A MODEL OF POLICY ARCHITECTURE IN CULTURAL HERITAGE PROTECTION: "*SUPERPOSITION - SUBSIDIARITY - MULTILEVEL GOVERNANCE (S-S-MLG MODEL)*" ON THE EXAMPLE OF THE IMMOVABLE HERITAGE PROTECTION POLICY OF THE REPUBLIC OF POLAND

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Abstract

The paper presents a model of public policy architecture in the field of cultural heritage protection, which the authors have discovered and named: Superposition - Subsidiarity - Multilevel Governance (S-S-MLG Model). This model also describes other public policies (sectoral and horizontal), which can and should be analysed with the use of it. Therefore, the developed model is of comprehensive utility for political science, administration, and public policy practice. The first part of the paper is devoted to models for public policy analysis, i.e., decision making / decision models, process models, architecture models, evaluation models. The next issue is the definition of the cultural heritage policy as an umbrella policy for seven specific vertical policies, i.e., the policy towards immovable monuments, the policy towards movable monuments, the policy towards archaeological monuments, the policy towards intangible heritage, the policy towards heritage of exceptional value, the policy towards difficult heritage and the policy towards endangered heritage. The policy towards immovable monuments can also be named the immovable heritage protection policy. Then, the developed S-S-MLG Model is presented. The superposition principle for public policy studies is discussed in detail. Next the subsidiarity principle, its rules, and the practice of their implementation in the policy towards immovable monuments in Poland are explained. The final topic is the discussion of the Multilevel Governance (MLG) methodology as the only method of effective implementation of the assumed goals in the policy systems based on superposition and subsidiarity principles, drawing from the many years of experience of the European Union.

Keywords: *public policy, heritage, immovable heritage, superposition, subsidiarity, multilevel governance, European Union*

INTRODUCTION

The system of policy for the protection of immovable monuments in Poland is currently based on two principles, i.e., superposition and subsidiarity. Many entities from various spheres / sectors, i.e., public, social, and private, are involved in the implementation of the objectives of this policy. These are entities from the central and local government sector, religious associations, non-governmental organizations, enterprises, and natural persons. The actions of all of them must be effective to achieve the policy objective of passing the stock of immovable monuments to the next generation in a state of at least good condition. Unfortunately, the research of the National Heritage Institute (*Narodowy Instytut Dziedzictwa*), the Central Statistical Office (*Główny Urząd Statystyczny*), the world of science and the audits of the Supreme Audit Office (*Najwyższa Izba Kontroli*) show several irregularities in the functioning of the system of this policy and recognise that its objectives are not being achieved. This is most clearly evidenced by the fact that 72.1% of the registered historic resource in Poland shows signs of deterioration and requires conservation, restoration or renovation works. The identification of the system's problems revealed that the missing link for its effectiveness is the implementation of the principles of MultiLevel Governance (MLG).

The authors developed the *"Superposition - Subsidiarity - Multilevel Governance Model*" (S-S-MLG Model). The model indicates that: *if the system (architecture) of a given public policy is based (built) on the principle of superposition, i.e., that in order to achieve the main goal of a policy, it is necessary*

to achieve the goals of many entities from various spheres of social life that are not hierarchically dependent on each other, then in order to achieve the overarching goal subsidiarity mechanisms should first be implemented, followed by multi-level governance mechanisms. This article presents this model on the example of the policy towards immovable monuments in Poland and its system. The model and the article are based on many years of research on the system and functioning of this policy in Poland (Dr. Katarzyna Obłąkowska) and many years of research on the system of the European Union (EU) and Multilevel Governance (Dr. Artur Bartoszewicz). This model was included in the theoretical groups of models for the analysis of public policy, which were distinguished based on the analysis of the literature. The S-S-MLG model belongs to the architecture models. Understanding it indicates that it is applicable to many policies and is useful for analysing and programming many public policies.

1. MODEL FOR PUBLIC POLICY ANALYSIS

Several models have been formulated in the field of public policy science. They serve, firstly, to simplify and clarify the way of thinking about public policy, secondly, to identify important aspects of public policy problems, thirdly, they help people dealing with public policy to communicate with each other by focusing on the basic features of political life, fourthly, they direct scientists' efforts towards a better understanding public policy by suggesting what is important and what is not important and, finally, the providing of explanations for public policy and predicting the consequences (Dye, 2013: 15).

The analysis of the literature on the subject allowed to distinguish four groups of models for the analysis of public policy, i.e.

