

Contents lists available at [ScienceDirect](https://www.sciencedirect.com)

Government Information Quarterly

journal homepage: www.elsevier.com/locate/govinf

Exploring FOI publicity patterns: The case of Italian municipalities

Lorenzo Cicatiello^a, Elina De Simone^b, Fabrizio Di Mascio^c, Giuseppe Lucio Gaeta^{a,*},
Alessandro Natalini^d, Ben Worthy^e^a Department of Human and Social Sciences, University of Naples L'Orientale, Italy^b Department of Economics, University of Rome Roma Tre, Italy^c Interuniversity Department of Regional and Urban Studies and Planning, University of Turin, Italy^d Department of law, economics, politics and modern languages, Libera Università degli Studi Maria Ss. Assunta di Roma, Italy^e Department of Politics, Birkbeck College, University of London, UK

ARTICLE INFO

Keywords:

Right to know
Cluster analysis
Transparency
Open government
Freedom of information

ABSTRACT

This paper aims to study FOI publicity implementation patterns by Italian municipalities' (<30,000 inhabitants). The analysis relies on data collected through an original survey of the municipalities' websites. Data allow inspecting the information that local governments disclose about the procedures for the presentation of FOI requests and how the FOI requests received in the past were managed. Cluster analyses reveal that the municipalities are rather heterogeneous in managing FOI publicity. Some of them provide full disclosure of relevant information; instead, others show non-compliance with the guidelines issued by the Italian central government. Regression analyses suggest that municipalities' size and income positively correlate with more elevated publicity. Civic capital is also positively connected with information about the procedures for presenting FOI requests. Factors affecting the demand for information about FOI, such as education and access to the internet, do not seem to be linked with publicity patterns.

1. Introduction

Just as information and communication technologies have made it easier for citizens to access government information that is proactively published on official websites, so too have they made it easier for governments to release information that promotes awareness of the rights Freedom of Information (FOI) laws grant to citizens.

Scholars have pointed out that this awareness is a key driver of FOI use or neglect (Camaj, 2016; Holsen & Pasquier, 2012; World Justice Project, 2015). Because FOI laws are a valuable good governance tool only if they are engaged and used (Schnell, 2020), it is essential that public bodies spread information about the FOI right, the procedures to exercise it, and performance data on the operation of FOI. Enhancing FOI publicity also advances the creation of a wider openness ecosystem, in line with the shift in transparency priorities brought by the rise of the open government paradigm (Berliner, Ingrams, & Piotrowski, 2018; Darbishire, 2010; Kreimer, 2018; Meijer, 2009;). The implementation of such FOI publicity—or “transparency of transparency” (Villeneuve, 2014, p. 556)—is as essential as transparency itself and may come in heterogeneous forms, which shape the effectiveness of FOI laws.

Surprisingly, there has been little to no empirical investigation of FOI laws' publicity (Villeneuve, 2014). Italy is an interesting case study because the FOI law was only recently introduced amid an increasingly crowded field of transparency initiatives (Savona & Simonati, 2019). Our research goal is to determine whether Italian municipalities implement FOI publicity in a homogeneous way, and if not, whether the heterogeneous implementation of publicity follows recognizable patterns – i.e., regular and detectable models. For this purpose, we analyzed data collected through an original survey of the official websites of Italian municipalities reporting more than 30,000 inhabitants ($n = 307$) and investigated how they disclose information about the FOI right, its related procedures, and performance data. Focusing on municipalities allowed us to see the sites where most FOI requests are made, because in many countries, FOI use is heavily oriented toward local government and is primarily a local phenomenon (Worthy, John, & Vannoni, 2017).

We carried out the empirical investigation using a hierarchical cluster analysis (HCA) that identifies municipalities' behavior in disclosing two sets of information concerning (a) the general FOI framework and FOI framework and procedure and (b) previously received FOI requests and their management. According to our results,

* Corresponding author.

E-mail address: glgaeta@unior.it (G.L. Gaeta).<https://doi.org/10.1016/j.giq.2022.101678>

Received 3 March 2021; Received in revised form 24 January 2022; Accepted 24 January 2022

0740-624X/© 2022 Published by Elsevier Inc.

the behavior of Italian municipalities follows one of the four FOI publicity patterns: (a) noncompliance with guidelines issued by the central government; (b) strained compliance, which is limited to the primary requirements sketched by the guidelines; (c) administrative compliance, which fulfills the majority of the requirements; and (d) maximized compliance, which ensures the full disclosure of information. We then relied on regression analyses to investigate whether socioeconomic characteristics of municipalities explain such heterogeneity of FOI publicity patterns. Our estimates confirmed that socioeconomic conditions and social capital may play a role in conditioning municipalities' disclosure of FOI-related information.

The remainder of the paper proceeds as follows. In Section 2, we describe the context of our research by providing an overview of the evolution of access-to-information legislation in Italy. In Section 3, we situate our research within the expanding literature on access to information and illustrate our research design. Section 4 presents the data used in our empirical analysis. Section 5 is articulated into subsections that present the method used to investigate the Italian municipalities' FOI publicity patterns and the findings obtained through our analysis. Section 6 illustrates the methodology and findings of our analysis of the determinants of municipalities' heterogeneity in terms of FOI publicity patterns. Finally, in the concluding section, we discuss the analytical and practical implications of our results.

2. Transparency reforms in Italy (1990–2016)

The principle of transparency was not introduced in the Italian Constitution of 1948, whereas the need for confidentiality to protect the public interest was clearly set out. Until 1990, the general rule was secrecy as a principle of administrative action and a duty of civil servants. Initially, transparency was implemented only by means of the Administrative Procedure Act (L. n. 241/1990; It.). This first form of transparency required the applicant to demonstrate a personal, concrete, and current existing interest, related mainly to the need to access administrative documents to bring a claim before a court. This requirement effectively prevented democratic control over the action of public administration because requests for access aimed at monitoring the activity of public authorities were not admissible (Savona & Simonati, 2019). Furthermore, public authorities were not required to provide reasons for refusing requests.

Starting from 2005, the proactive disclosure of information via electronic means became the dominant form of transparency, alternative and concurrent with the one grounded in access to administrative documents. A sequence of provisions (D.Lgs. n. 82/2005; D.Lgs. n. 150/2009; D.Lgs. n. 33/2013; It.) mandated the publication of a set of information within a dedicated section (Transparent Administration) of the official websites of public authorities. In particular, Legislative Decree 33/2013 (It.) introduced a new right of access to information subject to mandatory disclosure when public authorities fail to publish it.

The implementation of Legislative Decree 33/2013 revealed the shortcomings of the Italian system for proactive disclosure: On one hand, it mandated the release of an ever-increasing amount of data, thus generating a disproportionate burden for public authorities; on the other hand, it denied citizens a general right to access (Di Mascio, Natalini, & Cacciatore, 2019). In reaction to pressure from the media and activists over the implementation of transparency provisions, Legislative Decree 97/2016 (It.) introduced the right of private parties to access data and documents that are not compulsorily made public. This form of transparency is modeled upon typical FOI legislation even if it does not provide for external review, meaning that independent oversight bodies play no role in the review of unjustified denials of requests. The Italian legislation entrusts only one independent body, the National Anticorruption Agency (ANAC), to issue guidelines for the implementation of the legal framework on civic and generalized access.

The ANAC issued the guidelines with Resolution 1309/2016 (It.). In

these guidelines, the traditional right of access introduced by Law 241/1990 (It.) is called “documental access” and access to information subject to publication obligations is called “simple civic access,” whereas the new access introduced by Legislative Decree 97/2016 (It.) is referred to as “generalized civic access.” This complex terminology corresponds to the fragmentation of the legal framework in which the three forms of transparency coexist, as reported in Table 1. In the guidelines, the ANAC invited single public authorities to adopt specific regulations to clarify how the multiple rules on access to information are applied within their organizations. It also suggested introducing a central bureau to oversee transparency within each public authority to ensure coordination of the multiple forms of access.

The coexistence of the three forms makes the right to access information obscure to the citizens, who often do not know what is the appropriate legal tool to use (Carloni & Giglioni, 2017). To make the issue more complicated, the Italian government has not committed to the creation of a consolidated portal, which would allow for the online submission and tracking of requests. This means that each administration enjoys autonomy in the identification of the offices receiving requests and in the publication of details about the three forms of access. To ensure a minimum level of consistency for the publicity of information on the three transparency tools across public bodies, the ANAC issued a second set of guidelines with Resolution 1310/2016. These guidelines mandated the publication of a semiannual register, reporting information about caseloads and processing times for the three transparency tools. They also clarified that regulations and registers were to be published in a specific subsection of the “Transparent Administration” section dedicated to the right to information on the authorities' websites. Forms for submitting requests and contact information were also to be published within this specific subsection.

