

States, Legitimation and the Observation of Policy Impacts

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PRELIMINARY DRAFT OF WORK IN PROGRESS

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Summary

This paper argues that current mainstream models of public policy are ill-equipped to capture important dynamics in contemporary politics and policymaking. Most theories remain preoccupied with problems of distribution, structuring explanation around the interests of different groups affected by policy. But a growing body of sociological literature suggests that political contestation frequently revolves around competing constructions of risk, rather than conflicts over resource distribution. Moreover, governments face expanding expectations about their capacity to steer complex social dynamics. Both developments compel states to legitimise policy in areas over which they have limited control, and in which the impacts of policy are uncertain. As a result, political debate increasingly revolves around rival knowledge claims. This has major implications for theories of public policy, challenging the long-held assumption that politics is about “who gets what, when, and how”. Yet barring a few exceptions (see, e.g., Hood, Rothstein and Baldwin, 2004), public policy literature has failed to adjust its theories and typologies to capture these new dynamics.

This paper sets out some preliminary ideas for an alternative approach to understanding policy, focusing on the under-explored question of how the construction of knowledge about policy influences policymaking. In particular, it explores how observations of policy impacts shape policy styles and responses. Rather than starting with an exploration of different ways of constructing or framing policy problems, however, it suggests that we can go some way in inferring patterns of policy response through examining what I term the *epistemic structure* of policy areas. By ‘epistemic structure’ I mean certain inherent (or at least empirically stable) properties of policy interventions that structure possibilities for observing their impacts. These structuring properties can be mapped across three dimensions: (1) timing, (2) measurement and (3) causal attribution of policy impacts.

I argue that variations across these three dimensions can influence policy responses within the public administration, notably:

- the relative emphasis on output versus symbolic responses;
- the prioritisation and pacing of policy interventions; and
- the framing of issues in more or less populist terms.

As such, the (rather ambitious!) claim is that we might be able to infer important aspects of policymaking styles from structural properties of policy interventions; and, moreover, aspects of policymaking are not captured by models focused on the distributional features of policy interventions. In other words, an analysis of the epistemic structure of policy areas may be better equipped to explain variations in policymaking than traditional models, at least in areas characterised by risk and/or complexity.

The paper starts by examining why predominant theories in public policy fail to capture key aspects of contemporary political debates and policy making. In part two it sets out some components for developing an alternative theory of politics and policy, which builds mainly on organizational sociology and Luhmann’s systems theory, and especially their insights into how politicians and bureaucrats attempt to legitimize their actions. In the third part, I suggest how this could be applied to construct an explanatory typology of policy types, which links certain strategies and styles to the epistemic structure of policy areas. Finally, in

lieu of a conclusion, part 4 sketches how I might bring forward these ideas in an empirical research project.

1. New politics, old theories of public policy

Two main developments in politics have contributed to a shift in the way states attempt to secure legitimacy, or what can be termed patterns of state legitimation.¹ The first development relates to the shifting basis of contestation over policy. It is now fairly widely accepted amongst sociologists (if not political scientists) that public policy debates increasingly revolve around problems of risk and steering. The debates on (re)distribution characteristic of most of the twentieth century have been to a large extent displaced by “post-ideological” disputes about:

- The decision-making premises and outcomes of policies in areas characterized by *risk*, i.e. acknowledged uncertainty about the (potentially harmful) impact of decisions (or the impact of the failure to take decisions). Usually, uncertainty stems from the unavailability of trial-and-error testing for reliably predicting the outcome of decisions.²
- Policy interventions (regulation, programmes, etc.) to steer social and economic behaviour in complex systems such as crime, education, public health, the financial sector, and so on. Here the problem is that of how to deploy the rather blunt legal and pecuniary tools at the disposal of the state to shape social behaviour in the desired way.³

In both cases, the criteria guiding decisions and their justification are fundamentally dependent on different types of knowledge. Whereas classic distributive politics revolved around conflicting interests and values (with knowledge input to help identify target populations or deliver on objectives), debates about risk and steering both involve invoking rival knowledge claims to justify basic preferences (Beck 1992). Of course, the relevant knowledge is not limited to scientific research, but often includes the accumulated experiences and expertise of officials, practitioners and professional groups. Moreover, the deployment of knowledge claims is not free from interests or values (Wynne 2002) – indeed, deferring to the authority of expert knowledge can be largely ritualistic (Weingart 1999). However, the key point is that political contestation and the justification of policy decisions revolve around knowledge claims, rather than interests – what I call a technocratic rather than a democratic mode of settlement (Boswell 2008).