1. Decision making / decision models - they focus on the role of decisions in the public policy process, which they perceive as the domain of state activity, and focus on the method of reaching decisions.
2. Process models - they focus on the stages, dimensions and context of public policy that they are perceived either in a linear-sequential or non-linear ways.
3. Models of architecture - they focus on the design, construction, structure, and substance (fabric) of the system and structure of public policy.
4. Evaluation models – they focus on the evaluation of the value, implementation, impacts and results of public policy in harmony with the critical-rational approach.

Each of the developed models is important and, in theory, independent. However, we can only analyse a specific public policy by using a compilation of several models. For example, to analyse the historical development and the current state of the policy towards immovable monuments in Poland, it was necessary to use the elitist and interest group models in decision-making models, and the innovation-diffusion and incremental models, as well as *The Institutional Analysis and Development Framework* in the process models. The analysis of the structure of the system and the structure of this policy led to the description of its architecture as the *"Superposition-Subsidiarity Model"* (Obłąkowska, 2021:170), which requires Multilevel Governance (MLG) to be effective - hence the S-S-MLG Model, which was included in the architecture models.

2. PUBLIC POLICY IN THE FIELD OF IMMOVABLE MONUMENTS

The cultural heritage policy is an umbrella policy for seven specific vertical policies, i.e., the policy of immovable monuments (which the work concerns), the policy of movable monuments, the policy of archaeological monuments, the policy of intangible heritage, the policy of heritage of exceptional value, the policy towards difficult heritage and the policy towards endangered heritage. It is also a horizontal policy for other state activities. The policy towards immovable monuments can also be named the immovable heritage protection policy.

Public policy in the field of immovable monuments from the *public-centric perspective* is *a formal institutional agreement for the state and society working together to identify, organize, visualize, preserve, and give over to the next generation a set of historical immovable objects important for the*

cultural heritage of the heritage community and, to a certain extent, culturalization in its range. The main objective of the policy towards immovable monuments should be to pass on to the next generation a collection of immovable monuments in at least good technical condition and the authenticity of physical substance and form, as well as to shape the awareness and attitudes of the new generation and educate staff for the continuity of care over the historic resource, i.e., to some extent culturalization in their scope (Obłąkowska, 2021:170-171).

Identification is based on the cataloguing and valuation of monuments. Organizing means covering specific objects with appropriate legal protection (mainly with an entry in the register of monuments). Visualization involves research and scientific analysis, description, interpretation, and dissemination of that knowledge. Preserving is, firstly, the introduction and enforcement of legal protection, and, secondly, care, i.e., the constant conserving of the physical substance and form of objects through actual actions that maintain them. Giving over to the next generation includes leaving the collection of immovable monuments in at least good technical condition (physical substance) and form, as well as shaping the awareness and attitudes of the new generation, as well as training the present and training new staff for the continuity of care over the historic resource (Obłąkowska, 2021:170).

3. *THE SUPERPOSITION-SUBSIDIARITY-MULTI-LEVEL GOVERNANCE MODEL* - MODEL DEVELOPMENT

The policy of the Republic of Poland towards immovable monuments in Poland has an overriding goal for the entire public administration. The Constitution of the Republic of Poland of 2 April 1997 imposed on the Polish state the task of *guarding the national heritage* (Journal of Laws of 1997, No. 78, item 483: Art. 5). This means taking all actions aimed at preserving the national heritage resource in the best possible condition, and this includes both law-making and application, as well as taking factual actions (Kowalska, 2017:32), i.e., real, physical actions towards objects, such as conservation, renovation and other construction works. The main objective of the policy towards immovable monuments should be to give over to the next generation a collection of immovable monuments in at least good technical condition and the authenticity of the physical substance and form.

For two hundred years of the history of the protection of Polish cultural heritage, a policy system in this area has been developed in Poland, based on various entities, institutions, and organizations whose actions are to jointly lead to the implementation of the main policy objective. A study by Dr Katarzyna Obłąkowska has shown that this system is based on two principles, i.e., superposition (which is the author's proposition for the sciences of politics and administration) and subsidiarity (Obłąkowska, 20210: 333-346). The implementation of this policy involves entities from various spheres of society life (state, social, private) and various levels of public authority. Therefore, for the implementation of the policy objective, also financial resources are engaged not only at the disposal of the policy organizer, i.e., the state at the central level, but also of other entities. The entities involved in the implementation of the objective of the policy for the protection of monuments and the care of monuments are as follows:

a) central state administration sphere: Minister of Culture and National Heritage, President of the Republic of Poland, Minister of the Interior and Administration, General Conservator of Monuments, Monuments Protection Council, National Heritage Institute, Main Conservation Commission, Committee for World Cultural Heritage in Poland, European Heritage Label Committee, the National Monument Protection Fund, the Church Fund, the National Fund for the Restoration of Cracow 's Monuments, state legal persons (agencies, enterprises);

b) voivodship combined administration sphere: Voivodship Conservators of Monuments, Provincial Council for the Protection of Monuments.

