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PUBLIC CONSULTATION AND PUBLIC POLICY

BY

© IAN ALASTAIR MONTGOMERIE

A THESIS SUBMITTED TO THE FACULTY OF GRADUATE STUDIES AND RESEARCH IN PARTIAL FULFILLMENT OF THE REQUIREMENTS FOR THE DEGREE OF DOCTOR OF PHILOSOPHY.

DEPARTMENT OF EDUCATIONAL ADMINISTRATION

EDMONTON, ALBERTA

SPRING 1994

ISBN 0-612-11291-8

Canada

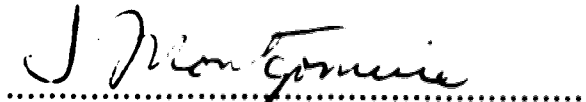
UNIVERSITY OF ALBERTA
RELEASE FORM

NAME OF AUTHOR: IAN ALASTAIR MONTGOMERIE

TITLE OF THESIS: PUBLIC CONSULTATION AND PUBLIC POLICY

DEGREE: DOCTOR OF PHILOSOPHY

YEAR THIS DEGREE GRANTED: SPRING 1994



IAN MONTGOMERIE

PERMANENT ADDRESS:

10845 38A AVENUE
EDMONTON, ALBERTA, CANADA
T6J 0L6

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PUBLIC CONSULTATION AND PUBLIC POLICY

SUBMITTED BY IAN ALASTAIR MONTGOMERIE IN PARTIAL FULFILLMENT OF THE REQUIREMENTS FOR THE DEGREE OF DOCTOR OF PHILOSOPHY IN EDUCATIONAL ADMINISTRATION.

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Supervisor, M. Horowitz

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D.A. MacKay

.....

A. Tupper

.....

E. Miklos

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L.J. LaRocque

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External Examiner B.J. Shapiro

Date: April 11, 1994

Dedication

To Scott and Jessica

Abstract

Administrators are now expected to engage in much more direct public consultation in the making of public policy than has previously been demanded. The purpose of this research is to begin to develop a framework for understanding the role of public consultation in the formulation of public policy, from the perspective of the administrator.

Interviews were conducted with twenty-three administrators selected from the Provincial Government of Alberta on the basis of their recent involvement in a process of public consultation. Participants were drawn from a range of departments and policy areas within government, as well as from staff, management, and executive positions.

The administrators participating in this study discussed their understanding of public consultation in three major areas: the policy process, the administrative environment, and the actions and strategies used to structure public consultation. The primary finding is that the outcomes of public consultation are strongly affected by the structure of the policy process and the assumptions which administrators hold regarding the ability of the public to contribute to the formulation of policy. The research shows that administrators face two competing forces in attempting to resolve policy issues through the use of public consultation. First, they experience a sense of contending accountabilities to clients and to legislators. Similarly, they also encounter the contending value frameworks present in the community and in the organizations and professional bodies within which they work. The orientations which administrators adopt toward these competing forces has considerable impact over the structure of the consultative processes, and consequently, its policy outcomes.

A framework for understanding the role of consultation in the formulation of public policy is proposed which attempts to relate the orientations of administrators to the potential policy impact of consultation. The framework shows that consultation is used currently to either develop policy-relevant information on public preferences or to develop relationships with the community which will support implementation of the policy. However, the framework also suggests that consultation might be used to advantage for the purposes of developing a shared value framework in which the community and the organization can address policy problems in an atmosphere of trust.

Acknowledgments

Conducting this study has been an immensely enjoyable experience, largely due to the many outstanding people who have shared a moment of their lives to support and encourage these efforts.

One could not ask for a more wise and knowledgeable supervisory committee. My supervisor, Myer Horowitz, has been a master of gentle guidance. He is an unsurpassed example of excellence in education and administration, and a truly great Canadian. Al MacKay and Allan Tupper each shared in the evolution of these ideas through their comments on the developing drafts and during insightful discussions of their implications. Linda LaRocque and Erwin Miklos continued in their ceaseless pursuit of intellectual quality while serving as examiners. The kind comments of Bernard Shapiro as external examiner were encouraging and constructive.

There are many colleagues and friends among the faculty and students of the Department of Educational Administration who have given continuing support and encouragement to this project. However, it is the energetic and enthusiastic support of the Alpha Group, a study group composed of fellow doctoral students Chris Elliott, Beth Perry, David Keast, and Peggy Howard that deserves special note. Their constant intellectual challenge and continuing friendship provided the momentum to continue with the project and created an extraordinary learning experience. Special thanks are also due to my colleagues in Alberta Advanced Education and Career Development who provided a living laboratory for the development of these ideas. Of course, my appreciation is extended to the administrators involved in this study who, through their open and candid participation, allowed me a glimpse of their world.

This research was conducted while on educational leave from Alberta Career Development and Employment. This was made possible through the generous support provided by the Deputy Minister at the time, Al Craig. Additional financial assistance was also provided through the City of Edmonton Graduate Fellowship and the Faculty of Graduate Studies and Research.

I owe each of these people a debt of gratitude for sharing their lives with me. However, my greatest appreciation is for the support of my family. To my wife, Barbara, for her love during challenging times, and to my children, Scott and Jessica, for their ability to see the world in its simplicity, I will be forever grateful.

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Chapter 1

Purpose and Design of the Study

Introduction

The images are powerful and their stories compelling. Workers perched atop the walls of a Gdansk shipyard, yellow banners streaming through the streets of Manila, a crush of humanity gathered beneath a rough hewn statue in Tiananmen Square, crowds surging through the Brandenburg Gate, endless ribbons of Fleur-de-Lis filling the streets of Montreal, or the barricades of Oka. They capture our attention as their moment in history unfolds. They are critical events, unique in their historical and cultural antecedents. However, they are also more recent representations of the continuing expression of democratic will which extends throughout human history.

No longer is it possible nor is it wise for the stewards of the public trust to ignore the demands of an increasingly knowledgeable and articulate public. The responsiveness of government and publicly funded agencies to the demands of those they serve and who mandate their activities has become a critical issue. Public consultation has become an important component in the formulation of public policy and that is a significant departure from the historical role of administrators of public agencies. While the growth of consultative activities by government is a confirmation of timeless democratic principles, it is also a contemporary expression of a rising desire on the part of the public to have a greater say in the determination of the policies which affect their lives.

Purpose of the Research

The purpose of the research is to begin the process of developing a framework for understanding the role of public consultation in the formulation of public policy, from the unique perspective of the administrator.

This research, which is built upon the shared experiences of administrators who have engaged in public consultation activities, is intended to gain insights into the understanding of administrators regarding the role which public participation plays in policy making. The primary research question is then:

What understandings do administrators have regarding the role of public participation in the formulation of public policy?

However, it is the intention of this research to do more than describe, but to interpret. This brings forth the subsidiary research question which is:

What is the relationship between:
1. *the orientation of administrators to public consultation; and*
2. *the contribution of consultation to the formulation of public policy?*

The objectives of conducting such a study are first, to inform the practice of administrators by developing relevant and useful information for the use of practicing administrators faced with the challenges of implementing an effective consultation process. The framework for understanding the role of administrators in public consultation can offer a context from which meaning can be drawn by other administrators regarding the events and emotions which are produced during consultations. Second, the framework and propositions generated in this study may be useful starting points for further inquiry.

Significance of the Study

Administrators are now expected to engage in much more direct public consultation in the making of public policy than the role had previously demanded. In keeping with traditions of a neutral bureaucracy, the role of the administrator in public consultation is substantially different from that of the political leader. As a result, contemporary administrators have had very little to guide their actions in the way of academic research or empirical models of effective consultation.

The growing intensity of this issue derives in some part from emerging technologies which allow for a better informed population, and for that population to express its demands in a manner which is timely and effective in the process of policy formation. Specialized interest groups have become more focused, more agile and more easily mobilized. Frequently, they possess technical information superior to that of the policy-makers. Consequently, public demands are being thrust more forcefully upon policy-makers. However, as well, the increasing value of the input from an informed, concerned and committed public indicates that there are often good reasons to seek their views in the formulation of effective policy. The result is an increasing complexity of public issues. At base, however, are the fundamental precepts of democratic philosophy which demand that the interests of the governed be paramount in the actions of those who govern.

Traditionally, it has been the function of political leaders to make choices about who constitutes the public, whether their demands are valid in the wider social context, whether the messages conveyed by their representatives are congruent with the actual wishes of the interests they purport to represent, and whether those demands are relevant to the successful achievement of public policy goals. The long-standing traditions of a non-partisan, apolitical public service, particularly in parliamentary democracies, have reinforced the separation of the political assessment of the public will from the implementation of public policy. However, the ability of political leaders to retain the exclusive mandate for public consultation has been eroded by the enormous technical complexity of the issues, and the pressures of a more involved and articulate populace. Thus, public consultation is becoming a more significant responsibility for administrators, a responsibility which in many ways differs from the political function of elected representatives.

Greater involvement of the public in administration is a relatively recent development. As such, it is an area which has not been well researched, as evident in the literature on political science, public administration or public policy. Public administrators have been left to adapt theories from political philosophy or, more recently, economics, which have only broad applicability to the administration of public organizations.

This research deals with administrators employed in government. There are many contextual and organizational differences in administrators employed in publicly funded agencies such as schools, universities, municipalities and hospitals, as well as those employed in the private sector. Nonetheless, while acknowledging these critical differences, this research is intended to have relevance for all administrators who interact with the public. Indeed, it has special relevance for educational administrators who, while also educational professionals, are primarily public administrators with a mandate to deliver services in one of the most significant areas of public policy, and who have very direct and important responsibilities to the public that they serve.

Context of the Study

The contemporary era of public participation can probably be traced back to its origins in the War on Poverty and Model Cities programs of the 1960's in the United States. These initiatives were aimed at improving the economic conditions of low income citizens by involving the representatives of underprivileged groups directly in decisions as to how their circumstances could be improved (Sewell & O'Riordan, 1976, p. 4). During the activism

of the 1960's and 1970's, the focus of public participation shifted to environmental issues. More recently, attention has shifted once again to issues of governmental reform brought about by a broad-based demand for more responsive government.

The response by various jurisdictions has varied in accordance with their differing political structures and traditions. In the United States, where the adversarial structure of the American administration creates more opportunity for public penetration into the policy process, public involvement has been mandated in legislation. However, the parliamentary democracies provide greater discretionary authority to administrators and afford less public access to policy decisions (Wilson, 1989, p. 297). The United Kingdom and other European nations offer very restricted processes of public involvement (Sewell & O'Riordan, 1976, p. 6), whereas the Canadian experience in public participation tends more toward the American experience. As in the U.S., a great deal of environmental legislation was passed in the early 1970's requiring public participation in environmental decisions. However, the uniquely Canadian contribution to the field of public involvement has been the public inquiry, conducted often, and often conducted on a massive scale. It was the Berger Royal Commission on the Mackenzie Pipeline in 1974 which set the standard for public consultations in Canada (Torgerson, 1986, p. 47) and which continues to be a model emulated throughout the world. Since then, Canadians have more frequently demanded a role in the making of public policy in Canada, and administrators have had a considerably greater degree of public exposure in the making of public policy. In Alberta, however, the experience of public involvement is a more recent phenomena, without specific events of note which might be considered transformational in the evolution of its political traditions.

As a province within the confederation of Canada, Alberta has inherited the foundation of its governing system from British parliamentary traditions. The relative insularity of administrators and decision-making systems in parliamentary democracies in general has been more pronounced in Alberta due to the unique structure of government which has evolved from a boringly monotonous political stability. Alberta has been governed throughout the post-war era by two centre-right parties, beginning with Social Credit followed in 1973 by the Progressive Conservative Party. Each has held long tenure in office with consistent and often massive majorities. The continuing dominance of single parties in Alberta has allowed the growth of a powerful Cabinet system which often has been dominated by an even more powerful Provincial Premier. As a result, opposition parties in Alberta politics as well as the Legislature itself have had a limited role in policy setting, allowing relatively few channels for public involvement. Public access to the

decision system is restricted to a small number of strong interest groups, largely associated with the business community.

The political environment of the Province of Alberta is a direct consequence of violent economic fluctuations (Tupper & Gibbins, 1992, p. 31). Alberta's economic history of cycles of adversity and affluence has developed a distinctive political context in which Albertans have sought to wrest political control over their destiny away from external forces perceived as being responsible for their economic instability. A dependence upon natural resource revenues, primarily oil, created tremendous wealth during the 1970's. These massive revenues were invested in large scale social and economic infrastructure and in efforts to diversify the economy in order to reduce dependence upon unstable international commodity prices. However, these very instabilities brought about a series of major price shocks and declining revenues during the early 1980's which changed the provincial outlook from unbridled optimism and unchecked expenditure to one of caution and restraint, a condition which lingered on into the 1990's and the period of this study.

Arising from this unique political culture is a government bureaucracy which has both benefited from the continuing political stability while also becoming the target of economic restraint. The Provincial bureaucracy has been trained by a succession of conservative governments which have outlived the careers of even the most senior administrators. However, this longevity has created a long standing hostility between the bureaucracy and government characterized by a real tension over where real power lies. During the boom years, the administration was commissioned to make the massive expenditures and build the impressive infrastructure which has been amassed in the Province. However, as those expenditures dwindled, it was the bureaucracy itself which became victim of the inevitable restraint. This further worsened the hostility between administrators and government and brought into sharper focus a power struggle which left little room for the greater involvement of the public in policy making.

Alberta had become known as one of the most closed governments in Canada. However, the rising influence of the environmental movement as well as a heightened awareness by Albertans of the significant issues associated with the Canadian Constitution, gender, aboriginals, and governmental restructuring created a call for greater public involvement in the formulation of policy (Tupper & Gibbins, 1992, p. xxiv). At the same time, Western Canada experienced a resurgence of strong populist political movements which echoed the foundations of conservatism on the prairies. Thus, toward the end of the 1980's, the Government of Alberta had begun to adjust to a new set of players on the policy stage,

allowing and even requiring more public involvement in government and administrative decisions.

For example, in 1985, the Regulatory Reform Office of Executive Council stated that:

> It is now Government policy that all proposed regulations are to be circulated to appropriate interest groups, before the proposal is taken to Cabinet, or a committee of Cabinet, for discussion and approval. (Alberta Executive Council, 1985)

The processes which were used in these and other consultations on policy tended to be of a relatively low profile and often highly technical exercises, usually conducted by advisory or regulatory boards or commissions established to act as an interface between government and the public. In 1990, there were 169 agencies, boards or commissions established under provincial legislation with responsibilities for some area of public policy, in most cases specifically commissioned to gather public input to support those policy decisions (Alberta, Executive Council Office, 1985). However, in addition to these agencies which have a specific mandate to conduct regular consultations as part of their activities, the departments of the Alberta government also conduct public consultations as part of their normal business. During the year in which this study was completed, the Alberta Public Affairs Bureau registered 192 individual consultation events by government departments, often with over 40 public meetings being held throughout the Province during a single month (Alberta Public Affairs Bureau, 1993). The pace of consultation was only quelled by the resignation of the Premier and a cessation of government activity during the leadership campaign and ensuing election. However, the level of knowledge regarding public consultation among managers and executives in the Alberta public service is relatively low. A two day course in consultation is offered approximately four times per year. At the time of the study, fewer than 120 of the 3200 managers in government had taken the course (Personnel Administration Office, personal communication, January, 1994). It is within this context that this study was conducted, a period of considerable activity in public consultation and heightened awareness of its varying contributions to the formulation of public policy.

Research Design

Overview

Interviews were conducted with twenty-three administrators selected from the Provincial Government of Alberta on the basis of their recent involvement in a process of public

consultation, and their willingness to reflect upon and share that experience. Participants were drawn from a range of departments and policy areas within government, and from staff, management and executive positions. The types of consultations represented by these administrators were equally wide-ranging. Defined as any effort to secure direct public input on specific, identifiable policy problems, the methods of consultation included such approaches as advisory committees, conferences, public forums, solicitation of written responses to discussion documents, and surveys, among others. The purpose of the research is to understand the shared experience of administrators engaged in public consultation. The rationale for seeking a wide participation in the research across a range of experiences was to avoid the possibility of having the substantive issues and structured relationships of any one policy area dominate the findings of the research. By taking a wide approach to participation, themes associated with these experiences could emerge unobscured by substantive issues of any one policy area.

After the key themes emerging from the experiences of participants are identified, they are then explored in the relevant literature to investigate what others have written about these themes, and to generate a basis for further interpretation of these experiences. The objective of this investigation is to place the experiences of these administrators into a broader theoretical context and to enrich the value of these experiences.

Finally, the thematic analysis of the experiences of the participants and the evidence from the literature are combined into a preliminary framework for understanding the context of administrators engaged in public consultation. The experiences of the administrators who are participants in this study are the focus of this study, and the literature is used to integrate these experiences into a comprehensive and consistent framework. On the basis of this framework, some propositions are posed as a guide for further research.

Methodological Approach

The purpose of this research is to ground the development of a framework of understanding about public consultation and its impact on the formulation of policy in the experiences of practicing administrators. It is a qualitative study which interprets these experiences through a process of thematic analysis to reveal insights into those experiences. It follows the techniques of grounded theory offered by Strauss and Corbin (1990) who describe a grounded theory as:

> one that is inductively derived from the study of the phenomenon it represents. That is, it is discovered, developed and provisionally verified through systematic data collection and analysis of that phenomenon.

> Therefore, data collection, analysis, and theory stand in reciprocal relationship with each other. One does not begin with a theory, then prove it. Rather, one begins with an area of study and what is relevant to that area is allowed to emerge. (Strauss & Corbin, p. 23)

Strauss and Corbin describe a systematic set of procedures to develop theory which is faithful to the insights of participants. Therefore, this study is based upon the experiences of the administrators participating in this study. These experiences have been interpreted to develop a basis for building theory which may assist other administrators engaged in public consultation to understand their own experiences.

Assumptions

The primary assumption underlying this research is that administrators share similar experiences when they engage in consultation activities. This implies that there are common elements to those experiences which can be recognized by the participants as having meaning for them in their individual experience.

A second assumption is that the administrators are able and willing to discuss their experiences and perceptions with the researcher in an honest and forthright manner. This research is built upon data provided by the participants. Any overt attempt to disguise or misrepresent their understanding of public consultation would not be discernible within the analytical context of this research.

The consultations in which these administrators were involved were directed at specific policy areas which brings with them particular substantive policy issues and traditional relationships between stakeholders. Therefore, a third assumption is that the impact of these issue-specific influences can be minimized by selecting participants from a wide variety of policy areas.

Delimitations and Limitations

Interviews for this study took place between May 26 and November 23, 1992, a period during which the government in Alberta was at the end of its electoral mandate, and waning in popularity. However, other governments in Canada, the United States and elsewhere in the world were also subject to a growing sense of alienation between the electorate and government. Fiscal crises deriving from mounting public debt and resulting in reduced expenditures for public programs created an atmosphere of distrust in public institutions. This political climate may be reflected in the perceptions of administrators participating in

this study. Therefore, the interpretations provided must be limited to administrators' understandings during this specific period of time.

Participants were employees of the Provincial Government of Alberta. Provincial governments have particular legislative mandates and unique organizational and policy environments which are in many aspects different and distinct from other types of government at the municipal, federal or international level. Therefore, while this study may have broad relevance to both governmental and non-governmental administrators, these findings are heavily influenced by the specific context of this governing mandate and environment.

Organization of the Document

This chapter provides an introduction to the study, describes its purpose and significance, outlines the design of the research and defines its delimitations and limitations. The following chapter provides a detailed description of the methodology used in conducting the research and reports some of the contextual findings evolving from aspects of the development of the design.

Chapters Three, Four and Five report the results of the thematic analysis of the interview data. Each of these chapters has a similar structure. The themes emerging from the interview data are reported first. Each of these themes is then examined in the context of the relevant literature in order to investigate what others have written about these themes, and to generate a basis for further interpretation of these experiences. The objective is not so much to validate the findings of the research in the literature, but to place the experiences of these administrators into a broader theoretical context and to enrich the value of these experiences. Finally, the findings from interview data and the literature are integrated into analytical concepts.

To the greatest extent possible, the voices of the administrators participating in this study have been used in expressing these themes. However, in order to protect the confidentiality of the participants, the names of participants have been replaced with pseudonyms. Each direct quotation is referenced to the source with a name and number referring to the record in the interview database in which the reference is to be found. Identifiable references in the quotations have also been replaced with more generic references without altering the meaning or intent of the passage.

Using the experiences of the participants and the evidence from the literature, Chapter Six offers a discussion, interpretation, and further integration of these concepts, building them into a framework for understanding administrators' experiences in public consultation and the formulation of policy. Finally, Chapter Seven draws some conclusions from the study, offers a proposed program of research for continuing development of the proposed framework, and outlines the implications which this research might have for senior administrators, project managers, public participation practitioners, the preparation of administrators and the evolution of democratic government. This chapter also includes a reflective essay on the role of public consultation in contemporary government.

Chapter 2
Methodology

Overview of the Methodology

The phenomenon which is being investigated in this study is that of the shared experiences of administrators engaged in public consultation in the formulation of public policy. The study asks a phenomenological question of what constitutes the structure and essence of experience of this phenomenon for these people (Patton, 1990, p. 69). In adopting this approach, there is an assumption that

> *there is an essence or essences to shared experience.* These essences are the core meanings mutually understood through a phenomenon commonly experienced. The experiences of different people are bracketed, analyzed, and compared to identify the essences of the phenomenon. (Patton, p. 70, italics in original)

From this perspective, it is possible to understand how people interpret and make sense of their experiences. Just to describe these experiences is not entirely sufficient to produce understanding, however. It is in the synthesis of these core meanings that one identifies commonalties which are of use in assisting others to make sense of their experiences when confronted with a similar phenomenon.

Therefore, this study attempts to go beyond description and to begin the process of building theory from the data. To a large degree, it is an emergent methodology which was constructed as the research progressed, led by the experiences of the participants and guided by the requirement to build theory upon these data. It is a process built not so much on generalization, but on extrapolation. As Cronbach *et al* (1980) explain

> unlike the usual meaning of the term *generalization*, an *extrapolation* clearly connotes that one has gone beyond the narrow confines of the data to think about other applications of the findings. Extrapolations are modest speculations on the likely applicability of findings to other situations under similar, but not identical, conditions. (p. 231, italics in original)

As such, the pursuit of a basis for theory built upon extrapolations from shared experiences allows for the vast scope of variation in social phenomena. Rather than the rigid predictability of causality, this approach acknowledges that social phenomena are

substantially influenced and bounded by highly complex and variable contexts which change over time. Cronbach (1975) suggests that generalizations decay over time, that at any one moment, they are at best working hypotheses and not enduring conclusions (Patton, 1990, p. 487). Thus, this study endeavors to draw from the themes present in the experiences of administrators participating in this study, to develop a theoretical framework from which propositions might be drawn to inform the practice of other administrators, and to present a framework which might assist them to understand their own experiences. This chapter, therefore, discusses the development of the methodology used in the study and the contribution which each phase makes towards the development of the theoretical framework.

Assembling the Pool of Participants

In order to assemble a comprehensive pool of potential participants, on May 5, 1992 a letter was sent to each of the 25 Deputy Ministers in the Government of Alberta at that time. The letter outlined the nature of the research and requested the Deputies to identify recent public consultations completed within the previous two years, currently on-going, or in the planning stages. Public consultation was explained as any effort to secure direct public input on specific, identifiable policy problems. Deputies were also asked to identify individuals who held primary roles in the design and conduct of these consultations.

Information sheets were provided to assist in compiling this information and to gather some additional preliminary data about these consultations. One information sheet was to be completed for each consultation providing data on the purpose of the consultation, primary contact persons, an indication of the types of consultation mechanisms used, whether the process was complete, and whether documentation on the consultation could be made available to the researcher. Copies of the Letter of Request and Information Sheet are provided in Appendix A.

The response to this request was overwhelming. Twenty-two of the Deputies responded, supplying information on 107 individual consultations and the names of 175 possible contact persons. Documentation was provided on approximately half of these consultations, amounting to thousands of pages of background material. As responses were received, they were entered into a database recording all data from the information sheet for later analysis.

Pilot Interviews

Pilot interviews were conducted between May 26 and June 26, 1993. The objectives of the pilot study were to outline some of the critical issues and determine whether they reflected a common basis of experience, to identify the characteristics of participants which would be most useful to the study, and to develop the interviewing skills of the researcher.

Selecting Participants for Pilot Interviews

Six participants were selected for the pilot interviews from the responses to the mailout to Deputy Ministers. They included at least two persons who each had the following characteristics:

1. knowledgeable practitioners in charge of units dedicated to consultation on an on-going basis who could provide some background on the state-of-the-art in public consultation;
2. executive level administrators who were familiar with the complete process of policy formulation;
3. staff level administrators with field experience in the consultation process;
4. participants in consultations that were relatively large and comprehensive undertakings;
5. participants in more specific consultations directed toward more focused goals; and
6. participants in on-going consultation mechanisms.

These interviews were very general. As the guide used in these interviews provided in Appendix B illustrates, they were informal, conversational interviews. Patton describes these as interviews in which the researcher

> wants to maintain maximum flexibility to be able to pursue information in whatever direction appears to be appropriate, depending on what emerges from observing a particular setting or from talking to one or more individuals in that setting. Most of the questions will flow from the immediate context. (Patton, 1990, p. 281)

To provide a setting which was most comfortable for each individual, participants were asked if they would prefer to speak broadly on their understanding of public consultation or to discuss the topic with reference to the specific consultation with which they were familiar. In choosing the first, participants were asked about what came to mind, from the point of view of a public administrator, when speaking of public consultation, and what

were the significant considerations in consulting the public. The second approach took the form of a critical incident analysis, in which participants were asked to describe in some detail, the public consultation exercise in which they were directly involved in terms of what they were trying to achieve, who was involved, how the consultation was conducted, and how the results were used.

Findings of the Pilot Study

The consultations described seemed to be technically competent and generally consistent with the processes described in the literature. However, only a few of these administrators had any expertise in structuring consultations. The design of each consultation appeared to be based most often on a common sense approach, reflecting what the respective administrators might expect if they were to be asked for their opinion. However, administrators consistently encountered difficulties incorporating the results into the formulation of policy. Therefore, it is the administrator's understanding of the interface between consultation and policy that is the specific focus of the study.

To acquire an understanding of the context of policy formulation and the policy implementation process, it would be necessary for participants to be drawn primarily from more senior functions in the organization. Staff level administrators quickly lost touch with the process after completion of the consultation. A view prevailed that the consultation process was terminated upon the completion of the report. Some participants from staff functions would continue to be included in the study, however, because they evidenced a very strong sense of attachment to the products of consultation, and to the participants in those consultations.

Finally, there were consistent themes which emerged from these interviews which confirmed the utility of pursuing the shared experiences of administrators engaged in consultation, and in so doing, avoided the dominance of substantive issues associated with consulting in a single policy area. A second, in-depth interview would not be conducted with the participants in the policy study. Instead, new participants would be selected to represent a wider base of experience in terms of both administrative function and type of consultation.

Core Interviews

Selection of Participants

The approach to selecting participants adopted in this study was that of purposeful sampling in which information-rich cases are identified for study. "Information-rich cases are those from which one can learn a great deal about issues of central importance to the purpose of the study" (Patton, 1990, p. 169). The strategy utilized in selecting the participants was one designed to achieve maximum variation in the sample in order to identify themes which cut across a wide basis of experience. A primary concern in the design of this study was the possibility that substantive issues would dominate and obscure the more subtle themes inherent in the experiences of the administrators. By choosing cases which were very different from each other, any common patterns that emerge would be of particular interest and value in capturing the core experiences and central, shared aspects of those experiences (Patton, 1990, p. 172). The primary challenges in the sample selection were, then, to identify information-rich cases which would illuminate the essential themes underlying the experiences of administrators using public consultations in the formulation of public policy, and to ensure maximum variation in the types of cases included in the study to reduce the significance of detailed substantive issues.

The responses received from the Letter of Request to Deputy Ministers were coded in two ways. First, the individual contacts were coded as to their position in the organization. Political positions included Ministers, other elected members, and executive assistants. Executive positions included deputy ministers, assistant deputy ministers, and executive directors. Staff positions included directors and all others. Second, the consultation mechanisms were coded on the complexity of consultation structure. A relatively simplistic consultation format provided information to the public or solicited feedback on proposed policies through open houses, hearings, interest group meetings, or surveys. A more complex process created opportunities for discussion and confrontation between opposing viewpoints through forums, focus groups, and the use of multiple techniques.

Because of the excellent response to the Letter of Request, a large number of candidates were initially available. Therefore, the initial selection was limited to only the primary contact persons, and for consultations for which complete information was supplied. An individual occupying a political position was considered to represent an experience in public consultation which was substantially different from that of an administrator and, therefore, was deleted from possible selection. Similarly, on the basis of the findings of

the pilot study, individuals in staff positions who had no direct contact with the policy formulation process were also excluded. This created a selection pool of 26 candidates.

The consultations with which these individuals were associated were then reviewed for complexity and richness. Pilot interviews had demonstrated that more complex consultations had a greater potential for illumination of the policy implications of consultation, and the contact person was normally in an executive position. Also, an effort was made, first, to select participants from a wide range of policy fields and, second, to avoid interviews with persons engaged in the same consultation. Therefore, after selecting on this basis and on the availability of participants, a total of 19 administrators were interviewed including those participating in the pilot, of whom nine were executives and ten were staff, mostly in positions of director. With respect to the consultations in which these administrators were engaged, six were relatively simple, and 13 more complex. These consultations extended across a wide variety of social and economic policy fields.

Structuring the Core Interviews

The core interviews for the study were conducted between August 17 and August 31, 1992. Appendix C provides the guide used for the core interviews. They were more structured than those of the pilot study, but remained conversational in format. Patton explains that this more structured interview

> provides topics or subject areas within which the interviewer is free to explore, probe, and ask questions that will elucidate and illuminate that particular subject. Thus the interviewer remains free to build a conversation within a particular subject area, to word questions spontaneously, and to establish a conversational style - but with the focus on a particular subject that has been predetermined. (Patton, 1990, p. 283)

The subject of the interview was the process of incorporating the results of consultation into the formulation of policy. Therefore, participants were asked to recount their experience with a specific identified consultation as it unfolded, recapturing as well as possible the sequence of events. Background materials were reviewed prior to the interview to ensure a basis of familiarity with the structure and objectives of the consultation so that the interview could concentrate on its contribution to policy. The interview consequently dealt with three substantive areas: a brief review of the consultation and the participant's involvement in it, the part which the consultation played in policy making, and the utility of the consultation in terms of where the policy decisions were at the time. The interview concluded with some general reflections on the role of administrators in the process of consultation. Field notes were taken during each interview, and

reflections were recorded immediately after each session. As the interviews progressed, the interview guide was refined to capture improvements in lines of questioning and to identify possible probes.

Verification Interviews

After the conclusion of the core interviews, the transcripts were analyzed as described below. A central component of this analysis was the construction of a story line in which the key concepts of the analysis were integrated into a descriptive narrative about the central phenomenon in the study (Strauss & Corbin, 1990, p. 119). This story line represents a conceptualization of the process through which the key themes are presented in sequence to show possible linkages. In this case, the story line recaptured in an analytical way, the sequence of experiences described by the participants as they used public consultation in the formulation of public policy. This story line became the basis of a series of four verification interviews with four Deputy Ministers who had demonstrated an interest in the use of public consultation, and who had responsibility for departments that had engaged in the extensive use of consultation in the formulation of policy. This brought the number of administrators interviewed in the study to a total of 23.

The guide used in these interviews is provided in Appendix D. The purpose of these interviews was to explore the central themes and relationships developed in the story line with the participants. These interviews were also conversational but were more specifically directed toward the discussion of the various themes emerging from the analysis and the possible relationships among them. Instead of requesting the participants to recount their own experiences, during these interviews the Deputies were taken through the story line, in order to verify that these experiences were consistent with their own, and to investigate areas of inconsistency. Consequently, as opportunities arose throughout the interview, themes in the story line were further developed and explored through direct and intense questioning.

The primary themes and relationships were verified in all of the interviews. However, it was notable that in each interview, the flow and content of the conversation was not substantially different when the sequence of events was presented by the interviewer, from when the sequence was determined by the experience of the participant in the earlier core interview. During one session in particular, it was difficult to determine who was leading the interview as the topics emerged naturally in conversation. Thus, it was concluded that

the story had captured something of the essence of the shared experience of administrators engaged in public consultation.

Data Analysis

The technique which generally describes the style of the analysis is that of thematic analysis. While the techniques associated with thematic analysis have been widely discussed (Carney, 1979; Mitroff & Emshoff, 1979), they remain inherently intuitive, unstructured and heuristic. Turner suggests that

> a grounded theorist is not able to mask poor-quality work behind an array of impressive techniques, for what he is doing is very open to scrutiny. The quality of the final research product arising from this kind of work is more directly dependent upon the quality of understanding which the research worker develops during the course of the investigation than is the case with many other approaches to social inquiry. (Turner, 1981, p. 227)

Very broadly speaking, the process of identifying the salient themes followed the coding techniques outlined by Strauss and Corbin. They describe a progressive process of open coding, axial coding and selective coding. Open coding refers to the initial process of examining, conceptualizing and categorizing the data.

> During open coding, the data are broken down into discrete parts, closely examined, compared for similarities and differences, and questions are asked about the phenomena as reflected in the data. Through this process, one's own and others' assumptions about the phenomena are questioned or explored, leading to new discoveries. (Strauss & Corbin, 1990, p. 62)

Each of the core interviews was recorded on audio tape and transcribed by the researcher. Transcripts were read and re-read to identify the critical elements of meaning for the participant. The objective was to take each point in the discussion and to distill the essence of what the participant was saying into a few relevant words. Each of these meaning units was then transferred to an electronic database and keywords representing the relevant concepts were attached for easier manipulation. At the completion of this phase of the analysis 474 meaning units were identified with 211 concepts.

Patton refers to this stage as the "horizontilization" of the data in which the data are spread out for examination, with all elements and perspectives having equal weight (Patton, 1990, p. 408). Once the data are exposed, they are then organized into clusters. This is what Strauss and Corbin refer to as "axial coding" in which the data that have been fractured by open coding are subsequently reintegrated in new ways to make connections between

categories of concepts (Strauss & Corbin, 1990, p. 97). The purpose is to identify consistencies among concepts and thus the experiences of participants.

In this study, the various concepts were collapsed into progressively fewer categories until each category was saturated. This refers to the process of collecting concepts within a category until the researcher has a confident understanding of the nature of the category and is capable of discriminating between concepts which pertain to the category, and those that do not. Any new concepts can then be accurately classified (Turner, 1981, p. 235). Patton describes this process as one of delimitation "whereby irrelevant, repetitive, or overlapping data are eliminated. The researcher then identifies the invariant themes within the data" (p. 408).

This process was greatly simplified by the use of compatible electronic data systems which allowed the researcher to compare quickly the actual text of the interview with the key concepts and, subsequently, with the broader categories. Observations could be easily noted electronically in the process. Source locations were always attached to key concepts as they were aggregated into categories. The researcher was then able to move easily between the interview data and the analysis, constantly able to rethink and reorganize the material. The critical advantage in this technique was that it was the primary data of the participants' experiences which were being used throughout the analysis, rather than the progressively more abstract concepts and keywords which composed the secondary data.

The final phase of thematic analysis was that of "selective coding", in which each category is related to the other categories. This is the final integration of the data into a theoretical framework through the identification and explication of relationships among categories. It is a process which begins with the identification of the core phenomenon, systematically relating it to other categories, verifying those relationships, and filling in categories that require further refinement and development. Strauss and Corbin (1990, p. 116) suggest that the process begins with the articulation of a story line, or a descriptive narrative of the central phenomenon, which then provides the basis for the development of the framework. In this study, the story line was used as the basis for the final set of verification interviews with Deputy Ministers in which the themes and relationships articulated in the story were confirmed and illuminated.

The final stage in this process is to lay out the theory. Patton refers to this as the development of a structural synthesis.

> This synthesis will contain the "bones'" of the experience. . . . In the structural synthesis, the researcher looks beneath the affect inherent in the experience to deeper meanings for the individual. This reveals the essence of the phenomenon. (Patton, 1990, p. 409)

In this study, the literature was used to develop a structural synthesis, and to construct a congruent context within which these experiences could be described, explained and illuminated. The purpose of adopting a grounded theory approach is to discover new concepts in the experiences of others. This presents a quandary for qualitative researchers. More traditional approaches to quantitative research use the literature to generate potential questions and theoretical frameworks in advance of the analysis. However, as Strauss and Corbin suggest

> it makes no sense to start with "received" theories or variables (categories) because these are likely to inhibit or impede the development of new theoretical formulations. (p. 50)

Patton agrees that "because it may bias the researcher's thinking and reduce openness to whatever emerges in the field . . . a literature review may not take place until after data collection" (p. 163). Because of the relative paucity of work in this area, the danger of starting with received theories did not present this researcher with a serious problem. Therefore, upon the completion of the formal analysis of the data, the themes presented were then explored in the relevant literature. This approach provided for an enriched understanding of the themes which emerged from the experiences of participants, through the application of more general conceptualizations available in the literature. The resulting theoretical framework therefore is grounded in and framed by the experiences of practicing administrators, while also incorporating the findings and considerations of other research to structure the theoretical relationships. The provisional framework is verified by those experiences to further their understanding and to enrich the framework.

Enhancing Theoretical Sensitivity

An essential characteristic of developing theory which is grounded is the capacity of the researcher to be open to a variety of interpretations of the data. Strauss and Corbin refer to this as theoretical sensitivity or "the attribute of having insight, the ability to give meaning to data, the capacity to understand, and capability to separate the pertinent from that which isn't" (p. 42). Undoubtedly the greatest theoretical sensitivity grows from a familiarity with an extremely broad base of writing in the field. However, sensitivity also derives from personal and professional experience, and from the opportunities presented to develop new propositions and test conceptualizations.

A program of research must have a point of departure, a guide to the researcher focusing attention on the areas that need investigation without prejudging their importance. To provide such a guide, a conceptual map (Brunner, 1982; Maynes, 1990) or sensitizing framework (Patton, 1990) representing the researcher's initial understanding of the critical components in consultation was developed. This map was useful in identifying at the outset the presuppositions of the researcher entering into the interviews, and in directing the initial interrogation of the texts of those interviews. The objective of the research is to obtain insights into the understanding of administrators. Consequently, the map was quickly displaced by the themes of the participants emerging from the study, although some components have re-emerged, transformed and confirmed by the experiences of the participants.

Sensitivity was also enhanced by maintaining contact with a wide variety of persons involved in various forms of public participation. After completing the core interviews, the researcher attended an international conference of public participation practitioners which provided an opportunity to discuss observations and possible interpretations with a number of persons with extensive and varied experience in the field. The following year, some preliminary findings were presented at the same conference, offering further opportunities to refine the interpretation. During the development of the theoretical framework, the researcher participated in the design of an extensive public consultation for government through which some of the proposed theoretical propositions could be explored and discussed with colleagues. Through these experiences, as well as by following closely the progress of consultations with which the researcher had come into contact, it was possible to explore new conceptual possibilities and theoretical propositions.

Enhancing Rigor and Trust

Guba and Lincoln suggest that the question which confronts all inquiry is relatively straightforward. "What arguments might the [researcher] use to persuade a methodologically sophisticated peer of the trustworthiness of the information provided and the interpretations drawn from it?" (Guba & Lincoln, 1981, p. 103) Researchers working within the quantitative tradition establish trust by demonstrating through rigorous testing that their measurement instruments are valid and reliable within defined standards of acceptability (Sandelowski, 1986, p. 30). However, in qualitative inquiry, the researcher is the instrument, and, unfortunately, human researchers are notoriously difficult to calibrate, and constantly defy testing and standardization. Qualitative research must be no less rigorous for it to be trustworthy. However, standards of rigor must be applied to the

trustworthiness of researchers and their conclusions. Therefore, in answer to their own question, Guba and Lincoln (1985) suggest that the trustworthiness of research is dependent upon the concepts of credibility, transferability, dependability and confirmability (p. 296).

Credibility

Internal validity refers to the extent to which observations are "authentic representations of some reality" (LeCompte & Goetz, 1982, p. 32) and not an artifact of the research instrument itself. Guba and Lincoln (1981, p. 105) use the parallel concept of credibility. A qualitative study is credible when it presents a faithful description or interpretation of a human experience which people having that experience recognize as their own (Sandelowski, 1986, p. 30).

Sandelowski suggests that the strength of qualitative research is the credibility of the subjective involvement of researchers in the phenomenon, that is "interpreting their own behaviour and experiences as researchers in relation to the behaviour and experience of subjects" (p. 30). In this study, the experiences of the researcher in many aspects of policy development within government as well as in designing and conducting a number of public consultations prior to and during the research were of critical importance to the interpretations of the experiences of participants. However, this closeness to the phenomenon is at the same time a threat to the credibility of the study as researchers may be unable to separate their experiences from those of the participants. This difficulty is not only possible during the analysis, but also in the collection of interview data.

In order to "bracket" the perceptions of the researcher and allow the experiences and perceptions of the participants to emerge, a number of steps were taken to ensure that the core interviews allowed for an unconstrained conversational environment for participants to recount their experiences. First, the interview guide was reviewed by a professional colleague of the researcher with considerable experience with the development of research instruments and an uncanny ability to identify leading, difficult or deceptive questions. Second, two of the participants and the consultations with which they were engaged were well known to the researcher. At the conclusion of the formal interview, a second discussion took place in which participants were asked to evaluate the interview in terms of the sequencing of questions, the degree to which the responses of participants were led by the interviewer, their reaction to being recorded, and the extent to which they felt that the interview captured an accurate reflection of the experience. It also allowed the opportunity

to explore shared perceptions on the specific consultation held by the researcher and each participant. Finally, during the course of these interviews, the researcher checked perceptions and developing themes with two senior administrators, also well known to the researcher, who had both an intellectual and a substantive interest with the issues under investigation. These discussions took the form of informal and unrecorded conversations to confirm perceptions and explore possible explanations. They also offered an opportunity to get a sense of how recording interviews affected the forthrightness of the participants' responses. Each of these exercises provided continuing external reference points for the researcher to examine interpretations, and each was a constant reminder of the importance of honesty in the conduct of credible research.

Transferability

Transferability captures the concept represented by external validity or the ability to generalize the findings to other populations. The notion of generalizability was discussed above in regard to Cronbach's concept of extrapolation on the basis of shared experience rather than generalization based upon causality. Transferability then refers to the ability of an audience to view the findings as meaningful and applicable in terms of their own experiences (Sandelowski, p. 1986, p. 32). It also refers to the degree of "fit" between the data and the findings, and between the context in which the findings were generated, and the context to which they are to be next applied (Guba & Lincoln, 1981, p. 120).

The design of this study utilized a method for the selection of participants which included a wide variation within the phenomenon of administrators' experiences with consultation, in order to emphasize the common aspects of those experiences. The design used an ever-widening circle of participants in which the common experiences of one group were confirmed and explored with another group encountering that same experience, in effect triangulating their experiences with the experiences of others. This continuing process of comparison culminated with the verification interviews in which the preliminary findings were presented to four Deputy Ministers in order to explore the central themes and relationships. While these were verified in the interviews, the real confirmation came in the immediate identification with the story line on the part of the Deputies, indicated by the free flow of conversation during these interviews, the ready grasp of the essential components, and the ability to discuss these concepts without extensive preliminary explanation. Therefore, by constantly applying the findings from one group to another, and by refining and re-interpreting with each subsequent iteration, the transferability of findings was continually enhanced.

