Can Policy Making be Evidence-Based?

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ABSTRACT

Ministers are always calling for more evidence-based interventions. Do they apply the same criterion to their own work of making policy? Perhaps surprisingly, policy making is not an evidence-free zone. However, it is important to understand the ways in which policy makers in different situations will use information differently, count different kinds of information as evidence, and so exercise different styles of judgment.

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What price evidence-based policy?

When doctors and social workers and other professionals are being expected to confine themselves to using only those interventions that are 'evidence-based', they can perhaps be forgiven for complaining that ministers and civil servants do not seem to subject their own policy-making activity to the same discipline. From the point of view of those who deal with clients and patients, policy is something that is made at them; it often feels like living under a relentless Niagara of new initiatives, each eddy of which is as based as little or as loosely on careful analysis of the lessons of the past and of other countries as the last. White Papers on 'modernisation' of health and social care do not carry annexes with meta-analyses of policy evaluations. Ministerial speeches are not published with lists of references. New initiatives – care trusts, for example

– are extended nationally even before pilot projects have been completed or evaluated. And yet the Treasury and the Cabinet Office place great emphasis on 'evidence-based policy making'. The new Centre for Management and Policy Studies is charged with institutionalising such a culture across government. A recent Performance and Innovation Unit report, *Adding it up* (2000), called for much greater use of formal modelling in policy making. The research and statistical divisions of government departments are no less active and no smaller than under previous administrations, and in some cases have expanded slightly under New Labour. Is all this just sham? Is policy making really an evidence-free zone?

In this article, I shall argue that policy makers do in fact make extensive use of evidence, but the nature of the use made of evidence and the nature of the evidence sought may be quite different from that which characterises the academic researcher conducting a meta-analysis of a bank of evaluative studies, and different again from the use of evidence in the exercise of professional judgment. Moreover, I shall argue, in a democracy, so it should be. My own argument is based mainly on a selective review of the literature on policy making (it is too vast and ill-bounded for any rigorous meta-analysis), supplemented with some case studies for a forthcoming study (6, 2002 forthcoming). It therefore has the status of a hypothesis, not an established account that has survived a full-scale attempt at falsification.

By 'making policy', I mean the process of coming to agreement within government about the general direction

or indeed the specific of governmental action or intervention (or indeed inaction) (Hogwood & Gunn, 1984 pp13-20).

Policy making – an information machine

Evidence should not be defined too narrowly. For the present purpose, I shall define 'evidence' to mean 'information that is relevant to making a decision to commit to one policy or another or none, because it indicates the possible or probable benefits, risks, acceptability or status of a policy'. This is a deliberately wide definition. For if policy makers do not confine relevant evidence to that which comes in formally organised and structured forms – for example, the randomised controlled trial, or the experiment – then they are hardly alone; no account of professional judgment suggests that clinicians or social workers or teachers do so either (Dowie & Elstein, 1984).

A central problem that policy makers have always faced is not one of trying to work with insufficient relevant information about what to do, but that of managing the excess (Simon, 1977 [1960]). Faced with information overload, the danger is not that one uses no evidence at all, but that one uses simply the most readily available. This is not a new problem; the emperor Marcus Aurelius's notebooks frequently note the difficulties in standing back from the torrent of putatively relevant information to maintain focus on the important things and not to be coerced by the latest consideration put forward (Marcus Aurelius, 1964, Book VI, ¶52, VII, ¶68, IX, ¶15). Policy judgment is then a problem of appreciation of what counts as relevant, a problem of classifying types of information – essentially a problem of achieving more rather less intelligent **information-rejection** (Thompson & Wildavsky, 1986). Policy makers, like everyone else, need to reject huge quantities of information as less relevant, as less important, as impossible for them to process or take seriously without compromising fatally their ability to function, or they cannot allocate the scarcest resource in government, namely attention, to problems (March & Olsen, 1975).