¹ By legitimation, I mean the efforts by governments and public administration to secure support through meeting the expectations of key actors – the media, electorate, interest groups, etc. – about appropriate action – see Scott 1995.

² Beck (1992, 1996); and Giddens (1994a, 1994b); and Luhmann (1991), who defines risk in contradistinction to danger, i.e. it refers to the potentially damaging consequences of actions/omissions, rather than exogenous harm. This leaves open whether the preoccupation with risk reflects a real rise in risks, or a shift in the social construction of harm.

³ Some accounts deal with risk and regulation together – e.g. Hood et al. 2004.

The second, related, shift in policy debates concerns the key challenge of governance. Traditional forms of conflict over distribution implied that states were driven by a concern to mollify relevant social groups by addressing their interests. Social groups or classes were generally clear about their interests, the state knew more or less how to deliver this, but of course could not satisfy the wishes of all. Risk and steering create a rather different problem for states, revolving around the challenge of delivery. The difficulty is not so much how to allocate resources to keep different parts of the population happy (although this is of course still a concern); but rather one of meeting often unrealistic public expectations about what the state can do to protect citizens from risk or intervene to steer their behaviour. This implies a frequent gap between what governments can feasibly achieve, and expectations articulated in the mass media and by political opposition. The upshot is a continual tendency in political debate to seek out and expose supposed transgressions on the part of incumbents – i.e. their failure to deliver on an ever-expanding set of expectations. In other words, states are expected not only to provide internal order, welfare and economic growth, but also to protect citizens from public health scares, accidents, climate change, international migration, fraud and crime. And they are frequently attributed the even more elusive task of somehow preventing social pathologies and promoting “social cohesion” (see Habermas 1976).

Both trends have huge implications for political legitimation. States are under immense pressure to meet public expectations, stoked by the competitive dynamic of party politics, and the media’s imperative to have a constant flow of good copy. However, the “success” of most policies cannot be gauged from patterns of distribution and their impact on societal interests or equality. Rather, it hinges on assessments of the ability of interventions to prevent risk or steer social processes. And, given problems of measuring and attributing impacts within a relevant timeframe, it is far from clear how such assessments are to be made, or who has the authority to make them – practitioners, interest groups, bureaucrats, researchers, politicians, the media, or focus groups.

I would like to suggest that mainstream literature in public policy has failed to capture these shifts. Most Anglo-Saxon approaches remain wedded to a theory of policy revolving round the distribution of costs and benefits between societal groups (Lowi, Wilson). Different allocations of costs and benefits yield distinct patterns of lobbying, which in turn influence policy-makers who are essentially “brokers” responding to external pressures. This account effectively screens out any autonomous role on the part of the administration: policy is determined by the configuration and power weighting of societal interests, and societal interests can in turn be inferred from the impact of policy on different groups.

In the 1980s, this pluralist account was challenged by structuralists, who attempted to “bring the state back in” by theorising the often distinct interests and strategies deployed by actors in the public administration (Nordlinger 1981; Skocpol 1985). This was without doubt an improvement on pluralism, offering a sociologically richer account of the state. However, it created two problems. The first was that of how to explain these preferences. Such theories required a theory of how and why states developed their own distinct interests and beliefs. Unfortunately, such accounts tended to rely on either Weberian/rationalist theories of the state, or Marxian/Foucauldian ideas about the expansion of power or governmentality. So

effectively, the theory falls back on a rationalist, maximizing account. As was the case with pluralist theories, this implied inferring too much uniformity, coherence and linearity into the whole process of formulating, implementing and justifying policy. Again, this was unable to capture the dynamics of state behaviour in areas of uncertainty, and where the state is struggling to meet public expectations.

