

# Research Policy Nexus

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## Research Questions

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### Introduction

The Department’s Five Year Strategic Plan 2012-2017 states that:

• “we must use our publicly funded resources wisely and make open and transparent decisions based on solid research and best practice” (page 7)

• “we will use data, evidence and evaluation to inform planning and practice” (page 7)

These commitments raise a number of questions, about the relationship between research, policy (decisions) and practice.

This paper considers aspects of the relationship between research, policy and practice. The purpose of the paper is to inform ongoing development of the Department's Policy Framework and the policy format guidelines with a view to facilitating the policies affecting the work of schools being better informed by research.

We examine what policy is, different types of policy (or policies), and the nature of the policy process. We examine the relationship between policy and research and argue that while research should not be the sole basis for policy, that research should inform policy positions. Policy makers should strive for impartiality in policy development – ensuring that no important considerations bearing on that policy are overlooked. Policy development should involve reasoned scrutiny invoking a wide variety of views and outlooks, so as not to overlook any important considerations.

Some writers claim that quantitative evidence (gathered from randomised control trials, or natural experiments) is more valuable than evidence gathered from qualitative methodologies. We will argue that there is no basis for such hierarchies. Different kinds of research methodologies and different kinds of evidence are suited to answering different kinds of research questions that policy makers might reasonably want to ask. Evaluation of policies should draw on a range of methodologies - quantitative, qualitative and philosophical - depending on the questions asked. The paper examines the best ways of communicating the Department's policy positions.

Following are definitions of key terms used in this paper.

**Policy:** A set of proposals about what to do.

**Research**: the creation of new knowledge or the use of existing knowledge in new creative and systematic ways so as to generate new concepts, methodologies and understandings.

**Evidence:**  one or more reasons for believing that something is or is not true. (Cambridge Dictionary online). Research can uncover evidence for or against a particular view.

**Evaluation:** the making of a judgement about the value of something using criteria governed by a set of standards.

**Consultation:** seeking counsel from; asking advice of; having regard for a person’s interests in making plans

### What is policy? What are policies, and policy documents? What are the different types of policy, policies and policy documents?

“Policy” is a term that is used often and means different things in different contexts. This first research question seeks to address what this means for the NSW Department of Education and Communities, particularly schools for the purpose of clarity in a proposed policy development framework.

Easton ([1953, p. 10](#_ENREF_10)) defined policy as ‘the authoritative allocation of values’. Bob Lingard ([2011](#_ENREF_21)) suggests this remains a useful definition, but needs some elaboration and extension in the context of the impact of globalisation on education policy.

The Australian Macquarie Dictionary defines policy as ‘*A definite course of action adopted as expedient or from other considerations’* and *‘A course or line of action adopted and pursued by government, ruler, political party, or the like.’* ([2009](#_ENREF_6)).

In the NSW Department of Education and Communities (DEC) context the former describes what could be described as ‘small p’ policy or operational policy, for example the *Enrolment of students in NSW Government schools* policy, and the latter as ‘big p’ policy or public policy (such as strategic directions, State government plans and Directives and the legislative framework). Similar to other jurisdictions, NSW DEC policies are developed in response to two distinct drivers: law and government action. So here, the ‘big p’ and ‘small p’ are linked and influence each other ([adapted from Ball, 2008, p.184](#_ENREF_3)).

The policy site for Sydney University describes a practical interpretation on good policy:

‘Above all, good policy is a tool which makes administration easier, and allows people to get on with the organisation’s core business more efficiently and effectively.’

<http://sydney.edu.au/legal/policy/what/index.shtml>

The focus of this paper is the operational policies that affect the work of public schools in NSW.

As defined currently for DEC in the *Policy Documents: DEC Requirements policy*: ‘A policy states the requirements and objectives of the organisation and defines mandatory courses of action and responsibilities for staff for compliance in delivering on these requirements and objectives.’

Taking cue from policies being tools which make administration easier, departmental policies are part of the normative framework (or authoritative allocation of values) in which schools (teachers and Principals) make decisions locally. This aligns with an environment of increased local decision making under the Department’s ‘big p’ policy reform of Local Schools, Local Decisions.

(<http://www.dec.nsw.gov.au/about-the-department/our-reforms/local-schools-local-decisions/reform-agenda/making-decisions>)

‘A streamlined state office will determine policies and guidelines and a new support model will provide educational services close to schools at locations across the state.’

The South Australian Department of Education and Child Development defines their operational policies in a way that perhaps better reflects current NSW directions: ‘Policies give effect to the vision and directions of the government and guide the whole direction and culture of the department. They must be understood, complied with and implemented across DECD sites.’

Current NSW Department of Education and Communities policy definitions

|  |  |  |
| --- | --- | --- |
|  | Types | Examples |
| Reforms and Strategic Directions (sometimes referred to as big ‘P’ policy) | National, State, Departmental | *Local Schools, Local Decisions*  *Great Teachers, Inspired Learning* |
| Policy | Operational policies | Aboriginal Education and Training Policy |
| Policy/ Implementation Documents | Two types:  Procedures  Guidelines | Aboriginal Education and Training Policy: An Introductory Guide |
| Related information |  | Complementary policies/procedures  External links and background information |

Queensland Department of Education, Training and Employment use the term ‘policy instruments’ as opposed to ‘policy documents’. This is useful when there is increasing publication of guidance in digital form rather than documents (e.g. School sports (correct term to be added). Queensland’s policy instrument framework document provides definitions of many common policy terms and guides their usage.