This problem arises because policy makers need information, not only about the effectiveness of a procedure and the relationship between the risks and the benefits, but also about its acceptability to wider publics, its acceptability to key constituencies (clients, taxpayers, professional and producer interests), its ease and cost of implementation. For policy makers use information in the way that they do because the central challenge of political judgment is not just to exercise sound technical policy judgment, but to **conciliate** between all the interests and institutions of the society, and between the interests and institutions represented in the policy-making process.

Playing the policy-making game

Most importantly, however, policy makers undertake this work under quite specific institutional constraints. **The varieties of basic situation in which policy makers find themselves will shape what information they can reject, what they learn, how they will be able to exercise judgment**.

We can think about the policy process as a relationship between groups of policy makers in four different situations, each driven by their situation to organise, to use information and to think differently.

The poker players

The leader of a party group or a cabinet minister is surrounded by people whose loyalty cannot be indefinitely relied upon, and who cannot readily be trusted with information. The more senior are her lieutenants, the more ambitious they are, the more they want her job, and the more capable they are of overthrowing her, should she fail them electorally, make mistakes that cost them public opinion poll ratings, or fail to consult them adequately. The *cadre* consists of rivals for influence, for budgetary resources and for information, and they exhibit varying degrees of short- and long-term ruthlessness in pursuit of the ambition, without which they would not have become leaders.

Information is valued here as long as one's own control over it can be secured and while the fact of one's own possession of it is not generally known. However, the

evidence and information sought are typically information about what might be acceptable, what might make one's mark, what areas of policy look open for new initiatives that might enhance one's position. Information will count as evidence whether or not it is linked in any systematic way to other bodies of information; indeed, in this setting, it may be the more valuable for being disconnected, for then it may be easier to keep that information proprietary. Elected executive leaders are serial specialists with fields of information, with access to plenty of policy-relevant information that is proprietary to their departments, or even to their own offices. Judgment here is a matter of **insight**.

Thus, a secretary of state for health wants evidence about what other spending ministers will do, but also pays peculiar attention to opinion polls, analyses of focus group research, patient satisfaction surveys, as well as to information indicating areas of policy in which no action has been taken for a while and in which something dramatic and also affordable might be done, that could elicit at least short-term advantage. Moreover, information about another spending minister's fallback position in negotiations with the Treasury is vital evidence in decision making. However, information must be rejected that would suggest the effectiveness of a policy which is unaffordable or unpopular with key constituencies, or that would downgrade the importance of the minister's own role and department.

Executive leaders are essentially competitive individualists. They are poker players with information, played for high stakes, each player trying to bluff and call bluffs while keeping from other players any information about the cards they hold.

The chess players

Professional policy analysts working in a civil service department such as Health, an agency chief executive's office, or for a chief officer in a major spending department, by contrast, work under disciplines that encourage them to share information with each other, to trust their peers, to collaborate in teams. They are disciplined both by the intellectual standards that their work must meet, and by the formal systems of authority and accountability that govern the role of officers.

Here, the evidence sought and used is formal data, organised into structured data bases. 'Evidence-based' means 'researcherly' in this context. The division of labour between different specialisms – and professionals usually work within a single specialism for much of their career – encourages sharing of information, but only within the unit or department. The rivalry between departments for budgetary resources and influence means that professional policy units must keep proprietary from other units. For these policy makers, judgment is a matter of **analytical inference**.

In the Department of Health, for example, policy units are likely to make extensive use of expert commissions and meta-analyses, to commission research, to use epidemiological models of the responsiveness of disease and need to interventions. However, they will also value evidence from highly structured alternative budget projections which will certainly not be revealed to other departments or to the Treasury, save on very advantageous and specifically negotiated terms. Evidence has to be rejected, or at least downplayed, that would suggest the irrelevance or inappropriateness of hierarchical organisation – for example, information that would suggest that patient or client preferences alone could determine meaningful policy choice; such units will be astute to every inconsistency, vagueness or incompleteness in subjective information that enables them to deem it 'anecdotal'.