Dependability

Dependability refers to consistency or reliability of the findings. In the quantitative tradition, this would require replicability, that identical findings could be achieved by another researcher following precisely the same method. The instability of social phenomena defy replication and it is therefore necessary to shift the focus to the researcher, and to the question: Would other researchers, given the same data and generally the same constructs, come to the same understanding of the phenomena? (LeCompte & Goetz, 1982, p. 32)

Basic to the concept of dependability is the audit trail, or a documentation of the progression of events, describing and justifying what was actually done and why, so that other researchers can understand the logic (Sandelowski, 1986, p. 34). Each direct quotation from participants is referenced in the text to their location in the database. Within the limits of confidentiality, the tapes and transcripts of interviews, coding structures, databases, and analytical spreadsheets are available for review. A journal of observations was also maintained throughout the project documenting events, observations, and the rationale for various significant decisions. However, the most comprehensive auditable document is this dissertation which reports the evolution of the methodology and summarizes the sequence of decisions underlying that evolution.

In addition to the audit trail, the preliminary findings of the study were subjected to an e· amination by peer researchers. Prior to the round of verification interviews, a peer review group of fellow doctoral students was provided with a copy of the story line and copies of two transcripts chosen at random, and asked if the story line reflected the experiences reported in the transcripts. The four members of the review group participating in the exercise confirmed that the findings were generally consistent with the experience reflected in the interviews. The members were then provided with the coding structure used to analyze those data and requested to examine and code the sample interviews. Again, there was considerable consistency in coding the interviews, with no member of the review group offering a consistent difference of opinion. Thus, it is reasonable to assume some degree of dependability in the interpretation of the data. However, much more significantly, the insights of the members of the review group regarding the interpretation of the data enhanced the analysis considerably.

Confirmability

Confirmability addresses the concepts of neutrality and objectivity, issues which have little relevance to qualitative inquiry given its dependence upon subjective experience (Guba & Lincoln, 1981, p. 124). Confirmability simply means that researchers report their data in such a way that they can be confirmed from other sources if necessary (p. 126). Sandelowski suggests that confirmability is achieved when credibility, transferability and dependability are achieved (p. 33). This is probably the most thorny issue dividing the quantitative tradition and qualitative inquiry for it subsumes within it, both the strengths and weaknesses of the arguments made for credibility, transferability, dependability, validity and reliability. It brings to the fore the fundamental philosophical antagonism between subjective and objective inquiry, and it uses a proliferation of terms and conceptualizations. Brink (1991) observes that

> in the literature on reliability and validity, I found the terminology execrable! We have so many terms to cover exactly the same concept. Nobody is talking to anybody. Anybody who does anything at all on reliability and validity makes up a new term to cover what has previously been discussed in another setting and in another field. (p. 163)

Rather than to contribute to this proliferation, it is best to return to some simple concepts. Trust is essential to all research and it is incumbent upon the researcher to rigorously and persuasively convince the reader and fellow researchers of the trustworthiness of the study and its findings. However, at base, all the researcher can do is to put forward a faithful description of a phenomenon, to demonstrate that the description is meaningful in terms of the experiences of those familiar with the phenomenon, and to provide sufficient depth in the description so that other researchers, given the same data, would likely come to a similar understanding. Further than that, it is the findings of the research itself which must stand on their own merit.

Ethical Considerations

The nature of this study is not one which exposes the participants to significant risk. On the contrary, participants expressed considerable interest in the opportunity to consider some of the issues under investigation in a reflective conversation with an independent researcher, and to benefit from the research findings. The degree of risk to participants is limited, first, to possible professional harm resulting from disclosure of contents of the interviews either to the public or to significant peers; or second, to political embarrassment of the government resulting from inaccurate reporting. Some sensitivity on the part of the

researcher is required to the possible predicaments to which an unfortunate remark could lead, particularly when taken out of context. It is not the intention of the research to attack the actions of individuals or the government of the day, but rather to seek an improved understanding of our democratic processes. Therefore, measures were taken to ensure that participants were adequately informed of the nature of the research and their participation in it, that confidentiality was maintained, and that data were reported accurately. The interests of the participants remain paramount. Therefore, regardless of the value to the research, any data resulting in unavoidable damage to participants have been deleted from the study. In the final analysis, however, this option was not exercised often and had no substantial impact on the findings.

This study was designed to conform with the ethical guidelines provided in the *University Standards for the Protection of Human Research Participants.* (University of Alberta, 1991). Particular attention was given to the following aspects of the these guidelines.

Informed consent

Although the pool of possible participants was compiled through a request to the Deputy Minister of each department in the provincial government, selected participants were approached directly by the researcher. The letter of request provided in Appendix A outlined the purpose of the research. The nature of the study required a clear understanding of the purpose of the research by the participant, and so a preliminary discussion of the study took place either when participants were initially approached or as an introduction to the interview.

Participation in the study was entirely voluntary, and the right of the participants to opt out could have been exercised at any point by declining any further participation. Each interview was recorded on audio tape. However, as the interview guides provided in the appendices indicate, prior to each interview, the participant was assured of the confidentiality of the interview and offered the opportunity to conduct any part of the interview without a recording.

Anonymity and Confidentiality

The anonymity of participants and confidentiality of the information provided was assured initially in the letter of request, subsequently when the participant was contacted, and again at each interview. In order to support this assurance, the specific substance of interviews is not discussed by the researcher in such a manner as to reveal its source, and participants are

identified only by pseudonym in any published materials. The identity of participants is known only to the researcher, and no participant has been informed of the identity of any other participant. The audio recordings of these interviews were transcribed for the most part by the researcher and any done by other parties were identified only by pseudonym. All recordings, transcripts, and analyses are held in a secured location.

The objective of this research is to inform the practice of administrators. The design of this study enabled the participants to reflect upon their own experiences in public consultation and to discuss those experiences within a protected environment. Ultimately, the findings of this research will be shared with the participants enriching their understanding and possibly enlightening their actions in the future.

Chapter Summary

This chapter details the specific methodology used to conduct the study. The purpose of the research is to develop insights into the shared experiences of individuals engaged in a common phenomenon and to synthesize these into a basis for the development of theory. This research is based upon interviews with 23 administrators who were each engaged in a process of public consultation. The sequence of interviews began with a pilot study which established the basic issues to be investigated in the remainder of the study. Following the pilot study, participants for core interviews were selected to achieve maximum variation in the shared experience in order to identify more easily the common patterns emerging from those experiences. These interviews allowed participants to describe their experiences in a free flowing conversation recounting the sequence of events in a relatively unstructured manner. The final interview phase was composed of a series of verification interviews in which the preliminary interpretation of the core interviews was taken to a selection of Deputy Ministers to confirm and expand upon the findings.

The interview data were analyzed through a progression of coding procedures through which consistent themes could emerge from the data. The culmination of this process was the development of a story line, or descriptive narrative of the central phenomenon being investigated. This story line served as the basis for the verification interviews, and the basis for the development of the theoretical framework. Each of the major themes was then explored in the relevant literature in order to expand, enrich and illuminate the experiences of the administrators participating in the study. The integration of the participant data and the literature then yielded the basis for the theoretical framework.

The primary objective of qualitative research is discovery, based upon the data provided from the experiences of individuals engaged in the phenomenon. This requires a sensitivity to a variety theoretical possibilities deriving from a familiarity with the phenomenon on the part of the researcher. However, this familiarity also provides a threat to the trustworthiness of the data. Therefore, this chapter discusses the use of a sensitizing framework and the personal experience of the researcher. It also documents the actions taken to enhance the rigor and trustworthiness of the research in terms of establishing credibility, transferability, dependability and confirmability of the findings. The chapter concludes with a discussion of the ethical considerations encountered in conducting the study, and the steps taken to ensure that participants were not exposed to significant risk.

The methodology used to conduct this study was not predefined, but emerged in response to the data and the experiences of the participants as reflected in the interviews. Judgment is exercised by the researcher on many fronts creating continuing entanglements of methodological, philosophical, ethical and pragmatic issues. A significant feature of the emergent methodology developed in this research is the involvement of a peer debriefing group of doctoral students who have similar research interests, and yet, have adopted different methodological approaches. These individuals have been invaluable in challenging the consistency of the philosophical basis for the study, providing alternative perspectives on methodological decisions and the researcher's interpretation of the data, and ensuring that ethical considerations are attended to effectively.

Chapter 3

The Role of Consultation in the Policy Process

Chapter Overview

This chapter discusses the precipitating conditions for consultation arising from the changing environment of public policy and the demands of the policy making process. It begins by recounting the perceptions of the administrators participating in this study concerning the contemporary evolution of consultation within the rapidly changing environment of government. Next, the understanding of these administrators regarding the role which consultation plays within the policy process is described in terms of the purposes which the consultation served and the strategies that they employed to achieve those purposes. The themes which emerge from this understanding are then explored in the relevant literature to provide a basis for interpretation. The chapter concludes with a summary of these perceptions and the findings relevant to the changing context of public consultation, the structure of the policy process in an administrative bureaucracy, and the purposes which consultation plays in the formulation of public policy.

The Changing Environment of Public Consultation

Traditionally, the making of public policy has been a process internal to the operation of government and has been structured by the relationship between elected representatives and public administrators. Clients and stakeholders were often peripheral to the process and decision making was not open to public view. Many of the administrators in this study commented that the involvement of the public in policy making had changed substantially over the past decade. As one administrator observed, "Five years ago, a lot of people in this department wouldn't buy any of these ideas. Now . . . you can see the pendulum swinging." (Glen 23) Another voiced similar experience:

> In public consultation, the rules have changed a lot. I've been with the government for the past ten years, and public consultation wasn't even, you never even heard of it ten years ago, and now everything is public consultation. (Jan 11)

One administrator explained the shift toward greater public involvement as motivated by the need to understand better the policy environment:

> I think [public consultation] is very important. Perhaps more so now than ever before, with government being short of money to meet perhaps all of the demands that it was able to 10 -12 years ago. I think it's more important than ever before that communication links be established with the clients that we serve in order that we can remain as responsive as we can be to the needs that they have within the resources requirements. It's also important that the clients are aware and appreciate the difficulties that government faces in relation to the available dollars, and that we can't meet all the needs in the ways that we have grown accustomed to. (Bob 02)

Another explained that the increased complexity of the policy environment was not just fiscal, but that there was no longer a consensus on the role of government and the limitations of governmental action:

> There is a whole series of things. It is a much more complex environment. What government is expected to do now is much different in some respects from what it was before. There is an expectation that government should be able to do quite a bit. . . . The solutions now are not simple. In some respects, we had a fairly good economy, things were going fine, and a lot of the work of government was to build infrastructure, look after people that were unemployed or had certain problems, look after education, essentially keep the society going and dabble a little here and there in supporting industrial development. There seemed to be a fairly defined role. Everything was manageable. Suddenly, when you've got 10% unemployment, it's a lot more difficult. You don't have the resources anymore.(Kent 02)

This administrator went on to suggest that the greater involvement of the public was a result of the declining confidence in the processes of government:

> In the past, it has been easier for governments to do things *in camera*, because it doesn't provide an opportunity to build up a lot of opposition to things or a lot of discussion. It's not necessarily the government's intention to be secretive. It's just that in the past there hasn't been the level or degree of interest or concern by the public to be in consultation. It may also be a question sometimes that government's are less sure of themselves. As a result they are going back to the public a second and third time. (Kent 02)

Another administrator suggested that the declining confidence was based on a fundamental lack of trust in government:

> I think people do not have the same element of trust in their political representative as they did yesterday. They want to be a part of the decision making process, or at least to be consulted. And trust is one of the basic frameworks for our society, to be able to vote a representative into the democratic process and to have that person represent you in the political context. And we have seen political decisions that don't totally satisfy the public. And there has also been this participatory element surfacing, that is driven by dissatisfaction and to a large degree by missed trust. (Jim 19)

As a result, administrators have identified public consultation as a significant component in the policy process:

> I think the public is demanding it. The issues we're facing, the media is prompting this to some degree. I think politicians are getting on the band wagon. They're elected, they want to keep informed, they want [public] input, a lot of it sincerely. With the issues, the economy is changing, people are worried about the future, . . . somebody has to bite the bullet, so "let's find our how the public feels." (Ed 17)

The motivations for consulting the public are diverse, and from the point-of-view of administrators, there are a number of reasons why legislators should engage in public consultation:

> They have their reality. Their reality is the political world, the constituents, public opinion . . . I think there are some enlightened ministers who are concerned about the total public and believe that they have a mission to provide the best for the citizens. I believe that there are others who are very focused on how you survive within their portfolio. Maybe the political interests, how the political questions are going to play. So I think there is a mixture. It really gets down to individual minister's style. There are some ministers who are much more open to the public and they are concerned about the public (Gord 38)

The impact of greater involvement of the public is transforming the role of the legislator. This administrator used the metaphor of the legislator as either a compass or weathervane:

> So I think that public involvement is becoming a real cornerstone. [Legislators] are even becoming criticized for not being decisive, they are always saying, "Well, what did the public think?" They are becoming weathervanes instead of compasses. Maybe that's a problem going out too far the other way. (Glen 13)

However, in this administrator's view, the weathervane role is becoming the political norm:

> That's the weathervane. They're becoming more interested in having those solutions. Good ideas are nice but good ideas that work are priceless. . . . The minister is in his weathervane role rather than his compass where he would have some sort of strategy, government strategy or policy. . . . But he has the authority to make the final decision. He has the authority to make good decisions. He has a responsibility to make good decisions. . . . And the good decisions are the ones that people have participated in creating them, and shared formulation of this policy. (Glen 23)

Summary

The environment for making public policy has changed substantially over the past decade. Whether this is due to the lack of confidence which legislators have in their ability to

interpret clearly the public interest or to the declining trust of government by the public, the fact remains that public consultation has become a significant component of the policy process. This rapidly changing environment and the externalization of the policy process through greater public involvement has resulted in challenges to the traditional role definitions assigned to the public, the legislators, and administrators. To a large degree, it is the administrators who are left with the challenge of how these new roles are to be implemented within the administrative context.

Administrator's Understanding of Consultation within the Policy Process

The interviews with participants were opened with a discussion of why they wanted to consult the public, and what they were trying to accomplish in the consultation. This provided information on both the policy objectives served by the consultation and the general strategy utilized in the consultation process to meet those objectives.

Demands of the policy process

In general, each participant typically engaged in consultation at only one stage of the policy process. However, among all the participants in this study, consultations were conducted throughout the process for the purposes of issue identification, identification of alternative strategies, implementation of policy choices, and evaluation of policy outcomes.

Issue Identification

Issue identification refers to the open ended exploration of issues. This exploration was reflected by one administrator who sought a common vision:

> The industry was fragmented, it had different views of where it ought to go, and we finally agreed . . . that we would all be better off, both industry and [government] would be better off, if we had a common target. As a department, we couldn't have a common target until we knew what the target was of industry. So we said, "Let's put them together, let's ask them to come together", and quite a simple objective, "Can we set a common target? Can we get them to set for themselves a common target? Can we get a common vision for the industry?" (Adam 09)

Others attempted to enumerate the issues as an initial starting point "to get a range of concerns, by consensus if possible. Everybody would agree that they were a concern, but not necessarily their concern." (Jim 06) Along similar lines, another administrator "took

the view that this was not so much an opportunity for the public to get answers . . . , but more as an opportunity for the public to raise issues of importance to them." (Lisa 09)

Another approached the consultation with a more refined focus, based upon the recognition that there were existing problems:

> Nothing seemed to be happening in Alberta or Canada, the [program] didn't seem to be going anywhere, governments didn't seem collectively to have any ideas about how to improve things. There was some appreciation of the fact that government was recognizing that there was a need to go out and consult with people with respect to their ideas on how things could be changed. . (Bruce 21)

However, for one administrator, involving the public in the identification of issues was inappropriate "unless you are questing, and then you say 'Hey folks, I'm fresh out of ideas, give me all your thoughts and I'll sift through them.'" (Peter 10) For this administrator, consultation at this stage was tantamount to an admission of failure.

Identification of Alternative Strategies

Administrators used consultation to identify alternative strategies which can satisfy the policy objective. One participant said, "We ask a small group of people how to solve a particular problem or how to approach a specific issue." (Adam 02) Another moved to public consultation:

> Where you have a rough idea of the problem and a rough idea of some potential solutions. You then go out and say, "What do you think about these, and what do you think about others?" And then you see if you have some fresh and new ideas and you can then add to the range of alternatives that you will consider and ultimately present to your minister. (Peter 14)

In both of these examples, the results of the consultation are returned to the administrator for further action and for the selection of an appropriate strategy. However, in another example, the results had a more direct impact on the determination of policy:

> We're going to ask [the public] to suggest a range of . . . strategies, by which they can reach the . . . goals that they have established . . . . [T]hat group of people can debate them, compare the policy options and strategy options against the goals, and agree on which strategic options will most likely lead us to the goals that they established. That will be a Government White Paper. (Adam 28)

Implementation

The participants who engaged in consultation during the policy implementation phase, did so for two reasons. The first was to ease the process of implementation through public participation in the implementation decisions:

> To basically ensure that there was adequate and effective communication with the local community . . . and that there was an avenue there to allow direct feedback in terms of both knowing what was going on, and being a part of where the project was going. In terms of [the project] per se, that was an engineering decision. (Alex 1)

This approach to consultation was particularly evident in those administrators engaged in large scale engineering projects:

> When you think of the public interface, it's a little closer to when you're going to go out and do something on the ground. . . . So usually, our [departmental] rule of thumb is when you're ready to go, when you've got what we call a functional plan, it's not an engineering design, but you've got a plan that you can lay out. (Julie 20)

The second purpose in consulting during implementation is to identify possible barriers to implementation. As one administrator suggested, "Sometimes you have a very good idea about what you want to do, and you give a dry run with people to find out what their reactions are. I think that's fair." (Adam 08) Consultations in these instances are seeking:

> Information that tells us about the practicability. And I suppose as well, information from a public service point of view, about any particular position that special interest groups are going to take for possible forewarning of political fallout. That's a very key component [of the consultation]. There was an instance where there was a whole lot of potential for political action, not on the election ballot but certainly with politicians, that would see a whole lot of [energy] expended on something that could be avoided and we avoided it. (Peter 12)

Administrators offered some specific reasons why consultation should be reserved until late in the policy process:

> Because if you consult really early, . . . two things happen. . . . If you consult really early before you are ready to go and have a firm commitment to do something, either you raise a bunch of concerns that'll just brew for a long, long time, or you get no interest whatsoever. (Julie 19) . . . And I know that sometimes people feel that often they want to be consulted really early, but until you've got "We're going to do this, and we're going to do it [soon]", I don't know why you consult on it. (Julie 20)

Another administrator felt consultation to be redundant at earlier stages:

> I prefer the situation where we go to the public with a very definite idea about what we are going to do and say, "What do you think", as opposed to going to them and saying, "We've identified these problems, what do you think? Are they real problems?" Then, after they say, in many cases they say, "Yes", then you have to go back with some solutions. (Adam 09)

Evaluation

One participant observed that traditionally, public consultation has been most frequently used in the process of evaluation as a check that program objectives are consistent with client needs, or "to keep our programs current and viable in terms of Alberta communities today". (Jeff 05) This individual went on to illustrate the connection between the review of past policies and future policy development:

> The question is "Are the things we are doing effective in terms of what we stated as our objectives, and for you in terms of your partnership with us? What are the things we can change?" So it's almost more like an evaluation process than a consultation process, but sometimes those things are synonymous. (Jeff 07)

> There are two objectives. What you've done, how well you've done it, and what effect you had with that. So we're looking at measuring something. Secondly, looking at the future process. "Are we on the right track? Do we need to continue X program or Y program? What are the things that we need to change?" . . . (Jeff 24)

Another administrator indicated that consultation for evaluative purposes "is useful when you have a longer term initiative. It isn't a simple one time . . . issue or project that you want some input on. It's a longer term either review of what you are doing currently or to provide some direction or guidance for the future." (Julie 03)

Receiving the results of evaluation is sometimes difficult, and for some it requires an openness to criticism that is not within the character of the individual or values of the organization. A routine review of one program was requested by the responsible minister. For the administrator to whom the request was addressed, the evaluation was unnecessary:

> I wanted to hear that as much as possible that we were achieving the mission and mandate of [the agency]. . . . It was about that simple. I also wanted to hear people's ideas about where we were wasting money. Quite frankly I knew a lot of areas, some areas where we were wasting money. What we were after was some honest measurement of how well we were doing the job and some ways and means and possibly support for new ways of doing things. . . . And I think we achieved both of those objectives reasonably well. (Bob 07)

The personal and organizational constraints within which this person was operating generally precluded responsive action, as the results were a foregone conclusion:

> Sure in relative terms, we're always interested in what [clients] feel, what kind of a job we're doing .... They always complain of course, and we expect that. I mean nothing's perfect, they always want more. So our prime interest is from the perspective of "Show us people that can't [access the program]." We all complain about not enough money, but how well are we really doing in ensuring that anybody who really wants to ... can? Is there evidence out there that they're not? Thank God so far we have found precious little of that, notwithstanding the headlines about the thousands who can't ... because we're too [stingy] .... And we've found we couldn't solve all of the problems. Some of the problems they told us about we knew about, but we just couldn't get the money for the expansion of the program in certain areas. (Bob 07)

The administrator who provided this comment is not unique, and is possibly being more honest than others about the personal control exerted over the process and its outcomes. Administrators employ public consultation at all phases of the policy process. However, in most cases the consultation is an external loop in a policy process that is otherwise internal to the organization. The stage of the process at which consultation is required sets certain requirements for the consultation, and creates questions which must be answered. The results of the consultation will be returned to the continuing policy process. It is the administrator who must determine the requirements of the policy process and, in response, choose a strategy for the consultation.

Consultation Strategies

In discussing the purpose of consultation in the formulation of public policy with the participants, it was apparent that there was a substantial difference between the requirements of the policy process and the manner in which the consultation would fulfill those requirements. Two major themes emerged as administrators discussed why public consultation was required. The first relates to the information requirements of the policy process and second, the need to support or amend the relationship with stakeholders, clients or the general public.

Information

The primary strategy in consultation is gathering information to support decision making. Typical of most participants, the initial task for this administrator was the summarizing and analyzing of public input:

> [The] information is being categorized, and weighed, and measured as much as we can do it without distorting the information. Right now the first step is to give the [agency], and ultimately the public more or less a running list of what was said, without any commentary. Although it might be construed as manipulation, distortion on our part, it'll just be the comments almost verbatim, but put into some sort of structure. (Lisa 08)

For some, this is the complete strategy, the collection of previously or apparently unavailable information on the perspectives of segments of the public on certain issues:

> We involve all the departments in the process, so that they hear directly what [clients] are saying. And when the department looked at the areas that [clients] are commenting on, . . . we provided the information. . . . My role is not to advocate, as such, but to ensure that the information that we have received is conveyed, and properly and responsibly represented. And when . . . it is appropriate, when there is an opportunity, and people say "what did you hear", of course you say, "we heard this, this, this, and this." "Well did you hear that?" "No, I didn't hear that." (Mary 07)

However, by far the most common strategy of consultation was to place some proposed initiatives in the public domain for validation or modification. "Are we on the right track and if we aren't what track should we be on?" (Ron 06) Usually, this is a data gathering exercise which attempts to assess the preponderant opinion on a complex initiative.

> The desired objective is . . . to get the public to say "Ya, we agree with this part, but we don't agree with that part." We'll revise, modify is the word we're using, the [program] . . . in sync with, I would assume the majority, the feelings of the majority that we talk to. (Ann 02)

This input was used in the further development of the initiative:

> It was obvious that if something came in saying this was off track, the next draft reflected something getting closer to the track. So they knew that their comments were being considered by the committee . . . (Ron 14)

In other cases, the consultation was directed toward ensuring that the interests of stakeholders were addressed:

> I sense one of the major things that the department was trying to do was to test with the various forms of public and industry, whether they had been successful in meeting most of each group's concerns or needs. . . . When we went out, we did not have a finished product. We had discussion papers or focus papers, and with that, all the groups could react and give ideas. "Change this or change that". We went out on that purpose. (Gord 02)

This view indicates that validation and modification takes place when the initiatives are still malleable. However, others were more resolute in their approaches:

> I suppose there is the kind of policy development where the department might have a position, and it might put it out there and say "What do you think?" . . . What happens is that you are inviting people to dislodge you from that position. That's one way of going about policy development, but you have to start somewhere so you do. And when that happens, we look at the responses and say, "Well, is this worthy of us being dislodged from our position?" (Peter 14)

Value-added Information

For other administrators, however, the strategy was to obtain what was frequently called "value-added" information, explained by one administrator as the following:

> I think in public policy making, you're trying to do what I call value-added. There seem to be a couple of models used by governments over the years. One is what I call the traditional model where you find out what Groups A thinks and you find out what Groups B thinks and you find out what Groups C thinks and you try to balance them off against each other. It doesn't work all that well. . . . A more appropriate and I think more contemporary approach is to say, "We've got A, B, and C. They each have vested interests. Let's see what we can build, that together can maximize their satisfaction, rather than minimize their dissatisfaction." And that to me is a far more constructive policy making model. And that's what I call value-added in your policy making. . . . Finding some way to add to what they want by combining some element. (Peter 15)

Adding value to the information, therefore, comes as a result of the interaction among the individuals involved in the consultation and the interests they represent:

> Ultimately, we are responsible for the final decision. So that means a responsibility to the extent that we ensure that the input we get is value-added input, and not just input to satisfy the whims of individuals. It has to be value-added information. (Glen 15)

In discussing the same theme, another administrator observed, "We had no interest in having . . . people come . . . and tell us what we already knew they were going to tell us anyway. . . . We wanted to force people out of their comfort zone." (Bruce 37) One of the least complex and more common forms of value-added information is to determine the priority assigned to an array of initiatives:

> They help us identify what's most important to [clients] and what should we work on first. . . . There are a lot of issues there. They help us narrow it down to what are the really important issues, what should we look at first. (Julie 04)

Some consultations were clearly focused upon this single strategy:

> Coming out of the first meeting my expectation was certainly to get the ranking of the issues and to get a sense of how they wanted the issues handled, and we got that. (Jan 08)

A second type of value-added strategy was to obtain a clarification of client positions, an objective which was sometimes difficult to achieve.

> I guess we wanted the [clients] to put into writing what they always say, "You've got to give us more autonomy and decision making. We're big boys now." . . . But they didn't. . . . It's a lot easier to say, "I don't like that line, change it to something." (Ron 05)

The following episode indicates one administrator's direct attempts to clarify the position of a group of clients.

> I said, "Look, I don't understand what the message is. Can I ask you guys one question? When I leave here, my minister is going to ask . . . what the message was. What is the message? What do you want me to tell my minister?" . . . I wanted to know what that group . . . what the message was. And in fact I think . . . I asked when one guy got up to speak, . . . I asked, "Is that what everybody wants? . . . Is that what you are all saying?" And the answer was "Yes", at least nobody said "No".

As this episode indicates, the capacity of the administrator to obtain reliable value-added information depends upon the way in which the consultation allows for the interaction among participants and the expression of contending interests.

Building or Maintaining Relationship

Many participants expressed the need to support or develop relationships among segments of the public in order to meet the requirements of the policy process. Thus, the consultation strategy provided an opportunity for collaboration, negotiation or partnerships with or among the competing interests.

> I thought that throughout this whole process that there . . . were some trends happening . . . and, in particular, one being that [clients] need to work together. . . . So as we put into the workshop process a little bias in that sense. . . . "How can [the participants] work together with the people that are around them at the table who happen be their neighbors?" (Art 17)

In some instances, there were more direct opportunities to negotiate solutions among contending interests:

> I would think that the process at that time would be very strong in trying to reconcile, making sure that we understand not what you say, but why you said it. "Is there something else? Is there a 'why' back there that's the same as my 'why'?" (Adam 27)

The process of consultation was also viewed as a vehicle through which partnerships can be formed among the client groups as "a longer term thing with a lot of parties often acting in partnership with each other on specific initiatives", (Julie 03) or between government and the client. "In order to get anything done in that area, we need to work in partnership with service deliverers." (Julie 03) This need for government and clients to work together was echoed in the description of a large scale consultation:

> It's one of the first joint undertakings by this government in coming up with a consultation process to reach out to stakeholders, for input and advice, . . . to get together with their stakeholders to determine a position and some subsequent actions. (Jim 02)

Those who sought to affect significantly the relationship with clients as a consultation strategy, consistently reported their desire to develop some ownership for the process. The outcomes among those involved:

> The hope is that if the process works, not only do you end up with a strategy that people accept, but also . . . people committed to implementing it, and that's what you want. We're long past time where government could do strategies. Quite frankly, while government is large and has got a lot of money, government-based strategy is not likely to be successful. Not nowadays. You basically have to harness all the horses and get them pulling in the same directions. (Bruce 34)

One administrator saw this as being accomplished by building networks among clients:

> We wanted the people who came . . . to work together, to talk about the common issues together, to make contacts and connections that they would not have otherwise made, to hopefully set something in motion that would have some sort of follow-up. . . . Something that they would follow-up. (Art 21)

Another saw the consultation as building identification with collective interests:

> There is, I think, for the first time in history a move towards a more united [client] community. In the past the . . . community has been extremely fragmented. It's been "My [organization], my program, my grant against everyone else." And now they're just beginning to realize that there is strength in numbers, in terms of advocacy, getting the [program] on the political agenda. . . . [There is a] benefit in cooperation. So I think they are interested in that point of view. (Lisa 12)

The development of new relationships also creates an opportunity to build support for new initiatives. This administrator used the consultation process designed for evaluation purposes to put into place an initiative which did not previously have broad support.

> Sure many programs were changed. Not many in the case of [program objectives], but there were substantial changes in program methodology. The [new initiative] is a big example. Support was built for this rather major initiative, and we were able to pull it off. Quite frankly, it might not have had total support if we unilaterally charged into the arena. . . . So we built support for that. (Bob 12)

Thus, the administrators in this study approached consultation with two different strategies. The first was the collection of information required by the policy process, and the second, the structuring of relationships with clients to facilitate the further progress of the policy process. These strategies were not mutually exclusive and most administrators were cognizant of how the relationship with the public and among those engaged in the consultation would impact the collection of policy information.

Summary

Each administrator in the study expressed some understanding of the stage of the policy process in which consultation was required. Administrators established public consultations for the purposes of issue identification, identifying policy alternatives, implementation, and evaluation. Typically, consultation was confined to that stage alone after which the policy process continued.

In designing the consultation, each administrator expressed a further understanding of the strategies that the consultation process would use to fulfill the requirements of the policy process. Consultations were conducted to provide information on public preferences or to structure relationships with the public which would facilitate the further progress of policy process. Administrators exhibited considerable independence in structuring the consultation strategies to meet the demands of the policy process.

The Formulation of Public Policy

There is an historical linearity to the study of policy analysis which seems rooted in Easton's simplistic and often quoted systems model of politics. Easton's system is an uncomplicated combination of environmental inputs and outputs, mediated by the black box of political decision making (Easton, 1965). It is the content of this black box which has been the focus of the study of public policy in terms of institutional structures, behaviour patterns of policy makers, or the content of policy (Dye, 1978, p. 5). Studies based upon the examination of the black box begin with an assumption of environmental inputs forming the basis of a policy problem, in Easton's terms, and made up of information on

public demands and support for the process of making policy decisions. The process concludes with the production of outputs in the form of public policies (Dye, p. 36).

Outside of the black box is a feedback loop in which the environment is altered by the policy outputs, thus resulting in modifications to the environmental inputs and creating the basis of a new policy problem. Viewed from within the black box, however, the policy process is linear, linking objectives to outcomes. It is also a rational process in which alternative approaches to satisfying society's aggregate value preferences are assessed objectively and an optimal policy solution is derived for implementation (Dror, 1968). Finally, it is a sequential process, with each component of the process completed before the next is undertaken.

This conception of a linear, rational and sequential policy process has given rise to the various conceptions of stages within that process. There has been considerable consistency among the various approaches to conceptualizing these stages. To bring some order to the development of social policy, Mayer and Greenwood (1980, p. 9) developed a model of the flow of stages in the policy making process composed of the determination of goals, needs assessment, specification of objectives, design of alternative courses of actions, estimation of consequences of alternative actions, selection of courses of action, implementation, evaluation and feedback. Dunn (1981, p. 48), in developing a model of policy analysis, links the information components of policy (policy problems, policy alternatives, policy actions, policy outcomes, and policy performance) with the analytical methods required to transform one to the other (problem structuring, forecasting, monitoring, evaluating, recommending). Dunn divides his model into two dimensions, policy formulation and policy evaluation along one axis, and prospective and retrospective policy analysis along the other. Nakamura and Smallwood (1980) take an equally comprehensive view by examining independently the policy processes operating within three functional environments, those of policy formulation, implementation and evaluation. Finally, Dror (as cited by Dye, p. 29) offers a decision system beginning with goals, values and resources, alternative policies, benefit/cost predictions for each alternative, net expectations, and selection based on a comparative analysis of alternatives with the greatest net expectation.

The authors of these policy stages would be the first to admit that they are idealizations of policy making, or as Nakamura (1987) puts it, a "textbook policy process". However, they reflect in these idealizations an orientation to the policy process which is based upon assumptions that, first, policy is a product; second, policy formulation is a top-down

process; third, policy is determined by environmental forces; fourth, policy formulation is rational, linear and sequential; and, fifth, policy is applied to passive clients. In that the policy process takes place within the context of a bureaucracy, these assumptions represent a very good fit with the nature of a bureaucratic administration. However, the role which the public might play in a policy process built upon these assumptions is less clear.

Policy as Product

The basic characteristics of a classical Weberian bureaucracy are a hierarchical structure, a clear division of labour according to professional expertise, and detailed rules and procedures (Morgan, 1986, p. 25). While organizations appear to take big actions for large reasons, as Allison (1969) points out, organizations are black boxes covering a myriad of individual decisions and behaviours. Policies are the consequences of innumerable and often conflicting actions of individuals who hold only partially compatible conceptions of the goals of the organization. The development of congruent policy requires that each of these independent actors be coordinated through a set of standard operating procedures (p. 354). Policy-making in a bureaucracy thus becomes controlled by rules and procedures, segmented into stages by task specialization with each stage assigned to those with the most appropriate expertise. Each stage is a segment of the black box, a unique decision making mechanism operating within an organizational environment composed of demands and supports, and producing policy outputs. Within the bureaucratic structure, policy making becomes a series of products passed through the organization, each bureaucratic unit executing its unique responsibilities in order that the next may fulfill theirs.

The two fundamental attributes of bureaucratic structures are "the irreducible discretion exercised by individual workers in their day-to-day decisions and the operating routines that they develop" (Elmore, 1978, p. 199). Individuals and organizational units generate autonomy in their actions through their discretion, and create operating routines both to simplify their activities and to isolate their specialized skill in controlling and managing their assigned tasks (Wilson 1989). Participation at some stage of the policy process is recorded as a concrete expression of that special competence, knowledge and organizational position represented in the administrator or administrative unit. These are the policy products that are passed from one policy stage to the other. However, as individuals and organizational units resist efforts to have their discretion altered or their operating routines changed by others within the organization (Elmore, p. 201), the process becomes one of incrementality. Therefore, the orientation of policy making in a bureaucratic structure

focuses increasingly upon internal considerations of satisfying the demands and earning the support of those within the organization. The interests of those external to the organization must be represented within those considerations if they are to be addressed at all.

Policy-making as a Top-Down Process

Wilson contends that "the job of administration is, purely and simply, controlling discretion" (Elmore, 1978, p. 201). Within a hierarchical bureaucracy, the process of policy making begins at the top of the organization and it is controlled throughout by the allocation of specific tasks to subordinate units and performance monitoring on the achievement of policy objectives. The tools of management are utilized to direct the use of discretion and to shape existing routines toward the purposes of policy. This top-down approach to policy-setting places senior management in the position of assessing, understanding, and responding to environmental requirements through organizational action.

However, as Elmore indicates (p. 202), most public service agencies are deliberately designed to prevent interaction between higher-level administrators and clients. From the client's point of view, policy is not so much formulated as it is embodied in the practice of public agencies in dealing with the client's needs. There is the potential for significant differences between the policy pronouncements of higher level administrators and the actual practices of delivery personnel. As such, discretion increases as one moves down the hierarchy making control increasingly difficult (p. 203). Thus, as Pressman and Wildavsky (1979) observe, "The process is the purpose" (p. 181).

> The central problem of [policy] implementation is not whether implementers conform to prescribed policy, but whether the implementation process results in consensus on goals, individual autonomy, and commitment to policy on the part of those who must carry it out. (Pressman & Wildavsky, p. 181)

Therefore, the job of senior administration is not so much one of controlling discretion. Rather, it becomes one of ensuring consistency between the objectives of policy and its implementation. Discretion is not controlled, but applied in a direction consistent with the goals of policy. As Pressman and Wildavsky observe, "We require the impossible when we expect our bureaucrats to be at the same time literal executors and successful implementers of policy" (p. 189). It is their suggestion that, in the absence of an omniscient policy maker,

> all we can do is carry along a cluster of potential policies. Implementation begins neither with words or deeds, but with multiple dispositions to act or to treat situations in certain ways. (p. 183)

Policy-making, then, is the development of a shared understanding among the policy participants of common dispositions to act toward a certain problem. Pressman and Wildavsky observe that the essential constituents of any policy are objectives and resources (p. 182). The policy process becomes one of developing consensus on the objectives of strategies chosen to satisfy demands, and support in the application of resources toward those strategies. Top-down control of a policy production process, based upon a rational assessment of environmental factors, becomes extraordinarily difficult

> because of the cognitive limitations and the dynamic quality of our environment, . . . there is no way for us to understand at first all the relevant constraints on resources. We can discover and then incorporate them into our plans only as the implementation process unfolds. (p. 183)

The implementation of policy is not controlled, therefore, but led by dispositions to act in a certain way, molded by the constraints of the organization, and guided by the values of those who participate in its implementation.

Policy as Determined by the Environment

Where the models of bureaucracy and policy stages diverge is on the question of the determinism of the environment. Policy stages models presume that as an issue arises in the environment of government, it is processed through the remaining stages and a policy emerges at the other end. The assumption continues in that, not only does the process start in the external environment, but the outcomes are also determined externally.

However, a perspective which has come to be referred to as "new institutionalism" (March & Olsen, 1984; Ostrom, 1986; Peters, 1992) emphasizes the relative autonomy of political institutions, contending that institutions are not just structures, but holders and propagators of social values. This perspective suggests that "actors in government often act as if they were at the mercy of external forces, whereas they can often determine their own agendas and essentially determine policy." (Peters, p. 162)

> Assumptions of the environmental determinism and linearity are inherent in policy process models. . . . Those assumptions tend to minimize the impact of political institutions, and of their "withinputs" in the policy making process, on final choices. These approaches therefore tend to give excessive cogency to explanations which depend upon factors arising outside of government itself, or to assumptions that the nature of the

> policies themselves will determine the nature of the politics surrounding them, as well as their final decision. (Peters, 1992, p. 161)

Wilson (1989, p. 24) also makes the case that the form of the organization is far more significant in policy making than environmental determinants. Thus, from the point of view of a public bureaucracy, policy making is an internal process subject to the constraints imposed by the organization rather than the demands of the environment (p. 115). As collections of standard operating procedures, they develop structures which define and defend interests, thus becoming political actors in their own right as policy experts within the institution develop and shape the understanding of policy issues and alternatives (March & Olsen, 1984, p. 738-39).

In laying the basis for the new institutionalist perspective, March and Olsen, among others (Krasner, 1978; Ostrom, 1986), contend that "without denying the importance of both the social context of politics and the motives of individual actors, the new institutionalism insists on a more autonomous role for political institutions." (p. 738) The policy stages models assume that the outcomes of the process are determined by three environmental political factors: the distribution of preferences among political actors (interests), the distribution of resources (powers), and the constraints imposed by the rules of the game (constitutions), each treated as exogenous to the policy system. For the new institutionalists, these political factors are viewed as largely endogenous to the institution. Interests or preferences are not accepted as external to the institution, but formed by it through social interaction (Wildavsky, 1987, p.5), the institution thus assuming a role as an educator, redefining meanings and stimulating commitments (March & Olsen, 1984, p. 739). The distribution of political resources is also partly determined endogenously with institutions affecting the distribution of resources and the power of political actors. Nor are the rules of the game imposed by some external social system, but to large degree developed within the context of the institution.

> The new institutionalist, in company with most research on preferences, argues that preferences and meanings develop in politics, as in the rest of life, through a combination of education, indoctrination, and experience. They are neither stable nor exogenous. If political preferences are molded through political experiences, or by political institutions, it is awkward to have a theory that presumes preferences are exogenous to the political process. And if preferences are not exogenous to the political process, it is awkward to picture the political system as strictly dependent on the society associated with it. (March & Olsen, p. 739)

Policy as a Rational Process

Adopting an institutionalist perspective does not require that the components of the policy stages model should be disregarded entirely. However, these stages can be conceptualized quite differently, stressing the importance of organizational values over rationality, and structure over process.

The prevailing understanding of both the policy stages and bureaucratic models assumes that policy making is rational, thus

> seen as a 'science', . . . a view which assumes that policy is informed by scientific research and written by 'objective' policy analysts; that it is the consequence of a series of rational decisions by neutral arbiters of pluralist interests. (Blackmore, 1992, p. 3)

However, the rational, scientific basis of social policy has been questioned often, with challengers hinting at the non-rational influence of value positions. Simon (1983) suggests that rationality is bounded by experience and situation and, consequently, decisions are largely based upon the recognition of familiar situations and affected by emotion. Etzioni (1987) proposes that policy decisions are more often made on impulse or out of habit. Therefore, to understand policy decisions, rationality must be considered in company with non-rational factors .

The linearity of the policy process must also be questioned. As Peters (1992, p. 165) indicates, it is clear that an issue must be placed on the agenda before any other action can be taken, but beyond that it is not certain that any particular order needs to be followed. Lindblom (1959) suggests that policy making is a process of "muddling through", and that in the absence of comprehensive knowledge, the process is largely incremental. March, Cohen and Olsen (1972) go further to suggest that organizations are organized anarchies, "garbage cans" in which problems, solutions and decision makers swirl around in search of each other. Reasoning processes also are not always rational. As Wildavsky (1987, p. 9) points out, "People can know what they believe . . . without knowing how the belief is derived".

As such, the scientific, rational basis of policy models is largely an artificial construct. Dye (1979, p. 9) accepts that the components of his highly structured policy system are linked in a dialectical relationship in which each influences and is, in turn, influenced by other components in a constant process of accommodation. Even Dunn (1981) acknowledges that as a result of "multiple stakeholders, uncertainty, consequences that change over time,

conflict and argument, it seems unlikely that policy alternatives can be totally rational" (p. 226).

One approach to the institutionalist perspective, while accepting the confusing array of cross-cutting forces at work within organizations, continues to provide for rational assessment of the situation and calculation of proposed action. Both Ostrom (1991) and Wilson (1989) explain policy making as rational responses to institutional restraints on choice, and suggest that individuals will act rationally within the constraints imposed upon them by layers of rules. However, March and Olsen tend to reject rational calculation and instrumentalism as guides to action, concentrating instead on the role of values as guides for policy choice, or on the logic of appropriateness. (Peters, 1992, p. 175).

> We assume that political actors associate certain actions with certain situations by rules of appropriateness. What is appropriate for a particular person in a particular situation is defined by the political and social system and transmitted through socialization. (March & Olsen, 1984, p. 741)

Therefore, understanding the policy process involves understanding how different organizations and their members conceptualize the social world for which they bear some decision-making responsibility and how the values of the organization direct that process.

> These choices are simultaneously choices of culture - shared values legitimating different patterns of social practices. . . . Shared values and social relationships go together. . . . They construct their culture in the process of decision making. (Wildavsky, 1987, p. 5)

Policy as Applied to Passive Clients

The picture of organizational culture which emerges from the stages models of policy formulation in a bureaucracy is one which not only grows from within the organization, but from an orientation toward internal organizational factors. Rational and objective administrators thus set themselves apart from those affected by the policy decision.

> In attempting to observe impartially the behavior of those affected by policies, planners adopt a hierarchical stance which reduces those who are the focus of planning to lower status. Consequently, no meaningful relationship is established with those who will be affected by the plans, and planning becomes manipulation. (Bosetti, Landry, & Miklos, 1989, p.3)

There is a distinction between the policy maker and the practitioner, and between the active role of those responsible for social policy and the passive and dependent role of the public. This role of the administrator is that of the expert producing a "strategic solution to an abstract social problem" (Blackmore, 1992, p. 17). Social policy is evaluated

independently against objective measures of social need, instead of subjectively by the people who are affected.