Section 23 of the NSW Government Information (Public Access) Act (GIPA) defines policy documents more broadly. This definition should be considered in context of the intent of the GIPA Act for an open and accountable government. Although any guidance published by the Department comprises a policy document under GIPA (e.g. legal bulletins, memorandum and Executive directions) the primary purpose of policies is to guide work for departmental staff. Anecdotal feedback from schools is that the current definitions of policy documents (and in particular procedures and guidelines) can create confusion about what is mandated and what is not and how to find information.

### What is the range of models of the policy process (e.g. cyclical, linear) and the advantages and disadvantages of each?

Development of Policy and policies is a complex process, as reflected in a range of models for approaching the policy process nationally and internationally. Some examples include:

Linear models(e.g. policy development, implementation and evaluation) reflect a linear progression that aims to clarify and explain the complexity of the policy process model through stages of policy development. For example, John Kingdon ([1995](#_ENREF_18)) develops a six step linear model:

* Observed problem
* Perceived cause
* Policy goals to address causes
* Theories about potential interventions to bring about change in causes
* Intervention Design
* Outcome of program

Such linear models have the merit that the policy process is conceived as occurring in different stages, or steps, that follow one another from beginning to end. This conceptualisation is useful in that it facilitates planning of policy development, implementation and evaluation.

Cyclical Models*:* The notion of a policy cycle is about where and how policy is made and remade in different contexts. Two types of cyclical models can be distinguished: streams and networks.

*Streams models* are concerned with how issues get into the policy agenda and how proposals are translated into policy. There are many variations on streams models. Exworthy ([2008](#_ENREF_12)) suggests that there are three different streams that intersect: problems, policy and politics.

* Problems might be brought to the agenda by key events, publication of ‘evidence’, and feedback from current policies.
* The policy stream highlights the implementation of policy which must meet a minimum threshold of technical feasibility, congruence with dominant values and anticipation of future constraints to the strategy being proposed.
* The politics stream “refers to the lobbying, negotiation, coalition building and compromise of local, national and international interest groups and power bases.” ([Exworthy, 2008, p. 322](#_ENREF_12))

Networks models propose that the policy process is a combination of networks of stakeholders that are motivated by their own interests and which interact with other networks of stakeholders.

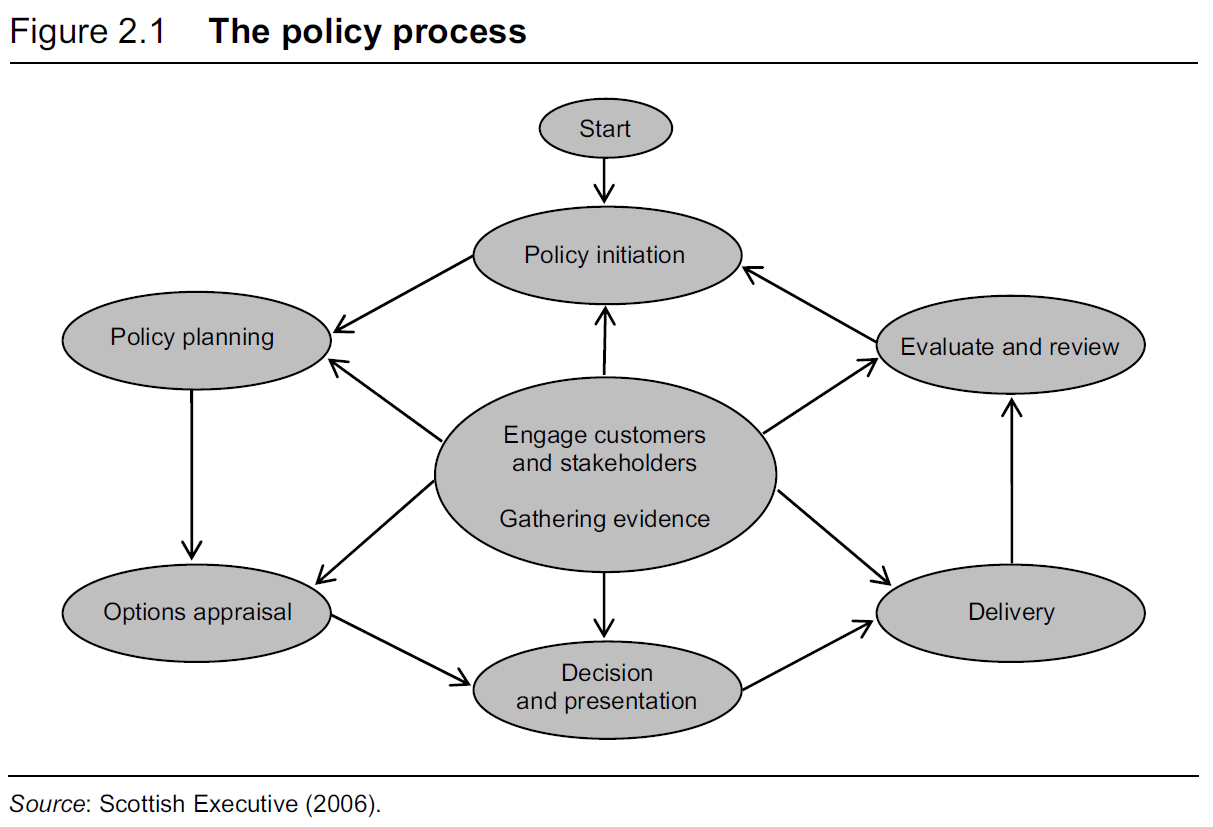
There is extensive discussion of the types and applicability of various models in policy analysis available in the literature. The Australian Policy Handbook ([Althaus, Bridgman, & Davis, 2012](#_ENREF_1)) provides a critique of some of the different models and proposes a cyclical approach as a framework. Each stage is expanded in the book, although the complexity of policy analysis is emphasised throughout.

