9. Organizational Political Capacity as Learning

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Abstract

In this chapter, we examine how agencies build organizational political capacities (OPC) for reputation management, where capacity building is treated as a challenge underpinned by the learning relationships that exist between key governance actors. This challenge requires the development of four types of OPC: absorptive capacity (ACAP); administrative capacity (ADCAP); analytical capacity (ANCAP) and communicative capacity (COMCAP). Analytically, we link each of these capacities to one particular type of policy learning—reflexive learning—which characterizes politicized situations where an agency's reputation is under threat and citizens are the main governance partners. Empirically, we demonstrate how agencies learn to develop these OPCs with governance partners using the case of the UK Health and Safety Executive (HSE) which increasingly aims to engage citizens in a dialogue to combat the negative images attached to health and safety regulation. We conclude by asking what a learning approach tells us about how agencies can develop OPC.

9. 1. Introduction

In this chapter we examine how agencies build organizational capacities to manage their reputations. The literature on organizational capacities does not treat them as simply static skills or resources. Rather, capacity-building challenges—i.e. what capacities are required and whether or not they are successful in policy delivery—are mediated by a range of contextual factors. In particular, capacities are held in the relationships between different governance actors. Given the array of different organizational capacities and governance relationships that can exist, this chapter focusses on organizational political capacity (OPC) construction (Wu et al., 2015). We treat capacity as held in dynamic learning relationships that exist between policymakers and citizens. We relate OPC to one type of policy learning – reflexive learning. This is learning in the realm of 'wicked issues' (Rittel & Webber, 1973) where agencies' control over policy definition and implementation is uncertain. Here problems are

incomplete, and 'right' and 'wrong' solutions are replaced by a multiplicity of policy options offered by citizens that claim expertise. Such cases are often complicated further by the amplification role played by the media. These politicized conditions are ripe for policy failure and the politics of blame (Hood, 2011) where government agencies become the focus of dissent. In such circumstances, the challenge for reputation-sensitive agencies is to find ways to engage society, and explore the variety of interpretations attached to the issue at hand. Critically, policymakers must recognize that in such reflexive settings their control over problem definition and policy solutions may be weak. Here, the agency's OPC is critical both for future policy success and the agency's reputation.

But just as policy learning is not monolithic, nor is OPC. Therefore our chapter addresses the following question. What particular OPCs are required in reflexive learning environments? We construct an analytical framework that outlines the four main learning relationships found in the policy world and use this typology to differentiate between the types of OPC that matter and when. Why take a learning approach to organizational capacity? We know a good deal about the ideational dimension of policy learning, but scholars have largely neglected the organizational dimension (Borrás, 2011). Yet, it is only by making these connections that we can hope to illuminate the relationship between governance and learning (Schout, 2009). Examining capacity building through the policy learning lens acknowledges it as a fundamentally dynamic exchange— where different learning environments enable new capacities to be acquired, and capacity in turn enables policy learning and change.

Empirically, the chapter examines this in relation to an innovative UK health and safety communications initiative: the 'Myth-Busters Challenge Panel' (MBCP). Launched in 2012, by regulator the Health and Safety Executive (HSE), the MBCP is a high-profile campaign that aims to engage citizens in a dialogue about the negative images that have become attached to health and safety regulation in the UK. Indeed, in the last decade, public scepticism is such that the expression 'health and safety gone mad' has entered common parlance to express exasperation about almost any rule—real or fictitious—that businesses, local authorities and citizens think an unnecessary intrusion. Three key drivers of this recent negative branding have been identified (Dunlop, 2015). Health and safety regulations are erroneously cited by businesses and local authorities due to: uncertainty of the law and fear of compensation claims; the desire to reduce costs and prevent citizens from accessing goods and services; and finally, poor communications skills and the desire to avoid an argument by giving a genuine explanation.

In an effort to rebuild the public image of health and safety regulation, and the reputation of the Health and Safety Executive itself, the MBCP aims to

connect with citizens, businesses, the media and local authorities by inviting them to submit examples where health and safety has been used to justify action or inaction which they view unreasonable or suspect. These cases are then referred to a dedicated panel of experts who investigate the case, gather additional evidence and adjudicate. Where health and safety 'myths' are identified, the agency uses the cases—many of which are absurd and on occasion hilarious—as part of its wider communications strategy. In some circumstances, the agency also works with the parties involved to generate mutual learning and develop a corrective strategy. The ultimate goal of this initiative is to enhance the health and safety policy regime and defend the agency by building a social consensus around what protective, desirable and high public value health and safety looks like.