> This bureaucratized relationship makes the administrator rather than the citizen the expert in defining and prescribing human need. It passes over the control of policy to the bureaucrat who supposedly represents the interests of the citizenry. . . . In doing so, the very subject of politics, the citizen, is reconstructed. Now the citizen is to be serviced, not an active participant in the policy process. (Blackmore, p. 18)

In constructing a culture in which the external demands of the public and the internal demands of the organization are separate, the policy process runs the very real risk of irrelevance.

Policy in a Participatory Democracy

The basic assumptions upon which the traditions of policy analysis have been based reflect an understanding of the relationship between public agencies and the public which is in large part alien to effective participation in the process. While the stages models of policy formulation provide an excellent analytical construct and one which is consistent with the models of a bureaucratic hierarchy, the assumptions upon which those models are based reveal a number of contradictions in the nature of public organizations and their relationships with those whom they serve.

Policy making in a bureaucracy is an internal function, responsive to internal demands and serving the needs of internal requirements. The degree to which external demands are met depends on the degree to which those demands are represented in internal processes. Policy decisions are not so much driven by environmental determinants as they are reflective of organizational values, or the culture of appropriateness in which administrators learn through socialization the organizational culture of appropriate outcomes.

The process of making policy decisions is designed to be rational, yielding instrumental outcomes in the allocation of scarce resources in the face of conflicting interests. However, the structure of the process is hierarchical and segmented. The rationality of individuals working with each segment is bounded within the organizational context of that segment, each seeking to satisfy the demands and earn the support of others in the process through the exercise of their specialized expertise. Policy, therefore, is seen as a solution to a problem, and administrators are required to apply their technical skill to produce the best solution to the problem.

This view of policy as a top-down, rational, and technical product denies an alternative perspective of policy as a process in which, first, participation in the process may be valued in its own right, regardless of the outcome; second, policy formulation is a dialectical process in which policy itself is transformed in its implementation; and, third, it is the practice of the organization which might be more appropriately viewed as policy outcomes instead of policy pronouncements. The difference between these two perspectives lies in their different approaches to the nature of policy relevant knowledge (Dunn, 1981, p. 44). If analysis is to comprise those activities aimed at developing knowledge relevant to the formulation and implementation of policy, then understanding what comprises such knowledge is critical.

Models of policy formulation bear the unmistakable imprint of their heritage of logical positivism (Torgerson, 1986, p. 35). Within this legacy

> all real knowledge was scientific knowledge. . . . With this kind of knowledge, events could be explained in terms of antecedent conditions; and, conversely, future events could be reliably predicted. Clearly, such knowledge would allow for the control of future events and could thus be employed in the development of reliable social technology. (Torgerson, pp. 35-36)

This approach to policy-relevant knowledge is limited in two ways. First, it cannot provide any guidance in determining which goals this social technology should be employed to pursue. Second, it fails to understand the nature of the social context of policy. The more subtle effects of politics, h uman nature and institutional structures are essentially ignored.

> The users of policy-analytic techniques are under constant pressure to reduce the many dimensions of each problem to some common measure in terms of which "objective" comparison seems possible - even when this means squeezing out "soft" but crucial information merely because it seems difficult to quantify or otherwise render commensurable with the "hard" data in the problem. (Tribe, 1973, p. 627)

The alternative is to adopt a more interpretive stance in policy analysis. The neutrality of positivism grows from an image of the analyst as divorced from the object of analysis, a neutral observer. This might be viewed as deriving from the traditions of policy analysis models. It may also be an artifact of the administrative state. Therefore, if positivism has removed the analyst to a position of neutral observer of a detached world, then an interpretive orientation, or what Torgerson refers to as post-positivism, returns the analyst to the world as an active participant (Torgerson, p. 40).

> The analyst must develop not only a knowledge *of* society, but also a knowledge *in* society. Social life is conducted quite simply, on the basis of

> common sense - the generally shared meaning of words, gestures, and institutions which constitute a particular mode of cultural understanding. Anyone who seeks to study social life must posses such understanding; one must be "in on" the generally shared meaning of things. (p. 41, emphasis in original)

Policy analysis cannot be divorced from society. The appropriate model of policy formulation is not that of the detached observer, but of the participant observer. Public participation becomes an epistemological imperative.

> Just as positivism underlies the dominant technocratic tendency in policy analysis, so the post-positivist orientation now points to a participatory prospect. Here the methodological posture complements a particular commitment which has been voiced on the fringes of the policy literature: a commitment to promote a policy process which both permits and encourages greater citizen participation. (p. 43)

However, if technocratic analysis is an artifact of a hierarchical administrative bureaucracy, then to adopt a participatory focus will ultimately challenge the established structure of power relationships which underlie the policy process. The movement toward participatory policy formulation is not without cost. However,

> to get to the "truth," the analyst will have to rely not on models and algorithms, but on advocacy and adversary process. The supreme analytic achievement is no longer the computation of optimal strategies, but the design of procedural rule and social mechanisms for the assessment of incomplete and often contradictory evidence. (Majone, 1977, p. 175)

Chapter Summary and Findings

Over the past decade, the degree to which the administrator has been required to involve the public in the policy making process has increased substantially. Declining trust in public institutions and reduced self-confidence on the part of government have resulted in challenges to the traditional roles of administrators, legislators and the public. To a large degree it has been left to the administrator to determine how these roles are to be re-written in the rapidly evolving environment of public policy.

The administrators in this study employed public consultation throughout the policy making process, including the identification of issues, identification of alternative strategies, implementation, and evaluation. Typically, each administrator approached the process of public consultation as being confined to the stage of the policy process in which they were involved. Each stage of the process sets certain requirements for the consultation. In

response, consultation strategies were developed to meet these specific demands, with the products of the consultation then returned to the continuing policy process.

This approach to consultation reflects assumptions about the policy making process on the part of these administrators which are consistent with those of the traditional stages model of policy making, operating within an administrative bureaucracy. This view represents one of a segmented policy process, composed of a series of sequential stages. Each stage is linear, with a beginning and an end, initiated by inputs and concluding with outputs, in and out of an organizational environment. Information is the basis of this process, as it is information which forms the products which are handed from one stage of the process to the other. The process is rational as the new information received through the consultation is transformed into policy-relevant knowledge for use by others in the organization in formulating and implementing policy. It is also a process which is based upon the dominance of positivistic perceptions of what constitutes policy-relevant knowledge as the techniques employed in the collection, analysis and reporting of consultation outcomes are based upon the objectivity of policy analysts and their contributions to the formulation of policy.

As a result, the policy process becomes responsive to the internal demands of the organization rather than to the external environment within which it exists. Administrators in this study exercise considerable discretion in their approaches to structuring the consultation. This discretion is guided by the values of the organization and embodied in its organizational culture. Information from the public is interpreted within the value framework created within the organization. The degree to which the preferences of the public are incorporated into the policy process depends upon the extent to which they are translated into the internal demands of the organization. Thus, for many of the administrators in this study, the impact of their efforts in consultation is determined by the extent to which the knowledge gained is consistent with or can be transformed into knowledge that is useful within the organizational context. Therefore, policy making in an administrative bureaucracy is internal to the organization, responding to internal demands and the environment, culture, and values of the organization.

However, administrators in this study indicate that there are two reasons to consult the public. Consultation was employed most frequently to gather information on public preferences in order to validate or modify policy proposals generated within the organization to be used in the further development of the initiative. This sometimes resulted in difficulties in accepting the full extent of public input into the policy

deliberations and, on occasion, the consultative process had a greater role in the propagation of organizational values than in their transformation. However, consultation was also used to generate constructive relationships within the relevant community. Administrators using this approach endeavored to externalize the formulation of policy from the organization by transforming the policy process and the nature of policy-relevant knowledge through public involvement. However, to do so is to confront many fundamental characteristics of a contemporary administrative bureaucracy.

Consultation for the purposes of generating information serves the value system of the organization. Building relationships, on the other hand, requires the generation of shared values, something which does not occur during a single round of consultation. Relationship building requires continuing dialogue in which information is exchanged, common values are identified, and perspectives of all parties are modified to allow the pursuit of common goals. Consultation for the purposes of relationship building, therefore, requires a fundamental re-invention of the policy process and the culture of administrative organizations.

Consultation for the purposes of gathering information is in support of an internal policy process governed by organizational values. Consultation for the purposes of relationship building tends towards the externalization of the policy process and toward greater acceptance of the values and involvement of community members in that process. This transformation of the policy process requires fundamental changes in the assumptions which form its foundations. This approach first assumes that the public is not passive, but can effectively articulate views on issues that affect them. Second, it accepts the primacy of values over rational calculation in the formulation of policy. Third, it seeks to place organizational values into a societal context, molded by the external environment rather than attempting to construct an environment unique to the purposes of the organization. Fourth, it takes the view that policy is not a product passed through the organization, but an outcome embodied in the practices of the organization in dealing with its clients. Finally, the use of consultation for the purposes of relationship building relies far less on the top-down processes of constructing an organizational culture, but more on the development of a shared understanding of the environment, the demands of clients, and the values of the society in which the organization must operate.

As a result, it is not surprising that the administrators in this study far more frequently structured consultations for the purposes of information gathering than relationship building. Administrators exercise considerable discretion in their duties. However, this

discretion is circumscribed by the logic of appropriateness and their actions are guided by a set of institutional values which have been constructed by previous actions in similar situations. While the use of consultation has grown considerably over the past decade, models of policy processes which support the use of consultation for the development of relationships are not common. Administrators adopting such approaches are embarking on uncharted waters, often guided only by a sense of accountability to those who they feel have a legitimate role to play in the formulation of public policy.

Chapter 4

The Administrative Context of Accountability

Chapter Overview

The context of public consultation is the focus of this chapter. Consultation is conducted within the context of an administrative bureaucracy which both guides and constrains the activities of administrators. In discussing their activities in consultation, administrators participating in this study outlined a very clear sense of accountability to legislators, clients, or the administrative organization. These perceptions form the basis for this chapter followed by a discussion of four conceptions of administrative accountability found in the literature. The chapter is concluded with an interpretation of how these contextual characteristics are translated into the policy making framework.

Administrator's Understanding of Accountability

Central to the operation of any bureaucracy is the concept of accountability. In almost all the interviews, the subject of accountability emerged as a critical determinant of the approach to the consultation adopted by the administrator. Administrators participating in this study expressed a very clear sense of hierarchical accountability to legislators, to clients, or to administrative structures and their profession. However, each administrator had a very different sense of the ordering of this hierarchy.

Accountability to the Legislator

Five of the administrators in the study clearly indicated that they were primarily accountable to the legislators:

> I am accountable to my deputy and my minister, as my primary customer if you like. Ya, for sure. There are other financial matters that I am directly accountable to [the administration]. . . . Am I accountable to John Q. Public, whose child does not get into [the program] when they want to? No, I don't think so. (Peter 27)

The basis for this accountability is the doctrine of ministerial accountability which states that ministers are ultimately responsible for all activities within their jurisdiction and, thus, administrators are accountable to their ministers for their individual actions:

> The minister is accountable on the floor of the legislature, and the minister is ultimately accountable for the actions of his or her department. I think what the civil servants have to do is to ensure that that accountability is solid, and it's not putting the government in an untenable position. (Peter 26)

A second administrator also was primarily accountable to the legislator in order to provide the legislator with as complete a basis of information as possible to support decision making:

> I am accountable to the minister. I feel responsible to the people who participated in the consultation to reflect as accurately and responsibly as I can . . . what has been conveyed to us as information in response to all the public meetings. . . . I feel that once the input gets translated into a direction, that if people raise a question, say "Well, why would you . . . be proposing that direction, when all of this was said, and this seems different. I would feel responsible if someone asked me that question, to do my best to explain the difference." But I don't think one can start a system which makes government accountable to get back to each individual or meeting on what happened to A, B, or C. (Mary 05)

The basis of accountability to the legislator for this administrator was a belief that policy is formulated upon a broader range of information than that generated by public consultation:

> Because consultations and meetings are happening, that does not mean that government is in a position to do what it is that people say they want government to do. Decisions are made within a much broader context than input by a process. There are a whole lot of other pieces that have to be balanced in coming up with a decision. (Mary 08)

Thus, legislators require a broad base of information on the alternative policy choices available:

> Because what they like, and what they reasonably should like, is to have all the options before them so it can be discussed with their colleagues. . . . He's in a very difficult position. What he needs is information that he can weigh with his cabinet colleagues especially if it is a big thing. (Julie 25)

Therefore, administrators felt primarily accountable to the legislator for two reasons. First, the minister is ultimately accountable for all decisions and, therefore, administrators have a responsibility to ensure that those are good policy decisions. Second, these administrators felt that it was the obligation to provide legislators with as broad a basis of information as possible to support good policy decisions. Those policy decisions would not necessarily

be bound by the results of consultation as they would be made within a much broader context.

Accountability to the Client

Five other administrators in this study considered themselves primarily accountable to the client. The basic position of these administrators is that of public service. "[The public] have a legitimate stake in this because they own the resource that we are committed to manage." (Glen 02)

> The bottom line that we're working to in our branch is you're accountable to those people. Sure, we try to incorporate as much as what they told us as possible given the limitations, I mean, there are limitations you have to deal with in terms of funding certain programming. But you just can't say, "We don't like what you've told us. The rules have changed, not as much money is coming down. We're just going to toss it. Thanks for your consultation." I don't think that's going to work with them. (Jan 22)

This position was articulated most commonly as an obligation to act upon the directions of the public without deviation:

> But I do know and feel very very strongly that once you consult with people, if you don't listen to what they say, and if your actions afterwards, your strategies afterwards are not consistent in large part with what the people said, then you've got big troubles. (Adam 19)

For some, this is a conscious change in orientation to meet specific objectives:

> At least now we can say that we're approachable, that we consider the public to be our primary client, and that we'll listen to what you have to say. We may not be able to solve all of your problems, but we will do the best we can with the resources we have. . . . Public opinion still is in favor of supporting and trusting environmentalists, so government and industry are still at the lower echelon of the ladder. That means we still have a hell of a big job in front of us, which means more reaching out, provide more support and try to improve our credibility as much as we can. (Jim 21)

For others, this accountability has been thrust upon them because of the responsibilities of their program:

> When you give people responsibility and the authority to carry out the responsibility, what is often missing, and ought not to be, is accountability. That's where I'm in a Catch 22 situation, because while people are doing the . . . job, exercising the responsibility and authority, guess who gets all the accountability. . . . What happens . . . is the phone rings . . . and you explain that "That is not my responsibility" . . . and they say, "But just a goddamned minute, you are the Executive Director of [the program]

> aren't you?" and what do you do? "Yes, I am, sir. What is it I can do for you?" (Ed 12)

Thus, administrators felt primarily accountable to the client because of the belief that the public was the ultimate client. Therefore, to respond to the expressed needs of the public was to serve the public interest, and to ask for the direction of the public required that that direction be followed.

Accountability to the Organization or the Profession

The largest number of administrators in this study were primarily accountable to the organization or profession with which they were associated. This was most commonly expressed as questioning the value of public opinion over the professional opinion of fellow administrators:

> We are going out to the world and saying "We want to consult with you. We've got problems. Tell us what we should be doing." I think the question is too broad. . . . Presumably the taxpayers are paying you for the expertise, for the knowledge you bring to it, for your ability to make decisions, for the advice you can give. Are we now turning it around and saying to them "In spite, of all of this, I want you to tell me how I should be doing my job"? (Kent 21)

There was a consistency among these administrators as to the important role which administrators play in designing programs, a role which is devalued in the consultation process:

> Seems to me that we need to have a technical approach to this thing. Like how would you ideally, philosophically or theoretically structure the [program] if you were king? What sort of things would you like to see? What ideals would you like to achieve? What mechanisms would you like to put into place to do it? The final look of this thing, and its final impact on people. . . . Maybe someone within bureaucracy has to be able to go that far and accomplish that before it gets tested in the waters and shot down. . . . There was no one to fight for the ideal, and I don't know who you find in the system to do that. (Greg 17)

Others were doubtful that consultation was an appropriate method of resolving policy problems:

> Sometimes a lot depends on you sitting by yourself for a couple of hours or with someone else working through the major issues quietly and then coming back and saying "Here's an outline of what I thought, how I feel about these, and how we should proceed." And very often, if you've got that type of schematic laid out, decision making can be fairly easy. When you throw people cold into a room, . . . this is one of the problems . . . about taking a group of people and throwing them into a workshop from

> disparate areas. . . . They don't have the knowledge base to go on, to base their observations on. . . . Sometimes you get interesting creative views on things, but they are not necessarily great at problem solving. (Kent 11)

Still others thought that public consultation was unnecessary and possibly impeded efficient administration:

> And there are plenty of decisions that we are going to have to continue to make as a department without public involvement because there are certain degrees of decisions, operational level issues that will only strangle hold the department if we go out the public on every issue. In fact, it's a concern that a number of people have raised in our staff survey. . . . "In order to do my job properly, there are certain things that I don't think I need to poll the public on. As a public servant, I am given a certain responsibility to make certain decisions and I feel that I should be able to make those decisions in a professional way without having to consult with the public." So there are certain degrees of decision that don't necessarily fall within the category of those that will be better quality by involving the public. (Glen 20)

From a slightly different perspective, one administrator felt that the opinions of staff warranted special consideration:

> I try to give [the staff submissions] as much profile as I can, because of the public [read 'staff'] relations factor involved in this. I'd take them out, I'd pull the submissions out and let them [the consulting agency] know that "This is what your staff has to say. They've had enough courage to send it in and sign their name to it. OK, you had better beware of what they are saying." Maybe they are biased, and maybe they know industry and there are some points in here. (Gord 28)

Thus, primary accountability to the profession or to the administration resulted in an allegiance to the professional values and expertise represented by the administration and the decision making institutions which exist in the policy making process. Consultation with the public on policy issues was a challenge to their professional capability and that of their colleagues.

The Accountability Squeeze

As common as the theme of accountability was the associated theme of vulnerability. Administrators were aware that their association with the consultation created the possibility of strained relationships with legislators, clients or other administrators, and that this could have a variety of adverse effects.

For some, this vulnerability is closely linked to their sense of accountability to the legislator:

> So I think that what you do is to put in place processes that don't create surprises for your minister. I guess it happens, but I would sure hate to be around when it does, when you recommend a policy to your minister and if your minister should happen to say, . . . "Well how are people going to react to this," and I can't imagine a minister not doing that, . . . and all hell broke loose, I know who the minister would look at. (Peter 27)

However, for another administrator, keeping the minister informed was sometimes difficult:

> The problem with consultation is that unfortunately, in the political environment that we work in, the messenger tends to be the guy that gets shot. It takes a little bit of courage to say things that you know that the people don't want to hear, or that they are in the opposite mind set. And also it comes out as criticism of their work. But you're a professional public servant, you're paid to do your job. (Gord 27)

As this might indicate, one's vulnerability is not necessarily directly linked to one's accountability. Rather, it is a recognition of the ramifications for the administrator of taking actions in support of those to whom one feels most accountable which may have negative consequences for another group. In the following excerpt, this administrator outlines in some detail the possible risks and difficulties arising from consulting on policy issues:

> I think the most difficult area is consulting on policy . . . especially if it is through a very open kind of consultation process where you are looking at options, and want to get public feedback. Because that's the area where you have the potential for the most difficulty with the policy makers and the politicians. If you have a bureaucrat who, for example, says something about an option and it gets in the paper, . . . I think all you can do is to get politicians to recognize that you're going to raise controversy when you go out and consult around new policy or about changing programs.
>
> I mean you are changing programs, you are changing the status quo that the people are used to living with and no matter how you do it you are going to have someone who is ticked off. And in the consultation process, you are going to have people ticked off, because there are people who don't want change, or there are people who want certain particular changes that maybe they don't think that you're adequately supportive. And that's the hardest part for bureaucrats.
>
> And you'll also find when you're out doing consultation on policy, that the parties who have a really particular point of view that they want represented, that they'll go around you and go to the politicians. They get a sense that you are not favoring their option enough, that maybe you are too neutral. They will go to the Premier. That's the risk around policy, they'll circumvent the process. And that's the hardest thing for a bureaucrat, because then you end up responding to the premier or the minister about

> "Why the hell are you doing this?", or "This group have been in and they are all upset about the public meeting they went to. You seem to be saying this or that", whether you are or not. And you are answering to them and trying to do a fair public consultation process at the same time. But there is a real risk on the policy stuff for the politicians. It's a risk when it's an open process. (Julie 23)

As this passage indicated, the most common source of vulnerability for administrators in this study was public reaction to the process of consultation or to the policy outcomes. Typically, administrators have "a dual role, to be a messenger of government and . . . to be an advocate of the [client]".(Peter 02)

> And somewhere in there is the bureaucrat who is caught in the middle. That's the carrier of the public policy, the deliverer of the public policy, and has very little input at times in changing the public policy. (Art 06)

From this person's point of view, the administrator's role is that of communicator. However, the perception of the public is that of someone more influential:

> Myself, my staff, and the individuals who were selected to the [consulting agency], were on the front line with the public all the time. I was the department contact for other departments, the public, for other provinces, on the whole public process, on that whole issue. And in that sense . . . I guess the perception is that we have some control over what's happening when we don't. And that's an uneasy position to be in, quite unnerving at times. (Art 09)

As another participant indicated, "you become viewed . . . as a go between, you're kind of the linchpin. And without that linchpin, nothing works." (Ed 13) However, this person also acknowledged that even this role is not easy:

> I find myself in a two hat situation. It's a Catch 22 situation. I have to, not just be seen, but I have to be loyal to the employer that pays me, . . . so loyalty and support must be there. At the same time I must represent the interests of industry. . . . That's not an easy job. (Ed 13)

This dual role is currently even more difficult to fulfill because:

> People are beginning to look at bureaucrats . . . more like politicians. I am hearing people say out there, . . . "We don't trust the goddamned politicians, nor do we trust the bureaucrats" (Ed 03) The message is that they've been screwed by the politicians and guess who is advising them? The bureaucrats. (Ed 04)

Consequently, the administrator's relationship with the public becomes "awkward at times":

> Because the people that you are meeting with, particularly the members of the public, want to talk policy and civil servants usually aren't comfortable and sometimes aren't even allowed to talk policy. So you end up being the whipping boy, the messenger. You're rather emasculated. Often all you are able to do is to say, "I hear what you are saying and I'll make sure to pass that on to the minister", which doesn't satisfy a hell of lot of people. It does put you in a very awkward position. (Peter 22)

However, many administrators recognized that this was a part of the role which had to be accepted. As one observed, "If that makes them uncomfortable, they should find another job. That's part of the job. It's a fact of public service. I don't see that ever changing." (Bob 19)

A third source of vulnerability is from the administration itself. For this administrator, the vulnerability was very personal:

> [Consultation] creates difficulties within the department. It was difficult to overcome the view that I was separated from the department, that I worked specifically for the minister, on something that was his project and not related to any department or any other departments. . . . So in many ways I was isolated and very vulnerable. I felt vulnerable, . . . a lack of belonging. (Art 12)

For others, it created conflict within the organization:

> In my job, I found I was going against the management, because my job was to speak what was being said - period. "You may not like what I have to say, but that's what I'm going to say. This is not me speaking. I'm speaking for all these groups and different interests." (Gord 26)

In another case, the consultation identified a new initiative which created a wider conflict within the organization:

> There may have been a negative impact in our relationship with [another] division because of the [new initiative], although I tried to maintain a neutral position and just be a resource to the committee. In fact, some senior people were strongly in favor of the [new initiative] and some weren't. And it's had a result of some hard feelings between people in the . . . division and also in the . . . community. The rural guys don't want to lose their positions . . . and thought there was some kind of plot to get all the people in Edmonton into senior positions. . . . So there is probably some kind of rift in the . . . community over this that will take a while to heal, because some people were not very temperate in the way they were expressing their views. (Ron 15)

Another administrator saw the conflict as based on the different orientations of the professionals and those more sensitive to political pressures:

> I think the bureaucrats can do it if they can stand the heat, but I think that there is a feeling in bureaucracy against being creative. . . . Your performance appraisal, your promotion, these are important considerations. And also the bureaucracy is politicized at the top so that the bureaucrats at the top are to protect the minister and reflect the interests of the politicians. . . . Bureaucracy isn't a technical function at the top, it is a very political function. So to say "to hell with the politics of it, we should really have an innovative system that would serve Alberta better if we did this" . . . I think would raise the ire of those political groups and there would be a backlash and politicians would feel embarrassed in the legislature. (Greg 16)

Considerable concern was expressed by one administrator over a report that fellow employees had been required to appear before a quasi-legal public hearing. This would necessitate those testifying to choose between the values of the administration in implementing government policy and those of the professional society:

> They would be challenged to uphold the principles of their code of ethics that they have in the [professional society], . . . to be truthful and honest on these kinds of things which for some people is different from upholding government policy or the minister's or Cabinet's policy. And [the intervenors] thought they would get them up there and crack them open. So that's obviously a bad situation because they are in a large government organization and they are a person in the organization and having the exactly same values and belief system and science and everything the policy of the day has, puts them in a real bad spot. He is either siding with the ethics of his profession or the ethics of his employer. We all sign these oaths when we came on that we wouldn't do anything that would make the minister look bad. (Glen 09)

Summary

In undertaking the consultation, administrators become vulnerable to the possibility that the process may create unpleasant relationships with the legislators, the public or within the administration. Administrators are often ascribed greater power to affect the outcome of the consultation than those people may actually have. They may also be engaged in other relationships which may affect their ability to act. As a result they are placed in a squeeze between contending accountabilities, between the legislator and the public, the legislator and the administration, the public and the administration, or possibly all three. Clearly this squeeze has implications for the strategies the administrator will choose to cope with this uncomfortable position.

Public Administration and Public Accountability

There is a fundamental relationship between the governors and the governed in a democratic state. While the nature of this relationship has been the focus of timeless philosophical debate, essentially it rests upon the proposition that the legitimacy of a democratic government is based upon the consent of the governed. Thus, the public grants to government some responsibility to impose regulatory authority over facets of their lives but, in exchange, those who exercise such authority must be accountable to the public for their actions.

This is a gross oversimplification of one of the most complex relationships in contemporary society, but, at the very least, it places into perspective the balance of rights and obligations which exist between the governors and the governed. However, into the middle of this complex relationship, we inject the administrative bureaucracy, theoretically acquiring its legitimacy through technical expertise, neutral competence and procedural regularity. The purpose of the administration is to serve in the instrumental capacity of developing and implementing public policy. But, as indicated in the preceding section, the administration is not passive. The bureaucracy becomes a political actor in its own right, and the complexity of contemporary government requires that administrators exercise considerable discretion in executing their responsibilities. Therefore, they, too, must be accountable.

In the Westminster system of government, upon which the governments of Alberta and others in Canada are modeled, public administrators are accountable to their ministers for the implementation of government policies. Subsequently, individual ministers and cabinet collectively are then accountable to the legislature and, through it, to the public (Kernaghan & Langford, 1990, p. 161). However, there are others to whom the administrator may have an obligation of accountability.

> It is easy to compile a long list of the individuals, groups, organizations, institutions, and standards to which public servants are routinely advised to be accountable. Some writers on accountability focus on entities to which public servants are directly accountable, that is, political and administrative superiors; others add entities to which public servants are only indirectly accountable, for example, legislators, the public, and client groups; still others talk about the accountability of public servants to professional standards, conscience, and the public interest (Kernaghan & Langford, p. 163).

Thus, the doctrine of ministerial accountability imposes a relatively simple solution on a relatively complex problem. It suggests that administrators are accountable neither to the

public nor within their administrative or professional organization. However, as Kernaghan and Langford clearly illustrate, public administrators cannot discount their obligations so easily.

> Public servants have a duty not only to identify the widest public interest in the exercise of discretionary power, but also to exercise that power in a manner which reflects their responsibility to the affected individuals as citizens and fellow human beings (Kernaghan & Langford, p. 116).

Thus, within a democratic government, the function of the administrator is not simply to recommend policy choices and then to implement them. The function of the administrator is to enable a system of democratic governance in which public values are articulated through public discussion (Reich, 1988, p. 125). However, this, too, is an oversimplification. The scale and complexity of modern government creates an administrative environment in which decisions must be made quickly on a wide range of sophisticated issues. The participation of the public is precluded.

> For the typical public manager who heads a bureaucracy charged with implementing the law, public debate is not something to be invited. It is difficult enough to divine what the legislature had in mind when it enacted the law, how the [political leader] wants it to be interpreted and administered, and what course is consistent with sound public policy. It is harder still to commandeer the resources necessary to implement the program, to overcome bureaucratic inertia and institutional rigidity, and to ensure that a system for producing the desired result is actually in place and working. In the midst of these challenges, public controversy is not particularly welcome. The tacit operating rule holds that the best public is a quiescent one, the manager should work quietly, get the job done without disturbing the peace, and reassure everyone "out there", that there is no reason to be concerned or involved (Reich, p. 124).

Nonetheless, even as neutral analysts of optimal public policies, there remains a requirement for administrators to engage the public, if only to identify where the public interest might lie. To do so requires a conception of what constitutes the public and how the interests of the public are to be articulated. Administrators implicitly operate on the basis of these personally held conceptions of the public. However, they are not often made explicit which in itself creates the basis for very different responses to the participation of the public in policy making.

> Usually, a perspective on the public is *assumed* and it is further assumed that there is agreement on that perspective. When there is explication it is often discovered that there is disagreement as to whether *that* perspective is a fair representation of the public (Frederickson, 1991,p. 396, emphasis in original).

However, rather than a single consistent understanding of who constitutes the public, there are many. Generally in the literature, four broad conceptions of the public emerge: the public as interest groups, the public as consumers, the public as clients, and the public as constituents.

The Public as Interest Groups: Pluralism

The most well developed and widely accepted of these broad conceptions of the public is that of pluralism which describes the public as collections of interest groups that are made up of individuals with similar concerns, interacting and competing with other interest groups for policies or actions which satisfy the preferences of their members (Frederickson, 1991, p. 396). The role of the administrator in this conception is that of an intermediary who seeks a position which accommodates to the extent possible the varying demands of competing groups (Reich, 1988, p. 129). This becomes the public interest, the amalgamation and reconciliation of these contending claims and the net result of the interaction of competing groups.

There is a special affinity between pluralism and public administration. Frederickson observes: "Specialization is a key tenet of public administration, and government agencies are designed around specialties. Effective interest groups will find allies in particular specialized agencies" (p. 397). Pross (1986) has built upon this affinity to propose the concept of the "policy community" composed of a variety of interest groups which participate directly in the formulation of public policy.

> Political society permits special publics to dominate decision-making in fields of policy where they have competence, interfering only when larger concerns must take precedence, when systemic or technological change necessitates intervention, or when conflict within the special public spills over into the larger political arena (Pross, p. 97).

These "special publics" are "policy communities" which, by virtue of their functional responsibilities, vested interests, and specialized knowledge form "a dominant voice in determining government decisions in a specific field of public activity" (Pross, 1986, p. 98). Pross subdivides these policy communities into two parts in which he identifies first, a "sub-government", or a constellation of the lead government agency dealing with a particular policy issue, as well as other government agencies and societal interests such as business, professional and stakeholder associations that have direct roles in formulating and implementing the policy. Also attempting to influence the policy is what Pross refers to as the "attentive public" or the remaining members of the community who possess the

expertise and commitment to affect policy such as interested citizens, journalists, and public and private pressure groups (Lindquist, 1992, p. 131). Thus, while members of the sub-government actually make policy, the attentive public attempts to influence it (Coleman, 1987, p. 614).

The penetration of interest groups so deeply into the policy process creates contradictory stresses on administrators. On the one hand, policy communities reflect the interdependence of governmental and private expertise on issues of public policy which are increasingly fragmented and diffused (Lindquist, 1992, p. 131). Writers such as Atkinson and Coleman (1989) and Thorburn (1985) have illustrated the structural relationships between interest groups, primarily those representing business interests, and government in terms of the inequality of access to decision making processes and the instrumental resolution of power relationships. Sabatier (1987) and Lindquist (1992) take a somewhat different approach in describing how policy communities create a coherence in belief system and value structures in which the core of government policy remains relatively stable. Together, these approaches describe a comfortable consensus between administrators and the public as defined by interest groups, in which the boundaries of acceptable process and the value framework for policy discussion are understood.

On the other hand, Frederickson (1991), citing the work of Yates (1982), outlines how the influence of interest groups is fundamentally inimical to the efficient operation of effective public administration (p. 397). Yates contends that administrators tend to favour the centralization of power, while pluralists seek power structures which are more dispersed. Administrators require power to be in the hands of elected legislators and the senior executive, but for pluralists power should be in the hands of citizens as represented by interest groups. Finally, pluralists favour political bargaining and accommodation while administrators prefer to keep politics out of policy making. Frederickson challenges the degree to which these dichotomies exist as suggested by Yates. Nonetheless, however, they indicate that the relationship between interest groups and administrators need not necessarily be one of natural affinity.

Is the conception of the public as interest groups an accurate perspective? Interest groups often provide useful technical expertise and political support to the formulation of public policy in their area of concern (Rainey, 1991, p. 57). Thus, the most effective support comes from well organized and cohesive interest groups which are strongly committed to the work of the public agency. However, the preferences, attitudes, and needs of many citizens are not adequately expressed through interest groups (Frederickson, 1991,

p. 398). Agencies can also be accused of being captured by well organized interests to the exclusion of other relevant interests, thus damaging the credibility of the agency and its policies (Rainey, 1991, p. 56). Therefore, the inclusiveness of the policy community and the dynamics through which policy issues are resolved are important factors in the degree to which pluralist conception portrays to the administrator an accurate image of the public and the public interest.

The Public as Consumers: Public Choice

Interest groups project both a measure of the extent of public support for a certain position in the number of individuals represented by the group and in the intensity of that support demonstrated by their concerted action to realize those interests. The pluralist conception suggests that in the resolution of contending pressures, there is an automatic registering of the public interest as being the greatest good for the greatest number (Kelman, 1988, p. 48). The difficulty with this assertion is in ascertaining accurately the relative measures of support and intensity. In response, economic perspectives of the public have emerged based upon theories of microeconomics as applied to social behaviour. The public choice perspective assumes that the public interest is represented in the aggregation of individual choices and that the principles of economics govern the selection of possible alternatives in a social marketplace.

> Its core principles can be summarized as follows: people are essential self-interested rather that altruistic and behave much the same way whether they are choo ing a new washing machine or voting on a new board of education. These personal preferences are not significantly affected by politics, social norms, or previous policy decisions. The public good, or "public interest," is thus best understood as the sum of these individual preferences. Society is improved whenever some people's preferences can be satisfied without making other people worse off. Most of the time, private market exchanges suffice for improving society in this way; public policies are appropriate only when - and to the extent that - they can make such improvements more efficiently than the market can. Thus the central responsibility of public officials, administrators, and policy analysts is to determine whether public intervention is warranted and, if so, to choose the policy that leads to the greatest improvements. (Reich, 1988, p. 2)

The transfer of economic theories to social processes was proposed by Downs (1957) who developed a theory of democratic government in which the only motivation for elected representatives, political parties, bureaucrats and voters was self-interest and in which actions were determined by economic principles.

> Every agent in the model - whether an individual, a party or a private coalition - behaves rationally at all times; that is, it proceeds toward its goals

> with a minimal use of scarce resources and undertakes only those actions for which marginal return exceeds marginal cost. (Downs, p. 137)

Buchanan and Tullock (1962) extended the analysis by suggesting that government, rather than mediating contending interest groups, pursues its own independent interests. As with other microeconomic theories, these interests are defined as the sum of the self-interested actions of individuals, in this case those of legislators or bureaucrats. The picture painted by these writers is of a government driven by the aggressive pursuit of individual benefit regulated only by the essential premise of economics, that in the rational pursuit of informed self-interest, socially beneficial actions ultimately result in the aggregate.

Deriving from these perspectives is the field of welfare economics which is based upon the following premises:

> individuals are the best judges of their own welfare, social welfare consists of the sum total of individual welfares, people try to maximize their preferences, individual preferences are best revealed in competitive markets, and exchanges in such markets will yield optimum results. (Orren, 1988, p. 18)

Welfare economics has become a dominant force in a number of public policy fields. Schelling (1981) clearly illustrates that "most people are better at spending their own money than somebody else is at spending it for them" (p. 60). Fuchs (1983) demonstrates that the use of economic choice provides a powerful basis for making the difficult decisions facing society surrounding the allocation of scarce resources to conflicting goals. This same philosophy underlies the movement toward choice in education which has permeated much of the current thinking surrounding the reform of both the basic and post-secondary education systems of the United Kingdom, the United States, and Canada (Bottery, 1992).

The popularity of public choice perspectives is explained with clarity and precision by Lane (1986) who shows that there is a substantial difference in the perception of justice as dispensed by the market and that delivered by political institutions.

> It seems that the public tends to believe that the market system is a more fair agent than the political system. People tend to include the problem cases in the political domain and exclude them from the market. They ignore many of the public benefits and, with certain exceptions, prefer market goods to political goods. They prefer the market's criteria of equality and need, and believe that market procedures are more fair than political procedures. They are satisfied that they receive what they deserve in the market, but much less satisfied with what they receive in the polity. By a different measure, they are much more satisfied with the general income distribution among occupations than with the distribution of influence among social groups in the polity. (Lane, p. 387)

Given this preference for the invisible hand of the market, perspective of the public as consumer provides for only a limited role for the administrator in a functioning market system. Public choice theory

> envisages a society returning to a belief in the absolute liberty of the individual, located in a market-place unconstrained by the deadening hand of bureaucracy. . . . It unleashes large measures of individual freedom, initiative, motivation and personal responsibility. From economic freedom, then, stems personal and political freedom, a move away from interventionist government towards genuine political and economic liberalism. (Bottery, 1992, p. 78)

Within such a system, the existence of bureaucracy is, in itself, a distortion because bureaucracy and individual administrators act in their own interests rather than in the interests of those that they are mandated to pursue. The limited role offered to government is to intervene to remediate the impact of market failures arising due to inadequate competition in markets (e.g., monopoly), unequal access to information among consumers, or impediments to market entry or mobility (Orren, 1988, p. 19). Wolf (1987) suggests, however, that despite the consequences of a market failure, the results of government intervention may still be worse than those of a malfunctioning market. Another perspective contends that markets are incapable of addressing questions of social values and that governments are required to provide direction on ethical issues (Wolf, p. 46-47). Schelling (1981) responds that markets clearly articulate the shared values of the community and even provide a preferable basis for the reconciliation of the contending demands of the values of freedom and equity. The majority of public choice proponents, however, would return to their economic roots and simply accept that basing social action on maximizing individual preferences preempts any influence of broadly held social values.

Thus, the role of the administrator is narrow and of questionable legitimacy. In conceiving of the public as consumer, the determination of the public interest is left to the invisible hand of the market, the silent aggregation of individual self-interest into an unmediated collective expression of the public will. Government is restricted, possibly prohibited, from direct interference in the market as it seeks only its own interests. The role of the administrator is minimal. From the public choice perspective, society is governed automatically, left to the ebb and flow of individual preferences.

The Public as Clients: Professionalism

The use of the market has permeated much of western social organization and appears on the verge of becoming a staple of other social systems in transition. That is not to say that

it should be the model applied to all decisions of public significance. Self-interest clearly motivates many of our decisions and, in the aggregate, yields a highly responsive tool for determining what people want for themselves and how much they want it as opposed to other possible alternatives.

However, we also live within communities. We recognize that there are issues which are of greater significance than the sum of our individual self-interests. We choose for ourselves forms of government in which these wider issues can be addressed, intervening when our collective preferences can be satisfied better by consolidated action than by individual efforts. In a world of advanced technology, it is no longer difficult to tally individual preferences to discover what the majority of people want, and how much they want it. It is a greater challenge to engage the public in rethinking those preferences. For Reich (1988), formulating ideas about what is good for society is the real challenge of public policy makers.

> The core responsibility of those who deal in public policy - elected officials, administrators, policy analysts - is not simply to discover as objectively as possible what people want for themselves and then to determine and implement the best means of satisfying these wants. It is also to provide the public with alternative visions of what is desirable and possible, to stimulate deliberation about them provoke a reexamination of premises and values, and thus to broaden the range of potential responses and deepen society's understanding of itself. (Reich, p. 4)

To engage in such a debate requires specialized skills, commitment, expertise, and an understanding of the issue area which is greater than that which exists in the broader public. This is the domain of professionals. These are the practitioners of a given discipline who are granted significant control over their actions and the actions of others because they are masters of a knowledge base which is sufficiently esoteric that other forms of social control, consumer sovereignty and democracy are inefficient (Strike, 1992, p. 1).

It is the ceding of social authority which creates the essence of this conception of the public, the professional-client relationship. Most citizens do not encounter government or make demands on its resources through any channel other than through administrators. Clients are the public to the vast majority of public employees, who seek to serve the individual needs of clients through the application of their specialized knowledge in a technical, institutional or policy discipline. The public as client differs from the previous concept of the public as consumer in that the client is to some degree captured, and in many cases the client is a non-voluntary one (Lipsky, 1976, p. 97). A client is one who has a legitimate expectation that they are to be consulted, whose opinion should be considered in

decision making, and who may have some rights to informed consent. However, a client is also someone who is not a full participant in the decision. The professional-client relationship is thus one of unequal status and power (Strike, 1992, p. 6).

As the administration of public services becomes increasingly complex and dependent on sophisticated technology, clients of public services are far more reliant on the services of experts in fields that are beyond their comprehension. This reliance upon expert knowledge, then, results in a transfer of autonomy from the individual to the professional. A continuum emerges in the relationship of the professional to their clients which extends from one of indifference, in which the professional views the policy area as one of such sophistication that the public can have no valid input, to one of public trust, in which the professional is guided by an altruistic personal commitment to serve the public interest.

The first is one which arises from a sense that "the general public is . . . ill informed and ill equipped to deal with the problems to which they, the experts, have devoted their lives" (Yankelovich, 1991, p. 4). From this perspective derives a view that the complexities of modern government require an advanced understanding of the issues upon which to base their resolution.

> A government is responsive to the extent that it detects and responds to problems and needs, whether or not those problems and needs are perceived by citizens. . . . This model . . . is one favoured by professionals . . . who argue that because of their expertise, they alone are able to perceive the . . . needs of the community. Some go so far as to reject lay claims when they do appear. (Tucker & Zeigler, 1980, pp. 5-6)

This perception is advanced because of the public's inability to articulate preferences clearly and to communicate them in a meaningful way, and the administrator's inability to show clear connections between public preferences and the policy responses of the administrator (Tucker & Zeigler, pp. 230-232). For the professional, the only consistent framework is that of professional values, and to defer to public opinion is to sacrifice those values. Therefore, as Wirt and Christovich (1989) found, professional administrators continue to advance their own policy judgments regardless of public pressure and with no loss of influence over the policy outcomes (p. 11).

This position appears to reflect an absence of public accountability which would likely result in a withdrawal of the grant of autonomy so necessary to the activities of the professional in a democratic society. However, the ability of professionals to continue to act with independence derives from the belief that they can respond effectively to public demand by maintaining a congruence with public attitudes (Tucker & Zeigler, p. 5) or

within the "zone of tolerance" of public expectations (Wirt & Christovich 1989, p. 8). Thus, assuming that the public holds general attitudes and expectations which are not explicitly communicated, professionals may act autonomously so long as their actions generally reflect those attitudes and expectations. The acceptance of the client-professional relationship, therefore, is based upon broadly shared value structures.

