

THE INSTITUTIONAL GRAMMAR TOOL MEETS THE NARRATIVE POLICY FRAMEWORK: NARRATING INSTITUTIONAL STATEMENTS IN CONSULTATION

DRAFT FOR COMMENTS

Abstract

We compare the central analytical categories of two approaches ultimately anchored to categories based on language - the Narrative Policy Framework (NPF) and the Institutional Grammar Tool (IGT). We first theorize the coordinates of the conversation between NPF and IGT, working on the affinities and differences in the key categories. Then we provide a demonstration of how the conversation may develop by analyzing original data on the design of consultation procedures in the European Union, Finland, Ireland and Malta. Our exercise reveals how to navigate from NPF to IGT and how the two lenses can be combined to improve on concepts and gain in explanatory leverage.

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Keywords

Consultation; Discourse; European Union; Institutional Grammar Tool; Narrative Policy Framework

Acknowledgement: Research funded by the project Procedural Tools for Effective Governance, Protego (European Research Council, Advanced Project)

1. Introduction

The Narrative Policy Framework (NPF) is one the main theoretical lenses on the policy process. It approaches the study of public policy from the perspective of the stories and narrations that characterize policy controversies and, more generally, public policy (Jones et al. 2014; Shanahan et al. 2018). An actor-centred approach, the NPF theorizes that actors discursively portray all the major elements of public policy in narrative form. Policy narratives follow a common structure that can be identified empirically via different techniques of coding, experiments and discourse analysis (for examples see Shanahan et al. 2017; Jones and Song 2014; Radaelli et al. 2013; Gray and Jones 2016).

The Institutional Grammar Tool (IGT) is one of the other major tools to analyze policy language (Crawford and Ostrom 1995; Ostrom 2005). Developed within the broader Institutional Analysis and Development (IAD) framework by Elinor Ostrom and her associates (Ostrom 2011; Schlager and Cox 2017), the IGT captures the interactive dynamics of action situations by studying the grammatical features of institutional and governance arrangements.

The starting point to investigate the action situation consists in the grammatical structure of institutional statements that govern the interactions between actors. These statements are not the only attribute of the action situation, but, for a policy analyst, they are the primary focus of attention. There are three types of institutional statements: rules, norms and shared strategies. According to the ADICO categorization, they share a common core (Attributes-Choice-Conditions) but differ in the presence of Deontics (norms) and Or else (rules). Focussing on the latter, the IGT has also developed a semantic system of categorization known as rule types. Crucially, these statements, whether analysed grammatically or semantically, represent shared discursive (Crawford and Ostrom used the adjective 'linguistic') entities that "describe opportunities and constraints that create expectations about other actors' behavior" (Crawford and Ostrom 1995; now in Ostrom 2005: 137). Behavior in action situations is theoretically predicted and empirically observed (Ostrom 2005: 33) by adding to the triad of rules, norms and strategies the attributes of the biophysical world and those of the community.

Our main aim is to start a conversation between the NPF and IGT theoretical categories. Why start this conversation? Both lenses are actor-centred (narratives and statements are invariably uttered by agents). They also assume a structural dimension of public policy – by this, we mean that there are essential features that are not random and can be recognized across a variety of contexts, times and places. In short, they share the belief that the regularities we observe in the patterns of human interactions revolving around policy problems can be explained by a universal signifier, or to put it better by how actors within their contexts reproduce that universal signifier. In the case of the NPF, the universal form (or structural property) is discourse. Actors shape policy via discourses that take narrative forms. At the roots of the NPF lies the *homo narrans* – narrative is the principal form of human communication which brings cognitive order to an otherwise chaotic social world.

For the IGT, following Crawford and Ostrom (1995), the universal form is (institutional) language. Actors shape policy through the reproduction of rules-in-form and rules-in-use which set the boundaries of collective action or represent the rules of the interactive governance game. The universality of rules lies in being linguistic products characterized by universal grammatical (ADICO) and semantic (rule types) structures. The universality of the different articulations of language (expressed through narratives and rules which show common structural features across space and time) is therefore the common core which draw us to start this conversation.

Empirically, the unit of analysis of the NPF and the IGT vary (narratives and rules), but in the end these units are always drawn from language. The IGT then creates observations and data via a grammatical/semantic approach, whilst the NPF considers that language is articulated in narrative structures.

To build the foundations of a possible conversation between the two frameworks, we further observe that narrations do not fluctuate in vacuum. They are communicated by actors in situations governed by their institutional grammar. At the same time, institutional statements are not a given. Language is also the form in which people share meanings and make sense of institutional statements. And narration is a classic form in which individuals make meanings explicit and derive implications for their behavior.

In the remainder, we develop the coordinates of a possible conversation by connecting the NPF and the IGT first. Instead of comparing lenses (as done by Schlager and Blomquist 1996), we wish to point to the pathways for a possible dialogue. First, we theorize how NPF categories may or may not travel into IGT categories. Then, we develop our research questions. We address the questions with original data gathered on official nationwide guidance on stakeholder engagement in the preparation of primary and secondary legislation. Essentially, in our empirical Section we demonstrate that a conversation may take place, and draw lessons in the Conclusions.