After three years of operation and the identification of nearly four hundred 'myths', the agency is now exploring the logic of its communication with the public, how its impact can be assessed and how its communication strategy should be developed. This chapter marks the first academic assessment of the initiative, and draws on ethnographic research and elite interviews with the MBCP's policy, analytical and communication officers conducted by the author from September 2013 to September 2015.[1] Why should we care about this case? While concerted public communications strategies by agencies are common in some countries—especially the United States—it is rare for a UK regulator to engage citizens in a direct dialogue. It is rarer still for a researcher to have a front row seat to witness this 'live' episode of capacity building. The importance of this access to the HSE team is pivotal for our analytical approach. Treating OPC building as a function of learning relationships demands that we understand the views of elite policymakers and how they interpret their context.

The chapter is structured as follows. Section 1 defines the capacity challenges faced by the HSE as a function of learning in governance relationships. Section 2 outlines a policy learning typology and specifically the reflexive form which characterizes wicked issues where agencies must learn how to engage citizens (Dunlop & Radaelli, 2013; Dunlop, 2014). Section 3 puts the spotlight on reflexive learning, using typological analysis to expand the concept to identify four specific ways in which government agencies interact with society. Section 4 then links these to different capacity challenges. Specifically, reflexive settings require that agencies learn how to: listen to what is going on in society; offer their own interpretations; understand how social interpretations relate to the agency's policy goals, and, most challenging of all, engage in dialogue with society to construct a consensus. In short, they must learn how to deploy and develop four types of OPC—absorptive, administrative, analytical and communicative. Our empirical analysis focusses on the impact of different

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[1] All 13 of the agency officials involved in the MBCP initiative have been interviewed for this research.

learning environments on the HSE's ability to develop each of these capacities in their engagement with citizens about social beliefs on health and safety, and how these capacities might in turn change the policy learning environment. We conclude by asking what a learning approach tells us about how agencies can develop OPC.

9. 2. Building Organizational Political Capacity in UK Health and Safety Policy: A Problem of Learning

Despite being a long-established research theme in the private sector management literature, public organizations' reputations have only begun to be seriously considered in political science in the last 15 years. Daniel Carpenter (see 2002, 2010) has been primarily responsible for the systematic treatment of regulatory agencies and reputation, theorizing in particular about how agencies build good reputations to increase their autonomy. Specifically, his seminal work on the US Food and Drug Administration (FDA) has generated a key insight around which a research agenda is now being built (see Maor, 2015 for an overview of the key themes). Here, in a nutshell, is Carpenter's argument: "…when trying to account for a regulator's behaviour, look at the audience, and look at the threats" (Carpenter, 2010, p. 832, emphasis in original).

What does this mean for the object of our enquiry—the HSE? This agency is an independent regulator for work-related health, safety and illness. Established in 1974, its core mission is to reduce work-related death and serious injury in the UK's workplaces. The HSE enforces the Health and Safety at Work Act (1974) and associated regulations by: issuing improvement notices which, if breached, can result in prosecution (in 2013/14 the conviction rate was 95%); co-regulating with local authority inspectors to enforce regulations; providing specialized inspections; and, conducting research on new workplace risks. Since its establishment, workplace deaths and injuries in the UK have fallen by over 87% (HSE, 2014). Despite this stellar biography, since 2010, the HSE has been under sustained political pressure from the central government. Its core functions have been reviewed three times as part of the Conservative-led coalition government's drive for regulatory simplification and smaller government (O'Neill, 2013; for the reviews see Löfstedt, 2011; Temple, 2014; Young, 2010). Central to these reviews is the need for the HSE to address the public perception that health and safety regulation is intrusive and over-bearing.

HSE has four main audiences, each of which carries multiple expectations: experts that scrutinize its scientific analysis; courts that adjudicate on contested decisions; stakeholder groups of implementers and the regulated; and the wider society that the agency aims to protect. The capacity-building challenges involved with each audience are structured differently. Notably, some relationships are more insulated from political and media pressures than others,

making them easier for HSE to manage. Our analysis focusses on arguably the greatest OPC challenge faced by all agencies—learning with citizens. Citizens encounter health and safety regulations every day, and they do so in one-off exchanges. The high degree of implementation uncertainty that goes with this open environment makes it highly susceptible to political and media moves, making this the HSE's biggest challenge.

This uncertainty, along with the compensation and media blame cultures and political paradigm emphasizing the unwelcome prevalence of regulatory burdens, provide the conditions for health and safety to become a socially contested issue. In the last two decades, this contestation has manifested itself in the appearance of the meme 'health and safety gone mad', which is commonly used by citizens, the media and politicians (see Almond, 2009 for a discussion). In 2007, the HSE began to experiment with a communications strategy to engage the public that lampooned some of the most absurd media stories where health and safety rules—real and imagined—were used by public and private service providers to excuse unpopular or ill-informed decisions. To give a flavour of these 'myths of the month', one recurring case concerns local councils banning floral display hanging baskets in the name of health and safety regulations (Almond, 2009). No such regulation exists; rather health and safety is used as a fig-leaf to cover the real concern that these baskets may fall and injure a member of the public and leave the council open to civil legal action.