c) local self-government sphere: voivodship self-governments, poviats, communes, self-government legal persons;

d) social sphere: non-governmental organizations, church legal persons (churches and religious associations);

e) private sphere: natural persons, private legal persons (entrepreneurs).

Research conducted by the National Heritage Institute, audits of the Supreme Audit Office, as well as research by the Central Statistical Office and others have shown that currently the objectives of this policy are not being achieved and that there are irregularities in the functioning of the monument protection system. The main problems identified are as follows:

a) Long-lasting processes.

b) Periods without a national plan in force.

c) Failure to achieve national plan indicators.

d) Lack of sufficient consultation of the national plan with the implementing entities.

e) Failure to update strategic documents at the national, voivodship and local levels.

f) Lack of mechanisms ensuring the fulfilment of tasks by local government units.

g) Untimely administrative decisions (delays in issuing administrative decisions ranging from 76 to 865 days).

h) Unreliability.

i) Inefficient monitoring of the implementation by local government units of their statutory obligations.

j) Incomplete scope and limited effectiveness of supervision and control by the Minister of Culture and National Heritage and the General Conservator of Monuments.

k) Failure to fully exercise supervisory powers by Voivodship Monument Conservators.

l) Insufficient funds for the protection of monuments and the care for monuments.

m) Lack of mechanisms ensuring mutual information between public institutions about granted subsidies (Supreme Chamber of Control, 2021: 10-18, 36, 37).

n) 72.1% of the registered historic resource shows symptoms of destruction, including 42.3% of objects showing mild symptoms of destruction, 23.3% moderately severe, and 6.5% strong symptoms of destruction (strong damage to the structure or destruction of a large part of the object) (National Heritage Institute, 2017: 99-100).

o) Lack of cooperation between the voivodship combined (specialist) administration and local self-government (Obłąkowska, 2015: 101-102).

p) Failure of local authorities to fulfil their legal obligations (Central Statistics Office and Statistics Office in Cracow, 2020: 13).

The problems described above indicate the need to implement the principles of Multilevel Governance (MLG) in the system of monument protection and care in Poland, which allow systems based on the principle of superposition and subsidiarity to implement common priorities (Bartoszewicz, 2016: 113-114). The model of public policy architecture *"Superposition-Subsidiarity-MLG"* was developed based on research on the system and structure of the policy of immovable monuments in Poland conducted by Dr. Katarzyna Obłąkowska and research on the functioning of the European Union (EU) and Multilevel Governance conducted by Dr. Artur Bartoszewicz. The principles of superposition and subsidiarity have been recognized as those on which the system of this policy is based, and MLG has been exposed as the missing link of this system for policy effectiveness. The principle resulting from the S-S-MLG model states that: *if the system (architecture) of a given public policy is based (built) on the principle of superposition, i.e. that in order to achieve the main goal of the policy, it is necessary to achieve the goals of many entities from various spheres of social life that are not hierarchically dependent on each other, in order to achieve the overarching goal, firstly subsidiarity mechanisms and then multi-level governance mechanisms should be implemented*. The S-S-MLG Model is presented in Figure 1.

