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Evaluating policy with a modified "policy cycle" – the NSW Healthy School Canteen Strategy

Are school canteens just for profit, or should they promote healthier lifestyles? After decades of lobbying from public health experts, the NSW Government adopted the Healthy School Canteen Strategy in 2004. What galvanised the NSW Government into acting to achieve real change in school canteens?

To answer this question, we developed an approach to evaluating public policy by adapting two models of policy theory. We used the 'policy cycle', which describes policy development as a sequence of steps from issue identification through to implementation and evaluation, to frame the evaluation. We modified this model by including analysis of the vertical formal decision-making structure of Government, with a horizontal dimension, the bargaining between participants in a policy process.

In this paper, we outline how we applied the modified framework in the evaluation. We reviewed what action was taken at each stage, how effective that action was, and how it contributed to later action. As a result, the evaluation was able to explain how and why the strategy gained political, agency and community support.

The NSW School Canteen Strategy
The NSW Healthy School Canteen Strategy is based on a food spectrum; 'green' – foods that are nutritionally dense and should occupy most of the menu; 'amber' – foods to select carefully and should not dominate the menu; and 'red' - foods that can only be sold a maximum of twice per term – defined by specific nutrient criteria (energy; saturated fat; sodium content). All NSW Government schools have been advised through a Departmental policy to adopt the Strategy in their canteens from Term 1, 2005. Catholic and independent schools support the Strategy and recommend schools that schools in their sectors adopt it.

The NSW School Canteen Strategy is worthy of a policy evaluation because it required interagency cooperation between two agencies with only a limited history of developing joint policy and there was a significant role by the central decision-making arm of Government. The policy faced significant implementation barriers from external and internal stakeholders with long-standing conflicts of views on both the need for a policy and the details.

The effectives of the Strategy, its uptake by schools and changes to school canteen measures is being formally evaluated by NSW Health.

Current policy theory
Policy development is an iterative process. There is no one neat definition of policy or a standardised process for developing policy.

One school of thought has promoted the notion of policy development being a cycle, moving through stages from issue identification to evaluation. Bridgman and Davis (2004) offer an Australian model (Figure 1), with the following stages:

- issue identification
- policy analysis

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- policy instruments
- consultation
- coordination
- decision
- implementation
- evaluation.

Figure 1: An Australian policy cycle model (Bridgman & Davis, 2004)
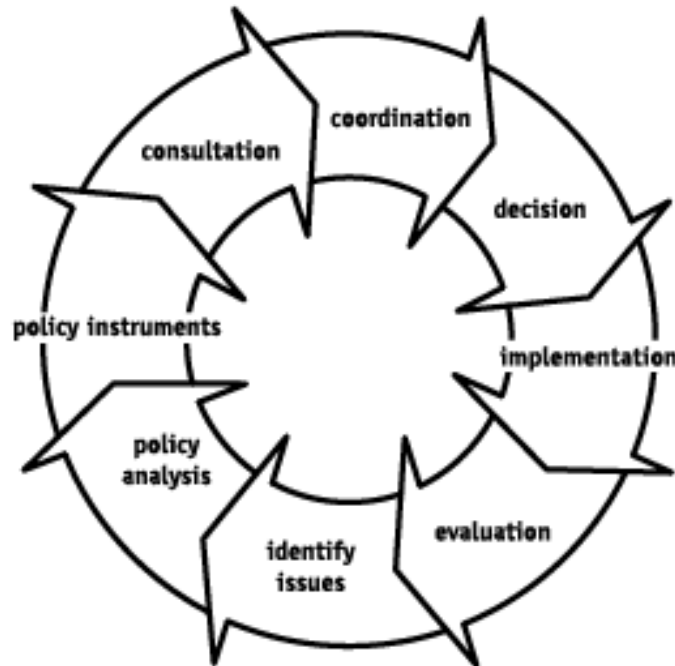
There is reasonable criticism of this approach in that the policy development process is often opportunistic and driven by events and circumstances, rather than a process of rational choice with clearly defined goals. The major criticism is that the cyclical model is an ideal, and does not represent what really happens in policy development.

Colebatch (2002) in particular has argued that the context of the policy process is more important than the notional stages in the cycle, and that the context drives the action that is taken. He proposes that policy development contains 'vertical' and 'horizontal' dimensions. The vertical dimension is the formal decision-making structure of Government, where a policy is an expression of a decision by an elected authority (Cabinet, Minister). The horizontal dimension is the process of negotiation and bargaining that takes place between the players in the process – staff in relevant agencies, stakeholders, and customers – each with their own interests which may or may not coincide. The policy development process then becomes an iterative relationship between these horizontal and vertical dimensions.

