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Chapter 7
Policy Input on the Front Line
Dilemmas of the Ethical Academic
Margaret Greenfields

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<CN>Chapter 7

<CT>Policy Input on the Front Line

<CST>Dilemmas of the Ethical Academic

<CA>Margaret Greenfields

<FL>This chapter sets out to discuss the ways in which academic-activists can most effectively and ethically engage with the development of public policy. In particular, it focuses on methodological challenges and the risk of unintended consequences when policy recommendations are poorly thought out or delivered. For many academics, the craft and practice of policy formulation is considerably outside their theoretical knowledge or disciplinary training, such that they often lack awareness of the ways in which their research may translate into potentially flawed policy. Accordingly, there may be a mismatch between intent and outcome, both in terms of the techniques academics use when seeking to engage with and influence policy professionals, and in how findings are ultimately translated into policy guidance. While it is widely accepted that there is an absolute necessity for ethical coproduction of policy recommendations in partnership with Romani and other communities directly impacted by enactments, this chapter argues that there is also a requirement for closer collaboration with the policy community, including the development of shared understanding of policy paradigms and techniques. An example is provided from the author's own pedagogic practice of the ways in which skills-based training which uses innovative, practical, policy-making processes, co-

delivered by community members and those tasked with enacting policies, can greatly enhance the effectiveness of commissioners, service users, and academics. Such collaborative design and delivery, it is argued, may effectively deliver appropriate and reflexive solutions to tenacious social challenges. In order to comprehend the pitfalls and opportunities open to the scholar intent on influencing policy (regardless of whether they are themselves of Romani heritage or concerned *Gadjé*), it is important to outline both the various categories of engagement that are potentially open to leverage, and the challenges that frequently face the academic activist who may be unfamiliar with the processes of policy construction.

Activism, defined as “action undertaken on behalf of a cause which goes beyond that which is routine or conventional” (Martin 2007: 19), requires the analysis of the professional expectations of an “academic,” in order to contextualize the debate on what constitutes an academic-activist and sketch out the desirable role for activism within the professional academic environment. Given the increasing administrative regulations and duties that require an academic’s activities to fall within the rubric of departmental, faculty, and institutional priorities, it would appear that little scope exists for the radicalism and passionate commitment associated with activism, and defined by Martin (2007) as “[going] beyond conventional politics, typically being more energetic, passionate, innovative, and committed.” However, I argue that for those whose primary orientation is academic (rather than those who consider themselves primarily as activists merely earning their income as academics, or those who seek to strategically use their role in the academy to support their activism), there is space within their professional role to support or engage in activism in several ways.

First, a researcher may utilize action research as their primary method of investigation, a model that consciously sets out to validate community experience and empower nonacademic

participants through sharing knowledge. Second, teachers may critically challenge and engage with normative discourse, interpretations of findings, and theoretical models. This approach can lead to life-changing impacts on student understanding, their future career paths, and engagement with sociopolitical activities. Finally, and increasingly common (albeit in some cases driven by funders' insistence on assessable impact and community engagement pathways), research may be designed from the outset to engage with communities and service users. Depending on the skills, confidence, and approach of the principal investigator, such engagement may, however, range from the merely tokenistic, lowest stage¹ on Arnstein's (1969:217) "ladder of participation," to fully collaborative sharing of a range of research tasks, analysis, and coproduction of outputs (SCIE 2012). The higher rungs of the ladder, designated as "citizen control" by Arnstein (1969:222-224), range from partnerships working through delegated power over actions, to perhaps the most utopian—that of citizen control.

For academics involved in such policy-engaged work, which may sit anywhere along a continuum of conscious academic activism to funder-driven community collaboration, it can be argued that to operate at the most effective level, a mode of practice is utilized that takes account of multiple (and potentially conflicting) needs of parties, while retaining a pragmatic yet ethical commitment to ensuring recommendations are feasible enough to ensure recognition within the sphere of policy influence. As Flood et al. (2013) discuss, academic-activists may be subject to a significant degree of peer (and external) criticism and attempts to limit their activities through mechanisms ranging from dismissal of interpretation of data as propaganda, to resistance to publication of findings seen as controversial and hence potentially contrary to institutional interests. However, if contentious politicized outputs are developed, it is recommended that the researcher maintains a pragmatic stance, ensuring that colleagues and senior staff are kept

appraised of research activities and the range of potential external responses to recommendations at all stages of the process, creating space to enable reflective review of impact. Thus, institutional protection from hostile challenges can be claimed, enabling the activist-academic to simultaneously use their professional expertise and operationalize the core academic claim of freedom of speech, backed up by internal peer review of findings and recommendations. In this way, counterarguments to criticisms can be rehearsed in advance, while the authors are also able to gain awareness of the likely stance of institutional management teams to critiques. Such practices enable collaborative working with university media professionals to productively and effectively present findings in a manner that can foreground key recommendations.

These processes can be used also as a way of meeting the benchmark of an even-handed review of evidence, such that outputs enable critical engagement with the more complex question of how best to meet the simultaneous—and at times conflicting—needs of policy makers and end users.² On this latter point, it is worth reminding the activist-scholar that a degree of watchful critical awareness must be retained when considering the purposes of policy and the standardized “rules” of policy-making, a point expressed by a number of academics who are highly critical of normative approaches to policy-making, and who argue that policy as enacted typically maintains the status quo rather than challenging unjust social hierarchies (Okely 1983: 232; Powell 2011; van Baar 2005; 2011; 2012).