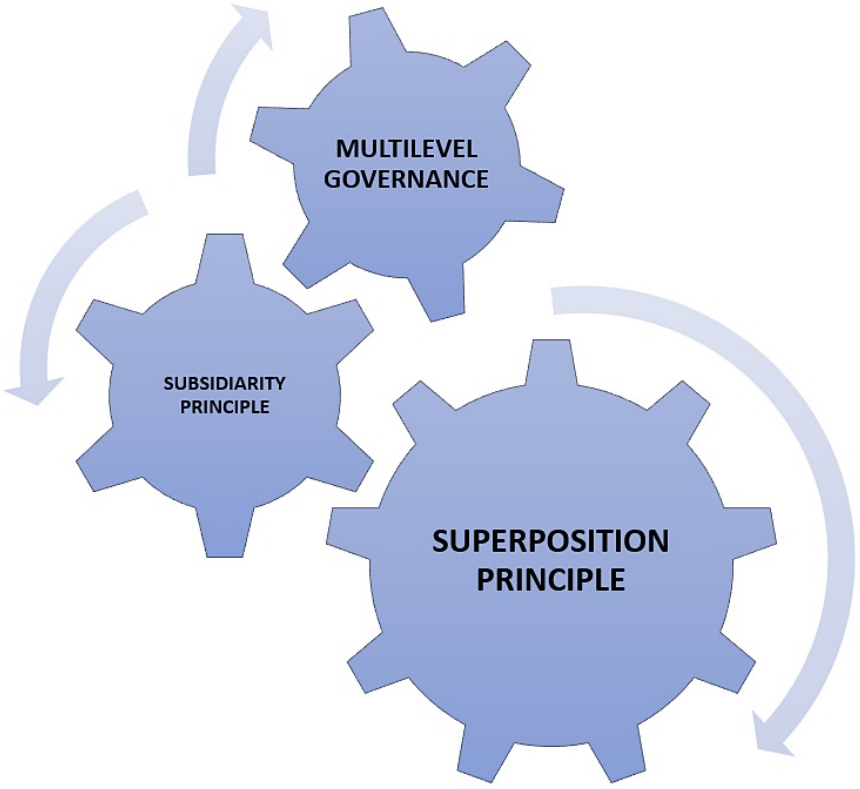

Figure 1. The S-S-MLG Model.

Source: Own elaboration: Oblakowska&Bartoszewicz.

4. THE PRINCIPLE OF SUPERPOSITION

The principle of superposition states that in order to achieve the goal of politics, i.e., a defined future state of affairs, tasks are assigned to various entities intervening in the existing state of affairs. For the policy objective to be achieved, each policy entity must perform its assigned tasks efficiently and effectively. As a rule, there is no hierarchical relationship between these entities, although there may be some spaces of the system with such a relationship. These entities come from various spheres / sectors, i.e., 1) public sector / public finances - central and local government; 2) civic / social - entities of the civic society; 3) private - human individuals, families, and enterprises (Obłąkowska, 2021: 16-17; 346).

The principle of superposition to the field of public policy science was adopted by Dr. Katarzyna Obłąkowska from the field of physics. The principle of superposition in physics, in the field of vibrations and mechanical waves, says that if there are several wave sources in a given medium, then the disturbance occurring in a given point in space does not come from one wave, but is a superposition of all waves, i.e., the resulting wave (disturbance in a given place) is the sum of disturbances from individual waves (Copernicus Science Centre, 2015).

The medium of public policy is a certain social, legal, economic, and physical reality that may affect the course of processes taking place in it. As a model, the principle of superposition in the public policy towards immovable monuments in Poland is presented in Figure 2. The SA-0 line represents the *state of affairs* in a medium at the moment of introducing the policy, i.e., intervention into a certain state of reality. And SA-1 stands for the state that is to be achieved as a policy goal. The policy actors implementing the tasks create waves of change that, only when overlapped, result in the achievement of the policy objective. If one of the entities fails to fulfil its tasks, the goal will remain only in the sphere of plans. Figure 2 shows also the institutions and organizations that act (intervene, intercede) in the field of immovable monuments in Poland, and which have already been listed. The actions of all of them

must be effective to achieve the assumed policy objective, which is to give over the stock of immovable monuments to the next generation in a minimum of good condition.

