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Studying Implementation Beyond Deficit Analysis:

Reconsidering the Top-Down View

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Studying Implementation Beyond Deficit Analysis: Reconsidering the Top-Down View

Abstract

Contemporary researchers of policy implementation make a plea for explaining variation in policy outputs. At the same time still much implementation research, dispersed across the social sciences, entails studies of single cases in which a perceived gap between the intentions and the results of a public policy is analyzed. In this article a case is made for the lasting relevance of studying single policy processes, seen 'from the top', provided that the multi-dimensional character of these processes is taken into account. Empirical material from a study of educational inclusion policy in the United Kingdom shows how public policies may refer to different values (normative dimension), imply ongoing policy formation between a variety of actors, each with particular stakes (political dimension), while policy goals seldom speak for themselves (practical dimension). By consequence, in implementation research the issues of, respectively, what needs explanation (the *explanandum*), locus specification, and the appropriate unit of observation and analysis need attention.

Key words   public policy, policy process, implementation studies, top-down view, top-down versus bottom-up controversy

Introduction

This article is about how to deal with explanatory problems in implementation research when comparative quantitative approaches are impossible. In such contexts there is a need to address the fact that most policies have more than a simple, technical, nature. The objective is, first, to identify a few key dimensions within the multiplicity of aspects of a public policy as such. This helps, secondly, the development of satisfactory approaches when researching the implementation part of a public policy process. The central question is: How can the implementation of a single public policy 'top-down' be analyzed without a priori adopting the discourse of 'success' and 'failure' often accompanying such research? In the next section the standard 'top-down' view on implementation is scrutinized while some fundamental assumptions and suppositions underlying this view are made explicit. In the third section the argument is developed through the use of a specific policy case: inclusive education in the UK. In the fourth section the implications for further research of the findings from this case study are discussed. The article is finished with some conclusions (fifth section).

Looking from the Top

The Original Debate

In the preface to the first edition of their book Pressman and Wildavsky (1973) observe that 'policies normally contain both goals and the means for achieving them' (reprinted in the third edition, 1984: xxi). Their observation is preceded by the remark: 'A verb like "implement" must have an object like "policy"'. In the third edition Wildavsky found it necessary to defend these propositions in an additional chapter written with a new collaborator, Majone. It is called significantly 'Implementation as Evolution'. There they quote a remark by Bardach that 'An authoritatively adopted policy is "only a collection of words" prior to implementation' and his suggestion that a policy is at most 'a point of departure for bargaining among implementers' (*ibid.:* 166).

In Pressman and Wildavsky's original approach a fundamental conceptualization of policy implementation is put forward. First, there is the goal/means relationship as defining a public policy; second, the stress on the character of implementation as a subsequent 'stage', and, third, the fact that 'implementing' entails an act performed by human beings. This founding view on policy implementation is proverbially summarized in the subtitle highlighting the frustration of Washington officials about the realization of their aspirations in Oakland. The subtitle can be seen as the prototypical expression of an 'implementation deficit'. This conceptualization has been characterized as the 'thesis of incongruent implementation' (Hupe, 2011). It had a paradigmatic impact on the kind of implementation research that

would follow (Hill and Hupe, 2014).

After Pressman and Wildavsky's fundamental 'top-down' conceptualization (1973) authors like Hjern and Porter (1981) and Barrett and Fudge (1981) went on to pose a distinct bottom-up challenge. Subsequent writers have sought a middle ground between these positions (Goggin *et al.*, 1990). Winter (2006) identifies problems with the common use of 'goal achievement' or 'policy outcome' as the dependent variable in implementation research. Instead he argues:

> (…) I suggest that we look for behavioural *output* variables to characterize the *performance* of implementers (…). The first aim of implementation research then should be to explain variation in such performance (*ibid.*: 158).

Winter's plea to look primarily at variation in outputs raises the question whether the difference between output and outcome 'simply' concerns a methodological choice, with the issue of the appropriateness of the outcome variable left as one about which we may differ according to our values. It may be, however, that questions about how the multi-dimensional character of policies is interpreted belong within the scope of an implementation study, and need to be taken into account in the formulation of any dependent variable.

Some writers on implementation offer 'Avoid complexity' as a message to policy makers (see for example, Hogwood and Gunn, 1984). In respect of such recommendations Matland (1995: 159) argues

> (I)t is unclear whether policy ambiguity can be manipulated easily when designing policy. At times, ambiguity more appropriately is seen as a fixed parameter.

As Matland suggests, ambiguity may be inherent to a policy. Thus it brings about a situation in which implementers have to adopt practices to resolve this ambiguity, producing variation from place to place or indeed from situation to situation. Implicit in Matland's notion of 'experimental implementation' is that learning in practice may solve this problem, at least if there is political consensus. Matland does not leave the issue there. In his two-dimensional analysis he explores interactions between 'ambiguity', on the one hand, and 'conflict' on the other. It leads him to contrast the relatively uncontested ambiguity of 'experimental implementation' with what he calls 'symbolic implementation' where ambiguity and conflict coincide. Regarding the implementation of such policies, Matland argues:

> Actors are intensely involved, and disagreements are resolved through coercion or bargaining: problem-solving or persuasion are used to a limited degree only. Any actor's influence is tied to the strength of the coalition of which she is a part. (...)

