Institute for Government, the Alliance for Useful Evidence and Sense about Science—Written evidence (LEG00008)

1. There is a recognised need for better use of evidence in policymaking and also for greater transparency about the evidence used. The benefits of this are:
   - To reduce ill-founded claims and assumptions
   - To ensure citizens are properly informed
   - To enhance scrutiny and accountability
   - To increase the impact of the research that government pays for
   - To make the best use of resources and opportunities.

2. There is not, however, sufficient appreciation of the importance of transparency about what evidence has been used and how. Over the last few parliaments there have been significant moves to promote both the better use of evidence and justification of policy decisions, including What Works Centres, the Office for Budget Responsibility, the Regulatory Policy Committee, the Civil Service Reform Plan, and the Open Government Action Plan. However, these fall short of a transparent systematic method for assessing the use of evidence across the full range of government policymaking.

3. In 2015, at the suggestion of the Cabinet Office What Works Advisor, David Halpern, our three organisations accepted the challenge of developing a rapid assessment tool to rate government departments on the use of evidence in making policy decisions. Initial testing revealed a prior challenge: that it is often not possible to see what evidence has been used or the basis for the assumptions being made in a policy proposal. To address this we developed a framework to assess the transparency of evidence used in policymaking. This was published by the Institute for Government (IfG) in October 2015.¹

4. Sense about Science, in partnership with IfG and the Alliance for Useful Evidence, then led testing and revision of the framework and a benchmarking exercise to identify good and bad practice by government departments on policies announced between May 2015 and May 2016. The results of this are due to be published by early November 2016. Meanwhile the House of Commons Science and Technology Committee has used the framework for “evidence check” exercises to interrogate government over its use of evidence in nine policy areas – and produced its first report, on smart metering, in which it expressed concern about government’s ability to identify its evidence base:

   “The Government’s difficulty in engaging with the evidence check framework suggests that in some departments there is a lack of experience of articulating the evidence base for its policies. More worryingly it may also indicate that some areas lack the necessary evidence base.”²

¹ Show your workings: Assessing how government uses evidence to make policy, Jill Rutter and Jen Gold, Institute for Government (http://www.instituteforgovernment.org.uk/publications/show-your-workings)

The evidence transparency framework

5. The evidence transparency framework aims to establish (without specialist knowledge of the subject) the chain of reasoning in a policy proposal. For the purposes of benchmarking, we have modified the original framework published in 2015, to include value for money under both proposal and implementation. We have also developed the language and guidance in response to engagement from departmental chief scientific advisers, directors of analysis and parliamentary committee specialists. It looks at four areas:

a) Diagnosis – can we see what the issue is that will be addressed and how it has been assessed;
b) Proposal – can we see what underpins the government’s chosen intervention, and how evidence has been used;
c) Implementation – can we see what underpins the choice of implementation and why, and is it possible to see the assumptions underpinning the assessment of policy options;
d) Testing and evaluation – what has been tested already, what further information is sought, how will it be used and how will we know if the policy has worked?

6. The evidence transparency framework is designed to be applied to individual policies and their associated documents. We defined a policy as a specific intervention to change the status quo. It may be something announced as part of a package of measures. In defining it in this way we aim for what is intuitive for the public and the way policies are presented in announcements. We do not expect the public or parliament to have to ‘dig’ for evidence – it is the responsibility of government to make it readily accessible through inclusion, discussion and clear links and references.

7. The evidence transparency framework is designed to assess documents associated with policies on the first occasion when the government substantively sets out the proposed intervention in public prior to implementation. It is central to transparency and to enabling scrutiny and engagement with the policymaking process that supporting evidence is available at this stage. For example, material that was prepared for the third reading of a bill would not be considered if it was not available when the bill was first published.

Assessing the government’s transparency in use of evidence

8. Following publication of the initial review of good and bad practice in policies announced May 2015-May 2016, we plan to undertake a further review of the period May 2016-May 2017 to produce ranked departmental scores.

9. In undertaking the good and bad practice review, we noted that it was particularly difficult to locate policy initiatives for each department, their associated documents and context or to discover the progress of previously announced plans. This is because departmental websites have been removed in favour of amassing everything at .Gov.uk, which is geared towards people finding passport forms or tax returns and does not at all facilitate public (or parliament or subject specialist) engagement in policymaking. The Government Digital Service is aware of this problem, and frustration it causes in and outside of government, but reports a lack of central resource and drive to resolve it.

10. We would be happy to share full details of our first review of transparency with the committee. Observations include:
a) In a lot of cases departments failed to disclose the evidence they had in fact prepared and analysed well. This is wasted work when it cannot help the public or parliament understand or scrutinise the reasoning behind a policy. It also removes the possibility of a sensible debate on the quality of the evidence base on which the government is basing its policies.

b) Manifesto commitments do not necessarily give rise to lack of transparency about evidence. Manifesto commitments that are implementation-focused (ie where the manifesto made a commitment to a very specific method of tackling a problem) are often less transparent about evidence than those where the commitment was more open-ended and outcome-oriented.

c) Standards of citation and referencing are highly variable within and between departments.

Parliamentary scrutiny
11. There is a particular role for Parliament in holding Ministers to account for the evidence base behind policy, via mechanisms including pre-legislative scrutiny, select committee inquiries and evidence checks. Parliament cannot perform its scrutiny role properly if the government is not transparent about what evidence is used and what role it has played. We urge the committee to give consideration to transparency aspects of evidence use and to look at what can be done to encourage wider appreciation of the impact of that on meaningful scrutiny and improvement.

12. Parliament should also hold Ministers accountable for being much more rigorous in post-implementation reviews of policy. This is an important role committees can play and it is disappointing that committees do so little of this. The Constitution Committee proposed both greater parliamentary scrutiny and post-implementation reviews of policy in its 2004 report. We believe our evidence transparency framework could be helpful with these. The framework equips parliamentarians with the right questions to ask when examining draft legislation and policy proposals. The framework is designed to be applied rapidly; we believe this tool could be an effective and efficient use of parliamentarians’ limited time.

Public engagement and provision of information
13. Government should also be clear about how it uses, or will use, consultation responses. Doing so could enhance public and stakeholder engagement and contribution.

14. Transparency about the use of evidence and the reasoning behind policy and legislative proposals is essential for enhancing parliamentary scrutiny and public engagement – it allows people to understand how government is making decisions. To achieve this government should set out its thinking in the earliest stages of proposing policy or legislation, as this is when engagement can be most meaningful. Parliament has a vital role to play in demanding government transparency, on behalf of both its members and the public.

Background
The Alliance for Useful Evidence promotes the use of high quality evidence to inform decisions on strategy, policy and practice in the UK and beyond. We do this through advocacy, research and capacity building, and we work with partners in national and local governments and civil society to encourage debate, discussion, collaboration and innovation. The Alliance is funded by three partners: The Big Lottery Fund, the Economic and Social Research Council, and Nesta. To join our growing network of 3,000 individuals and organisations supporting the use of evidence, visit www.alliance4usefulevidence.org/join.

Sense about Science is the UK independent charity that challenges the misrepresentation of science and scientific evidence in public life. We advocate for openness and honesty about research findings, and work to ensure the public interest in sound science and evidence is represented and recognised in public discussion and policymaking.

The Institute for Government is an independent charity working to increase government effectiveness. We work with all the main political parties at Westminster and with senior civil servants in Whitehall. We undertake research, provide development opportunities for senior decision makers and organise events to invigorate and provide fresh thinking on the issues that really matter to government.

13th October 2016