The opposing end of the continuum places professionals in a position of public trust and calls upon them to pursue the public interest actively and to act altruistically toward achieving good public policy. It demands that professionals not simply seek what would be best for themselves, but act in such a way that all people are taken into account (Kelman, 1987, p. 210). Thus, professionals are asked to act in support of the community as a whole and to pursue the interests that they may hold in common as opposed to the particular interests which individuals or groups might pursue (Ranson & Stewart, 1989, 6). This does not preclude advocacy on the part of individuals. There is no simple formula for good public policy, and professionals must engage in passionate debate over alternative positions to challenge existing values and support learning and the advancement of public ideas (Kelman, p. 209). However, this public-spirited approach to professionalism does commit professionals to seek solutions which benefit individual interests while also pursuing collective interests, instead of at their expense (Ranson & Stewart, p.7).

Along this continuum between professional indifference and public trust are the professional administrators and service providers who are continually engaged in reconciling these positions. These are the people that Lipsky (1980) refers to as "street-level bureaucrats" or front-line service providers who become the primary instruments of contact between government and the public and who, through their decisions, actions, routines, and coping mechanisms, effectively make public policy (Lipsky, p. xii). Street-level bureaucrats are continually faced with the challenge of balancing the generalized application of professional values while simultaneously seeking innovative remedies for the individual needs of their clients.

> To deliver street-level policy through bureaucracy is to embrace a contradiction. On the one hand, service is delivered by people, to people, invoking a model of human interaction, caring, and responsibility. On the other hand, service is delivered through a bureaucracy, invoking a model of detachment and equal treatment under conditions of resource limitations and constraint, making care and responsibility conditional. (Lipsky, p. 71)

Administrators are then torn between advocacy for, and alienation from, their clients. Because clients are fragmented, disconnected and inchoate, they are often powerless to

effect change, thus requiring advocacy on the part of administrator (Lipsky, p. 72). Professionals through their training are expected to secure for their clients, the best treatment or position possible within the constraints of the professional relationship. This altruistic approach is incompatible with the indifferent perspective of professionals operating in a bureaucratic organization. Professionals pursuing greater autonomy for clients in meeting their own needs are met with an organizational need for greater standardization and control. Professionals seek greater resources to meet client needs while the organization attempts to minimize overall resources utilization. Professionals endeavour to deal with individuals in a holistic manner but the organization breaks professional tasks and client services into segments (Lipsky, p. 73). Under these conditions, advocacy on the part of professionals is difficult. Despite efforts to exercise the discretion available to professionals, the bureaucratic context ultimately dictates that rules and procedures will control the activities of both the professional and client.

As a result, the inability to realize an effective professional-client relationship, and the administrative compromises which constrain the human relationship between them, results in alienation of professionals from client needs.

> To the extent that street-level bureaucrats are alienated in their work, they will be more willing to accept organizational restructuring and less concerned with protecting clients' interests and their own connection with clients. The more tenuous the relationship with clients, the less salient that relationship becomes, and the easier it is to transform the relationship further. Thus the working conditions that give rise to alienation in work may cumulatively contribute to separating the client from the public service worker. This is significant since in earlier periods public service workers have often championed client rights and benefits. . . . This struggle has become less important as the connection between workers and clients has dissipated. (Lipsky, p. 80)

As a result, dealing with the bureaucracy becomes a far more important part of being a professional than dealing with the client.

Thus, from the perspective of the public as client, the professional is always the judge of the public interest. Professional norms and values provide an ever-present framework for assessing the public interest. The indifferent professional need look no further for guidance than that value framework. For the public-spirited professional continually seeking input from clients, the professional value framework provides a guide for interpretation. Clients, due to their fragmented voices and unsophisticated understanding of public issues, are best served by entrusting their affairs to the judgment of professionals and their expert estimation of the public interest.

The Public as Constituents: Representation

Administrators exist, in theory at least, to implement the policies of governments which derive from some conception of democratic representation of the public interest. Administrators are part of the machinery of democratic government. Thus, the granting of autonomy upon which the perspective of professionalism is based should be accompanied by a guarantee that the professional is acting in a manner which resembles the public interest. However, when advocates of professionalism seek autonomy, they are implicitly seeking autonomy from legislative authority. Professionals are consequently requesting not just autonomy, but the exercise of powers previously exercised by elected legislatures (Strike, 1991, p. 2).

> But such a view brings professionalization into sharp conflict with the basic mores of liberal democratic societies. In such societies it is generally held that ends are either to be self-chosen by individuals or that they are to be collectively chosen by some sort of democratic process. The balance struck between these two paths to ends will vary depending on the extent to which one emphasizes the liberal or the democratic part of our political equation. But neither liberal nor democratic views easily empower experts to determine the ends of peoples' lives. (Strike, p. 4)

For Strike, to empower professionals in such a manner is nothing less than to sanction a professional "coup d'état" (p. 3).

Nonetheless, the administrator is at the very centre of policy-making in contemporary government. Lipsky (1980) has shown how the policy-in-practice of government is determined by the "street-level bureaucrat" driven by an obligation to represent the interests of the client to government (p. 72). As well, he suggests that it is also the responsibility of administrators to represent government to the people (Lipsky, 1976, p. 196). Witherspoon (1968) contends that administrative agencies have become so critical to the operation of contemporary government that the legitimacy of their actions is subject to some measure of democratic accountability to society.

> So long as our government participates in control, . . . whatever the administrative device ultimately selected - departmental executive, independent regulatory commission, government corporation, or public authority - the representation principle must be satisfied in a substantial way due to the extraordinary grant of policy-making authority to these agencies. (Witherspoon, 1968, p. 243)

The task of representing others is common in the responsibilities of administrators. However, the concept of representation is not simple. It is a complex interplay of the perceptions of the representative and the represented, requiring a combination of

independent actions by the individual and collective responses to the public interests, and blending the application of technical knowledge of experts with the normative values of the lay public, all within a context of conflict. For Pitkin (1967),

> representing means acting in the interest of the represented, in a manner responsive to them. The representative must act independently; his action must involve discretion and judgment; he must be the one who acts. The represented must also be (conceived as) capable of independent action and judgment, not merely being taken care of. . . . The representative must act in such a way that there is no conflict, or if it occurs an explanation is called for. He must not be found persistently at odds with the wishes of the represented without good reason in terms of their interest, without a good explanation of why their wishes are not in accord with their interest. (Pitkin, pp. 209-210)

Pitkin offers a variety of views on representation which are useful in understanding the administrator's perspective of the public as being represented. The first are what she terms the "formalistic" views of representation composed of authorization and accountability. These deal with the relationship of the representative to the represented. From the authorization perspective,

> a representative is someone who has been authorized to act. This means that he has been given the right to act which he did not have before, while the represented has become responsible for the consequences of that action as if he had done it himself. (Pitkin, p. 39)

The accountability perspective, on the other hand, views representatives as people who are held to account, people who will have to answer to the represented for their actions (Pitkin, p. 55). From this formalistic view, legislators are then the representatives of the people as they are granted authority to act by fiat of their election, and eventually accountable for their actions at the time of re-election. Administrators consequently become the representatives of the legislators as they, too, are authorized to act in their stead, and accountable to them for their actions. Administrators are, therefore, responsible for representing the public interest, but only indirectly through the elected legislator, and even then, it is to act in the public interest as defined by the legislators.

While the formalistic views of authorization and accountability are commonly cited as the basis of representation, they are not particularly useful in describing the role of the administrator as representative.

> Neither can tell us anything about what goes on *during* representation, how a representative ought to act or what he is expected to do, how to tell whether he has represented well or badly (Pitkin, p. 58, emphasis in original)

Pitkin argues that representation is an action. She discounts the role of the representative as "standing for" the represented in either a descriptive manner, in that the composition of the representative body corresponds to or reflects the composition to the group (p. 60), or in a symbolic way, in which the representative is emblematic of the interests of the represented (p. 93). These, too, are common conceptions of administrators as indicated by Frederickson (1991) who reports that

> the public service, in a demographic sense, is more representative of the public than are elected officials. Add to that the expertise embodied in the public service and mix in the effects of equal employment opportunity and affirmative action programs and there is every possibility that the public service generally mirrors the public. (p. 403)

From this perspective, administrators are representative of the public interest in that they are, as individuals, members of identifiable constituent groups. This perspective also legitimizes the belief that, because of that membership, the interests of the individual correspond with those of the group and, therefore, administrators have a responsibility to act in their own best interests, for in doing so, they represent the interests of the group.

Consequently, for Pitkin, the essential characteristics of representation are to be found in "acting for" others, rather than in the characteristics of representatives themselves, such as how they are regarded, or the formal arrangements which precede or follow their actions (p. 144). The act of representation is composed of someone taking action instead of another, acting in that person's interests, and acting in accord with that person's wishes (p. 138). However, the basic issue underlying such actions is the degree to which representatives are required to act as their constituents expressly demand, or whether the representative is independent to act in such a way that the best interests of the constituents are satisfied. Between these two poles, there are a number of differing possibilities. At the one extreme

> true representation occurs only when the representative acts on explicit instructions from his constituents, that any exercise of discretion is a deviation from this ideal. A more moderate position might be that he may exercise some discretion, but must consult his constituents before doing anything new or controversial, and then do as they wish or resign his post. A still less extreme position might be that the representative may act as he thinks his constituents would want, until he receives instructions from them, and then he must obey. Very close to the independence position would be the argument that the representative must do as he thinks best, except insofar as he is bound by campaign promises or an election platform. At the other extreme is the idea of complete independence, that constituents have no right even to exact campaign promises; once a man is elected he must be completely free to use his own judgment. (Pitkin, p. 146)

Thus, administrators have a wide variety of perspectives to draw from in determining how they will represent, and to what degree they will be bound by, the demands of the represented. The difficulty for the administrator is in determining who is to be represented.

Viteritti (1990) observes that there is often a tendency on the part of the administrator to confuse or at least to fail to discriminate between representing the interests of clients and constituents. Clients are service recipients whose needs must be accommodated or who require administrators to advocate on their behalf as part of their professional responsibilities. The concept of client does not necessarily imply political accountability. Constituents, on the other hand, refer to the groups that elect a legislator. The idea of political accountability to these groups is essential to political legitimacy. This applies not just to the elected legislators. Administrators operating in governmental institutions that need political support to maintain political legitimacy of administrative action are also accountable to constituents (Viteritti, p. 426).

The two concepts overlap when the constituency of the legislator and the clients of the administrative agency are one and the same. This is the case of the "iron triangles" of American government in which legislators support the budget requests of administrators, who provide access, services, and favours to client groups, in exchange for support for the election campaigns of legislators (Kweit & Kweit, 1981, p. 70). A less rigid view might be that of the "captured" agency in which a relatively small, but highly organized, group receives benefits from policies in which the costs are widely distributed and perceived to be insignificant by the larger population. Wilson (1989, p. 83) argues that the captured agency results when political support for the relatively narrow interest of the client group is greater than the general interests of constituents. However, Fortmann (1990, p. 362) goes further to suggest that within a captured agency, that "agency's clientele may come to control the agency thereby deflecting it from its mandated mission. The organizational environment controls the agency".

While there are many instances of congruency between clients and constituents, there are also many in which there is very little similarity at all.

> Not all clients possess the political means to hold public officials accountable; therefore they are not all constituents in any real sense. Conversely, not all those to whom agency leaders are accountable are clients of the agency, but instead represent other interests with a stake in the policy process. (Viteritti, p. 427)

Thus, administrators who serve poorly organized and politically impotent clients are more likely to be politically accountable to more broadly based constituents. For example, the clients of specialized programs may have less impact on policy than do taxpayers. Therefore, while a professional ethic among administrators may indicate that client needs should be the first priority, political pressure from constituents may force other actions.

Another approach to this question of who is to be represented by administrators is the principal-agent relationship used by analysts such as Moe (1984) and Pratt and Zeckhauser (1985). In this relationship, the principal enters into a contractual agreement with an agent in the expectation that the agent will subsequently choose actions that produce outcomes desired by the principal (Moe, p. 756). For principal-agent theorists like Moe, this approach appears to simplify considerably the problem of representation.

> Democratic politics is easily viewed in principal-agent terms. Citizens are principals, politicians are their agents. Politicians are principals, bureaucrats are their agents. Bureaucratic superiors are principals, bureaucratic subordinates are their agents. The whole of politics is therefore structured by a chain of principal-agent relationships, from citizen to politician to bureaucratic superior to bureaucratic subordinate and on down the hierarchy of government to the lowest-level bureaucrats who actually deliver services directly to citizens. Aside from the ultimate principal and the ultimate agent, each actor in the hierarchy occupies a dual role in which he serves both as principal and as agent. The formal apparatus and deductive power of the principal-agent model are applicable to each of these hierarchical stages of government, and might usefully be employed in investigating even the most basic questions of democratic control and performance. (Moe, p. 766)

However, another view represented in the "New Public Administration" movement seeks greater coordination between the values of administrators and citizens for bureaucratic behaviour to become more clearly aligned with citizen interests (Kweit & Kweit, 1981, p. 73). This movement represented an attempt by researchers to reemphasize the normative value questions of governance which had been neglected in the use of scientific techniques in the study of politics (Viteritti, 1990, p. 431). Research associated with this view demonstrated that internal rules of bureaucratic decision-making produced a more equitable distribution of resources and, further, "that equitable distributions were more likely to result when external political influence is minimized in the bureaucracy" (Viteritti, p. 432). Thus, clients remain the principal, but the administrator is now their direct agent. The administrator is required to represent the interests of the client in the determination and implementation of policy. In a contemporary administrative bureaucracy, therefore, representation is not as simple as the principal-agent theorists suggest, as administrators

who seek to represent the public interest are continually drawn between its articulation by legislators and the demands and needs of their clients.

Thus, the essential questions for administrators who seek to represent the public interest are as follows: Whose interests are to be represented and how are those interests to be articulated? These questions do not have ready answers as the preceding discussion illustrates. However, representation implies responsiveness. To return to Pitkin,

> It seems to me that we show government to be representative not by demonstrating its control over its subjects but just the reverse, by demonstrating that its subjects have control over what it does. . . . The people really do act through their government, and are not merely passive recipients of its actions. A representative government must not merely be in control, not merely promote the public interest, but must also be responsive to people. (Pitkin, 1967, p. 232)

Thus, to represent is to respond. Administrators who view their activities as representing the public interest are therefore required to respond to public demands. Consistent with principal-agent theory, principals need not express their interests in detail or even formulate specific views, but they must be capable of doing so. When explicit views are expressed, the agent is obliged to respond in a manner consistent with those views unless there is good reason to do otherwise, and an adequate explanation in terms of other interests of the principal is in order. For Pitkin, this relationship holds for administrators.

> A representative government requires that there be machinery for the expression of the wishes of the represented, and that the government respond to these wishes unless there are good reasons to the contrary. There need not be a constant activity of responding, but there must be a constant condition of responsiv*eness*, of potential readiness to respond. It is not that a government represents only when it is acting in response to an express popular wish; a representative government is one which is responsive to popular wishes when there are some. Hence there must be institutional arrangements for responsiveness to these wishes. (Pitkin, p. 233, emphasis in original)

Administrators are part of this representative machinery, that is, part of the institutional arrangements for responding to the expressed wishes of the public. However, the public is not composed of consistent interests or homogeneous groups. The administrator is subject to numerous conflicting expressions of interest and contending values. Each requires a response. Thus, we have come full circle. The role of the administrator becomes that of an intermediary, seeking a position which accommodates to the extent possible the varying demands of competing groups. The attention of the administrator is pursued by a public

composed of organized interest groups articulating specialized interests, and we return to the pluralist perspective, the first of the four conceptions presented.

Thus, the perspective of the public as constituent is by far the most complex conceptualization of the four presented. In acting as representative of the public interest, the administrator is at the centre of the relationship between elected representatives and their electorate, and between the views of experts on what is in the public interest and the views of the lay public on those same issues. From a formalistic view, administrators are authorized and accountable to both legislators and clients. They are also called upon to act on behalf of the public interest, sometimes taking an independent stance guided by expert judgment, other times acting upon the explicit instruction of constituents, but most often attempting to achieve a compromise. The greatest challenge, however, is in determining which interests are to be represented and in what way. Here the administrator faces dual paths of representative accountability, one leading through the elected representative and the democratic voice of the people, the other leading directly to the clients, the people whom the administrator is obliged to serve. Therefore, to provide responsiveness, the essential characteristic of representative government required by both theoreticians like Pitkin and in the rising rhetoric of contemporary public leaders, administrators must come to terms with a very personal understanding of what it means to represent.

Summary

The theme of administrative responsiveness is one which echoes through each of the four conceptions of the public presented. From the pluralist perspective, the public interest is articulated by organized interests with administrators acting as an intermediary to seek positions which accommodate the varying demands of competing groups and responding to their collective interests. From the public choice stance, the public interest is articulated in the aggregate choice of individuals selecting among alternatives in a competitive market. The role of the administrator is to stand aside, or at the very minimum to maintain market freedom, for to act positively would be in itself a market distortion. Responsiveness in this case is to allow individual choice to drive public action. The professional perspective is also oriented toward the individual, but the best interests of clients are largely unknown to them and the public interest is best served through expert analysis and policy based upon specialized understanding of complex issues. Responsiveness is manifest in both defining the public interest and acting to fulfill it. Finally, in the representative conception, the administrator is acting on behalf of the public interest either articulated through the elected legislator or through the demands of clients. Responsiveness is acting on behalf of and in

the interests of those whom the administrator represents. Thus, in each conceptualization, administrators are placed in positions of responding to the public interest as it is conceived in each, and as it is voiced by the mechanism through which those interests are articulated.

The administrators in this study faced situations of contending accountabilities among legislators, clients and the bureaucracy. These contending accountabilities are present in conceptualizing the public as interest groups, customers, clients, and constituents. The participants also voiced concerns over vulnerability to those whose interests were not being met. These administrators were placed in a position in which their conceptions of the public were to some degree put to the test. The accountability relationship between administrators and the public is not clearly specified nor does it derive naturally from a single perspective of the public or of the role of administrators.

Chapter Summary and Findings

Administrators cannot conduct public consultation without reference to the administrative context of a hierarchical bureaucracy. Central to this context is the concept of accountability and its close associate, vulnerability. Administrators in this study expressed a clear understanding of their individual perception of accountability to legislators, to clients or to the administrative organization or their profession. This was represented as a hierarchy which often placed administrators between contending demands for accountability. The resulting possibility of strained relationships subsequently exposed administrators to positions of vulnerability to those representing interests whose requirements were not met.

The picture which emerges from the experiences of these administrators is one in which the administration is viewed as squeezed between clients and legislators, as illustrated in Figure 1. Administrators often view themselves as caught between the demands of legislators who may be seeking to resolve issues within a broader policy framework and those of clients who are seeking to satisfy specific individual needs. The role of the administration is perceived as that of a buffer, identifying and interpreting the demands of one group for the other. The basis of this ability to identify and interpret accurately is the professional competence of the administrator, whose knowledge and technical skill provide a basis upon which to reconcile these contending demands. This then becomes the essence of policy making in an administrative bureaucracy, the reconciliation of the contending demands of clients and legislators.

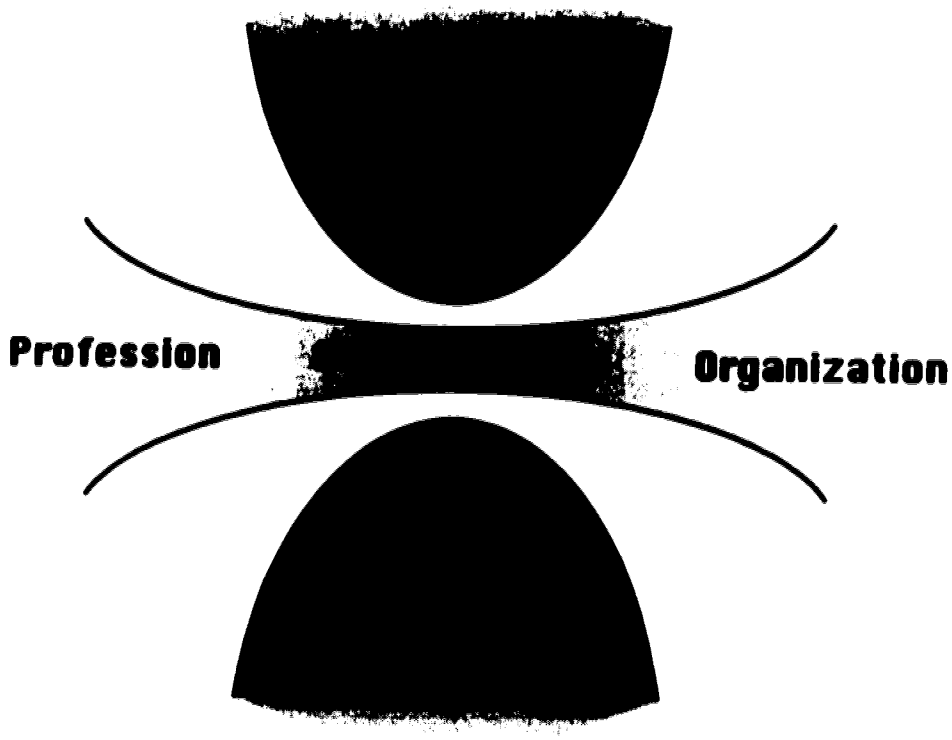

Figure 1 - The Administrative Squeeze

The perceptions of these administrators as to whom the concepts of legislators and clients might actually refer is very specific, however. Clients should not be confused with the general public. In the experiences of these administrators, clients are those in the relevant policy community with whom the administrator works, and who have the ability to bring some form of direct pressure upon the administrator to have their demands considered. Similarly, legislators should not be confused with the body of elected officials who form the government. Legislators, in the view of the administrators participating in this study, were those persons to whom the administrator was hierarchically accountable from an organizational perspective, those who exercise direct authority in the policy area. Thus, perceptions of accountability are circumscribed by perceptions of vulnerability.

This sets in motion an array of forces drawing administrators toward the interests of those to whom they feel most accountable, while at the same time seeking to avoid possible vulnerability to those whose interests may not be met. This is the science of policy formulation, and the art of administration. These are the skills of an experienced and competent administrator, reconciling contending demands by correctly interpreting the

relevant signals and applying the learned values of the organization in a manner consistent with similar previous experiences.

Consultation, however, requires contact with interests outside of the normal accountability structure. Consultation suggests an effort by the administrator to determine where the public interest might lie, what constitutes the relevant public and how the interests of that public might be articulated. These conceptions of the public are critical in understanding how administrators' perceptions of accountability guide their actions in structuring the consultation and the formulation of policy. The literature offers four broad conceptions of the public: the public as interest groups, the public as consumers, the public as clients, and the public as constituents. Each presents a perspective on who composes the public, and how their interests are articulated. However, each also represents an orientation toward the ways that administrators resolve their perceptions of contending accountability.

Figure 2 presents these four conceptions in such as way as to relate their differing assumptions regarding, first, how each conceives of the composition of the public and, second, how the collective interest of the public is expressed.

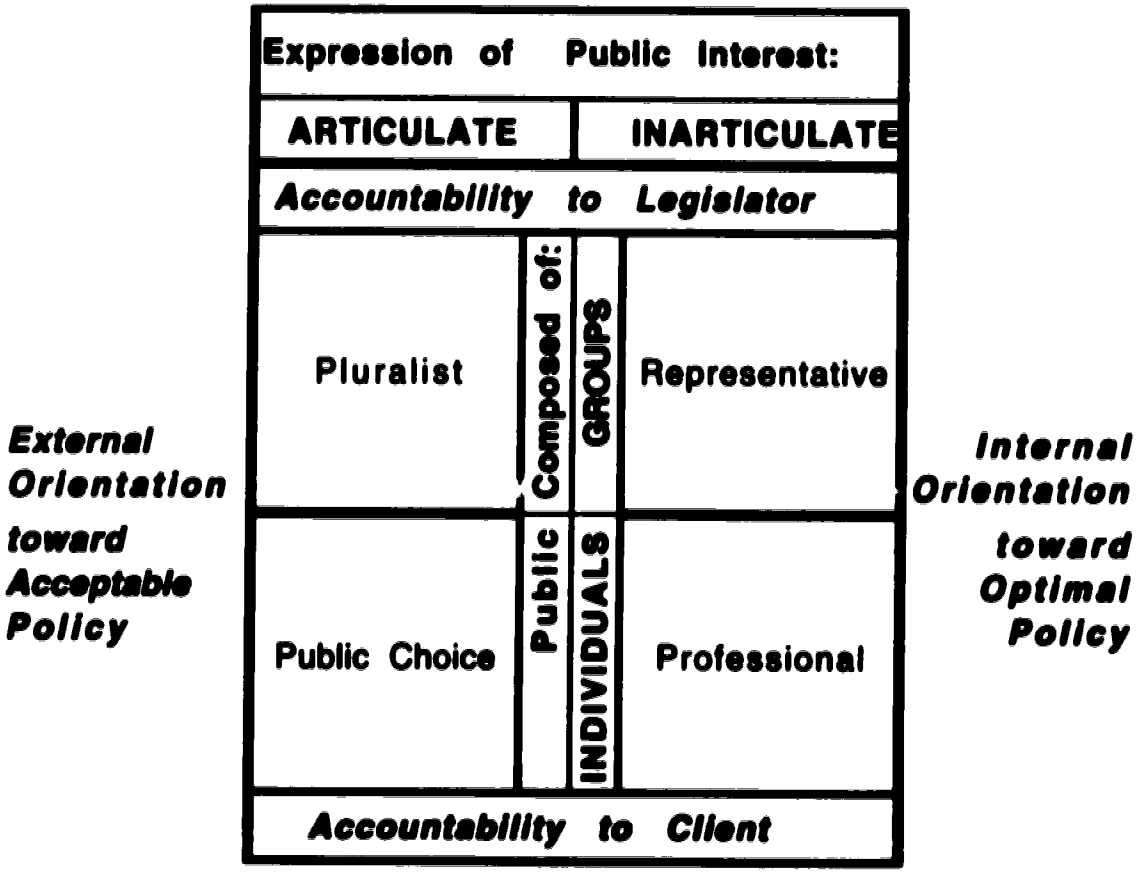

Figure 2 - Orientations to the Public

Those adopting either the pluralist or the representative conceptions view the public as composed of groups, expressing collective needs and values, whereas, those taking the public choice or professional perspective are more concerned with the public as composed of individuals, expressing private needs and values. Similarly, the perspectives on the right hand side, the professional and representative, assume the public to be inarticulate and unable to express effectively a collective sense of values, while those on the left, the public choice and the pluralist, assume that the public is quite capable of articulating its needs and values through common social mechanisms.

Relating these conceptions of the public in this way provides an indication of some of the dimensions which might apply to the formulation of policy and of how these dimensions manifest themselves in the policy perceptions and actions of administrators. It is possible to examine the perspectives of the public as client, consumer, interest group, and constituent, in order to identify the relevant value framework within which administrators adopting these perspectives might abide, and their implications for policy making.

From the professional perspective of the public as client, the public is viewed as composed of individuals who have a comparatively unsophisticated understanding of the issues that affect them and are unable to articulate their needs clearly. Their voices are fragmented and inchoate. It is the responsibility of professionals to respond to these needs through the application of professional knowledge and judgment. Thus, the professional value system provides an ever-present framework for interpreting and acting in what they consider to be the public interest. The professional perspective is to pursue policy solutions that are acceptable to and in the best interests of clients, while remaining relatively unconcerned with any accountability to the legislator or with the more general value structure of the community.

The public choice perspective, or the conception of the public as consumers, also takes an orientation toward the needs of the client as expressed in the personal preferences and actions of individuals in the marketplace. Contrary to the professional perspective, administrators adopting public choice attempt to have client needs met within the context of the more general values of the community. This perspective is premised on the assumption that the expression of the public interest can only be found in the sum of individual choices, and that community values will be expressed in the preponderant choice of individuals. The public choice perspective is based upon the absolute liberty of the individual acting in a free market system, unrestrained by institutional distortions. Therefore, this conception of the public rejects, and is often employed to defeat, the dominance of institutional or

professional value structures. In a similar vein, accountability to legislators is of lesser importance because legislative intervention is alien to the unimpeded operation of a free market. From the public choice perspective, policy must be acceptable to those affected, as indicated by their individual actions to implement that policy.

Directly opposed to the public choice perspective is that of the representative conception of the public as constituents. From this perspective, accountability is to legislators in their capacity as elected representatives, acting within the value structures of the institutions and professional standards of government. Administrators are, in effect, the representatives of the legislators, having been authorized to act in their stead, and accountable to them for their actions. As representatives, administrators are expected to act with some degree of independence. However, this discretion is bounded by the institutional and professional value structure of government, established and continually legitimized by the democratic processes which created its traditions and culture. As the representatives of legislators, administrators have an obligation to constituents. However, constituents are not the same as clients, as the concept of client does not imply any concept of political accountability otherwise associated with the legislator's accountability to a constituency. Thus, within this perspective, there is no sense of accountability to clients, particularly those who are poorly organized and politically weak. Neither is there an obligation to respond to community values, for to do so would be to step outside of the legitimate bounds of the institutional/professional value structure of the governing legislators. To reinterpret those bounds would be to usurp the responsibilities of legislators. Policy making from the representative perspective is, therefore, the pursuit of the optimal solution to policy problems and what is in the best interests of constituents, as defined by the representative of the people, the legislator.

However, the final conception of the public as interest groups, or the pluralist perspective, views the administrator as acting as an intermediary in reconciling conflicting interests in an effort to identify community values and to convey those values to legislators. Within this perspective, administrators are accountable to legislators, for it is they who are responsible for the enactment of the public interest, the net result of the interaction among competing groups. In the pluralist perspective, it is the role of the administrator to work with interest groups to develop a coherent value system upon which to base public policy. Interest groups provide a vehicle for the articulation of interests, and a mechanism for the negotiation of a mutually acceptable resolution of competing demands. Administrators adopting the pluralist perspective are not accountable to individual clients as their interests are expressed through the collectivity of the various interest groups. Similarly, often

institutional and professional values structures are considered to be those of only one of many competing interest groups. Policy formulation is once again the pursuit of an acceptable solution, one which can be supported by the groups representing these contending interests.

From this analysis derives two clearly different values frameworks which have very different implications for the formation of policy, as illustrated in Figure 2. On the right side of the figure are those who conform to the value framework of the organization or profession with which they are affiliated. Thus, those adopting representative and professional perspectives consider the formulation of policy to be internal to the organization. Largely due to the public's inability to articulate value positions clearly, administrators holding these perspectives pursue an optimal policy resolution, or one which is technically best in terms of the perceived collective interests of either clients or constituents, based upon the professional or institutional value criteria provided through the organization with which they are associated. On the other hand, those adopting the pluralist or public choice perspectives operate much more within the framework of values existing within the general community. Policy formulation then becomes external to the organization, no longer responding solely to the internal needs of the organization, but instead pursuing policy solutions which are acceptable to those affected. In this case, acceptable does not necessarily mean optimal, because what might be technically the best policy choice may not be a choice which is consistent with the value framework of the community.

Therefore, administrators exhibit a wide variety of orientations in their approach to consultation. They experience contending demands for accountability accented by feelings of vulnerability. They see the public as comprising either individuals or groups, and as being either articulate or inarticulate in their expression of their needs and values. Finally, they respond to differing value frameworks, that of the institutions or professions with which they are affiliated, demonstrating orientations toward policy processes which are internal to the organization and oriented toward optimal policy solutions; or that of the value system of the community, demonstrating orientations toward an externalization of the policy process and toward policy solutions which are acceptable to those who are affected by those decisions.

Public consultation has not been a component of the traditional duties of an administrator. Even when commissioned to identify where the public interest might lie, let alone Reich's exhortation to enable democratic governance by articulating public values through public

discussion, there are no clear models for identifying the public interest or for entering into public discussions. Administrators are left largely to their own values and conceptions as they approach these tasks. These are molded and constrained by the administrative context within which administrators operate. Nonetheless, administrators retain considerable discretion in the structuring of public consultation, which contributes significantly to its outcome. Thus, it is the activity of involving the public in policy decisions that we turn to next.

Chapter 5

The Contribution of Public Consultation to Public Policy

Chapter Overview

Chapter 5 discusses the actions and strategies used by administrators in the structuring of public consultation. Included are the perceptions of the administrators participating in this study regarding the role which they play in the consultation process and the techniques that they used to structure the consultation. Subsequently, the overall impressions of these administrators regarding the contribution of the consultation to the policy process is presented. Next, a number of models of public participation are provided in order to locate effectively the role of consultation among other forms of citizen participation. The techniques referenced by the participants are discussed in terms of the prescriptions of leading public participation practitioners in order to provide some insight into the principles of effective consultation. The chapter concludes with an examination of how the structuring of consultation affects policy outcomes.

The Role of the Administrator in Consultation

All of the administrators who participated in this study viewed their role as being primarily responsible for the process of consultation. In designing and conducting public consultations, these administrators were challenged to select strategies which best served the needs of the policy process and to obtain the outcomes required of the consultative process:

> My role basically was the design of the process and to make sure that it all came off. . . . Basically we were asked by Cabinet to design a process that would allow for extensive public consultation in the development of the new . . . strategy, so that's basically what we did. Once the process was accepted, it was basically to put it into action. . . . Our role is basically to support Cabinet. We're not doing this independently of Cabinet. By and large, this is the Premier's initiative, and our job is to make it work. (Bruce 16)

Some administrators were very clear that accountability for the process alone was the full extent of their responsibility. "I can say that I am not accountable for the decision. I am

just accountable for the process, how to get that decision which is then ratified by the minister." (Glen 18) Thus, the role of the administrator was that of a facilitator. "We're there to listen, to help them reach a conclusion, to provide information, information not judgment, information where they need it." (Adam 33)

The importance of the process to the final outcome was not lost on any of the administrators:

> The optics in terms of how these things are done is so very important. People have to see that it's being done in a way that's competent and there is a plan for doing it, that people can be confident that the process is well thought out and that in terms of what the eventual outcome is, is also going to be equally well thought out and well [illegible] (Bruce 30)

One participant pointed out the significar [illegible] fusing the outcome with the process:

> When you are doing things, nc [illegible] do you are going to have someone complain. . . . No m[illegible] the minister is going to get some letters about it, and all h[illegible] as part of the process, not as meaning that the process has [illegible] That's the risk, that it can be taken as "things aren't handled well enough the process is going off track." (Julie 24)

For another, the personal implications for failed outcomes were also very clear:

> I suppose that if in the end the whole thing doesn't work, I'm the likely person who's going to be [illegible] for it. That's just the process. (Bruce 16)

This administrator indicated the substantial new challenge for administrators in conducting consultations:

> For us it's new, because in some respects we don't know how it is going to end up. . . . When you don't know where you are going with this thing, it's something that you don't control. Quite frankly, in terms of the [previous consultations] that I've been involved with, we are very used to minimizing risks and to knowing the outcome before it happens. This is different because we have invested more in the process rather than the outcome. (Bruce 32)

Administrators are, therefore, accountable for the process, but there is a recognition that accountability will to some degree be measured by the outcomes of the process. There are risks that unacceptable outcomes will be blamed upon a faulty process, or that unanticipated outcomes of the process will be difficult to accommodate. Not all administrators are willing to accept those risks. As one administrator noted, "I guess everything I've said

comes down to fear and insecurity, and wishing to maintain one's position as a bureaucrat or as a politician that limits people's ability to act." (Greg 17)

Thus, the various steps in the design and implementation of the consultative process provide a number of opportunities to influence the outcome of the consultation through either actions implicit in the method, or explicit actions aimed at achieving certain objectives. These steps include: (a) timing in the policy process, which has been discussed above, (b) selecting public participants; (c) setting the agenda; (d) setting the information base; (e) consulting techniques; (f) compiling results; and (g) recommending decision alternatives.

The Composition of the Consulting Public

The critical first step in consulting the public is to define specifically who the relevant public is and how they can be involved in the policy process. The vast majority of participants identified the public as organized groups who were referred to as stakeholders, clients or special interest groups. Defining the public in terms of organized interests for some was, quite simply, easier, because "They've got a telephone number where they can always be reached, they have an obligation to their membership probably to maintain some links back and forth, to share information." (Ann 04) It was also a matter of cost efficiency:

> When we did our mailing, we mailed not to individuals, but to organizations in hopes that they would spread the word. That was as much a cost factor as anything. It was the best way to reach people, through the organizations, but the mailing was quite extensive. (Lisa 06)

Therefore, organizations have the capacity to provide a structured vehicle for conducting the consultation:

> We felt that the role of the association was quite important because they did represent a larger network so we made a point of going out and contacting them and wanting them to basically involve their membership in developing a submission. (Bruce 10)

However, the organizations identified as potential participants in the consultation were most often defined by the mandate of the organization:

> I think in our experience in our department in the 20 years that there has been a department . . . that we have a pretty good reading of who the public is, who we have to go to listen to, what their concerns are, and to take that information back into the department and digest it and come up with what we think is a reasonable approach to consulting. We normally

> aren't too far off the mark. But it's premised on our conscience, whether we think we have a good reading, and understanding for who the publics are because it is very difficult to define that particular question. (Jim 16)

While commonly dealing with organizations as the primary vehicle for public consultation, the administrators in this study reported a number of problems that arise from this approach. The first was that of determining the outcome through selection of known opinions. This was a source of some frustration for one administrator who observed that "Some groups weren't involved. . . . So it's whatever positions, biases we hold in this area, that condition who we accept and who we don't." (Ed 03) The essential difficulty was a built-in structural bias toward existing policies and positions. "You're still talking about a group that believe in the system. You still didn't talk to the people who did not believe in the system." (Gord 19)

The second problem was that of representation. Concern was expressed that organizations were not adequately representing the views of those whom they purported to represent:

> One of the dilemmas, one of the things we spend a lot of time figuring out is, in the [client] communities, they tend to have people who speak for them. It's often very difficult to ascertain whether they are speaking for the community or for themselves which is not any different than any leadership position. It's one of the things we haven't been successful in, and have never been successful in, is getting more individuals to come out and speak what they feel. Very seldom do we get that. I don't know if we are unique, I don't think we are. I think it's always difficult. You always get organizations to present. (Jeff 21)

Another expressed a similar concern regarding the ability of individuals to represent broader interests:

> Can you assume that industry organization leaders, the Chief Executive Officers, and general managers . . . do they have the broadest perspective? That's asking a lot of an individual. Is the information that you collect as broad and complete and reflective of the majority . . . of people in the industry? (Ann 04)

Most just accepted that they were dealing with individuals who represented larger groups, and they laid out the expectations of the consultation:

> We leave it up to them whether they come as an individual or as a representative of an organization. We just expect them to represent the interests of the consumer or the industry. (Julie 06)

But many had doubts that in the relatively short time available during the consultation, that the individuals could respond effectively. "Poor guy from the [client organization], just

one individual, it's kind of sticking it to him to say 'Tell us the [client organization's] vision' ". (Ann 05) And others were more concerned about more overt manipulation when those conducting the consultation "all brought their own agendas in and sometimes you get stuff coming out and you really couldn't figure out where it was coming from." (Jeff 09)

The third problem was that of allowing participating organizations to self select. Typically, administrators tried to make public consultations as open as possible. "We didn't choose [participants]. We sent them all the information, this is what is going to happen, here's where they are going to be. . . . Become involved, that's your choice." (Art 19) But while this appeared to be open, in most cases participation was determined by the communication channels:

> Basically it was wide open, we didn't target any specific group as such. We left the field wide open for anyone who felt they had something to say. Over and above that, there was a mailout here. We contacted most major associations, business and otherwise across the Province, . . . basically associations . . . that felt they might have some interest in terms of having a part in developing a new strategy. (Bruce 07)

This problem was recognized by one administrator who acknowledged that an important group of clients would not be informed about the consultation through organizational structures. "We couldn't tap into that population, so I guess one of the problems is that we don't have access to a group that we think is legitimate,. . . so we can't identify that body, that population, to sample." (Greg 02)

Direct recruitment of participants into the consultation left whoever was making the selection open to allegations of bias.

> The final decision was the minister's. In the final analysis, he chose a couple of groups that he wanted to be there. Ministers aren't always right, but ministers are always ministers. (Adam 14)

Another administrator voiced similar concerns:

> I don't want to be negative here . . . but if you look at the people who were invited, they're very finely hand-picked. . . . I believe that if you are going to get good debate, . . . you can't ignore every [stakeholder] out there. (Jan 14)

Self-selection presents another set of difficulties in terms of who is likely to participate as a result of a self-selection process that produces:

> another level of reality, which is those who express an interest. . . . We send them a document, that's an instrument that should heighten their

> participation and involvement. But often, in this case being a very technical document . . . with gobbledygook, it was a quasi-legalistic document in the way it was written, and I think that the bulk of the people who are invited to get involved in a process are presented with instruments that are too complex, too time consuming to really get involved. Rather than saying, "We're going to be screwing around in the system, are you concerned?" We basically said, "This is what we're proposing to do", in legalistic terms, "about the technical operations of this thing", with the hidden implications, not even clear to us, certainly not spelled out to the public. Its consequence is that people have to generate a lot of interest and energy and attention to the matter, to break through the bureaucrats' technical language, to understand what it is that we're trying to say. (Greg 04)

The result of self-selection from this person's perspective is that:

> You get the people who depend on the system, not for livelihood, but I would think more for organizational existence. And they have the resources, and they recognize the place that this [initiative] . . . has for them. It may be real, it may be imagined, but it is a tool for their survival on a day to day basis. . . . (Greg 05)

> They will analyze the new proposals out of self interest, not out of support for [the program], or the [clients] for that matter. They will look at that total proposal and see which elements in the existing [program] allowed us to exist, and the changes that are being made. What probability is there that they will impact on us and our existence negatively? Those are the things that they protest. (Greg 06)

In recognition of the problems inherent in working through organized interests, some administrators attempted to consult directly with individuals:

> Most of the issues that we deal with today do not fall into the purview of any one government jurisdiction, or within any one societal jurisdiction. So one can't just go to the advocacy groups. One has to try, through consultation, to meet the mind of the individual, the community person and somehow get beyond the advocacy turf types of things which sometimes happens. (Mary 13)

Involving individuals in consultation was enormously more difficult "partially because I don't think [the program] is perceived to be an individual issue. (Jeff 22) . . . How do you get to the level of the individual and make them feel that this is personally affecting his or her life? That would be the secret." (Jeff 23)

The difficulty is consistently one of resources and the constraints of administrative processes:

> We have I think over the years, understood that you are not going to get the John Q. Public off the street, involved in the process unless he or she

> wants to be. And when they come forward, you have to provide that opportunity for them, whether they are part of an organization or whether they are just a concerned individual. You can't exclude them from the process. And that means providing them with opportunities which means time and resources, and in most cases there is a constraint. There has to be a line drawn somewhere that will likely mean that somebody will not get the opportunity and that somebody else will. (Jim 17)

Even once individuals have been given the opportunity to participate, it is still not possible to assume that the conclusions of the consultation are an accurate reflection of public opinion:

> One also has to keep in mind that although 80% [of individuals participating in the consultation] may say a thing, that does not necessarily mean a thing is correct. Because there could have been a high proportion of that number that weren't necessarily informed on that day when they were having that conversation about whatever, so I think one has to think all of that through, and keep it fluid, keep it flexible, build on relationships so that you are able to use your consultation mechanism to have a discussion to, not sign on the dotted line, that "by implication of this conversation, you agree", which would start tying people's hands. I think that no one would end up being very open if there was such a direct connection between the input and the decision. One starts to compromise the process somewhat. (Mary 04)

So while many administrators in this study sought the involvement of individuals in the consultation, it was very difficult to incorporate their views in the policy deliberations.

> In the final analysis, I don't think that a thousand written responses were equated to three good meetings with large groups that hold political sway. I'm convinced that those groups got their way, because they were organized and they have the representative constituency. (Ed 02)

For this administrator, the result was less than acceptable:

> What I would say is that we're minimizing the validity of and the credibility of the individual in the public, participation and policy making. And we discount the public as an unorganized entity as having value for the exercise. . . I think we become a victim of the process and we then shift to the political players and if we address them, and if we appease them we then we basically say that the rest will be served with whatever they get. (Greg 10)

Thus, although the identification of the relevant public is critical to the outcome of the consultation, the constraints under which consultations are conducted result in substantial structural limitations on participation in the process. The public is usually defined in terms of organized interests, determined by the historical mandate and associations maintained by the consulting organization. Administrators are aware of the problems inherent in viewing the public as organizations and those arising from consulting with only those with known

opinions, from inaccurate representation of interests, and from self selection bias. However, in most cases the cost of seeking broader involvement is not warranted by the value of the information gathered.