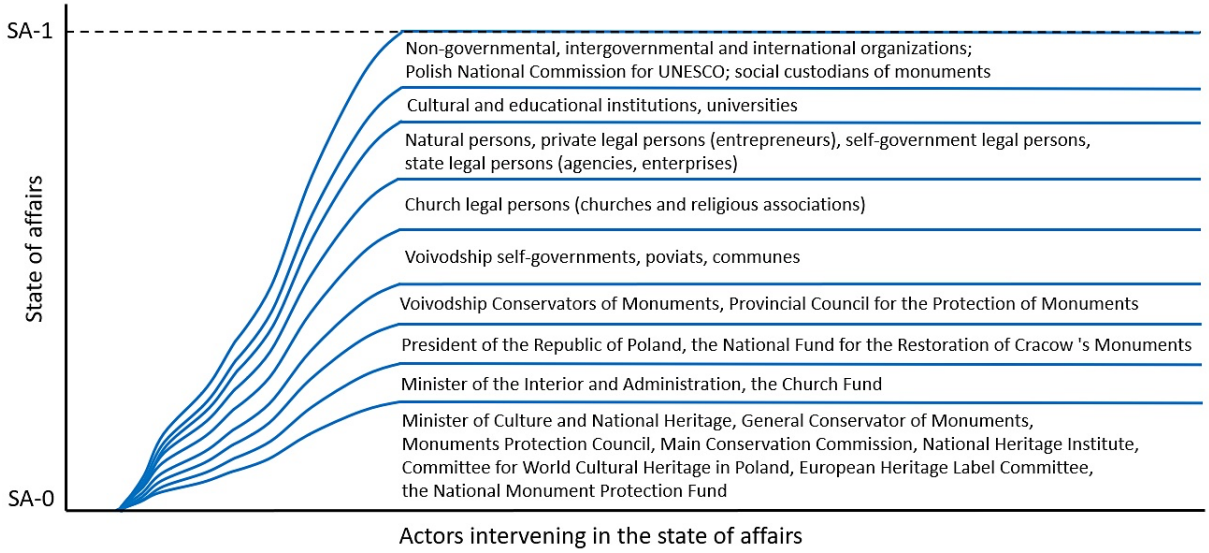

Figure 2. Diagram of summing up and overlapping activities of entities under the policy of immovable monuments in Poland, based on the principle of superposition.

Source: Own elaboration based on: Obłąkowska (2021), s. 347.

5. THE PRINCIPLE OF SUBSIDIARITY

The principle of subsidiarity as an element of the social teaching of the Church means that "*higher-order communities are to help lower-level communities, while refraining from restricting them, i.e., state authorities should not take over the tasks of lower-level structures (local governments, associations)".* It assumes the servant (auxiliary) function of the state and is opposed to statism. It is based both on the principles of freedom and solidarity and the common good (New Universal Encyclopaedia PWN, 1998c: 241). The principle of subsidiarity, as Chantal Millon-Delsol points out, stems from the belief that *"authority aims to remove certain deficiencies with which free persons and communities grapple in their quest for full development, responsible for their fate, but not quite self-sufficient"* (Millon-Delsol, 1995: 5-6). Based on knowledge about local government, the principle of subsidiarity is defined as the rule *"according to which the larger community (e.g., the state) should undertake only such tasks that the smaller one cannot perform on its own".* When developing it, it is indicated that *"the authority (regional, state, international) should be of auxiliary and supportive importance in relation to the activities of individuals and lower communities that establish them. Each level of government should perform only those tasks that cannot be effectively carried out by a lower level or by individuals operating within society themselves. Where it is not necessary, the state should allow civil society, families, etc. to act. In a situation requiring intervention, however, it should solve the problem at the level as close to citizens as possible, i.e., in municipalities rather than regions and regions rather than in the centre, rather in the state than supranational communities".* The system implementing the principle of subsidiarity involves not only government and local government administration bodies as well as individuals and families, but also non-governmental organizations, public benefit organizations and private entities (Zdyb, 2010: 574-577).

The European Charter of Local Self-Government indicates that, in line with this principle, *"public responsibilities shall generally be exercised, in preference, by those authorities which are closest to the citizen. Allocation of responsibility to another authority should weigh up the extent and nature of the task and requirements of efficiency and economy"* (European Charter of Local Self-Government, art. 4, p. 3). Bodies of local self-government authorities enter when the problem cannot be solved within the

civil society. If they are not able to cope with it effectively and efficiently, the higher and higher ranks are activated, and only then the state apparatus is activated, again starting from the lowest level. The higher tiers become appropriate when the task cannot be properly performed by the lower tier. Public authorities do not intervene arbitrarily or excessively. *"They act only for the purpose and within the limits of the necessary help"* (Izdebski, 2011: 148-149).

The principle of subsidiarity eliminates the shortcomings of a policy based on the principle of superposition, because, firstly, it enables cooperation between entities creating waves of changes in the state of affairs, and, secondly, it activates mechanisms of support and replacement to fill in possible inefficiencies, gaps, shortcomings, weaknesses, neglect and omissions occurring at lower levels by entities located higher in the hierarchy of state power.

Table 1 presents the rules of the policy based on the principle of subsidiarity and their implementation in practice in the policy of immovable monuments in Poland.

Table 1. The rules of public policy based on the principle of subsidiarity and their implementation in practice in the policy of immovable monuments in Poland.