The merit of cyclical models is that they take account of the complexity of the policy development process. The policy process is not simply a matter of implementers following a fixed policy text and “putting the Act into practice” ([Bowe, Ball, & Gold, 1992, p. p.10 p.10](#_ENREF_4)).

*A hybrid Model*

In examining health policy in Norway, Strand and Fosse ([2011](#_ENREF_29)) suggest that an approach that acknowledges and draws on different models of policy developments are more likely to be effective. “The Norwegian case illustrates the necessity to include more comprehensive or combined models to understand policy-making processes and is an attempt to provide an input to such a debate.”([Strand & Fosse, 2011, p.381](#_ENREF_29)) They found that both models are apparent in the Norwegian health interventions.

For the DEC, this is consistent with developing a ‘culture of consistent improvement’ described in the NSW DEC Evaluation policy. The complex legislative environment, multiple policy intersects that affect the work of schools. A combined model that shows the complex environment and multiple intersections of policies that affect schools could provide a policy process that is dynamic and more responsive to the changing needs of schools.

Brian Head suggests a model of the policy process that could be seen to combine the advantages of stage, cyclical and network models.

As a visual reference the Head model shows the complexity of the policy process but guides the eye to a systematic approach to addressing a policy issue.

A strength of this model is that it places research (understood as systematically gathering evidence and engaging in consultation) at the centre of the model. Evidence drawn from research informs each stage of the policy process.

The model is a potential starting point that could be adjusted to capture processes for a NSW DEC policy development framework. It captures stages that have been identified previously by policy development officers and shows that there are multiple catalysts for policy adjustments to take place.

The Australian tertiary sector appears well established in developing educational policy frameworks that draw on cyclical models. Examples of models that could be considered and adapted include UTS and University of Melbourne.

### What is, and what should be, the relationship between policy and research?

Some writers suggest that policy (and practice) should be based solely on solid research findings about “What Works”. Evidence-based policy has been defined as an approach that “helps people make well-informed decisions about policies, programs and projects by putting the best available evidence from research at the heart of policy development and implementation.” ([Davies, 2004, p.3](#_ENREF_9)).

According to Davies, a good policy process uses the best available evidence to develop policy. Where the evidence is partial or inconclusive, promising policy options should be tested through pilot programs. These pilots are then evaluated so that lessons are learned during an iterative process of policy development and implementation ([Nutley & Homel, 2006, p.7](#_ENREF_23)).

Against the “evidence-based” view, Lingard ([2011](#_ENREF_21)) suggests that research is only ever one ‘contributing’ factor in both policy content and processes, as well as in professional practice. He suggests the descriptor, ‘evidence-informed’, seems a much better way to capture the research/policy relationship. The evidence-based policy making construction implies ‘too tidy and rational an image of policy-making as some kind of clinical and objective operation’.

In*Three lenses of evidence based policy* Brian Head ([2008](#_ENREF_16)) argues that policy decisions emerge from *politics, judgement and debate*, rather than being deduced from empirical analysis. Policy debate and analysis involves *an interplay between facts, norms and desired actions*, in which *‘evidence’ is diverse and contestable.* He suggests that three types of evidence/perspective are especially relevant in the modern era – systematic (‘scientific’) research, program management experience (‘practice’), and political judgement. There is not one evidence base but several bases. These disparate bodies of knowledge become multiple sets of evidence that *inform and influence* policy rather than determine it.

Paul Brock suggests consideration of a range of evidence to inform policy and practice including:

* Scholarship – “the ideas, speculation, imagination, creativity, innovation and so on, generated and articulated by thinkers who would not fit into the mould of evidence-based researchers”
* Wisdom – “distilled from the reflection over their experience by excellent teachers, principals, and other school leaders”
* Strategic Nous – “ that down to earth, insightful, flexible exercise of common sense, fully aware of the complexities of the relevant context ([Brock, 2013](#_ENREF_5)).

Vickers ([1994](#_ENREF_31)) outlines four types of connections and utilisations by policy-makers and politicians of research knowledge: research as warning of problems; as guidance for possible policy options; as enlightenment, which can lead to the reframing of policy problems and approaches; and as mobilization of support for a politically desired policy option. Research also enables a reasoned consideration of the pros and cons of policy options in relation to alternatives. Commenting on this, Lingard suggests that research-based knowledge affects policy gradually by shaping how decision makers think about a problem and decide on possible solutions. Policy-makers may not even be aware of the way such research over time has re-shaped their assumptions ([Lingard, 2011](#_ENREF_21)).

The approach taken in the *Australian Policy Handbook* appears compatible with this approach. The Handbook suggests that the goal of Evidence-Based policy is to improve policy discourse by illuminating contentious questions, identifying the strengths and limitations of supporting evidence, and elucidating the political implications of contending positions ([Althaus, Bridgman, & Davis, 2012](#_ENREF_1)).

A number of writers seek better communication and collaboration between the research sector and the policy sector, as a means to greater evidence informed policy ([Edwards & Evans, 2011](#_ENREF_11); [McArthur & Winkworth, 2013](#_ENREF_22)). Policy makers (and practitioners) can also be researchers, as well as utilisers of research. *It would be wrong simply to see both as merely inert recipients and translators of research*. An increasing number of policy makers are also researchers, or have been researchers.

**The intersections between Research – Policy – Practice**

What is the relationship between research, evidence and practice?

Nutley and Homel ([Nutley & Homel, 2006, p. 9-10](#_ENREF_23)) suggest that evidence is always inextricably intertwined with the actions, interactions and relationships of *practice*. Thus, the neat separations of researcher/ practitioner, evidence creation/ dissemination and knowledge/ implementation have each received sustained criticism.