Powell (2011), in a study of how professional discourse and perceptions of British Gypsies and Travellers inform the activities of welfare agencies, emphasizes the need for both researchers and policy makers to pay attention to the impact of social processes on minority cultures, stressing both the complexity of power dynamics and the subtle ways in which power can be exercised, leading to repressive outcomes when professional discourse translates into

policy enactments or procedures. Similarly, van Baar (2012) persuasively argues, through the use of case studies from the Czech and Slovak republics, that Roma “policy,” as enacted, can essentially become the equivalent of policing Roma populations. He argues that top-down evaluation criteria may create a narrative of self-improvement, and the development of projects that are only counted as successful and worthy of achieving repeat funding if the outcomes produce subjects who are perceived of—in normative terms—as responsible, self-controlling, and increasingly independent of the state (van Baar 2005). In an elaboration of this thesis, van Baar (2011) explores how widespread reliance on experts with limited knowledge of local contexts, or the standardization of techniques and milestones presented as politically neutral technologies that improve Roma socioeconomic status, have actually resulted in controversial forms of Romani internalized governance and a hierarchization of behaviors and subjects that can lead to the dehumanization of some of the most marginalized Roma populations.

Despite these highly pertinent concerns, raised, it is respectfully argued, predominantly by academics who operate outside of the practical policy-making domain, and who may thus be unfamiliar with some concerns and constraints under which policy formulation occurs (Gaudreau and Saner 2014), scope does still exist to make recommendations that use classic policy-making processes. Use of models that are familiar to the policy community (Sabatier and Weible 2014) but which also include in-built reevaluation phases and checks and balances so as to ensure that localized and nuanced interpretations occur, ensures that community actors are provided with mechanisms that create opportunities to engage with the higher levels of Arnstein’s (1969) ladder of participation outlined above (Marsh and McConnell 2010).

In the light of the above salient reminders of the dangers that unnuanced (and indeed incautious) policy advice can represent to communities framed as disempowered or

nonnormative, we turn now to the issue of how best to deliver guidance that meets the needs of the policy community in fulfilling their primary mandated role of delivering initiatives that engage with perceived social problems and seek to improve the quality of community life (Spicker 2014). In so doing, however, recommendations must include mechanisms and controls that offer some realistic chance of delivering effective and life-enhancing interventions, rather than merely creating space for the recycling of negative tropes and social control of Roma people (Surdu and Kovats 2015; see also Ivasiuc, this volume).

<HDA>Becoming a Policy “Inexpert” and Collaborative Working on Roma Policy

Development

<FL>While academics from a relatively broad range of disciplines have in recent years become more actively engaged in policy development on Roma issues, it can be seen that this shift has directly arisen from Europe-wide governance and concern over the collective condition of Roma populations, and—to no small extent—the release of funding and opportunities for policy expertise to be recognized in a transnational context. Subsequent to the Council of Europe’s formal recognition of the plight of Roma minorities throughout the EU in the early years of the twenty-first century, and the concerted drive that followed to improve the situation of this most marginalized of populations, there has been an explosion of academic interest in the field of Romani studies.³ Not only has the number of academics commissioned to undertake research activities and engage in delivering policy advice to EU agencies expanded exponentially in recent years, but a simple search for academic publications on Roma reveals that between the years 2000/01 and 2015/16, the annual rate of publication had grown from approximately 360 papers per annum to approximately 2000 per year.

Similarly, a web review reveals that funded Ph.D. studentships and postdoctoral fellowships that focus on the field of Roma “integration” or specific aspects of Roma health, gender, migration, history, linguistics, etc. have expanded dramatically. Throughout Europe, numerous higher education institutes, which in 2010 had no identified staff working in the field of Romani studies, or which did not appear to offer supervision to students in such a field, were frequently, some seven years later, offering relatively substantial doctoral funding and providing specialist advice in such areas of research.

Thus, for example, a discussion network founded at King’s College London in 2014, which consisted initially of only U.K.-based graduate students and supervisory staff engaged in Romani studies, has grown from nine invited members to in excess of forty participants from a number of European countries in under three years, with new members joining prior to each meeting, often funded by their European institutions to present at the sessions. During the past two years alone, a not insignificant number of academic supervisors of doctoral candidates (often from elite institutions and typically supervising their first student in the field of Romani studies), have also joined the regular discussion sessions during which students present on their research findings and debate emergent trends in Romani studies.

Moreover, the author’s analysis of the membership data pertaining to the European Academic Network of Romani Studies (EANRS) bears out this picture of ever increasing interest in the field of Romani studies. EANRS is a network for academics and doctoral students working in this field funded by the Council of Europe between 2011 and 2015, with a stated aim of “facilitating intercultural dialogue and raising the visibility of existing research outside the academic community in order to foster cooperation with policymakers and other stakeholders” (see also Ryder, this volume).

As of June 2016 (drawn from materials provided by the EANRS secretariat), the network had 420 members in forty countries, of which 249 full members hold Ph.D.'s in a range of subject areas, predominantly related to social sciences such as anthropology, sociology, or cultural studies. Overall, just under 10 percent of members (twenty-six members) either held a doctorate or were studying at doctoral level with a specialization in political science, while 5 percent held a terminal (doctoral or higher) degree in legal studies. A mere seven members (all holding doctorates) were trained in social policy or public policy administration.

An in-depth analysis of membership data undertaken by the secretariat some three years previously (EANRS 2013) reported that of the (then) 395 members, 194 were of postdoctoral standing, of which a large majority (144) had received their doctorate after the year 2000. The (at that time) remaining 201 members were associate members studying for a higher research degree in the broad interdisciplinary field of Romani studies, with a particular emphasis on anthropology or sociology. In the three years between the time the earlier analysis was published and the latest membership list was received in June 2016, the proportions of full (holding a doctorate) to associate (studying for a doctorate or holding a master's degree) members of the network had remained relatively static, reflecting both an increasing interest in the broad field across time, and the successful completion of doctoral study by former "associate" members. In terms of specialist disciplines embraced by members, these remained broadly similar, although with a slight shift in disciplinary fields, with a small decline in the percentage of those working in anthropology and sociology and a mild increase in numbers working in the disciplines of human rights law, legal studies, and political science. There was, however, no increase in the number of those members claiming training in social and public policy analysis or administration.