N.	**Rule**	**The implementation of the rule in practice in the policy of immovable monuments in Poland**
1.	Entities from various levels in the hierarchy of state power are appointed to implement tasks within the framework of the policy.	Entities from various levels in the hierarchy of state authority are appointed to perform the tasks. The protection of immovable monuments is designated as the task of public administration bodies which have public funds at their disposal for this purpose. Various tasks are assigned to bodies at various levels of the state hierarchy and local government and are placed at the lowest level that guarantees the implementation of tasks. The owners or holders of historic buildings take care of a monument, and they are the entities located closest to specific buildings. The owners of monuments are various entities: the State Treasury, state legal persons, local self-government units (communities/municipalities, poviats (districts, counties), voivodship (provinces, regions)), local self-government legal persons, church legal persons (churches and religious associations), private legal persons operating for profit (enterprises, banks), private non-for-profit legal persons (associations, foundations), natural persons.
2.	Tasks are carried out by entities that are lowest in the hierarchy of state authority and guarantee the implementation of tasks (achievement of their goals) sufficiently, properly, effectively, efficiently and economically.	
3.	There exists a mechanism of supporting a lower-order entity in the hierarchy of state power in the performance of a task by an entity from a higher order in that hierarchy, if the lower-order entity cannot cope with the task on its own.	Such a mechanism are targeted subsidies from public funds for entities taking care of monuments, i.e., owners and holders of monuments entered in the register. Targeted subsidies may be granted from the budgets of the state, voivodship self-governments, poviats and communes. Funds from the European Union budget, the European

		Economic Area Financial Mechanism and the Norwegian Financial Mechanism are also allocated to activities related to immovable monuments in Poland.
4.	If an entity from a lower order in the hierarchy of state power fails to perform a task, it first receives support / help from a higher order entity in this hierarchy, and only exceptionally the task is taken over by an entity from a higher order.	With regard to the care of a monument, a lower-level entity may obtain assistance (subsidy) under the conditions: 1) the entity will apply for help directly; 2) it has a regulated ownership situation; 3) it has independently prepared documentation and arrangements for work on the monument; 4) there is a higher-level entity that will agree to provide support.
5.	There exists a mechanism for taking over the fulfilment of a task from an entity from a lower rank in the hierarchy of state power by an entity from a higher rank in this hierarchy, if the entity from a lower rank cannot cope with the fulfilment of the task.	In terms of the care of an immovable monument, there are five such mechanisms, i.e., sale, exchange, donation, lease, or expropriation for the benefit of the State Treasury or a commune.
6.	There exists a mechanism of entrusting the implementation of a task by an entity from a higher rank in the hierarchy of state power to an entity from a lower rank of this hierarchy, if the entity from a lower rank guarantees the fulfilment of this task and expresses such a will.	There are five such mechanisms in the area of the care of monuments: sale, exchange, donation, lease and transfer to permanent management.

Source: Own elaboration based on: Obłąkowska, 2021: 333-347.

6. THE CONCEPT OF MULTI-LEVEL GOVERNANCE (MLG)

The concept of Multilevel Governance was established in the 1990s as a response to the chaotic and ambivalent actions of the European Union in territorial matters. The author of the concept of Multilevel Governance is Professor Gary Marks, who created his theory in the early nineties (Marks, 1992)[1], as a basis for deeper European integration. The author assumed in it the dilution of power from the level of the central states to the local, regional, and supranational level. He assumed that a permanent consequence of the European integration process is the blurring of the division into the classically understood external and internal functions of the state. Thus, he questioned the traditional model of government-based policy management (*government*) for the harmonious, multi-level management of public affairs (*governance*). The very concept of *governance* primarily means a flexible division of power between institutional units and social groups affected by a given task or project (Wiktorska-Święcka, 2014: 147). It is about reducing the importance of institutional affiliation and traditional political and administrative hierarchies in favour of more flexible and informal relationships.

This governance solution is based on a long-term, multi-faceted, transnational concept of integration of the administrative and regulatory order, more widely presented by the European Commission in the problem document: European Governance (*European Governance. White Paper adopted by the European Commission on July 25, 2001*). The need to coordinate governance in the social, economic,

[1] Original concept published in: G. Marks (1992), expanded on in: G. Marks (1993).

financial, and spatial dimensions resulted from the need to ensure the achievement of the objectives and results assumed by the strategic planning system at the community level, which relate directly to interventions carried out at the national, regional and local level.