However, the ANAC oversees the fulfillment of hundreds of legal obligations to publish information on official websites under Legislative

Table 1
Forms of access to government information in Italy.

	Documental Access	Simple Civic Access	Generalized Civic Access
<i>Legal Basis</i>	Law 241/1990	Legislative Decree 33/2013	Legislative Decree 97/2016
<i>Applicants</i>	Citizens who demonstrate a personal, concrete and current existing interest corresponding to a legally protected position	Any citizen who must not give reasons	Any citizen who must not give reasons
<i>Object of the request</i>	Information that is embodied in a pre-existing document	Documents and data that must be published in official websites	Any document and data if exclusions and limitations do not apply Office holder of data and documents, Office for the Relations with the Public, any other office identified by the administration
<i>Request addressed to:</i>	Public authority holder of the document	Transparency Officer	
<i>Decision</i>	No duty to give reason within 30 days	Duty to give reason within 30 days	Duty to give reason within 30 days
<i>Private parties owners of personal information</i>	Involved	Not involved	Involved
<i>External review by Independent Oversight Body</i>	Yes Oversight Body: Commission for Access to Documents (CADA)	Yes Oversight Body: National Anticorruption Agency (ANAC)	No Only internal review by the Transparency Officer

Decree 33/2013 (It.). This means its very limited resources are dedicated to monitoring the disclosure of information on the right of access as mandated only by soft law. Only one monitoring campaign has been conducted so far, focused on a small sample of 124 national and regional authorities in 2017. It highlighted that 48% of the authorities included in the sample had not published the register. When the other authorities published the register, it often suffered from deficiencies with regard to being complete and up-to-date (ANAC, 2018).

To address this implementation gap, the Ministry for Public Administration issued further guidelines on the disclosure of information concerning the generalized civic access. Circular n. 2/2017 (It.) recommended the publication of forms for submitting requests and appeals in the specific subsection on the right to access. Circular n. 1/2019 (It.) reiterated that public authorities were expected, at the least, to publish forms for submitting requests. It also provided for operational instructions on the implementation of the registers. Regarding the monitoring activity, the Ministry for Public Administration has targeted only ministries, regions, and the largest cities focusing on the performance of generalized access (i.e., number of requests that are granted). It is worth noticing that no sanctions have been imposed on municipalities failing to disclose FOI-related information as central bodies have not been granted with binding powers. Furthermore, the central government has not developed programs to help municipalities implementing publicity about FOI by providing technical and professional advice.

Overall, the Italian system suffers from the fragmentation of the forms of transparency and it does not provide a setting where we can expect to find an impact from central government coercive and collaborative strategies on local government transparency. Both the ANAC and the Ministry for Public Administration have maintained that the disclosure of information about the three forms of transparency in a specific section of official websites would serve as an antidote to the complexity of the regulatory framework. However, the disclosure of this information has been regulated by soft law tools with no proper enforcement and guidance. Therefore, it is not surprising that when the ANAC (2020) and the Ministry for Public Administration (2020) launched two recent public surveys on the transparency policy, the respondents highlighted the persistent confusion and uncertainty about the use of the three transparency tools.

3. Related literature and research design

One of the indicators frequently cited when assessing whether, and to what extent, the objectives of a FOI law are being achieved is the number of requests made under the law. Although FOI laws are broadly similar across countries, the number of requests varies considerably from one country to another in a given year and the evolution of usage is dissimilar. A likely reason for low request numbers is the lack of effective promotional measures, which are aspects of FOI legislation often missed but as important as access rights (Hazell, Worthy, & Bourke, 2009; Holsen & Pasquier, 2012). Promotional efforts include FOI publicity on public administrations' websites, which have become essential vectors of information regarding government and its services (Villeneuve, 2014). This form of electronic publicity can have several positive effects on the administration of FOI laws:

- internally, as a signal of an organization's internal commitment to and awareness of the law and the organization's willingness to obey it.
- internally, in helping to reduce costs and inefficiencies—especially when citizens are not able to submit their requests correctly.
- externally, in making the FOI process more transparent and easier to use.
- externally, in helping create awareness of the law.

There is evidence for each of these effects. Experiments using

requests in England, replicated in the Netherlands and elsewhere since, found that FOI requests work better than informal routes to open up bodies and can be a force for encouraging publication, even beyond what the law asks (see Grimmelikhuijsen, John, Meijer, & Worthy, 2018). The publication of other data, such as past requests, can promote proactive disclosure and may, in some cases, even reduce request numbers (Sunlight Foundation, 2018). Awareness is also vital in making FOI work. A global survey in 2015 found fewer than 40% of those surveyed in various countries were aware of their information rights. There appears to be low to very low levels of awareness of laws across many European countries, from Albania to Switzerland, which has a detrimental effect on the use and support of FOI (see Camaj, 2016; World Justice Project, 2015).

Nevertheless, some of these features can determine proxy effects and may present trade-offs. For example, publicity could only be a result of some parts of an organization embracing transparency, because even multiple areas within single bodies can hold very different views (see Piotrowski & Van Ryzin, 2007). Similarly, website awareness could well be a sign of an organization following the letter rather than the spirit of the law, fulfilling obligations, or simply box ticking (see Richter & Wilson, 2013). Openness can be a complicated process, and organizations can engage in various strategies to mitigate or manipulate its effects, even while outwardly complying (Heimstädt, 2017; Heimstädt & Dobusch, 2018).

Added complexities arise from the fact that FOI is increasingly part of a wider, changing legal and technological landscape. FOI should not be viewed in isolation but as part of a whole range of mechanisms and laws that now promote openness, from open data to procurement legislation (Kreimer, 2018). The implementation of an FOI law is complex, and common challenges may include difficulty in adjusting the mindsets of bureaucrats who hold the information; a lack of capacity in record keeping; insufficient resources and infrastructures; inadequate staffing; and a lack of incentive systems (Neuman & Calland, 2007). However, together with these characteristics, it is well-known that sustained demand for access to information through the FOI law is a crucial ingredient for its effective implementation (Neuman & Calland, 2007; Piotrowski & Van Ryzin, 2007). Scholars have also highlighted several barriers to the demand for information, from people's simple lack of awareness of their rights to more practical problems stemming from the lack of instructions on how to file an information request (Roberts, 2010).

To examine this wide range of FOI implementation challenges, our study focused on the case of Italian municipalities. More specifically, we observed how these municipalities publish on their websites the general information about the FOI framework and procedure and the information concerning performance in managing FOI requests. Our choice to process the two elements (FOI framework and procedure and performance in managing FOI requests) separately was based on the importance of both these elements for expanding the amount of information provided (Sunlight Foundation, 2018) and was due to the structure of the Italian national FOI law, which governs the two aspects in separate articles. To evaluate the publicity of information on FOI framework and procedure and performance in managing FOI requests, we used the Italian national FOI guidelines (see paragraph 2) as a benchmark.

Our analysis proceeded in three steps. First, we built a database that allowed the observation of FOI-related information provided through the local Italian governments' websites. Second, by means of an HCA, we analyzed possible patterns of FOI publicity concerning (a) the general FOI framework and procedures for the presentation of FOI requests and (b) the disclosure of performance data on operation of FOI. Third, we determined the correlation between the publicity level and conditioning factors such as the municipalities' socioeconomic profiles.

Our theoretical expectations on publicity patterns built on Roberts's (1998) and Snell's (2001) models of administrative compliance and on Pasquier and Villeneuve's (2007) typologies of administrative behavior. Roberts (1998) argued that administrative compliance in FOI regimes

can be divided into three categories: malicious noncompliance, adversarialism, and administrative noncompliance. Malicious noncompliance is a combination of deliberate actions designed to undermine access to records. Adversarialism can be described as a practice of testing the limits of FOI laws without engaging in obvious illegalities. Finally, administrative noncompliance concerns those practices that undermine the right of access because of capacity shortages in public administration. Snell (2001) added two further dimensions to Roberts' (1998) basic model: administrative compliance, in which requests are handled in a cooperative fashion ensuring timely decisions; and administrative activism, in which public authorities give high priority to processing requests because they aim to ensure the maximum release of information, even beyond the borders of FOI legislation.

Pasquier and Villeneuve (2007) identified four forms of behavior when public administrators are confronted by laws on access to information: averted transparency, which corresponds to public authorities who actively and illegally prevent access to information; obstructed transparency, which corresponds to the use of all legal means to limit access to information; strained transparency, which refers to the inability to cope with transparency provisions due to a capacity gap; and maximized transparency, which occurs when public authorities make all the information in their possession available (pp. 149–150).