Setting the Agenda

For almost all of the participants in the study, it was the responsibility of the administration to assist in narrowing the scope of the consultation to a process that was manageable within the resource constraints. This involved selecting and articulating the issues to be examined.

> The issues came from the [administration], . . . based upon the input and experience that we had on a regular basis with the . . . community. (Lisa 04) . . . People were invited . . . to discuss whatever they wanted on the issue, it needn't be confined necessarily to what we felt was the issue, it was just to give some sort of structure to the meeting. We quite expected that there may be groups which may have other issues which they wanted to discuss which we hadn't thought of. In hindsight, much to my surprise that did not happen. Everyone seemed quite satisfied . . . (Lisa 05)

Many felt that narrowing the agenda was necessary for effective consultation, based upon a sense of fairness to those who were participating. "I think that if the government is firm on something, it is firm, and I think that the stakeholders have a right to know that. But if there is room for [movement], then they've got to know that too." (Peter 20)

> What we said to people essentially was "Here are five [options] that we see as possibilities", and of course, when you're consulting, it's only fair that people know what you are willing to consider. And so what we attempted to do was to say, "These are five things that we are interested in looking at. They are within the realm of possibility, and we'd like your comments on them. There may be others that you think we should be considering. If there are, let us know." But I think when you are consulting, that it's only fair that you put limits on what is within the range of feasibility. (Peter 10)

That approach is not always acceptable and often creates suspicion of the true motivation for consultation:

> We come up with what we feel are a good set of alternatives on which to take to the public. We've learned over the years that the public does not necessarily see that as a fair process, that within the alternatives that are generated by government or non-public groups, that there is a certain reluctance to accept that fully, that there are these hidden agendas, that people don't feel that they have been given a chance to influence the process from the beginning and bring forward ideas and concerns about issues. (Glen 08)

There were other motivations for agenda setting, however. As one administrator observed, "There is selling and telling involved in all these things." (Peter 20) Consultation provided a vehicle for the realization of personal agendas. One participant indicated that this was a natural human trait:

> We all have our own agendas, that's the reality. I don't think I am any different than you or anyone else. I try to be objective. I work with that, and I know some people don't. But I try to. (Ed 16)

Another participant suggested that personal agendas went well past a personal inclination toward a particular policy position:

> I think that there are bureaucrats that have a self-interest and that self-interest has nothing to do with the public interest. I hate to say it, but there is probably a fair amount of that. As a career civil servant you see it all the time. (Gord 39)

This perception of self-interest seemed to underlie much of the perceived skepticism on the part of the public regarding the utility of public participation, and impeded efforts to encourage public involvement:

> That's the fear. It's one that I have. It's one that I have heard when I am talking to [clients]. . . . "What the hell's the point of responding to that questionnaire or a series of issues expressing my opinion to [the consulting agency] because [the administration] is going to do what the hell they want anyway in the final analysis." . . . I think that if there is that kind of analysis out there on the part of the stakeholders, it's a *fait accompli*, we suffer for it because they won't participate. . . . I'm saying, "Hey look, if you don't participate and you don't make your input, your voice just isn't going to be heard." And then it's going to turn out that way because what will be said is basically this, "There's no interest". (Ed 02)

This administrator felt that some of the responsibility for this cynicism had to be borne by other administrators who took defensive positions in public forums:

> What you've got to do is be damned sensitive in term of your approach. . . . Like you've got to say, "Whose responsibility is it to set the pace?" . . . They've said it, "We don't trust you guys. Why are you here? You're going to do this anyway, do it. What are you bothering us for?" This kind of thing. What even makes it worse, is when . . . the bureaucrats begin to lash out, begin to get argumentative. . . . And what that does is, it obviously right now has that audience take a reading. They take a reading and say, "Why is that guy defensive? He's got a position on this and he's here to try to solicit support for what it he wants to bring about. . . . We're hear to tell him that this is a bad idea and he's not going to listen." (Ed 05)

However, another administrator felt that the perception that the agenda is a *fait accompli*, is a result of the position that the public participant has taken on the issue:

> I know there are lots of occasions when . . . they say, "Why the heck are they asking these questions, they have their minds made up now already. They aren't going to listen to us." But there are lots of other occasions when they say, "Hey, that was really good. We got a chance to say what we wanted and it came back out and they actually listened to what we had to say." It depends on the person's own experiences. . . . There will be some people who will go and argue against the [initiative] and some who will go and argue for it. And [the agency] decides to [approve the initiative], and the guys who were there for it say, "That was great, they listened to what we had to say", and the guys who weren't in favor say, "They never listened anyway. Why did we bother wasting our time?" (Ron 23)

Therefore, setting the agenda for the administrator has both benefits and risks. One perspective suggests that an open and honest dialogue is only possible when the bounds of that discussion are made clear. However, the act of restricting the discussion can create a suspicion that the dialogue is not open and honest and it is based on hidden motives and objectives. There is evidence that there are instances in which these suspicions may be well founded, and others in which they are an artifact of perception. The common basis, however, is a relationship between the administrator and the public which lacks a degree of trust.

Setting the Information Base

Linked to the task of agenda setting, another very common step within the process of consultation is to establish a common basis of information among the participants through distributing of discussion papers or background documents, conducting technical studies, or offering displays and open houses:

> We had to achieve that basic understanding about just exactly what the issue was that was being addressed. And in order for us to ensure that there was an adequate level of understanding, we needed to prepare background documents in layman terminology that dealt with a whole host of issues that were highly technical in nature. (Jim 08)

For some administrators, the issue was simply one of marketing. "We are not doing a very good job of telling our story to the public, and that's where a lot of the misinformation emerges." (Ann 23) But particularly in areas of sophisticated technology, administrators sought to educate the public concerning the issues in question:

> We think that at the time that there wasn't a complete understanding of what some of the concerns or issues amounted to in the minds of general

> Albertans. . . . You had to bring it down to a lowest common denominator that people could understand and readily accept, and in order for them to provide us with feedback as to what their concerns were. (Jim 09)

However, for this administrator, the fact that the public had such a low level of understanding on the issues reduced the degree to which the consultation influenced the policy recommendations:

> It had an influence on [the recommendations], but if there were any change, the change was indicative of the lack of understanding that Albertans had about "Do we have a . . . problem in this Province?" . . . There was a need to look at the divergence of view and opinion and be able to determine what kind of steps we would have to take to deal with that different opinion. (Jim 11)

It is the technical and scientific resources of the government which are the primary information base offered by administrators:

> We provide the science, that's part of our responsibility. We can't expect the public to do so, and the public also expects that of us. For that decision to be representative both of the science . . . and to be representative of the social values and the public expectations and the public needs of that particular resource, that is part of the formula that you add up to come up with that final decision. Science plus public input equals that decision. (Glen 07)

Thus the information upon which the decision is to be based very often begins with science:

> Science is either black or white. The public's feelings on things are not so simple. So the public involvement program that we bring, whether it's a very small scale letter campaign or a full blown integrated . . . planning program with workshops and open houses, etc., . . . has to be based on the value which we feel is required to generate the decision which is both scientifically and socially appropriate. (Glen 07)

The science upon which information is based is being challenged more frequently, however:

> That's part of why the public has come forward so strongly to become more actively involved in the pre-decision making process so that they can challenge the science . . . and actually contribute to the value of the process in that respect. . . . The goal of the public has to be more than just "Here's the science, respond to it". . . . [We think it should be] "Here is the science, now how can we add that other dimension of the social dimension in addition to the scientific dimension to get the final decision." (Glen 10)

In this administrator's view, public acceptance held a dominant role in the decision:

> It still may be a scientifically accurate decision, but for us it has to be a socially acceptable decision, and let's face it, the socially unacceptable decision is going to be the most difficult to either approve or the most onerous for us to be accountable for. (Glen 07)

However, in the view of another administrator, the relative importance of science was dominant:

> Some of the things that the [consultation] brought into that process reinforced what the experts felt needed to be changed. Some were in direct conflict undoubtedly, and not all of that conflict could be resolved, and in that case the experts win. (Art 36)

In initially structuring the consultation, administrators seek to establish a common basis of understanding about the issues in question, and the current state of knowledge about those issues. This is typically considered to be a public education process which will improve the quality of debate on the issues. However, because the public is considered to be relatively uninformed on the issues, the value of their input is devalued. The basis of information which is established also determines to some degree the direction of the debate and ultimately the outcomes. Thus, in using the substantial technical resources of the administration to establish the information base, there is an opportunity to exclude contending opinions which conflict with those of the technical experts.

Consulting Techniques

The administrators in this study used an extremely wide variety of techniques in the various consultations for which they were responsible. These included formal public hearings, public meetings, facilitated small group discussions, advisory boards, selected stakeholder task forces and committees, independent review panels, personal interviews, public opinion surveys, solicitation of written submissions, and educational displays and open houses. It is well beyond the scope of this study to examine the utility of individual techniques in the formulation of policy. However, from a more general perspective, the selection of consulting techniques was central to whose interests were voiced and how those voices were aggregated and, thus, to the outcome of the consultation itself.

For most participants in the study, public consultation meant attracting a wide range of interests in order to build a broad consensus or to gather as much information as possible on the issues.

> Typically, we don't put any limits on who wishes to give an opinion. . . . You have to do that if you are doing it properly in my view. There is no point in going out and limiting your input, because you run the very real

> risk of . . . [missing] something that you didn't uncover through lack of trying, or ignorance, or honest error. . . . Nobody has a monopoly on good ideas. There are a hell of a lot of good ideas out there, and unless you invite people to give them to you, . . . you are not likely to get them, simply because those people might not be aware that the process is going on. So my personal perspective is to open it up as wide as possible because we want everybody's good ideas. (Peter 08)

Participation is therefore one of the outcomes of the process. Once the consultation process was implemented, administrators had to accept whatever participation they received:

> We were quite pleased with what we got actually. Certainly in terms of the submissions received we were quite pleased. . . . In terms of the . . . softer groups, those that are looking at social issues and groups that have a less direct stake in what an economic strategy might look like, it would have been useful, we would have liked a little more input from that side. (Bruce 08)

However, most administrators also recognized that the process that they had implemented contained obstacles for getting people to offer their opinions:

> Everybody says do forums, but maybe there is a better way of making personal contact with people than saying "come and make a speech to us". Particularly for people who do not like to get up and talk in public. (Ron 19)

This administrator suggested the use of advanced telecommunications to provide the public with greater access to administrators and broader participation in specific consultations:

> People outside Edmonton are sometimes reluctant to call provincial officials. There are lots of professional activists who have no fear at all, but the general people have the mistaken impression that if they call they are never going to get to talk to any one who occupies any sot of important position. (Ron 19)

Another administrator recommended flexible consultation structures that may be easily revised to give more opportunity for those who are reluctant to speak publicly. "We quickly put together informal meetings. . . . There are some people who will not talk in front of a group and that's understandable. So what we did was . . . a lot of one-on-one, small group." (Jeff 14)

Other administrators accepted that some people may have an interest but were unwilling to state an opinion in a public setting. It is this passive approach which supports the widespread use of open houses and information displays so that "people who weren't too comfortable speaking in a public forum could simply come and look at displays that were sponsored by members of the advisory group." (Jim 08)

During the consultation, there are many aspects of group dynamics which determine the participation of individuals and the outcome of discussions. One administrator was pleased that participation in a smaller forum had a restraining effect on some of the more vocal interests:

> Interesting enough, when you get the placard carriers in the group, the group disciplines them and they don't say the same things anymore. . . . I'm telling you, its amazing what they say behind closed doors, in a group of people who understand each other. . . . They recognize when other people are trying to put one over on them and they also recognize that other people recognize it when their trying to put something over on someone else. They are silenced in some of their most strident arguments. (Adam 34)

Another outlined the difficult situation of attempting to solicit the opinions of the lay public in the presence of technical experts:

> Sometimes it was hard at the beginning. Consumer representatives were just overwhelmed by some of the [technical] experts. "They've been running this forever and they know what's good and what isn't." But over time you find that the consumers speak up more and more. . . . What I felt early on was that some of the [technical experts] were just monopolizing the discussion, but I think most of the consumer people said that they learned from that. That was OK for them at first because they weren't sure at first what kind of input they could make. They needed a period of learning. "How do I fit into this?" (Julie 11)

In this case the administrator has made a concerted effort to ensure that the voices of the public representatives are heard above those of the experts. Clearly, this sort of personalized attention is not practical in broader consultation exercises.

> What I look for is trying to make sure that I get participation from everyone, and that I get a sense that we are meeting all the different needs. . . . And I try to sense whether . . . anybody's not happy and maybe not expressing it and try to explore it. I've done more than just chair the committee. I've gone out . . . and met with them individually. "How do you think things are going? Is there anything that you haven't been able to get on the table? What do you see as some of the things that should be put on the table in the next year?" And then make sure that we get them on the table. (Julie 10)

Despite the efforts of individual administrators, it is very difficult to accommodate the activities of others who may also be consulting with the same client groups at the same time. The rapid popularity of public consultation over the past decade has led to a degree of consultation saturation in many sectors. "It becomes a double edged sword for the [clients]. On the one hand they certainly want to become consulted but, on the other hand,

they sometimes feel inundated with questions." (Peter 04) The message is becoming clear in the view of one administrator:

> "For goodness sake, don't try to change anything else. We can't handle it. Stop asking us to write you letters. Just get on and do the thing. You've asked enough questions. . . . We can't handle all this and do our jobs". . . . They're sort of getting a dose of their own medicine, because the [clients] have been screaming for consultation for a long time, and have been very successful in achieving it, so successful that they don't know how to handle it all. (Ron 22)

Some administrators are now revising their consultation techniques to respond to this saturation. This administrator is seeking to reduce public involvement to only those who want to be involved:

> I think that people have been public hearinged out. I think that we would be much more effective to bring in the players that we need to bring in, those who have been involved with us, those who want to be involved with us, those who should be involved and have them address it in a highly specific issue driven forum. (Jeff 25)

Others believe that the public will no longer wish to participate:

> You're doing so much that . . . you run a big public involvement process and no people show up. "Well, I guess they're getting a little sick of this." It's up to them to say, it's not up to us to say, "Too much public consultation, better cut back a bit". They have to start coming to us and say, "Enough's enough." (Glen 24)

However, this administrator is willing to take action to discourage further public involvement:

> Once the public feels they now understand how you make your decisions, what information goes into making your decision, they'll start backing off. . . . In our . . . crisis management [program], if there's a [problem], we're going to call you out. There's always a few little problems at three o'clock in the morning. You go out and get all those people in and see what we actually do, and see what damage actually occurs and after you do that two or three times and wake people up at three o'clock in the morning, they see what goes on. They have greater confidence plus they just don't have the kind of interest or energy to participate, so they will back off. (Glen 25)

In choosing consulting techniques to attract public participation, there is also the chance that those techniques will silence voices which are significant to the issue. Administrators are aware of these limitations and either accept this inherent selection as part of the process, or attempt to adjust the process to accommodate the needs of excluded participants. Group dynamics also play an important part in the articulation of certain opinions, as do the

competing consulting activities of other agencies of government. As a result, the range of voices heard in each consultation is limited.

Analyzing and Compiling Results

One of the most difficult tasks in public consultation is compiling the results. There was a tendency among the participating administrators to approach the analysis from two directions: the preponderant opinion of unorganized interests, or the consensus of primary stakeholders:

> As a professional, you try to weigh in terms of numbers, what percentage said this and that, and that was always reported. But you also weigh what you know, in terms of your own knowledge, what are significant groups, and what do they have to say, who are the lead stakeholders, whether it be for economic or political reasons. . . . So those are always taken out and recorded. (Gord 11)

A statistical analysis of responses to the consultation was a basic task completed in almost all consultations. However, this basic activity created fundamental difficulties in understanding the results of the consultation:

> The difficulty that I've seen in a lot of these surveys is "Where is the breaking point?" Is it 51%, or is it 60 or is it 90? I don't know. What I'm finding is that in some of the public input, . . . the spread is something like 65% for and 35% against. . . . What bothers me about it is who makes the decision as to if 35% can stop it or is 65% enough to make it go? Somebody has to decide and it's a moving target depending on what the issue is. How do you approach this scientifically? (Ed 07)

Another administrator also noted the problems of dealing with fluid publics and dynamic issues:

> We can take the results of the consultation we have and say, "OK there seems to be support for A, B, and C, so we'll do A, B, and C." What can happen . . . is that once A, B, and C are communicated as a decision, those same people that said, "We support A, B, and C", now that it may affect them as individuals, rather than as commentators, may say, "No thank you. That's not what I meant." So its a dynamic relationship, not only because sometimes people soft shoe around what they say, but even with the passing of a year or two, things are changing so very rapidly, the like of which the most of us have never seen before. (Mary 03)

Another administrator similarly indicated that even unanimous support, or in this administrator's terms, a "complete consensus", may not be useful in decision making:

> I will use two words and connect them, consensus and leadership. There's a difference between achieving consensus and needing complete consensus

> [unanimity] to make a decision. Leadership is making a decision in the absence of a complete consensus. If you get everyone to agree and then you do something, that's not leadership. . . . And if you do get complete consensus and you get unanimous agreement, they are so motherhood and apple pie that it doesn't lead to any strategies that lead to effective action. (Adam 07)

However, another administrator felt that it was the process which was important for effective input into policy decisions, and that understanding the process will result in understanding the decision:

> People understand what consensus is. They know that they have been heard, that their input, whether it agrees with some else or not, it was documented, it was put on the table in all the discussions, and given fair consideration, and the decision did not shake out their way, but the majority of the people understand the process. . . . They understand that we maintain the responsibility and the authority to make the final decision. . . . We are still always going to have some radical fringe people who will never accept the process. (Glen 16)

So once the public is identified, the agenda decided, the information context defined, and the consulting techniques chosen, the administrator has the opportunity to select how the results of the consultation are to be analyzed and compiled. In either choosing to identify the preponderant opinion through statistical analysis or to identify issues where there appears to be consensus, there are difficulties in interpreting those results as a clear indication of public support.

Recommending decision alternatives

Each of the administrators recognized that their minister, as an elected representative or legislator, was ultimately responsible for the policy decisions resulting from the consultation. For many, this was a straight forward interpretation of democratic accountability:

> In the end, it is a political process and there will be a political judgment as to whether or not the strategy reflects what people think. Apart from reflecting what people think, the strategy must provide leadership and that again is something the government will be evaluated on in the next election. (Bruce 17)

Most were unwilling to accept that "these issues are too important for the politician to deal with", (Glen 17) and that independent bodies might be preferable over elected officials for decision making:

> You can't do that in a democracy. These groups aren't accountable. It's actually calling for the breaking down, taking powers away from the politicians. I don't know if it will work in a parliamentary democracy like we have. The minister still has to have the consultation, build consensus, . . . do all these kind of things. But ultimately the minister has to make these kinds of decisions because . . . he is the only one who is accountable. (Glen 17)

For one administrator, the question of public accountability of legislators ultimately rested on the requirements of fiscal accountability:

> There is a fundamental question of who pays in the final analysis for things. Who is ultimately fiscally responsible? It's always been difficult for governments to say, "Look, we created these autonomous organizations. We fund them every year. They are accountable to the membership, and we should be able to walk away." When has government ever been known to do that? . . . If government is trying to create these arms-length relationships, try to keep them at arms-length, it never seems to work entirely that way. In the final analysis, it always seems to be the minister who is accountable again.(Kent 17)

Thus, there was broad agreement that legislators were ultimately accountable for policy decisions regardless of how and by whom those decisions were made. In response, the consultation processes implemented by administrators were designed to place decision alternatives before the legislators. For most administrators, this means that the legislator should not be directly involved in consultation:

> I think it puts them in a harder position. Often they are involved anyway, but not in a formal way. They are because people will talk to them about it with them. . . . But that's not as formal as having public meetings or going out there and getting feedback or doing surveys. . . . It's more one on one. . . . That's hard for the politicians to do, although they do that all the time. In effect that's their job, public consultation. (Julie 25)

To involve legislators directly in the consultative process tends to constrain their latitude for decision making. As a result, administrators are being requested more frequently to act on their behalf in assessing the public response to possible alternatives. Ministers are more commonly saying to administrators, "Look, I want you to go and dip your toe in the waters before I go, and give me a report back as to what I'm going to find when I get out there." (Peter 23)

> Political people feel that they have to have the answers. And it's too easy for them to get backed into a corner. I have no hesitation about saying, "I don't know, but I'll find out if I can" or "One idea might be to do this, and another one to do that". . . . And that may be as much the fault of the media as it is of anything else, because if you [the minister] say, "I don't

> know", it would be headlines, "Minister Doesn't Know, Should Resign". (Ron 21)

As a result, administrators responded very differently to the involvement of legislators. Some administrators took special care to ensure that legislators were not involved in the consultative process at all:

> We kept ministers a mile away from the whole thing. They never darkened our door. We said we don't want you here. You've got to understand if the politicians get involved in the consultative process itself, you'll skew the results, because they'll be talking to the political process, and won't be talking to one another. You've got to talk to one another. And [the minister] said "That makes sense." He bought that, and stayed away. (Adam 17)

Others took a very different approach, one of including the legislators at all stages in the process:

> Throughout the exercise, I think it's important to recognize that both ministers were extremely interested and concerned with the development of activities in the consultation process. And were party to those workshops. Each time there was a major step in the process, both ministers were in attendance. So not only were they hearing from the advisory group, but they were hearing from Albertans as well, so they had a good feeling for what was going on. (Jim 13)

Still others delayed the involvement of legislators to the final stages:

> You betcha . . . they are going to be involved. . . . Ministers are going to be involved in the next step. They are going to be involved in the public consultations when we go out for validation and modification. . . . We've avoided their participation as long as possible because we don't think it would have been, . . . [the participants] wouldn't have talked to each other the way they would have talked to the politicians. They would have talked to the ears of the politicians. (Adam 36)

Legislators are introduced to the process when it serves the objectives of the consultation. In the following case, the legislator is being introduced into the process to facilitate the final development of consensus on joint strategies. The administrator is seeking to involve the minister in the consensus and to elicit implicit commitments on policy issues:

> Up to now the minister hasn't played a role, but I'm not sure there was a role for him, because we were information collecting and organizing. In the public consultation, [ministers] . . . will be in attendance at each meeting. They will be there as listeners rather than tellers, but the thing that they will do at the end of each meeting, they will come forward and say, "This is what I heard", and they can't at that time say, "This is what I'm going to do about it", because we're talking about the future. . . . He might walk away that very day saying, "You'll hear from me on this, this, this and this, and these are the things I'm going to do about it." The White Paper will be

> the response, the actual firm response. They will be able to give some immediate feedback, and come to a personal understanding of the attitudes and expectations and hope and desires of the people out there, and I think that their intent in coming to these meetings is to deepen their understandings of the vision as it now stands, to actually be there when the final vision is created. (Ann 09)

If the direct involvement of legislators in consultation tends to limit their latitude for decision making, then these approaches demonstrate progressively restrictive efforts to constraint the decision alternatives available to the legislators. This may arise from an attitude that administrators do more than just recommend policy:

> I think that bureaucrats make the policy. It is the politicians that influence it. . . . In terms of running a government, it's the [most senior administrators] . . . who develop and, in fact, set the policy. It's a rubber stamp situation. . . I see it today with our own minister. . . . When we recommend policies to him, . . . he sprinkles a little bit of the political stuff in there to make sure that the political end of it is met, and that's fair ball, and that's kind of how it works. . . . Essentially we decide how we want it to be. (Ed 06)

Another administrator shared the view that consultation was a vehicle which, if structured correctly, could be used to support previously identified administrative initiatives:

> It's obvious in face to face consultation with these people [public participants], that if you think you have the answer, then you promote it. We do the best that we can to get people on our side. It's part of the whole process. Fair enough, they do the same with us. . . . No question, and we did a bit of steering, for example, in the desirability of [a new initiative]. . . . So those kinds of things are part of the consultation process. It may have been more difficult if we had simply announced one day that we were doing this, without ever going to consultation. (Bob 09)

The effect of such manipulation is dependent upon the individuals involved. Another administrator observed that direct participation in a consultation can have very different results:

> So if you get some of that occurring with a minister that has very narrow perspectives, what would your public consultation mean? Probably not much. But on the other hand, if you are really doing objective work, and you have a minister with an open mind, probably public consultation would become very important. And it really does shape reality. (Gord 39)

Manipulation by the administration may be an indication of a rift between the administration and the legislators:

> I think it is very fair for politicians to be skeptical of the bureaucracy. I think it is very fair for them to talk to their constituents and get some

> independent advice. We in the bureaucracy deliver programs and do things in a certain way and we've done them for a long time and you don't like to change. Or you don't like the really radical change. And I think that it's fair to be a bit skeptical of what you might get from the bureaucracy. (Julie 26)

Rather than a source of information and considered advice, it is the view of this administrator that because of the manipulation of the decision making process, legislators tend to see the administration as yet another interest group:

> There is a distrust of the bureaucracy and I can appreciate, on the other side, the bureaucrats have been a little lazy and more self-seeking as time has gone on because empires have been built with this government so that bureaucracy has about reached its maximum and is now shrinking. People are fighting for what they've got. The politicians don't have a reliable base of information or a base of expertise upon which they can rely for advice that is knowledge-based and not self-seeking. So the bureaucracy is perceived by the politician as being just another special interest group. (Ed 19)

The involvement of the legislator in the consultation process is extremely important to the outcome. The administrators in this study accepted that it was the legislator who was ultimately accountable for the outcomes of the consultation process. As a result, they have very different approaches as to how and when the legislator should be involved in the consultative process. Some administrators sought a process which placed options before the legislators, supported by information derived from the consultation. Others were more interested in making legislators a part of the consultation in order that they could then become advocates for the recommendations arising from the consultation. Still others sought to limit the range of possible decisions by constraining the actions of the legislator through manipulation of the process.

Summary

Public consultation is an episode in policy making in which the process becomes external to the normal policy making activities conducted within the organization. While the actual consultation is externalized, the design, execution and determination of outcomes are conducted within the organization and subject to the demands of a bureaucratic administration. Thus, the process remains within the control of the administration even though it runs external to the organization. As a result, administrators are in a position to place bounds on the range of possible outcomes of the consultation through the timing of the consultation in the policy process, selection of public participants, setting the agenda,

establishing the information base, choosing the consulting techniques, analyzing and compiling the results, and recommending decision alternatives.

Administrators' Understandings of Relationships and Policy

Interviews with participants were concluded with a discussion of the outcomes of the consultation and of the contribution that it made for the state of the policy at the time. These conversations invariably revolved around the relationship between the policy and those who participated in the consultation. The emerging themes reflected two fundamental orientations held by administrators: first, that the quality of the organization's relationships with its public was dependent upon the policies resulting from the consultation or, second, that the quality of policy outcomes of the consultation was dependent upon the organization's relationships with its public.

Relationships with the public as dependent upon policy outcomes

One group of administrators in this study took as its orientation, that the quality of relations with the public at the conclusion of the consultation was the result of the policy outcomes emerging from the consultation process. As one administrator indicated, "If the government responds in a way that does not reflect the options identified and the input received, then I think it will be a bit awkward." (Bruce 33) From this person's point of view, the consultation offered a reconciliation of contending positions which was acceptable to the consultation participants:

> I think politically the results are certainly going to have to be respected. I don't necessarily see a problem in doing that and it still doesn't mean that there aren't tough choices going to be made. And that is part of the dilemma, because whenever, you get involved in making choices there are things that are going to fall off the table and there are groups that feel that they are being hard done by. For a lot of the issues that are out there, there aren't any painless solutions. But I think there is a general recognition that the issues have to be dealt with and it's just what the tradeoffs are and what balances are going to be achieved in making these decisions. (Bruce 28)

A second administrator viewed the consultation process as one in which continuing feedback on the developing policy would result in continuing support for the process and the policy:

> Maybe you could say it cemented relationships, particularly since the committee responded to representations that were made to it. It was obvious that if something came in saying, "This was off track", the next draft reflected something getting closer to the track. So they knew that their comments were being considered by the committee . (Ron 14)

A relatively common theme among this group of administrators was that continuous visible feedback was required to maintain the support of participants. "One of the problems, the double edged sword of consultation, is that you've got to be prepared to do something or at least explain to people in very precise terms why you are not going to do something."(Kent 07)

The basis of this approach arose from two sources. The first was an avoidance of alienating the public or damaging existing relationships through the consultation:

> You've got to have a strong commitment that, in fact, this is a real process, that this isn't simply going out and collecting the views of people and "Thank you very much. We will do what we wanted to do in the first place." So I think there has to be a commitment to the process and not simply the appearance of the process. That's absolutely critical. (Bruce 31)

The relationship can be damaged by a continuing lack of response to numerous consultations on the same topic:

> Publicly, the commitment was made to act on the public process and the results of that process, . . . [but] to a certain degree, the commitments that were provided to them were [unfulfilled]. "Government won't listen to us anymore. You asked us to give you this input and we give it to you, and you don't act on it. Now you come back . . . and ask us the same questions, and we know that you're not going to act on it.". . . If that happens enough without a concrete response that people can make connections between "our input - their response", a number of different things can happen. They lose faith in the whole process in the whole process of public participation. They lose faith in the government itself, which is more likely the case before they lose faith in the process of public participation. (Art 05)

For another administrator, the relationship was damaged by a lack of sincerity in responding to the results of the consultation:

> Personally, I think we should pay more attention to the results of the consultation. . . . There's a lot of stakeholder groups, . . . they're not idiots. They know when they are being fleeced. . . . You invite them through the doors and you pat them on the back, "Thank you for all your input", and then you go back and into your office and basically toss it in the garbage, and I don't think that's going to work, that can't happen time and time again, because people won't take that. . . . I've seen some letter writing to the minister saying, "This is a farce" or whatever, or making people just generally aware that these consultations are not what they are cracked up to be. But there are quite a number of routes they could take in terms of getting the message out that consultations aren't what they supposed to be. (Jan 12)

However, public consultation often creates expectations which cannot be met.

> If you appear too open, if you are not honest up front about your ability to react, about the restrictions that are on you, it can build expectations that you cannot satisfy. (Bob 14)

For those who are concerned about the possibility of damaging relationships as a result of consultation, the advice of one administrator was simple, "Don't start it if you don't mean to listen to it." (Ron 25)

The second basis for the orientation toward the dependence of relationships on policy outcomes emerged from a belief that those affected by policy decisions should have some influence over the nature of those policies. This approach was best articulated by one administrator who insisted that administrators should "Listen to what people are saying, hear what they are saying. Don't be afraid to involve people in developing policies that are going to affect them. They are the ones that are going to have to live with that policy much longer than the person that made it." (Peter 21)

> It's serious feedback that we want, and it's serious feedback that we get, not treating it lightly or capriciously at all. Because of our role, the advocacy role if you like, we think very strongly in this department, that it is our responsibility to consult with those that are affected by our decisions, and invite their participation in shaping those decisions. There is little point in sitting in an isolated chamber and make decisions that make sense to one group close to those who are making those decisions, only to find that the thing plops as soon as it gets out there because certain practical matters or certain things that weren't privy to or even aware of, made it incompatible with the reality that was out there. (Peter 06)

The purpose of involving those affected by the decision is to develop ownership in the decision:

> Part of the role of a public service person is to analyze what comes back in the way of what interest groups want, and see how you can maximize the benefits to all rather than minimize the dissatisfaction. And if you can do that, then you end up with that thing that I called earlier "ownership". Because then they each have something that reflects part of them and they have to make it work, or politically or ethically, they have a problem down the road. (Peter 16)

Approaching one's relationship with the public as being dependent upon the policies emerging from the consultation process is one which is consistent with a "top-down" decision structure. There is an underlying belief that if the appropriate policy is adopted, then there will be a greater likelihood of acceptance by the public and a lesser likelihood of alienation. This "top-down" approach is tempered by the belief that policy decisions are

more likely to be successful if they are based upon the input gained through an effective public consultation process.

Policy outcomes as dependent upon relationships with the public

Another orientation evident among the administrators participating in this study was that the quality of policy outcomes resulting from the consultation were dependent upon the organization's relationships with its public. This represented a substantial departure from the traditional "top-down" policy orientation of government. "I think the people are looking for a different kind of relationship with government, and a different sort of relationship with all stakeholders. I think that is one of the expectations that the people have throughout the whole process." (Bruce 24) The basis of this approach was more consistent with "bottom-up" policy design which placed more confidence in the capabilities of public participants and which established a more collaborative approach to policy development to ensure:

> that there is a solid relationship between the consultation and the audience, that the consultation process that's designed has an understanding of the audience, that it is attempting to engage in a dialogue around an issue. (Mary 12)

This administrator used the metaphor of the conversation to typify meaningful consultation:

> Just as if you and I have a conversation, and I try and listen to you, even if I can't agree with you, it doesn't mean that we should stop talking. . . . It means that I hopefully had another way to look at something, and it'll influence me at some point, and you have a better understanding of what I'm dealing with. It's not because I've talked to you, and you've given me this input that I'm in a position to do what you like. (Mary 10)

A common concern among administrators was the generation of public expectations which could not be fulfilled. However, this administrator felt that those expectations could be moderated through less structure in the linkage between public input and policy:

> I think that people think that . . . government makes implicit commitments when they go out and consult. I think that when government goes out and consults, they are saying sincerely that they would like to hear from people on a range of issues. . . . Ya, I think people get somewhat disappointed and make that implicit, assume an implicit commitment that "if you asked me, and heard me, that you will do what I asked you to do." I think that is a logical connection, but I don't think it's the way it can always work. (Mary 09) Because there is not always a linear connection across the page on that process. . . . It's possible . . . to make it really clear that it is the minister that makes the decision. And when we hear your input, we appreciate your input, we listen to it, we need to understand it, but we are

> not always in a position to make the decision that is directly like that input that you gave. (Mary 10)

From the point of view of the administrator, the challenge was to develop a relationship with the consulting public in which there was a meaningful exchange of information to support the on-going policy development process:

> I think that consultation is a relationship. It's a relationship around information and information is not static. And I think that public policy making is becoming less static as well internally and in relation to public input. I think that civil servants, over the last 20 years that I can think back on, are different too. Not that there aren't still what people might perceive as traditional civil servants, but I think people, because we are all changing as individuals and society is changing, I think people are more open, more inclined to have a conversation, more inclined to explore ideas, more inclined to be flexible in mind, not to be so linear in one's relationship with information. And maybe if through public consultation processes, it can become more open more fluid, but it won't become more open and fluid if in a consultation process one has those assumptions translated into "I said, therefore you will". I think that would be an unfortunate outcome. (Mary 11)

Policy making which was based upon a relationship with the public was for these administrators a continuous process:

> Once you get people to buy into something in the sense that they are participants and that they are really part of the journey, then it is very hard to turn that back. . . . I think their expectations are that they will continue to be a full partner in the development of the strategy and they will be full partners in how its implemented. (Bruce 22)

For these administrators, there was a recognition that the changing policy environment required continuing consultation:

> Any strategy today really has to have the ability to renew itself continually. That is something . . . that would have to be a part of whatever the end result would be. So I don't expect that we are going to have a document that would say that until the year 2000, this is the strategy. That would be a horrendous mistake, because in two years this will be almost irrelevant. There has to be a way that this thing can continue to renew itself. (Bruce 36)

Not only was continuing public consultation necessary for policy making, it was a demand which grew from the consultation. As one administrator indicated, "I can't imagine this department being able to sponsor any legislation in the future without going through this kind of process." (Ron 13) Another confirmed this to be a positive outcome of the process:

> It may be the most gratifying thing I've heard yet. They have said to us, "It doesn't stop here. Once you've let us in, you can't keep us out." I like that, it's really really good. (Adam 31)

For some administrators, the consultation process was not only part of the policy making process, but also the beginning of the successful implementation of policy:

> One of the things that is very important that has come from the process, is that apart from wanting to be involved in the development of strategy, it is very clear that most stakeholder groups also recognize that they must be part of the implementation. And this is something that is quite new for Alberta at least. . . . So consequently what we are looking at is really through the development and implementation of the strategy. We want a process where essentially the is ownership that is shared with all of the major stakeholder groups. . . . So the strategy in that sense will not be a prescriptive document on the role of government. It will be a prescriptive document on the role of all stakeholders. (Bruce 04)

For this administrator, the consultation was an opportunity to develop relationships among the public participants that would enable them to resolve their own future problems:

> All of a sudden you start to gore somebody else's bull. Everybody's ox is going to get gored. Then it's going to be a little more difficult, but with the trust that's built up, god, I hope the trust has been built, will carry us through, will carry us far enough through the tough stage to leave some successes. . . . We developed a process that we believe will allow them to build, to gain that trust among themselves. . . . Now it's up to them to keep that trust going, it's up to them to maintain enough objectivity among themselves to understand that none of them will, none of the future will be served by continuing the kind of bickering that had gone on. (Adam 32)

Evolving attitudes

There is a substantially different attitude represented by administrators who hold the orientation that relationships are dependent upon policy and those who believe that policy is dependent upon relationships. The first represents the traditional "top-down" orientation to policy making and is motivated by a desire to build public support, if not to avoid alienating existing support. The second represents a greater faith in the capacity of the public to participate in policy making and a recognition that policy will be more easily implemented if relationships, ownership and structures of support are put into place during the policy development process. These latter attitudes are not as common as the former among the administrators in this study. However, as the administrator who articulated this orientation so well noted:

> I think our behaviors are changing. . . . I think we are all less strict and defined about our respective responsibilities. I don't know whether the

> issue of people not knowing what the roles are is really a problem. I think we're all maturing as individuals, and that people are somewhat easier with things and that demarcation around the question of roles isn't as critical. I think people are really integrating the meaning of partnership and advancing that meaning of partnership. I think it's very good. I think that public policy is enhanced through understanding the impact of decisions on people and having people articulate with their emotions (Mary 02)

The problem for some administrators is that their ministers were not supportive of such approaches. However, attitudes are in flux here too:

> That may or may not have been the case before. I don't think it is the case today. I think that there is a growing trend at the political level that if they are endorsing these kinds of activities within government, they have to be prepared to accept the outcome. (Jim 19)

Contemporary Models of Public Consultation

There must be a purpose to consulting with the public in the formulation of public policy. If there is a purpose to be served, there must also be principles which have been identified as contributing to achieving those purposes. The administrators in this study entered into consultative processes for a variety of purposes serving the advancement of the policy process. However, concerns were expressed that in serving the specific shorter term objectives of the policy process, the longer term implementation of policy may have been jeopardized. The remaining themes which emerge from the experiences of administrators in this study are concerned with, first, the methods which administrators use to place limits on the range of possible outcomes of the consultation and, second, the dependency association between building constructive relationships and building good public policy.

There is a wide range of purposes which can be served by involving the public in the formulation of public policy. There are, of course, the sweeping exhortations to generate a more participatory democracy in which citizens play a continuing and integral role in self-governance. These result from a broad understanding of the nature of democratic government based upon beliefs that the legitimacy of government action derives from the consent of the governed or from a "moral recognition that those affected by a decision should have input into that decision" (Smith, 1984, p. 253). Others see enhanced participation as a necessary component for the continued evolution of democratic society. Barber (1984) uses the term "strong democracy" to define a condition in which

> conflict is resolved in the absence of an independent ground through a participatory process of ongoing, proximate self-legislation and the creation of a political community capable of transforming dependent, private

> individuals into free citizens and partial and private interests into public goods. (Barber, p. 132)

However, de Leon (1992) is dubious of the pursuit of ambitious and perhaps unattainable goals of a more participatory democracy and so he suggests instead the more achievable objective of the democratization of policy analysis.

> The concept of a democratized policy analysis is relatively straightforward. Instead of involving every citizen in decisionmaking . . ., the idea is to increase citizen participation in the articulation and formulation of public policy programs. Rather than having the many engage in the actual policy decision (as one finds in strong democracy), it asks that policy analysts devise and actively practice ways to recruit and include citizens' personal, conscious effort to translate and aggregate with fidelity *individual* preferences into *public* policy. . . . The underlying assumption is that people will have more confidence in a policy in whose development they were consulted, although the final policy does not agree with their particular preference. (de Leon, p. 127, italics in original)

Thus, de Leon's democratized policy analysis calls upon administrators and policy makers to create incentives and forums for the expression of public preferences, and to provide some assurance that these "will not be shams, i.e., that the information gathered will be an important component of policy formulation, and that the information will not be manipulated or restricted" (de Leon, p. 128). While, there is a wide range of alternative possibilities for citizen involvement which have been identified by writers on public participation, not all of them meet de Leon's demands for assurance.

Typologies of Citizen Participation

Public participation activities have been grouped in a number of ways to illustrate their relative contribution to the formulation of policy. Wengert (1976) takes a pragmatic approach in which he outlines a series of perceptions of citizen participation which are tied to the motivation of those calling for participation. Individuals' motivations are dependent upon whether they are in power or out of power; their position, status and responsibilities; their constituencies; and their overt and covert goals (Wengert, p. 25). He typifies these perceptions as (a) participation-as-policy, in which citizen involvement is simply a matter of democratic rights to be implemented in as many ways as possible; (b) participation-as-strategy, a maneuver to accomplish stated or unstated goals either motivated from outside the system toward revolutionary shifts in power relationships, embodied in the phrase "Power to the People", or from inside the system, as a technique for gaining legislative and political support and legitimization; (c) participation-as-communication, improving information inputs into administrative decisions; (d) participation-as-conflict resolution,

reducing tensions by sharing points of view and thus increasing understanding and tolerance; and (e) participation-as-therapy, or the use of citizen involvement as a vehicle to reduce the alienation of underclasses from society (Wengert, pp. 25-27).

Wengert's typology represents a fragmented view of citizen involvement in which each perspective has little relation to any other. However, various other authors have developed typologies of participation utilizing unique dimensions as the primary organizing concept of the typology. Undoubtedly the most frequently cited is that constructed by Arnstein (1969), who developed one of the earliest of the many "ladders" of citizen participation, illustrated in Figure 3.

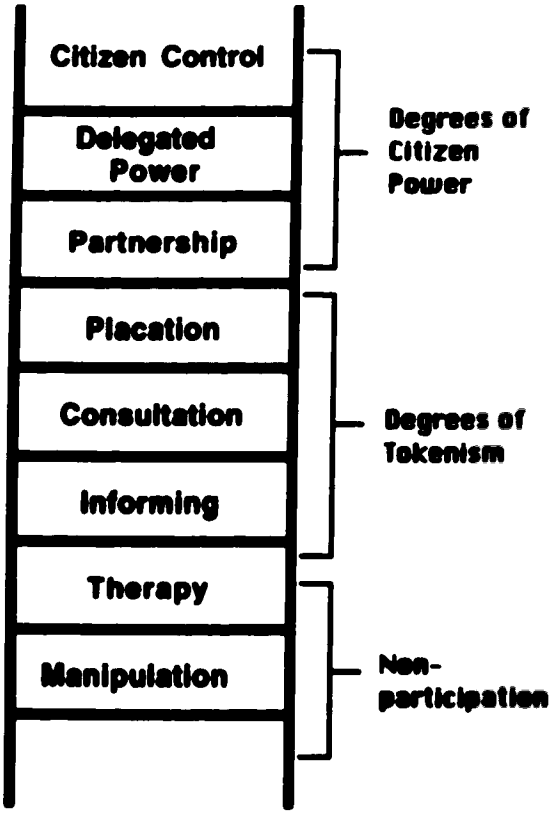

Figure 3 - Arnstein's Ladder of Citizen Participation

Arnstein contends that participation must involve a redistribution of power.