Given that both the 2013 analysis and available data from 2016 reveal that the academic disciplines (in descending order) from which the greatest number of EANRS members were drawn were anthropology, sociology, history, and ethnology, with political science, human rights/legal studies, and social policy/administration nearer the bottom of areas of expertise, it would appear that there is something of a mismatch in terms of numbers of members who have received academic training in those areas potentially most pertinent to policy development. The claim for particularity and special relevance of certain disciplines to policy engagement is made not in an attempt to reify specific subjects, but to highlight the fact that academics engaged in research with Roma are noticeably unlikely to come from either specialist policy backgrounds or practice-oriented disciplines such as law, social work, or health sciences. These latter specialisms have long grappled with the implications of the interface between policy and practical outcomes for client groups (Adams 2002; Laverack 2012), a form of engagement removed both from microlevel ethnographic studies and “high theory” political science (Druckman et al. 2011).

If the EANRS membership is taken as a representative “snapshot” of academics engaged in the field of Romani studies, as evidenced in the document mapping the membership of the network (EANRS 2013: 2), a substantial proportion of members have engaged in the provision of policy advice to national or international agencies, or undertaken expert review of policy documents pertaining to Roma minorities. Accordingly, it can be seen that despite the expertise that can accrue through practice and close engagement with Roma populations, there is something of a mismatch between members’ policy-related activities and their professional orientation and training. It is therefore likely that those academics who work most closely with Roma minorities and who are deeply committed to their wellbeing may have a lacuna in

specialist training or expert knowledge in relation to policy-making processes and cycles, which may potentially hamper the effective delivery of policy advice (Cairney 2015).

Given the preponderance of certain disciplines among EANRS members, the majority of Roma “specialists” or those undertaking doctoral training with a focus on Romani studies are less likely than “practitioners” to be required to actively and theoretically engage with issues of both coproduction (as expounded by Ryder 2015) or the “nuts and bolts” of policy development, until they find themselves working in the field of policy review, or employed to undertake research on behalf of agencies seeking to identify the support needs of marginalized Roma populations. In contrast (and, it can be argued, better fitting such professionals for the role of academic-activist), issues of the complex interplay of community empowerment, coproduction of research, and the practical implications of influencing and implementing policy enactments have been explored over several decades, and in some depth, in relation to professional practice among a number of public service-oriented disciplines. Social workers (Reeser and Epstein 1990; Gray and Webb 2009), teachers (Giroux 1991; Sachs 2000) and health professionals (Holter and Schwartz-Barcott 1993; Warner 2003; Laverack 2012) are thus all able to draw on a body of literature and practice that engages with the above germane issues.

While such outcome-focused (as opposed to research-oriented) models have only relatively recently been identified as pertinent to more “traditional” academic disciplines (as opposed to applied, translational health and social sciences), geographers and anthropologists have been at the forefront of much of the cutting-edge critical debate on the importance of embedding principles of social justice into field research. This is perhaps unsurprising, given their disciplinary emphasis on reflexive practice and frequently close, microlevel, embedded working relationships with communities (Beck 2001; Hale 2006; Kingsolver 2009; Watt 2010;

Rogaly 2015). Indeed, as early as 1996, the geographer Paul Routledge drew on the work of postcolonialist theorist Homi Bhabha (1994) to reflect upon the notion of a liminal politicized “third space” in which “no simple opposition exists between academia and activism. Rather, occupying a third space of critical engagement enables research to become a personal and reflexive project of resistance” (Routledge 1996: 411).

Given the academic disciplines most common to the “older generation” of Romani studies scholars, a slender but persistent thread of postcolonial social theory and radical anthropology has (albeit controversially) influenced Romani studies since the late 1970s (see Ryder 2015 for an excellent critical review of the tensions between proponents of “scientism” and “activism/standpoint theory,” and also Ryder, this volume). More recently, with the emphasis within EU policy documents—most specifically in relation to national Roma integration strategies (NRIS) and the EU Framework—on “partnership” activities and coproduction of outputs, including monitoring reports by academics, civil society organizations, and Roma peoples, discourse on community development and activism has attained significant prominence across a wider range of fields. Thus, the plethora of opportunities that in the last decade have opened up for academics (of both Roma and non-Roma ethnicities) to work with and be influenced by (and in turn to influence) Roma activists means that the terrain and discourse of “expertise” has rightly shifted. Accordingly, evaluations of findings and recommendations presented to agencies charged with policy development, at both EU and nation-state level, typically and correctly require evidence of consultation and coproduction in order to be granted credence.

While the question of just how meaningful such collaborative research techniques may be (or whether mere “lip service” has been paid to the community or to practice-derived knowledge

of nonacademic partners) is beyond the scope of this chapter, it is critically important to note that even in circumstances where impeccable attention has been paid to participatory research methods and the “voice” of hitherto marginalized populations is clearly presented in outputs, there is a very real danger that reports will languish on the shelf. Similarly, recommendations may often fail to win approval as a result of the authors’ lack of knowledge of the realities of the policy-making terrain and the constraints under which bureaucrats must labor. This would ultimately nullify the efforts of engaged researchers to concretely make a difference in the lives of the communities they work with, and would relegate research back to its ivory tower.