Identifying the competing factions at the local level, along with the micro-level contextual factors that affect the strengths of the competing factions, is central to accurate explanations

of policy outcomes (*ibid.:* 169-170).

Different Values, Varying Stakes and the Need for Interpretation

Several years after O'Toole (1986) formulated the conventional wisdom underlying the top-down view on implementation, this view remains forcefully present – in the practice of public administration, but in implementation studies as well. The following axiomatic assumptions can still be identified:

a) The policy is coherent. Policy goals are expressions of well-related ambitions.

b) Once the policy in the stage of policy formation has been formulated and decided upon, the rest is implementation. Formal authority has been decisively attributed.

c) The policy as formulated speaks for itself. Because policy goals have been clearly defined, implementation consists of applying the required skills.

Underlying the top-down view on implementation these assumptions imply research suppositions like the following:

Ad a) Analysis can be based on given criteria for 'success' and 'failure'.

Ad b) Policy implementation follows policy formation. The relationships between the actors involved in the policy process have, in last instance, a hierarchical nature. In any case within public administration, particularly the system of inter-governmental relationships, there is a principal/agent configuration. Therefore the activities on a 'lower' layer to be analyzed are different from those on a 'higher' one.

Ad c) Implementation is a technical matter. The policy goals can be read as clear instructions for how-to-act accordingly.

The axiomatic assumptions and related research suppositions underlying the top-down view on implementation leads to a conception of research that claims that implementation research is about falsifying, or in any case testing, the 'thesis of incongruent implementation' mentioned above. The essence of this thesis, addressed here as claim I, is that inputs predict outputs. Policy intentions and policy result are supposed to relate to each other in a one-to-one relationship. As a challenge to the original top-down approach an alternative conception of implementation research then claims that it should instead be about explaining empirical variation in outputs. In this claim II some sort of expectations may be formulated, in which variations are deemed better or worse.

There is an important issue here about the distinction between implementation studies and

evaluation. Modern approaches to the latter recognize multiple stakeholders (for example Pawson and Tilley, 1997) or alternative ways of judging policy success (McConnell, 2010) as implying a variety of, possibly conflicting, criteria for evaluation. Of course the scholarly study of implementation is important for and closely related to evaluation - as many have stressed. However, there is a fundamental difference. While the essence of evaluation is making value judgements ('what *should* have happened'), implementation research can be said to be concerned with explaining 'what happened'.

The more radical bottom-up perspective tends to involve a total rejection of any 'top-down' orientation in implementation research; claim II. This is because of the seemingly inherent identification of the efforts to explain a dependent variable with the use of policy goal statements; claim I. Our view is that a total rejection of the basic explanatory question about 'what happens' posed by Pressman and Wildavsky is not needed. Rejecting both claims in their ultimate consequences, we see, instead, possibilities for a systematic approach looking from 'the top' but without explicit goal identification. Winter's advice to use outputs rather than goal achievement as dependent variables is important for the objective of keeping implementation studies within the mainstream of positivist empirical research - concerned with the relationship between a dependent variable (or variables) and selected independent variables. However, in many situations of policy complexity singling out an output may still lead to an unduly simplified view of what implementation involves. This may be illustrated from Winter's work with May on Danish employment policy. May and Winter (2007: 466) compare implementation by different agencies and identify that where local government managed agencies are involved, signals from municipal politicians who 'differ with the national policy of getting people into work quickly' will have an impact upon implementation. Success with an output goal like insertion into employment or training begs outcome questions about the desirability of this for the long run welfare of those so placed, a standard bone of contention about employment policy.

Furthermore, Elmore's (1980) notion of 'backward mapping' – seeing a new 'policy' as entering a crowded space – is pertinent. This concerns not just a matter of the new as an annoying interference with existing practice – values may substantively differ in their consequences. It means that policy making actually goes on after the policy has been formulated and decided upon. While actors involved may stress different values, their interests will vary as well. As Matland (1995) and Brodkin (2007) indicate policy goals are often fundamentally ambiguous, enhancing the ongoing struggle between parties involved in a policy process.

Amending both claims I and II mentioned above we argue that it is possible as well as useful to analyze the implementation part of policy processes without inherently abandoning a top-down perspective. Instead, it seems feasible to acknowledge the multi-dimensional character of public policy, addressing it in a qualitative systematic analysis, while avoiding evaluative and therefore premature qualifications in terms of 'success' or 'failure'. This concern about

understanding the multi-dimensional character of public policy ends up with the identification of three issues that in our view are central to implementation studies. First, there is the question referring to the *normative dimension* of what is expressed as collective ambitions: Which values is a public policy embodying? Examining implementation must involve something more subtle than asking 'Do practitioners do what is required in this new policy?' Second, there is the question regarding the *political dimension* of interests and power configurations: Which stakes are present and which ones are prevailing? A public policy expresses a particular degree of consensus or conflict between stakeholders, both in vertical and horizontal relationships. Third, there is the question focusing on the *practical dimension*: Which action actually takes place? Any public policy poses questions about its interpretation relevant to understanding of what has to be implemented. It seems sensible to recognise that what is being required may imply changes to standard procedures, in situations in which there is structural uncertainty about what constitutes best practice.