2. Starting the Theoretical Conversation

The NPF works with a structural template of how policy narratives appear in language. Political scientists have different options when studying policy narratives (Tuohy 2019). The NPF is flexible enough to account for specific narratives that appear in a given policy controversy and broader narrations of an administrative process, a country's approach to a given problem/opportunity, an institution (Shanahan et al. 2017: 180; 195-197) and narratives that 'create socially constructed realities that manifest as institutions' (Shanahan et al. 2017: 195). The IGT has an equally wide-range of applications. Its flexibility for the analysis of a corpus of laws and regulations has been shown in previous research (Dunlop, Kamkhaji, Radaelli 2019). A recent article has applied the IGT to the corpus of the legislative bases for consultation in the 27 countries of the European Union and the UK (Dunlop et al. 2020).

How can we integrate NPF and IGT? Thinking of the structural dimensions of the NPF, there are four core components found in policy narratives, the: **setting, characters, plot** and **moral**. While there are many additional components and narrative strategies being added to the NPF as the field grows, these are the four components which must be present for a policy narrative to earn its narrative status in NPF; thus, at this early stage of the NPF-IGT fusion, we concentrate mainly on these. We now discuss each in turn noting the possible points of contact with IGT's rule types (see table 1 for the summary).

The **setting** or context is the discursive representation of where the action is situated. For the IGT the context is approached by the IGT's central attributes of the community – the core non-biophysical attributes are those of the community organised by the institutions of the polity.

Next come the NPF **characters** who are described using categories drawn from policy controversies. In controversies, actors take on specific roles that are discursively portrayed by dint of motives, normative qualities and resources. Three classic **characters** are heroes, villains and victims (Stone 1988; Shanahan et al. 2017). These are common because they nudge the listeners towards a given conclusion – for example, villains are motivated by wrong or ill purposes (Shanahan et al. 2017). Of course, they are not the only characters possible. Most notably, there is always a narrator – sometimes a name character (possibly

an organisation or institution) but often a nameless but all-knowing actor telling the story. Either way, we theorize that characters are found in the IGT by two rules: **position** and **boundary**. **Position** rules define the role of an individual or collective actor. While **boundaries** demarcate eligibility for the position. For example, an institutional statement may refer to 'all citizens' or 'those affected by this policy proposal' as actors who can contribute to public consultation.

Policy stories typically come with a causal **plot**. Plots can be coherent – with clear beginning, middle and end and their causal and temporal connections – but they may exist only in fragments where causation is non-linear, segmented, even incoherent. When present in its most coherent form, the plot is the set of cause-and-effect mechanisms connecting past to present and future (Shanahan et al. 2017). We argue that in the IGT the plot will emerge as a combination of some (though perhaps not all) of the different rule types which are found at the heart of the institutional action situation. **Choice** rules define what actors can do in a given situation. **Information** rules refer to publication and transparency requirements. **Aggregation** rules have a place in the plot when two or more actors must convene and produce a collective decision, or when an actor is convened by another with authority to take a decision affecting the first actor. The plot may also include sanctions and rewards – 'if you do this, you will find yourself better off and rewarded in the future'. For the IGT these are **payoff** rules.

Finally, **scope** rules inform the audience of the aims of the narration and, within the broad narrative scheme, of the specific desired or prohibited outcomes of the action situation. We theorize that they should appear mostly in the NPF category of **moral** of the story. The moral assigns purpose to the actions of the characters. This is the 'point' that the story makes. It shows why it's good, efficient, desirable to act in line with the statements included in a guidance document or a law. The moral can be connected by undesirable circumstances by pointing to threats, such as 'those who do not follow the prescriptions may find problems later in the process'. Hence **payoffs** rules may strengthen the moral.

Before we close, we need to add the temporal dimension. Indeed, the reference to outcomes demands that we openly consider the time dimension. While the NPF is explicit in considering time as a defining characteristic of the plot, rule types are rather static and do

not openly include the time dimension – although scope rules implicitly refer to time as the aim to be achieved one day.

Table 1 sums up these connections between NPF and IGT.

Table 1 Linking NPF Categories to IGT Rules

NPF	NPF Definition	IGT	IGT Definition
Setting	Context of narrative development	Attributes of the community	Exogenous context
Characters	Human or nonhuman, individual or collective	Position	Identify positions/roles to be filled by actors (individuals or collective)
Characters	Human or nonhuman, individual or collective	Boundary	Regulate eligibility of actors to occupy positions
Plot	Causal story linking past-present-future	Choice	Specify actions that actors must, must not, or may undertake
Plot	Causal story linking past-present-future	Aggregation	Discipline actions or decisions that require the aggregation of two or more actors (e.g. rules about independent oversight)
Plot	Causal story linking past-present-future	Information	Identify channels and modes of communication/exchange of information between actors
Plot	Causal story linking past-present-future	Payoff	Assigns benefits and costs – for example rewards and sanctions – to specific actors relative to following distinct courses of action
Plot	Causal story linking past-present-future	Scope	Identify required, desired, or prohibited outcomes of the action situation. They implicitly refer to a time dimension
Moral	The point of the story	Payoff	Assigns benefits and costs – for example rewards and sanctions – to specific actors relative to following distinct courses of action
Moral	The point of the story	Scope	Identify required, desired, or prohibited outcomes of the action situation

Source: Authors' own

3. Research questions, case selection and data generation

Given this vast theoretical landscape, we can explore only a limited number of research questions. These are:

1. How do the NPF categories map onto IGT rule types? We theorize some possible plausible connections, but we need to probe our conjectures empirically
2. Empirically, how does the joint application of NPF and IGT shed light on a given procedure or policy?
3. How do narration and grammar complement each other conceptually? What does this complementarity suggest for further theoretical integration?