The second problem was that of how to construct a causal link between an “inside” understanding of state interests, and an “outside” account of the various (media, political, electoral, interest group, judicial, international, etc.) pressures that shape and constrain these interests (Olsen 2005). Structuralist accounts attributed autonomy to the state, without providing a systematic account of when and why the state responds to pressures from its environment to secure legitimacy. One response to this problem was to reject the notion of a sharp boundary between state and civil society, through introducing more fluid notions of policy networks, advocacy coalitions, and so on. But this is, arguably, a rather flaky attempt to map configurations of actors without providing any real insight into what sorts of concerns and beliefs drive their actions. It fails to shed any light on the conditions under which states will feel impelled to adjust their behaviour in response to signals from the public, the policy community, experts, and so on.

More promising are a number of contributions from political sociology that perceive policy-making as a more messy, contingent and non-linear affair. These scholars emphasize how politicians and bureaucracies seek to juggle conflicting pressures through decoupling rhetoric from practice (Brunsson 2002; Scott and Meyer 1991), through the politics of “muddling through” and incrementalism (Lindblom 1979), or through the “deliberate malintegration” of policies (Hall 1984); how they legitimize decisions already taken by retroactively matching them to (new) problems (March and Olsen 1983; Kingdon 1995; Weick 1995); and, more generally, how in most areas, for most of the time, legitimation is dependent on persuasion, rhetoric and symbolic action far more than it is on policy outputs (Edelman 1999; Gusfield 1981; Kingdon 1995; Majone 1989; Brunsson 2002, etc.). The problem with these accounts, however, is that their insights remain somewhat fragmented. Scholars in this tradition of political sociology tend to be reluctant to work up generalizable claims about the likely impacts of these patterns of legitimation on policy styles or outputs. In other words, they do not take the step of developing explanatory typologies linking observations about features of different policy problems and resulting styles or strategies adopted by policymakers. Arguably, this leaves the field free for more elegant and wieldy theories based on rational choice models.

What seems to be lacking, then, is a theory of public policy that captures the new features of contemporary politics, and especially the challenges of policy making in areas of risk and steering. And, moreover, one that is capable of producing a number of general claims about the factors influencing policy styles or outputs. In what follows, I argue that we can go some way to inferring patterns of policy-making from certain structural features of policy areas that affect how policy outcomes are observed: notably, the timing, measurability and attributability of impacts in the relevant areas of policy. To do so, we need to proceed in two main steps. First, we need to develop a theory of how states derive legitimacy, including in

areas of risk and steering. And second, we need to see how these patterns of legitimation might be dependent on what we could term the epistemological structure of policy areas.

2. An alternative theory of political legitimation

One key element of such an account is a theory of the state that is both more nuanced than those provided by pluralism/structuralism, and which avoids the inside/outside trap. I would suggest introducing two main elements to assist us here: organizational sociology, to help make sense of action within the public administration; and Luhmann's systems theory, to help theorize the relationship between politics and administration, as well as how the administration responds to signals in their environment.

First, we need to distinguish between the different logics guiding action in the systems of politics and the administration. The political system refers to the various activities and dynamics of party politics, which is preoccupied with the competitive mobilization of electoral support. Political parties mobilize support by selecting and framing social demands for state action (Luhmann 1981). Such debates are characterized by what we can refer to as 'declaratory' politics: often symbolic and ritualistic contestation which is enacted in the public arena, and communicated through party manifestos, speeches, parliamentary debates and mass media coverage (Edelman 1999). This dynamic of competitive mobilization and the various rituals associated with it broadly (though often only very approximately) shape the decision-making premises that provide the basis for more detailed (bureaucratic) policy making. In selecting issues for political mobilization, the political system obviously looks to "public opinion"⁴ as a source of guidance. In particular, it is heavily reliant on the mass media as a source of information on public opinion, and as a means of gauging the resonance of its own programmes.