As Brodkin (2007: 2) puts it:

> Often, the social policy goals to which bureaucracies are presumably directed are ambiguous and uncertain. (…) When contentious social welfare questions are at stake, this aspect can produce policies that contain multiple and conflicting goals or grand statements of purpose that are not well supported with either resources or authority. (...) In effect, that shifts policymaking from an overt politics of the legislative process to an indirect politics of administrative practice. (...) In those circumstances, lower-level bureaucrats may be tacitly delegated the fundamental political tasks of selecting which goals to pursue and of balancing policy's grand rhetorical ambitions against the practicalities of the possible.

We will explore these issues through the examination of one particular policy, the promotion of inclusive education in the United Kingdom. This illustrates how the multi-dimensional character of a policy has an impact throughout the policy process, and leads on to the delineation of some strategies that may be used in studies of policy implementation.

The Case of Inclusive Education Policy in the UK

Methodology

In the United Kingdom inclusive education has been known as the policy on special educational needs, abbreviated as SEN. The Warnock Report (1978) was an important landmark in the development of such policies in the United Kingdom. The report's recommendations established the principle of integration of children with special needs in mainstream schools. The legislative response to these recommendations, the Education Act of

1981, required over a million and a half children with special educational needs to have equal access to mainstream schools regardless of their (dis)abilities.

The study of the implementation of this policy involved an analysis of national government documents, specialist journals and press reports, local authority committee papers and reports, and interviews of central government officials. A postal questionnaire was sent to all 150 local education authorities in England (abbreviated as LEAs) and received an 87 per cent response. Then there was case study work in eight London boroughs, chosen to provide a contrasting cross section. These involved in-depth interviews with officials, teachers, head teachers, and representatives of local voluntary organizations and of parents as service users. The same information was also sought from interviews with DfES officials and representatives of national voluntary organisations. In-depth interviews were carried out with 24 LEA officers and a total of 32 head teachers, teachers and Special Educational Needs Co-ordinators; 17 national and local voluntary organisations' representatives or parents were also interviewed. Each interview lasted for about an hour and was tape-recorded for later transcription.

Multiple Values

The complexity of the notion of placement in mainstream schools lies at the heart of any judgement about 'success' or 'failure' of the implementation of this policy. Children with SEN can be placed in mainstream schools only if certain important provisos can be met: that such placements are appropriate to their specialist needs, and are compatible both with the efficient use of resources and the efficient education of other children in the school. There are obvious conflicts embedded in that statement, implying differing views on what its implementation must involve.

Local educational authorities have to issue a 'statement' for a child identified as having SEN, specifying those that *cannot be met by the general specialist provision available in a school.* Such a 'statement' not only specifies the specific needs of that child but also indicates the funds that need to be made available to do so. We thus refer in various places below to the statementing process and to complications related to decisions about where this is or is not appropriate. The key complication here, to which we will return, is that only a minority of children with special needs are explicitly the subjects of statements.

Early studies of the implementation of the Act alleged that the circularity and vagueness of the legal definition of 'special educational needs' was largely responsible for a wide variation in interpretations and practices in the local educational authorities, and that integration depended upon the 'willingness' of those authorities to provide extra resources to mainstream schools (Goacher *et al*., 1988; Wedell, 1990). These problems were mirrored in later studies that highlighted similar issues of vagueness and ambiguity with the definition of 'inclusion' resulting in the calls for a review of the system (Warnock, 2005). The resource limitations

'compromised' the decisions and the advice of professionals in diagnosing children with special educational needs. This resulted in local educational authorities making assessments that were beyond its remit and so generalised that they did not commit the local educational authorities to any particular resource use (Goacher *et al*., 1988). Further legislation in 1988 failed to address these anomalies, as it kept intact the basic procedural flaw generated by the lack of clarity about the respective roles of schools and local educational authorities (Wedell, 1990) and pursued with the National Curriculum agenda, despite all warnings. After a decade of implementation, the Audit Commission (2002) requested a full review of the policy *Statutory Assessment and Statements of Special Educational Needs (SEN): In Need of Review?* in June 2002, because the statementing process had become too bureaucratic and resulted in inequitable distribution of resources.

Parallel policy initiatives, aiming to raise educational standards nationally, triggered serious concerns with regard to the agenda of inclusion (by this time, the term 'special educational needs' was replaced with 'inclusive education' in the policy discourse). Raising standards emphasized better school performance and encouraged competition between schools. Evidence suggested that imposing a system of performance indicators upon the educational achievements of children in a 'market-led' school system seriously threatened the successes of inclusion of children with special educational needs in the mainstream environment (Evans and Lunt, 1994). Later attempts to improve the tension between conflicting education policies resulted in the release of additional resources and amending legislation. However, these measures did little to achieve the much desired political consensus.

