

PUBLIC POLICY DIALOGUE & ADVOCACY

PREPARING POLICY POSITIONS

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PREPARING POLICY POSITIONS

1. Introduction

This handbook is about writing policy positions and assumes that you have already done the necessary research and have worked with board, members and other stakeholders to formulate a position. This will be an iterative process in which you start with an analysis from your research. Then staff or a working group draft a position. This is then tested and refined through consultation – perhaps through surveys, meetings, workshops – with your members. It is important that the final position is shared by the vast majority of your members since otherwise they will undermine you when you start to advocate the position to government.

Research gives the foundation for action, but it does not dictate the direction of action. That requires that you formulate and adopt a policy position. Influencing policy makers requires that you are able to make a compelling case. This may not always be done through written documents, but writing a document will help you to think about the messages and the logic – and the interests you share with the government – even if you only then use it to refine a spoken argument.

The five-step approach to advocacy suggests a separation between research and preparation of a policy proposal. These are not necessarily separate processes, but they do have different requirements.

Policy papers will allow you to pick out key points from your research and assemble them to reflect the perspectives of those you are seeking to influence. Writing a position paper will help you to think about the messages and the logic before you meet policy makers and will also give you a written summary to support personal presentations. You can also use it to keep your members informed.

The primary audience for your policy position is public sector policy makers – who will likely comprise Cabinet Secretaries and Ministers, influential Parliamentarians (such as Chairmen of select committees) and senior civil servants. Other stakeholders, including other business associations, the media, NGOs, the general public etc, may well be interested, may support your position, and may ally with you to seek change, but your specific objective is to influence policy makers.

By the end of this handbook, you will:

- Be able to marshal arguments in support of a stated position
- Understand how to write logically and effectively to communicate a compelling policy position.

2. The purpose

In practice, policy position papers need to achieve two objectives:

- To communicate, clearly and concisely, the position taken by your organisation in relation to a specified policy area, which could be quite narrow or fairly broad, and your recommendations for action;
- To influence policy makers, ideally so that they act in accordance with your wishes, but otherwise so that they adopt a position that is close to yours (or closer than it might have been had you not attempted to influence them).

Policy position papers are not the only means of communication or influencing, but often they will be the only written explanation of your position. You may choose to articulate your policy proposals in a research report, but it is then more than just a research report. Whilst your research may imply policy proposals, it is good practice to keep them separate, not least because you may wish to share the research with a range of stakeholders, before you have an agreed policy position. A policy position paper prepared by a business association will need therefore:

- **To describe and frame an issue or problem** faced by public policy makers and, if appropriate, the implications for business and other stakeholders.
- **To explain the current policy** of the government (which will require an understanding of the policy imperative).
- **To describe the possible options** for addressing the issue.
- **To recommend a public policy approach** which will minimise the impact on business and to support the recommendation(s) with succinct **justification**.

To be effective, you need to summarise your policy proposal and the argument needs to be clear, succinct and persuasive.

3. Preparing policy position

A policy position should summarise the proposals you wish to advocate. It should be based on the research you have undertaken and the consultations you have had with your members and other stakeholders and which provides the supporting, detailed evidence for your arguments. Your policy position is likely to be formed through careful consideration of:

- Your original ideas on the issue
- The results of your research
- The views of public sector contacts and policy makers
- The views of members

Your policy position needs to be clear and actionable, but also owned by those who might be involved in its implementation. One good approach is to form a task group or working group to draft an outline policy position, ideally with the involvement of public sector stakeholders. Their conclusions can then be circulated to members, comments and feedback can be invited, and discussions and workshops can be held. Once views have been solicited, and perhaps additional evidence and stories gathered, the policy position can be refined and

adopted. It is important that, as far as possible, your members share and support your policy positions since otherwise there is a danger that they will undermine you when you start lobbying government.

Your position will depend on the point at which the policy has reached in the policy formulation process. If a public policy already exists, and you want to change it, then you will need to look at the policy, and its impact, in detail. If it is a proposal for a new public policy, in the form of a 'white paper' for instance, then you have something concrete about which you can argue. But if the proposal is at a very early stage, perhaps the setting up of a committee to look at an issue, then you may want to attempt to influence the scope of the review, in an effort to lessen the potential impact.

Business associations often start by believing that they have to oppose the policy proposal being developed or discussed by the public sector. Understanding the policy imperative will help you to develop your own policy position and careful framing – looking at it from a different perspective – may help you to do this.

You may conclude that you can live with a policy imperative provided it is amended at least to some extent to address your concerns – or you may decide that the most effective approach is to focus on the administrative arrangements for implementation rather than on the policy specifically.

Be realistic about how much you may be able to achieve. If Ministers are determined to press on with a policy, you are unlikely to change their minds. Instead, focus on minimising the implementation burden. Influencing is, above all else, an art of achieving the maximum possible.