Turning to case selection, we must identify an action situation where institutions speak about what actors should do and why. This leads us to the choice of institutional statements affecting policy processes, or rules contained in procedures. The institutional ‘speech’ must also embed some form of narration rather than being a dry technical/legal listing of prescribed actions. An important characteristic we look for (in order to endogenize time) is the sequential nature of the action situation – which is typical of regulatory and administrative procedures.

Consultation procedures – also known as ‘stakeholders engagement tools’ or ‘notice and comment’ – are rich in both rules and narrations. This is because consultation has a prominent procedural aspect but underpins also a specific ideological approach to policy making which very often warrants guidelines rich in examples, stories and causal plots. Consultation is also a new territory for the NPF because it does not belong to the field of policy controversies. Governments publish consultation guidance not to engage for or against an option, hence we may not expect heroes, villains or victims in the standard sense. However, they can still exist in slightly different forms – we expect the stakeholders to be described in positive terms, as individual or collective entities that can provide evidence and broaden the views and legitimacy of the policy-makers. The IGT, and more generally the IAD, have a tendency to consider common pool resources, therefore consultation is new territory for this lens too.

IGT rules were gathered using protocols that identify the exact wording of a rule in primary or secondary legislation on consultation in force at the time of data collection (2018-2019). These original data on law as text were gathered for all European Union (EU) countries and for the guidelines on consultation of the European Commission (2017) – an organization with its own policy formulation process. Lawyers based in each country were hired on a temporary basis to assist with the correct identification of the legal base in force in 2018 and the retrieval of IGT rules – in original language and English translation.

Having computed the total number of consultation-related rules for each case, we selected cases in the highest quartile. Our reasoning is that cases with a small number of total rules indicate the lack of interesting narrative features (the story is very short) or lack of formal consultation – few institutional statements in formal guidance may point either to symbolic or informal procedures of stakeholders' engagement.

We selected the cases of Finland, Ireland, Malta and the European Union (that is, consultation guidelines of the European Commission) in the highest quartile. The presence of the EU (guidelines on consultation) is interesting also for the multi-level character of this organization. Stakeholders in EU member states can participate both in domestic consultation and engage with EU policy at different stages, including the stage of preparation of the impact assessment of proposed EU legislation. The consultation procedures are described in OECD documents on better regulation (see for example OECD 2018).

The data on narrative categories were gathered by coding the consultation guidance with a classic NPF template. In practice, we coded relevant portions of text included in guidance documents using the NPF categories of table 1. Further, for each portion of text belonging to an NPF category we identified the correspondent IGT rule type(s). Two authors coded independently the same case to check on construct validity and reliability (pilot stage). Then after having finalized constructs, each author generated the final data on a single case.

We now take each case in turn – following the setting-characters-plots-morals NPF format. Each case also contains a summary table for easy reference to the connections between NPF and IGT categories.

4. Empirical Analysis

4.1 European Union

Setting

The Guidelines on Consultation are set in the context of a monumental Better Regulation Guidelines (they make up the seventh chapter). Consultation is narrated with a grand-angle, not only as part of the Better Regulation policy, but also as an overarching activity that informs all the stages of the EU policy process, from inception to evaluation. In setting the stage, the Commission distinguishes between formal consultation and feedback:

“Consultation involves a more structured engagement with stakeholders where the consultation principles and standards apply; whereas the feedback process allows stakeholders to provide comments on a particular document which will be considered in the further elaboration of the document or initiative” (European Commission 2017: 70, footnote 105).

Formal consultation applies to impact assessments but also to evaluations, communications and green papers. Feedback is envisaged for other activities such as providing views on draft legislation. Boundaries define the scope of application of the procedures. Since in IGT terms boundaries are about the eligibility of an actor to take on a position, the exclusion clauses belong to the setting rather than characters. Talking about exclusion clauses, consultation does not interact with the participatory process of the European Citizens Initiative and the neo-corporatist process of consultation of social partners.

Characters: The Narrator

The first character is the narrator. Who tells the story? It is the Commission. This character gives the cards to the players and defines authoritatively the subject matter: “stakeholder consultation is a formal process by which the Commission collects information and views” (European Commission 2017: 68). We find a voice that is formal, prescriptive, oriented towards a sort of legal intonation. The narrator puts emphasis on the formal nature of consultation and distinguishes it from the more generic provision of feedback. The register is definitively top-down and prescriptive – ‘should’ appears 61 times in the document.

Although the Guidelines open with a sentence referring to the simplicity of consultation (European Commission 2017: 67), the reader is warned that consultation is mandated by the Treaty (art.11) and the Protocol no.2 (on subsidiarity and proportionality) annexed to the Treaty. As most of the activities of the Commission, consultation is narrated via the lenses of legal requirements and steps that are mandated, prescribed and must take place. Well, after all this is the world of *formal* consultation – the reader has been warned right from the start.