When the newly elected Labour government published a Green Paper *Excellence for all Children: Meeting Special Educational Needs* in October 1997, it sought to remove barriers that inhibited the retention of pupils with SEN in mainstream schools (see Riddell, 2000). In a target-oriented environment, one of the objectives was to increase the number of mainstream schools that could accept and retain children with SEN from a wide range of abilities (DfEE, 1997). However, it appeared that by 1999-2000 the change process had more or less stopped, with the proportion of children in special schools at around 1%, the proportion of children with special educational needs at around 18%, and the proportion of children with statements of special educational needs at around 3%.

It would be wrong to see this apparent 'deficit' as necessarily a failure to accept the notion of inclusion. Rather inclusion in *society* and inclusion in the regular education system is seen by many as not the same thing. While some definitions of inclusion focus on an institutional perspective involving organisational arrangements and school improvements (Rouse and Florian, 1996), others regard it as a

> (...) process of increasing the participation of students in, and reducing their exclusion
> from, the cultures, curricula and communities of local schools. Inclusion involves
> restructuring the cultures, policies and practices in schools so that they respond to the

diversity of students in their locality. Inclusion is concerned with the learning and participation of all students vulnerable to exclusionary pressures, not only those with impairments or those who are categorised as "having special educational needs" (Booth *et al.*, 1997: 338).

Viewed in this way the term inclusion invites a broad interpretation of the processes and procedures that could be taken to bring about the changes in the educational and social lives of children and communities. According to some of the bodies representing parents of children with special needs specialist schools rather than mainstream schools offer the best opportunities for their children. In other words, inclusion as a policy could be defined in such a way that it allowed policy contradictions to co-exist.

Varying Stakes, Diverse Interpretations

Therefore it is not surprising to find that all government policy documents about inclusion contain these dilemmas at the core. They not only define inclusion from a value-based, philosophical perspective but also recognise that there will be a more pragmatic interpretation, based on real institutional practices, more or less leaving the decision to the implementing agent. It may be argued that the official definition of inclusion was couched in ambiguous terms so as to absorb several different versions that could form part of processes and procedures for implementing actors to follow. The difficulties about securing a clear statement of inclusion policy had the inevitable consequence that implementation practice varies considerably from one setting to another.

The framing of inclusion policy has been a long and elaborate process, with several revisions. These may be partly seen as involving feedback from implementation experience, but have also been influenced by other education policy developments, in particular the evolution of a quasi-market system that creates complications for inclusion policy. From the local perspective this process has involved the transmission into action of central policy objectives and aspirations by way of codes of practice and other guidance documents.

It is important to recognize that the inclusion agenda was imposed upon a system in which previously a high proportion of all provision for children with SEN was in special institutions. Hence, the implementation of inclusion was difficult, even if all the actors were enthusiastic about the new policy. Existing arrangements in respect of children, the employment of teachers and other specialised staff and the use of buildings had to be changed. All this was bound to take time, and would pose greater problems in some areas than in others. For instance, special schools were in demand and favoured by parents of children with autism, whereas mainstream schools were encouraged to take children with behavioural, emotional and social difficulties. While the schools dealt with the issues of

isolation and exclusion, the local educational authorities grappled with the financial implications. In this respect funding arrangements were crucial.

Overall English education policy has, since 1988, involved measures which reduce the role of local education authorities with a series of devices – particularly in respect of funding -- that by-pass them with direct mechanisms for connecting the central administration to the schools (Bache, 2003). In the case of inclusion policy, however, where the determination of resource use for a small segment of the total child population is spread across a broader community, the relationship between local educational authorities and their schools is the key to understanding the policy transfer processes at that level, which in turn determines implementation.

Local educational authorities' financial delegation targets, their special educational needs provision for schools after reorganisation of services, redirecting funds from statemented to non-statemented children with SEN, and the new role of local educational authorities as monitoring and advisory agents, were some of the prime policy issues that dominated the interactions between schools and local educational authorities. Figure 1 offers a simplified overview of the funding complications involved in the context of central interventions to influence the flow of resources to the schools. [The context here is characterized by very complicated financial arrangements between central and local government in the UK in which, particularly in the field of education, the centre exercises strong control over the availability of local funds – see Glennerster (2003).]

PLEASE INSERT FIGURE 1. ABOUT HERE

Across the period of policy development described above actual central government expectations about funding have varied. The intention here is not to focus on any specific arrangements but to highlight the complexities, and therefore dilemmas, inherent in the system. Central interventions have a strong influence on the divisions between category 1 and 4 in the formulation in Figure 1, seeking to ensure the passing on of funds from local educational authorities to schools in conformity with formulae driven by child numbers. Implicit in this are assumptions about what is needed for central administration and what should be passed on to schools. Complexities and controversies then emerge in respect of the extent to which specialist services can be decentralised in this way. This is a very important consideration in respect of support for children with very specific needs, such as those that arise in respect of autism and behavioural, emotional and social difficulties.

Hence questions arise about the allocation of additional funds (categories 2 to 6) which central policy makers have attempted to address through complex additions to the formulae.