The regulator has acted to defend its reputation, and that of the policy regime more generally, by consciously engaging citizens in a learning relationship. In the UK, health and safety legislation is not prescribed. Rather, it is goal-oriented and, as such, what compliance 'looks like' on the ground is locally negotiated with specialist HSE inspectors in local authorities and the general public. This reliance on how health and safety is perceived outside the agency means that a common policy understanding cannot be powered but rather must be puzzled (to paraphrase Heclo, 1974).

And so, the agency believes that its only option is to build capacity by learning with citizens about the pre-eminent social beliefs and discourses that surround health and safety. Such learning relationships are just that—two-way interactions. The agency cannot simply focus on what its governance partners can be taught. Rather, capacity-building becomes about the understandings that all governance parties can generate through their interactions.

In 2012, the HSE intensified its efforts to engage with the public and gather more health and safety myths by establishing the dedicated MBCP. While media stories are still included, the majority of the MBCP cases come from members of the public who complete an online questionnaire on the HSE's

website.[2] Between April 2012-April 2014, 920 submissions were made with 304 of these ruled to be 'myths'. Despite these myths' frivolous nature, the 'health and safety gone mad' meme threatens the HSE's reputation. Agencies' reputations relate to their specific domain of expertise; the HSE does not have a strong or weak reputation in general, it has a reputation in relation to health and safety (Maor, 2015). The erroneous labelling of trivial decisions or silly rules as driven by health and safety regulations undermines the credibility of the HSE, and risks all health and safety measures becoming characterized as against the public interest, and undermines the agency's reputation in government and beyond. For example, here is Prime Minister David Cameron pledging a multi-pronged approach to cut back what he labels the 'health and safety monster' in the UK: "[Y]ou have got to look at the quantity of rules, and we are cutting them back. You have got to look at the way they are enforced, and we are making sure that is more reasonable" (in The Guardian, 5 January 2012). While not quite as damning as Newt Gingrich's 1994 verdict that the FDA was the US's "number one job killer" (Carpenter, 2010, p. 731), when added to the weight of formal reviews, budget reductions and increased workload the HSE's reputation has been weakened (O'Neill, 2013).

The empirical reality for the HSE chimes with Carpenter's core argument about the centrality of these external threats, and the role played by political principals in stabilizing and destabilizing agencies. Yet, agencies' reputations may not be as fragile and exogenously determined as Carpenter suggests. Notably, Maor argues that scholars must explore agencies' ability to respond to threats and act "adaptively, strategically and opportunistically" to maintain, protect and (re)build good reputations (2015, p. 17). Indeed, this is what much of the literature does. Built on rational choice explanations, scholarship on bureaucratic reputation focusses on the strategic development of organizational capacity in these responses. Agencies variously manage their reputation through: the strategic use of knowledge (Rourke, 1961); decision timing and public observability (Carpenter, 2002), and strategic communication (Carpenter, 2010).

We take a different analytical tack. While still exploring the role of OPC in the HSE's reputation management, we replace utility maximization with analysis driven by policy learning. Reputation-sensitive agencies aim to learn how they are perceived out there in society, and use that knowledge to alter their behaviour and sometimes their goals. The relationship between learning—both inside and outside the agency—and reputation is beginning to be examined (most notably by Moffitt, 2010). However, such learning-infused approaches are still out-numbered by rational choice driven analyses.

9.3. Conceptualizing Learning Relationships

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[2] http://www.hse.gov.uk/contact/myth-busting.htm.

The argument pursued here is that agencies develop and adapt organizational capacities that help them engage in productive learning relationships with their various audiences. By viewing OPC creation for reputation management through the analytical lens of policy learning, we treat capacity not simply as an objective good but as held in dynamic relationships between governance actors. Understanding these relationships means understanding how, what, when and why different actors learn and from whom. In this instance, we are interested in the interactions between an agency and citizens. What types of learning are the HSE and members of the public engaged in with the MBCP initiative? And, what types of OPC are generated by it? To link learning to capacity building, we first need to be clear about what we mean by policy learning. We take policy learning to mean the updating of beliefs on the basis on new information and debate. Yet, learning is not monolithic—indeed the social sciences literature reveals a variety of types with different participants. Seeking to systematize these, Dunlop and Radaelli (2013) develop a four-fold typology. Specifically, they propose that four learning types are a product of two conditions associated with regulatory environments.

The first concerns the problem's level of tractability. Where this is low— i.e., the issue is socially contested or technically specialized—regulatory agencies must engage with either society or authoritative experts. Where tractability is high, the challenge is usually one of powering more than puzzling, and the problem dealt with through established groups of stakeholders or formal rules enforced by hierarchies (most commonly courts). The second condition concerns the certification of actors: that is, the extent to which a socially endorsed group exists with whom policymakers should direct their attention. Where no such certified group exists, learning participants with whom agencies must engage will be plural—composed of a range of interested actors or of wider society itself. Taken together, levels of issue tractability and actor certification provide the basic conditions for four types of policy learning that dominate the public policy literature (see Figure 9.1).