4. Writing the paper

Here are some ways you can ensure the quality of the final policy position paper:

Examples

You can find examples of policy positions on the BAF website.

The Architectural Association of Kenya has published a policy paper on 'Managing Building Development' available at baf.fyi/pppAAK01. This describes AAK's position in relation to what is known as development control.

An alliance of Kenya Alliance of Residence Associations, Kenya Chamber of Commerce & Industry and Rural Business Community adopted a policy position in relation to Nairobi City Council's Waste Management Bill 2014. See baf.fyi/pppKARA01.

The Agriculture Industry Network brings together more than 35 business member organisations representing different aspects of agriculture. They published a position paper on agricultural policy reform focusing on the AFFA Act of 2013. See baf.fyi/pppAIN01.

Whilst written as more of a white paper than a policy position, the African Cotton & Textile Industries' Federation, has a policy position on the US African Growth & Opportunity Act. See baf.fyi/pppACTIF01.

These will give you ideas about layout and content. Do not aim simply to replicate them; rather, aim to do better than them! Templates can be provided if that would be helpful.

- **Be clear about the purpose of the paper.** Keep it focused. Keep it simple. Think clearly what message you want to communicate – and do so succinctly.
- **Keep the main report short.** The ideal is no more than four A4 pages, which can then be printed as a single, folded A3 sheet. If there is a need to provide detailed evidence, then use appendices, or refer to a separate research report that should also be available to interested stakeholders.
- **Ensure that you take the reader logically through the argument** and ensure that the conclusions flow logically from the evidence. Use new paragraphs for each new idea or proposal.
- **The research to which you refer in your paper needs to be thorough and rigorous** so that your policy proposals flow logically from the evidence.
- **Have a mix of types of evidence.** Include precise statistics showing the individual or global impact, but also include case studies or stories to personalise the impact. If you quote from other reports, remember to cite your sources fully and accurately.
- **Do not rush it.** Ask colleagues and members to read drafts. Check spelling and grammar. Check that everything makes sense. Check that your conclusions follow from the evidence.

4.1 The content

The following checklist will help you to think about the structure and the content of your policy position paper

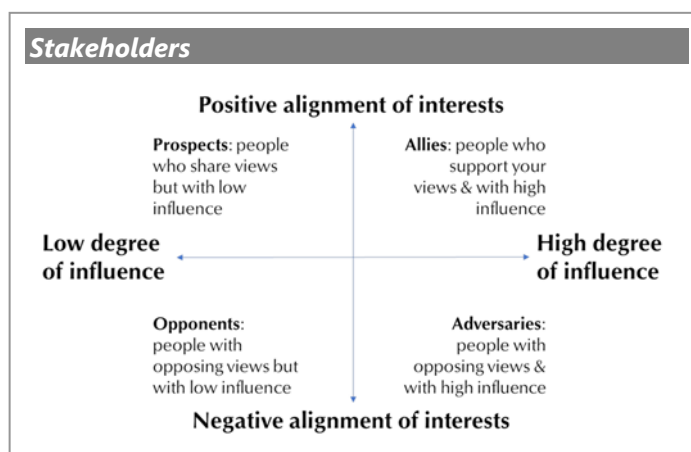
- **Title:** a good title will immediately grab the reader’s attention, so think about it carefully.
- **Summary.** Start with an opening paragraph which goes straight to the point, summarising the issue and summarising the recommendation(s) – like a good press release, you should aim to grab the reader’s attention straight away and encourage them to want to read on.
- **The issue:**
 - **Statement of the issue.** Explain the issue, using relevant data and statistics, which should be complete and accurate, including financial, environmental, cultural and political aspects and consider whether the ‘correct’ issue is being addressed. Careful framing of the problem will, to some extent, define the terms of the debate and suggest a solution.
 - **History.** If there is a public policy already in place, explain the policy and what the government was trying to do and why it now wants to do more, or why you now want it to do less.

Framing

If you have not already clearly framed the issue, now would be a good time to do so. If you can frame the issue as administrative change or reinterpretation of existing policy, you will find that is simpler than asking the government to revise policy or to legislate.

Think about the simplest way to frame your issue. For example, consider the issues of the country assembly member advocating that retailers give free biodegradable bags following the government’s ban on plastic bags. Is this an issue of environmental protection? Or is it an issue of a policy makers interfering in the way that businesses manage themselves?

- **Stakeholders.** Identify and state all the stakeholders with an interest in the issue and note why they are interested. This is especially helpful for issues which are salient or likely to be contested.



- **International comparison.** This will not always be necessary, but there may be occasions when it is worth looking at the approach taken by other countries to the same issue.