However, local educational authorities are left with questions about how to operationalize arrangements and schools have views about the adequacy of any additions involved. In so doing, they are also redefining or interpreting inclusion as they make decisions on where to spend their valuable resources. Then, in addition, there are complications about the last two columns in figure 1. In respect of statementing there is an expectation that quite specific allocations *will* come to the schools for the needs of identified children, whilst for other children with SEN a rather less specific identification process is involved.

Evidence from the case studies showed how financial delegation targets had a varied influence on local educational authorities. These depended on arrangements they had for central services before these were imposed, and how subsequent reorganisation of special educational needs support services led to programme or policy mutations. These were particularly complicated by the distinction the legislation draws between provision for special needs in general and the specific obligations towards statemented children.

The reorganization of local specialist support services in a changing financial climate explains the wide range of support provision available for children with SEN. For instance, in some authorities, the core special educational needs services like the Educational Psychology Service suffered severe losses in terms of staff and time. In others, local educational authorities recruited more specialist staff to provide direct intervention and support to pupils with special educational needs in schools. The local financial contexts within which local educational authorities functioned acted heavily influenced the relationships between local educational authorities and their schools. As such these contexts acted as a defining force in determining the extent of special educational needs support available.

Local funding systems for allocating funds for special educational needs to schools differ considerably. Such variation complicates the way funds are redirected from pupils with statements to those without a statement. The result is that different groups of children with similar needs receive different levels of support depending on where they live. The relations between local educational authorities and schools were also influenced by pressures on the former to reduce the statementing costs and make necessary alterations in the local funding systems. The reduction in the proportion of children with statements was one of the main policy intentions of the government's Green Paper on inclusion (DfEE, 1997) but it did not have any national targets associated with it. This allowed the local educational authorities to set their own targets and develop strategies in conjunction with the schools to realize the national policy intentions.

Disagreements over making statutory assessments and issuing statements to children with special educational needs further added to the complexity of relations between local educational authorities and schools. Issues, such as the mismanagement of funds, staff shortages and inadequate support for children with complex and low incidence special educational needs, deteriorated relations in some areas. Schools varied in the extent to which

they welcomed the direct support and intervention provided by the local educational authorities and affected the way they interacted with them. These interactions were key to understanding the implementation results in different authorities.

Conflicts between schools and local authorities emerged from the issues that competed with one another for attention and scarce funds. Staff shortages, for instance, compelled schools to rely on their additional funds for recruitment and retention, a priority issue for school heads but not so much for the local educational authorities. Meeting the needs of children with SEN without a statement (and associated funding) was the first and most severely hit area as a result of these staff shortages. Lack of parental involvement in early stages of special educational needs decision-making led to conflicts at later stages of making provision, which severely affected teachers' ability to make 'promoting inclusion' a high priority issue. With the withdrawal of local educational authorities-funded staff training opportunities for teachers, schools had to spend from within their general schools budgets on training. Due to high staff turnover, this proved to be a big budget drain on schools. The only way to make up for loss of funds was to attract more from funds that accompanied a child with a statement. The unfortunate consequence of this policy was that children that came with statements acted as an alternative source of overall special educational needs funding for the schools.

It is important to emphasize that, in practice, implementation of inclusion policy implies a sequence of separate decisions on appropriate arrangements for individual pupils, drawn from a group with diverse needs and posing diverse challenges to the education system. It is likely to be these rather than the organizational arrangements that ultimately determine policy outputs. The inputs from parents (and, of course, sometimes the children themselves) are important for individual decisions. Individual disposition of parents, their behaviour and responses to policy intentions and the extent of cooperation (as against conflict) achieved with other actors can offer explanations variation in policy outcomes. However, they may also have an impact upon the organisational arrangements, particularly where there are child or parent support groups and active local and national voluntary organisations.

In the case studies, the disagreements between parents, schools and local educational authorities over issuing a statement for a child was identified as one of the major reasons for the breakdown of relationship and in some cases, communication. The local educational authorities were influenced in respect of their role in issuing statements by their financial interests, while the schools saw statements as a way of securing scarce financial benefits. Parents, predictably, had vested interests in securing statements for their children and might therefore find themselves in conflict with the local educational authorities. These different perspectives often culminated in contests which had to be resolved by Special Educational Needs tribunals. Disagreements occurred in respect of more general policy issues too. On the issue of special school closures, disparity of views among the local educational authorities, schools and parents were pronounced. Parents were divided in their response to local educational authorities proposals for special school alterations or closures. As they fought

with their local educational authorities, parents realised that financial alterations had given schools greater discretion over making special educational needs policies and hence shifted the balance of power in favour of schools. It made parents increasingly dependent upon the schools.

Implications for the Study of Implementation

More Than an Instruction

The case explored here involves a complex and contested policy issue, a complicated transfer process as the policy goals are realized in implementation, and an implementation process implying judgements by many. The case study shows that behind the apparently simple notion of educational inclusion there lie complicated questions. The primary question concerns the very meaning of inclusion, with the suggestion that inclusion in the regular education system will not always be in the best interests of the child. Then, for the translation of the aspiration towards inclusion into action there are questions to be addressed about the impact of that upon the management of the education system for all children. In this case and many comparable ones essentially normative, political and practical questions undermine any simplistic approach to treating a public policy as a mere instruction. Such a policy does not contain prescriptions that – by way of 'implementation' - simply have to be followed literally in order to produce the desired results. A public policy is more. It entails an expression of certain values with sometimes contrasting implications; social interaction between actors with various stakes in often a-symmetrical relationships, while in order to be 'implemented' the intentions laid down in the policy-on-paper need to be interpreted.