And yet, there is a second register in the voice of the narrator. This is the register of tools, techniques, methods, smart ways of operating. It is in a sense a language reminiscent of the new public management register– the language of tools that make organizations smarter and capable of learning, as well as open to the world of affected interests. Previous work has indeed connected the late wave of new public management to the better regulation agenda (Radaelli and Meuwese 2009). Finally, in one case the narrator is unnecessarily humble – in contradiction with the other registers. This happens when we read in the introduction that the officers ‘should read these guidelines’ (European Commission 2017: 67). Certainly, the Commission expects the officers to implement the guidelines, not to simply read them!

Characters: The Lead Service and the Stakeholders

The second character we find is the officer, defined by position rules. Those who carry out consultation are asked to conduct an impressive range of activities, keeping the whole exercise balanced, open to different voices (from experts to religious communities), information-rich, useful and accountable. If this is not a hero, it is definitively someone with extraordinary commitment to the cause of level-playing field in consultation.

The Guidelines are directed to “officials” and “managers” but seems to prefer the language of “lead service” in charge of developing the consultation. This collective dimension is important also because at least in the case of consultation within impact assessment processes, the Commission rolls out the various activities via an inter-service group which includes the lead and the most concerned Directorates General and the Secretariat General.

It is indeed the Secretariat General that is responsible for launching all public internet-based consultations.

The third character is the stakeholder. This has some of the properties of the hero – it is the stakeholder who provides views, input and informative evidence. However, the Guidelines also warns on how these heroes can turn into villains when they capture the Commission’s officers (European Commission 2017: 76), orchestrate consultation campaigns (p.78) and when they pursue “special interests” (p. 68) as opposed to the “general public interest” (p.68). Incidentally, the Member States are also sort of villains when they pursue their particularistic interests (European Commission 2017: 68).

Plot

The plot is that good consultation informs policy with evidence, and over time, improves on the legitimacy of EU legislation. If we now read the plot in IGT terms, we find that it is made up of a combination of rules (mostly choice, information and scope rules). The scope rules define the central trajectory. They are defined as four general principles of participation, openness and accountability, effectiveness, and coherence. These central aims are achieved in the context of the minimum standards of clarity, targeting, publication, time limits and acknowledgement of feedback.

Let us now consider the rules that kick-off the plot in detail, starting with three broad choice rules: establishing the consultation strategy; conducting consultation work; and informing policymaking. In turn, each of the three phases contains additional rules: four on establishing the strategy (three choice rules and one information rule on the creation of the consultation page), four on carrying out the work (a mix of choice and consultation) and two choice rules on informing policymaking (synopsis report to support decisions and provision of feedback, which can also be considered an information rule). The narrator holds the hands of the officers, explaining in detail what the stages of consultation are and the specific rules of each stage, painstakingly. To illustrate: one rule contained in the rule ‘establishing the strategy’ is to ‘set the objective of consultation’. But the rule about the objective is then further de-composed into a mix of five choice and information rules. And

each of these five rules opens up a new set, for example the rule about establishing the context and scope of consultation includes five choices.

In this extremely dense rule-bound environment, the Commission concedes that all rules must be adapted to circumstances (not ignored or bypassed, but customized). Thus, on the one hand all the rules are described clearly and in detail. On the other, the narrator warns the reader that there has to be a degree of customization of the rules.

There are no payoff rules in the Guidelines. As for aggregation rules, the consultation strategy cannot be set independently by the lead service. It must be endorsed by the interservice group established for the policy initiative. The Commission draws on the beliefs and perspectives of different Directorates General to shed different lights on the monitoring process. This is in line with an approach that encourages an infra-organizational pluralistic process in policy formulation, to break down silo mentalities (Radaelli and Meuwese 2010).

The rules interact and become a plot through the category of time. Time is essential to provide narrative dynamism to actions and their consequences. Thus, the IGT is a fine toothcomb when it explains the plot as a constellation of rules. But, the NPF reminds us of that rules are played within a temporal narrative arc. Time is about the steps in the process. Officers are told what comes before and what comes after. The whole consultation guidance has a sequential nature.

Moral

What is the final purpose of consultation? What is reasoning behind it? The starting point of the moral is about benefits:

“The initial design, evaluation and revision of policy initiatives benefits from considering the input and views provided by citizens and stakeholders, including those who will be directly affected by the policy but also those who are involved in ensuring its correct application. Stakeholder consultation can also improve the evidence base underpinning a given policy initiative” (European Commission 2017: 68, our emphasis).

But there is also an element of threat: officers should invest time in consultation otherwise there may be problems later – legal or otherwise: “Early consultation can avoid problems later and promote greater acceptance of the policy initiative” (European Commission 2017: 68). Actually, this single sentence delivers on two components of the moral. One is ‘to avoid problems’. But the other is about legitimacy. Actually “legitimacy” is not featured in the document, instead we find “acceptance” that evokes an authority-subject relationship. And then there is the threat: if you, officer, do not listen to all this, remember that there are obligations set in the Treaty – consultation is not optional, it is a duty.

Table 2 summarizes our findings.