Cherney and Head ([Cherney & Head, 2010](#_ENREF_8)) identify a practical framework of principles and processes which assist in aligning efforts to improve knowledge of policy and program effectiveness:

* Communication – disseminating information and generating influence, enhancing the professional knowledge bases of policy-makers and practitioners.
* Capacity – two levels: general and specific.

1. General – generic capacities needed to support evidence based policy and practice processes
2. Specific – capacities and funding required to support the uptake of particular innovations.

* Competency – individual skills essential to the implementation of evidence based policy and practice.
* Compatibility – harmony of principles underpinning an evidence-based policy or practice and organisational ways of operating and not only individuals.
* Commitment – although an evidence-based approach is endorsed, this doesn’t mean individuals within the agency actually support the new model.
* Collaborations – leveraging the varying capacities and expertise of participating agencies that help enhance the implementation of evidence-based approaches.
* Creativity – providing space for innovation and experimentation
* Compliance – processes to monitor uptake and adoption within relevant professional contexts.
* Champions – evidence based policy and practice is not self-sustaining. There need to be individuals or groups who can help drive the process.

### Does the appropriate relationship between research and policy vary with the type of policy or policies?

The complexity of a policy position or driver will affect the degree, variety or extent of research that could be undertaken to inform review or development. It depends on the question or problem and this is explored further in section 6 – evidence hierarchies.

Policy makers’ engagement with research has the potential to improve any policy. As previously noted policy makers may make use of research of research knowledge as warning of problems; as guidance for possible policy options; as enlightenment, which can lead to the reframing of policy problems and approaches. Research also enables a reasoned consideration of the pros and cons of policy options in relation to alternatives. The quality of any policy may be enhanced by such uses.

For example, a policy initiation or adjustment may come from a legislative change. Underlying a piece of legislation may be a green paper or discussion paper. A green paper is likely to consider the research informing the proposed legislation. If so, this could be considered part of evidence in relation to the policy position.

The current Aboriginal Education and Training policy (a small ‘p’ policy) was developed in response to the Report of the Review of Aboriginal Education 2004, in collaboration with Aboriginal communities and key partners. It is also informed by developments in state and national education and training policies and reports on Aboriginal issues.

An example of published research that informed policy relating to the DEC Homework Policy. A research scan was conducted and the report of this scan is available publicly under related information on the Homework policy page. It is clear from the document that there was an attempt to obtain empirical evidence.

### How can impartiality be achieved in policy development and decision making?

Jassanoff ([2011](#_ENREF_17)) suggests that the term "objective" means, in its dictionary definition, "not influenced by personal feelings, interpretations, or prejudice; based on facts; unbiased." One way of conceiving impartiality or objectivity is as the view of the ***‘impartial spectator’***.

It may be questioned whether policy can ever be impartial since it involves taking a position. However, a position can be informed by a balanced consideration of the arguments for and against that position and the evidence supporting each of these arguments. If so, the position is based on an impartial consideration of the evidence.

Amartya Sen ([2010](#_ENREF_27)) asks “What kind of reasoning should count in the assessment of ethical and political concepts such as justice and injustice?” Policy development involves the assessment of ethical and political issues. Sen’s answer is reasoning that is *open, impartial, objective and public* - or reasoned scrutiny from different perspectives.

Underlying his idea of justice (and assessment of ethical concepts generally) is an open impartiality invoking a wide variety of views and outlooks based on diverse experiences from far and near, including the points of view of individuals not impacted by the institutions ([Sen, 2010](#_ENREF_27)).

Sen suggests that if the discussion of ethical concepts is confined to a particular locality, there is a danger of ignoring or neglecting many challenging counter-arguments that might not have come up in local political debates but which are worth considering in an impartial perspective. ([Sen, 2010, p.407](#_ENREF_27)).

Why should we seek impartiality in policy development? A rationale is that *in policy making we do not want to overlook any important consideration pertinent to the policy*.

Sen suggests that the case for reasoned scrutiny lies not in any sure fire way of getting things exactly right but on being as objective as we reasonably can ([Sen, 2010, p.40](#_ENREF_27)).

Edwards and Evans suggests that impartiality in decision making involves an analysis of alternatives and their consequences, not simply cherry picking from available evidence without regard to validity of material ([Edwards & Evans, 2011](#_ENREF_11)).

Navid Ghaffarzadegan claims that “Public policies often fail to achieve their intended result because of the complexity of both the environment and the policy-making process” An understanding of the main feedback structure of a system, as provided by a small system dynamics model, is helpful to effective policy design. Only when the full feedback structure is considered is the likely ineffectiveness (or effectiveness) of the policy revealed ([Ghaffarzadegan, Lyneis, & Richardson, 2010, p.30](#_ENREF_13)).

### Is some evidence more reliable than other evidence? Are there hierarchies of evidence?

The issue of whether some kinds of evidence (quantitative) is of greater value or reliability than other kinds of evidence has been extensively debated in the literature since The No Child Left Behind Act (2000) introduced the concept, “scientifically based research in education”. It was the first time in US history that the federal government had mandated research methodology in federal law ([St Pierre, 2014](#_ENREF_28)).

The No Child Left Behind Act advocates the place of randomised controlled trial (RCT) methodology in social research as the preferred paradigm of proof. In the simplest form of RCT, some subjects receive a treatment and others do not according to chance allocation. Any difference between the treatment group and the control group is then taken to be a real effect, that is to say, an effect on and above any extraneous factors that could possibly influence the result.