These four types have been outlined in more detail in other places (Dunlop & Radaelli, 2013; Dunlop, 2014) and their differences are summarized in Table 9.1. This chapter is interested in how OPC can be generated or inhibited in situations dominated by reflexive learning. Here, low problem tractability combines with a scarcity of socially certified experts, resulting in policy knowledge being created by a potentially infinite range of social actors. As participation increases, different types of knowledge come to the fore and received wisdom is challenged and recreated. The hierarchy of epistemic learning is replaced here by a range of codified and uncodified knowledge types— substantive; value-based; experiential; innuendo and myth (Wegner et al., 1981)
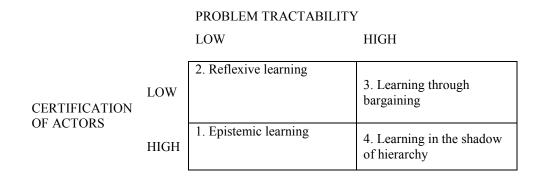
—associated with complexity (Sanderson, 2002).

Public engagement in reflexive learning is unavoidable. Indeed, agencies have long been pushed by elected politicians to open up to public scrutiny. While mechanisms like notice and comment, freedom of information and public advisory committees are monitoring devices for politicians, the public engagement they afford also advance an agency's reputation and boost policy legitimacy (Moffitt, 2010, pp. 880–881). Where successful, public engagement offers a strong defence from political and media attack. Reflexive environments present considerable challenges however. Critically, agencies must decide how much they are willing to learn from and with society; essentially how much political capacity can be generated in these relationships? Do they remain aloof and simply monitor public responses to decisions, or invite full public review? In its ideal form, reflexive learning is in the Habermasian mode where policymakers' attention is diffuse and puzzling is collective. Interactions here are cooperative and symmetric and dialogue force-free so that multiplicity of voices can be heard and preferences open to persuasion.

The specific interest in this chapter is in how reputational management can be achieved or inhibited through reflexive learning. Before exploring what such learning settings imply for OPC, the next section unpacks reflexive learning in more detail.

9.4. Unpacking Reflexive Learning

Using a theory of adult learning that focusses on actors' control over aspects of knowledge production, we expand the property space of each of the four types of learning (Dunlop & Radaelli, 2013). By differentiating between instances when the policymaker in the agency is able to focus on the contents or objectives of the problem at hand (see Dunlop, 2009; Mocker & Spear, 1982), we capture four varieties of reflexive learning in which different types of OPC are generated (see Figure 9.2). By focussing on the extent to which policymakers can exert control over aspects of knowledge production, we can uncover the power dynamics at work in the construction of OPC when engaged in learning relationships with citizens.

Figure 9.1. Varieties of Policy Learning

| | | PROBLEM TRACTABILITY | |
		LOW	HIGH
CERTIFICATION OF ACTORS	LOW	2. Reflexive learning	3. Learning through bargaining
	HIGH	1. Epistemic learning	4. Learning in the shadow of hierarchy

Source: Dunlop and Radaelli (2013), p. 603: Figure 1.

Table 9.1
Differentiating policy learning types.

Learning as . . .	Epistemic	Reflexive	Bargaining	Hierarchical
Knowledge use as . . .	Instrumental	Conceptual	Political/symbolic	Imposed
Causal mechanism . . .	Expert teaching	Deliberation	Resource	Institutional rules
Interaction of policy actors as . . .	Cooperative asymmetric	Cooperative symmetric	Competitive symmetric	Competitive asymmetric
Policy-makers' attention as . . .	Directed	Diffuse/divided	Selective	Routinised
Reputational benefits as . . .	Achieving evidence-based policy gold standard	Facilitating wide ranging debate and social accountability	Securing agreement from powerful stakeholders	Assertion of clear authoritative voice
Policy pathologies as . . .	Groupthink and stifled innovation	Uneven capacity leads to spurious consensus	Regulatory capture	Blocked learning through fear of hierarchy

(overlaid text: knowledge use mediated by . . . competition)

Dunlop (2014)

In reflexive settings, the distribution of power is polyarchic: there must be room for force-free learning and exchange. The major issue for agencies that aim to engage with citizens is how to capture the knowledge that is 'out there' (much of which is non-professional and not codified). The ultimate aim is to develop governance architectures that facilitate the exploitation of innovation (Sabel & Zeitlin, 2008) and make a virtue of the many voices in society.