Table 2 – Consultation Guidelines of the European Commission: NPF and IGT compare

NPF	IGT	Findings
Setting	Attributes of the Community - Polity	Consultation as activity carried out across the whole life cycle of EU policy
Characters	Narrator	Two registers: prescriptive/legal and managerial
	Other characters	Lead service Stakeholders Secretariat General
	Boundaries	Boundaries applied to the process, not to characters
Plot	Choice, Information and Aggregation	Thick web of Nested rules across the sequence of consultation activities
	Scope rules	General principles Minimum standards
Moral	Combination of rules	We do it because of the benefits brought about by consultation: evidence-informed policy and legitimacy. But we also have a legal duty, and we want to avoid problems later

4.2 Finland

Setting

Consultation is set in the context of Finland as a multi-language state – where Swedish, Sámi-speaking and sign-language minorities must be included along with the Finnish majority is a reference point of the document which features in every section of the guidance. Indeed, over 10% of the document (in terms of words) is given over to linguistic inclusion of some form (see especially section 4). Beyond the protection of linguistic minorities, the experience of different age groups, gender and ethnic minorities and the disabled are all noted (Government of Finland 2016, e.g. sections 2.2.3; 3.2.1 and 3.2.2).

The problem of consultation is also set against Finland's broader international obligations – with the extension of the guide to cover the preparation of national laws for the implementation of EU legislation and international agreements (Government of Finland 2016: section 1.1). Yet, when we compare this single mention to the continual reminders of the diverse linguistic terrain policy officers must traverse, we can say that the consultation setting for Finland is sovereign and local as opposed to international, possibly because Finland is a standard-setter in terms of citizens engagement and participation.

Characters

Finland's consultation guidelines grant positions to all the expected characters: government (and its departments and agencies); public sector bodies; the civil service; organizations; citizens; stakeholders; experts, and companies. These usual suspects are passive characters, however; name-checked as potential participants and affected parties but not given any narrative distinction. Rather, there are two sets of characters that are worthy of that description: minority citizens and desk officers. We discuss them below.

The fact that minorities hold a central position comes as no surprise given what we learned about the setting. But, how can we be sure this is not some cosmetic exercise? Two features of the characterization offer assurance. First, the individual needs of each minority group regarding consultation are worked out and, on occasion, a minority group is broken down further into smaller sub-groups (in particular regarding language). Thus, the common pitfall

of assuming homogeneity of minorities is avoided. Second, the boundaries of these categories are delineated with great care (Government of Finland 2016: sections 4 and 5). Such care suggests a sincerity of mission that goes beyond name checking. What kinds of characters are these minorities? We would hesitate to go as far as saying these minorities are heroes or victims. The absence of adjectives or emotive language in the guidelines means we cannot go this far. That said, the inference we can draw from these populations deserving 'special attention' and being 'at risk of being excluded' (Government of Finland 2016, see section 2.2.3) suggests these are portrayed as potential victims whose victimhood can be averted by good consultative practice.

Now to the second major protagonist in this story. The desk officer or the 'drafter', as they are referred in the document, is assumed to be the primary reader. This assumption is not simply a matter of logic – though we are on safe ground since these guidelines do serve as a 'how to' for those bureaucrats designing consultations. Moreover, the narrative is punctuated by moments when the drafter is spoken to almost directly. Most frequently, they are offered advice and reminded how important their actions are for the success (or otherwise) of the work: '[T]he presence and commitment of the drafter is important: it is especially needed in discussion and summaries' (Government of Finland 2016: section 3.7.2). More prosaically, the drafter is reminded that they personally should be associated with the consultation with their contact details on the website.

The document's author is never revealed; rather we have a nameless narrator who serves as a shadow character: always there but unidentified. But, the presence of this nameless narrator is strong and consistent. Though they are an anonymous character without name, they are omniscient when it comes to consultation. And, much like in ancient allegorical tales, this nameless narrator's purpose is to supply the clear pedagogical voice that runs throughout the story. This voice takes two forms: the pedagogical preacher and the pedagogical teacher.

The pedagogical narrator as preacher who aims to sell the vision of what consultation in its best form (i.e. inclusive) can achieve for the content of the policy and its wider social legitimacy. For example,

“[T]he principle of transparency must always be borne in mind when consulting and planning it. When using different methods of consultation, equal treatment of stakeholders and citizens must always be ensured ... Consultation and communication must always have a goal. Often the objectives are primarily related to information needs, but the importance of interaction in the process as such should not be forgotten. Interaction increases trust” (Government of Finland 2016: section 2.2.2, emphasis added).

The narrator also plays the traditional pedagogical part of teacher, instructing the desk officer on the nuts and bolts of ‘how to’ run an inclusive consultation – which are supported by copious exemplars in annexes. The teacher voice is unmistakable. The instructions lack equivocation, certain tasks are frequently marked as ‘important’ and ‘essential’ and the consequences of taking short cuts are spelled out.

Plots

Constructed using choice and information rules, Finland’s consultation guidance plot structure (revolving around choice and information rules, there are no aggregation rules) contains one central master plot which is supported and elaborated with three sub-plots. Taking the master plot first – expressed through choice rules – the core causal story imparts the rational vision of evidence-based policy-making (EBPM). By undertaking a certain set of clear analytical steps – which mirror the traditional idea of the policy cycle (Government of Finland 2016: sections 1 and 2) – consultations can deliver better policy results and social legitimacy.