- **Impact.** Describe the (potential) impact of current (or proposed) public policy; consider the consequence of the government doing nothing and why there is a need to address the issue now.

- **Policy options:**

- **List the possible options**, including the 'do nothing' option, to address the issue. Sometimes it can help to include the options in the paper not least because you can lead the reader through to the one that you really want to be adopted. You may conclude however that it is more sensible only to describe your favour option in case you inadvertently encourage the policy maker to pick the 'wrong' option.
- **Consider each option**, (or explain why some options have been omitted) in terms of costs and benefits for business, government and other stakeholders, and set out implications for business.
- If there are **constraints** on the choice of option, including political constraints, these should be explained.

- **Conclusions and recommendations:**

- **Conclusions** should follow clearly from the discussion about the issue and should be rooted in the evidence.
- **Policy recommendation(s)** should state what should be done and by whom.
- **Justification.** Make the case in support of your recommendation(s) including financial, technical and political aspects (see below). Sometimes emotional arguments (such as fairness) can be powerful arguments, though usually in support rather than on their own; you need to make the case for your chosen option being the best option for all concerned

- **Implementation.** It is not normally necessary to make proposals for implementation, but there may be some instances where it is necessary to provide a plan or a timescale or to identify the responsible people.

- **Monitoring and evaluation.** You may want to make suggestions for particular activities to be undertaken by the government to monitor

implementation, to monitor and evaluate the impact of the policy and to review the policy in due course.

- **Appendices.** You should include a bibliography (if you haven't included citations as footnotes) and may wish to include (some) supporting evidence, or else, you may simply cite your own, more detailed, research report(s).
- **The author:** it will almost certainly help to set out your credentials, but do not allow that to interfere with your argument. Instead say briefly, in a sidebar perhaps on the front page, who you are.

4.2 The justification

A justification, or an argument, makes the case in support of your position and recommendations. Argument can use both narrative and quantitative information.

In his book, "The Secret Language of Leadership", Stephen Denning describes the 'old' approach of defining a problem, analysing a problem and recommending a solution. He suggests that, since different people may draw different conclusions from the same facts, there is merit in using a different approach, based on narrative. He suggests the use of a different three steps:

- grab attention, through the use of 'negative' stories;
- stimulate a desire for a different future, through the use of 'positive' stories designed to achieve action;
- reinforce with reasons, perhaps neutral stories, explaining what, when, how and why.

Quantitative analysis can add facts, figures and statistics, derived from your research perhaps about the number of businesses affected and the way in which they are affected, to reinforce the argument.

Argument does not prove or disprove – though the evidence may. Argument is not a quarrel between proponents and opponents. Argument should identify areas where there is agreement – and those areas where this is disagreement. The areas of agreement may provide scope for forming coalitions or alliances. But they may also indicate the scope for negotiation and compromise, which can satisfy all parties. Focusing on the disagreements may provide insights into the reasons for the disagreement and may also assist in delineating the constraints.

Demonstrating an understanding of the positions taken by other stakeholders, and being willing to adopt elements that are acceptable, may assist in encouraging others to take seriously the position that you are espousing.

In advocacy, at least, argument provides reasons and leads those whom you wish to influence through the steps which inevitably lead to acceptance of your recommendations.

Most arguments will be explicit – but the fact that the government wants to do something is to argue implicitly that they believe that they have a role in the issue – and you may want to question that.