Drawing on Villeneuve (2014), we focused on compliance with guidelines on the release of information about FOI as measured by analyzing public authorities' official websites. This means that our analysis could not assess how FOI is operating in relation to different types of requesters and types of information requested. In other words, we could not analyze how the various legal means are implemented to limit access to information. This led us to exclude from our analysis categories such as malicious noncompliance, adversarialism, and obstructed transparency, which require a sophisticated assessment of the driving forces behind the public authorities' behavior.

Rather, we focused our analysis on the broad category of noncompliance, which refers to the municipalities' failures to comply with national guidelines on the disclosure of information about FOI. We then included the category of strained compliance, in which municipalities comply with a minority of the guidelines. Although this is sometimes deliberate, for example, delaying publication in such a way that information loses its relevance, it is also often due to organizational problems linked to insufficient capacity (Pasquier & Villeneuve, 2007). Drawing on the work of Snell (2001) and Pasquier and Villeneuve (2007), the last two categories we considered highlight the difference between legalistic and goal-oriented compliance: On one hand, administrative compliance implies that public authorities fulfill the primary requirements for the sake of following the rules; on the other hand, maximized compliance implies that all information about FOI is made available because it demonstrates a public authority's engagement with the broader societal goal of transparency. Looking further afield to the wider regulatory literature, these last two categories also resonate with the distinction between rule compliance and substantive compliance (Parker, 2002).

Previous research has highlighted that, despite similar requirements, local administrations are highly heterogeneous in terms of FOI publicity (Villeneuve, 2014), because a number of factors influence local authorities' openness (e.g., Albanese, Galli, Rizzo, & Scaglioni, 2021; Berliner, 2014; Sáez-Martín, López-Hernández, & Caba-Pérez, 2019; Tejedo-Romero & Araujo, 2020). Drawing upon this empirical literature, we build an explanatory model that includes a number of variables that may be expected to determine FOI publicity patterns among Italian municipalities.

4. FOI publicity data

Our analysis covered all Italian municipalities with more than 30,000 inhabitants in 2019. This population-size threshold implies the analysis of the websites of only a small share of Italy's municipalities (307 out of 7978). Nevertheless, the selected municipalities account for

almost half of the entire Italian population. Further, smaller municipalities may lack the resources and capacity to publish online all the information the law requires (Bearfield & Bowman, 2017). The complete list of the municipalities in the sample is included in the Appendix, and Table 2 shows the municipalities' numbers by class sizes and by distribution across Italian macroregions.

We analyzed the official websites of the selected municipalities during a period of 2 weeks (15–30 July 2019). Our focus was on the Civic Access subsection of the “Transparent Administration” section of the municipal website, where all the FOI-related information must be disclosed according to ANAC guidelines. The information provided was grouped into the following two subsections.

4.1. Group A: publicity about FOI general framework and procedures

Exploiting the FOI regulation implies being aware of having the right to access information and knowing the way an FOI request might be formulated (Holsen & Pasquier, 2012). Therefore, we checked whether municipalities complied with ANAC guidelines in publishing the following five elements: (A1) any municipal regulation that describes FOI and the local procedures for accessing information; (A2) any content devoted to basic FOI information and guidelines, which is intended as specifically designed for the web and written in a nonbureaucratic form; (A3) at least one contact detail for sending FOI requests; (A4) an FOI information request form; and (A5) an appeal form to ask for the reexamination of a decision on an FOI request. The data collected by inspecting municipalities' websites were coded into five binary variables, taking the value of one in the case when the corresponding element was found to be available.

4.2. Group B: publicity about municipalities' performance in managing FOI requests

According to the ANAC, publishing information about FOI requests allows citizens to monitor the performance of FOI operation and, at the same time, promotes learning and consistency in the application of FOI principles to similar requests.¹ In an effort to achieve these goals, ANAC guidelines require public administration to publish information on caseloads and processing times in a register, which is easily searchable and regularly updated on administrations' websites. Municipalities' websites were inspected to check the following: (B1) whether any register of FOI requests had been published; (B2) whether this register had been updated (at least to December 2018); (B3) whether it links the requests to the municipality's corresponding reply; and (B4) whether the register ideally allows to disentangle FOI requests (if any) from the other two types of requests (i.e., simple civic access and documental access; see Table 1). The data collected by inspecting the municipalities' websites were coded into four binary variables, taking the value of one when the corresponding element was observed. Taken together, these

Table 2

Italian municipalities included in the analyzed sample by population size and by macro area.

	North	Center	South and Islands	Total
Between 30,000 and 50,000	61	37	65	163
Between 50,000 and 100,000	26	22	51	99
Between 100,000 and 250,000	17	6	10	33
More than 250,000	6	2	4	12
Total	110	67	130	307

¹ See the Italian Ministry of Public Administration's *FOI Frequently Asked Questions* published at the following web address: <http://www.funziopubblica.gov.it/faq-del-FOI> [last accessed 6/4/2019].

variables provide a complete description of disclosure of information about FOI requests.

For each municipality in our sample, data for the two groups of variables were collected by two coders, who worked independently. First, the information the ANAC recommends publishing was used to build a coding matrix. Then each coder performed a first analysis of 20 randomly extracted websites to revise and adapt the coding matrix. As a result, the intercoder agreement of the final coding resulted in a Cohen's average kappa of 0.85, in line with previous studies on transparency (e.g., Bearfield & Bowman, 2017; Bizzo & Michener, 2017; Worthy et al., 2017). Finally, we reconciled the few remaining differences across inconsistent codes by going back to each specific item and coding the websites again to verify accuracy (Feeney & Brown, 2017).

Table 3 describes all the variables and displays summary statistics. Based on the variables of Group A, it is worth noting that 35% of the municipalities published a formal regulation on generalized access, whereas 51% disclosed information regarding the FOI framework and procedure on the website. The two categories are not mutually exclusive (i.e., some municipalities had both regulation and information on their websites).

5. Examining FOI publicity patterns

5.1. Methodology

Cluster analysis is an explorative data-analysis technique aimed at building a classification of similar observations (i.e., municipalities, in our case) into different homogenous groups. It is widely used in many branches of academic research for hypotheses classification, generation, and testing and for generally discovering groups in the data (Everitt, Landau, Leese, & Stahl, 2011). Furthermore, it has also been applied by previous transparency studies (e.g., Bastida & Benito, 2007; Benito & Bastida, 2009).

Such a technique suited our investigation, because it allowed us to see whether groups of municipalities follow distinctive patterns in the implementation of FOI publicity, according to our theoretical expectations on possible forms of compliance (see Section 3). Cluster analysis is a three steps process.

First, the researcher has to choose whether to use partition or hierarchical analysis. The former requires the researcher to rely on a priori knowledge of the number of clusters that can stem from a theory or observation. In contrast, HCA identifies several clusters via an iterative

process. Because we did not have any a priori knowledge on the number of clusters, we relied on an HCA.

Second, the researcher has to rely on a synthetic coefficient that measures similarities and dissimilarities among observations. This choice depends on the nature of the variables included in the analysis and on what kind of similarities the researcher wants to magnify. The bivariate nature of the variables used in our investigation was accounted for with the adoption of a Jaccard (1901, 1908) binary similarity coefficient. This choice allowed us to emphasize the similarities between municipalities with all-zero variables, which represent the only group we can define a priori as noncompliers.

Third, an agglomerative criterion is needed to define whether the cases are similar enough to be included in the same cluster. Our analysis used Ward's (Ward Jr., 1963) agglomerative method. According to this method, the two cases that result in the minimum increase in the error sum of squares are joined to form a group, then the closest pair of groups is combined into a larger group, and the process continues until all the cases are included in one cluster. Therefore, this process created a hierarchy of nested clusters of municipalities that share similar features and were different from those contained in other groups.

The hierarchical cluster method ultimately requires a decision on the number of clusters to be created. Previous research highlighted that such a choice necessarily involves the researchers' subjectivity (Bastida & Benito, 2007) and that the final classification should be judged on its usefulness (Everitt et al., 2011). Therefore, we identified the final number of clusters to be as synthetic and informative as possible. This choice led us to discard bipartitions and classifications with too large a number of clusters. However, we performed a set of analyses of variance to provide a robust test of the significance of the clusters' heterogeneity.

We performed two HCAs; the first one was carried out on the variables measuring the publicity of information concerning the general FOI framework and the procedures for the presentation of FOI requests (the variables of Group A). The second one was carried out on the variables providing information about the municipalities' disclosures of information concerning past FOI requests (the variables of Group B).