This EBPM master plot is closely supported by a more detailed sub plot on precise ‘how to’ instructions. At points, the guidelines read like a ‘101’ methods guide. The document is full of exemplars and ideas about running a consultation and pitfalls with methods. Importantly for the NPF, these information rules are always linked back to a teacherly explanation of why they matter for the success of the consultation: this is the path to inclusivity and this is how you (officer) deal with the volume and diversity of stakeholder inputs that you want to encourage.

This lesson in the art of convening is supported by a further sub-plot on the temporal dimension. Structured with choice and information rules, time is presented as central to the

success of inclusive, fair and evidenced-based consultations. Specifically, time is conceived of in a sophisticated way – it is multi-dimensional and should be understood from the stakeholder point of view not tied to the timetable of the desk officer. The guidelines discuss six dimensions of time that are mission critical – upstream; during; untimetabled time; exceptional circumstances (e.g. holidays); planning time throughout the consultation life course and finally feedback (Government of Finland 2016: sections 1.4, 3.3, 3.6, 1.7-1.9, 2.3.2, 3.2.2). On feedback, the need to close the feedback loop with stakeholders is continually referenced.

There is one final sub plot that supports the EBPM causal story: warnings that shortcuts should be avoided. We find many moments where the temptation to deploy a shortcut is anticipated and warned against, such as: “multi-member preparatory bodies are not a substitute for other consultations, which provide an opportunity for non-preparatory parties to participate and influence what is being prepared” (Government of Finland 2016: section 3.2.1). These warnings address two themes about preventing cosmetic exercises: (1) inclusion being attempted in a comprehensive way and (2) consultations’ timelines being open enough to allow real participation. Note, they do not tell us about any sanctions or payoff rules.

Wrapping up, there is a learning model implicit in this plot – our teacher narrator gives the desk officer clear instructions but these are always accompanied with an explanation about the logic behind those instructions, their multiple temporal dimensions and the obvious shortcuts that will undermine the consultation.

Moral

Throughout the guidelines, the possibility that inclusive consultations (if they follow the rational EBPM master plot) can create the conditions for fairness and trust are continuously evoked:

“The aim of the consultation is transparency and good quality in the preparation of legislation. The purpose of the consultation is to identify the various aspects, implications and practicalities of the matter to be prepared. Consultation enhances confidence in democratic decision-making and legislation and promotes

compliance with standards. The consultation will also strengthen the realization of civil and political rights” (Government of Finland 2016: section 1.2).

“The acceptability of decisions improves with the experience of inclusion, and being consulted engages stakeholders not only in preparation but also in implementation and monitoring” (Government of Finland 2016: section 3.1)

Here we have the preacher voice of our nameless narrator selling the vision of what consultation in its best form (i.e. inclusive) can achieve for both the content of policy and social legitimacy. This is a kind of promissory narrative (see the sociology of expectations literature, especially Brown and Michael 2003): fairness (equality and transparency) in the consultation has emancipatory potential for policy and participants.

Information rules are similarly linked to the fundamental goal of consultation: inclusion and fairness. There are four informational rules that are tied to this policy solution: clarity, minority languages, communication medium and, consultation methods.

Furthermore, when we consider the guidance on minority language inclusion, we also find the suggestion of a payoff rule where “[P]roceedings may be delayed if the documents are not available in both Finnish and Swedish” (Government of Finland 2016: section 4.2). table 3 summarizes the findings.

Table 3 – Finnish Consultation guidelines: NPF and IGT compared

NPF Core Features	IGT Rules	Findings
Setting	Attributes of the Community - Polity	Inclusion of minorities (especially linguistic) International obligations
Characters	Positions Boundaries	Usual suspects – government and civil society policy actors Potential victims – minorities Reader – drafters Narrator – nameless but omnipresent
Plot	Choice Information	Master plot – evidence-based policy approach (EBPM) to consultation yields inclusive and fair results Sub-plots – how to guides are fundamental; time is multi-dimensional; shortcuts can lead to failure
Moral	Scope Information Payoff	Inclusive consultations create social legitimacy and trust Care in communication has consequences for legitimacy and trust Failure to adhere to language rights may result in delay

4.3 Ireland

Setting

In the words of the narrator, consultation is painted on the broad canvas of a major effort to modernize governance. The document, significantly entitled “Principles and Guidelines”, is conceived in the setting of wider governance reforms of establishing a “legislative footprint” to track legislative initiatives, consultation, publications of draft bills, pre-legislative scrutiny by Parliamentary Committees, submissions received and meetings held with stakeholders. Another reference is to the “Principles and Guidelines” as implementation of the review of national and international practice to develop engagement and consultation with citizens, civil society and others by public bodies (DPER 2016: 3). The settings are well demarcated by the metaphor of the legislative footprint and the reference to international good practice. Like in other cases, boundaries do not refer to the eligibility of the actors, but to exclusion clauses – when consultation is not applied.