Professional policy analysts are situated within a basically hierarchical system. They are essentially chess players with information; all the pieces are out in the open for other players to see, the rules governing moves are tightly defined, but the numbers who can play by these rules are very limited.

The Snap! players

Backbench elected members of parliament or councillors (other than those who are members of some faction –

more on their situation in a moment) may be subject to greater or less discipline from the whips, depending on the political culture of the legislature or council, but they have few incentives to work together, to become either specialists or generalists, or to need to trust one another. Opportunities for influence or promotion into executive or scrutiny roles are few and seem to come, from the backbencher's point of view, randomly. They may have limited ties to their constituency, just as they have few ties to each other. In this situation, policy makers make essentially opportunistic use of unstructured information and evidence. What is important about that information is not its range, structure, or rigorous integration with banks of structured data, but its usefulness in enabling these backbenchers to solve short-term problems – for example, to survive through challenges in their local constituency, to avoid discipline by the whips while at the same time making some impact on their party. They possess little proprietary information, and typically tend to be eclectic in the policy information they can create or collect. They have few incentives to be specialists. Backbenchers are essentially isolates. For them, judgment is **groping for clues** on how to cope.

The game they play with information is Snap! They do not deal the cards, the opportunities for influence seem to come randomly, and the game of the policy process has little structure.

The football players

Finally, there are faction members, both among the elected councillors and among certain groups of officers, united only by a certain ideological commitment to certain sorts of principle, which they see the need to press upon a leadership of whose commitment to those principles they cannot be certain. They typically have limited access to influence. They must act opportunistically, hoping reactively to mobilise disaffection with the style and the decisions of others. It is hard for such leaders to discipline the faction, to prevent schism, for, although the bonds of commitment to principle are quite strong, it is difficult to legitimate the sanctions and hierarchical subordination that work elsewhere. Internal trust with information is weak,

and relationships with other factions are marked by deep rivalry and hostility.

Evidence is important to factions, and that evidence has to be connected and integrated. However, the kinds of evidence that matter most are those which represent events, problems, policies and other groups in the policy-making process in terms of their relationship to the core set of principles that bind the faction together.

Factions have weak capacity to create proprietary information, but faction members tend to be generalists, because their outlook on policy is guided by principles which they seek to apply across a wide range of policy areas – for example, care free at the point of use, or at true market prices. Factions are suspicious of the professional analyst's attention to the peculiarities of problems, seeing this as the excuse for avoiding principled action ('yes, but not in this case'), and so they reject evidence about such specificities. Here, judgment is the **application of principle**.

Factions are essentially sect-like. The game they play with information in the policy process is football; the key challenge is to hold the team together and keep the fervour of the fans, and the faction leader – the football manager – must expect to be sacked from time to time.

Styles of judgment

Each of the four basic situations produces a distinctive style of policy judgment. Professional units can often afford to be more long-term in their focus, and to pay more attention to specific features of problems. Factions stress general principles, but have no particular reason to be short-termist in their thinking, except during one of the periodic episodes of campaigning fervour when they must fight for every issue, however small, in order to sustain their own cohesion. Backbenchers and executive leaders tend to be short-termist, but for quite different reasons: the former because they have to survive and cope in a policy process controlled by others, and the latter because of the urgency of the issues, crises and rivalries that organise their power. Executive leaders need to focus on political factors in

judgment rather than general principles or specific features of policy problems.

Each of these styles, too, has its distinctive weaknesses. Professional units can sometimes exhibit a tin ear for important political dimensions, imagining the whole policy world to be like chess. Thinking only of the poker, competitive leaders can sometimes find it hard to work together to tackle problems. Isolated backbenchers, too, but for different reasons, sometimes find it hard to work together, either to hold the executive to account or to sustain a strong executive, and sometimes focus on ward concerns at the expense of the larger goals. Factions, with their relentless commitment to principle, can be blind to the exigencies and vicissitudes that drive practical policy making.