> Participation without redistribution of power is an empty and frustrating process for the powerless. It allows the power-holders to claim that all sides were considered, but makes it possible for only some of those sides to benefit. It maintains the status quo. (Arnstein, p. 216)

Arnstein's ladder juxtaposes powerless citizens with the powerful in order to highlight the fundamental divisions between them. Connor (1988) uses a different dimension by attempting to view participation as a vehicle for the resolution or prevention of conflict. Connor observed that Arnstein's ladder did not provide for any progression from one level to another, and so Connor proposed another typology which offered a systematic approach to preventing and resolving public controversy through progressive, related forms of citizen participation (Connor, p. 250). His ladder, shown in Figure 4, separates leader-oriented activities of joint planning, mediation, and litigation from activities oriented toward the general public such as education, information/feedback, and consultation. Connor suggests that while successful programs

at any level contribute to resolution or prevention, if programs for the general public fail, decision-making reverts to the elites and different forms of participation are required.

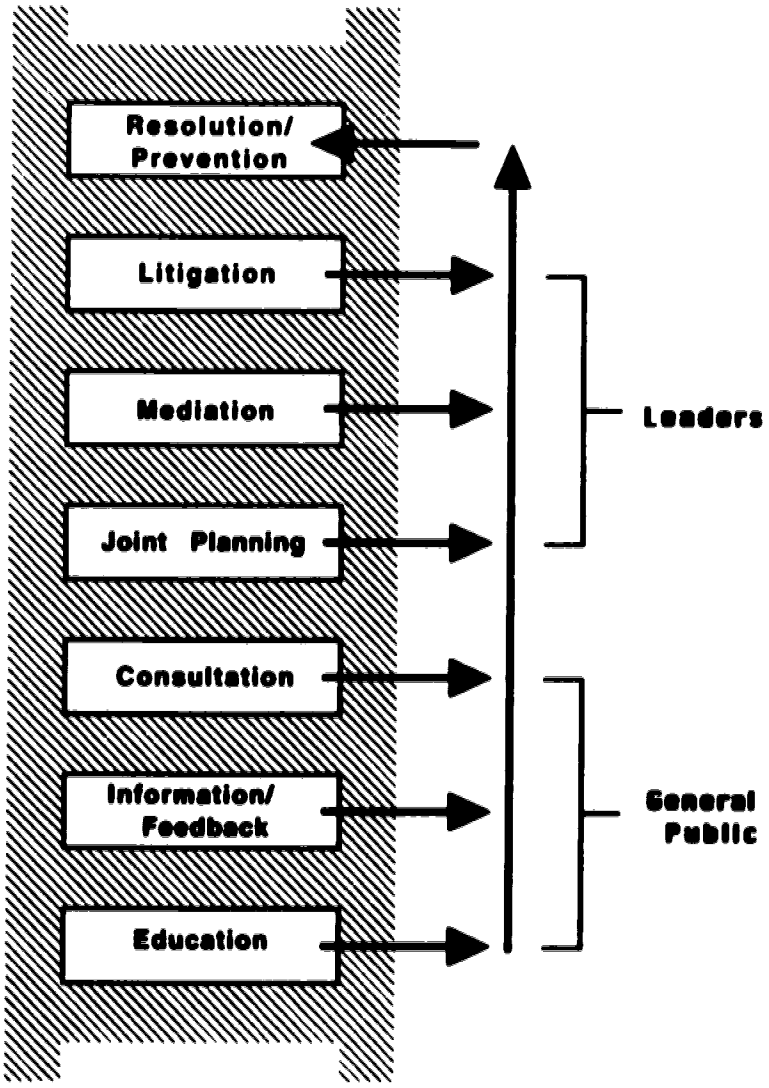

Figure 4 - Connor's Ladder of Citizen Participation

Potapchuk (1991) attempted to blend the work of Arnstein and Connor into a typology which would better reflect the type of broad based participation which requires the support of communities, community elites, and government for major community initiatives (Potapchuk, p. 161). Potapchuk's ladder in Figure 5 outlines levels of shared decision making and captures "the essence of power - who decides and who supports the outcome" (p. 163).

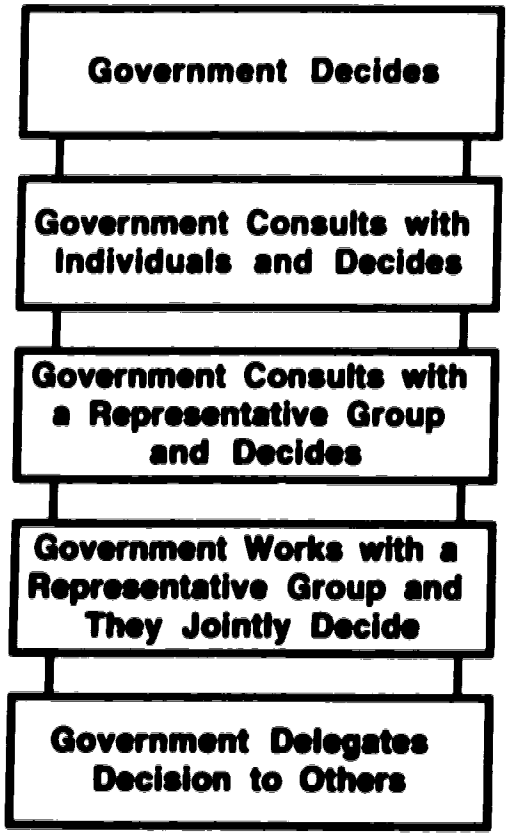

Figure 5 - Potapchuk's Ladder of Citizen Participation

Potapchuk's ladder is reminiscent of another typology of citizen participation shown in Figure 6. This ladder, constructed by Chess, Hance, and Sandman (1988), reflects the continuum of power distribution of Potapchuk, combined with some of the activities outlined by Connor as well as the power re-distribution possibilities called for by Arnstein.

The common core to all these ladders is that the activity of consultation is consistently at the mid-point in the continuum, at the juncture between the shifting of power from government to the public on the one extreme, and the manipulation of the public to achieve the predetermined objectives on the other. Chess, Hance and Sandman's separation of consultation into two forms, one genuine and the other an empty gesture, makes clear that public consultation can be structured to lean in either direction. Connor also places consultation firmly between public education and information/feedback approaches which convey fixed one-way flows of information and joint planning in which power is shared, if only because of jurisdictional authority (Connor, 1988, p. 253-54). Consultation for Connor is an advisory process in which additional solutions and criteria for evaluating solutions must be sought from the public to augment the information available to policy makers, but the authority to decide remains with government. Similarly, Potapchuk views consultation as the middle position between the unilateral decision of government and the complete delegation of decision making power to others.

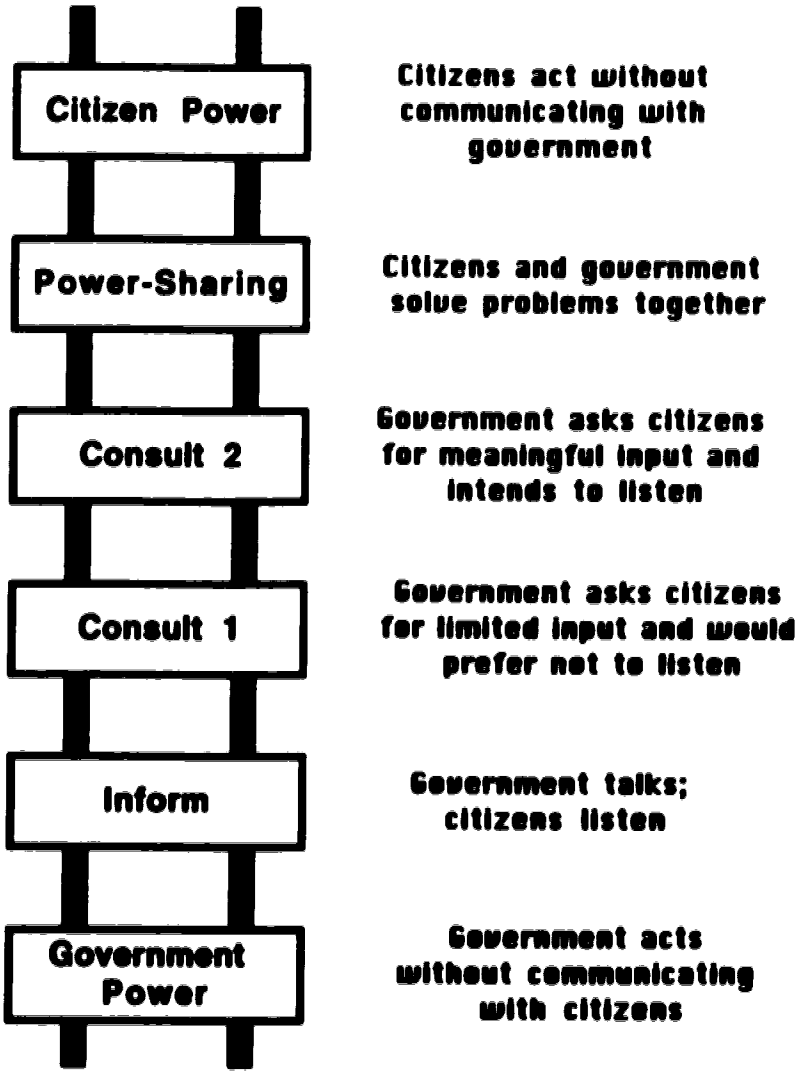

Figure 6 - Chess, Hance and Sandman's Ladder of Citizen Participation

Again, after consultation with either individuals or representative groups, government decides. Arnstein, taking a more cynical view, also sees consultation at the mid-point between manipulation and citizen control, but still considers it to be merely tokenism.

> Inviting citizens' opinions, like informing them, can be a legitimate step toward their full participation. But if consulting them is not combined with other modes of participation, this rung of the ladder is still a sham since it offers no assurance that citizen concerns and ideas will be taken into account. . . .
>
> When powerholders restrict the input of citizens' ideas solely to this level, participation remains just a window-dressing ritual. People are primarily perceived as statistical abstractions, and participation is measured by how many come to meetings, take brochures home, or answer a questionnaire. What citizens achieve in all this activity is that they have 'participated in participation.' And what powerholders achieve is the evidence that they

> have gone through the required motions of involving 'those people'. (Arnstein, 1969, p. 219)

In structuring consultation, administrators walk a razor's edge between genuine power sharing and manipulation. Consultation is not the only way to involve the public in policy making, nor is it the best way. There is a great deal more that can be done to involve people in the decisions that affect them than only to consult. Consultation is not in itself a substantial contribution to the democratization of policy analysis or to the construction of a more participatory democracy. On the other hand, public consultation provides a greater degree of involvement than the one-way flow of information used in public education programs, and it is vastly superior to autocratic rule or overt manipulation. As such, administrators have considerable latitude in structuring consultation to achieve any number of purposes. At issue are the principles which distinguish one consultation which is a genuine effort to engage the public in the making of public policy in a constructive manner from another which is manipulative, and structured only to achieve unstated goals.

The Principles of Constructive Public Consultation

The administrators in this study exercised considerable influence over the outcomes of the consultation through the design and execution of the process. By choosing the timing of the consultation in the policy process, selecting public participants, setting the agenda, establishing the information base, choosing the consulting techniques, compiling and analyzing the results, and recommending decision alternatives, administrators are in a position to place limits on the possible range of outcomes of consultation, and to ensure that they fall within limits acceptable to those to whom they are primarily accountable. In each case, the explicit and implicit selection of design features had a considerable influence over the course and outcome of the consultation.

The issues which are raised by these bounding techniques are not those of contravening the principles for conducting a consultation correctly, although there are many manuals on the subject which give that impression (e.g., PAO, 1992). They are issues of fairness. As Lane (1986, p. 385) indicates, the perception of fairness is a complex concept, composed of a number of inter-related components. For Lane, perceptions of fairness are based on perceptions of who is making the decision, by what criteria, through what procedures and with what outcomes.

Who Decides: Selecting public participants

There are three basic positions which various authors take as to who should participate in public consultations. The first, articulated best by Benveniste (1989), is that participation should be held to a minimum because policy planning "cannot afford to be dominated by participatory processes" (p. 45). Participation, particularly formal or mandated involvement, is to be avoided because of the resources required, because it is "too demanding on participants" (p. 46), and because it requires complete openness and disclosure which Benveniste argues is counter-productive to successful implementation of policy (p. 48). Participation from this point of view is limited exclusively to those who can be co-opted into supporting the implementation of the plan.

The second position is that criteria can be set for determining the people who should participate. Possibly the most well known advocates of this position are Vroom and Yetton (1973) who set criteria for participation by posing a series of questions, the answers to which dictate the process for making a decision and the degree of involvement. Vroom and Yetton proposed their theory for application to small group decision making in organizational settings. However, Thomas (1990) adapted their concepts to issues of public involvement, and he proposes a decision tree based on similar questions regarding the quality requirements of the decision, whether the decision maker has sufficient information, the degree to which the problem is structured, whether public acceptance of the decision is critical to implementation, whether public acceptance is possible if the decision is made without consultation, the degree of consistency between agency goals and public values, and the likelihood of conflict over the solution (Thomas, p. 442). From these, Thomas' decision tree provides an indication of the most appropriate approach to public involvement ranging from an autonomous managerial decision, through public consultation of various forms, to a joint public decision (p. 437), a typology very reminiscent of Potapchuk's Ladder.

Another approach to setting criteria for the selection of participants is proposed by Bridges (1967) who suggests that if a decision is to be made which falls within an individual's zone of acceptance, then participation will not be effective and, therefore, will not be required. However, if a decision is to be made which lies outside of a person's zone of acceptance, then participation will be more effective, and it will be required. The degree and form of participation in the decision is determined by two tests. The first is that of relevance, that is, whether the individual has a stake in the decision. The second is the test of expertise, or the extent to which the individual is qualified to make a useful contribution to the

identification or solution of the problem. (Bridges, as cited by Hoy & Miskel, 1991, p. 324). On the basis of these tests, Bridges' model indicates the frequency and extent of involvement, the stage in the decision process at which involvement will be most effective, the type of decision process, and the role of the administrator in making the decision (p. 333). The reasoning behind the more structured approaches of Thomas and Bridges is the pursuit of efficiency in decision making, avoiding what Thomas (p. 443) describes as the "excess of democracy" which threatens governmental effectiveness.

The third position is that of open public involvement based upon the belief that there should be ample opportunities for individuals to be involved in the decisions that affect them. This is the preponderant position of the practitioners of public participation. This position is motivated by two perspectives. The first suggests that people differ considerably in their awareness of a policy problem, the perceived constraints on affecting the problem, and the extent to which they will become involved in its resolution (Grunig & Hunt, 1984, p. 147). As the decision making process moves in the direction of having a greater direct effect on individuals, the relative magnitude of perceived constraints declines, and these individuals tend to become more involved. Because it is difficult to determine awareness levels and perceptions of constraints, it is difficult to set accurate criteria for the selection of individuals to be involved. Therefore, one runs the risk of excluding concerned participants (Bleiker, 1978, p. III-5). This raises the second perspective which suggests that if the concerns of as wide a proportion of the public as possible are not met from the outset, the policy maker may still be forced to attend to them later in the process. Dealing with the public after they are angered or alienated becomes a far more difficult situation (Chess, Hance & Sandman, 1988, p. 5).

Consistent with this position of open participation, Creighton (1981) proposes operating principles in order to avoid the danger that policy will be made by small elites and thus it will be seen to be unfair to other affected parties. He recommends that every public involvement program should have the following obligations to the general public:

1. The entire public must be informed of the consequences of a proposed action so that citizens can choose whether or not to participate.

2. Highly visible ways of participating must be made available so that people know how to participate if they want to.

3. All interests publics must be represented among the participants. . . .

4. Equal access to information and to decision makers must be provided to all interests. (Creighton, p.45)

Criteria: Setting the agenda and the information base

The pursuit of the principle of fairness in setting the criteria for decisions made on the basis of public consultation leads to a consistent view that the public is entitled to know in precise and operational terms what those criteria are to be. The agenda should be clear.

> Policy development/problem solving consultation should only take place on things where there is room to move. There must at the outset be a clear statement of the issue to be addressed; of the objective(s) of the consultation; and of the constraints, if any. If it is necessary for prior constraints to be identified or policy guidance to be given, this should be clearly set forth and recognized by all participant in advance. (Niagara, 1989, p. 27)

Similarly, Creighton recommends that the precise ability of agency personnel to act upon the agenda should be made explicit to ensure that public expectations are realistic.

> The public often has unrealistic expectation of the decision-making authority within an agency. In particular, people are likely to be confused by the division of authority among agencies. Also, the person conducting the public involvement program is frequently not the decision maker, in which case public involvement results in a recommendation to the decision maker. It is extremely important that limits on authority and mandates shared with other agencies are identified from the beginning with the public. (Creighton, 1981, p. 32)

Being clear about the agenda, however, does not mean being unfairly restrictive. As Bleiker (1978) observes, "It is dangerous - and not very realistic - for an agency to define the issues, the options, etc. more narrowly that the public perceives them" (p. III-12). The public should have a role in setting the terms of the consultation and the scope of the process.

> The agenda and process of the consultation should be flexible. The issues, objectives and constraints should be established at the outset. A clear, mutual understanding of the purpose and expectations of all parties to the consultation is essential. However, flexibility must be built into the process to allow for changing views and new facts. (Alberta, Personnel Administration Office, 1993, p. 10)

Unfairly constraining the process creates considerable risk of jeopardizing the legitimacy of the process. However, the greatest potential for destroying credibility is through the subtle manipulation of the information base. Bleiker observes that public officials and professionals tend to believe that they understand the problem, that they have identified the

available options, and that they know the consequences or impacts that are associated with each of the available options, but that the public does not.

> This kind of attitude on the part of a professional does not only become a significant CP [Citizen Participation] issue, it becomes a CP problem, if that professional concluded that, because he has a better understanding of the problem, etc. lay citizens have nothing to contribute, i.e. that CP has nothing to contribute to his problem-solving effort. (Bleiker, 1978, p. III-8)

Similarly, Creighton suggests that professional attitudes can be unreasonably negative. Because of the lack of understanding in the public of the labyrinth of government, it is easy for professionals to discount public recommendations as unworkable in the current system. While he suggests that professionals should work with the public to remove these institutional obstacles to reasonable solutions (Creighton, 1981, p. 31), he emphasizes there is a tendency to take this lack of knowledge as ignorance of the issues. However, Bleiker points out that to embark on a public education program is not the solution.

> '*Educating* the public' is a fast and effective way for getting your agency and your project in trouble .... It probably could not help but give the impression that the professionals feel they know what's good for the community and, therefore, are going to start educating the community. (Bleiker, 1978, p. III-12, italics in original)

Creighton supports this observation.

> The agency is in a selling posture; it believes that it knows the best solution for the situation and is using public involvement to push for its own point of view. This will usually accomplish two things. First, the public will consider the public involvement program nothing more than a new-fangled approach to the agency's doing what it wants to do anyway. Second, agency personnel will become defensive as they find themselves obliged to defend the agency's proposal, the agency's integrity, the sincerity of the public involvement effort and so on. (Creighton, 1981, p. 30)

There is a balance to be achieved between providing adequate information and attempting to structure the issues unfairly. Public consultation should not be considered to be a public education program. However, all parties must have reasonable access to all relevant information. A decision to withhold relevant information could be perceived by the public as being secretive, and this obviously will have a negative impact on the outcome of the consultation (Niagara, 1989, p. 28). More damaging to the credibility of the project, however, is that if all of the information that is relevant to a project is not made available, the public learns to rely on other sources for project related information and to trust others. (Bleiker, 1978, p. III-13)

Procedures: Choosing the consulting techniques and recommending alternatives

The essence of procedural fairness is that the process should be credible. The process must encourage the building of trust among the decision makers and stakeholders by clarifying values, building a common database that has mutual agreement on its accuracy and representativeness, developing norms for cooperation, and applying these to specific problems (Niagara, 1989, p. 29). These are not simple tasks and they each require specific attention. However, Creighton suggests that this necessitates a common approach.

> You may know that in reaching the final decision all points of view were carefully considered, but if not documented, people may suspect that the decision was made in a smoke-filled room somewhere. The only way to establish the credibility of your program is to make sure that everything you do is visible. (Creighton, 1981, p. 29)

One view of a credible process is that all decisions should be made through consensus, rather than as a result of the voting process. All stakeholders should have an equal opportunity to present their views and to be heard in the context of the consensus building process (Niagara, 1989, p. 29). Once consensus is achieved, it must be respected.

> It must be recognized that any consensus reached by this process involves compromise and flexibility from all participants and thereby interlinks the issues to form an overall consensus. The overall consensus, therefore, must be regarded as an entity. Any unilateral change to the implementation of the consensus would require a re-evaluation by all the affected stakeholders. (Niagara, p. 29)

However, this assumes an optimistic stance on the ability of contending interests to come to a workable consensus, particularly one which has the character of an overall consensus. Another view recognizes that

> the process of choosing the 'best' alternative from among several is, essentially, a political process - or at least a pseudo-political process - because it usually involves making trade-offs. Therefore, a choice that involves big or agonizing trade-offs has to be left to the political process. (Bleiker, 1978, p III-4)

Therefore, from this perspective, a credible process need not conclude with a decision, particularly one which is binding on all parties. A credible process requires only that all perspectives be respected and given consideration in the final decision.

Outcomes: Products versus Relationships

There is a theme which runs throughout this discussion of perceptions of fairness in public consultation. There is a bias on the part of these commentators toward the requirement to attend to positive relationships rather than to the pursuit of policy products. As Potapchuk (1991) observes, "Satisfaction with decision comes from not only liking the solution, but from believing that your views were heard and respected and concluding that the process was fair and appropriate" (p. 160).

Each of these commentators strongly emphasizes the importance of developing and maintaining good relationships with the public as the primary, and sometimes the only, objective in constructive consultation. The Niagara Institute, for example, a leading Canadian trainer in consultation methods, identifies the selection of critical relationships as the key to planning a consultation process. Having identified these critical relationships, the next steps are to identify why this relationship is important and what is required from the relationship, and then to select techniques, methods and processes to work within these relationships (Niagara, 1989, p. 9). Thus, the Niagara Institute takes as its base position that public participation is "an act of relationship building" (p. 10).

> The consultation process should be viewed as ongoing, as tangible evidence of the mutuality and interdependence of stakeholder interests. (Niagara, p. 28)

The course material for training given to administrators by the Government of Alberta takes a similar perspective.

> Public consultation goes beyond simply informing people to actually involving them in decisions which affect their lives. Consultation is about partnership. It is essential to let people know about, and contribute to, decisions which affect their lives and the communities they live in. It implies a shared responsibility and ownership of the process and the outcome. (Alberta Personnel Administration Office, 1993, p. 9)

The goals of constructive consultation are, according to Creighton, credibility, identifying public concerns and values, and developing consensus (p. 12).

> To the extent that an agency's public involvement activities attain these goals, they not only provide a base of support and legitimacy to the agency's program based upon the public's desires, they also serve a broader social purpose in a democracy by assisting in developing a new social consensus that takes into account the concerns of all interest groups. (Creighton, 1981, p. 12)

However, some of the administrators participating in this study were seeking different goals than the establishment of a credible process. The primary objective of the bounding techniques employed by these administrators in the consultations in which they were involved was to obtain outcomes which were acceptable to those to whom the administrator felt most accountable. According to Chess, Hance and Sandman, this is not unusual. "Agencies too often focus on the scientific data and ignore the outrage factors. They pay the price for doing so." (p. 5) The price which administrators pay is the resistance they face in a public outraged by the fact that they are expected to incur a variety of risks without being consulted on how they view those risks. While technical experts may be able to establish levels of risk on the basis of scientific data, for the lay public, risk assessment is a matter of perception and personal values. Chess, Hance and Sandman therefore suggest that consultation

> focus on building trust as well as generating good scientific data. . . . People's risk judgments are seldom based solely on scientific information, but rather on a combination of the data, their perception of the risk due to other variables and their feelings about the agency. (p. 8)

They encourage those conducting consultations to emphasize values over scientific data.

> Be prepared to give people's concerns as much emphasis as the numbers. Give as much consideration as possible to community concerns and feelings. Many people make their decision based on their feelings, their perception of the agency, their sense of justice, etc.. Numbers alone will rarely sway them. (p. 23)

There is a trade-off, therefore, between the pursuit of optimal policy outcomes in terms of their acceptability to those to whom the administrator feels most accountable, and the pursuit of outcomes acceptable to the wider public, derived through the establishment of constructive relationships. The efficiency, elegance, and sophistication of an optimal policy outcome designed by experts may not be immediately recognizable to the lay public who are more concerned about a policy process in which there are questions concerning the interests for whom the policy is optimal. On the other hand, although the policy outcome may not be optimal in terms of expert opinion, support of the public is more likely if the process is generally judged as being fair in terms of who was involved, the criteria, and the process for making the decision.

Potapchuk (1991, p. 159) suggests that consultation should be considered as a strategy for building consent rather than minimizing opposition. He summarizes a consensus among public participation practitioners by recommending the following principles for structuring

consultation. His recommendations bear a remarkable consistency with the bounding techniques used by participants in this study:

1. ensure participation is broadly inclusive;
2. provide sufficient information on the data, technical issues, and other options;
3. develop a common definition of the problem;
4. help the participants educate each other;
5. identify multiple viable options;
6. make decisions by consensus;
7. allow participants to share in the implementation of solutions; and
8. ensure participants share responsibility for the management and ultimately the success of a process. (Potapchuk, p. 159)

These are useful principles which, in the opinion of the practitioners, speak to the critical purpose which consultation serves. Consultation, for them, is essentially an act of relationship building. It is not a process of educating the public about issues, nor is it a process of power delegation, although both are elements in a constructive consultation. Public consultation, therefore, is a dialogue in which value perceptions are shared and clarified. It is a process for the development of mutual respect and confidence. From the perspective of the administrators participating in this study, the conversation metaphor used by one of the administrators is most apt, for it captures both these qualities while also hinting at the possibility inherent in all conversations: that the quality of the information exchanged is directly dependent upon the quality of the relationship among the participants.

There is a clear distinction between the two orientations to consultation presented by the administrators in this study, between the pursuit of optimal policy outcomes and the pursuit of outcomes acceptable to the wider public. The first presumes that the quality of the organization's relationships with its public is dependent upon the policies resulting from the consultation. The second presumes that the quality of policy outcomes of the consultation is dependent upon the organization's relationships with its public. This distinction appears also to demarcate two approaches to consultation, one which is a genuine effort to engage the public in the making of public policy from another which is manipulative and structured to achieve unstated or pre-determined policy goals.

Summary

These models of consultation show clearly that public consultation is at the mid-point of public involvement practices, lying between the delegation of power from government to the public at one extreme and the manipulation of the public to achieve policy goals at the other. It is the structure of the process which determines to which extreme each

consultation leans. The determinant is the perception of fairness, in terms of who is participating in the decision, by what criteria the decision is to be made, by what process and with what outcomes.

Administrators exercise considerable influence over the outcomes of consultation through the design and execution of the process. The administrators in this study used a number of techniques to bound the range of possible outcomes from the consultation. By choosing the timing of the consultation in the policy process, selecting public participants, setting the agenda, establishing the information base, choosing the consulting techniques, compiling and analyzing the results, and recommending decision alternatives, they put in place a process which can yield results which are acceptable to those to whom they feel most accountable. These actions raise issues of perceived fairness in the process which ultimately determine the degree to which the process is perceived as credible and the outcomes are seen as acceptable. Thus, in structuring the consultation to achieve certain pre-determined outcomes, or to ensure that the outcome of the consultation falls within a certain range of acceptability, the administrator runs the risk of jeopardizing perceptions of fairness and, consequently, the constructive relationships which may have been built.

Chapter Summary and Findings

Administrators reported that their primary responsibility in consultation was for the process and not for the outcome. There was a recognition, however, that accountability for the process would be measured in some degree by its outcomes. Therefore, it was clear that administrators had considerable influence over the outcome of the process in the way it was structured. Administrators were in a position to limit the range of possible outcomes of the consultation through timing of the consultation in the policy process, selecting of public participants, setting the agenda, establishing the information base, choosing the consulting techniques, analyzing and compiling the results, and recommending decision alternatives. In each case, the implicit and explicit selection of design features had important implications for the outcome of the consultation and for subsequent development of policy.

In reflecting on the contribution of public consultation to the making of policy, the administrators showed two fundamentally different orientations to the relationship between the public and policy. The first reflected a belief that the quality of the organization's relationship with its public was dependent upon the policies resulting from the consultation. It was oriented toward the development of quality information which could be used in a linear policy process to produce identifiable policy outcomes. This orientation was based

upon the pursuit of optimal policy solutions combining professional expertise with public preferences in the resolution of complex problems.

The second was based on an understanding that the quality of policy outcomes from the consultation was dependent upon the organization's relationship with its public. This orientation exhibits a greater faith in the capacity of the public to participate in policy making and a recognition that policy will be more easily implemented if relationships, ownership and structures of support are put into place during the policy development process. It represents an orientation to the formulation of policy which is acceptable in the community. Therefore, these administrators view consultation as an act of relationship building, a process of meaningful exchange in which on-going accommodation among participants results in policies that are acceptable to those affected. For these administrators, the credibility and inclusiveness of the process is critical. Consultation becomes a means for the public to develop ownership in the process and in the policy outcomes. However, development of these constructive relationships is not achieved within a single external loop in an internal policy process. It is a continuous activity in which there is constant involvement of those affected by policy decisions in the process of making those decisions.

Figure 7 shows the single loop model of consultation within a linear process of policy formulation. This common approach to consultation is based upon the pursuit of information to support the generation of optimal policy outcomes through an internal policy process. However, it also has the potential of excluding or alienating large segments of the public, thereby reducing public acceptance of what may otherwise be an optimal policy.

The policy process indicated here is a linear one in which consultation is employed in the process of finding a solution to a policy problem. The process proceeds through the nominal stages of problem identification, identification of alternative strategies, and implementation of strategies. Consultation in the single loop model at any stage in the process would no doubt provide the necessary information to enable the process to progress to the next stage with an understanding of the preferences of the persons directly involved in the consultation and possibly having formed a constructive relationship between administrators and the public.

However, as some of the participants in this study noted, those involved in the process at one stage in the policy process will not be the same as those who may be involved at another, and even if they are, their interests and values may have changed considerably.

The public is not monolithic, but an amalgam of individuals with differing interests and associations, and groups of differing size and influence. As Creighton (1981) and Grunig and Hunt (1984) suggest, the degree and nature of participation by the public in the process of policy formulation will change as they become more aware of the personal impact associated with the policy. Those who have been directly involved in the single loop consultation, indicated in Figure 7 by the shaded circles of varying size and overlapping associations, may not be the same as those whose interest may be raised later as the policy develops and the personal impact becomes more apparent.

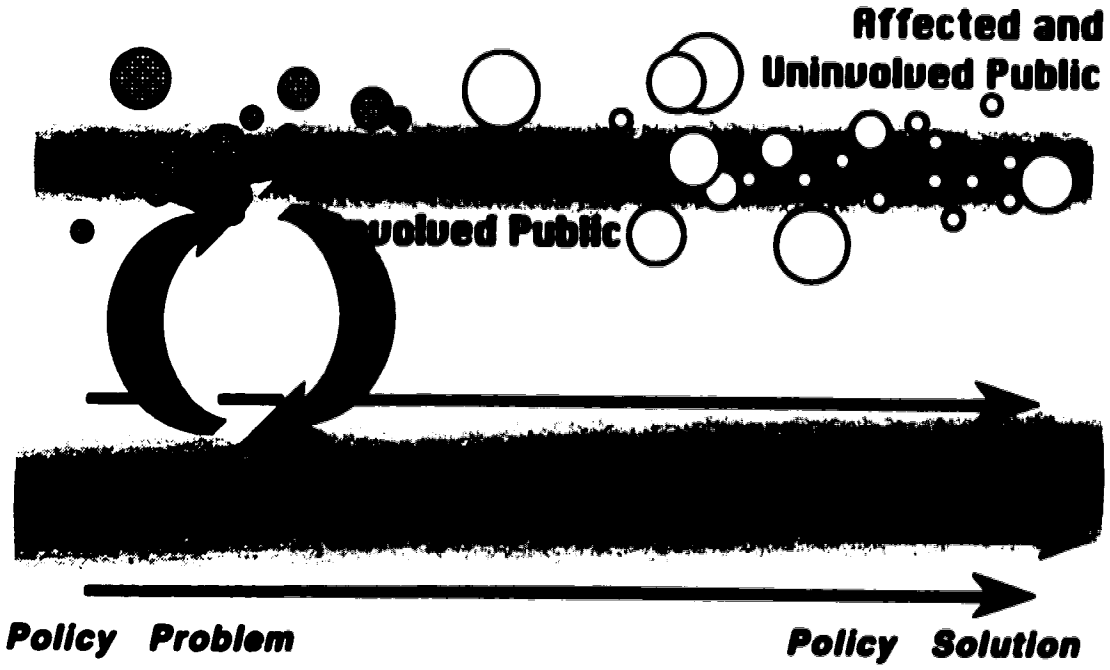

Figure 7 - Single Loop Consultation

More significantly, there are also those in the public who may be excluded or alienated by the outcomes of a single-loop process. Some may feel that their participation was not welcomed, that their concerns were not valued, that the process was not fair, or that the outcomes were not consistent with how they viewed the process. Others may feel that they will not be affected or affected positively by the policy and they will exclude themselves from the process, seeing no reason to participate. Later, however, as the policy evolves through further negotiation in their absence, those interests may no longer be supported. There are also those who, having once participated in the policy process may feel rebuffed when their continued involvement is no longer requested. These sectors of the public are in jeopardy of becoming alienated from the consultation and the policy process.

When people are alienated from the process, the constructive values which they bring to the policy process as well as those which brought about their sense of alienation are no longer represented in the development of policy. These people do not support the process and are unlikely to support the policy outcomes. Therefore, the pursuit of information through a single loop of consultation in the policy formulation process has a greater probability of producing policy which is antagonistic and unacceptable, regardless of its technical merits.

The single loop process has all of the attributes of the bounding techniques used by some of the administrators in this study. The single loop is associated with a specific stage in the policy process, and this timing dictates the sectors of the public which will be affected and which will most likely become involved. Similarly, as the single loop is associated with a view of policy as a linear process, the agenda and information base are specified by the policy problem to be resolved. The policy process remains internal to the organization and, therefore, the techniques used in the consulting process and the analysis of data are consistent with those accepted by the organization. Recommendations of decision alternatives are the product of the single loop consultation wherein the products of the consultation are data in the policy process, weighed with other information according to the values of the organization.

Others in this study evidenced a very different approach to the bounding techniques used to structure the consultation in a manner more consistent with building a constructive relationship. Participation is inclusive rather than selective, with participants educating each other as new people are brought into the process. Consultation is used throughout all stages in the policy process from developing a common definition of the problem, through the identification of viable options to implementation and evaluation. The agenda is shared, as is relevant information developed along the way, in an effort to build trust and to seek consensus, rather than just a majority opinion. Decisions become those which can be implemented effectively because of the ownership of the process developed by the participants. This approach is not the product of a single loop consultation but instead requires a longer term process in which trust and ownership can evolve.

Figure 8 illustrates a continuous process of consultation designed to build and maintain positive relationships with the public through on-going consultation activities. The policy process is veiwed as cyclical, and continuous consultation is used at all stages to ensure that those affected by the policy are aware and supportive of the process. The purpose of using consultation throughout the policy formulation process is to build support for the process and to develop constructive relationships within which community values can be

articulated and taken into consideration. The techniques of consultation are not used expressly to bound the outcomes of the process. As the diagram illustrates, the objectives are to build an increasingly inclusive basis of participation among the affected public, to pursue the alienated and excluded, and to mobilize the community to become involved and continue to participate in the process.

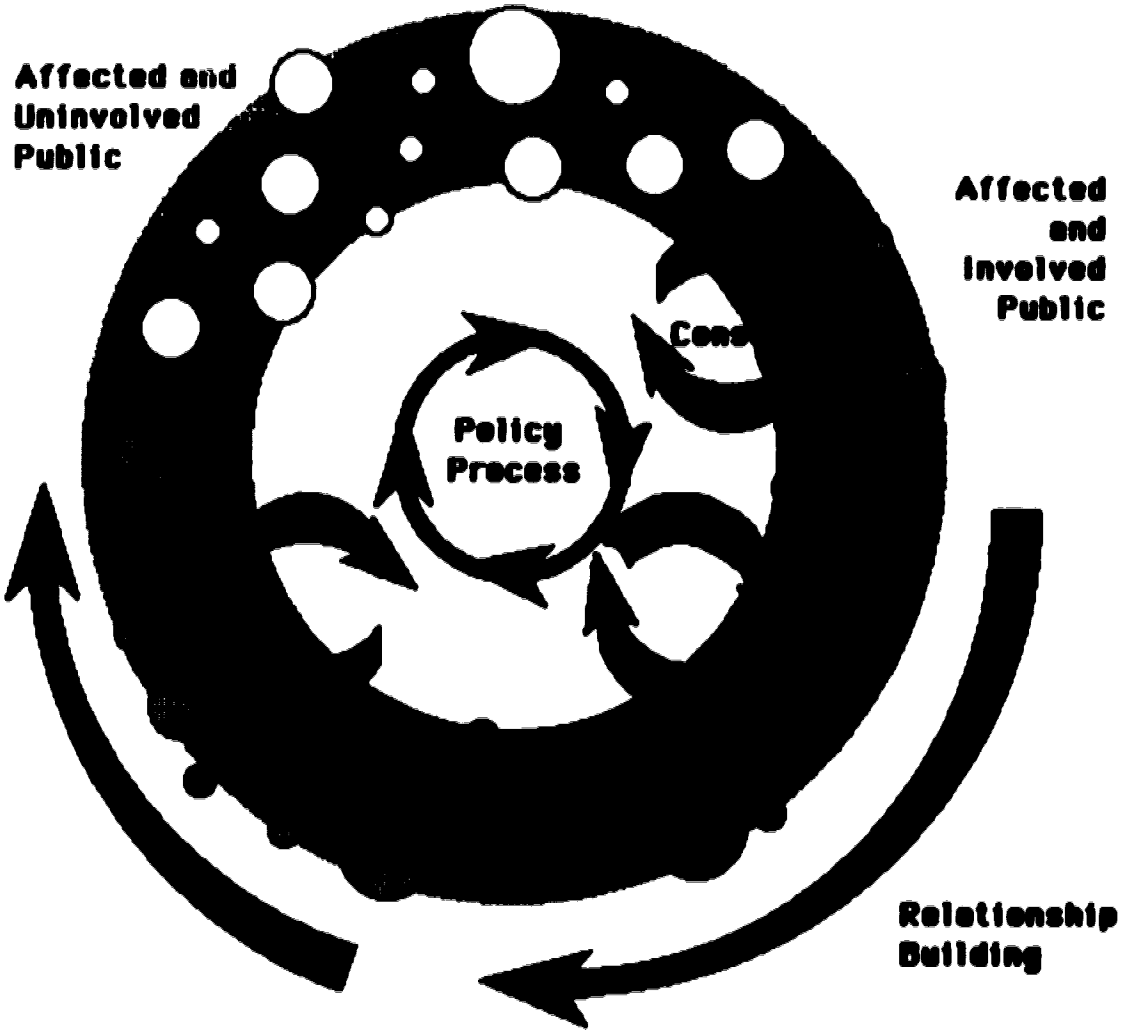

Figure 8 - Continuous Consultation

There are obvious physical constraints to structuring a continuous consultation process and widening the extent of involvement in the policy process. However, the purpose is to establish the shared structure of community values as the value framework within which contending demands can be reconciled. The process is one of dialogue. It is an exchange of values among participants and a validation that the process and outcomes at each point remain consistent with those values. Consultation as the pursuit of a community value structure is neither manipulation nor power sharing. It is an effort to democratize the

process of policy analysis through increased citizen participation in the articulation of community values thereby raising public confidence in policies on which they were consulted, even though the final policy may not agree with their particular preference. It is an effort to bring greater coordination between the values of administrators and of citizens, thereby increasing the alignment of bureaucratic behaviour and citizen interests. It is an effort to bring administrators into the community in order to generate an understanding of generally shared meanings in the community.

Thus, as Pressman and Wildavsky (1979) contend, the process becomes the purpose. Policy outcomes are not as important as whether or not the process resu!ts in a consensus on goals and a shared commitment to pursue the implementation of the policy. The primary purpose of this policy process is to build trust, confidence and credibility, not so much in the policy itself, but in the process used in generating the policy. It is the consensus of the public participation practitioners that a credible process is one which is perceived as fair in terms of who is making the decision, by what criteria, through what procedures and with what outcomes. These are the essential values upon which relationships are built and which are constructive in the formulation of policy.

Chapter 6

Toward a Theory of Public Consultation and Public Policy

Chapter Overview

This chapter explores the understanding of administrators regarding the role of public consultation in the formulation of public policy and integrates the themes emerging from the experiences of these administrators with those found in the literature. The objective of the research was to develop relevant and useful information for practicing administrators faced with the challenges of implementing an effective consultation process and to develop some propositions which might guide future research. This chapter will first outline the story which emerges from the shared experiences of the administrators participating in this study. Second, a provisional framework for understanding the role of public consultation in the formulation of public policy will be proposed. Finally, through further interpretation of the framework, an alternative role for consultation is presented.

Administrators, Public Consultation and Public Policy

In the analysis of themes emerging from the public consultation experiences of these administrators, a consistent story appears. It begins with the process of making public policy and the place which consultation fills within that process. Public policy is formed within a context of a bureaucratic hierarchy which places a great many organizational constraints on administrators, particularly those associated with their sense of accountability and the closely related concept of vulnerability. In order to secure outcomes from the consultation process which are within the bounds of acceptability of those to whom administrators feel most accountable, they either knowingly or unwittingly use various techniques to structure the consultation. The pursuit of specified outcomes sometimes comes at the expense of constructive relationships with the public.

The Role of Consultation in the Policy Process

For most of the participants, policy making is viewed as a linear process that begins with the identification of a problem and proceeds through the identification of alternatives and selection of a strategy, and then moves on to implementation. The process has a beginning

and an end, and, though not always completely visible to each administrator, the process is conducted within a known organizational framework. Public consultation is an activity which is external to the organization and the policy process. It is viewed as a single step in the linear policy process, and in many cases it is ancillary to the policy process.

Consultations can be conducted at any stage in the policy making process. However, typically, the involvement of the public is sought at some point to meet the requirements of a specific stage in the policy process, after which the process moves into another stage distinct and removed from that in which the consultation was conducted. The stage at which the consultation is conducted creates particular objectives for the consultation. In general, consultation strategies are designed to serve two objectives. The first and most prevalent is to provide information on the preferences of specific interests, validation and modification of proposed policy directions, or value-added information which clarify positions or priorize proposed actions. The second objective is to structure relationships with the public which would facilitate the further progress of policy development and implementation through collaboration or negotiation among interests, to develop public ownership in the decision, or to establish partnerships in the process. The goals and anticipated outcomes of the consultation then derive from these objectives.

The Administrative Context

Far more significant to the outcomes of consultation than the policy process is the administrative context of a hierarchical bureaucracy. Administrators consistently report that they are responsible only for the consultation process. They indicate that they are responsible neither for the outcomes of the consultation nor for its impact on clients. However, outcomes may be attributed to the process by legislators, clients, or others in their organization or profession. That is, a good process will produce acceptable outcomes, and unacceptable outcomes result from a poor process.

Administrators each experience a particular hierarchy of accountability to legislators, to clients, or to their organization or profession. The externalization of the policy process generates the possibility that the outcomes of the consultation process may be unacceptable to those to whom the administrator feels most accountable. For example, administrators who feel accountable to legislators prefer to achieve politically acceptable results; client advocates prefer those policy decisions or programs that are consistent with the demands of clients; and professionals prefer that policy outcomes are consistent with professional or organizational values. These administrators are also aware that acceptable results for one

group may alienate another. As a result, many administrators experience a sense of vulnerability because acceptable outcomes for those to whom they feel most accountable may result in damage to relationships with others. Administrators most often express this sense of vulnerability as a squeeze between contending pressures for accountability.