5.2. Patterns of publicity about FOI general framework and procedures

Table 4 presents the results obtained through the cluster analysis on variables of Group A. The analysis identified four clusters (indicated by the A1–A4 codes), namely four distinct patterns of information disclosure.

Table 3
FOI publicity features on the Italian municipalities' official websites – descriptive statistics.

Variables' label	Description	N	Mean	Variance	S. D.	Compliers (n)
Group A: elements that illustrate the FOI general framework and the procedures for submitting FOI requests.						
Hard law or soft law	Binary variable that takes the value of 1 for those municipalities whose website displays information about FOI through a hard or soft law act	307	0.352	0.229	0.478	108
Web content	Binary variable that takes the value of 1 for those municipalities whose website displays information about FOI through dedicated web content	307	0.511	0.251	0.501	157
Contact detail(s)	Binary variable that takes the value of 1 for those municipalities whose website displays at least one contact detail for sending FOI requests	307	0.611	0.225	0.474	203
Request form	Binary variable that takes the value of 1 for those municipalities whose website includes an example of FOI information request form	307	0.691	0.214	0.463	212
Appeal form for the re-examination of a previously rejected FOI request	Binary variable that takes the value of 1 for those municipalities whose website displays an example of an appeal form for the re-examination of a previously rejected FOI request	307	0.254	0.190	0.436	78
Group B: Elements that provide publicity of municipalities' management of previous FOI requests.						
Register of requests	Binary variable that takes the value of 1 for those municipalities whose website includes a register of previously received requests	307	0.713	0.205	0.453	219
Updated to Dec. 2018	Binary variable that takes the value of 1 for those municipalities whose register of received requests is updated at least to Dec. 2018.	307	0.544	0.249	0.499	167
Requests linked to replies	Binary variable that takes the value of 1 for those municipalities whose register of received requests links each request to the corresponding reply	307	0.616	0.237	0.487	189
Classification of requests	Binary variable that takes the value of 1 for those municipalities whose register of received requests clearly distinguishes FOI requests from other types of requests	307	0.491	0.251	0.501	151

Table 4

Results of the hierarchical cluster analysis based on the Ward's (1963) agglomerative method performed on variables that illustrate municipalities' performances in presenting the FOI general framework and the procedures for submitting FOI requests.

Cluster	Number of municipalities	(1) Hard or soft law act	(2) Specific web content	(3) FOI contact details	(4) Example of FOI request form	(5) Appeal form for the re-examination of a rejected FOI request
A1 Administrative compliance	101	72%*	39%*	57%	84%*	0
A2 Maximized compliance	78	45%*	71%*	91%*	99%*	100%
A3 Strained compliance	74	0%*	85%*	100%*	68%	0
A4 Non-compliance	54	0%*	0%*	0%*	0%*	0
Total	307	35%	51%	66%	69%	25%

Note: * indicates a p -value < 0.01 in the ANOVA test of difference between the cluster mean and the grand mean. The test is not applicable for variable (5) since all the observations reporting the value of 1 for this variable are in cluster A2.

For each cluster, the table shows the absolute number of municipalities belonging to it (last column), the within-cluster share of municipalities whose websites included the element indicated at the top of each column. This share is equal to the mean value calculated for the dummy variable that identified the variable mentioned at the top of the column (multiplied by 100). Finally, for each variable, the table also shows the statistical significance of the difference between the cluster mean and the grand mean (i.e., the overall share of the municipalities whose websites included the information analyzed). The clusters identified by the analysis might be described and interpreted as follows:

- A1. Municipalities in this group fulfilled the primary requirements for providing FOI-related information. Indeed, among these municipalities, which represented 33% of the sample, the publication of hard law or soft law acts (77% of cases) was remarkably more frequent than the release of specific web content (39% of cases). The publication of the FOI request form was highly frequent (84% of cases), but the availability of FOI-related contact details was rarer (57% of cases). None provided an appeal form for reexamination. Overall, the essential elements of FOI-related information seemed to be present, but full disclosure of information about FOI was not provided. Consistent with these characteristics, this cluster might be interpreted as the one that corresponded to the pattern of administrative compliance.
- A2. This cluster included 27% of the total observations. It was composed of the municipalities that predominantly chose dedicated web content for disseminating FOI-related information (71%), even if 42% of them still relied on the publication of formal acts; almost all the municipalities in this group published FOI-related contact details (91%) and made available for users both the request form (99%) and an appeal form example that might be used to ask for the reexamination of a previously rejected FOI request (100%). In light of these characteristics, these municipalities offered complete information about FOI and full support to citizens who aimed to file a request. Consistent with this perspective, this cluster might be interpreted as including all those municipalities that followed a pattern of maximized compliance.
- A3. This cluster showed almost the same size as that of A2. It was characterized by relying on web communication about FOI (85% of cases), and the publication of hard and soft law acts was avoided (0%). The publication of contact details for sending FOI requests was another feature of this cluster (100% of cases), whereas making the FOI request form available was less frequent than what was observed for Cluster A2. None of the municipalities in this cluster published the form for appealing against a rejected FOI request (0%). In line with these elements, this group corresponded to the pattern of strained compliance because the municipalities implemented only a minority of the requirements that had been laid out by the guidelines on the disclosure of FOI information. However, by publishing the basic information for

filing an FOI request (i.e., nonbureaucratic information on the procedure and contact details), the municipalities in this cluster still provided basic support for citizens willing to exercise their right to know.

- A4. Municipalities in this group did not publish any of the items inspected by our analysis. This means that they followed the pattern of noncompliance. This cluster included approximately 20% of the municipalities in our sample.

5.3. Patterns of publicity about municipalities' performance in managing FOI requests

Table 5 presents the results obtained through the cluster analysis based on the group of variables that described the municipalities' disclosures of information about the management of previous FOI requests. Information provided in this table is similar to that provided in Table 3, that is, the name of the clusters, the absolute number and share of the municipalities belonging to them, the statistical significance of mean differences between clusters, and the entire sample.

The analysis identified three clusters (B1–B3), namely three distinct patterns of disclosing information about performance in managing FOI requests. These clusters were characterized as follows:

- B1. This cluster included approximately 50% of our sample. Features of this cluster included making the register available online (100% of cases) and keeping it updated in most cases (76%). Of the municipalities in this cluster, 100% linked previous FOI requests to the corresponding replies, and 94% of them distinguished previous requests by access categories. Consistent with these features, this cluster might be interpreted as including all those municipalities that revealed maximized compliance with the Italian guidelines on the disclosure of FOI information.
- B2. This cluster included approximately 21% of our sample. The municipalities that belonged to it made the register of previous requests publicly available (in 100% of cases) and kept it updated (77% of cases); nevertheless, the distinction between types of access was rare (11%), and links between requests and replies were reported in only 55% of the cases, which is substantially below the value observed for cluster B1. Consistent with these figures, this cluster could be interpreted as characterized by administrative compliance, because the primary requirements of the Italian guidelines have been fulfilled.
- B3. The municipalities in this group did not publish any of the items inspected by our analysis. Thus, the cluster, which included approximately 28% of the municipalities in our sample, corresponded to the pattern of noncompliance.

Table 5

Results of the hierarchical cluster analysis based on the Ward's (1963) agglomerative method performed on variables that measure the publicity of municipalities' management of previous FOI requests.

Cluster	Number of municipalities	(1) Register of requests	(2) Register update	(3) Link between requests and replies	(4) Distinction among requests' typologies
B1 Maximized compliance	153	100%	76%*	100%*	94%*
B2 Strained compliance	66	100%	77%*	55%	11%*
B3 Non-compliance	88	0%	0%*	0%*	0%*
Total	307	71%	54%	62%	49%

Note: * indicates a p -value < 0.01 in the ANOVA test of difference between the cluster mean and the grand mean. The test is not applicable for variable (1) since all the observations reporting 1 for this variable coincide with members of clusters B1 and B2.

6. Explaining heterogeneity of FOI publicity patterns

6.1. Methodology

What drives municipalities' heterogeneity in FOI publicity patterns among Italian municipalities? To address this question, we ran regression analyses aimed at identifying any robust correlations between the municipalities' FOI-related publicity and their socioeconomic features.

To this end, we computed two synthetic measures of FOI publicity by performing a principal component analysis on the tetrachoric correlation matrix (Holgado-Tello *Holgado-Tello, Chacón-Moscoso, Barbero-García, et al., 2010*) resulting from the entire set of variables observed through our survey. The analysis returned a first component characterized by the variables measuring disclosures of information about performance in managing FOI requests and a second component characterized by the variables measuring disclosures of information about FOI general framework and procedures. We used the scores for each municipality on these two components to build two FOI-related publicity indicators (scaled from 0 to 100): the first one measured the degree of publicity for information about performance in managing FOI requests; the second one, instead, measured the degree of publicity about FOI framework and procedure.