This aim is embodied in the ideal type of reflexive learning where dialogue is deliberative (bold and underlined in Figure 9.2). Here, learning between agency and society is the outcome of iterative processes of communication, persuasion and invention (Dunlop & Radaelli, 2013). In this most reflexive of spaces, what is learned is open as are the ends to which those

lessons might be put. In this case, what health and safety regulation is and its objectives cannot be pre-set. Rather, they are co-produced in the act of learning. In this context, the first key task for the capacity-building agency is to create a governance architecture to support early and frequent deliberation. Recent work on engagement in the public understanding of science literature is informative. To qualify as a genuinely deliberative process, policymakers must engage publics 'upstream' of the decision-making process (Stirling, 2005) and allow discussion of fundamental substantive and normative questions. Building a consensus around these discussions is the next challenge for the agency. Where successful, such a socially sanctioned paradigm may smooth the agency's path for a long time to come. But, if deliberation is insincere, or participation skewed towards a single viewpoint, the 'wisdom of crowds' (Surowiecki, 2004), learning may degenerate into little more than a spurious consensus generating further instability and reducing political capacity.

Figure 9.2. Expanding Reflexive Learning

		POLICYMAKERS' FOCUS ON LEARNING OBJECTIVES	
		LOW	HIGH
POLICYMAKERS' FOCUS ON LEARNING CONTENT	LOW	Dialogue through DELIBERATION	Dialogue through EXPERIMENTATION
	HIGH	Dialogue through FRAMING	Dialogue through EVOLUTION

Source: Modified from Dunlop & Radaelli (2013), p. 607, Figure 3

Where learning is structured through experimental dialogue, agencies focus on gathering evidence and supporting knowledge creation in society to advance mutual understanding. The task or goal of this exercise is exogenously controlled. So, for regulatory agencies like the HSE, these tasks may be set by political principals or necessitated by high profile campaigns against the agency waged by stakeholders in the media. What matters is that the agency is seen to engage in boosting public awareness and understanding of its work, and is able to adjust its assumptions in the light of citizen feedback. But, there are no guarantees that what will be produced will satisfy the goal that has been set. At its weakest, engagement is a meaning-making exercise on the part of agencies and simply a guise for educating citizens and filling supposed knowledge deficits. In these cases, dialogue can break down, with citizens becoming sceptical of the enterprise. At its strongest, experimental processes involve the co-production of knowledge through trial and error, where Bayesian learning leads to the type of content that best suits the exogenous learning goal.

Where learning takes the form of dialogue framing, policymakers engage in sense-making citizens experiences (Weick, 1995). Again, this is not a full two-way relationship. Since they have no control over the specific content of what is learned, policymakers' learning experience will operate through issue framing in the context of a pre-determined over-arching goal. By relying on citizens for the actual content of what is learned, policymakers risk seeing only what they think is relevant to an objective. Thus, what policymakers learn is contingent on how they frame their objective.

The last type of reflexive learning concerns evolutionary dialogues between agency policymakers and their social audiences. Here, learning takes place in loose issue networks where what is learned is random and participants constantly change. Evolutionary learning cannot be controlled, manipulated or shaped but concerns monitoring what is going on in society. Agency activity here is not to co-produce, educate or select knowledge with and from citizens. Rather, capacity building lies in its ability to listen to the 'static' noise in society. Gathering such intelligence is the stuff of early warning systems and is essential if agencies are to avoid embarrassing gaffs or accusations that they have taken their eye off the ball—it demands organizational patience and memory-making.

9. 5. Busting Myths and Managing Reputations with Four Organizational Political Capacities

The four different reflexive learning challenges outlined can be linked to distinct types of OPC found in public administration and management accounts of institutional learning and capacity building (notably, Bennett & Howlett, 1992; Borrás, 2011; Zahra & George, 2002). These are: absorptive capacity (ACAP); administrative capacity (ADCAP); analytical capacity (ANCAP); and

communicative capacity (COMCAP). These capacity types map onto the four reflexive learning challenges concerning: what the agency learns from society in each; the agency's aim; the functional forms of reflexive learning that strong capacities can support; and, the degenerative forms of learning that may result where capacity is incomplete or weak (summarized in Table 9.2).

What are the merits of linking types of organizational political capacity with types of learning? Earlier, we defined policy learning as the updating of beliefs. This treats learning as an action-oriented, relational activity. Even a decision not to change behaviour or preferences on the basis of updated knowledge represents an active choice being exercised by policymakers. Thus, when we explore capacity through the learning lens, we treat these capacities as dynamic in two ways. OPCs can be changed—as learning circumstances change so too can capacities—and OPCs can, in turn, effect organizational choice and sometimes change.

9. 5.1. Absorptive Capacity (ACAP) through Evolutionary Dialogues

Management researchers use the idea of absorptive capacity (ACAP) to explore a range of knowledge creation and utilisation activities that help firms gain competitive advantage (Cohen & Levinthal, 1989). Empirical studies demonstrate significant relationships between ACAP and innovative outputs (Zahra & George, 2002, p. 185). The ACAP literature is marked by a diversity of definitions; this analysis is interested in the acquisitive type of ACAP which is possible when policymakers and societies engage in learning in the evolutionary mode.