While there is an accepted recognition of the value and necessity of academics “becoming inexpert”—recognizing the limitations of their own world-view and drawing upon the lived community experience and expertise of Roma populations to coproduce data (see further Ryder et al. 2014; Lane et al. 2014), it can be argued that these specialist knowledge producers on Roma matters frequently misunderstand (and hence misrepresent) the processes involved in the craft of policy-making (Cairney 2015). Predominantly this occurs when academics fail to recognize the critical importance of theoretical and practical models inherent in, and fundamental to, the design of policy activities. Particular gaps in understanding between academics and policy makers arise from limited awareness by academics and activists of the type of information required to support policy, how such information should be packaged, and the appropriate timing of input. In turn, policy makers are frequently dismissive of abstract theoretical argument and terminology that appears irrelevant to the case in question (Marble 2006: 3). It can be credibly argued that the “three legs” of the tripod that supports Roma inclusion are empowerment (“voice”), high quality research and data to support moral and practical arguments for change, and appropriate policy design. However, in order to create a

stable structure, it is critically important for activist-academics to have a solid knowledge of how to translate research into policy outcomes (Goldstein 2009) that are protected from misapplication or poor implementation leading to unintentional harm.

<HDA>Bridging the Gap between Academics, Activists, and Policy Makers

<FL>In the special edition of *Asia Policy* published in 2006, which was devoted to a consideration of how best academics could be supported in delivering policy-relevant outputs, contributors (Goldman 2006; Marble 2006; Vogel 2006) highlighted a number of excellent practice points. These essays on influencing policy design and outputs are as highly relevant to readers of this chapter as to the initial target audience, even if they do not specifically focus on Roma. Key elements flagged by authors concerned the necessity of understanding common policy dilemmas, being familiar with upcoming timetables, and foreseeing (so far as possible) crisis events that might have an impact on decision-making. Contributors to the volume consistently noted that recommendations must engage in a practical sense with such multifactorial issues. For instance, pertinent critiques that are phrased in terms that may be perceived as offering too great a criticism of the administrative regime's actions were flagged as likely to lead policy makers to reject recommendations. It might well be added that so does a cavalier disregard for the circumstances facing frequently overburdened policy professionals, a point highlighted by Cairney (2015: 9), who proposes that academics "should identify how the policy process works and seek to influence it on that basis—not according to how they would like it to be."

In the volume of *Asia Policy* referred to above, Goldman (2006: 20) recommends that academics should consider the use of case studies, problem-solving exercises, and simulations as

tools for training students (and indeed activists) in policy design, noting that these techniques are used widely in professional policy training. As considered earlier in this chapter, certain professionals—such as lawyers, social workers, and medics—who are familiar with “on the ground” work are frequently acutely alert to both policy impacts on, and implications for, their practice. In part, this relates to both their practical activities and close engagement with “end users,” but also perhaps to the fact that such methods form a core part of their training, as well as that of policy-professionals who have undertaken a formal course of study in their chosen discipline.

To support this argument, I provide an example of the effective use of case studies drawn from my own research and teaching. Feedback from participants and co-teachers in this program (“professionals” and “community members”) all indicated that the methods utilized had been influential in changing their awareness, practice, and modes of policy input and collaboration. A cohort of public health students (master’s degree level with feed-in pathway to M.Phil./Ph.D.), comprising policy staff and front-line practitioners working at both grassroots and strategic levels, took modules that I developed and co-delivered on the policy-making process. Students were overwhelmingly experienced practitioners, who in their professional lives were responsible for developing health commissioning and implementation policies, as well as—in some cases—delivering services.

In addition to standard “academic-led” sessions (for example on theoretical models and intervention cycles that occur when making policy), the program included an element that consisted of taught sessions and practice-based exercises focused on the use of pathways and network mapping. This set of activities focused on how best to design service delivery for “underserved groups,” including Gypsies and Travellers, refugees and asylum seekers, and

homeless people. This program element undertaken near the end of the year-long policy-making module took place over two months and was assessed through a series of short activities. The activities subject to assessment precisely reflected those elements with which policy practitioners engage throughout their working lives—for example, the production (and critique) of written policy justifications (including reflection on cost implications), network-development exercises (who to engage with, how to operationalize a network, and for what purpose), and the production of process-mapping papers. In addition, students were tasked with practical problem-solving exercises based on review and interrogation of data sets and policy options, and produced and made presentations to colleagues and examiners on selected themes.

Participants in the course were also supported in undertaking meetings with community groups led by Gypsy and Traveller (and homeless) activists, and experienced sessions led by health professionals working with the “underserved groups.” These meetings enabled them to consider how best to ensure that policy was tailored to build in delivery flexibility such as might be required “on the ground” when working with groups experiencing particular challenges and rapid change in their circumstances. Sessions were also delivered on practical policy-making and policy interventions in which vignettes using anonymized “real life” policy and practice situations were embedded into the module. In addition, guest speakers from the communities took part in seminars (in some cases introduced as community members, and in other cases anonymized, so that their input was engaged with prior to their “outing” themselves as Gypsy or Traveller activists once concerns over practice, stereotypical perceptions, and policy barriers had been discussed). Mutual sharing of understanding and knowledge thus took place in a respectful environment. In this way, we turned the model of typical policy analysis and engagement upside down, consciously creating a sense of disorientation and demonstrating that expertise is best

created from coproduction and sharing of knowledge and experience. Participants whose professional roles required them to actively design and implement health policy, outreach, and delivery of services were thus exposed to a 360-degree review of policy formation, implementation, and impact on service recipients. These learning experiences then had to be packaged as though for presentation to their employers, with the presentation subsequently subject to in-depth analysis and challenge in classroom settings by a range of audiences.