Second, we relied on an ordinary least square regression analysis to test the correlation between each of these indicators and a set of covariates considered by previous studies on the determinants of local governments' transparency in Italy (*Albanese et al., 2021*). This set first included the variables observing the municipalities' demographic and socioeconomic profiles: population size (and its squared value to catch nonlinear effects), the share of highly educated population, and the average income per capita. We expected that the higher level of administrative resources of larger and richer local authorities might contribute to the publicity of FOI-related information; furthermore, we expected that the demand for FOI information (and therefore the publicity of FOI information) would be higher in contexts where the people were more educated. We also added one variable that measured internet penetration in the municipalities because the availability of this technology might foster the demand for FOI-related information. Then we considered one civic capital index (*Putnam, Leonardi, & Nanetti, 1994*), built using three proxies widely used in the literature,² which has been found to be positively correlated with the degree of transparency at the municipal level in Italy (*Albanese et al., 2021*). Finally, our set of covariates included one dummy that identified Southern regions because the literature suggested that these regions experience lower institutional quality (*Nifo & Vecchione, 2014*) and performance (*Di Mascio & Natalini, 2013; Ongaro & Valotti, 2008*). Recent research has already highlighted the influence of the North–South divide on the proactive disclosure of Italian municipalities (*Galli, Rizzo, & Scaglioni, 2019*).

Descriptive statistics and detailed information on the municipalities'

publicity scores and the covariates used in the regression analyses are available in [Table 6](#).

6.2. Results

The results of the regression analyses are shown in [Table 7](#) (where the dependent variable was the publicity of information about performance in managing FOI requests) and [Table 8](#) (where the dependent variable was the publicity of information about FOI general framework and procedure).

On the whole, these results showed a considerable difference between the determinants of publicity about FOI framework and procedure and those that represent publicity about performance in managing FOI requests. In fact, higher publicity about performance in managing FOI requests was associated with a larger population and a higher income per capita in all the specifications, whereas all the other variables failed to reach statistical significance at any conventional level. Instead, publicity about FOI framework and procedure was consistently associated with a higher level of civic capital and to a certain degree with a larger population (population squared had a negative and statistically significant coefficient).

According to the results presented in [Table 7](#), bigger municipalities were more likely to achieve a deeper detailed disclosure of information about performance in handling FOI requests. The estimated coefficients indicated that an increase of population by a standard deviation (about 200,000 inhabitants) increases publicity by about 10 points (25% of a standard deviation). Income per capita showed a comparable magnitude, because a one standard deviation increase of income per capita (3.905) was associated with a higher score of publicity, between 7.5 (Column 2) and 10.5 (Column 3).

The results presented in [Table 8](#) indicated that a standard deviation increase in population was associated with an increase of publicity about FOI framework and procedure by about 17 points (54% of a standard deviation). However, this figure had to be read together with the coefficient estimated for the squared term of population, which suggested that the association was not linear, slowly decreasing as population increases. Therefore, an increase in population from 50,000 to 250,000 inhabitants was associated with an increase of about 16 points of publicity about FOI framework and procedure, whereas an increase of population from 800,000 to 1,000,000 was associated with an increase of 7 points of publicity. Differently from the publicity about performance in managing FOI requests, the publicity about FOI framework and procedure was positively associated with civic capital. A one deviation increase of civic capital (21.583) was associated with a higher score of publicity of 8 points (25% of a standard deviation).

Being located in Southern Italy was not associated with higher scores, which may be due to the inclusion of civic capital, as Southern regions are also those with lower civic capital. Moreover, we think that education and internet penetration not reaching statistical significance in any of the specification is a finding that deserves a discussion. Whereas other variables mainly affect the supply of FOI information, education and internet access have a prevalent relation with the demand side. In fact, a larger population and a higher income per capita are

² See *Guiso et al. (2004); Guiso, Sapienza, and Zingales (2016); Nannicini, Stella, Tabellini, and Troiano (2013)*, and *Albanese et al. (2021)*, among others.

Table 6
Variables used in the OLS regressions – definitions and descriptive statistics.

Variable	Definition	Obs	Mean	Std. Dev.	Min	Max	Source
Population	Population (in thousand inhabitants)	307	88.702	200.791	30.709	2872.8	ISTAT
South and Islands	Variable taking the value of 1 if the municipality is located in Southern Italy or islands	307	0.423	0.495	0	1	Authors' elaboration
Accountability	Score on the first component of a PCA on variables of Table 3	307	58.762	39.374	0.000	100	Authors' elaboration
Publicity	Score on the second component of a PCA on variables of Table 3	307	51.872	31.963	0.000	100	Authors' elaboration
Non profit associations	Log of the N. of non-profit association divided by population	307	-5.682	0.611	-7.418	-4.412	ISTAT - Tommaso Nannicini measures of social capital for Italian provinces and municipalities Guiso, Sapienza, and Zingales (2004) - Tommaso
Blood donations	Blood donations per capita	296	0.024	0.022	0	0.105	Nannicini measures of social capital for Italian provinces and municipalities
Referendum turnout	Turnout in the referendum on divorce (1974)	295	0.872	0.069	0.680	0.97	Guiso et al. (2004) - Tommaso Nannicini measures of social capital for Italian provinces and municipalities
Civic capital	Score on the first component of a PCA on Non profit association, blood donations and referendum turnout	295	41.754	21.583	0.000	100	Authors' elaboration
Income per capita	Taxable income (in thousand euros) divided by population	307	13.278	3.905	5.574	24.708	Italian Ministry of Economic and Finance
Education	Share of adult population with secondary education	305	31.509	5.461	16.8	45.1	ISTAT
Internet penetration	Households not served by wireline network	307	0.038	0.039	0.001	0.244	Italian Regulatory Authority for Communications (Agcom)

Table 7
Determinants of publicity of municipalities' management of previous FOI requests, OLS regressions.

	(1)	(2)	(3)	(4)
Civic Capital	-0.112 (0.186)	-0.120 (0.197)	-0.180 (0.191)	-0.111 (0.186)
Population	0.0487* (0.0284)	0.0493* (0.0288)	0.0502* (0.0284)	0.0484* (0.0284)
Population ²	-0.0000135 (0.0000115)	-0.0000137 (0.0000117)	-0.0000138 (0.0000115)	-0.0000134 (0.0000115)
Income per capita	1.968* (1.043)	1.909* (1.156)	2.689** (1.229)	1.929* (1.063)
South and islands		-0.929 (7.838)		
Education			0.582 (0.544)	
Digital backwardness				-12.16 (60.73)
Constant	33.00*** (8.674)	34.46** (15.04)	8.145 (25.71)	33.94*** (9.861)
Observations	295	295	293	295

Note: Standard errors in parentheses. * $p < 0.1$, ** $p < 0.05$, *** $p < 0.01$.

supposed to increase the resources available to municipalities, which may use them to disclose FOI-related information on official websites. Instead, a higher education level may affect publicity patterns by increasing the pressure from the populace for better FOI implementation. In a similar fashion, a lower availability of internet connections may affect our dependent variables by reducing the pressure on the administration to keep the municipal website maintained and updated. As noted in the introductory section, such demand-side factors alone may not be sufficient to generate a demand for transparency and the subsequent mechanism that induces local public administrations to implement FOI publicity.

7. Discussion

By using data collected through an original survey of Italian municipalities' official websites and by relying on an HCA, we empirically studied the way Italian municipalities provide information about FOI, its procedures, and its performance. In other words, in line with previous

contributions, this work investigated the “transparency of transparency” (Villeneuve, 2014).