The Main Character: The Narrator

The narrator is the main player with a position above all the other characters. It’s the narrator the character that defines the rules of the game. We find a pedagogical narrator that instructs on what a good consultation should be. The narrator is prescriptive and top-down – the word ‘should’ appears 65 times. The reference to the Principles (and not just Guidance) provides a sort of *gravitas*. Despite the solemnity of the narration the narrator does not speak with a legalistic tone. Adjectives such as ‘clear, real, meaningful, proportionate and genuine’ reveal a narrator that is prescriptive but not formal. Indeed, in three different occasions the narrator decides to start a sentence with the term ‘Ideally’ and ‘It may be best’ – expressions that indicate an attempt to informality. The voice of the narrator emphasizes also other aspects that do not have a legal intonation, such as the ‘footprint’ metaphor.

Other Characters

The second character is impersonated by the Government, the Government Departments, Officials and Public Bodies. The document is written precisely for this set of actors in order to educate them. The government and the departments are considered as a single main

character and the guidance sets obligations that the characters must follow. 'Governments should', 'The Department will', 'Officials should'.

The third character is represented by the stakeholders which are however somewhat a peripheral presence. The narrator never refers directly to stakeholders. Stakeholders are part of the narration, but their role is limited to those who are assisted, 'involving stakeholder' is the main sentence that we find in the text related to this character.

Plot

Consultation delivers a plot of systematic engagement and efficiency – because consultation can “reduce the burden of engaging with Government on policy development and implementation” (DPER 2016: 6). The plot has a higher-level plane concerned with “a greater sense of political efficacy”, “confidence” (DPER 2016: 4) and legitimacy to achieve real world impact and knowledge sharing - this is the language of a solemn plot.

Scope rules are, in fact, plentiful. Consultation should be genuine, meaningful, timely, balanced and with the ultimate objective of leading to better outcomes and greater understanding (by all affected interests) of the benefits and consequences of proceeding with a given policy proposal. The plot leads to a scenario of “real, meaningful, and targeted engagement” (DPER 2016: 3).

Apart from scope rules, we find the plot revolving around choice and information rules. Amongst these rules are those about the identification of the stakeholders, the decision to proceed, to receive and analyse feedback and review the consultation process. The rules extend to the broader activities that link consultation to the legislative footprint, lobbying, the treatment of personal data. Information rules cover the publication of submissions and providing feedback.

The plot can be summarized as follows: Consultation is a systematic process of meaningful engagement with those outside the policy-making process that support the evidence-base of the process. Its outcome is political efficacy, but there are also fundamental good governance outcomes such as confidence and trust in legislation. Citizens benefit from the wider, open knowledge-base of policies and awareness of how decisions emerge.

Moral

The moral of the story is that consultation, beyond its benefits in terms of EBPM, has a point in terms of diffusing “a culture of innovation and openness by involving greater external participation and consultation” (DPER 2016: 4). This is reinforced by the dangers of non-correct procedures: “Officials should be mindful of the need to consult with each other to avoid creating cumulative or overlapping regulatory burdens” (DPER 2016: 6).

Table 4 – Ireland’s Consultation Principles and Guidelines: NPF and IGT compared

<i>NPF</i>	<i>IGT</i>	<i>Findings</i>
Setting	Attributes of the Community - Polity	Consultation is part of the movement towards good governance, a legislative footprint and international good practice
Characters	Narrator Other characters Boundaries	Narrator is prescriptive but not legalistic Character 1 Government, Government Department, Officials, Public Bodies Character 2 Stakeholders Boundaries applied to the process (exclusion rules)
Plot	Choice Information Aggregation Scope	High number of choice and information rules. These are actions that describe what Character 1 tells Character 2 to do Several rules with the aim of reaching real, meaningful, targeted engagement
Moral	Combination of setting and all rule types	Consultation promotes a culture of innovation and openness

4.4 Malta

Setting

The setting of consultation in Malta is not particularly wide as the procedure does not apply, as an obligation, to all legislative or regulatory initiatives and proposals. Consultation,

indeed, is employed on a case-by-case basis drawing on ministerial discretion. To put it with the guidelines' wording, ministries are not bound by consultation (OPM 2011: p. 8) and so enjoy a great deal of discretion on whether launching it or not. Once a government entity decides to launch a consultation exercise, though, the guidelines are very specific.

Characters: One Dominant Position

As a result of this specificity, the intonation of the narrating character is formal, prescriptive and top-down, but it is not engrained in legal requirements (like in the case of the European Commission) – rather in procedural advice. In contrast to Finland, the narrator, while elaborating on the typologies of consultation, does not address and engage directly all the other characters involved in the exercise (stakeholders, minorities and marginalized groups) but, like in Ireland, talks only to the main character of the story, that is, the considerate civil servant. Though they elaborate on other characters while unravelling the main plot, the narrator puts themselves in a dialogic relationship only with the government entities they aim to instruct by narrating the 'consultation exercise' tales. This is corroborated by the very fact that consultation guidelines are not publicly available through a governmental website. This makes the whole document and the narrative included somewhat esoteric. It is a clear indicator of the internal use of the guidelines – and of the narration thereof. Finally, stakeholders and societal actors do not hold specific rights to be heard. In IGT terms, the stakeholder position is created but choice rules are always those of the public administration.

The focus on government entities is reflected by the paucity or even absence of clear boundary rules. Boundary rules are absent because the decision of what stakeholders to engage is a discretionary one of those who carry out consultation. As mentioned, consultation is not mandatory, and thus setting boundaries around a non-requirement is unnecessary.