Based on my experiences, I would assert (as also noted by Goldman 2006) that awareness of practice-based approaches to critical thinking, requiring reflexive review of presumptions and practical engagement with policy tools, can make students and academics better producers of policy outputs. To this, it is worth adding that awareness of the potential for conjunctions of knowledge (i.e., gained from nonacademic or policy professionals) and alertness to key opportunities for engagement with “irregular” syndromes of policy-making (Rockman 1981) may be equally important in terms of influencing recommendations and outcomes.⁴

<HDA>The Unintended Consequences of Overthinking

<FL>As the above review of the academic specialisms of Romani Studies scholars from the EANRS has shown, academic researchers whose work is drawn upon to underpin policy development that impacts Roma populations come from a wide range of disciplines, but few are practitioners or policy specialists. As such, their traditional academic training will typically have omitted to engage with such methods as are proposed by experienced policy professionals and considered by Goldman (2006) and Rockman (1981). Further, academic expertise (often a narrow but deep focus) may mean that those academic-activists making recommendations do not routinely undertake a 360-degree scan of contemporary politics, day-to-day circumstances of end

users, and current affairs, obscuring surrounding trends or potential opportunities for rapid, low-cost interventions.

This latter, often overlooked, category (“off-the-shelf,” transferable practice) may quite ethically be subject to effective wholesale policy transfer as appropriate, or reworked at various phases of the policy cycle, using existing tools and techniques (see Dolowitz 2010 on “stored knowledge”), such as are commonly preferred by policy makers (see the “punctuated equilibrium theory,” Baumgartner and Jones 1993:1-19; 285-290).⁵ Crucially, there is now a distinct trend toward a “new space of politics” impacting policy formation, to the extent that Hajer and Wagenaar (2003: 8) suggest that “concrete challenges to the practices of policy-making and politics [are emerging] from below.” This “new space” is leading to expanded networks of policy influence, and greater scope for interpretation and the development of bottom-up narratives, which in turn permits engagement with the values and belief systems of those most impacted by enactments.

In itself, this apparent democratization of policy inputs must be seen as positive and offering valuable scope for the researcher to work closely with activists to craft a narrative that impacts policy formation. However, care must always be taken to ensure that the implications of greater “openness” are benign and not driven or overborne by factional concerns or “hobbyhorses” of more vocal or articulate proponents of a single view—circumstances that might lead to unforeseen negative consequences for the group concerned.

To give but one example, in the academic year 2014–15, on two separate mailing lists, one academic and one activist, intense and at times heated debates took place on the nature and precise formulation of the term “Roma,” and who should be included within policy formulations such as the NRIS. These fascinating discussions focused (among other themes) on presumptions

of “elective choice” of identity versus externally (or group-internal) imposed recognition; whether or not there was a necessity for a distinct Roma policy and if so, whether only individuals who were “Roma” (rather than of Traveller heritage) should be incorporated in enactments. A significant number of academic and activist commentators on both threads held academically precise but highly polarized views on the situation, cultures, and future direction of people from Roma and Irish Traveller populations.⁶

In the United Kingdom, although the full implications of this example are outside this chapter’s focus, it was noted by a number of activists that Irish Travellers, while culturally distinct from Roma people, often find themselves closer in many ways to Romany Gypsies (who typically state a preference to living in culturally appropriate “caravan” accommodation and who are often highly resistant to house-dwelling and “assimilation”) than they do to (migrant) Roma, who overwhelmingly seek a multicultural, rights-based recognition of their identity and ethnicity, but within a sedentarized context.

While for the academic or Roma activist the differences between the communities are self-evident, stark, and debated in full awareness of the exclusion and discrimination faced by “Roma,” the policy practitioner is less concerned with the ethnicity and history of Travellers, Romany Gypsies, and Roma. The policy professional working within the context of government (and hence engaged with many diverse communities) will typically seek merely to create a category that provides protection for people subject to marginalization and racism, and who in the popular mind and discourse are all part of the same group of “nomads.” While in the online forums it was debated whether creating a “convenience” policy category that incorporated nomadic Romany Gypsies, Travellers, and sedentarized Roma was scientifically pertinent, the concern of policy-alert commentators lay elsewhere.

This latter group argued that tampering with existing categories—which, while perhaps anthropologically, linguistically, or ethnically make little sense, nevertheless “work” in policy practice—potentially worsened the plight of many of the people currently contained within the rubric of “Roma,” who share a status of marginalization associated with perceptions of nomadism and racist “othering,” contaminated with arguments pertaining to the “cultures of poverty” narrative. This one small example, if carried to the logical conclusion of subdividing the groups to the extent that some would be “in” and others “out” of policy protection, would potentially overturn legislative “wins”—for example, the recognition in the United Kingdom of Irish and Scottish Travellers, as well as Romany Gypsies, as ethnic minorities with a right, in certain circumstances, to dwell in caravans and on “Gypsy/Traveller sites.”

Moreover, such fragmentation of definitions could also offer succor to right wing or regressive political and media elements, determined to emphasize that long-established cultural practices held by all three “groups” are merely “lifestyle choice” and thus should not be afforded the dignity of policy protection. Accordingly, there are many pitfalls to the presentation of theoretical (and in such contexts highly relevant) debates, which can be confusing for the influential concept broker not fully au fait with the heightened passions afforded by what can, to the outsider, appear to be relatively irrelevant concerns. Similarly, a danger exists that the policy maker may be misled into believing that differences of opinion or an insistence on discrete scientific classifications equates to a lack of concern for social justice issues, or demonstrates a broad failure of consensus on anti-oppressive or antiracist action.