Structuring the Consultation Process

With the primary responsibility for the process of consultation resting with administrators, the design and execution of the process has considerable impact on its outcomes. In the pursuit of outcomes that will be within the bounds of acceptability of those to whom administrators feel accountable, and in avoiding vulnerability and risk, administrators are in a position to use a number of techniques to frame the boundaries of possible outcomes. By choosing the timing of the consultation in the policy process, selecting public participants, setting the agenda, establishing the information base, choosing the consulting techniques, analyzing and compiling results, and recommending decision alternatives, administrators retain considerable control over the outcomes of consultation. Thus, even though the process of public consultation is external to the normal policy process conducted within the organization, the process remains subject to the demands of a bureaucratic administration. Thus, the process becomes structured around the outcomes of the consultation, with only a secondary regard for the relationship with the public, which is viewed as dependent upon the outcome of the consultation.

While these techniques produce outcomes that are usually perceived by the administrator as acceptable, administrators are also aware that the policy process will most likely continue to encounter resistance from those alienated from the process or its results. Even at the early stages in the consultation, administrators are aware of those who are not a part of the process and who will likely not accept the outcomes. However, administrators are unable to deal with these difficulties because of the pursuit of acceptable outcomes and because of the material constraints placed upon the process.

The Impact on Relationships

Administrators show two fundamentally different orientations to relationships with the public and to the content of policy. The first reflects a belief that the quality of the organization's relationship with its public is dependent upon the policies resulting from the consultation. The second is based on an understanding that the quality of policy outcomes from the consultation is dependent upon the organization's relationship with its public. The first represents an orientation to policy motivated by a desire to build public support, or to

avoid alienating existing support, by accommodating public demands. This is an approach which seeks optimal policy solutions combining professional expertise with public preferences in the resolution of complex problems. The second is an orientation toward policy based upon a recognition that policy will be more easily implemented if relationships, ownership and structures of support are put into place during the policy development process. This approach takes a longer term perspective on policy implementation in which an acceptable policy has a greater chance of being implemented. It also represents a greater faith in the capacity of the public to participate meaningfully in policy making.

A Framework for Understanding

There are two very important dimensions which resonate through both the story which emerges from the administrators participating in this study, and the literature which speaks to the various themes presented by the participants. These dimensions are presented in Figure 9. Together these describe the administrative context of public consultation, and form a basis for understanding the role of consultation in the formulation of public policy.

The vertical dimension represents the sense of contending accountabilities felt by administrators extending from an accountability to clients at one extreme, and to legislators at the other. Administrators in this study consistently described their experiences in consultation as being a squeeze between the contending demands of legislators and clients. However, administrators were very specific as to their individual accountability and how that may be defined. Legislators are those persons within the organization to whom the administrator is hierarchically accountable. They exercise direct authority in the policy area by virtue of a legislative mandate associated with their appointment in government, or their elected position as a representative of the electorate. At the other extreme, clients are the recipients of the services which the policy mandate makes possible. Clients form only one element of a fragmented set of parties active in the specific policy community or in the wider public. Clients are those persons in the community with whom the administrator works in exercising the policy mandate, and who have the ability to bring some form of direct pressure on the administrator to have their demands considered.

Reconciling these contending demands is the work of an administrator. However, administrators have differing perceptions of their respective accountability in attending to these matters, depending upon their day-to-day associations with legislators and clients. Some feel more accountable to one than the other, creating varying senses of vulnerability

to those whose interests have not been met. Nonetheless, the essential component of the administrator's efforts is in some way linked to balancing the political demands of the legislator and the service demands of the client.

Figure 9 - Values and Accountabilities

These contending demands are resolved normally within the value structure of the organization. In the everyday policy making process, policy problems are addressed by assessing alternatives through the criteria dictated by the culture of the organization, or by the values of the profession. Administrators are skilled professionals in their own right. They understand the organizational culture and are trained either formally or through socialization in the professional values which must prevail. They are knowledgeable in how these values have been applied in previous situations and the allowable latitude in possible deviations in their application. They are schooled in the logic of appropriateness,

for if they were not, their actions would be antagonistic to the smooth functioning of the organization, creating a sense of personal vulnerability for the administrator and a clash between the goals of the organization and the individual.

Contending demands are also resolved within a known policy process. Policy making is most often an internal process, responding to internal demands and to the internal environment of the organization. External environmental information is only incorporated into the policy process to the extent that is has been translated into the internal information needs of the organization. The preferences of those who are neither clients nor legislators are only useful as information which is either consistent with existing information or which can be transformed into information which is useful and integrated with the culture and values of the organization.

The structure of the policy process in an administrative bureaucracy is also well understood and perceived to be segmented, linear, sequential and rational. Each stage in the process has a beginning and an end, a policy problem in pursuit of a policy solution. Information is the basis of this process, as it is information which forms the products which are handed from one stage in the policy process to another. Throughout the process policy-relevant information is assembled to structure the decision. Considerable discretion is available to administrators in compiling relevant information. In exercising this discretion, it is the culture of the organization and the values of the profession which serve as the criterion of relevance.

However, in the process of engaging in public consultation, administrators are asked to consider the views and preferences of the wider community. In doing so, administrators enter into a different value framework which is sometimes alien and often permeated with irreconcilable conflict. Above all, consultation is inherently uncontrolled and unpredictable. The logic of appropriateness no longer applies. The policy process ceases to be segmented, linear, sequential or rational. The demands of the external environment dominate the internal demands of the organization, and organizational or professional values are no longer appropriate criteria of the relevance of policy information.

In response, to limit risk and vulnerability, administrators endeavour to bound the range of possible outcomes of the process by structuring it in such a way that the outcomes of the consultation are within limits tolerable to those to whom they felt most accountable. By choosing the timing of the consultation in the policy process, selecting public participants, setting the agenda, establishing the information base, choosing the consulting techniques,

compiling and analyzing the results, and recommending decision alternatives, administrators are able to exercise considerable discretion by putting into place a process which can yield results which are acceptable to those to whom they feel most accountable. Often this relegates the consultation process to one of information gathering for very specific reasons and at very specific stages in the policy process.

Therefore, the horizontal dimension in Figure 9 represents contending value structures. On the right are the values present in the organization or profession with which the administrator is associated. These are the prevailing values held by the members of the organization, whether explicitly recognized in existing policy or regulation, or implicitly embodied in the cultural values of the organization or profession. On the left are the values present in the community, or that portion of the public who feel that they are affected by or have an interest in the decisions made within a policy mandate. This conception of the community is broadly inclusive and incorporates both active participants who are aware of the policy area and its impact upon them, and the latent public who may not be immediately aware of the implications of policy alternatives, but who are no less affected. Organizational and professional values support the development of optimal policy decisions based upon professional expertise within the organization and, therefore, integrated into the policy activities of clients, legislators and administrators. Community values, on the other hand, are those present in the relevant community that bear upon the acceptance and support of decisions made within the policy mandate and are then somewhat removed from involvement in policy formulation.

These dimensions can be further enhanced by integrating them with the four conceptions of the public, those of the pluralist, public choice, representative and professional. This integration provides some insights into the impact of this framework on the formulation of public policy. Figure 10 illustrates the relationship between the orientations of administrators to the public, in terms of what constitutes the relevant public and how the interests of that public might be articulated, and the orientations of administrators to the policy process.

On the right are the professional and representative perspectives. Within the professional conception, the public is viewed as individual clients who have comparatively unsophisticated understanding of the issues that affect them. Client demands are assessed and met within the professional value structure. Those taking the representative perspective view their primary accountability to legislators in their capacity as representatives of

constituent groups. Political demands are addressed within the value framework of the institutions and organizational values of the political process.

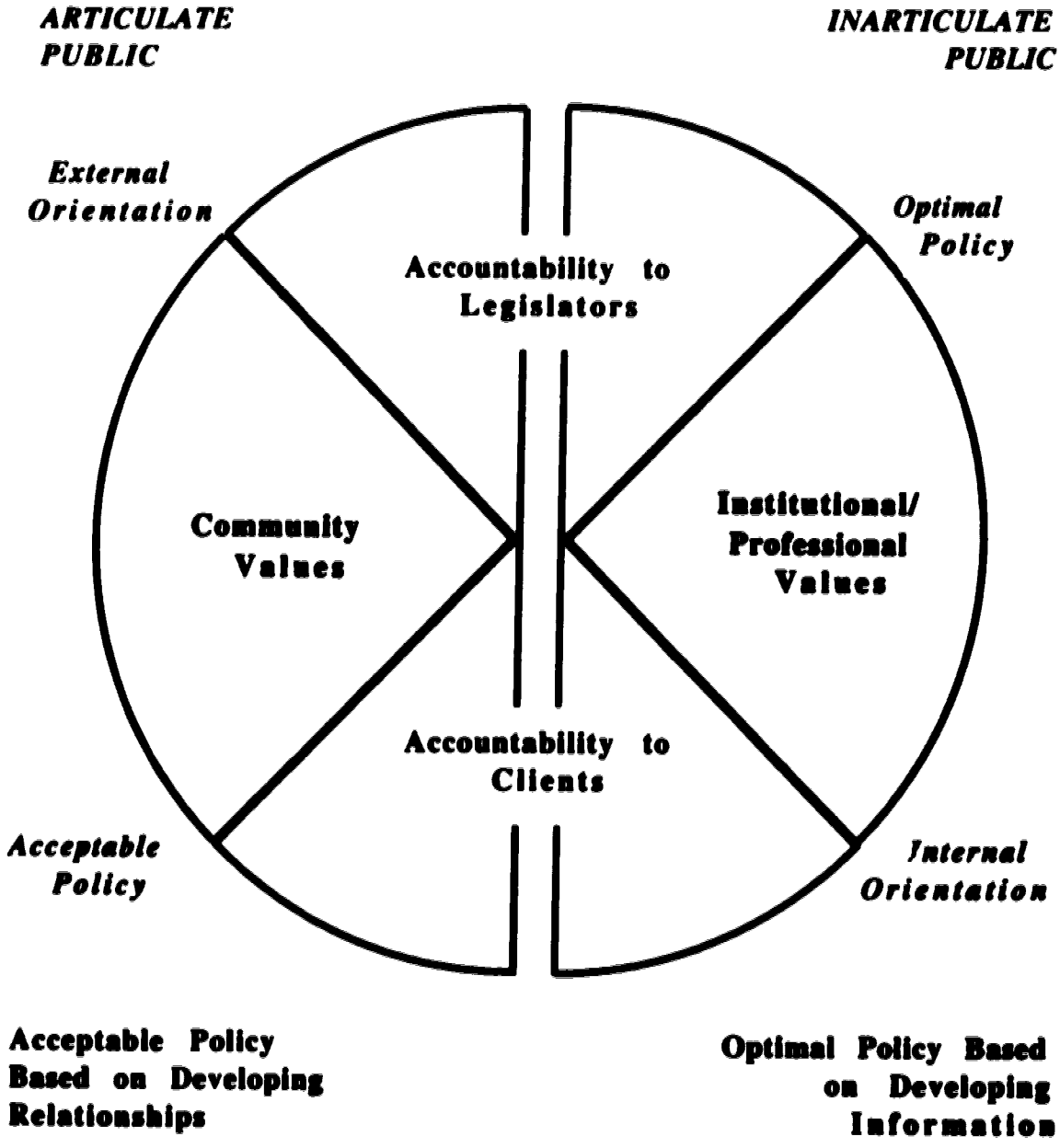

Figure 10 - Conceptions of the Public and Policy Orientations

What these two perspectives have in common derives from the mutual value structure that they share. Both view the public as being inarticulate and unable to express value positions collectively . The formulation of policy is a process internal to the organization in which optimal policy solutions are pursued. Consultation becomes the collection of policy-

relevant information to support the policy process. The criterion for relevance is, of course, the organizational and professional value system.

On the left are the public choice and pluralist perspectives. The public choice perspective takes an orientation toward the demands of the client as a consumer, wherein the personal preferences of individuals are represented as actions in a marketplace. Client demands are met through the choices the individual makes among a number of contending alternatives. The expression of the public interest is represented in the aggregated choices of the members of the community, guided by the community value framework. The pluralist orientation also views the public interest as the aggregation of contending interests, but instead, it is contending interest groups which represent these competing demands. Legislators are charged with the responsibility of enacting the net results of the interaction among these groups. These two perspectives also share common views of policy formulation. In both cases, they consider the public to be articulate and able to express common needs and values. The resolution of policy issues is external to the organization through a process which pursues policy solutions that are acceptable to stakeholders. Consultation from these perspectives is the pursuit of a supportive relationship with stakeholders upon which effective policy can develop. The basis of this policy is the framework of values present in the relevant community.

As a result, there are two distinct orientations which emerge from this analysis as to the role that public consultation plays in the formulation of public policy. The first, espoused by those adopting the professional and representative conceptions of the public, begins with a presumption that supportive relationships with the public are based upon the enactment of good policy. Good policy is the optimal solution to policy problems, developed within the organization according to the values of the organization and profession. The public is unable to contribute to this process as it is incapable of expressing a collective interest. Public needs must be translated into the policy process by professionals or the representatives of constituent groups. Direct public consultation is useful only to the extent that it contributes policy-relevant information. The collection of such information is consistent with the single loop approach to consultation in which information on public preferences is sought during a specific stage in the policy process. Adopting this approach sometimes risks the alienation of segments of the relevant policy community, and possibly the supportive relationships needed to carry the policy through to implementation.

The second orientation to consultation, adopted by those taking the public choice or pluralist perspective of the public, makes the assumption that good policy is based upon

supportive relationships with the public. From this perspective, the public is quite capable of contributing to the formulation of policy through common social mechanisms. The resolution of policy problems is external to the organization in which policy solutions that are acceptable to the community are sought. Public consultation is essential to this orientation in order to capture effectively the community value structure.

Administrators adopting this orientation view consultation as an act of relationship building, a continuous process of meaningful exchange in which on-going accommodation among participants results in policies that are acceptable to those affected. For these administrators, the credibility and inclusiveness of the process is critical. Consultation for these administrators is a means for the public to develop ownership in the process and in the policy outcomes. Building relationships is not something which typically emerges from a single loop of public consultation. It develops from a continuous process of consultation in which the public is able and encouraged to participate in the policy process at all stages, not just to ensure that their interests are met, but to develop trust in the process and to build confidence that it is fair and credible. Therefore, the policy outcomes may not be optimal from a technical standpoint, but they are implementable because they are consistent with the values of the community.

An Alternative Role for Consultation in the Formulation of Public Policy

There are two purposes for consultation which permeate both the experiences of the administrators and the relevant literature. The first is to obtain information on public preferences in policy choices, and the second, to structure supportive relationships. However, whether pursuing information on public preferences or building supportive relationships, it is implicit in these approaches that the purpose of consultation is to assist administrators to reconcile the contending demands of clients and legislators. In varying ways, administrators in this study experienced the dual role of acting as the functionaries of the legislators and the advocates of clients. Each had a different hierarchy of accountability to legislators and clients, and each also felt a sense of vulnerability to those who could exercise some form of direct pressure on the administrator if their demands were not met. However, this sense of contending accountabilities creates only the contextual boundaries for the process.

At base, these divergent approaches to consultation, to either obtain information or develop supportive relationships, are based on fundamentally different value structures and

grounded in contradictory and incompatible assumptions about the nature of the public and its place in policy formulation. There are drawbacks to both approaches. Consultation for the purpose of collecting information can alienate large segments of the public and jeopardize the support required to implement the policy. On the other hand, consultation for the purpose of building supportive relationships could well lead to the frightening conclusion that administrators should adopt either a pluralist or a public choice perspective in seeking community value structures. Neither of these conceptions of the public has proven to be particularly comprehensive in addressing the interests of all segments of the community affected by policy decisions. Nor are they any more effective than the professional or representative perspectives in accurately representing these interests in the calculation of policy choices, in large part because they are all based upon a directed accountability toward either legislators or clients, but not both.

It is here that the ladders of citizen participation of Arnstein (1969); Connor (1988); Potapchuk (1991); and Chess, Hance and Sandman (1988) provide a reminder that public consultation is only one of many citizen participation approaches. Consultation is consistently at the mid-point of each of these continua, at the juncture between the shifting of power from government to the public at one extreme, and the manipulation of the public to achieve the predetermined objectives at the other. It would be unfair to equate the public choice or professional stance with delegation of power or the pluralist or legislative stance with manipulation. Instead, administrators employing consultation in the formulation of public policy are more likely to be doing so to facilitate the reconciliation of these contending demands and as a tool to aid in the basic work of the administrator. The divergence in approaches to and outcomes of consultation derives from the fundamental difference in value framework adopted or pursued. An alternative role for consultation is therefore the pursuit of a comprehensive, effective value structure within which the contending demands for accountability from clients and legislators can be reconciled. From this perspective, consultation becomes a public policy mechanism which has the potential, first, to bring the values of the community into the normally internal process of policy formulation and, second, to reconcile the professional and organizational values of the organization with those of the community with which it is associated.

Consultation is, therefore, an act of politics. It may be useful to adopt a conception of politics provided by Barber (1984) as it addresses many of the aspects of public consultation in the reconciliation of contending demands. Barber defines politics as

> being circumscribed by conditions that impose *a necessity for public action, and thus for reasonable public choice, in the presence of conflict and in the*

> *absence of a private or independent grounds for judgment.* (Barber, 1984, p. 120, emphasis in original)

Using this conceptualization, a political question for Barber takes on the following form: "What shall we do when something has to be done that affects us all, we wish to be reasonable, yet we disagree on means and ends and are without independent grounds for making the choice?" (p. 120.) The use of such a conceptualization provides substantial scope for interpreting the role of consultation in the formulation of public policy. To be considering public policy indicates that an action of public consequence is necessary. The need to consult reveals the potential for conflict among interests and the requirement for choice in the absence of an independent ground. From this perspective, then, public consultation is conducted to address political questions and is, in itself, a political process.

Barber's approach recognizes that the basis of political choice is often among actions in which there may not be an apparent correct or right course to take. It also recognizes that for many political problems, some action must be taken, for when the consequences are assessed, making no decision becomes a decision in itself. Finally, Barber recognizes that the decisions that have to be made are often made in the absence of direction.

> To be political, is thus to be free with a vengeance - to be free in the unwelcome sense of being without guiding standards or determining norms yet under an ineluctable pressure to act, and to act with deliberation and responsibility as well. (Barber, p. 121)

The role of the administration is to provide some direction in the making of political decisions in the form of whatever independent ground might be available to guide the decision. Normally, the role of the administration has been to offer a basis of objective information to the problem, or to provide a rational process for its resolution. In effect, it is the job of administrators to provide the independent ground for judgment. However, in doing so, administrators put such information forward, not as an independent ground, but as a proxy for politics. The role of consultation has been to provide the information necessary to the policy process which will guide the decision. However, information derived from consultative processes is not independent, but reflects the deeply held values of the organization and the profession or those of the community as represented in its aggregated interests. Thus, the independent ground is neither independent nor adequately comprehensive for forming a basis for judgment.

This is the fertile ground of manipulation. Throughout this study, manipulation has been mentioned frequently as the antithesis of effective consultation. Rather than providing

policy-relevant information necessary to the process, manipulation is the presentation of self-interested or biased information leading to predetermined conclusions while representing such information as being an independent ground for judgment. Clearly, in most cases, structuring consultation in such a way that the outcomes fall within the tolerable limits of those to whom the administrator feels most accountable should be considered to be manipulation. However, manipulation is not the sole domain of the administrator. It arises in a variety of forms, surfacing throughout the process of policy formulation. This research has alluded to manipulation of the consultative process by legislators and clients, and by interest groups within both the community and the organization. Manipulation becomes easily justified when a right course of action is dictated by a congruent value structure.

Therefore, manipulation is more likely at the extremes of the dimensions represented in the framework, when the parochial values and interests of clients, legislators, the organization or the community become paramount above all others. A continuing battle rages in the mutual manipulation of legislators and administrators, seeking to implement their respective agendas. A constant struggle exists between clients and administrators over the allocation of resources. Administrators adopting the values of the organization or profession are more likely to manipulate data and recommendations toward meeting organizational and professional objectives. Similarly, those who have accepted the value structure of the community are subject to the hyperbole of advocacy groups.

Administrators must find a balance. Good public policy does not emerge through manipulation, but through dialogue and collaboration. It is the work of administrators to seek a balance between the interests of legislators and clients, and between the value structures of the organization and profession, and the community. Thus, the alternative role for consultation in the policy process is to provide a forum for the reconciliation of the contending value structures of the policy organization and the community in which that organization functions and thus provide a legitimate and strong basis for decision. Consultation from this perspective is not the pursuit of an independent ground for decision, but rather a method for entering into dialogue about the nature of the policy problem, what must be done, the implications of those actions, and how we will determine the criteria for choice. Consultation is, from Barber's perspective, an act of politics.

Figure 11 indicates that the squeeze so often referred to by the participants in this study, while appearing to be between the contending demands for accountability of legislators and

clients, may have also been a squeeze between the value framework of the organization or profession and the value framework of the community.

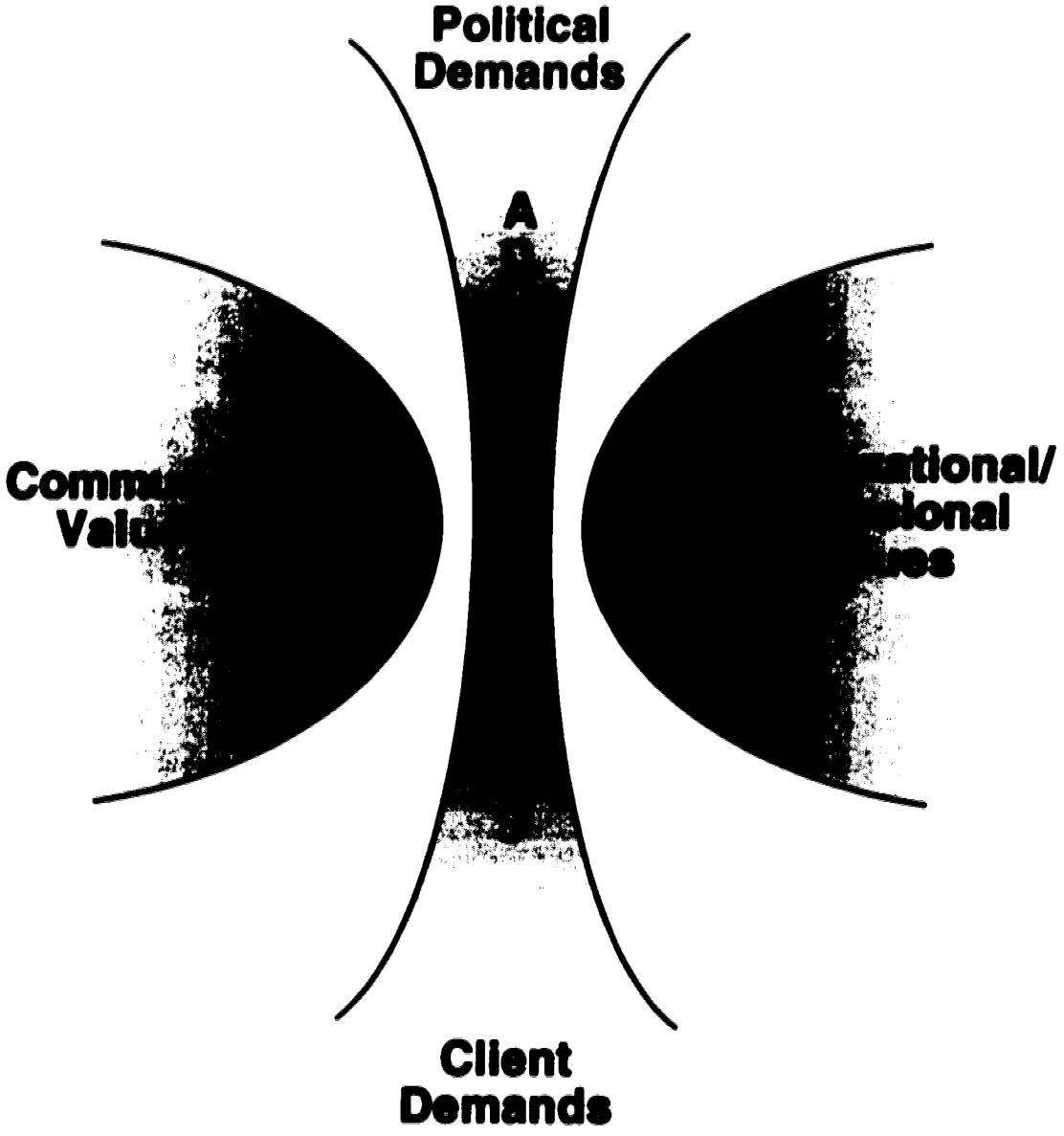

Figure 11 - Reconciling Contending Values

While the work of the administrator is to reconcile these contending demands, the role of consultation may not be of great assistance in achieving this reconciliation. However, consultation can make a substantially more significant contribution in the development of a consistent value framework in which all participants share a common criterion for the development of policy.

To reconcile contending values, there must be an acceptance of the legitimacy of the roles and values of those concerned. Effective policy must reflect the needs and values of the community for it to be accepted and implemented. However, we also expect the best policy that can be achieved. It is necessary, therefore, to apply the expertise of those with professional knowledge and skill to the problem, the identification of creative alternatives, the implementation, and the continuing evaluation of the best option. Contemporary public policy is complex and requires considerable organization to realize planned results. Clients have a responsibility to make their demands known, just as legislators have an equal duty to construct and maintain the legislative and political structures which can support and facilitate the development and enactment of effective policy. The process of consultation provides a method for these contending roles, values and interests to be brought into a rough balance. Various participants can be exposed to the perceptions, demands, and abilities of others. Thus, the basis for negotiation is formed. However, it is formed within a context of shared values, trust in the process, and more accurate understanding of the perceptions of others.

This approach recognizes the contending accountabilities felt by administrators and suggests an appropriate response. As Figure 12 illustrates, consultation for the purpose of reconciling contending value structures accepts that administrators have a hierarchy of accountability which is reflected in the structure of the consultation and the policy objectives that are pursued. On the top are the pluralist and representative perspectives which both seek the reconciliation of the contending interest groups, one through direct contact with their representatives and the other through negotiation among the groups themselves. The purpose is to widen the base of participation, externalizing the process of developing optimal policy. The administrator is in the position of finding common ground and reporting this as the basis for policy negotiation to the legislator. This approach is consistent with multi-stakeholder consultation in which recognized interests are considered in an attempt to achieve a common solution to the policy problem. On the bottom, are the public choice and professional perspectives. These conceptions of the public seek to determine the needs of individual clients. The public choice perspective seeks to do so by allowing individuals to choose. The professional perspective seeks to interpret individual needs through the application of professional knowledge. Here, the purpose is to open the organization to policies that are more acceptable to clients, bringing individuals from the community into the internal policy process. The role of the administrator is to identify the individual needs of clients and to ensure that these needs are satisfied in the formulation of policy.

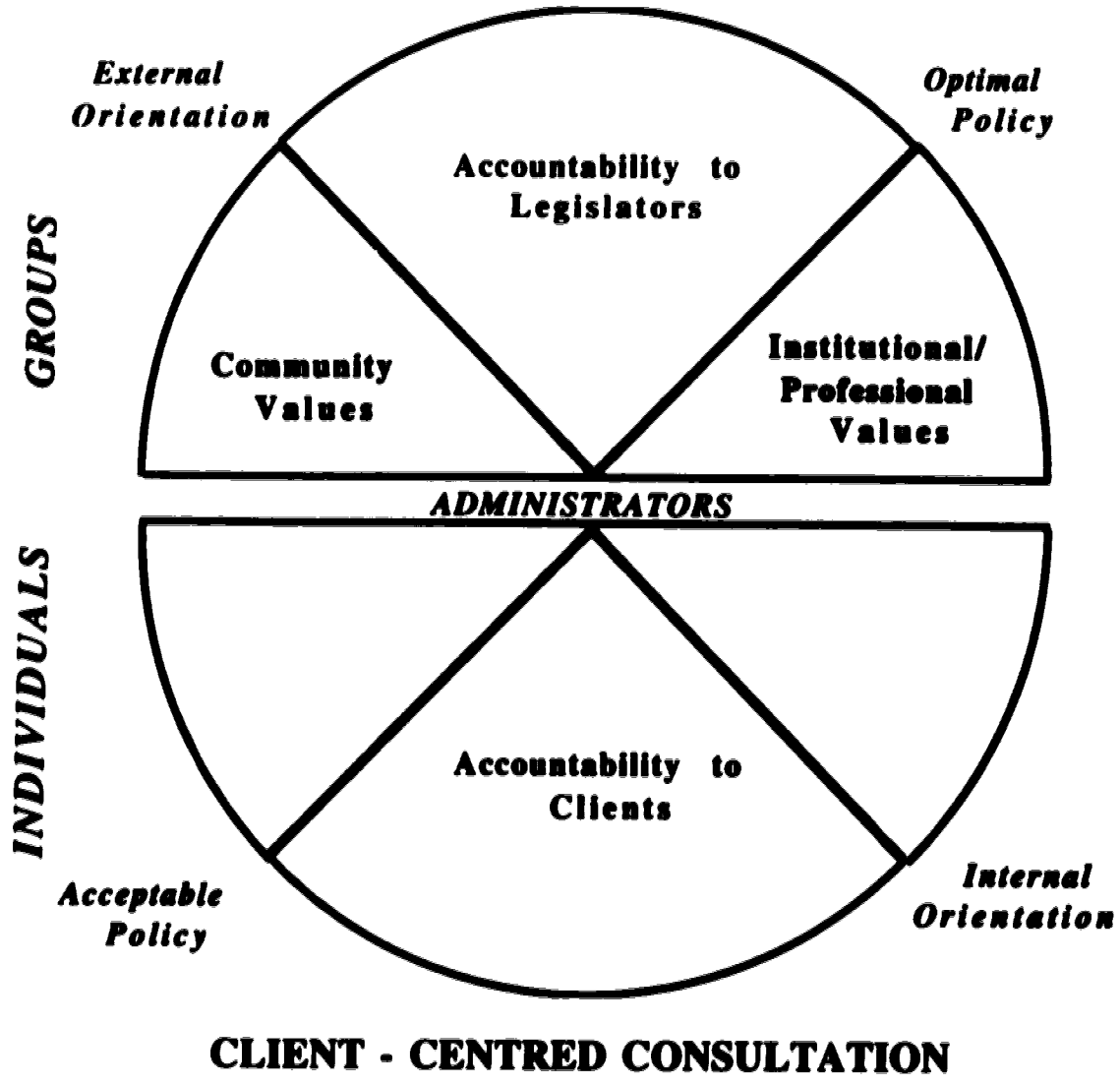

Figure 12 - Multi-Stakeholder and Client-Centred Consultation

While these approaches are shown as being distinct, they are integrally linked. The linkage is the basic responsibility of the administrator. The job of the administrator is to reconcile the contending demands of clients and legislators. Some administrators feel more accountable to one than to the other, but they recognize that each must be satisfied to some degree if the policy is to be implemented successfully. This approach to consultation recognizes this fundamental role and places the responsibility for conveying the results of each form of consultation into the other arena in which these contending demands can be reconciled. However, this reconciliation now takes place within a common value

framework, derived through consultation, which is appropriate to the policy problem and the orientations of the responsible administrators.

Finally, this approach also accommodates the two primary purposes for consultation. Clearly, to build a shared value structure, there is a need to build constructive relationships. However, there is an equivalent need to share information. The public must be educated on the often technically sophisticated issues which underlie contemporary public policy. Policy decisions cannot be based solely upon the naive or ill-informed opinion of the lay public. However, policy decisions are not strictly made on the basis of technical calculation. Administrators must also be made aware of the preferences, demands and expectations of the public. The single loop approach to consultation will not satisfy either the need to build relationships nor the need to share vital information. Only a continuous process of consultation will build the type of trust and involvement necessary to create effective and achievable policy outcomes. Thus, consultation in order to reconcile contending value frameworks requires an on-going process which will both build relationships and provide useful and pertinent information. Consultation is an on-going dialogue, a conversation among concerned partners who respect the needs and resources of others, who are involved in constructing a shared process, and who are seeking a mutual resolution of a common problem. Consultation for the purpose of building a shared value framework is not a single event, but a process. It is not the just the pursuit of information on preferences, although such information is essential to the development of effective policy. Consultation is not just the pursuit of relationships supportive of the policy direction, although the implementation of policy is made substantially more difficult without the support of those affected by policy decisions. Consultation for the purpose of building a common value framework is composed of both in strong measure. It is the careful and intricate process of entering into and of building a conversation on those things that concern us with those who share those concerns.

This more comprehensive approach to consultation becomes the kind of politics envisioned by Barber in to answer the question, "What shall we do when something has to be done that affects us all, we wish to be reasonable, yet we disagree on means and ends and are without independent grounds for making the choice?" It is consistent with the democratization of policy analysis called for by de Leon (1992), in which increased citizen participation in the articulation and formulation of public policy will result in greater public confidence in policies on which they were consulted, even though the final policy may not agree with their particular preference. It is also consistent with the perspective of the New Public Administration movement, described by Kweit and Kweit (1981) as well as Viteritti

(1990), which seeks greater coordination between the values of administrators and those of citizens and increased alignment of bureaucratic behaviour with citizen interests. It is also in keeping with the interpretive stance of Torgerson (1986) who suggests that policy analysts cannot be detached, objective observers, but instead must be participants in the community in order to understand generally shared meanings. Above all, it is consistent with one of our most basic human characteristics, to seek the company and mutual support of those with interests that we share, and to exchange what we know to our mutual benefit.

Summary

This chapter presents an integration of the research in the form of a framework for understanding the role of public consultation in the formulation of public policy based upon the story which emerges from the shared experiences of the administrators participating in this study. This framework is built upon two critical dimensions, the contending accountabilities to clients and legislators, and the contending values structures held by the organization and the profession, and the community. It is the work of the administrator to reconcile the contending demands of clients and legislators. This reconciliation normally takes place within the value structure of the organization and within a policy process which is internal to the organization. However, in the process of public consultation, administrators are asked to consider the views and preferences of the wider community which challenge the values of the organization and externalize the process of formulating policy. In response, administrators bound the range of possible policy alternatives through the use of various techniques.

Utilizing these key dimensions, it is possible to identify two distinct orientations to public consultation. The first adopts the presumption that supportive relationships with the public are based upon the enactment of good policy. Good policy is the optimal solution to policy problems, developed within the organization according to the values of the organization and profession. The public is unable to contribute to this process as it is incapable of expressing a collective interest. Consultation from this orientation is a single external loop in an otherwise internal process of policy formulation in which information on public preferences is sought during a specific stage in the policy process. The second orientation makes the assumption that good policy is based upon supportive relationships with the public. From this perspective, the public is quite capable of contributing to the formulation of policy. The resolution of policy problems is external to the organization in which policy solutions that are acceptable to the community are sought through a process of relationship building and a continuous of process of consultation.

An alternative role for consultation in the formulation of public policy is proposed which attempts to integrate these two orientations. From this perspective, consultation becomes a public policy mechanism which has the potential, first, to bring the values of the community into the normally internal process of policy formulation and, second, to reconcile the professional and organizational values of the organization with those of the community with which it is associated. This approach to consultation views the squeeze that was frequently reported by administrators not as the clash between contending demands, but as a conflict between contending value frameworks. The role of consultation is, therefore, to provide a mechanism for the reconciliation of these contending value structures in order to form a common basis for negotiation, within a context of shared values, trust in the process, and more accurate understanding of the perceptions of others. This alternative approach provides the basis for the democratization of the policy process and for the alignment of the values of administrators and citizens.

Chapter 7
Conclusions, Implications and Reflections

Public outrage is at the heart of the kind of massive social action that brings people into the streets. In some cases these actions arise from a fundamental disagreement with a policy choice by a specific group whose interests have not been met. More frequently, however, public outrage is not so much directed at the policy decision, but at the policy process from which the public has become excluded and alienated. Contemporary government, that array of public institutions in which those decisions are made, has become a complex dominion, laced with esoteric expertise, arcane procedures, and Byzantine organization. This is the legacy of the administrative bureaucracy. The public, however, is increasingly capable of understanding the business of governing, unwinding complex organization, seeing the simplicity of getting done what is needed to be done, and knowing a great deal about the issues that affect them. Their outrage is a result of disenfranchisement from the democratic process in which there is an expectation that the voices of the public can be heard, and their wishes respected, when governments address the issues that are important to them.

Administrators are at the core of policy-making processes, their presence permeating each stage and activity. As such, administrators are being called upon more frequently to include the voices of the public in their activities and, in many cases, being called to account for their actions in public forums. Policy communities, or those groups and individuals outside of government who have a dominant voice in determining policy, can now demonstrate considerable expertise and organizational abilities. Decision processes often benefit from the participation of knowledgeable experts from the community. There is a distrust of decisions made behind closed doors, and administrators are being increasingly called upon to bring the policy process into the open. However, in doing so, administrators are often subject to situations in which the policy agenda of government is supplanted by the policy agenda of the community. Public interest groups are able to mobilize quickly and bring strong pressure to bear on administrators and the policy process. As a result, administrators are increasingly exposed to conflict, not just in the clash of contending ideas, but in the clash between contending values and those who hold to those values so tenaciously. This study has explored the perceptions of administrators

regarding the public and how their voice is incorporated into the making of public policy in order to inform the practice of administrators and provide a framework for understanding their action and future research in the area.

Conclusions

The research question investigated in this study has been the following:

What understandings do administrators have regarding the role of public participation in the formulation of public policy?

Each administrator participating in this study has a unique understanding of the role of public participation in the making of public policy. There are, however, many commonalties in those understandings. Administrators discussed the role of public consultation in three major areas: the policy process, the administrative environment, and the actions and strategies used by administrators on the structuring of public consultation. The primary finding has been that the impact that consultation has on the policy process is strongly affected by the nature of the policy process and the orientations of administrators who work within that process. The study has shown that administrators face two competing forces in attempting to resolve policy issues. They first face contending accountabilities to clients and legislators. They also face the contending value frameworks present in the organizations and professional bodies in which they work. Finally, this study has found that the orientations which administrators adopt toward these competing forces has considerable impact over the outcome of consultative processes.

These findings provide the foundations for the development of a framework for understanding the linkages between these observations and the basis for the development of theory. However, the purpose of this research is to interpret these observations in order to provide a basis for theory. As a result, a subsidiary research question was as posed at the outset of the research which asks:

What is the relationship between:
1. *the orientation of administrators to public consultation; and*
2. *the contribution of consultation to the formulation of public policy.*

In response to the question, a framework for understanding the role of consultation in the formulation of public policy has been proposed which attempts to relate the orientations of administrators participating in this study to the potential policy impact of the consultations with which they were associated. This framework suggests that there are two primary

purposes for consultation. Consultation is used, first, to develop policy relevant information on public preferences and, second, to develop relationships with the community which will support further development and implementation of the policy. Consultation for the purposes of developing information is normally a single loop of external consultation in an otherwise internal process of policy development. The use of consultation to develop relationships requires a continuous process of consultation in which the process of policy making is externalized from the organization through the involvement of community members.

As an alternative, it is proposed that consultation might be used to advantage for the purposes of reconciling the value frameworks of the community with the value frameworks of the organization and profession. This approach to consultation recognizes that both information and relationships are crucial to the development of effective policy and accepts that both the contributions of professionals and community members are essential to the identification of creative solutions. To adopt such an approach requires an on-going relationship, oriented toward the development of a common value framework within which to address policy problems. It is consultation built on the development of trust in the process, and the development of policy outcomes that are consistent with the mutually-held values of all those involved.

This study employed a qualitative research design to investigate the experiences of administrators engaged in public consultation in the formulation of public policy. It assumes that there is an essence to shared experiences and the design of the methodology emerged from these experiences, driven by the findings of each stage of the study, responsive to the indications of participants. The participants were drawn from a wide range of consultation environments to maximize the variation in their experiences and thus emphasize their commonalties. This proved to be a most effective method of avoiding the dominance of substantive policy issues or a unique policy environment. The research was conducted in stages beginning with a pilot study, followed by core interviews and concluding with verification interviews. In each, the findings of one stage were confirmed and developed in the next stages. This, too, proved to be most effective in developing an understanding of the shared experiences of administrators, particularly because the participants in each stage were very different from those in the other stages. Confirmation of earlier findings provided considerable support for further investigation. However, this research could have been enhanced by sharing the results of each stage with the participants of that stage, and obtaining their feedback. This would have provided additional depth in the analysis and confidence in the findings.

The use of the literature also departed from the more traditional approach. The themes emerging from the interviews were later explored in the literature to place the experiences of the administrators in a broader theoretical context and to enrich the value of these experiences. The purpose of adopting this approach was to base the work firmly in the experiences of practicing administrators, and to ground those experiences in the findings of other research in the area, thereby avoiding the possibility of biasing the results with the application of received theories. This approach was typified earlier as placing the researcher in somewhat of a quandary. While it is noble to enter the research environment with no fixed preconceptions, it might be dangerous and wasteful as well. One must have a conceptual map of the terrain with which to orient oneself when concepts are identified. The researcher must be informed of the issues and the sophistication of current thinking. However, the researcher must be honest and self-critical, demonstrating a willingness to take nothing for granted and to leave established thinking behind when the evidence suggests this as the proper course of action. With very little written in the field of public consultation at the time of the research, this study had a limited basis of prior theoretical work. However, as a methodological approach, researchers may be better equipped with foreknowledge than without.

Developing this research design served a most useful purpose. Public consultation is fundamentally an exercise in qualitative research. It is the pursuit of a framework of understanding regarding the policy question under investigation. This research design provides a model for the research required in conducting public consultation. It pursues a new understanding rather than the verification of pre-existing views. It is built upon the experience of participants. It relies on relationships of trust as the basis of accurate data, and its findings are true to those experiences and confirmed within those experiences. Thus, this research provides instruction not only to those who would pursue these findings further, but also to those who are conducting public consultation projects.

Implications

This research is grounded in the understandings of the administrators participating in this study. These perceptions have been examined in the context of the relevant literature to enrich the value of those experiences. From these two sources, a framework has been developed which provides a foundation for understanding the phenomenon of conducting a consultation within an administrative bureaucracy, and a basis for further research. There are a number of implications which can be drawn from this research. The findings have implications for the work of researchers, senior administrators, consultation project

managers, and practitioners, as well as for the preparation of administrators and the evolution of democratic government.

Implications for Researchers

This research proposes a framework for understanding the role of consultation in the formulation of public policy based upon the interpretation of the shared experiences of administrators engaged in consultation activities. Relationships are proposed in this study among the phenomena of administrators' experiences in consultation and the policy process, the administrative context, and the outcomes of the consultative process. This framework has been provisionally validated by the progressive selection of participants in which the experiences of one group were shared and discussed with a subsequent group as the research progressed. This can only be considered the beginning of a much longer process of theory-building in which these associations are verified in a wider context. Thus, having uncovered these provisional associations, a continuing program of research should begin with a validation of these associations on a broader scale. First, a body of case studies should be compiled upon which to build a more solid basis for investigation. Two types of case material are necessary:

1. The framework proposes a composite of theoretical characteristics of administrators adopting various perspectives on consultation based upon only superficial conversations with practicing administrators. In-depth case profiles of administrators need to be compiled to understand how these orientations to the public and the policy process affect the structure of consultation and the utilization of its products over the course of their involvement in the policy process.

2. Long term case studies of complete policy processes must be compiled to gain insight into the relative success of various approaches to consultation to determine the characteristics of that success and the conditions of failure. Are there a set of principles which can guide administrators to more effective use of the outcomes of public consultation?

Based upon this body of data, the associations proposed in this study should be investigated further. Possible research questions from this standpoint might include the following:

3. Can a hierarchy of accountability be established? Can administrators be located on a continuum of accountability and, if so, are there behaviours and perceptions which are consistent with those located at points along that continuum?

4. Is there a consistency among administrators pursuing either information or relationships through consultation, regarding their assumptions about the characteristics of the policy process or about the nature and capabilities of the public to contribute to that process?