Evaluation approach
The evaluation drew on both these arguments. The policy cycle was used as an analytical frame for exploring the process of developing the NSW Healthy School Canteen Strategy. We used this framework to review what action was taken at each stage in the process, how effective that action was, and how it contributed to later action. However, we also recognised

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that the process was iterative and that there were effectively many 'sub-cycles', particularly in the analysis-instruments-consultation-coordination phases. Colebatch's vertical and horizontal frames was used to explore those sub-cycles within each of the 'stages', to discuss the interaction between a centrally made decision and the expression of that decision in the negotiations between key players.

Issue definition

New policy needs both political and community support for change and the NSW Childhood Obesity Summit in 2002 provided the impetus for policy change in the area of health school canteen menus. In this case, the process of **defining the policy issue** through the Summit was important in garnering public support and in framing school canteen food as a public health issue. Importantly, it provided a forum to demonstrate central commitment by the relevant Ministers for action.

The Summit raised the public profile of health impacts from obesity and school canteens were framed as part of an integrated solution to the issue of obesity, and overweight. The Summit resolutions and the views of stakeholders expressed at the time provided strong directions for the policy response, which was that Government policy and actions be heavily focused on public health strategies to change the food supply in schools.

The Summit allowed for the expression of views on appropriate actions early in the process, rather than exploring them through other formal processes such as white papers. These views had a significant bearing on subsequent action. From a theoretical perspective, the Summit was a way of integrating the vertical and horizontal components of the policy consultation process.

Policy analysis

The policy analysis stage involved setting up of committees to gather information and negotiate the details of the policy.

There were multiple steps in the **policy analysis** phase, with each step mirroring in part the policy cycle. The Strategy moved through five broad steps in this phase: initial clarification of the issues; further clarification of the issues; development of a generic model; development of a specific model; and then refinement of the model. Each stage involved significant horizontal interactions, formally through the Committees and informally through contacts between participants.

The first step in November 2002 was a meeting of a reference group with the Minister for Education and Training, to fulfil the commitment made at the Summit. It appears that food industry and some non-government education stakeholders in this meeting with the Minister attempted to redefine the approach, in particular to explore alternatives to mandating requirements for canteens.

At the same time, the NSW Government established a Senior Officers Coordinating Committee to develop the response to the Summit recommendations, chaired by the Cabinet Office. A School Canteen Advisory Committee was established with key stakeholders to provide advice to the Senior Officers Coordinating Committee. This Committee was co-chaired by the Deputy-Director General and Chief Health Officer from NSW Health and the Assistant Director General from the Department of Education and Training.

Different agencies were allocated 'lead' responsibility to develop responses to specific recommendations in consultation with other line agencies, central agencies and relevant stakeholders. NSW Health and the Department of Education and Training shared lead responsibility for the development of the response to the recommendations relating to school canteens.

In practice, stakeholders reported that NSW Health took a lead role in the process and in servicing the Committees. NSW Health was allocated dedicated funding to implement obesity prevention initiatives, and primarily resourced many of the components of the Strategy, such as the development, publication and printing of the resources, and the funding of project staff. NSW Health also holds the expertise and has the structure to work on specific projects such as the Strategy. For the direct participants, the lead role taken by NSW Health was an appropriate and an effective way of making progress quickly. All participating agencies have contributed through in-kind resources.

At this stage there were simultaneously different levels of activity underway. This is important to the story of the development of the Strategy because those relationships provided a mechanism for **coordinating the development of the Strategy** and substantially framed the nature of the discussion, with a 'nesting' arrangement of committees and authority and formal interactions (regular committee meetings) and informal interactions (phone calls and emails between individual participants). Those lines of communication linked vertically (up and down between the committees) and horizontally (between agency staff and other stakeholders):

- centrally – the Senior Officers Coordinating Committee developed a whole-of-Government 'response' to the Summit recommendations. The purpose of this was to propose to Cabinet a plan which would outline a program of action
- horizontally – the School Canteen Advisory Committee of senior officers and representatives explored the detail of a mandatory approach. This Committee was an effective mechanism for ensuring that the "policy community" was involved in all discussions and committed to consulting their own sectors, so that an acceptable and workable Strategy was developed. The food industry was not represented on this committee (a deliberate strategic choice which reflected the belief that the Summit had set the policy direction). As such the food industry representatives interviewed for this review do not believe that the consultation processes were appropriate
- detail – a working party reporting to the Advisory Committee prepared background material for consideration by the Committee.