This concept makes it possible to derive and implement, with the help of various tools of socio-economic and spatial policy, the priorities defined at the highest level of government, and implemented at lower levels, based on a decentralized structure. It allows for the implementation of common priorities, taking into account the local specificity based on citizens' preferences and adaptation to local conditions. The implementation of the MLG principles allows the EU to ensure that contemporary plans and programs are implemented in accordance with the adopted time horizons and the speed of intervention planned in them at each level of development policy implementation (Bartoszewicz, 2016: 113-114).

The key coordination instruments under the MLG that have been successfully tested in the EU are:

1) Planning and programming tools - programming is the basic tool.
2) Coordinated uniform system of requirements for all participants of the system.
3) System coordinating planning processes at all levels and in different time horizons.
4) Common rules for spending financial funds, i.e., multi-annual, partnership, co-financing, additionality, and transparency.
5) Common, uniform, and transparent (within the system) rules and tools for managing public funds, including defining the eligibility of projects and expenses, certification of expenses, financial and material sustainability, multi-level reporting system, monitoring, and evaluation.
6) Common principles of control and reporting on irregularities in spending funds.
7) Linking cash flow to policy goals fulfilment (Bartoszewicz, 2016: 118-121, 123).

MLG governance may be carried out simultaneously by supranational structures, local self-government and civic (social) and economic organizations. The condition, however, is the creation of partnership mechanisms. The basis for defining governance levels in this approach is the area as a territory (subnational, national, supranational), but it can also be a jurisdictional dimension - legitimizing specific functions and powers. It is also possible to divide the actors involved in exercising power.

7. EU EXPERIENCE IN THE MLG FIELD

The EU, an economic and political union of twenty-seven states, constructs and implements policies, strategies and programs based on joint decisions taken both at the national and community level. To this end, the states forming the community developed several organizational, institutional, and legal solutions which became the basis for cooperation. The application of uniform rules and principles of management allowed for the practical implementation of the methodology of *Multilevel Governance* (MLG) throughout the EU.

The MLG theory was adopted by the EU in the Maastricht Treaty in 1992. As an innovative approach, it is used during the work of the European Commission (EC) and meetings of the European Council (CoE) with the help of various tools of socio-economic and spatial policy. However, due to the specific local and regional conditions of the Member States, in which problems and barriers to development are identified, additional adaptation tools are used. On the one hand, they guarantee the implementation of community priorities, and on the other hand, they refer to the local specificity based on citizens' preferences, which may change depending on the region, while e.g., macroeconomic stabilization, innovation policy conducted at the community level or environmental policy are unable to. The most difficult, and it seems also decisive, aspect of the above approach is to ensure full coordination of activities of all participants (actors) in the process of implementing the public decision. The methodology developed by G. Marks and L. Hooghe indicates two optimal types of multi-level governance.

The first type assumes a clear division of responsibilities between multifunctional political spheres, covering relatively well-defined and excluded areas (model similar to federalism) (Agh, 2010: 11). The second type takes into account the possibility of some areas of influence overlapping others, at the same time including the activity of distributed networks of connections consisting of various institutions and actors, both public and private (Jachtenfuchs, Kohler-Koch, 1996: 14). They are indicated by the hierarchical, network nature of relations between all levels participating in the implementation of a given decision. It also makes it possible for each of the participants of public life to tend to focus on their specific functions and maximize the satisfaction of their own expectations. The MLG concept has generated completely new concepts, including polycentric management, multi-level forward management, responsive governance, condominium and horizontal and vertical fragmentation of management, and a new understanding of state, federation, confederation, consortium, etc. (Scharpf, 2003: 219-253).

The OECD Guidelines (OECD, 2014) referred to in the 6th EU Cohesion Report (European Commission, 2014) also indicate the need to conduct coordinating activities to ensure (increase) the effectiveness of public intervention under Community policies. The document indicates that national authorities rarely act alone in terms of public investment. In this context, it has been suggested that the effective conduct of public investment requires considerable coordination at all levels of public administration. Coordination aims to close a potential information, tax, and policy gap. It also identified the need for key management capabilities at various levels to develop and implement public investment projects.

The basic instrument of coordination under the MLG in the EU is the active use of a number of planning and programming tools in shaping development processes, especially as a result of the implementation of the Cohesion Policy, the Common Agricultural Policy and the Common Fisheries Policy. From the point of view of the activities undertaken under the above-mentioned EU policies, the dimension of the program and planning activities covers both the regional (even local) level, the microeconomic level (intervention in the development of enterprises and entrepreneurship support), the macroeconomic (country level), and the community and supranational macroeconomic level. Programming has become the basic tool for constructing the development order of the Member States, especially within the EU Cohesion Policy[2].