The administrative system, meanwhile, refers to the government agencies that elaborate these guidelines into collectively binding decisions: the ministries, departments and agencies concerned with drafting detailed programmes and legislation, and with overseeing their implementation. Unlike in the case of party politics, administrative agencies do not look directly to public opinion or the mass media as a source of legitimation (Luhmann 1981). Instead, their main concern is to secure support from key actors in their environments: politicians, organized interests, regulatory boards and parliamentary committees. In particular, organizations in the public administration are actively engaged in responding to signals from their political leaders, often government ministers. Depending on the organization and the policy area it is working in, government departments are also more or less keen to derive support from professional and interest groups, experts, and so on, through addressing their concerns and demonstrating the organization's competence in taking sound decisions.

Now as Nils Brunsson and others have argued, there is an important distinction to be made between two main means by which administrative organizations may seek legitimacy.

⁴ See Luhmann for a critique of this concept. The proxy for measuring this is typically mass media, but there is an increasing reliance on focus groups in some countries for gauging public opinion.

Brunsson distinguishes between organizations that secure support through their rhetoric or formal structures, and those that secure it through their outputs or practice. He associates these two strategies of legitimation with organizational types: political organizations derive support from “talk” and “decisions”, while action organizations derive it from their output (Brunsson 2002). A similar distinction between symbolic and substantive output is made by Scott and Meyer (1991), but they apply these categories to analyze environments or ‘sectors’ rather than organizations. Scott and Meyer distinguish between technical and institutional environments. Technical environments are those in which organizations are rewarded for their products and services; whereas institutional sectors are those in which organizations are rewarded for conformity to rules and requirements (Scott and Meyer 1991: 123). The distinction is highly relevant for understanding policy making in areas of risk or steering, where the impacts of interventions are difficult to observe. Problems of observation may encourage policy makers to fall back on symbolic forms of legitimation (talk and decisions) rather than relying on the adjustment of substantive output to secure support.

In a recently completed project on the uses of expert knowledge in policymaking, I attempted to show how different patterns of legitimation might be correlated with features of policy areas – viz., the visibility of policy impacts, and the public attribution of these impacts to policy interventions (Boswell 2009). The basic insight was that policymakers are likely to focus on output as a source of legitimation where the outcome of policy interventions (or a failure to intervene) were: (1) visible (captured in official statistics or reports; gauged through feedback from practitioners or interest groups; or visible to affected groups; and (2) attributable, i.e. policymakers were relatively confident that the outcome in question would be attributed to their action, or at least that they would be able to demonstrate the link. In other words, they must believe that the policy community or mass media will be able to draw a causal link between policy interventions and outcomes (Gusfield 1981).

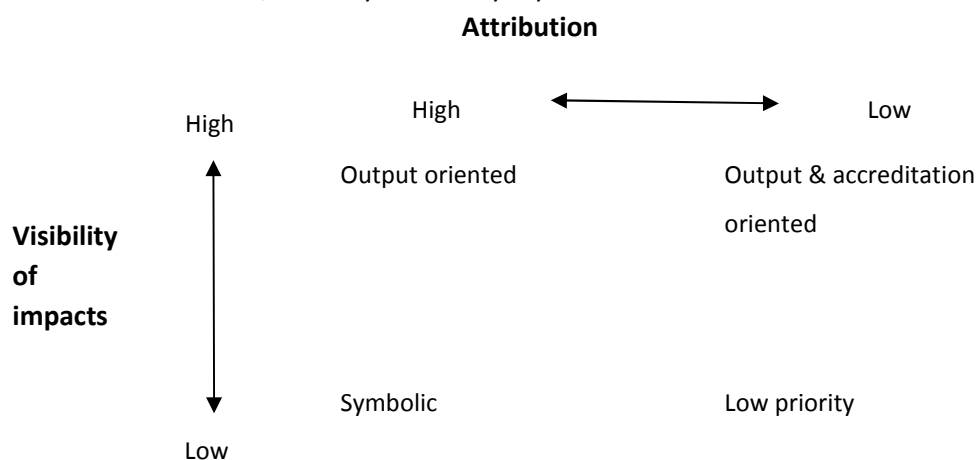
Under these conditions, policymakers are likely to focus on adjusting output as a means of security legitimacy.⁵ They expect their interventions to be rewarded or punished by their environment, whether this be the policy community, political parties, the media, or voters. So even though they may also need to conform to various institutional requirements, decision-making processes need to be oriented to maximize efficient output.