The place of RCTs was put by Andrew Leigh ([2009](#_ENREF_20)), in which he advocated a hierarchy of evidence. Leigh strongly advocates the place of randomised controlled trials as the Gold Standard of Evidence in social and policy research. Leigh cites a couple of examples of such hierarchies and proposes one of his own for the Australian context:

|  |
| --- |
| A possible evidence hierarchy for Australian policymakers  1. Systematic reviews (meta‑analyses) of multiple randomised trials  2. High quality randomised trials  3. Systematic reviews (meta‑analyses) of natural experiments and before‑after studies  4. Natural experiments (quasi‑experiments) using techniques such as differences‑in‑differences, regression discontinuity, matching, or multiple regression  5. Before‑after (pre‑post) studies  6. Expert opinion and theoretical conjecture  *All else equal, studies should also be preferred if they are published in high‑quality journals, if they use Australian data, if they are published more recently, and if they are more similar to the policy under consideration.* |

([Leigh, 2009, p. 35](#_ENREF_20))

**Objections to a hierarchy of evidence**

The hierarchy of evidence approach advocated by Leigh applied in education is highly controversial because it does not include qualitative research.

The idea of a hierarchy of evidence in which an RCT is a “gold standard” appears to presuppose an absolute hierarchy. However different kinds of evidence – and different methodologies – are relevant in answering different kinds of questions.

RCTs are advocated as best suited to providing information needed by decision makers to address

* Can it work?
* Will it work?

In relation to the evaluation of a trial of an intervention in an educational context we may also want to know:

* has it worked?
* if it has, why?
* if it has not, why not?
* How has it worked?
* What works for whom in what circumstances? ([Tilley, 2000](#_ENREF_30))

Other questions might include:

* How much does it cost? or
* Does it have deleterious side effects? ([Cartwright, 2008](#_ENREF_7))
* For what other populations can we expect these same conclusions to hold?

Answering these questions is vital for facilitating generalisability and for the success of the eventual roll out of the policy intervention.

RCT methodology is not well suited to answering the “why” questions, particularly in the evaluation of a trial of an intervention. Qualitative research is often used for policy and program evaluation research since it can answer certain important questions more efficiently and effectively than quantitative approaches. This is particularly the case for understanding how and *why* certain outcomes were achieved (not just what was achieved). Qualitative methodologies (such as ethnographies) are generally better suited to understanding the dynamics of complex systems such as societies (human and non-human) organisations such as businesses, schools and classrooms. Education policy makers are vitally interested in developing a deep understanding of nested social systems – for example the relationships between school systems, schools, faculties, programs and classrooms – and understanding relationships between individuals within such social structures ([Pawson, 2006](#_ENREF_25)).

According to the OECD, “policy making at the system level needs to be informed by high-quality data and evidence, and not driven by the availability of such information. Qualitative studies as well as secondary analysis of the available measures and indicators are essential information to take into account in policy development and implementation. Qualitative approaches include the narrative provided by external school evaluation reports, key stakeholder feedback on broader outcomes (e.g. school climate, student engagement, views on the implementation of school reforms) and qualitative appraisal of teachers and school leaders. ”([OECD, 2015](#_ENREF_24))

*Criteria for quality research*

Policy making needs to be informed by high quality research. Questions about the quality of research cannot be decided in terms of hierarchies of evidence or methodologies. Rather the following criteria might be used to assess research quality:

* the design of the research demonstrates care and systematic attention to detail in planning
* research goals and research questions are feasible, focused and clearly stated
* the theoretical context and presuppositions of the research are made explicit ([Argyrous, 2012, p. 462](#_ENREF_2))
* relationships with past research are made explicit ([Argyrous, 2012, p. 462-463](#_ENREF_2))
* the research strategy adopted is appropriate to answering the research questions
* the researcher has taken steps to minimise the possibility of unrecognised or selective influences on the data collection and analysis
* methods for analysing the data are clearly stated, systematic and appropriate to the nature of the data ([analytical choices and assumptions are made explicit; Argyrous, 2012, p. 461-462](#_ENREF_2))
* the research has been designed to consider and account for all important influences on the issues or variables being investigated
* no available evidence for or against the theory has been overlooked
* limitations of the research have been identified and unwarranted generalisation avoided
* the researcher has made available
  + raw data available for reanalysis
  + research instruments
  + metadata - providing the background and context to the evidence that has been collected ([Argyrous, 2012, p. 459-460](#_ENREF_2))

These criteria apply to quantitative, qualitative and philosophical investigations, and equally to the investigation of simple and complex systems, though different methods may be appropriate to the investigation of simple systems compared to complex systems. Quality of research relates more to systematicity and avoidance of bias and judgement against clear a relevant criterion than to the certainty of conclusions.

Research in education can meet these criteria just as readily as research in the physical sciences or medicine.

### How are policies best evaluated and over what timeframe?

Evaluation is defined for DEC as: “a rigorous, systematic and objective process to make judgments about the impacts and merits or worth of a program, usually in relation to its effectiveness, efficiency and appropriateness.” (NSW DEC Evaluation Framework)

Building a culture of evaluating policy is consistent with *Government Direction* [*C2013-08 Program Evaluation and Review*](http://arp.nsw.gov.au/c2013-08-program-evaluation-and-review) and the [*NSW Government Evaluation Framework August 2013*](http://www.dpc.nsw.gov.au/__data/assets/pdf_file/0009/155844/NSW_Government_Evaluation_Framework_Aug_2013.pdf) and the Department’s current Evaluation Policy and Framework.

There is a range of methodologies available to evaluate policy – for example, quantitative, qualitative and philosophical. The type and applicability of the policy can assist the determination of an appropriate method of evaluation. Formative, process, outcome and economic evaluations are described in departmental procedures and occur at different stages in the implementation of a program. Cost-benefit analyses of the evaluation method are also a key consideration.