The application of uniform rules and principles of financial governance allowed for the practical implementation of MLG throughout the EU. The need to coordinate financial governance resulted from the need to ensure the achievement of the objectives and results assumed by the strategic planning system at the community level, which were to relate directly to the interventions carried out at the national, regional and local level. Financial rules allow, inter alia, for creating an effective system of funds flow between the European Commission and the beneficiary country, ensuring that the allocation is made more realistic in a long-term perspective, reducing the risk of irregularities, limiting the value of transferred funds in relation to the potential absorption capacity of individual countries, ensuring control and monitoring mechanisms, both at the national and community.

The current motivation for MLG implementation is primarily due to the link between political decisions and specific cash flow. The mechanisms under MLG currently applied in the EU allow for the systemic implementation of joint decisions resulting from Community policies. They lead to the achievement of most of the objectives of individual EU policies assumed by the planning and program system, although their effectiveness at the product level is clearly higher than at the level of the assumed results. The concept of Multi-level Governance, based on coordination mechanisms, favours a network model of the functioning of decision-making centres and entities, both at the national and Community level. The diffusion of power makes individual states (and any other political system) today one of the coexisting links of networks conducting their independent policy, not being able to fully control the flow of

[2] Programming means the process of organizing, making decisions and allocating financial resources in several stages, involving partners, aimed at implementing, on a multi-annual basis, joint action by the Union and the Member States on the way to achieving the objectives of the Union strategy for smart, sustainable, and inclusive growth. (Regulation (Eu) No 1303/2013 of The European Parliament and of The Council of 17 December 2013).

information and control the behaviour of individual actors - participants in the design and implementation of policy. Forming networks in the social, economic, and spatial dimensions are independent of each other, while maintaining interdependence with respect to general principles determined by the legal system and policy conducted both at the national and Community level. Even when conducting independent activity, they remain in constant interactions, often of a negotiation nature. Therefore, building management mechanisms in the multi-level dimension without developing a partnership based on a consultation system seems to be ineffective. However, the process of creating a framework, for example for public consultations, in the EU began a long time ago and still seems far from perfect.

8. MLG IN POLAND AND IN THE POLISH POLICY FOR THE PROTECTION OF IMMOVABLE MONUMENTS

In Poland, the factors contributing to the dissemination of MLG elements are primarily the decentralization of the state, the increasing openness of public administration, increased social activity of citizens, high activity of non-governmental organizations and experience in implementing EU policies. Significant barriers can also be identified, including significant autonomy of territorial units, low quality of public institutions, low quality of the hybrid institutional system, weakness of social capital and low level of networking. Therefore, it seems that under the current conditions, the full implementation of MLG will require not only a comprehensive institutional reform, but also an increase in activities aimed at activating the civic and building social capital. However, the final assessment of barriers and potentials for MLG implementation, both at the national and Community level, requires further research.

In the literature, we find an attempt to classify MLG: concept development, trajectory, sectoral, participatory, and systemic (Żurek, 2013: 92). In the policy system for the protection of immovable monuments in Poland, it is advisable to use at least two of the five MLG concepts, i.e. sectoral and participatory. The first allows the methodology to be narrowed down to one sector, while the second assumes the participation in multi-level management of actors whose level of development, involvement and economic strength is not uniform. Currently, MLG is not implemented in the policy of protecting immovable monuments in Poland.

SUMMARY AND CONCLUSIONS

The Multilevel Governance Methodology eliminates the shortcomings of a policy based on the principle of superposition and subsidiarity, introduces coordination, planning, programming and financial governance, control, monitoring, evaluation, transparency of roles and tasks in the system. It allows to achieve common goals in systems based on the principle of superposition and subsidiarity.

The article showed how the system of policy towards immovable monuments functions in Poland. However, the developed *S-S-MLG Model* also refers to the architecture of other public policies (sectoral and horizontal) and their analysis should use this model. Therefore, the developed model is of comprehensive utility for political science, administration, and public policy practice. A thorough understanding of it also implies the conclusion that it is useful for understanding the structure of the functioning of the European Union system architecture. In relation to the architecture of the EU, it should be recognized that it is based on the principle of superposition, then subsidiarity and then MLG. Thus, the *S-S-MLG Model* is also a UE architecture model.

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