In Table 1, I have combined different levels of visibility and attribution to predict policy styles. The first type, shown in the top left corner, is the type of output oriented policymaking style just described. It is characterized by high visibility and a high level of attribution. An example of this would be the construction of a new bridge. The second type is areas combining high visibility and medium or low attribution (bottom left box). In these areas, governments can have an impact on the target of intervention, but they may not be rewarded for their actions. This will partly depend on how well they can put across their message about the causal relationship between interventions and outcomes. Thus they will

⁵ It is important to note that there may be strong incentives to adjust output in order to avoid being held to account for *failures* to act that produce observed negative outcomes (Brunsson 2002: 134). So it is not just a question of adjusting output to produce good outcomes, but also adjusting it to avert bad ones.

be concerned to adjust output, but also to ensure that their interventions are accredited (rather than being attributed to exogenous factors). An example of this would be a programme of job creation which only kicked in in the longer-term, beyond the relevant span of political accreditation. The third type is areas with low or medium visibility and high attribution (top right). In these cases, the outcomes of policy interventions are not very visible, and only loosely coupled with policies. Nonetheless, there is high attribution of problems to government action or inaction. The result is that the government is keen to be seen to be acting to address the problem. An example of this would be measures to counter terrorism. Finally, where both visibility and attribution are low, there is likely to be only limited activity in this area of policy (bottom right).

Table 1: Attribution, Visibility and Policy Styles



This schema is fine as far as it goes. It suggests how strategies for securing legitimacy may be linked to the observation and attribution of policy impacts. However, it now needs to be supplemented in two ways. First, I would like to develop these ideas into a typology of policy areas, based on the possibilities for observing and testing impacts. And second, I will try to show how these features may produce a range of variations in policy styles – not just in terms of patterns of legitimation, but also in terms of the prioritization of policy issues, the pace of frequency of actions, how issues come onto the policy agenda and how they are framed in public debate.

3. The Epistemic Structure of Policy Areas

The analysis above suggested that the visibility and attribution of policy impacts might affect how policymakers seek legitimacy: through adjusting output or through more symbolic changes to rhetoric or formal structure. In this section I would like to see whether we can infer these features of visibility and attribution from structural features of policy areas. In other words, how far we can predict patterns in the observation of policy impacts from characteristics of policy areas. If this proves possible, we may be well on the way towards developing an explanatory typology of policy styles, worked up from epistemic features of policy areas (rather than their classification as distributive/redistributive, etc.). In other

words, this might just provide a basis for a theory of public policy based on problems of observation and impact rather than questions of the distribution of costs and benefits.

The first step is to reformulate the concept of “visibility”. Thus far it has been used in a rather vague sense, denoting the susceptibility of policy impacts to observation. How could this notion be better linked to structural features of policy areas? I would like to suggest that we disaggregate the concept into two features: the timing of impacts, and possibilities for measuring these.

Let us take the question of *timing* first. This refers to the rate, or frequency, of observable impacts for a given policy intervention. Clearly, some policy impacts are immediately observable through their very tangible effects on the physical environment – for example new housing, or waste disposal systems. Others, such as welfare benefits or smoking bans, may have very immediate impacts on individuals’ lives, again being quite rapidly observable (although the aggregate impacts on unemployment or public health may be less obvious straightaway). In other cases, policy may have an immediate impact, but not in a way that instantly signals success or failure – so policy may require adjustment through a process of trial and error testing. But in all of these cases, there is little or no lag between policy interventions and some sorts of impacts relevant to gauging success. This immediacy of impacts should be contrasted to two other scenarios. The first is policy areas in which impacts can only be observed sporadically or infrequently. This may be the case for interventions using strategies or technologies that are only deployed under certain conditions (such as some types of defense technology); or for accidents or hazards that become evident over a long period or through contingent circumstances (such as major accidents on public transport or nuclear power plant disasters). The second is interventions (or failures to intervene) that may have an observable impact only in the very long term, and certainly outside of relevant political timeframes. An obvious example of this would be climate change. We can summarise these variations in the *timing* of impacts as immediate, sporadic and long-term impacts.