Exposing such complex minutiae of the academic and activist gaze to the public (political) observer or policy end user can thus have significant unintended negative consequences. Indeed such debates may, if only partially understood by the policy community,

influence policy design or lead to refinements of targeted intervention in a manner frequently (and dangerously) outside the awareness of those researchers whose work directly feeds into outputs that impact the daily lives of millions of Roma and Traveller people. Moreover, Cohen et al. (2007) highlight that a dilemma often exists in terms of engaging with policy. Enactments and guidance are created with the best possible intentions: to alleviate a perceived problem identified by researchers and policy makers. However, front-line practitioners may then be placed under increased pressure (leading to a disengaged tick-box mentality in daily practice) as the instruments designed to encourage implementation are often imposed on staff whose capacity to challenge top-down expectations—or their own weak political position—means that they are required to deliver target-driven outcomes, regardless of potentially negative impacts on communities receiving services.

Accordingly, the effective realization of policy depends in practice on the fit between resources and the capacity and capabilities of those charged with delivering “change.” The more the aims substantially outstrip capabilities, the less likely is the chance that implementation will take place successfully. As such, yet another danger exists for the unwary academic-activist: that of attempting to create a utopian policy, or one that is beyond the reach of those on the “front line” of service implementation and delivery. Inevitably in such cases, an inability of staff to effectively undertake mandated tasks will lead to a culture of mistrust, avoidance, and resentment. Then policy activities targeted at improving lives may be regarded by overworked practitioners as merely an administrative burden: something to be fulfilled to the minimal standard or avoided as much as possible.

<HDA>Conclusion

<FL>While this contribution offers a whistle-stop tour of the interaction between policy-making and research, as a former legal practitioner turned policy officer (prior to becoming an academic), I feel able to comment with some confidence on the distinct approaches and needs of the policy specialist, concluding this chapter by suggesting certain factors that need to be borne in mind by the activist-academic engaged in policy advice. One element that is often disregarded or misunderstood by activists and academics alike is the sheer pressures of time on policy professionals and their inability to own specialist knowledge across a broad range of areas. This role limitation impacts not only the daily role of the policy maker, but also the processes of data selection, as well as the purposes to which research or activist briefings are subject. Vogel (2006: 31–32), referring to the “luxury of academia,” notes that policy makers are constantly under pressure to hold several portfolios of knowledge, often expected to respond (or preempt) the next emergent “crisis” or topic area, and typically have limited windows of opportunity to engage with a range of materials. As such, selection of data used to support policy development and decision-making will be subject to a degree of randomness.

Ginsburg and Gorostiaga (2001: 174–75) highlight that research can be used by policy makers in the following ways: instrumentally, to solve problems; interactively, essentially as one element combined with practice experiences; and/or to add enlightenment to shape general thinking. Further, research can function politically, to selectively provide support to predetermined actions; it may serve a tactical purpose, where policy practitioners use research to enhance their credibility or justify their nonactions; or it may be used promotionally, to disseminate and promote the implementation of policy decisions to individuals not actively involved in policy-making processes. As such, it can be seen that the complex ways in which data is used, the number of “network” members, the influences that variously foreground the

voices of particular individuals or groups under the rubric of democratization—coupled with the intense pressures under which policy practitioners are placed to devise effective outcomes that still offer flexibility for responsive amendment (Weible et al. 2012)—all hold the potential for a toxic situation to develop. Accordingly, when mishandled, the group dynamics and politics associated with using research to influence policy design has the potential to lead to sclerotic turpitude and a desperate worsening of the situation of vulnerable groups.

Given that the selection of key policy themes and targets to measure and evaluate member state responsibilities toward national Roma minorities and other vulnerable or migrant populations are overwhelmingly formulated in response to research findings at both the national and EU level, it is imperative that both activists and academics remain supraconscious of the ethical weight of their activities, pronouncements, and recommendations to policy makers. While “impact assessments” are carried out prior to the implementation or adoption of policy and legislation at the EU level, inevitably these *also* are dependent upon the state of knowledge available to those undertaking the impact assessment and the quality of responses received from civil society and other agencies.⁷ Accordingly, at all stages of the process of policy formation and implementation, the validity of research findings and the research teams’ underlying philosophy, paradigmatic approach, and quality of relationship with “grassroots” civil society are all key (but typically unremarked) elements that feed into policy frameworks and the policy-making process. I have expounded elsewhere upon the symbiotic relationship between effective policy development, Roma empowerment, and ethical research predicated upon knowledge-sharing between Roma communities, policy makers, academics, and activists (Greenfields 2015). It is, however, worthwhile reiterating that for all those engaged in such a project, our collective priority must be to ensure that policy is based firmly upon the highest quality, most credible, and

unbiased research evidence, supported by knowledgeable policy advice. When activists (both Roma and non-Roma), academics, and policy makers can base thoughtful, practical, and “deliverable” recommendations on incontrovertible substantive evidence, it is to be hoped that we will be able to identify (and ethically use) the tools that empower and deliver the greatest positive impact on the lives of those whose wellbeing may at least partially lie in our hands.

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References**

- Adams, Robert. 2002. *Social Policy for Social Work*. Basingstoke: Palgrave Macmillan.
- Arnstein, Sherry R. 1969. “A Ladder of Citizen Participation.” *Journal of the American Planning Association* 35 (4): 216–24.
- Baumgartner Frank R., and Bryan D. Jones. 1993. *Agendas and Instability in American Politics*. Chicago: University of Chicago Press.
- Beck, Sam. 2001. “Radicalizing Anthropology?” *Anthropology of Work Review* 22: 1–6.
- Bhabha Homi. 1994. *The Location of Culture*. London: Routledge.