Table 9.2: Organizational Political Capacities and Reflexive Learning

OPC as….	Reflexive learning as . . .	Agency learns about . . .	Agency aim is . . .	Reflexive learning functional as .	Reflexive learning degeneration
Absorptive (ACAP)	Evolutionary	Listening and memory-making	Acquisition of social knowledge	Deciphering, storing and remembering social noise	Society is heard passively and forgotten
Administrative (ADCAP)	Experimental	Meaning-making	Exploitation of social knowledge	Co-producing policy content	Citizens are 'educated' and deficits filled
Analytical (ANCAP)	Framing	Sense-making	Assimilation of social knowledge	Understanding citizens' perspectives to inform policy goals	Politically selective use of social argument

Communicative (COMCAP)	Deliberative	Opening-up	Knowledge transformation	Socially-sanctioned paradigm creation	Spurious consensus

Source: Elaboration of Dunlop (2014).

Here, we are concerned with the value the HSE places on acquiring the knowledge that exists in society. How that knowledge is understood, transformed or exploited is not the issue. In evolutionary learning, agencies are building capacity to listen to what is going on. What matters are the routines and processes in place to gather evidence that allow an organization to respond and, if necessary, to adjust policy.

At a basic level, ACAP requires that the agency understands the need to engage with the external world. The HSE's information-gathering culture is strong, and understanding the world 'out there' is seen as a core part of their business (interviews with press office officials and policy team, October 2013). Its role as a guardian of health and safety legislation in the UK ensures that keeping up to date with how these regulations 'play out' on the ground is critical to the agency's survival and effectiveness. As was intimated earlier, in the last decade the agency has diversified its reconnaissance strategy—moving beyond listening to stakeholders to engaging citizens. The HSE has engaged in occasional surveys of the public—in particular when the 'health and safety gone mad' expression first began to take hold in the early 2000s (Elgood et al., 2004). But, the centrepiece of this listening operation is daily media monitoring.

The agency uses a specialist media monitoring contractor to search the UK national print and broadcast media to record every mention of HSE as an agency, and health and safety as a system or culture. The service flags priority issues, HSE campaigns, board members and linked organizations, and are stories rated on a favourability scale. The monitoring service provides the cuttings or summary of the stories, and colour coded digest each day that allows the HSE to 'take the temperature' of the citizens on health and safety. To give a sense of scale, in 2012/13 and 2013/14 the HSE received 2612 and 1510 stories referring to health and safety as a culture (Dunlop, 2015).

The ability to acquire external knowledge enhances organizations' strategic flexibility and degrees of freedom to adapt to dynamic environments (Zahra & George, 2002), and allows them to direct their focus on the content or objectives of their activities – or both. Success in information acquisition has three key dimensions (Zahra & George, 2002, p. 189). The first two concern intensity and speed; the effort and reaction speed of monitoring beliefs in society that may enhance or challenge an agency's ability to defend its reputation and make effective policies. And so, as efforts increase to detect the social 'static',

the agency's long-range vision is enhanced as potential problems on the horizon come into view early.

Controlling the speed and intensity of knowledge acquisition involves trade-offs, of course. Horizon scanning is an imprecise and costly science. The speed of knowledge acquisition is fundamentally problematic—not least because the timelines for knowledge development in society and polity are very different (Dunlop, 2010). Social beliefs and knowledge often grow slowly and are 'creeping' (Weiss, 1980). As agencies survey the landscape daily, there is the possibility that they will miss the bigger picture forming. These different temporal horizons often lead to policy gaffes—what may seem like an inconsequential speck on the horizon and so ignorable by policymakers, can in the blink of an eye (or the click of a mouse) become an urgent problem. For the HSE, the effort to absorb is considerable and its monitoring strategy gets intelligence to the agency fast. Indeed, the first job of the day in the press office is to analyse the daily briefing document sent overnight on the previous day's news (interview with HSE press office team, October 2014). But, the ability of the organization to remember what it has heard and piece together patterns in the data is less clear.

The third dimension of acquisition is the source of information. Agencies engaged in capacity building must develop their peripheral vision to see what might be coming out of left field, or from unexpected sources. The direction of knowledge accumulation is key; with no locus of control over the content and ends of learning, policymakers must cast their nets widely to capture knowledge which represents the complexity and variation of social views.