The second dimension is *measurement*. This refers to the various methods by which policy impacts are observed, and, correspondingly, the groups who are likely to do the observing. There is a wide variety of methods that may be more or less appropriate for measuring impact. For example, unemployment levels or take-up of health services are typically measured through official statistics. Social phenomena not captured through interactions with official structures – such as irregular employment or drug abuse – may be only observable through commissioned research studies. In other cases, the success of policy is judged through the suitability of equipment or forms of treatment or training, and is best observed by practitioners. Examples of this might be certain types of military equipment, teaching techniques or health treatment. Finally, some impacts affect the physical environment or individual welfare in very tangible ways, and may be just as susceptible to measurement by members of the public. Examples of this would be the effect of income tax, public transport facilities or waste collection systems on individual welfare. It is interesting to note that most distributive/redistributive policies would fall into this last type. Again, it is useful to summarise these categories as bureaucratic, practitioner, research, and lay measurement.

In addition to timing and measurement, as before, we should also add the *attribution* of policy impacts. There is considerable variation in possibilities for ascribing impacts to policy, and this variation may be at least partially inferable from structural features of policy. At one end of the spectrum we have relatively straightforward causal attribution of impacts to specific policy interventions. For example, border control technologies may quite directly affect the possibilities for irregular border crossing. Other impacts can be attributable to a more complex range of factors. For example, changes to the school curriculum may help improve English language ability, but these outcomes are also influenced by the quality of teaching, peer effects in the classroom, broader trends in reading, the social and cultural backgrounds of pupils, and so on. In a third type of case, the impacts of government interventions may be largely indeterminable. For example, many areas of development cooperation have had, at best, an ambiguous impact on the economic performance or political stability in developing countries. Many counter-terrorism measures appear to display a similar indeterminacy, with both foreign and domestic policies designed to curb terrorist activism having minimal or even counterproductive effects.

Clearly, in areas where causal attribution is either uncertain or indeterminate, the extent to which governments are deemed responsible will depend on how such responsibility is constructed in political discourse. These patterns of attribution will be largely shaped by party political and media discourse, as well as research or enquiries that filter through into public debates. And such attributions may shift depending on political and media coverage of prominent episodes. For example, the recent Baby Peter case in the UK seems to mark a further shift towards holding public services responsible for the safety of each individual child. Indeed, given the developments in political debate outlined above, the trend is clearly in the direction of attributing governments an ever increasing share of responsibility in preventing risk and steering social processes. One important exception to this may be risks or crises that are clearly global in their origins. For example, an economic crisis spread across countries can take some of the heat off individual governments, implying a wider systemic problem. Or a flu epidemic originating abroad may be attributed to factors beyond the control of governments. However, even under these conditions public leniency for governments may be short-lived, with expectations about protection or steering instead shifted onto how well governments manage crises, or set up arrangements to prevent such hazards in the future.

In sum, we can say that different policy areas produce impacts that may vary across three dimensions:

- Timing (ongoing, sporadic, long-term)
- Measurement (bureaucratic, practitioner, research, lay)
- Attribution (direct, complex, indeterminate)

These three dimensions denote what I will term the “epistemic structure” of policy impacts, i.e. the possibilities for these impacts to be observed, and observed as causally linked to government interventions. So the next question is, how do these features affect policy responses? I shall consider each in turn.