- Cairney, Paul. 2015. *The Politics of Evidence-Based Policymaking*. Basingstoke: Palgrave Pivot.
- Cohen, David K., Susan L. Moffitt, and Simona Goldin. 2007. "Policy and Practice: The Dilemma." *American Journal of Education* 113 (4): 515–48.
- Commissioner for Human Rights. 2012. *Human Rights of Roma and Travellers in Europe*. Strasbourg Cedex: Council of Europe Publications. Accessed 13 September 2015.
http://www.coe.int/t/commissioner/source/prems/prems79611_GBR_CouvHumanRightsOfRoma_WEB.pdf.
- Dolowitz, David. 2010. "Learning, Information and Policy Transfer Process: What Do Governments Learn When Shopping for Ideas." Paper presented at the Royal Society of Edinburgh seminar on Policy Learning and Policy Transfer in Multilevel Systems, Scottish Policy Innovation Forum and University of Aberdeen, Edinburgh, 22 January 2010.
- Druckman, James N., Donald P. Green, James H. Kuklinski, and Arthur Lupia, eds. 2011. *Cambridge Handbook of Experimental Political Science*. New York: Cambridge University Press.
- European Academic Network for Romani Studies. 2013. "Mapping the Network and Presenting Its Potentials." EU and Council of Europe. Accessed 3 August 2015.
http://romanistudies.eu/wp-content/uploads/2015/02/mapping_Romani_Studies_network_sept2013.pdf
- European Commission. 2011a. "An EU framework for National Roma Integration Strategies up to 2020." COM(2011)173. Accessed 3 August 2015.
https://ec.europa.eu/info/strategy/justice-and-fundamental-rights/discrimination/roma-and-eu/roma-integration-eu-countries_en#nationalromaintegrationstrategies.

- . 2011b. *Working Together for Roma Inclusion*. Luxembourg: Publications Office of the European Union. Accessed 30 April 2018.
<http://romani.humanities.manchester.ac.uk/virtuallibrary/librarydb/web/files/pdfs/190/VL-105.pdf>
- . 2012. “Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions: National Roma Integration Strategies: A First Step in the Implementation of the EU Framework.” COM(2012)260. Accessed 30 April 2018.
<https://publications.europa.eu/en/publication-detail/-/publication/3b9bfed7-c6b5-4713-89f0-e1465ae16ac3>
- . 2015. “Better Regulation Guidelines.” Commission Staff Working Document. Accessed 1 October 2016. http://ec.europa.eu/smart-regulation/guidelines/docs/swd_br_guidelines_en.pdf.
- European Roma Policy Coalition. 2012. *Analysis of the National Roma Integration Strategies*. N.p.: European Roma Policy Coalition.
- European Roma Rights Centre. 2013. “National Roma Integration Strategies: What Next?” Special issue, *Roma Rights: Journal of the European Roma Rights Centre*.
- Feffer, John. 2013. “The Failure of Funding Roma Inclusion.” *Foreign Policy in Focus*, 28 January 2013. Accessed 13 June 2016.
http://fpif.org/the_failure_of_funding_roma_inclusion/.
- Flood, Michael G., Brian Martin, and Tanja Dreher. 2013. “Combining Academia and Activism” *Australian Universities Review* 55 (1): 17–26.

- Fontanella-Khan, James, and Eddy Kester. 2014. "Roma: Moving Target." *The Financial Times*, 25 February 2014. Accessed 15 June 2014. <http://www.ft.com/cms/s/2/27e2aa22-995f-11e3-91cd-00144feab7de.html#axzz3kgY8jj95>.
- Gaudreau, Matthew, and Marc Saner. 2014. "Researchers Are from Mars; Policymakers Are from Venus." Policy Brief Series: Science/Policy Interface no. 1. Institute for Science, Society and Policy. Accessed 10 June 2016. <http://issp.uottawa.ca/sites/issp.uottawa.ca/files/issp2014-spibrief1-collaboration.pdf>.
- Ginsburg, Mark B., and Jorge Gorostiaga. 2001. "Relationships between Theorists/Researchers and Policy Makers/Practitioners." *Comparative Education Review* 45 (2): 173–96.
- Giroux, Henry. 1991. *Border Crossings*. New York: Routledge.
- Goldman, Emily O. 2006. "Closing the Gap." *Asia Policy* 1 (1): 16–24.
- Goldstein, Harold. 2009. "Translating Research into Public Policy." *Journal of Public Health Policy* 30 (Supplement 1: *Connecting Active Living Research to Policy Solutions*): s16–s20.
- Gray, Mel, and Stephen A. Webb. 2009. "The Return of the Political in Social Work." *International Journal of Social Welfare* 18: 111–15.
- Greenfields, Margaret. 2015. "Policies for Roma Inclusion." Opening Statement: Showcase Event, Strasbourg, 22 April 2015.
- Guy, Will. 2012. "Roma Inclusion at the Crossroads" *Roma Rights: Journal of the European Roma Rights Centre* 5. Accessed 3 September 2015. <http://www.errc.org/article/roma-rights-2011-funding-roma-rights-challenges-and-prospects/4062/1>.
- Hajer, Maarten A., and Hendrik Wagenaar, eds. 2003. *Deliberative Policy Analysis*. Cambridge: Cambridge University Press.