Our study contributes to the local governments' transparency literature in different ways. In comparison with other experiences of FOI implementation and transparency (albeit comparability is limited by different contexts, fields of study, and transparency benchmarks), the Italian municipalities show some differences and several similarities. In Spain, 62% of the municipalities analyzed by Sáez-Martín et al. (2019) had implemented FOI; however, just 39% had published municipal regulations, a number comparable with our findings (35%). On average, Italian municipalities show a better performance than those in Texas in the United States, where on average, 40% of the items of transparency are met and just 44% of the municipalities report a high transparency score (Bearfield & Bowman, 2017); further, the analysis of 500 U.S. local administration websites by Grimmelikhuijsen and Feeney (2017) reported an average score of 4.44 (on a scale from 1 to 7). Compliance with FOI laws in Italian municipalities is even better than in Central American municipalities, where less than 20% comply with proactive disclosure (García-Tabuyo, Sáez-Martín, & Caba-Pérez, 2016). However, the average compliance with 48% of the items on FOI framework and procedure and 59% of the items on performance in managing FOI requests among Italian municipalities needs to be read together with the standard deviation, which amounts to 0.47 and 0.49, respectively. As a matter of comparison, in Chile, where central government strategies have had a substantial impact on transparency at the local level, municipalities have reported an average transparency score of 45 out of 100 and a standard deviation of 26 (Piña & Avellaneda, 2019). This comparison suggests that an approach based on a mix of enforcement mechanisms and guidance, as employed by the Chilean central government, may be useful for shaping a homogeneous implementation of FOI publicity at the local level.

This finding resonates with previous research that highlighted how the implementation of transparency is a function of both local- and national-level factors (Berliner, 2017). Local governments are more likely to focus their efforts on proactive disclosures when the central government provides the right mix of guidance and enforcement (Piña & Avellaneda, 2019). In other words, weak pressure from the central level of government, which does not provide adequate and consistent feedback on what practices should be implemented, can also explain low compliance with FOI requirements (Lee, 2017). However, the results

Table 8

Determinants of publicity of information about the FOI general framework and the procedures for submitting FOI requests, OLS regressions.

	(1)	(2)	(3)	(4)
Civic Capital	0.376** (0.146)	0.361** (0.155)	0.380** (0.150)	0.373** (0.147)
Population	0.0860*** (0.0223)	0.0871*** (0.0227)	0.0834*** (0.0224)	0.0864*** (0.0224)
Population ²	-0.0000274*** (0.0000905)	-0.0000279*** (0.0000920)	-0.0000267*** (0.0000906)	-0.0000276*** (0.0000907)
Income per capita	-0.434 (0.821)	-0.549 (0.910)	-0.740 (0.968)	-0.373 (0.836)
South and islands		-1.821 (6.168)		
Education			-0.270 (0.429)	
Digital backwardness				18.84 (47.79)
Constant	35.54*** (6.827)	38.39*** (11.83)	48.38** (20.25)	34.10*** (7.759)
Observations	295	295	293	295

Note: Standard errors in parentheses. * $p < 0.1$, ** $p < 0.05$, *** $p < 0.01$.

show that a significant share of Italian municipalities have been generally supportive of FOI and willing to disclose information about FOI. If we consider the lack of both coercive and collaborative central government strategies to improve transparency of Italian local government, finding that half of the municipalities sampled are substantially transparent about FOI—with another fifth also formally so in such an environment—is a sign of the positive effects of the mere introduction of FOI. Given the substantial lack of central government involvement in the process of FOI implementation at the local level, it is likely that the interplay between local administrative capacity and political commitment is driving FOI publicity in Italy, rather than any national pressure (Sáez-Martín et al., 2019).

Quite interestingly, the determinants of disclosure of information about FOI framework and procedure and information about performance in managing FOI requests do show significant differences. The main one is civic capital affecting the publicity of information about FOI framework and procedure but not the disclosure of information about performance in managing FOI requests (which recalls municipalities' accountability). Demand-side factors such as education and access to the internet do not seem to play a role in the implementation of FOI. Most probably, at the current phase of FOI implementation in Italy, citizens are not yet fully aware of the potential of local transparency and do not direct pressure toward municipal administrations for better compliance with FOI guidelines. Therefore, the implementation of the FOI guidelines is left to the will of municipal offices and their resources, lacking an external set of incentives not only from higher levels of government but also from citizens. Currently, less attention has been given to the demand side of the transparency chain in the literature. Future research should be directed toward a better understanding of the attitudes and characteristics of citizens in relation to transparency in local governments (Piotrowski & Van Ryzin, 2007). Otherwise, local governments' efforts to provide access to information will not achieve the expected results (Krah & Mertens, 2020).

Finally, it is worth recalling that a complex sequence of events has to occur in order for FOI publicity to turn into FOI use (Roberts, 2010). Nevertheless, a significant share of Italian municipalities has disclosed FOI-related information on their official websites. This indicates awareness of transparency laws and some level of interest and compliance with guidelines issued by the central government. This could be a first step in generating a knock-on effect for public awareness and use. In turn, a greater attention being paid to FOI by the citizenship could push local administrations to enhance their implementation of publicity and their responsiveness to FOI requests, thus generating a virtuous circle. A further question that remains unanswered is whether the lack of interest and compliance with laws and guidelines highlighted by a share of Italian municipalities would rather lead to a vicious circle, hindering

other initiatives that permit citizens to act on information. Future research should investigate the interaction between supply and demand for FOI-related information by providing evidence on whether municipalities with higher degrees of FOI publicity receive more requests and/or are more responsive.

8. Conclusions

This article has contributed to the literature on local government transparency by analyzing FOI publicity patterns among Italian municipalities. The remarkable heterogeneity of FOI publicity patterns highlights that the existing categories of transparency implementation may not be suited to fully describing all the nuances observed in our analysis of Italian local government. Patterns of FOI publicity among Italian municipalities vary on a spectrum ranging from maximized compliance to non-compliance. Another way of reading this is to see some municipalities implementing the law in a spirit of openness and others merely complying with the letter of the law, especially those bodies that follow patterns of administrative and strained compliance. What is surprising is the existence of clusters of municipalities that, even though not meeting all the formal requirements of FOI publicity, focus on the disclosure of the basic information to citizens willing to exercise their right to information.

Our study provides insights to inform practitioners seeking to identify ways to support local governments' transparency. In context like Italy, central government cannot rely on enforcement strategies to promote local government transparency: on the one hand, transparency laws restrict the power of central government to sanction low compliance by municipalities; on the other hand, enforcement would not represent the most effective strategy to promote FOI publicity anyway, as it would require substantial costs in a country where local government is composed of thousands of municipalities to be monitored by central government. Given these constraints, practitioners may opt for guiding the intergovernmental process of FOI publicity via an electronic request system along the lines of official websites for submitting FOI requests that have been set up in countries like Mexico (Berliner, Bagozzi, & Palmer-Rubin, 2018) and the USA (AbouAssi & Nabatchi, 2019). This strategy would lower the costs for setting up websites for FOI publicity at the local level and trigger reputational effects from "naming and shaming" for municipalities that do not make information available on the national electronic request system. If the creation of such a system exceeds the capacity of central government, administrative guidance may draw on municipalities that showcase maximized compliance with guidelines on FOI publicity. These municipalities may function as laboratories from which peers can draw lessons (Lundin, Öberg, & Josefsson, 2015). However, information on these good practices can support

the implementation of transparency in other local authorities only if the central government develops an institutional framework that encourages the exchange of experiences between distant peers. By examining a large set of cases as we did in this study and by comparing them to a set of principles for the design of transparency such as those outlined by [Matheus, Janssen, and Janowski \(2021\)](#), central government may be able to identify common barriers to transparency and solutions for addressing them in local contexts, setting up the exchange of good practices as a form of prospective policy evaluation ([Mossberger & Wolman, 2003](#)).

Author statement

All persons who meet authorship criteria are listed as authors, and all authors certify that they have participated sufficiently in the work to take public responsibility for the content, including participation in the concept, design, analysis, writing, or revision of the manuscript. Furthermore, each author certifies that this material has not been and will not be submitted to or published in any other publication before its appearance in *Government Information Quarterly*.

Declaration of interest

The authors declare that they have no known competing financial interests or personal relationships that could have appeared to influence the work reported in this paper.

Acknowledgements

Lorenzo Cicatiello and Giuseppe Lucio Gaeta acknowledge the financial support provided by the Department of Human and Social Sciences of the University of Naples L'Orientale through the project "La trasparenza delle Amministrazioni Pubbliche: modelli di implementazione ed effetti economici, politici e sociali".