The *timing* of policy impacts may have quite a substantial effect on the prioritization, rate and type of policy initiatives. Obviously, policy interventions with immediate impacts are likely to be the object of ongoing attention by policy makers; while those with very long-term impacts may elicit more symbolic responses, since any adjustments to output will only kick in outside of a politically relevant time frame. The influence of sporadic impacts on policy styles is more difficult to infer. Governments may invest substantial resources in certain types of crisis prevention where they are aware of potential risks, and concerned about being held responsible for their actions or omissions in relation to these risks (for example, the Thames flood barrier, or research on a vaccine for avian flu, both of which imply substantial investment in risk avoidance). However, there are frequent cases of governments failing to act in a discernibly “rational” way to prepare for potential crises (Jones and Baumgartner 2005), whether because they miscalculate risk, or because contingency planning is never as high a priority as more pressing immediate tasks, or, just as likely, because of organizational inertia. It would be fascinating to explore the relative prioritization of contingency planning for often rather unlikely scenarios in organizations that are also confronted with tasks whose impacts will be immediately visible and likely to elicit political support. Of course, where sporadic impacts catch governments unprepared, their policy responses need to mollify public and expert opinion in a highly politicized environment. As such, they may be geared more towards symbolic efforts at meeting expectations than major and enduring adjustments that are likely to reduce similar risks in the future.

Equally, there are a number of ways in which methods of *measurement* may affect policy. For a start, such variations are likely to influence how policy problems come to the attention of policymakers. Official data and practitioner observations are likely to provide a constant and fairly reliable source of information for policy planning within bureaucracies. They will facilitate policy planning, providing a stable base for incremental adjustments to policy. By contrast, public enquiries or scientific research may throw up unexpected and often unwelcome findings. Insofar as these become the object of debate in policy circles or the media, they may require overt responses on the part of governments. In such cases, adjustments may be output oriented (especially where impacts will be immediately observable); but frequently they will be symbolic, designed to meet external demands about appropriate action. Methods of measurement may also affect the framing of issues, with the mass media more likely to pick up on observations that are critical of government policy, emanating from external bodies such as public enquiries or independent research. The tabloid media also has a penchant for personal and dramatized stories, implying a relative bias towards coverage of impacts that are susceptible to lay observations.

Finally, the *attribution* of impacts may affect the prioritization of issues, with policymakers keen to avoid or mitigate problems they are considered responsible for or capable of influencing. Attribution can also influence whether policymakers adopt measures that are symbolic (adjusting rhetoric and formal structures) or output-oriented (adjusting substantive policy). Where they are aware that outcomes will be attributed to their actions, but they have limited control over these outcomes, then policy is likely to be highly symbolic. Where their actions do in fact influence outcomes but these are not accredited to government

action, then they may continue to adjust output but invest resources in demonstrating the link between policy and outcomes.

Caveats

Thus far, I have attempted to explore how far certain structural features of policy interventions – namely, the opportunities for observing and attributing their impacts – may yield different patterns of policy-making. However, as with all attempts to develop neat explanatory typologies in public policy, we run up against various problems of generalizability. Two are especially tricky in this case.

First, as hinted in the discussion on attribution, there is clearly scope for variation in the way impacts are observed and attributed, depending on a range of cultural factors. By “culture” I am referring to the historically specific and cumulatively learned patterns of values and beliefs that orient social action (Eckstein 1997: 226). In the case of observing policy impacts, different political units, social groups or policy sectors will obviously develop distinct cultures of defining, measuring or explaining policy problems. Insofar as this is the case, it will be difficult to infer such patterns of observation and attribution from any inherent features of policy interventions.

While acknowledging the scope for such variation, however, I would like to suggest that this problem is less serious for the model than might initially appear. While the attribution of responsibility may well be culturally specific and vary over time, the other two structural features I have selected – timing and measurement – are likely to remain fairly constant over time and, indeed, show similarity across political units. The timing or frequency of impacts, in particular, is to a large extent independent of patterns of observation (at least in most policy areas). And different types of impact will necessarily lend themselves to varying methods of measurement. Perhaps just as importantly, even if we accept that patterns of observation and attribution are to some extent cultural, parallel or converging empirical trends in policy interventions across countries imply a large degree of overlap. For example, there is a trend towards the harmonization of data sets in OECD and EU countries, implying the collection of similar sorts of data sets by state bureaucracies; policy research and “best practice” are becoming increasingly internationalized, again implying parallel opportunities for observing social problems and policy impacts; while media is similarly becoming increasingly internationalized in terms of topics and style of coverage. So in short, although one should be aware of the potential limits to generalizability, this does not have to imply abandoning attempts to infer policy-making styles from structural features of policy interventions.