Expression of multiple values. In the case study it was shown that central government had engaged in a complicated process, reiterated across several phases, to try to arrive at clear guidance on how to translate inclusion into practice. The highly value-loaded character of the notion of inclusion itself made the provision of any straightforward guidance on what was to be achieved impossible. After all, it was never a case of ruling that all children should be enrolled in mainstream schools regardless of their needs and regardless of what the schools were able to offer. Furthermore that process has been complicated by the fact that this activity occurred alongside a sequence of changes to the administrative arrangements for schools as a whole.

Co-production of results. If we take the three crucial tiers in the field of inclusion policy - central government, local government and schools – we find actors from each of these tiers participating in the determination of the policy outputs in ways that undermine the formation/implementation distinction. The crucial points about this are as follows.

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- There is a sense in which central policy making activity implies a secondary policy formation activity on the part of local government. The guidance from central government leaves local government with issues about the applicability at the local layer about what is recommended. Issues arise about the 'fit' between central expectations and local circumstances. Crucial here are (a) the extent to there are costly implications about shifting away from previous arrangements (closing of special schools etc.) and (b) the local handling of and practical responses to central funding formulae. Responses on these and other points may be influenced by local views about the extent to which certain aspects of inclusion are desirable.

- Then these issues re-emerge in respect of the relationship between the local educational authorities and the schools. This is highlighted in respect of the implications for schools of taking both children with statements and others without statements but with special needs in the context of, first, national education policy which pushes the school into a position in which academic achievement and successful competition is emphasised and, second, both national formulae and local educational authorities policies that may (or may not) be regarded as offsetting the costs of taking these children.

- Hence any actual arrangements for included children will be a product of the interaction between what is deemed appropriate in general terms as determined 'vertically' between central government, local government and the schools, and, 'horizontally', the choices or demands parents actually make. In this context it is important to bear in mind that provisions to include parent participation are incorporated in the policy as are arrangements to enable individual parents to make representations to an independent appeal tribunal.

Interpretation of intentions. The last point highlights the fact that there is an important 'street-level' dimension to this policy. There is a variety of professional groups who participate in the street-level decision making; not just teachers, but also educational psychologists, psychiatrists, health care workers, and so on. These professionals are likely to take views on the desirability of inclusion in specific cases and on the resources needed. Individual 'statements' functions here as a crucial influence upon policy outcome, both in terms of the stance they take on a child's learning difficulties and on the resources needed to help to overcome them.

Research Implications

As we have seen in the case of inclusion, 'the' goal of a public policy often may be an

ambiguous and multi-faceted one. Seldom will a policy goal have a singular, straightforward and comprehensive meaning; probably no one will assert that total inclusion is a desirable outcome. Hence there are likely to be difficulties for research designs that may still embody the normative concerns indicated with terms like 'deficit'.

The premise of this article is that such a case is not an outlier. Very similar issues may be found, for example, in relation to the reorientation of the provision of social care towards direct payments and personal budgets (Fernandes *et al.*, 2007) or to efforts to alter clinical practice in medicine (Harrison and McDonald, 2008, chapter 3). In such circumstances it is contended that the use of expressions like 'implementation deficit' or 'the implementation gap' is inappropriate. The policy formation/policy implementation distinction may be unhelpful; implementation must be seen *as part of* an ongoing process of policy making. It may be the case that actors in some parts of this continuous process have policy goals that are frustrated in practice. Then of course the democratic theory notion also applies, that it should be regarded as particularly problematical if those actors are members of an elected local government. The sources of that frustration, however, may be as much the multi-dimensional character of the process involved as a lack of collaboration or commitment from other actors. Besides, condemning a situation cannot replace its systematic analysis.

When a public policy entails multiple values, which are expressed in a process of ongoing social interaction between actors with various stakes, while inviting diverse interpretations; in short, when a policy is more than a technical instruction, then the following research issues can be identified. First, there is the issue of the *explanandum*: What needs explanation? If policy goals as inputs cannot be equated with policy results as outputs (let alone outcomes), a too immediate judgement on goal achievement seems misplaced. Second, the issue of *locus specification* needs attention. Conflict in respect of the resolution of ambiguities should not necessarily be taken to be a product of conflict over the policy as a whole. Even in situations of high consensus there may be conflict over detailed implementation. Using a two-by-two distinction as Matland (1995) does is helpful but rather polarises the matter. In the case of many of the issues around more complex policies, while there are likely to be some conflicts, it is possible to find a general consensus in favour of action. However, there will be problems – about which there may be conflict - lying around the alternative ways of resolving ambiguity. The picture becomes even more complex when looking at the implementation part of a policy process both within public administration and in society, 'vertically' and horizontally'. Within the system of inter-governmental relations then actual as well as legitimate policy making may be observed at unexpected places. Researchers therefore may be encouraged to specify the actors, action situations and political-administrative layers.