Questions we might ask about policies are similar to questions we might ask in the evaluation of (other) interventions. In brackets are possible ways to consider this in the planning of the policy development.

* Has the policy worked? (Planning stage: What are we trying to achieve? How will we know if it worked?)
* If so, why? (Planning stage: How will it work?)
* If not, why not? (Planning stage: How will it work?)
* How has it worked? (and was it the policy? Causality?) (Planning stage: How will it work?)
* For whom has it worked and in what circumstances? (Planning stage: Consultation)
* Has it been more effective in some contexts than others? (Planning stage: Consultation and gathering evidence about different contexts we are trying to support)
* How much has it cost? (Planning stage: Budget planning)
* Has it had unintended outcomes and are they beneficial? (Planning stage: Consultation)
* Is it morally/socially/politically acceptable? (Planning stage: Research, evidence gathering, consultation)

Head’s model of the policy process suggests an evaluation and review stage – post-delivery and pre-(re)initiation. General principles of evaluation (such as those articulated in the Department’s Evaluation Policy) suggest that evaluation be considered during planning and throughout any implementation process. How the policy will be evaluated should be considered early, during planning.

Early evaluation planning can inform the selection of the best available methodology to use for the evaluation. Questions such as: What are we attempting to achieve and when?, and What will this look like if it is working?, can help to identify potential indicators or measures (qualitative or quantitative). This establishes the benchmark before the policy is introduced to enable a way to identify what has changed when it comes to conducting the evaluation. This program logic approach improves the robustness of impact evaluations.

The delivery stage requires careful monitoring and evaluation. Care needs to be taken not to rush to conclusions about the effectiveness of a policy. Zhou Enlai, first Premier of the People’s Republic of China, was once asked about the impact of the 1789 French Revolution on the Chinese Revolution. He is reputed to have replied “It is too soon to say”. Policy makers might benefit from similar caution.

### What kind of style should be used in writing policies, and how are they best communicated?

If policies are to be useful tools to support school leadership and administration, enabling principals and teachers to focus on providing quality education and safe learning environments, then effective communication and easy access to policies are essential.

According to Professor Gary Sturgess (UNSW), research with front-line managers has found:

* There is too much policy
* Abstract policy principles don’t relate well to the narrative experience of frontline staff
* Policy is amended too often (and we forget to take down old versions)
* People at the frontline create common law
* People at the frontline are focused on outcomes (what is happening for my students, not whether I am doing what the state office wants me to do)

**Understanding the audience:**

Primarily, Public Schools NSW policies are aimed for use by schools. However, policies affect the whole school community. For accountability and transparency, the broader audience is also considered in developing communication strategies.

Ethnographic study is one way to understand what happens at the frontline so that we can understand how to formulate policy and learn from local policy at work. The underlying premise to this approach is that it is not possible to define a problem until we have understood the people that it impacts. Policy ethnography reframes the position of the policy-maker by starting in the environment of policy implementers to understand their work context work and identify the path of least resistance to effect change. Important questions include the basis of their daily practice, the substance of their work, how they engage with the community and conceive of their role in relation to it, the consistency of their work versus the nature of disruptions, how they structure the school environment for staff and students, and how the compliance regime might be negotiated.

**Getting to the point**

The NSW Parliamentary Counsel’s office introduced policies relating to plain language and gender-neutral expression for all legislation in the 1980s. Generally, there is increased focus on this approach in government and business communication.

Plain language (sometimes referred to as plain English) is about delivering accurate information in a clear, concise way that is easily understood by the recipient.

More than using everyday words, short sentences, and active voice, plain language involves:

* planning, designing, and organising documents with the readers in mind;
* using sentences and paragraphs that lead readers through the document without taxing their memories;
* providing informative headings, topic sentences, and frequent summaries that keep readers oriented and let them scan for what they need;
* using lists and tables that make information easy to absorb. (Byrne)

Measures of excellence include: clarity – a single message that is found quickly and understood easily; correctness; conciseness; and credibility.

A simple test for plain language is whether readers can quickly and easily find what they need and understand it the first time they read it.

The Communication and Engagement intranet site, available through the A-Z of DEC link, provides useful communication tools, including departmental style guides and accessibility for people who may use assisted technologies and availability of information across multiple digital platforms.

**Accessibility and mediums of communication**

Communication mediums offer different options for the presentation and formulation of policy. Specifically, digital technologies afford opportunities to involve stakeholders, such as frontline managers, staff, students, and parents throughout the development and implementation process. This process is central to people-centred design, which is premised on the view that that engaging with and designing for the needs of those who will be impacted by a product will increase its efficacy.

Digital technologies include social media; the suite of tools that are based on the creation and exchange of user-generated content. Examples of social media include Twitter, Yammer, blogs, polling sites, YouTube, and wikis. These platforms offer the flexibility to recruit stakeholders, collect and analyse data of different modalities and degrees of formality and sophistication and to develop content collaboratively.

Social media is commensurate with the aims of people-centred design because it relies on users to drive discourse. It also has the benefit of offering a high-level picture of stakeholders that emerges from automatically tracked statistics such as the physical location, time of day, frequency, duration and number of page views accessed on the site. These analytics can reveal trends in interest level, clustering of stakeholders and usage patterns that are tedious to have respondents document accurately but that can reveal informative patterns when collected as background data.

These technologies offer a wider choice of communication dynamics. They enable rapid communication that can be synchronous or asynchronous in nature. Stakeholders excluded from traditional forms of engagement due to limitations in location, working hours, status as well as cultural barriers that discourage information sharing have further options to engage in the social media setting. This is associated with its tendency to disrupt traditional power structures that may elevate some stakeholder voices over others; a digital system can be constructed using permission levels that are set by a neutral arbiter – in this case the policy researcher.