There are combinations and hybrid forms of these four situations, and some contexts can move between these types; for example, local authority scrutiny committees can, in different contexts, take several forms.
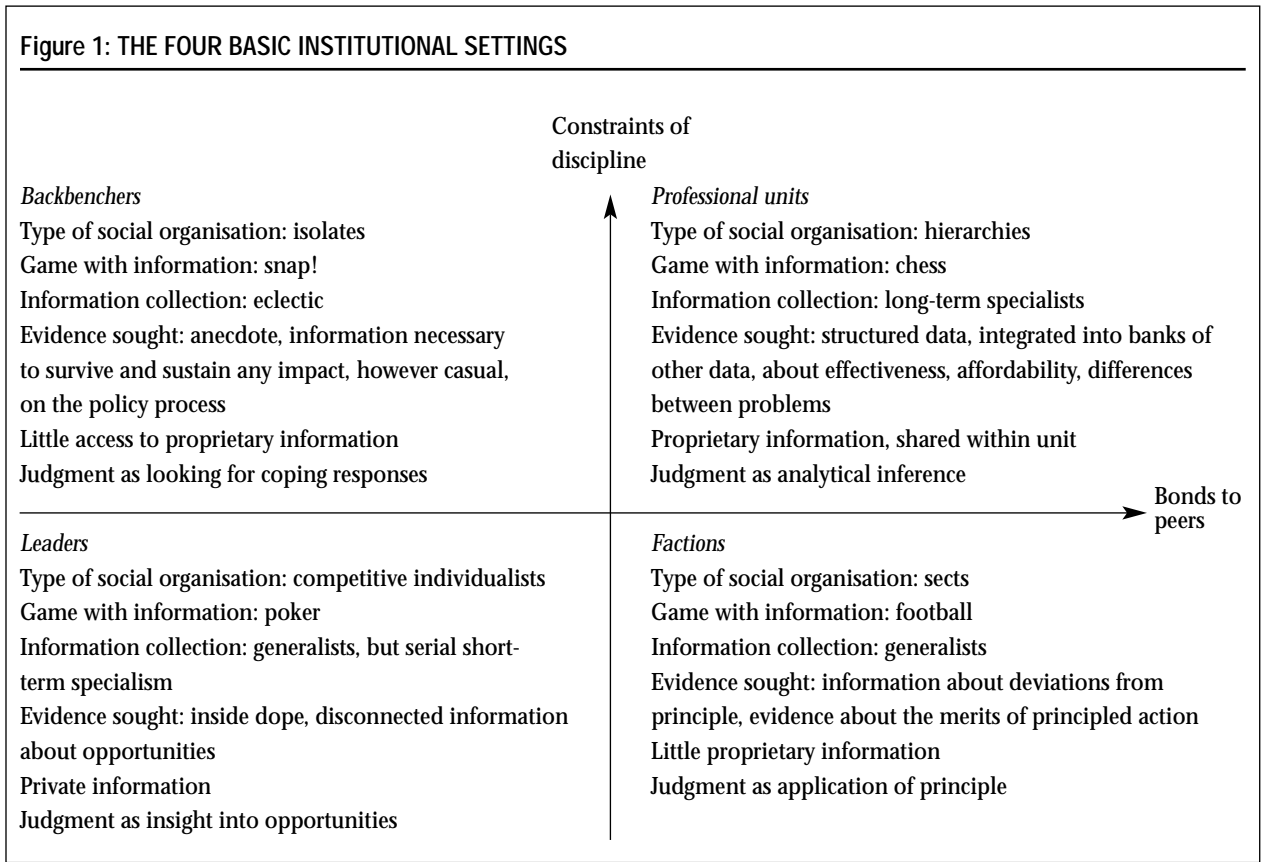
These are not psychological types. No-one is born a factionalist or a competitive *cadre* member, nor remains one having once been in these situations. Rather, these tendencies and capabilities are the product of these basic institutional situations in which policy makers find themselves. To see that they provide a jointly exhaustive account of the range of contexts, they can be shown to derive from the two basic dimensions on which social science has always measured social organisation – namely, Durkheim's (1951 [1897]) concepts of social regulation and social integration, or Douglas' (1982 [1978]) grid and group; perhaps strong and weak 'institutional constraints' and 'bonds to others' might be clearer. Cross-tabulating these two dimensions yields a two-by-two matrix. The highly constrained (subject to intellectual and managerial disciplines) and highly bonded (defined teams) form is clearly the world of hierarchy, which is exemplified in the policy process by professional policy units; the weakly bonded and weakly constrained world is that of individualism, exemplified in the policy process by the competitive leadership *cadre*; factions are a good example of the world of sect, which is highly bonded but weakly disciplined; finally, backbenchers exhibit all the hallmarks of