For all organizations, the development of peripheral vision is fraught with difficulty. By restricting itself to press and broadcast media, the HSE is missing social media and online worlds—i.e. 'Big Data' (interview with press officer, April 2014). The extent to which citizens' discussions in these fora provide alternative information to the HSE is unclear. But, it would certainly offer an opportunity to make new connections with the public and provide information that is unmediated by the media. Given the inevitable perceptions that particular newspapers and providers evoke, by gathering social media the HSE would be more able to listen without prejudice. Yet, it is still gathering large volumes of information with the knowledge that much of the information gathered may be irrelevant. But we must recall that the purpose of evolutionary learning is to listen—not to use. This is a mapping exercise where success is being aware of and remembering the beliefs about the agency and its work that exist in the external world.

9.5.2. Administrative Capacity (ADCAP) in Experimental Settings

Administrative capacity (ADCAP) involves the ability of an agency to use

its resources and direct its operations to work with governance partners to transform what is known and understood about an issue. Here, learning takes an experimental form, with policymakers finding ways to engage citizens in meaning-making around an issue.

Such experimental dialogues can result in citizens being 'educated' top-down and fed a 'party line' by agencies. Yet at its most functional, experimental learning enables the creation and exploitation of new understandings. Agencies can enhance their existing understandings as they point to evidence offered by citizens in order to meet or even change an exogenously set objective.

When we think about ADCAP in the HSE, we are most basically thinking about the agency's legal freedom to act. This concerns how policymakers' understand their competence in an area. Legal obligations and historic policy legacies will shape the room for manoeuvre and the ability to engage in experimental dialogues with citizens. Where regulations require that agencies engage in public education exercises, such institutional hierarchies can of course work in favour of reflexive learning. Freedom to act also concerns temporal and financial resources. Finding social knowledge which is exploitable may take time—engaging a cross-section of citizens who are willing and able to comment on a policy matter is not a one-shot game. Just how long it takes is, of course, unknown: attracting a critical mass of consultation respondents or submissions to an information campaign is governed more by serendipity than administrative science.

For the HSE, there are few barriers in terms of legal scope. Indeed, a core part of its business is to advise the working public on their occupational rights and on employers' legal obligations. Yet, these are information campaigns that are focussed on highly specific occupation issues—e.g., working at height, occupational stress, or asbestos handling. Exploring and co-producing social knowledge on the pervasive and media-friendly issue of health and safety as a culture is a tougher challenge, and one which the HSE has chosen to take on.

Specifically, the MBCP offers a way for the HSE to speak the language of citizens and the media back to them. By releasing its rulings on the myth cases sent in—through press releases; email bulletins; and, occasionally funny cartoons—the HSE engages citizens in an experimental dialogue about what the erroneous use of the term 'health and safety' looks like. This meaning-making involves using the story submitted to construct the citizen as being tricked out of good customer service or receiving poor communication. The idea of the citizen as having common sense in the face of incompetent employers, retailers or bureaucrats using health and safety is a recurrent theme.

The MBCP is routinely praised by politicians and consumer groups as an example of innovative communication (Löfstedt, 2011; Temple, 2014; Young, 2010), and has attracted interest from other agencies in the UK (and beyond)

interested in developing similar schemes (interview with HSE policy team, August 2013). Yet, the success of this meaning-making is unclear. The methodological challenges in analysing the impact of the political capacity held in the MBCP are considerable: a clear correlation cannot be made between trends of favourable newspaper stories and the existence of the initiative.

And so, the extent to which understandings about health and safety policy and systems are being co-produced is uncertain. The HSE has internalized much of what it has learned from the public to inform information campaigns for more specific issues, but the public's view is unclear (interview with policymaker, January 2014). For example, when citizens read a case of a myth, is it understood as the agency reaching out to them to explore (mis)conceptions, or is it regarded more cynically as a public relations stunt? Do these stories prompt citizens to voice their own stories? While the extent of experimental learning is not clear, the diversity of the MBCP cases and the goal-oriented nature of health and safety make it unlikely that the MBCP could degenerate where citizens are passive recipients from lessons provided from those at the top.

9.5.3. Analytical Capacity (ANCAP) through Dialogue Framing

The previous two capacity types have addressed learning scenarios where agencies have little focus on the objectives of learning: in ACAP the interest is simply to be aware and ADCAP it is to focus on content. But, of course, policymakers also have end goals. There are learning challenges where attention is focussed on meeting a preference by drawing on the understandings of society. Where the agency's ability to meet a priority is framed by social understandings, analytical capacity (ANCAP) is required. Put simply, the agency can only meet its policy goals and protect its reputation if it understands what the public is saying. This is the realm of knowledge assimilation and sense-making.

Like most regulatory agencies, the HSE uses consultations to call for stakeholders views on specific issues. These are usually highly technical dialogues and rarely involve citizen respondents. While the public voice is in some way represented by the information gleaned from the media monitoring, the MBCP scheme is designed to directly elicit views from ordinary members of the public. Unlike most consultations, which are necessarily framed by an agency's goal, the data collected by the MBCP are driven by the public. The online form for the reporting of suspected health and safety myths is open. Citizens can insert as much or as little information as they want. In some cases, the HSE will contact the author to ask for clarification or a specific piece of information. But, critically, it is expressed in the citizen's words—reducing the likelihood of co-option.