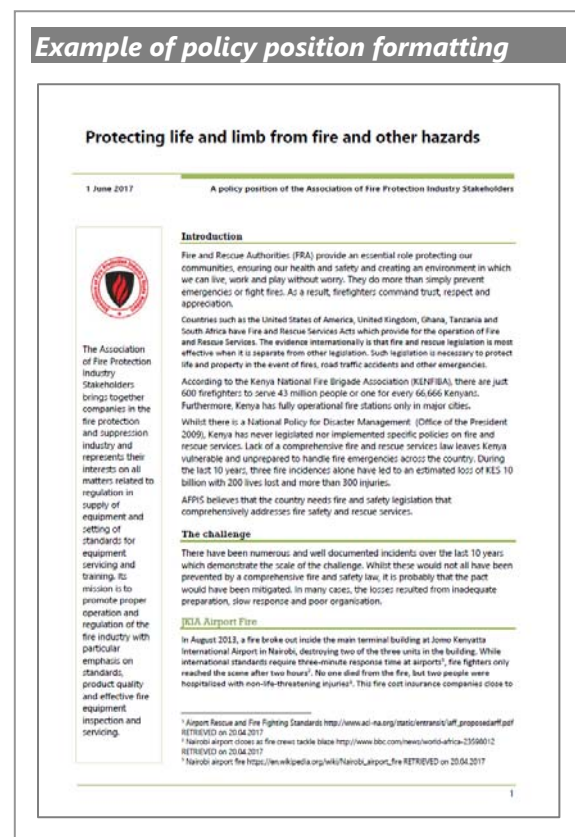
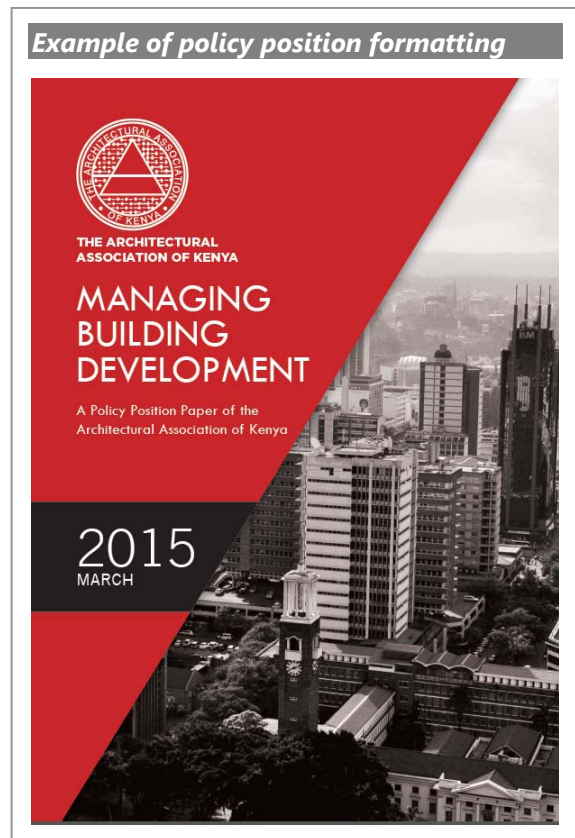
The argument needs to present facts, assumptions and interpretations from which the recommendations follow. Do not assume that the reader will understand or accept your argument – spell it out clearly.

Be clear about the problems that are addressed by your solution(s).

4.3 The presentation

Ensure that the report looks good.

- Think about the formatting. If you are publishing a number of documents, then think about adopting a “house” style which makes it easy for the reader to find their way around the document.
- If you want to include information about your organisation, put it in a side box, so as not to detract from the key messages.
- Most people find it easier to assimilate data if it is presented graphically rather than in a table. If you use Excel to prepare charts, then develop your own style; be consistent in the use of charts and graphs.
- If you quote figures, then do not imply greater accuracy than actually exists; avoid decimals, and round up (to tens, or hundreds, or even thousands) as appropriate.
- Proof read carefully; check that the paper has no spelling mistakes.



4.4 Oral presentation

If you will be making oral presentations of your position, think about how you will do that. You need to be as succinct and persuasive as in your written document.

Prepare well. Try not to use notes or, if you need a prompt, keep them short rather than reading a speech. Stand up – so that you can breathe fully and deeply which will mean that you project your voice better.

Many people use Power Point. If you do so, follow these simple rules:

- The slides are supposed to summarise the message that you wish to convey, not to replace you, and don't just read the slides
- Design a simple house style and stick to it
- It is easy to write too much on a slide – keep them short
- Use lower case – it is easier to read
- Take care with your choice of font and colour
- Use graphics and pictures where they add value
- Spelling and grammar are important

Writing your slides is only half the communications battle. So, irrespective of whether you use aids, it is important to engage with the audience and seek feedback.

5. Conclusion

Writing a position paper may help you to organise your thoughts and secure agreement from your membership. A well written position paper will be clear, succinct and persuasive. It does not substitute for oral presentation, but does provide a written summary of your position that policy makers can consult if necessary, and can also provide the core of a good speech or other presentation. It may also provide policy makers with material that they can incorporate directly into their own working papers or policy papers.

Further reading and further information



- Stephen Denning (2007), *The Secret Language of Leadership*, Jossey-Bass
- See businessadvocacy.net for links to websites and exemplars of policy position papers.
- Look for guides on effective writing and public speaking – and practice both

This series of advocacy competence handbooks – divided into modules and units – is intended to support business membership organisations (BMOs) to engage in public private dialogue and to advocate improvements to the business environment. You are free to use the units and other materials provided that the source is acknowledged. The handbooks are all available at businessadvocacy.net.

Module 2: Policy positions

2.2 Preparing policy positions

This handbook introduces a host of tips and techniques to help you prepare logical, succinct and compelling policy positions.

Summarising your policy into a paper enables easy sharing with stakeholders and policy makers.

The Business Advocacy Network is an Initiative of Irwin Grayson Associates and can be found at businessadvocacy.net. IGA can be found at irwingrayson.com and contacted at david@irwin.org. You can follow David Irwin on twitter at [@drdauidirwin](https://twitter.com/drdauidirwin).