Third, there is the issue of the *appropriate unit of observation and analysis*. When the practice of implementation, let alone policy results, cannot be 'read off' from paper, the study of official policy documents does not suffice to explain what happens. The injunction to try to single out outputs that can be studied without any reference to actual policy intentions, should

be followed wherever deemed useful and feasible. However, there is a chance that this oversimplifies the explanation of what happens in the implementation process ignoring co-existing alternative results. The range of activities public servants at the street level are engaged in while performing their tasks will usually go beyond what has been articulated in formulated policy objectives. In other words, using their discretion teachers may still act in the best interests of their pupils and realize outcomes deemed both legitimate and desirable, while in the literal sense going beyond the instruction they have been given.

Thus the advice for researchers comes down to: Be explicit about the dependent variable; also about the actors and activities looked at and focus on action at the micro level. This leads on to another consideration about research. In a practical sense a multi-dimensional policy implementation situation like that analyzed here seems to call for a number of separate research strategies. These might all be subsumed within one grand project, but the realities of research funding and management make that either improbable, impractical or both. Consequences for research can be identified along the lines sketched above, while specifying the following separable tasks.

First, central government efforts to frame objectives in a form that can be operationalized at the layer of local government, can to be explored. Particularly the identification of potential conflicts with other aspects of policy needs attention, and the drafting of guidance that takes into account practical considerations for local government. Policy objectives are value-loaded and should be analyzed accordingly. Actors differ on the importance of inclusion or on the way to achieve it. Regardless of their commitment to the goal of inclusion, the local educational authorities discussed above will have to take its cost implications into account. Schools have similar concerns, together with anxieties that inclusion may be problematical for other goals they have adopted, or had imposed upon them. Research modelling incorporating these factors is quite feasible, but in this case it is essential to avoid the blaming that seems to have got embedded in the vocabulary usually accompanying a top-down approach to implementation.

Second, following on from this, the responses by local governments and other stakeholders may be compared. There is politics involved, both in vertical and horizontal relationships. Jurisdictions are often overlapping rather than exclusive. The number and nature of stakes involved goes beyond those of the political-administrative 'decision makers' versus those of the 'implementers'. There are alternative stakeholders with different views of what policy 'success' might involve, and this means that policy formation goes on. Given that there are multiple 'implementers', research may involve quantitative comparisons, qualitative case studies, or of course some combination of the two. Here – and in respect of the next task category – we stress that the requirements of systematic research can be met without recourse to the language of blame. Different implementers achieve different outcomes; the variation between these outcomes needs explaining. Of course one explanation may be unwillingness to comply with explicit policy transmitted policy goals, but this is something that may come

out at the end of the research process and need not (probably 'should not') dictate the terms of the analysis.

Third, the examination of responses by actual implementing agencies - in this case: schools. Here too there may be scope for comparison between institutions. There is, however, a complication that surely pushes research designs more in the qualitative direction. The complication concerns the fact that in any single area of public administration policies and practices within any particular agency will not be independent of those of others. The response to any agency needs to be seen as within a system; what one agency does will have implications for others. The corresponding problem about comparing agencies in different administrative areas will be that they will be affected by policies that may be unique to the area within which they belong. The implementation part of a policy process is more than a technical matter. Those who research it should recognise the complexity to be handled by those who manage it.

Conclusion

Any explanation of how a complex policy system works in practice, and why, needs to give attention to the interactions that determine those outcomes. A generalized national initiative mediated through local governments and street-level implementers ultimately involves a sequence of separate decisions involving interactions between customer preferences and the actions of implementers. Amongst the various research designs, in this respect there is a strong case for a backward mapping exercise of the examination of the way in which street-level bureaucrats take on a policy in practice (see Elmore, 1980). This last category can be divided into two: issues about how street-level bureaucrats make their decisions, and issues, close to the evaluation end of the agenda, about how these are experienced by the recipients of policy.

Concerning this last point it seems relevant for implementation studies to take on board observations from evaluation studies about the use of alternative dependent variables. Explicit within the controversy over inclusion is the contrast between treating the maximization of educational mainstreaming as an output variable and the more difficult question about having regard to the best ways of meeting the needs of the child. Following Winter's advice to focus only on output may be difficult here inasmuch as the fact that central policy has involved efforts to maximize parental participation makes it worthwhile to consider the inclusion of parent satisfaction as another dependent variable.

Through the exploration of a specific example of a specific policy in which the 'top' has been active, the object of this article has been to challenge approaches to implementation research that work with simple models of the policy process, particularly when they involve a simple

stress upon gaps or deficits. Instead, a strong emphasis has been put upon the highly value-loaded character policy goals may have. In what Brodkin (2007: 2) calls an 'indirect politics of administrative practice' these goals are accompanied by ongoing, multi-layered policy-making and the need for interpretation. However, this neither leads to a view that systematic research is impossible, nor that it can be done only in the form of 'deficit analysis'. Rather, it is to be recognized that in a variety of ways 'cuts' can be made into a policy process, to throw light on what is really going on when a policy is being implemented.