the heavily constrained but weakly bonded world of isolates. *Figure 1* (overleaf) shows the relationship between them.

The central hypothesis is that the nature of 'evidence' and relevance reproduces the institutional organisation of policy makers (Durkheim & Mauss, 1963 [1902] pp11, 81-88). These four basic forms, with their characteristic uses of information and definitions of what counts as evidence of use in policy making, their styles of appreciation and judgment, will spring up in any polity. For each emerges in reaction to the others; the history of policy making is the tale of their mutual confrontations and alliances. This is why no one style can dominate indefinitely. The most one can hope for is that policy makers in different situations may be able to strike some kind of settlement between all four, at least for a while, that might offset the weaknesses of each style to the others.

In a democratic polity, policy making should reflect a wide range of types of information that are counted as evidence, not just technical evidence, eg about the cost-effectiveness of interventions. Popular support, acceptability with key constituencies, conformity with constitutional norms sometimes argue for policies that may not turn out to be particularly cost-effective, but the point of a democracy is to give these factors due weight in the minds of policy makers.

The answer to the question, 'Can policy making be evidence-based?', can only be that, like professional judgment, it **always** makes use of some information as evidence, but that there is a plurality – a limited plurality, indeed – of things that count as evidence, and what counts depends on where policy makers are situated. Policy making is not just an irrational affair, in which evidence is irrelevant. On the other hand, if what is meant by the question is to ask whether all policy making can be reduced to the technical calculation of effectiveness and cost of well-defined and costed policy options, in which only effectiveness and cost matter, then the answer must be 'no'. And a good thing too – for the tyranny of bureaucratic decision making is as damaging and unsustainable as any other kind, in health and social care policy just as much as in civil rights or military matters. Better policy is more likely to come from the frank acknowledgement that, in a democracy, we positively want a

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Figure 1: THE FOUR BASIC INSTITUTIONAL SETTINGS

Constraints of discipline ↑

Bonds to peers →

Backbenchers
Type of social organisation: isolates
Game with information: snap!
Information collection: eclectic
Evidence sought: anecdote, information necessary to survive and sustain any impact, however casual, on the policy process
Little access to proprietary information
Judgment as looking for coping responses

Professional units
Type of social organisation: hierarchies
Game with information: chess
Information collection: long-term specialists
Evidence sought: structured data, integrated into banks of other data, about effectiveness, affordability, differences between problems
Proprietary information, shared within unit
Judgment as analytical inference

Leaders
Type of social organisation: competitive individualists
Game with information: poker
Information collection: generalists, but serial short-term specialism
Evidence sought: inside dope, disconnected information about opportunities
Private information
Judgment as insight into opportunities

Factions
Type of social organisation: sects
Game with information: football
Information collection: generalists
Evidence sought: information about deviations from principle, evidence about the merits of principled action
Little proprietary information
Judgment as application of principle

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system that gives recognition to each kind of evidence and judgment, to each kind of interest, and not just to those who control the slide rule.

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