Appendix A. Municipalities included in the analysis

The municipalities included in the analysis are: Abbiategrasso, Acerra, Acireale, Adrano, Afragola, Agrigento, Alba, Albano Laziale, Alcamo, Alessandria, Alghero, Altamura, Ancona, Andria, Angri, Anzio, Aosta, Aprilia, Ardea, Arezzo, Arzano, Ascoli Piceno, Asti, Augusta, Avellino, Aversa, Avezzano, Avola, Bagheria, Barcellona Pozzo di Gotto, Bari, Barletta, Bassano del Grappa, Battipaglia, Belluno, Benevento, Bergamo, Biella, Bisceglie, Bitonto, Bollate, Bologna, Bolzano/Bozen, Brescia, Brindisi, Brugherio, Busto Arsizio, Cagliari, Caivano, Caltagirone, Caltanissetta, Camaiole, Campi Bisenzio, Campobasso, Canicattì, Cantù, Capannori, Carini, Carpi, Carrara, Casale Monferrato, Casalecchio di Reno, Casalnuovo di Napoli, Cascina, Caserta, Casoria, Cassino, Castelfranco Emilia, Castelfranco Veneto, Castellammare di Stabia, Castelvetrano, Catania, Catanzaro, Cava de' Tirreni, Cento, Cerignola, Cernusco sul Naviglio, Cerveteri, Cesano Maderno, Cesena, Chieri, Chieti, Chioggia, Ciampino, Cinisello Balsamo, Cisterna di Latina, Città di Castello, Civitanova Marche, Civitavecchia, Collegno, Cologno Monzese, Como, Conegliano, Corato, Corigliano Calabro, Corsico, Cosenza, Crema, Cremona, Crotone, Cuneo, Desio, Eboli, Empoli, Ercolano, Fabriano, Faenza, Fano, Fasano, Favara, Ferme, Ferrara, Firenze, Fiumicino, Foggia, Foligno, Fondi, Fonte Nuova, Forlì, Formia, Formigine, Francavilla Fontana, Frosinone, Gallarate, Gela, Genova, Giugliano in Campania, Gorizia, Gravina in Puglia, Grosseto, Grottaglie, Grugliasco, Gubbio, Guidonia Montecelio, Imola, Imperia, Jesi, L'Aquila, La Spezia, Ladispoli, Lamezia Terme, Lanciano, Latina, Lecce, Lecco, Legnano, Licata, Limbiate, Lissone, Livorno, Lodi, Lucca, Lucera, Lugo, Macerata, Maddaloni, Manduria, Manfredonia, Mantova, Marano di Napoli, Marcianise, Marino, Marsala, Martina Franca, Mascalucia, Massa, Massafra, Matera, Mazara del Vallo, Melito di Napoli, Merano/Meran, Messina, Milano, Milazzo, Mira, Misterbianco, Modena, Modica,

Modugno, Molfetta, Moncalieri, Monopoli, Monreale, Montebelluna, Monterotondo, Montesilvano, Monza, Mugnano di Napoli, Napoli, Nardò, Nettuno, Nichelino, Nocera Inferiore, Nola, Novara, Nuoro, Olbia, Oristano, Osimo, Ostuni, Paderno Dugnano, Padova, Pagani, Palermo, Parma, Partinico, Paternò, Pavia, Perugia, Pesaro, Pescara, Piacenza, Pinerolo, Pioltello, Piombino, Pisa, Pistoia, Pomezia, Pomi-gliano d'Arco, Pordenone, Portici, Potenza, Pozzuoli, Prato, Quarto, Quartu Sant'Elena, Ragusa, Ravenna, Reggio di Calabria, Reggio nell'Emilia, Rende, Rho, Riccione, Rieti, Rimini, Rivoli, Roma, Rosignano Marittimo, Rossano, Rovereto, Rovigo, Rozzano, Salerno, San Benedetto del Tronto, San Donato Milanese, San Donà di Piave, San Giorgio a Cremano, San Giuliano Milanese, San Giuliano Terme, San Giuseppe Vesuviano, San Lazzaro di Savena, San Severo, Sanremo, Sant'Antimo, Santa Maria Capua Vetere, Sarno, Saronno, Sassari, Sassuolo, Savona, Scafati, Scandicci, Schio, Sciacca, Segrate, Senigallia, Seregno, Sesto Fiorentino, Sesto San Giovanni, Settimo Torinese, Siena, Siracusa, Somma Vesuviana, Spoleto, Taranto, Teramo, Termoli, Terni, Terracina, Tivoli, Torino, Torre Annunziata, Torre del Greco, Trani, Trapani, Trento, Treviso, Trieste, Udine, Valsamoggia, Varese, Vasto, Velletri, Venaria Reale, Venezia, Vercelli, Verona, Viareggio, Vibo Valentia, Vicenza, Vigevano, Villafranca di Verona, Villaricca, Viterbo, Vittoria, Voghera.

References

- AbouAssi, K., & Nabatchi, T. (2019). A snapshot of FOIA administration: Examining recent trends to inform future research. *The American Review of Public Administration*, 49(1), 21–35.
- Albanese, G., Galli, E., Rizzo, I., & Scaglioni, C. (2021). Transparency, civic capital and political accountability: A virtuous relation? *Kyklos*, 1–15. <https://doi.org/10.1111/kykl.12260>
- Bastida, F., & Benito, B. (2007). Central government budget practices and transparency: An international comparison. *Public Administration*, 85(3), 667–716.
- Bearfield, D. A., & Bowman, A. O. M. (2017). Can you find it on the web? An assessment of municipal e-government transparency. *The American Review of Public Administration*, 47(2), 172–188.
- Berliner, D. (2014). The political origins of transparency. *The Journal of Politics*, 76(2), 479–491.
- Benito, B., & Bastida, F. (2009). Budget transparency, fiscal performance, and political turnout: An international approach. *Public Administration Review*, 69(3), 403–417.
- Berliner, D. (2017). Sunlight or window dressing? Local government compliance with South Africa's promotion of Access to Information Act. *Governance*, 30(4), 641–661.
- Berliner, D., Bagozzi, B. E., & Palmer-Rubin, B. (2018). What information do citizens want? Evidence from one million information requests in Mexico. *World Development*, 109, 222–235.
- Berliner, D., Ingrams, A., & Piotrowski, S. J. (2018). The future of FOI in an open government world: Implications of the open government agenda for freedom of information policy and implementation. *Villanova Law Review*, 63, 867–894.
- Bizzo, E., & Michener, G. (2017). Forest Governance without Transparency? Evaluating state efforts to reduce deforestation in the Brazilian Amazon. *Environmental Policy and Governance*, 27(6), 560–574.
- Camaj, L. (2016). From "window dressing" to "door openers"? Freedom of information legislation, public demand, and state compliance in south East Europe. *Government Information Quarterly*, 33(2), 346–357.
- Carloni, E., & Giglioli, F. (2017). Three transparencies and the persistence of opacity in the Italian government system. *European Public Law*, 23(2), 285–300.
- Darbishire, H. (2010). *Proactive transparency: The future of the right to information?* World Bank.
- Di Mascio, F., & Natalini, A. (2013). Context and mechanisms in administrative reform processes: Performance management within Italian local government. *International Public Management Journal*, 16(1), 141–166.
- Di Mascio, F., Natalini, A., & Cacciatore, F. (2019). The political origins of transparency reform: Insights from the Italian case. *Italian Political Science Review/Rivista Italiana di Scienza Politica*, 49(3), 211–227.
- Everitt, B. S., Landau, S., Leese, M., & Stahl, D. (2011). *Cluster analysis* (5th ed.). Wiley.
- Feeny, M. K., & Brown, A. (2017). Are small cities online? Content, ranking, and variation of US municipal websites. *Government Information Quarterly*, 34(1), 62–74.
- Galli, E., Rizzo, I., & Scaglioni, C. (2019). Transparency and socio-political environment in Italy. In *Italian studies on quality of life* (pp. 97–109). Cham: Springer.
- García-Tabuyo, M., Sáez-Martín, A., & Caba-Pérez, M. D. C. (2016). Mandatory versus voluntary disclosures: Drivers of proactive information provision by local governments in Central America. *Information Development*, 32(4), 1199–1215. <https://doi.org/10.1177/0266666915595260>
- Grimmelikhuijsen, S., John, P., Meijer, A., & Worthy, B. (2018). Do freedom of information laws increase transparency of government? A replication of a field experiment. *Journal of Behavioral Public Administration*, 1, 1–10.