References

Audit Commission/Her Majesty's Inspectorate (HMI) (1992) *Getting in On The Act.* London: HMSO.

Audit Commission (2002) *Statutory Assessment and Statements of SEN: In Need of Review?* Policy focus. London: HMSO.

Bache I. (2003) Governing through Governance: Education Policy Control under New Labour. *Political Studies* 51(2): 300–314.

Barrett S.M. and Fudge C. (1981) Examining the Policy-Action Relationship, in. Barrett S.M. and Fudge C. (eds) *Policy and Action: Essays on the Implementation of Public Policy.* London: Methuen, pp. 3–34.

Booth T., Ainscow M. and Dyson A. (1997) Understanding Inclusion and Exclusion in the English Competitive Education System. *International Journal of Inclusive Education* 1(4): 337-355.

Brodkin, E.Z. (2007) Bureaucracy Redux: Management, Reformism and the Welfare State. *Journal of Public Administration, Research and Theory* 17(1): 1-17.

Department for Education and Employment (1997) *Way Forward for Early Years Education Announced.* London: DfEE.

Elmore R.F. (1980) Backward Mapping: Implementation Research and Policy Decisions. *Political Science Quarterly* 94(4): 601–616.

Evans J. and Lunt I. (1994) *Markets, Competition and Vulnerability.* Institute of Education, University of London: The Tufnell Press.

Fernandes J-L., Kendall J., Davey V. and Knapp M. (2007) Direct Payments in England: Factors Linked to Variations in Local Provision. *Journal of Social Policy* 36(1): 97-122.

Glennerster H. (2003) *Understanding the Finance of Welfare*. Bristol: Policy Press.

Goacher B., Evans J., Welton J. and Wedell K. (1988) *Policy and Provision for Special educational needs*. London: Cassell.

Goggin M.L., Bowman A.O'M., Lester J.P. and O'Toole Jr L.J. (1990) *Implementation Theory and Practice: Toward a Third Generation*. Glenview Ill.: Scott Foresman/Little, Brown and Company.

Harrison S. and McDonald R. (2008) *The Politics of Health Care in Britain*, London: Sage.

Hill M.J. and Hupe P.L. (2014) *Implementing Public Policy: An Introduction to the Study of Operational Governance,* 3rd edn. London: SAGE.

Hjern B. and Porter D.O. (1981) Implementation Structures: A New Unit of Administrative Analysis. *Organization Studies* 2(3): 211–227.

Hogwood B.W. and Gunn L. (1984) *Policy Analysis for the Real World*. Oxford: Oxford University Press.

Hupe P.L. (2011) The Thesis of Incongruent Implementation: Revisiting Pressman and Wildavsky. *Public Policy and Administration* 26(1): 63-80.

Lipsky M. (1980) *Street-Level Bureaucracy: Dilemmas of the Individual in Public Services*. New York: Russell Sage Foundation.

Matland R.E. (1995) Synthesizing the Implementation Literature: The Ambiguity-Conflict Model of Policy Implementation. *Journal of Public Administration Research and Theory* 5(2): 145–174.

May P.J. and Winter S.C. (2009) Politicians, Managers and Street-Level Bureaucrats: Influences on Policy Implementation. *Journal of Public Administration Research and Theory* 19(3): 453-476.

McConnell, A. (2010) *Understanding Policy Success: Rethinking Public Policy*. Basingstoke: Palgrave Macmillan.

O'Toole Jr. L.J. (1986) Policy Recommendations for Multi-Actor Implementation: An Assessment of the Field. *Journal of Public Policy* 6(2): 181-210.

Pawson R. and Tilley N. (1997) *Realistic Evaluation*. London: SAGE.

Pressman J.L. and Wildavsky A. (1984) *Implementation: How Great Expectations in Washington are Dashed in Oakland* (...), 3rd edn; 1st edn: 1973; 2nd edn: 1979. Berkeley:

University of California Press.

Riddell S. (2000) Inclusion and Choice: Mutually Exclusive Principles in Special Educational Needs? In Armstrong, F., Armstrong, D. and Barton, L. (eds.) *Inclusive Education: Policy, Contexts and Comparative Perspectives.* London: David Fulton.

Rouse M. and Florian L. (1996) Effective Inclusive Schools: A Study in Two Countries. *Cambridge Journal of Education* 26(1): 71-85.

Warnock M. (2005) Philosophy of Education Society of Great Britain, Baroness Warnock, *Special Educational Needs: A New Look*. No. 11 in a series of policy discussions.

Wedell K. (1990) The 1988 Act and Current Principles of Special Educational Needs, in Daniels H. and Ware J. (eds.) *Special Educational Needs and National Curriculum.* London: Kogan Page.

Winter S.C. (2006) Implementation, in B.G Peters, and J. Pierre (eds.) (2006) *Handbook of Public Policy*. London: SAGE, pp. 151-66.

Figure 1. The Funding Mix of Inclusive Education Policy in the UK

	Resources for all children	Resources for children with SEN	Resources for SEN-children with statements
Kept in the hands of the LEA	1	2	3
Passed on to the schools	4	5	6