The second impediment to generalizability is the problem of what we could term “organizational inefficiency”. Even assuming that we can infer patterns of observation and attribution from the epistemic structure of policy interventions, this does not necessarily mean that organizations will process signals about such observations in a reliable or efficient way. As Baumgartner and Jones have argued (and many sociologists before them), organizations are not rational, but pick up signals from their environments in a very patchy way (Jones and Baumgartner 2005). Thus, for example, they may not be astute in responding

to lobby groups or media reporting on social problems, or they may underestimate the risk of failing to act to avert potentially negative outcomes. This implies that the translation of observations of policy impacts to policy response is subverted by the internal dynamics of organizations.

For this reason, it makes sense to analyse how members of organizations perceive and respond to signals about how policy impacts are being observed and attributed. In other words, we should not simply look at correlations between how impacts are observed and attributed in the media or political debate, and so on, and policy styles. Rather, it is important to explore how policymakers in administrative agencies more or less efficiently pick up on such signals and respond to them in policymaking. Thus the analysis will involve exploring the relationship between epistemic structure and policymaking from the perspective of organizations involved in policy. This is also consistent with the organisational sociology approach I sketched earlier, which focuses on organizational legitimation as a key determinant of policy.

4. Next Steps

This notion of the epistemic structure of policy areas and its impact on policymaking clearly requires much more work. I plan to elaborate the model and start to apply it to empirical cases, in two stages. First, I shall refine the various hypotheses and perhaps try to condense them into some sort of model linking different constellations of timing, measurement and attribution to different policy styles or strategies.

In a second step I shall apply this model to different areas of policy. In a pilot phase, I am considering looking at three areas of immigration and integration policy in the UK, the area with which I am most familiar. The provisional choice is: (a) asylum policy, representing an area in which there is a continuous source of bureaucratic data on policy impacts, and these impacts are (rightly or wrongly) attributable to government policy; (b) irregular migration, representing an area in which the observation of impacts is only sporadic and often measured through media or lay observations, and impacts are usually attributed to government policy; and (c) immigrant integration, an area in which impacts are long-term and difficult to observe, and the impact of government policy is complex and indeterminate with less attribution to government policy.

Each case study will start by mapping the epistemic structure of policy interventions and impacts. This mapping exercise will involve analyzing how impacts in these three policy areas are observed, measured and attributed over time. I will examine the frequency and timing of observations about policy impacts in political debate (parliamentary debates, speeches), public administration (official data and reports), the media (coverage in several daily newspapers), and practitioner and research reports either commissioned by the government or featured in parliamentary debate and the mass media.

I shall then explore how these patterns of observation influence policymaking. In line with the hypotheses sketched above, the analysis will focus on how the timing, measurement and

attribution of impacts affects: the rate of policy initiatives; how far they are proactive/reactive; how issues come to the attention of policymakers; how they are framed; the prioritisation of issues; and the prevalence of symbolic responses. This will probably involve a combination of document analysis and interviews with officials. The latter will also enable me to gauge how astute or efficient policymakers are in picking up signals from their environments (political debate, the media, practitioners, research) about policy impacts. It may be that there are serious lags or distortions in the way observations of impacts are processed in administrative organizations, implying the need to ratchet down expectations about the explanatory role of epistemic structures in shaping policy.

Insofar as I can establish some link, I hope to be able to make some headway in developing an alternative explanatory typology of public policy. Rather than revolving around the distribution of costs and benefits of policy interventions, policy types would be inferred from epistemic features of policy areas, namely the possibilities for observing (and attributing) policy impacts in different areas or intervention. I hope this will be better equipped to capture what is distinctive about contemporary debates on policy: the preoccupation with risk and steering; the pressure on governments to demonstrate impact in areas over which they have limited control or knowledge; the dependence on expert knowledge for assessing policy impacts; and the frequent tension between expert or technocratic narratives of policy and those emanating from politics and the mass media.

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