The Department’s digital services area uses people-centred design for website development. Designers find out about what users need, how they want to do these things, how to simplify their interaction with the website and how to make these interactions an enjoyable experience.

The rationale for people-centred design for public services is that public institutions exist to provide public value, as authorised by the electorate (Moore, 1997); this view is consistent with the 2020 plan and open government models. People-centred design also supports the notion that public value is something to be co-created with citizens. Government does not always know how best to serve the public and may not be meeting needs of citizens. This communication strategy is influenced by Service Design UK that has established design principles for digital services: <http://www.gov.uk/design-principles> . The first principle is to start with user needs.

You can see UK Government’s presentation of policy at: <http://www.gov.uk/government/policies>

The Victorian *School Policy & Advisory Guide* website is a clean and well laid out website, more closely approaching the UK presentation of policy. The search function allows quick and easy access to desired information. The format and flow of information starts by addressing the what, the required actions and then the background. It is aimed at responding to the needs of school leaders.

It is reflective of a broader move to providing public services that are better tailored to serve the individual needs of recipients ([Leadbeater, 2003](#_ENREF_19)) and of a parallel shift in business from mass production to mass customisation ([Hargreaves, 2006](#_ENREF_15)). The latter is viewed as a more innovative way to cater to the needs and aspirations of clients and customers.

Currently, there are a number of tools currently available to policy developers to provide guidance:

* Policy Documents – DET requirements policy
* Policy Documents – Policy publishing procedure
* Policy Documents – Format guidelines
* Policy Preparation – Guidance, Metadata, information access and user experience.
* Online policy publication: Business requirements and content process for intranet/internet
* Policy publishing business requirements

As part of the Policy Review Process including stakeholder feedback there has been recommendation for review of these documents.

### What are the implications of the answers to the above questions for the policy framework and template and the Policy documents – DEC requirements policy?

The Department’s Five Year Strategic Plan 2012-2017 states that:

* “we must use our publicly funded resources wisely and make open and transparent decisions based on solid research and best practice” (page 7)
* “we will use data, evidence and evaluation to inform planning and practice” (page 7)

It follows that we develop policies informed by research, since policies inform open and transparent decisions.

The review highlights the many different, and equally valid, perspectives on what policy is and this demonstrates the need to clearly define what the Department means by policy in any development framework to ensure a clear understanding of requirements and actions.

**Recommendations**

**For a policy development framework:**

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| --- | --- |
|  | Recommendation |
| 1 | Refine Head’s model of policy analysis to suit the DEC context. Each element unpacked with practical step by step information and support for policy content specialists. The policy planning phase of the Head model could include the draft step by step processes for policy writing, reviewing and rescission developed by the policy review team. Attached at Appendix A. |
| 2 | Include a meta-analysis of current policy in the review process. Questions could include:   * Is a new policy necessary? * Is there an existing policy that the problem being addressed sits within? |
| 3 | Monitoring and review. A suggestion from the Policy Review Project is the introduction of a triennial review process. Depending on the complexity of a policy, there could be considerations to shorten or extend this proposal. If policies capture the why and procedures and guidelines provide the how, then the supporting documents may need more frequent review than their overarching policy. |
| 4 | Embed research and principles of evaluation in the policy analysis process.  It is proposed that new policies developed within the Department include a reference section that details evidence gathered to inform the policy development. An example could be a literature review:   * Research that informs policies will need to be balanced and take account of a variety of viewpoints * A review of current and past literature is an important part of examining credible prior knowledge of any given field or practice * Reviews of current and past literature are an important way for researchers and practitioners to keep abreast of the latest theories and practices and to help policy makers make informed decisions * Comparison of policies in other jurisdictions, nationally or internationally. Such a comparison should identify the reasons for those policies.   Literature reviews are undertaken to ascertain established knowledge of a given issue or topic prior to undertaking any research study ([Webster & Watson, 2002](#_ENREF_32)) consider that an effective literature review “creates a firm foundation for advancing knowledge. It facilitates theory development, closes areas where a plethora of research exists, and uncovers areas where research is needed”. |

**Recommendations for *Policy Documents – DET Requirements* policy (PD20040001):**

The current DEC policy on policy provides a good starting point and useful tools for policy developers. There is room for consolidation and improving accessibility. A review is recommended.

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| --- | --- |
|  | Recommendation |
| 5 | Addition of links to other key mandated information held within the Department be added to the policy site. For example, public legal bulletin site, schoolbiz memoranda, Secretary directions. |
| 6 | Suggest consolidating and attaching the published policy development documents listed above onto the *Policy Documents – DET Requirements* policy page. |
| 7 | Clearly identify and define terminology. Policies, policy documents or policy instruments. Reconsider current definitions of procedures and guidelines.   1. Include compliance with statutory or regulatory requirements in the definition of policy 2. Consider the current definitions of procedures and guidelines and the extent to which the current distinction between these implementation documents is required by the system and is clearly understood by users. 3. Note that the ‘policy documents’ as defined in *Policy Documents – DEC Requirements* aims to provide clarity and support for policy implementation in practice. This definition does not prevent the Department fulfilling its obligations and satisfying the intent of the broader legislative and regulatory environment. Examples include GIPA and Board of Studies and Teaching and Educational Standards (BOSTES) definitions of ‘policy documents’. 4. A comparative example is Queensland’s Quick Guide to Policy Instruments |

It is proposed that the *Policy Format Guidelines* (PD20040001) be modified as follows:

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| --- | --- |
|  | Recommendation |
| 8 | In Section 3. **Context** include “3.2 Reasons for the policy position, including any research evidence” |
| 9 | Add Section 7. **References** |
| 10 | Add **Appendix A. Review of Evidence** (For example a literature review, this may refer to existing literature reviews) |
| 11 | Section 5. Monitoring and Evaluation. Strengthen to reflect our environment of increased accountability and an evaluation culture. This leads a policy analyst to consider methods of evaluation and review during policy development. Examples and reference to the evaluation policy could be included. |
| 12 | Section 5. Monitoring and Evaluation.   1. Monitoring 2. Add research 3. Suggest review timeframes 4. Clearly differentiate between the review of a policy and the review of its implementation 5. Strengthen evaluation component in alignment with DEC Evaluation policy |

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### Appendix A

* Policy review process
* Policy writing process
* Policy rescission process

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| --- |
| Draft process to review policy documents\* |
| 1. Identify the driver for a review of the policy, procedures and/or guidelines   Out-of-date information, 3-year review cycle, system restructure or realignment, research, legislative change, government priorities, initiatives or reforms |
|  |
| 2. Identify key stakeholders. |
|  |
| 3. Consult with key stakeholders including Policy, Planning and Reporting.  Identify and summarise the changes to the policy document required to address current system structure, needs and government/legislative requirements. |
|  |
| 4. Conduct and/or obtain evidence to inform the policy document.  Including best practice across jurisdictions. Prepare a report on the evidence, an impact statement mapping intersecting policy documents and a risk assessment. |
|  |
| 5. Draft the revised policy document within DEC guidelines  [Policy Documents – DET Requirements](https://detwww.det.nsw.edu.au/policies/general_man/accountability/reqs_doc/PD20040001_i.shtml?level=Corporate&categories=Corporate%7Cadministration%7Cpolicy+development) |
|  |
| 6. Engage stakeholders for comment on the revised policy document.  Record feedback and stakeholder consultation process. |
|  |
| 7. Consider and document outcomes.  Edit and change the revised policy document where necessary. |
|  |
| 8. Prepare a submission to the Executive Director for approval of the revised policy document.  Include research, rationale and consultation report.  Executive Director responsible will table the revised policy document for the information and endorsement of PSEG. |
|  |
| 9. Upon approval add the revised policy on the website and intranet.  Liaise with Communication and Engagement to publish to the policy website. |
|  |
| 10. Prepare and implement a communication strategy to inform stakeholders including principals and relevant staff.  Use relevant channels including SchoolBiz. |
|  |
| 11. Ensure that all approvals and associated documents are captured as records in TRIM. |

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| Draft process to write policy documents \*  Steps 2-5 may not occur in the order listed. The process may be adapted to best suit the policy document being developed. |
| 1. Identify and clearly define the need for a policy, procedures and/or guidelines   System restructure or realignment, research, legislative change, government priorities, initiatives or reforms. |
|  |
| 2. Conduct and/or obtain evidence to inform the policy document.  Prepare a report on the evidence, an impact statement mapping intersecting policy documents and a risk assessment. |
|  |
| 3. Draft overview including all aspects of the proposed policy document.  Include rationale for the policy document. |
|  |
| 4. Identify key stakeholders. |
|  |
| 5. Consult with key stakeholders including Policy, Planning and Reporting.  Confirm the need for the proposed policy document. Record feedback and adjust the policy if necessary. |
|  |
| 6. Draft the revised policy document within DEC guidelines  [Policy Documents – DET Requirements](https://detwww.det.nsw.edu.au/policies/general_man/accountability/reqs_doc/PD20040001_i.shtml?level=Corporate&categories=Corporate%7Cadministration%7Cpolicy+development) |
|  |
| 7. Engage stakeholders for comment on the policy document.  Record feedback and stakeholder consultation process. |
|  |
| 8. Consider and document outcomes.  Edit and change the policy document where necessary. |
|  |
| 9. Prepare a submission to the Executive Director for approval of the policy document.  Include evidence, rationale and consultation report. Executive Director responsible will table the new policy document for the information and endorsement of PSEG. |
|  |
| 10. Upon approval add the new policy document on the website and intranet.  Liaise with Communication and Engagement to publish to the policy website. |
|  |
| 11. Prepare and implement a communication strategy to inform stakeholders including principals and relevant staff.  Use relevant channels including SchoolBiz. |
|  |
| 12. Ensure that all approvals and associated documents are captured as records in TRIM. |
| Draft process to rescind policy documents\* |
| 1. Identify policy document, review the purpose and key aspects and develop a rationale to rescind.   Summarise all aspects that are out-of-date and those that are, or could be, addressed in other policies. |
|  |
| 1. Identify key stakeholders. |
|  |
| 1. Consult with key stakeholders including Policy, Planning and Reporting  to determine benefits and risks of rescission.   Record stakeholder feedback and consultation process. |
|  |
| 1. Consider and document outcomes to confirm that policy should be rescinded.   Include an impact statement and risk assessment. |
|  |
| 1. Liaise with Communication and Engagement and Information Technology directorates to identify all references or links to the policy. |
|  |
| 1. Make a submission to the Deputy Secretary for approval to rescind the policy document,   Include rationale and consultation report.  Executive Director responsible will table decision for the information of PSEG. |
|  |
| 1. On approval, remove policy and associated documents from the policy site.   Remove or redirect references and links to the policy and update stakeholders. |
|  |
| 1. Prepare and implement a communication strategy to inform stakeholders including principals and relevant staff.   Use relevant channels including SchoolBiz. |
|  |
| 1. Ensure that all approvals and associated documents are captured as records in TRIM. |