5. Can the orientations of administrators to the public described in Figure 2 be validated empirically? Are there consistent associations among the differing orientations of administrators who conceive of the public as being composed of either groups or individuals, or as being articulate or inarticulate, or who view policy as being either optimal or acceptable?

6. Can the consistency between the value preferences of the administrator and those of either the organization/profession or the community be demonstrated? Having demonstrated a consistency in value preferences, do administrators structure consultation in a manner consistent with the proposed framework?

7. Are the seven techniques identified in this study employed consistently to bound the outcomes of consultations? Are these bounds consistent with the preferences of those to which the administrator feels most accountable?

8. Is there a demonstrable association between administrators' approaches to the structuring of consultation and the perspectives that good policy is dependent on good relationships? Conversely, can it be demonstrated that good relationships are built upon good policy?

These are questions of validation. However, if this research is to inform the practice of administrators, the program of research must also broaden the investigation by extending the inquiry into new areas. Thus, there are further interpretive questions which require examination.

9. Study is required into the most substantial forms of input that are of greatest use in the formulation of public policy. What type of information is of greatest utility in determining policy? What is the nature of the relationship that supports the long term process of implementation? What sorts of structures can be established that facilitate public participation in policy making?

10. Are there approaches which are typical to consultations conducted at various stages in the policy processes? Do consultations initiated at the early stages of problem structuring provide greater opportunity for continuous consultation throughout the process or greater alienation as the process reverts to one internal to the organization?

11. Research is also needed which documents the measurable benefits of effective public participation in terms of more efficient project management, reduced litigation, decreased public backlash, increased support for policy proposals, and political success at the polls.

12. This study avoided the confounding influence of substantive issues and the unique nature of specific policy areas on the structure and impact of consultation on the policy outcomes. More specific investigation is required to ascertain the unique and comparative policy environments of consultations conducted within different policy areas such as the environment, including multiple land use and environmental impact assessment; capital projects, for example, utility corridors or plant sitings; social and economic policy in health care, education, or social assistance; or political issues such as constitutional or parliamentary reform.

13. This study takes the unique perspective of the administrator working within the policy process. Considerable investigation is required into the perspective of citizens on consultation, and whether the process and outcomes were consistent with their expectations. Furthermore, entering into a new era characterized by the wider use of consultation in the formulation of public policy, additional investigation is required into the perspective of legislators and how consultation affects their role and the role of government in a more participative society.

Implications for Senior Administrators

This study raises two key implications for senior administrators who embark on a process of public consultation in support of the policy process. Senior administrators must be aware, first, of the requirement to keep the policy process and the consultative process on congruent courses, proceeding at a common pace. Second, senior administrators also must be aware that effective consultation requires fundamental change in the organization.

As this research has demonstrated, the factors which drive the policy process and the consultation process are completely different. The policy process is driven by the demands arising from the need to solve a perceived policy problem. It is largely a process internal to the organization, responding to the schedule and the policy environment of the organization. The policy process is a decision-making one and, in most instances, there is a time pressure to arrive at a decision within a fixed period of time. Policy decisions must be sensitive to the organizational and political environment and, therefore, they fall within a fixed set of allowable possibilities.

The consultation process, on the other hand, is driven by logistical concerns. Public consultation is often cumbersome requiring complex organization and advance planning. Meeting facilities have to be scheduled, public notifications advertised, and materials circulated prior to meeting dates. Having once committed to a process of consultation, the schedule must then respond to the needs of participants who, as active individuals and for the most part volunteers, need time to make personal arrangements. The schedule of consultation is one which must be predetermined while remaining responsive to the needs of those who are to be consulted. The agenda also becomes the domain of the participants, not necessarily responding to the dictates of the policy-makers. Consultative processes often take on a life of their own, leading in new directions, pursuing new avenues of solution, and evolving in their own time.

There is nothing naturally congruent about the policy and consultation processes. On the contrary, in most cases, the two processes are forced together by a powerful will to incorporate public consultation into the policy process. This unnatural association has its limits, however. The pressures of time or the need for a policy solution which meets certain unstated criteria can separate these two processes despite the will to keep them integrated. If either the policy or the consultative process moves more quickly than the other, it may not be possible for one to be delayed or the other accelerated. In many instances, the policy process is unable to keep pace with a consultative process that is

moving quickly toward policy solutions which have not been thoroughly evaluated by policy-makers. On the other hand, policy processes which necessitate decisions to meet external scheduling requirements such as those imposed by legislation or legislative processes, may not have the luxury of awaiting a consultative process which is mired in an extensive process of relationship building.

These processes may also be separated by their possible outcomes. There may be good intentions in mounting a consultation in support of the policy process. However, as the consultation proceeds and its likely outcomes become apparent, if these outcomes are not within the scope of acceptable alternatives of the policy-makers, then the process has become de-railed. Efforts can be made to convey those preferences in an attempt to get the process back on track, or policy-makers can distance themselves from the process.

The result is a continuous shearing force threatening to rupture the fragile linkages between the consultative process and the policy process. This force can easily overcome the will to continue to keep the consultation and the policy process congruent. Once separated, it is almost impossible once again to reunite these processes. It is under these circumstances that an otherwise genuine consultation becomes a sham. Once the consultation is separated from the policy process, the process becomes little more than public relations in which the public is calmed and placated through their involvement in an otherwise meaningless process. The results of the consultation become lost in the vast corridors of the organization, and policy decisions are the result of the application of pre-existing norms and values rather than a response to new information and relationships.

To maintain the linkage between the two processes, senior administrators must make a conscious effort to hold the two together. There is a tendency among those immersed in the organizational culture to avoid the products of consultation as irrelevant, thus making it easy to continue with the policy process without reference to public input. Senior administrators must ensure that the products of consultation are indeed relevant, and they should arrange for this information to be fed into the policy process in a timely and substantive manner. Senior administrators must also ensure that the scheduling of both processes is congruent and that each is fundamentally dependent upon the other. Finally, they must ensure that these processes are protected and that other intervening events are accommodated into the integrated process or, at least, not allowed to infringe upon their effectiveness or credibility. In short, senior administrators must champion the importance of public consultation in the formulation of effective policy.

This brings forth the second major implication for senior administrators. To use public consultation effectively in the formulation of public policy requires substantial change within the organization. It is the culture and value framework of the organization which mold the policy process and dictate the range of tolerable policy options. To accept that consultation is to become part of the policy process is to accept that the culture of the organization must change. To accept that the values of the community are legitimate is to challenge the traditional values of the organization and profession. To accept that the community can make a contribution to the policy process is to challenge the traditional role of the organization and the relationship which the organization has established with its stakeholders and clients. To accept that change is necessary is to challenge the accomplishments of the organization as inadequate. The effective use of public consultation in the formulation of public policy requires that public organizations hold themselves open to many challenges which can only be accommodated through fundamental change in the organization itself.

The primary change is in the structure of the policy process. Policy processes which are segmented, sequential, linear, and rational will have difficulty absorbing public input. Consultation in this policy structure is solely for the purpose of collecting information, information which can be easily discounted, lost, or ignored in the policy processes of an administrative bureaucracy. As this study has demonstrated, consultation has a much greater contribution to make to the formulation of public policy. However, this contribution can be realized only if new basic assumptions about the role and place of the public in the policy process are adopted. Administrators working within a transformed policy process must accept that the members of the public are not passive, but can articulate their views on issues that affect them. They must accept the primacy of values over rational calculation in the formulation of policy and seek to place organizational values into a societal context, molded by the external environment rather than to attempt to construct an environment unique to the purposes of the organization. This reconstructed approach to policy making takes the view that policy is not a product, but an outcome embodied in the practices of the organization in dealing with its clients. Finally, this approach stresses the use of consultation for the purposes of relationship building, relying far less on the top-down processes of constructing an organizational culture, but more on the development of a shared understanding of the environment including the demands of both clients and legislators and the values of the society in which the organization must operate. Change in the policy process is, therefore, not so much in structure, although that may be necessary to accommodate a more flexible, value-driven approach. The significant change is in the

orientations towards public participation of administrators engaged in the policy process. Senior administrators have a role to play in cultivating changing attitudes among others in the organization.

Change in the structure of policy-making is important, but not as important as change in the way that the organization functions. The most dramatic change is required in those organizations that are captured by either institutional clients or professional organizations. Here the clash between the contending values of the organization or the profession and the community are the greatest. It is also in these organizations that the clients or the profession can bring the greatest pressure to bear upon administrators involved in the consultation to structure the process in such a way as to bound the possible outcomes to those preferable to the client or profession. Senior administrators have an opportunity to utilize public consultation to bring greater balance into the policy process by introducing community values, exposing all stakeholders to the concerns and values outside of the existing policy community, and broadening the range of possible policy outcomes. By adopting a more consultative stance in the formulation of public policy, senior administrators have an opportunity to re-invent the roles, activities, and relationships to accommodate better a changing environment.

Senior managers must ensure that their support for the process of consultation is unwavering. With no natural affinity between the consultative and policy processes, senior administrators must demonstrate the will required to hold these processes together. They must make opportunities to confirm that community values are important to the process, that decision processes are able to accommodate the vagaries of the consultative process, and that information is passed between the two processes accurately and expeditiously. Above all, senior administrators must participate in the consultation process. This lends credibility to the process. However, far more significantly, through their participation, senior administrators are in a position to listen and interact with the public, for not only are senior administrators responsible for the process, they are also responsible for its policy outcomes. They are decision makers, and they must leave themselves open to be challenged, to have their values questioned and to lead the way toward the reconciliation of community and organizational/professional value structures.

Lastly, senior administrators must be extremely cautious regarding the selection of project management. Consideration should be given to the orientation of project management to the public, the policy process, and the use of the products of consultation in policy

decisions. As this study demonstrates, decisions on project management could be among the most definitive in the entire consultation project.

Implications for Consultation Project Managers

This research raises a number of important implications for consultation project managers who want to ensure that consultation has a more substantial impact on the formulation of policy. As this study has shown, administrators involved in consultation have considerable discretion in the structuring of public consultation and, in turn, the structure of the consultative process has considerable impact over the outcomes of that process. Project managers must be aware of the potential risks involved in being associated with consultation, of the impact that the orientations of others on the project have on its outcome, and of the need for inclusion of senior decision-makers throughout the process.

Effective consultation requires challenges to the status quo. This implies risk for the project and for those who participate in it. As this study has demonstrated, consultation can take the form of a single external loop in an otherwise internal policy process, or a continuous consultation in an externalized policy process. If consultation requires change in the organization and constitutes something more than a single loop in the policy process, then the consultative process will be the focus of those challenges, and resistance will be generated from within the organization. On the one hand, consultation can be easy. A consultative process which is congruent with an internal policy process and which adheres to organizational values will receive constant indications of success. It will go smoothly as organizational values are affirmed. On the other hand, an external process will be challenged as organizational and professional values are challenged by the value framework of the community. The process becomes the focus of resistance, its impact increasingly marginalized, and its outcomes possibly ignored.

As a result, the management of consultation projects entails various elements of risk. Many participants of this study spoke of the vulnerability that they felt as a result of their participation in public consultation. They were caught between contending accountabilities to clients and legislators, confronted by senior administrators for being the messenger of information contrary to established understanding, criticized for creating public controversy or for creating or illuminating divisions in different policy camps, and isolated within the organization by those who sought to minimize the potential for change created by the consultation process. Project managers must recognize that these risks emerge largely from the different orientations of administrators within the organization toward the public and

toward the policy process. Addressing these risks means making these orientations and the assumptions which underlie them explicit so that they may be challenged and evaluated as part of the policy process. Project managers must continually seek support for the process within the organization, starting with senior administrators but also including the many others who will be affected by the ultimate policy decisions and whose support will be necessary in their implementation. Consultation projects, therefore, must include activities within the organization which allow the broad participation of staff to allow these different perspectives to be articulated.

Project administrators must also be aware of the orientations of those working directly on the project team. Administrators responsible for the management of consultation projects are often dedicated proponents of the importance of consultation. This commitment is not always a component in the selection criteria for the position and many administrators find their way into consultation roles because of their skills in other areas such as public relations, and their experience in the substantive policy area, in research, or in the management of complex projects. However, regardless of their background, in most cases these administrators become captured by the significance of the process. Consultation processes are implemented in areas which are important to the future of the organization, engaging direct contact with its primary clients and attracting the attention and participation of the most senior decision-makers. There is opportunity for affirmation of the achievements of the organization, and for constructive progress through the discussion of issues of importance among people of ability, bringing new perspectives and new information into the organization. There is the potential for grandeur and spectacle, and the opportunity to make the activities of the organization visible to a wider public. Public consultation has excitement and the promise of action, two characteristics not often associated with an administrative bureaucracy.

Unfortunately, while committed to the process, administrators consistently report that they are not responsible for the outcome of the consultation, and they are less committed to its incorporation into policy. It is these very people who also become the most disenchanted and cynical about the impact of consultation on the policy process. Often their work is ignored, their recommendations shelved, or the process distorted by manipulation or hidden agendas. Consultation inevitably deals with issues of significance to the organization, and thus involves many people who have a considerable investment in the history and traditions of the organization. For these people, excitement and the promise of action can be viewed as destabilizing forces in the bureaucracy and not to be encouraged. Public consultation becomes the avenue to reinforce existing traditions and to explain them

to an attentive public. Similarly, the views of the public can be screened and translated into the language and customs of the organization to support existing initiatives or they can be shown to be ludicrously naive regarding the complexity of the issues under discussion.

Therefore, project managers must be aware of the orientations and perspectives of those working on the project team. As this research has demonstrated, there is considerable discretion allowed to administrators in structuring the consultative process, and the outcomes of that process are substantially dependent upon its structure. Project managers should choose their team members with the objectives of the consultation in mind. Similarly, the project manager should consider how the actions of each team member will place bounds on the outcomes of the consultation through techniques outlined in this study.

Project managers must be aware of the orientations of others in the policy process toward the public and their understanding of the role that consultation plays within that process. The involvement of decision-makers in all phases of the consultation process is critical. Senior decision-makers are at the core of the internal policy process. If there is a tendency for the consultative process to be separated from the policy process, for its outcomes to be marginalized, or for the process to be manipulated, the impact of these events will be more likely to affect the critical decisions made at the core. If the goal of consultation is to reconcile contending value structures, senior decision-makers must be exposed to the consultative process on a personal basis. Project managers should ensure that senior administrators are included in public events where they hear first-hand the views of members of the community and engage in the dialogue necessary to explicate, confront and reconcile contending viewpoints. Policy formulation should not be based upon the idiosyncratic experience of individual policy-makers, however. Project managers should also ensure that decision-makers are presented with continuous and comprehensive summaries of information on the consultative process as it proceeds. If possible, they should be involved in the preparation of summary documents through periodic de-briefings and focus sessions.

Finally, project managers should encourage any opportunity for senior decision-makers to be converted to the benefits of consultation by the enthusiasm and commitment of the project team. The excitement of a consultative process which is building supportive relationships and generating useful and relevant information is infectious. A continuous process of on-going consultation will result only if senior administrators share that excitement. However, project managers must also be aware that the outcomes of consultation are only part of the information used to build policy decisions. To avoid the

disenchantment and cynicism of administrators who expect that their recommendations will be acted upon immediately and completely because they represent the voice of the people, project managers must also ensure that everyone on the project team is well apprised of the decision environment of senior decision makers and the impact which that environment has on policy alternatives.

Implications for Practitioners

Practitioners are those individuals who are called upon to assist in the design and implementation of consultation projects, normally as professional consultants. The findings of this research also has implications for practitioners who want to design more effective consultative processes. The framework presented in this study outlines a number of features of consultation which should be taken into consideration when designing these processes. Practitioners should be aware that the report is not the end of the process, and that there is no one right way to consult the public. They must also ensure that they themselves do not become manipulated by the consultative process.

In many instances, practitioners are hired on a term-certain basis to assist in the design and implementation of a consultative process, usually ending with the presentation of a final report containing the findings and recommendations derived from the consultation. This further supports the perception of consultation as a single external loop in the policy process, producing policy-relevant information to be assessed against the existing organizational and professional value framework. As well, it is the source of considerable cynicism for members of the organization as outside experts are brought into the organization to design the process, creating the excitement of a constructive process, but concluding their activities before any policy decisions are made. The consultations mounted by the participants in this study were structured, for the most part, in accordance with generally accepted principles of fair and equitable consultation practices. The difficult part was not the conduct of the consultation itself, but the employment of the results of the consultation in the formulation of policy. There is an important role for practitioners in the implementation of consultation processes. However, practitioners must become more knowledgeable about the use of public consultation in the formulation of public policy. Organizations require considerable assistance in recognizing the appropriate role of consultation in their specific activities and the types of organizational and attitudinal change which are needed to support the development of a value structure which can be shared among the organization, the professions, and the community.

However, in adopting this extended role, practitioners must also accept that there is no one right way to consult, but that the most appropriate process is contingent upon a number of situational factors. Consultative processes must be designed to meet established policy objectives and the implementation of the process must be continually evaluated against measured progress toward these objectives. Practitioners must recognize that each consultation takes place within a very unique organizational context, which must also be taken into consideration. Practitioners must be aware of the contending accountabilities which bear upon the structure of the consultation process, and they have to be prepared to address those demands. For administrators participating in this study, it is important to note that accountabilities and positions were not necessarily the same. Many senior administrators felt more accountable to clients than to legislators, just as many lower level administrators engaged in program delivery felt more accountable to legislators than to their direct clients. The identification of the primary accountabilities of administrators will provide invaluable information to practitioners regarding the most appropriate structure for the consultation. For example, greater accountability to legislators will result in a consultation process oriented toward political reconciliation of the contending demands of interest groups, while a more client-based consultation will be oriented more toward individuals. Practitioners should also recognize that policy conflicts may be less a matter of contending demands and more a concern of with contending values. Practitioners should be prepared to address value issues particularly in the contending value structures of the organization, the profession, and the community. Consultations can be structured very differently to achieve a reconciliation of values rather than a negotiation of demands. Practitioners must be open to these opportunities and be prepared to provide strategies which can bring about these outcomes.

Finally, practitioners must ensure that they do not become manipulated in the process of consultation. It is relatively easy for administrators to externalize the consultation process from the internal policy process of the organization by contracting it out to a private consultant. By doing so, the project may acquire an air of independence and neutrality and provide a buffer between decision-makers and the public, but it may also become an empty gesture with little impact over policy outcomes. As well, practitioners should also be aware of the constraints which may be placed upon the openness of the process by the decisions of their administrative clients. They must recognize the impact of various bounding techniques employed to direct consultation processes toward certain pre-determined outcomes and they should be forthright in explaining the impact of these decisions to policy makers. No consultation will be entirely free of bounds, nor is bounding necessarily a

distortion of the process. However, in accepting the imposition of bounds on the process, practitioners must consider their eventual implications for policy, the perspectives which will be heard, the alternatives which will be considered, and the voices which will be silenced. A code of practice is required for public participation practitioners, one which is flexible enough to accommodate the wide array of possible consultation situations, but one which also provides clear standards of performance by which practitioners can abide.

Practitioners must evaluate their performance not on their ability to avoid public controversy or to mount a polished process, but on their ability to bring the views and perceptions of the public into the policy-making process. Practitioners must become advocates of the merit and value of consulting the public as the foundation of creating good public policy. Practitioners must understand both the policy process and the consultation process, recognizing their particular characteristics and that, in combination, each consultation becomes unique to that situation. Therefore the role of the practitioner in public consultation is not a passive one. Practitioners must assist administrators to understand the process of consultation and the contribution that effective consultation can make toward the generation of policies which meet technical and organizational requirements and are implementable in the community affected by those decisions.

Implications for the Preparation of Administrators

If the contribution of public consultation to the process of policy formulation is to be improved, this research has a number of implications for the pre-service and in-service preparation of administrators. One of the primary objectives of this study is to inform the practice of administrators. There is no better avenue for informing practice than through education.

The administrators in this study had little exposure to formal training in the concepts or techniques of public consultation. At best, they may have taken a two-day course in consultation or possibly participated in previous consultations on other occasions. As a result, they adopted a common sense approach to structuring their consultations which reflected their own experiences and their personal views of what constituted fairness in the process, what role the public should play in policy formulation and the competence of the public to fill that role. Consequently, it is reasonable to suggest that most administrators will not have given much consideration to the role of the public in their substantive policy area until they are required to conduct a consultation as part of the policy project immediately at hand.

There is a prevailing view that good consultation is running a good meeting, keeping controversy under control, and making pointed reference to quotations from the consultation in published materials regardless of their relevance. Consultation is made to look easy or, more accurately, outcome expectations are not high and, therefore, consultation does not require sophisticated approaches or methodologies. Analysis of the data emerging from consultation is often so contradictory or complex that it lags the decision process and becomes irrelevant. Much of the media coverage of consultation refers to failed or inadequate processes, thus lowering expectations further regarding the possible contributions of consultation.

This research has demonstrated that there is an important role for consultation in the formulation of public policy, and that performance and outcome expectations can be considerably greater. However, this research has also shown that much of public policy derives from the dominance of organizational culture, and that it is difficult to break free from the values and demands of the organization. There is an built-in resistance to change in administrative bureaucracies. Processes which adhere to the values and culture of the organization receive continuing indications of success, whereas, processes which report contending value systems engender conflict and retaliation. Therefore, if performance expectations of consultation are to be enhanced, administrators in existing organizations will be unlikely to see the relevance of such innovations unless they are demonstrated.

Administrators require a broader framework in which to understand consultation and its contribution to policy. They should be provided with a structure which places their consultation activities into a broader context and which makes sense of their experiences as they proceed. Administrators must have the opportunity to make explicit their assumptions about the public, to be exposed to new perspectives on the policy process, and to be offered alternative approaches which include comprehensive consultation models and examples of successful processes. They need new approaches to the process of making public policy in which there is a clear place for the public and mechanisms for their voices to be heard. This must take place both in the pre-service and in-service preparation of administrators.

The academic preparation of administrators should include the perspective of administration as a political activity. This must be addressed, not as usurping the political role of the legislator, but in the broad sense of determining a course of action amid contending opinions and in the absence of an independent ground for decision. Thus, potential administrators must be exposed to a variety of models of policy analysis and formulation

which portray the traditional linear models of policy making as well as non-linear approaches which place more emphasis on values as the determinant of policy choices. Alternative policy processes should be identified which reserve a place for the public and make better use of the products of consultation in policy formulation. Administrators should become familiar with qualitative research techniques as they are the basis of capturing the sense of public consultation. Administrators should also understand the basics of negotiation so that they may engage the public in the resolution of contending interests. Finally, potential administrators must be cautioned of the repressive side of organizational culture and its tendency to stifle change and constructive adaptation.

It is due to the deleterious effects of organizational culture, that in-service preparation becomes most significant. Acculturation and socialization take place within the organization and define the roles, activities and values of administrators working within that structure. Administrators need alternative frameworks of understanding and tools with which to enact new roles, activities and values. It is, therefore, through in-service courses that administrators can be exposed to alternative ways of thinking and acting which can result in the resolution of heretofore intractable problems, prevented by the time-honoured methods approved by the bureaucracy.

To support earlier recommendations regarding senior administrators, in-service training on consultation must be placed in the context of organizational change and development, for the real value of consultation is also manifest within the organization, not only outside of it. Administrators must develop a broad base of exposure to consultative techniques which can be used within the organization as well as with the relevant public. They must understand the impact of the bounding techniques so commonly used in structuring consultation, and the impact which these may have on constraining the range of possible policy options. They must also understand the very different approaches to consultati ר represented by the single loop and continuous models of consultation. Finally, they must be provided with effective techniques and examples for moving the outcomes of consultation into the policy process and maintaining the connections between the consultative and policy processes.

In-service preparation can not be limited to operational personnel and must be extended to policy makers and those involved in implementation. Senior staff must be involved to ensure that their support for the process is unwavering, and that they understand clearly what it is that they are supporting. The methodology used in this dissertation can provide an alternative to traditional forms of in-service training, using informal conversation with administrators experienced in consultation, analysis of active consultations to identify

themes and issues, and shadowing of those involved in consultation projects to understand the practical aspects of effective processes. Of course, all project staff must fully participate to reduce the possibility of friction between the knowledgeable and open-minded, and the uninformed and intransigent.

The comprehensive preparation of administrators in the role of public consultation has significance far beyond the design and conduct of an effective consultation project. It is a vital component of the re-invention of government and the way that large organizations do business. These initiatives represent new attitudes toward participatory management styles. They represent new forms of organization which rely less upon values generated within a stagnant organization and more upon the development of adaptable organizations which are responsive to the dynamic communities in which they function. They offer new opportunities to explore the changing responsibilities of administrators, and their evolving relationships with legislators, clients and other administrators. They provide opportunities to respond to the growing demand for greater public involvement and greater public ownership of decisions made on their behalf. Finally, through the process of preparing administrators to use consultation appropriately, there are opportunities to explore new perspectives on the role of government and the function of administrators in a democratic society.

Implications for Democratic Government

It is a basic assumption of democratic thinking that the legitimacy of government derives from the consent of those who are governed, and that key decisions are made either privately by individuals, or publicly by a democratic process. It is not normally accepted that decisions regarding matters of public interest should be made by anyone who is neither authorized to make those decisions, nor democratically accountable for the results of those decisions. However, in a large, complex society, it is unreasonable to expect that individuals can give consent to public decisions of consequence in anything but broad terms. Therefore, we live in a form of representative democracy in which our representatives are authorized to act on our behalf, and to be held accountable for their actions at the time that their authorization is to be renewed. In exchange, we ask that our representatives be responsive to our needs and demands. This study raises a number of implications for the nature of democratic government including the nature of a responsive government, the democratization of the policy process, and the political role of the administrator.

This research suggests that there is a place for public consultation in the formulation of public policy. To be responsive, a government is obliged to act in a manner consistent with the interests of those represented, unless there are good reasons to do otherwise, and in that case, those reasons must be communicated. This suggests that the public must be able to express their interests and have access to a forum for that expression. To be responsive, therefore, institutional arrangements must be available for interests and responses to be conveyed. One implication of this study is that on-going consultation provides the institutionalized structure for the exchange of information between the governors and the governed.

However, the more serious implication is the impact that adopting such a strategy has for our traditional views of the legitimacy of the legislator as our representative. Representatives are authorized to act on our behalf and held accountable for their actions when they then ask again for a mandate to continue. This empowers our representatives to take action which they see as necessary to address issues of the public interest, some which may be unpopular but necessary to accomplish wider objectives, and makes them accountable for the totality of their actions rather than each individual component. The requirement for on-going consultation reduces the clarity of that authorization, for the public can conceivably authorize each action. Further, it confuses our notions of accountability, for legislators can be made accountable for each piece and not the whole. This same rationale supports the right of electors to recall their representatives should they be dissatisfied with their performance, and constrains legislators from voting in accordance with their conscience on matters of moral or ethical importance. It also requires a level of competence, commitment and involvement by the public commensurate with the enhanced responsibility that they have undertaken.

Clearly, while public consultation can play a vital role in democratic government, it is unlikely under current conditions to supplant entirely the role of the legislator as representative. However, public consultation does have a meaningful role to play in the democratization of the policy process. Within existing administrative bureaucracies, the relationship between public agencies and the public is often alien to effective public participation and to the development of acceptable policy. As this research demonstrates, the process of consultation is driven by the values of the organization not the public that is being consulted, and is imposed upon the situation, directing participants toward conclusions which they might not otherwise support. The interests expressed by the public are integrated into policy only to the degree that they are represented in internal processes, most frequently by administrators who are neither directly authorized nor accountable

through any democratic process. Their actions are driven by the culture of appropriateness and by assumptions about the policy process as being rational and instrumental. Policy formulation in a contemporary administrative bureaucracy becomes oriented toward problem solving rather than toward the creation of an environment in which problems can be solved by those best able or best motivated to do so.

Thus, as a result of this research, it is important that we reconsider our assumptions of the process of governing and the role of the public in that process. We must accept that the public is not passive, and that participation must be valued in its own right. We must also accept the primacy of values in policy formulation and that organizational values must be placed into a societal context. Governing has been most often a top-down process directed toward re-election, and occasionally a bottom-up process of civil protest. However, governing can no longer be considered simply a power struggle of "I say, you do", but a dialectical process in which policy is transformed in its implementation. Public policy, and thus governing, must be understood as outcomes, not pronouncements.

This re-thinking of governing a democratic society challenges the underlying power relationships of the policy process. Policy making can no longer be exclusively top-down, linear, and oriented toward the resolution of specific problems. It must become aligned with the development of a shared understanding of what we agree upon, what we value, and how we view the possibilities and challenges that are before us. This conception challenges the traditional roles of legislators and administrators, and requires a break from previous patterns of accountability and vulnerability. This is where the difficulty lies.

Democratizing the policy process politicizes the role of the administrator. However, this politicization is not in the partisan sense of being bound by an ideology and an allegiance to organized political perspectives. On the contrary, the administrator in a democratized policy process is obliged to return to the community as an active participant. The role of the administrator is to identify alternative courses of action in the presence of conflict and the absence of an independent ground for judgment. The administrator becomes a mediator, reconciling the contending demands of legislators and clients and the values of community and the organization. The role of the administrator is to act in accordance with the public interest, and to be guided by the exercise of sound professional judgment and the instruction of democratic processes. The administrator is therefore obliged to seek out the public interest and to act upon that expression of public will. A democratized policy analysis aims to bring individual preferences into the determination of public policy through the process of consultation. It forms the basis for a democratic process of authorizing

administrators to act, and causing them to be accountable for their actions in a democratic forum. It does not supplant or reduce the democratic role of the legislator, but instead reinforces it by providing alternative channels of democratic accountability. A democratized policy process and administrators who act politically are, therefore, the essence of a government which is more responsive to the democratic will and to the public interest.

Summary and Reflections

This chapter has reviewed the critical findings and conclusions derived from the research, identified a program of further research, and outlined a series of implications for administrators arising from the findings of this study. This research suggests that senior administrators must be cognizant of the possibility that the consultation and policy processes may separate and can only be held together by a powerful, conscious will to incorporate public consultation into the policy process. Senior administrators must also be aware that effective consultation requires fundamental change in the organization to allow for a reconciliation between the value framework of the organizational and professional, and that of the community.

Challenging value frameworks implies resistance and retaliation. Therefore, project managers must be aware of the personal and organizational risks associated with being involved in public consultation. As the architects of the consultative process, they must also be aware of the orientations of others in the process toward the public and their role in policy formulation. Project managers should be aware as well of the need to include senior decision-makers throughout the process in order to encourage their personal participation in the direct dialogue and exchange necessary to an effective consultation process.

The design and implementation of consultation projects often involves professional public participation practitioners. In order to design more effective consultation processes, practitioners must continue the process beyond the final report and take a more active role in the integration of the outcomes of consultation in the policy process. They must be aware that the particular circumstances of each policy situation require that each consultation must be unique, and that there is no one right way to consult the public. They must also ensure that they themselves do not become manipulated by the consultative process. Consequently, it is necessary for a code of practice to be established which will accommodate the range of possible consultation requirements but still provide standards of performance to guide the activities of practitioners.

Reflections on the Role of Public Consultation

Underlying this study of the role of public consultation in the formulation of public policy is a steadfast belief in democratic principles and in the right of all citizens to have their voices heard in the decisions that affect them. It is a natural extension of this belief that our preferred choice of government should be that of a participative democracy in which decisions of substance are made by those citizens and not by a removed and unresponsive government.

However, this is not the form of government that we have chosen for ourselves. We have chosen a representative democracy in which we select individuals to make decisions on our behalf and in accordance with our best interests. We, the citizenry, make only a few decisions, the most significant of these pertaining to the selection of our representatives in relation to the issues upon which they choose to stand for election. We are asked occasionally to determine major issues through referenda, and somewhat more frequently we are asked for our opinion through formal public consultations on issues of public policy. However, by and large, any contemplation of a participative democracy is reserved for letters to the editor, call-in talk shows and, of course, civil protest.

The technology is available to sit before the evening news and exercise our democratic rights by voting on the issues of the day with the touch of a button on the controls of our interactive television. Our age, gender, educational attainment, place of residence, occupation, income level, previous voting pattern, and recent viewing choices can be instantly compiled into an elaborate mosaic of political preference far richer than would be provided by any ballot box or the most extensive process of public consultation. However, it is doubtful that this form of direct participation in determining our affairs would provide a better form of government. It is responsive to the preponderance of public opinion. However, there is much more to effective and responsible government than that. We expect leadership from our government and this creates a fundamental tension in our conceptions of democracy.

People have a right to be involved in the decisions that affect them. However, the issues under consideration are often sophisticated and challenging. In many instances, the general public is not sufficiently competent to participate in these decisions. It is not sufficient to suggest that if the public were educated, they could participate more effectively in the decision making process. Despite efforts to bring the public into the making of policy, an enormous apathy prevails among the public, primarily deriving from a desire to get on with

their lives in a highly individualized and competitive world. This individuality also creates a fragmented public, laced with contending values, energies, and motivations. It is often legitimate to question the ability of the public to articulate a congruent and consistent position on specific issues. The role of government is to adjudicate on these issues and to choose directions which are consistent with the best interests of those who are governed.

Thus, we choose governments to provide us with leadership. However, that leadership is frequently lacking. Our leaders fail to voice their vision, or the values and principles which guide their decisions. Governments are permeated by special interests which have the ability to persuade or extort decisions which are congruent with those interests alone, often at the expense of the broader public interest. Important voices are silenced in the consideration of policy issues by powerful voices strengthened by organization, finance, or traditional linkages of political support. Thus, government, for many, is perceived as unresponsive to their needs and alien to their everyday lives. Big government, big unions, big corporations are all code words for organizations which are impenetrable to common people who are powerless to influence their activities. Yet, these same people are constantly having their worlds defined by these organizations, often in incomprehensible, conflicting and painful ways. The leadership of government, therefore, is to be endured, avoided, ignored, or subverted, if possible.

Government remains an important component of our society. However, society needs leadership in government, and deserves governments which are responsive to the needs of society. We need those among us with vision and drive to rise from our ranks to create the environment within which we can collectively and individually fulfill our dreams and goals. We need people to make decisions, to weigh various points-of-view, to seize opportunities among them that may not be evident to all, and to bring the creativity and courage necessary to the resolution of intractable problems. This is not always a question of balance or compromise. On the contrary, leadership must be based upon a firm foundation of values which cannot be compromised. It is these which form the basis upon which we choose our leaders, and the basis upon which we evaluate their performance when time comes to choose again. Therefore, our leaders must enact their vision while also representing the values of the community whose interests are affected. Leaders must be assured that doing so, their actions do not stray beyond the bounds of tolerance of the community.

The tension between leadership and responsiveness has increased substantially as we watch governments world-wide struggle with a mounting crisis of confidence, which leads to calls for the fundamental re-invention, if not the out-right abolishment, of government. At

the same time, the challenges facing our society are becoming increasingly complex, requiring the strength of a collective response. As technological solutions become more pervasive, we are confronted with many more questions of ethics which in themselves are becoming more complex as we confront the foundations of value systems and succumb to the compromise of intractable moral dilemmas. Thus, it is easy to lean so far towards responsiveness that government becomes buffeted by the winds of public opinion, or to play to a populace so starved for leadership that they endorse dictatorial action. However, it is possible both to provide leadership and to be responsive, while compromising neither.

Public consultation is an act of leadership. To consult in the formulation of public policy is not the surrender of power to the vagaries of a fickle and ill-informed public. It is the pursuit of a context for policy and the support necessary to make policy a reality, meaningful to the daily lives of the individual citizens and responsive to their needs. Consultation is a fundamental component in the re-invention of government and it is the key to recapturing public confidence. It provides the basis for creativity, courage, and the moral strength to confront the major issues of our time. Consultation engages people in the debate on critical issues and creates the opportunity for people to define for themselves what is important within their communities.

The leaders that we seek in our communities are those who can harness the creative energy generated through effective consultation and who can channel the outcomes of the consultative process toward constructive public policy. Public consultation must not be allowed to become a sham or used as a smoke screen, a manipulation, a public relations exercise, or an abrogation of the responsibility to decide. Effective consultation is a necessary component of contemporary leadership and the essence of the continuing evolution of democratic government.

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University of Alberta
Edmonton
Canada T6G 2G5

Department of Educational Administration
Faculty of Education
7-104 Education Building North Telephone (403) 492-3741

Appendix A
Letter of Request and Information Sheet

May 5, 1992

«name», Deputy Minister
«department»
«address»
Edmonton

Dear «name»;

In completing a Ph.D. at the University of Alberta while on leave from Alberta Career Development and Employment, I am conducting research on the process of public consultation in the formulation of public policy. The focus of the study is on the approach which individual administrators take in their efforts to secure direct public input on specific, identifiable policy problems. The objective of this research is to develop some useful and relevant information for administrators who are faced with the challenges of implementing an effective public consultation process.

I am interested in interviewing a number of people who have been engaged in designing and conducting various forms of public consultation. In order to compile a pool of participants from which to select, I would appreciate the assistance of members of your department in identifying:

a) recent public consultations completed within the past two years, currently on-going or in the planning stages; and
b) individuals who have held primary roles in the design and conduct of these consultation processes.

Brief information sheets are attached for each consultation identified, which requests some preliminary data about these consultations.

The information collected will, of course, remain confidential, and any further participation by those named will be entirely voluntary. This research is conducted in accordance with University's Ethics Review Guidelines, and under the supervision of Dr. Myer Horowitz, Professor Emeritus of Education. Should you require any further information regarding this request or the research in general, please do not hesitate to contact me at 492-4909 (University) or 435-7887 (Home).

I would appreciate your response by May 22, 1992. Thank you for your cooperation.

Sincerely;

Ian Montgomerie

c.c. Dr. M. Horowitz

Information Sheet

(Complete one sheet for each consulation)

1. Purpose of the consultation:

2. Persons in the primary roles of designing and conducting the consultation:
   a) Phone:
   b) Phone:
   c) Phone:

3. Consultation mechanisms (Check as many as appropriate):
   [ ] Open public forums (open discussion)
   [ ] Open public hearings (prepared submissions)
   [ ] Interest group meetings (identified stakeholders)
   [ ] Focus groups (facilitated small groups)
   [ ] Public opinion surveys
   [ ] Solicitation of written comments through public advertisement
   [ ] Other (Please specify) _____
   [ ] _____
   [ ] _____
   [ ] _____

4. Is the consultation process complete?
   [ ] No, process in planning stages.
   [ ] No, process still underway.
   [ ] Yes, results being compiled.
   [ ] Yes, final report submitted.

5. Is there any documentation on the consultation which can be made available to the researcher, either in published form or in confidence?
   Please give details:

Please return by Provincial Courier to:
Ian Montgomerie, Dept. of Educational Administration, 7-104 Education Bldg. North, University of Alberta, T6G 2C5

Appendix B

GUIDE FOR PILOT INTERVIEWS

June 10, 1992

I am conducting interviews with administrators who have been involved in public consultation. It is their insights I am after, not the application of theory.

I would like to tape the interview if it is **alright with you**, only because I don't want to miss anything. **This conversation is strictly confidential** and the tape will remain in my possession exclusively. **Your name will not be used** in any documentation. I will be **pleased to turn the machine off** at any time, just ask. **Is this ok?**

I would like to hear how you understand public consultation. Would you feel more comfortable just talking generally around the subject (A) or would you prefer to discuss a specific consultation that you are familiar with (B)?

(A) 1. From the point of view of a public administrator, when I speak of public consultation, what comes to mind?

2. What are the significant considerations in consulting the public?

(B) 1. I want you to tell me about public consultation, and I think the best way to approach it is to **tell me about a specific instance** in which you were involved in the design and just talk about it.
For example:
   a) What were you trying to achieve in the consultation?
   b) Who was involved (who was the "Public", Why those and not others)?
   c) How did you go about the consultation?
   d) How were the results used?

2. What effects do assumptions about the public have on the actions of administrators in public consultation?

3. Is there anything else that comes to mind in thinking about public consultation?

4. Would you mind if I came back to talk with you more about this?

5. Is there anybody who you might recommend I talk to?

Appendix C

GUIDE FOR CORE INTERVIEWS

August 4, 1992

I am interested in getting your understanding of the role that public consultation plays in making of public policy. I'd like you to relate your comments to the specific consultation that you were involved with. Generally, we can start with some background information first, then focus on the policy making aspects, and conclude with some of your general impressions on public consultation.

With your permission, I would like to tape the interview, so that I can verify my notes later. **This conversation is strictly confidential** and **your name will not be used** in any documentation. The tape will remain in my possession exclusively and I will be **pleased to turn the machine off** at any time, just ask. **Is this OK?**

A. Let me first get some **background information**
   1. What was it specifically that you were trying to accomplish in setting out on the consultation -- Why did you want to consult the public? What results were you expecting?
   2. How did you determine who was the public? *(Why those and not others?) (Who made that determination?)*
   3. Briefly, how did you go about the consultation?
   4. Did you attend any of the sessions?
      a) If you did, (or if you had,) what would you be listening for? (Prompt for majority *consensus, or convincing argument.*)
      b) Is that what you expected to see in the reporting on the consultation?
      c) What other observations did you have about those sessions and their impact on policy making?
   5. Did you consider using any other techniques to get public input?
      a) Would you have considered conducting a public opinion poll? (*Why not? What would you gain from that?*)
      b) How about setting up an advisory panel? (*Why not? What would you gain from that?*)

B. Lets talk now about the part which the consultation played in **policy making.**
   6. Generally, what kind of process was in place for making policy decisions in this area?
   7. How did the public consultation fit into that process?
   8. Did you have specific questions in mind that you wanted answered through the consultation?
      a) How were those questions determined?
      b) Were the answers relevant to setting policy?

C. In terms of **where the policy decisions sit today**:
   9. In what ways was the consultation useful?
   10. What kinds of problems did it generate?
   11. Were there aspects which were destructive in any way?
   12. What would you have done differently?

D. Let me conclude with a few more **general questions**:
   13. We're bureaucrats. Is there a difference in how we view the value of public consultation compared with how our ministers might view it? Can you give me an example? (*Probe: Should there be a difference? Is the role of consulting the public different for politicians that for administrators?*)
   14. There may be as many as 100 Provincial Government consultations going on across the Province right now. In your opinion, are the results are generally worth the cost and effort in making better public policy?
   15. Finally, from your experience, what one piece of advice would you like to pass on to administrators responsible for organizing public consultations?
   16. Is there anything else that comes to mind in thinking about public consultation?

Wrap-up
   17. Would you mind if I came back to talk with you further about this? (Get a card!)

Appendix D

GUIDE FOR CONFIRMATORY INTERVIEWS

November 10,1992

I am looking at the experiences of provincial administrators and their understanding of **how the results of public consultation are brought into the formulation of public policy.** The research so far is based upon interviews with **20 public administrators** engaged in recent consultations and drawn from **staff and executive functions** in a number of departments and agencies. It is apparent that **most consultations have been conducted in a technically competent manner**. However, the difficulty seems to be **incorporating the results into policy.**

With your permission, I would like to tape the interview, so that I can verify my notes later. **This conversation is strictly confidential** and **your name will not be used** in any documentation. The tape will remain in my possession exclusively and I will be **pleased to turn the machine off** at any time, just ask. **Is this OK?**

Policy Process and Consultations Objectives

I would imagine that the results of consultations pass across your desk as part of the policy making process.

1. What part does consultation play in policy making?
2. Why do we want to consult?
3. When is it best to consult?

Hierarchy of Accountability

4. How are we as administrators to relate to the people with whom we are consulting and the political decision makers? (Bureaucracy, profession?)
3. Do you find that the results of consultation depend on who conducted them?

The Accountability Squeeze

5. How does the conflict in accountability affect administrators?

Structuring the Consultation Process

6. How do administrators respond?

Relationships

7. Much later on, how do consultations affect the relationship with the public ?
8. Why are we tending to go to independent bodies, boards, etc. for consultation?

Wrap-up

9. If you had one piece of advice to give to administrators responsible for organizing a consultation, what would it be?
10. Is there anything else that comes to mind when you think about public consultation?