The HSE makes sense of the case by referring it to sector specialists in the agency who assess the possible risks involved and any legislation that may be

applicable. The case is then sent to the panel who decide whether it is a myth or a sensible decision. In 2012/13, seven of the 194 cases taken forward to the panel were deemed to be 'sensible' (Dunlop, 2015). The rest were put into one of four myth categories: over-interpretation of health and safety legislation; communication problem; excuse for poor customer service; or, the domain of a different regulator.

This process of categorization facilitates the interpretation and comprehension that allows HSE professionals to think outside their own box. The MBCP affords the agency a window on the everyday world where the use of health and safety is underpinned by heuristics that may differ radically from those found in the HSE. Yet, there is a problem of selection bias. The MBCP is a supply-driven exercise –the HSE can only analyse the cases that are submitted. And so, it is impossible to estimate the representativeness of the cases they consider.

What of this sense-making? In its perfect form, what is learned by these social frames may be used to adapt policy goals and (re)orient them towards society. But, the fundamental challenge for the HSE is that it enforces legislation made elsewhere, legislation which is goal-oriented and not prescriptive. Rather, the promise of the MBCP is to assist the HSE in understanding the popular image of health and safety which can inform the language or methods it uses to manage policy delivery and enforcement. This hard constraint makes full exploitation of this analytical capacity unlikely. It also makes it unlikely that MBCP would be used by the HSE in an overtly political way.

9.5.4. Communicative Capacity (COMCAP) in Deliberative Settings

When they deliberate with the public, agencies focus on both the ends and means of policy—i.e. what should be done and what knowledge is relevant to doing so. In short, they aim to develop communicative capacity (COMCAP). COMCAP concerns the extent to which the agency is willing and able to open up the goals and understandings of policy and engage in public critique of them. The aim here is to transform knowledge about the matter at hand to enable agencies to refine their own understandings as new social knowledge is grafted onto or replaces agency thinking, or old interpretations are reconsidered in light of wider social debate.

Transformative results rely on synergy, recodification and bi-sociation in knowledge production (Zahra & George, 2002, p. 190). Most commonly, synergies are created with citizens using deliberative techniques such as consensus conferences. By giving a cross-section of social actors the space to question policymakers, agencies and the public can exchange their views and perceptions about an issue of concern. For the transformative potential of these

exercises to be realized, however, government actors must be willing to either adjust their own understandings—recodify—or, more radically, to combine their own views with those of society to create an entirely different policy paradigm.

For the HSE, COMCAP is low. Given the agency's inability to change legislation the lack of engagement in deliberation with society is understandable. But, it is also a conscious move and indicative of the agency's wider political vulnerability. Opening systems up to deliberation can be highly risky. In the absence of a willingness or ability to change, engagement strategies become little more than cosmetic exercises which citizens easily see through (see for example 'GM Nation' in the UK [Rowe et al., 2005]). The risks here are considerable; trust in risk management systems is asymmetrical—it is easier to destroy than to create (Poortinga & Pidgeon, 2004).

9.6. Conclusions

This chapter elaborates an analytical framework that explores reputation management by linking policy learning and OPC. It has used this to explore a 'live' empirical challenge being tackled by a UK regulator. The HSE's myth-busting initiative reveals considerable reflexive learning and relationship building in three of the four modes. The agency is developing antenna to absorb what is going on in society (ACAP); using the cases as communicative tools to engage in meaning-making (ADCAP); and developing an appreciation of citizens' heuristics on health and safety by making sense of the cases submitted (ANCAP). The absence of deliberative learning highlights that some capacities—in this instance COMCAP—may be left uncultivated because the gains are marginal, or the risks of creating countervailing pressures too high.

By connecting the learning and governance literatures, the framework demonstrates that in regulatory settings characterized by multiple actors and implementation uncertainty, OPC takes many forms and has many outcomes. This emphasis on equifinality matches the idiosyncratic, multi-dimensional and socially constructed nature of all types of organizational capacity. Applying the learning framework to the other eight parts of the Wu et al.'s (2015) capacity matrix may help uncover the multiplicity of different skills that create value. What it also reveals is that while there will be some common mechanisms developed by government agencies to strengthen their ability to learn from and with society, the ways in which different types of capacity develop and the ultimate blend that exists at any one time are highly contingent on the policy challenge at hand.

Future research could usefully explore how capacity building can be re-designed. By identifying the two central dimensions of learning, the framework reveals what is required for learning to succeed. Where learning is incomplete

and OPCs' strategies do not match the reality of the context, the model can be used to generate alternative or corrective public engagement strategies.

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