Parameters as plot

It's telling that the document is called 'parameters' – in stark contrast to the solemn Irish 'Principles'. A parameter defines an activity or the conditions of operations of a system. A rule prescribes behaviour. Since the narrative is centred on one dominant character, the choice and information rules are the parameters to be considered by the considerate civil servant. The inward-looking nature of consultation shows also in the fact that the few aggregation rules that exist cluster together governmental actors (inter-institutional consultation) rather than stakeholders, citizens and minorities.

Three sub-plots, which belong to the main 'consultation exercise' plot, are carefully narrated. These subplots are national consultation, sectorial consultation and restricted consultation. Once selected a path, the narrator prescribes its steps for the government entities, but always in the context of a discretionary procedure.

This leads us to the logic of consultation guidelines in Malta, that is, educating government entities about the paths (and plots) to successful consultation while using a sub-plot of embarrassment as a warning:

“Before commencing an external consultation exercise, it is important that the issue being discussed is researched in order to be in possession of the best information, It can be very embarrassing for a Ministry or Entity and ultimately all of the Government to present an inaccurate or outdated policy, which will be highlighted during the consultation process” (OPM 2011: Section 04)

The presence of this sub-plot where the uninformed governmental entity is implicitly and emotively portrayed as the possible villain allows us to advance two considerations. First, the potential hero of the consultation tale is the careful civil servant who conducts sound consultation exercise as per the guideline and hence is not unprepared and embarrassed vis-à-vis the stakeholders. This is reflected in a plot whereby the main agent is always the public entity which is addressed in a genuine 'how to' style by the guide (note also the use of tables, flowcharts, tips and examples). Secondly, the narrator impersonates the role of the preacher (as we found in Finland) who puts forth cautionary tales and warns the main character about the mistakes to avoid and the best practices at hand. This is exemplified

also by the presence, disseminated all along the document, of a series of boxes, cases and examples that sound and work like parables or edifying examples, representing a parallel sub-plot along the three main sub-plots.

Importantly, the main character/hero is clearly the government entities which will carry out consultation in practice, whereas for instance in the Finnish case space is also made for the stakeholder with the public administration (PA) working somewhat on their behalf. Instead, in Malta the guide serves the purpose of instructing the PA while the benefits to the stakeholders seem to be ancillary or a by-product of the action of well-conducted civil servants.

Moral

The moral is hence that by following the informed guidance the considerate public manager will conduct successful consultation exercises whereby success is measured mainly by the adherence to the requirements of the guide itself rather than by the satisfaction of the stakeholders. The latter are broadly epiphenomenal to the narrative which sees the narrator and the hero in a strict dialogic relationship and the other agents covering mainly exogenous roles. This is also reflected by the fact that the main beneficiary of consultation is the public administration itself which, by following the wise advice of the narrator, is capable of extracting the best stakeholders' feedback and hence help the government achieve the best policy making solution (PPM 2011: 4). Or, to put it differently, good consultations ensure more transparency which increases the acceptance of government initiatives. Benefits are always inward-looking. The main findings are portrayed in table 5.

Table 5 – Malta - Parameters for Consultation Exercises with Stakeholders: NPF and IGT compared

NPF Core Features	IGT Rules	Findings
Setting	Attributes of the Community – Polity	The guide, called Parameters, has an internal use, hence the setting is limited to an intragovernmental space although the role of consultation should be to open government up
Characters	Position and Boundary rules	Three characters: the narrator and the Since consultation takes place on a discretionary basis, the Parameters do not set boundary rules
Characters	Position and Boundary rules	Three characters: the narrator, the government entities and the stakeholders. The characters are not bound
Plots	Choice and Information rules	The agent of choice and information rules is always the main character, i.e. the government entities. The plot is for a single character.
Moral	Scope rules	The prescribed outcomes benefit in the first place the main character with the expected benefits of consultation on the stakeholders coming as by-products

5. Conclusions

Our exercise shows that the dialogue between the NPF and the IGT is possible. Theoretical frameworks and tools can be compared (Schlager and Blomquist 1996) but policy researchers can also travel from one to another. This makes sense when, like in our case, they exhibit elective affinities like the emphasis on language. We have not showed integration, but, more humbly, we provided a demonstration that a conversation is possible. We found how to translate the plot into a set of rules and how to use time to give dynamism to the rule types. These results suggest that the conversation is not only possible, but also productive.

The next step is to move the translation to the higher theoretical plane of integration – of course, when this makes sense and increases explanatory leverage. We have seen the benefits of translating concepts in terms of refining categories and improving on precision. But we cannot, at this stage, argue that an IGT-NPF integrated framework would deliver more theoretical or empirical leverage.

Apart from this central conclusion, there are also lessons about policy design. Consultation guidance is designed with few aggregation and payoff rules – revealing procedures that are

likely to become ritualistic and symbolic unless there is political commitment at the top of the government. The narrations also show the diversity of government styles, from the Maltese case of internal dialogue between government and civil servant, Finland's pedagogies on inclusion, to the grandiose scenario of Principles in Ireland. The EU shows its DNA of entity that, because of its democratic deficit, must operate within a web of nested norms that define a plethora of choice and information rules.

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