Policy instruments
The policy instrument in this case is a commitment expressed in Departmental policy from the Department of Education and Training. It is mandatory in that all Government schools are expected to implement the Strategy, but it is not expressed in regulations or legislation. The Strategy therefore is normative, in that it outlines something that should happen. Implementation relies on significant interactions between the stakeholders, so there is a strong focus in the Strategy on educating Principals and canteen managers. School Principal representatives strongly believe that the Strategy should apply equally to non-Government as well as Government schools. However, for most stakeholders, this instrument is perceived as a reasonable compromise for this issue.
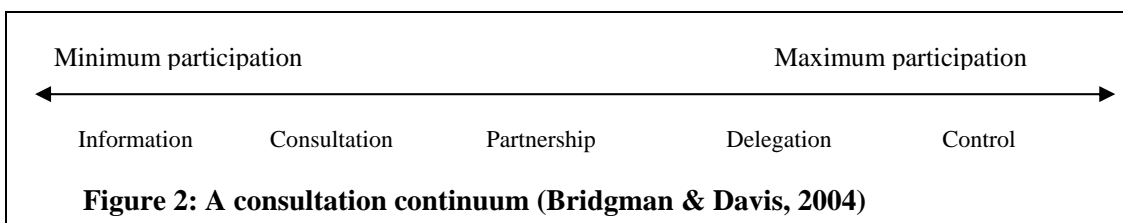
Decision phase

The decision phase of the policy cycle was a less important step for the Strategy. The Government made a general commitment to taking action on school canteens at the Summit, and any major issues around implementation were largely resolved at agency level. Central commitment (the vertical dimension of Government) was important to continue progressing the development of the Strategy, but this was more as a way of facilitating the process. Having the Premier launch the Strategy was an important symbolic gesture, which added some extra weight to the Strategy's acceptance at the agency level.

The major strength of this policy process was the very strong eye on **implementation** at all stages of the process. The policy instrument itself was selected and refined with a strong view to how it would be implemented. Significant resources were devoted to support materials and information. A major component of this was the funding by NSW of a project coordinator who worked within the Department of Education and Training. Both agencies expressed the view that this was a very effective model for achieving interagency coordination on a complex issue.

Consultation phase

Proponents of good policy process argue that appropriate consultation is essential. There are numerous examples of good policy proposals that have floundered because of inappropriate consultation at different stages of the cycle. Consultation and issues management are increasingly components of the policy process.

Consultation occurs in a range of different ways and to different degrees. In some projects, there is considerable public discussion and negotiation of issues. In others, this is more limited (for example, questions of national security; emergency responses). Bridgman and Davis have suggested a continuum (Figure 7.1) to characterise the types of consultation that occur in policy processes.

Minimum participation   Maximum participation

Information   Consultation   Partnership   Delegation   Control

Figure 2: A consultation continuum (Bridgman & Davis, 2004)

There are a number of interesting features of the consultation process in regard to this policy. The:

- NSW Childhood Obesity Summit was a very public process and presented Government with a proposal for a mandatory approach to school canteen menus. This represents a high degree of consultation within the particular framing of the issue – close to 'delegation' in the above continuum
- School Canteen Advisory Committee involved a degree of consultation close to 'partnership' on the above continuum, where key stakeholders were actively involved in the design of the policy intervention. However, the issue of whether the policy was mandatory and to some degree, the policy instrument (a Ministerial announcement), were determined centrally

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- food industry had only limited involvement in the development of the form of the policy response, and the relationship with industry is closer to 'information' on the above spectrum. Consultation on the second release of resource materials – the Toolkit - occurred later in the process
- nature of the ongoing media coverage may have had a bearing on the viewpoints taken by the various stakeholders.

In Summary

This paper has explored an approach to evaluating a policy development process. The policy cycle has provided a useful frame for explaining the historical sequence of events. However, the cycle alone does not allow for sufficient examination of the horizontal and vertical interactions between participants in the policy process, and we have modified the cyclical model by including 'sub-cycles' at each stage to explore the bargaining between participants that occurs at each stage.

In this case, the phases that have had the greatest impact on the end result have been:
- the shaping of the issue as a public health issue through the Summit
- a central Government commitment to take action – i.e. significant vertical support
- a pragmatic choice of policy instrument
- designing the policy intervention with a strong eye to its implementation, and
- the commitment of dedicated resources to development and implementation of the Strategy.

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