training could be adapted to address women's use of digital tools and identify barriers to women's participation in digital platforms.



18 European Network for Gender Balance in Informatics, https://eugain.eu.19 https://www.czechitas.cz/en.

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APPENDIX

Between June and August 2023, the Portal2EU team conducted 11 in-depth interviews (Table 1). The interviewees consisted of representatives from different stakeholders involved in the management of HYS or digital participatory democracy in Europe (e.g., EC staff members, IT providers). The interviews were predominantly semi-structured with questions changing slightly depending on the interviewee.

No.	Organisation	Date
1	Citizens Foundation	07/06/2023
2	EC (DG for Communication)	16/06/2023
3	EC (Secretariat-General)	19/06/2023
4	EC (DG for Communication)	19/06/2023
5	Government of the Czech Republic	20/06/2023
6	EP (Secretariat-General)	28/06/2023
7	EC (Secretariat-General)	05/07/2023
8	Open Source Politics	07/07/2023
9	Government of Italy	21/07/2023
10	Consul Project	26/07/2023
11	Czechitas	01/08/2023

Table 1. List of Interviews (June - August 2023)

Furthermore, a masterclass about AI content moderation was delivered to the Portal2EU team by the head of content moderation of a non-EU Big Tech company (19/05/2023).