- Grimmelikhuijsen, S. G., & Feeney, M. K. (2017). Developing and testing an integrative framework for open government adoption in local governments. *Public Administration Review*, 77(4), 579–590. <https://doi.org/10.1111/puar.12689>
- Guiso, L., Sapienza, P., & Zingales, L. (2004). The role of social capital in financial development. *American Economic Review*, 94(3), 526–556. <https://doi.org/10.1257/0002828041464498>
- Guiso, L., Sapienza, P., & Zingales, L. (2016). Long term persistence. *Journal of the European Economic Association*, 14(6), 1401–1436.
- Hazell, R., Worthy, B., & Bourke, G. (2009). *Measuring access to information: Report prepared for the World Bank*. London: The Constitution Unit, UCL.
- Heimstädt, M. (2017). Openwashing: A decoupling perspective on organizational transparency. *Technological Forecasting and Social Change*, 125, 77–86.
- Heimstädt, M., & Dobusch, L. (2018). Politics of disclosure: Organizational transparency as multiactor negotiation. *Public Administration Review*, 78(5), 727–738.
- Holgado-Tello, F. P., Chacón-Moscoso, S., Barbero-García, I., et al. (2010). Polychoric versus Pearson correlations in exploratory and confirmatory factor analysis of ordinal variables. *Quality and Quantity*, 44, 153. <https://doi.org/10.1007/s11135-008-9190-y>
- Holsen, S., & Pasquier, M. (2012). What's wrong with this picture? The case of access to information requests in two continental federal states—Germany and Switzerland. *Public Policy and Administration*, 27(4), 283–302.
- Jaccard, P. (1901). Distribution de la flore alpine dans le Bassin des Dranses et dans quelques régions voisines. *Bulletin de la Societe Vaudoise des Sciences Naturelles*, 37, 241–272.
- Jaccard, P. (1908). Nouvelles recherches sur la distribution florale [Translation]. *Bulletin de la Societe Vaudoise des Sciences Naturelles*, 44, 223–270.
- Krah, R. D. Y., & Mertens, G. (2020). Transparency in local governments: Patterns and practices of twenty-first century. *State and Local Government Review*, 52(3), 200–213.
- Kreimer, S. F. (2018). The ecology of transparency reloaded. In D. Pozen, & M. Schudson (Eds.), *Troubling transparency: The freedom of information act and beyond* (pp. 17–40). Columbia.
- Lee, J. (2017). Why have policies often remained symbolic? Understanding the reasons for decoupling between policy and practice. *Review of Policy Research*, 34(5), 617–635.
- Lundin, M., Öberg, O., & Josefsson, C. (2015). Learning from success: Are successful governments role models? *Public Administration*, 93(3), 733–752.
- Mathews, R., Janssen, M., & Janowski, T. (2021). Design principles for creating digital transparency in government. *Government Information Quarterly*, 38(1).
- Meijer, A. (2009). Understanding modern transparency. *International Review of Administrative Sciences*, 75(2), 255–269.
- Ministry for Public Administration. (2020). Consultazione pubblica su trasparenza e anticorruzione: L'ascolto degli stakeholder [Translation] https://partecipa.gov.it/uploads/decidim/attachment/file/3/Report_ConsultTraspAntiCorruzione_20032020.pdf.
- Mossberger, K., & Wolman, H. (2003). Policy transfer as a form of prospective policy evaluation: Challenges and recommendations. *Public Administration Review*, 63(4), 428–440.
- Nannicini, T., Stella, A., Tabellini, G., & Troiano, U. (2013). Social capital and political accountability. *American Economic Journal: Economic Policy*, 5(2), 222–250.
- National Anticorruption Agency. (2018). Report monitoraggio FOI al 15 gennaio 2018—Allegato 1 [Translation] <http://www.anticorruzione.it/portal/rest/jcr/rep/ository/collaboration/Digital%20Assets/anacdocs/Attivita/Pubblicazioni/Rapporti Studi/ALLEGATO%201.pdf>.
- National Anticorruption Agency. (2020). Monitoraggio conoscitivo sulla “esperienza della trasparenza” [Translation] http://www.anticorruzione.it/portal/rest/jcr/rep/ository/collaboration/Digital%20Assets/anacdocs/Attivita/Pubblicazioni/AnticorruzioneTrasparenza/Report%20questionario%20RPT%20DEF%2020_02_2020%20CLEAN2.pdf.
- Neuman, L., & Calland, R. (2007). Making the law work: The challenges of implementation. In *The Right to Know: Transparency for an Open World* (pp. 179–213).
- Nifo, A., & Vecchione, G. (2014). Do institutions play a role in skilled migration? The case of Italy. *Regional Studies*, 48(10), 1628–1649.
- Ongaro, E., & Valotti, G. (2008). Public management reform in Italy: Explaining the implementation gap. *International Journal of Public Sector Management*, 21(2), 174–204.
- Parker, C. (2002). *The open corporation: Effective self-regulation and democracy*. Cambridge University Press.
- Pasquier, M., & Villeneuve, J. P. (2007). Organizational barriers to transparency: A typology and analysis of organizational behaviour tending to prevent or restrict access to information. *International Review of Administrative Sciences*, 73(1), 147–162.
- Piña, G., & Avellaneda, C. (2019). Central government strategies to promote local governments' transparency: Guidance or enforcement? *Public Performance & Management Review*, 42(2), 357–382.
- Piotrowski, S. J., & Van Ryzin, G. G. (2007). Citizen attitudes toward transparency in local government. *The American Review of Public Administration*, 37(3), 306–323.
- Putnam, R. D., Leonardi, R., & Nanetti, R. Y. (1994). *Making democracy work: Civic traditions in modern Italy*. Princeton University Press.
- Richter, P., & Wilson, R. (2013). “It's the tip of the iceberg”: The hidden tensions between theory, policy and practice in the management of freedom of information in English local government bodies—Evidence from a regional study. *Public Money & Management*, 33(3), 177–184.
- Roberts, A. (2010). A great and revolutionary law? The first four years of India's Right to Information Act. *Public Administration Review*, 70(6), 925–933.
- Roberts, A. S. (1998). *Limited access: Assessing the health of Canada's freedom of information laws*. Queen's University.
- Sáez-Martín, A., López-Hernández, A. M., & Caba-Pérez, C. (2019). Municipal size and institutional support as differential elements in the implementation of freedom of information legislation by Spanish local governments. *Public Management Review*, 1–21.
- Savona, P., & Simonati, A. (2019). Transparency in action in Italy: The triple right of access and its complicated life. In D. C. Dragos, P. Kovac, & A. T. Marseille (Eds.), *The laws of transparency in action: A European perspective* (pp. 255–293). Palgrave Macmillan.
- Schnell, S. (2020). Vision, voice, and technology: Is there a global “open government” trend? *Administration and Society*, 52(10), 1593–1620. <https://doi.org/10.1177/0095399720918316>
- Snell, R. (2001). Administrative compliance: Evaluating the effectiveness of freedom of information. *Freedom of Information Review*, 93, 26–32.
- Sunlight Foundation. (2018). Siblings or silos?. <https://sunlightfoundation.com/2018/06/29/siblings-silos-open-data-and-FOI/>.
- Tejedo-Romero, F., & Araujo, J. F. F. E. (2020). E-government-enabled transparency: The effect of electoral aspects and citizen's access to internet on information disclosure. *Journal of Information Technology & Politics*, 1–23.
- Villeneuve, J. P. (2014). Transparency of transparency: The pro-active disclosure of the rules governing access to information as a gauge of organisational cultural transformation—The case of the Swiss transparency regime. *Government Information Quarterly*, 31(4), 556–562.
- Ward, J. H., Jr. (1963). Hierarchical grouping to optimize an objective function. *Journal of the American Statistical Association*, 58, 236–244.
- World Justice Project. (2015). WJP rule of law index 2015. <http://worldjusticeproject.org/rule-of-law-index>.
- Worthy, B., John, P., & Vannoni, M. (2017). Transparency at the parish pump: A field experiment to measure the effectiveness of freedom of information requests in England. *Journal of Public Administration Research and Theory*, 27(3), 485–500.

Lorenzo Cicatiello is Assistant Professor of Economics at the Department of Human and Social Sciences of the University of Naples L'Orientale. He has published papers on causes and effects of government transparency and citizens' socio-political attitudes.

Elina De Simone is Professor of Public Economics at the Department of Economics of the Roma Tre University. Her research interests concern transparency and open government, budgetary institutions and citizens' attitudes toward government.

Fabrizio Di Mascio is Professor of Political Science at the University of Turin, Italy. His research focuses on public management reform, regulatory governance, anticorruption and transparency. He has served as policy advisor in Italian public bodies, including the Italian Anticorruption Agency.

Giuseppe Lucio Gaeta is Assistant Professor of Public Economics at the Department of Human and Social Sciences at the University of Naples L'Orientale. His research focuses on government transparency, Political Economy, educational and cultural policies.

Alessandro Natalini is Professor of Political Science at the Law Department of the Parthenope University of Naples, Italy. His main research interests are better regulation policy and public management reform. He has been board member of the Commission for the Evaluation, Integrity and Transparency of Public Bodies (CIVIT) and of the Anticorruption National Authority (ANAC) (2011–2014).

Benjamin Worthy is Senior Lecturer at the Department of Politics of Birkbeck College. His research interests include Government Transparency, particularly Freedom of Information, as well as Political Leadership and British Politics.