- Hale, Charles R. 2006. "Activist Research v. Cultural Critique." *Cultural Anthropology* 21 (1): 96–120.
- Holter, Inger M., and Donna Schwartz-Barcott. 1993. "Action Research." *Journal of Advanced Nursing* 128: 298–304.
- Kingsolver, Anne E. 2009. "Learning from Activist Anthropologists' Praxis." *New Proposals: Journal of Marxism and Interdisciplinary Inquiry* 2 (2): 73–77.
- Lane, Pauline, Siobhan Spencer, and Adrian Jones. 2014. *Gypsy, Traveller and Roma: Experts by Experience: Reviewing UK Progress on the European Union Framework for National Roma Integration Strategies*. Cambridge: Anglia Ruskin University. Accessed 1 October 2016. <https://www.birmingham.ac.uk/Documents/college-social-sciences/social-policy/iris/2014/Experts-by-Experience--JRTF-Report-Oct-2014.pdf>.
- Laverack, Glenn. 2012. "Health Activism." *Health Promotion International* 27 (4): 429–34.
- Marble, Andrew D. 2006. "Bridging the Gap with Market Driven Knowledge." *Asia Policy* 1 (1): 2–6.
- Marsh, David, and Allan McConnell. 2010. "Towards a Framework for Establishing Policy Success." *Public Administration* 88 (2): 564–83.
- Martin, Brian. 2007. "Activism, Social and Political." In *Encyclopedia of Activism and Social Justice*, edited by Garry L. Andersen and Kathryn G. Herr. 19-27 London: Sage
- Moisă, Florin, Daniela Tarnovschi, Ivan Claudiu, Adrian Marin, Diana Lăcătuș, and Radu Lăcătuș. 2016. *Strategies–YES, Funding–NO: Financing Mechanisms for Roma Public Policies in Romania*. Cluj Napoca: Resource Center for Roma Communities.
- Okely, Judith. 1983. *The Traveller-Gypsies*. Cambridge: Cambridge University Press.

- Powell, Ryan. 2011. "Gypsy-Travellers and Welfare Professional Discourse." *Antipode* 43 (2): 471–93.
- Reeser, Linda C., and Irwin Epstein. 1990. *Professionalization and Activism in Social Work*. New York: Columbia University Press.
- Rockman, Bert A. 1981. "America's Departments of State: Irregular and Regular Syndromes of Policy Making." *The American Political Science Review* 75 (4): 911–27.
- Rogaly, Ben. 2015. "Disrupting Migration Stories." *Environment and Planning D: Society and Space* 33 (3): 528–44.
- Routledge, Paul. 1996. "The Third Space as Critical Engagement." *Antipode* 28 (4): 399–419.
- Ryder, Andrew, Sarah Cemlyn, and Thomas Acton, eds. 2014. *Hearing the Voice of Gypsies, Roma and Travellers*. Bristol: Policy Press.
- Ryder, Andrew. 2015. "Co-producing Knowledge with Below the Radar Communities: Factionalism, Commodification or Partnership? A Gypsy, Roma and Traveller Case Study." Third Sector Research Centre Working Paper, Discussion Paper G, University of Birmingham. Accessed 26 August 2016.
<http://www.birmingham.ac.uk/generic/tsrc/documents/tsrc/discussion-papers/2015/gtr-discussion-paper-g-ryder-28janfinal.pdf>.
- Sabatier, Paul A., and Weible Christopher M., eds. 2014. *Theories of the Policy Process*. 3rd ed. Chicago: Westview Press.
- Sachs, Judyth. 2000. "The Activist Professional." *Journal of Educational Change* 1 (1): 77–94.
- Social Care Institute for Excellence. 2012. *Towards Co-production: Taking Participation to the Next Level*. SCIE Report 53. London: Social Care Institute for Excellence.
- Spicker, Paul. 2014. *Social Policy*. Bristol: Policy Press.

- Surdu, Mihai, and Martin Kovats. 2015. "Roma Identity as an Expert-Political Construction." *Social Inclusion* 3 (5): 5–18.
- van Baar, Huub. 2005. "Romany Counter-Governmentality through Transnational Networking." Conference paper, Oxford Symposium on (Trans-) Nationalism in South East Europe, St. Antony's College, University of Oxford, UK, 17–19 June 2005.
- . 2011. "Europe's Romaphobia." *Environment and Planning D: Society and Space* 29 (2): 203–12.
- . 2012. "Socio-Economic Mobility and Neoliberal Governmentality in Post-Socialist Europe." *Journal of Ethnic and Migration Studies* 38 (8): 1289–304.
- Vogel, Ezra F. 2006. "Some Reflections on Policy and Academics." *Asia Policy* 1 (1): 31–41.
- Warner, Joanne R. 2003. "A Phenomenological Approach to Political Competence" *Policy, Politics, and Nursing Practice* 4 (2): 135–43.
- Watt, Paul. 2010. "Unravelling the Narratives and Politics of Belonging to Place." *Housing, Theory and Society* 27 (2): 153–59.
- Weible, Christopher M., Tanya Heikkila, Peter deLeon, and Paul A. Sabatier. 2012. "Understanding and Influencing the Policy Process." *Policy Sciences* 45 (1): 1–21.

<HDA>Notes

1. Classified as manipulative or therapeutic engagement, in which the objective is less to enable community members to participate in planning or to actively collaborate in projects than to provide scope for those who hold power to "educate," or provide a therapeutic context in which those impacted by decisions can vocalize their concerns.

2. It is perhaps worth stating that outputs should by definition pass the first hurdle of fulfilling the basic standards for policy guidance—i.e., that they preclude bias enabling core or obvious issues to be dismissed in the interests of the authors’ political stance. Moreover, they must not fail to engage with adequate and transparent arguments to justify a particular recommendation. In this way, potentially conflicting views can be presented, analyzed, and explored prior to recommendations being made that both satisfy the activist-academic’s commitment to social justice and are fully supported, justifiable, and “deliverable.”

3. Implemented via such mechanisms as the Decade of Roma Inclusion 2005–15 and the EU Framework for National Roma Integration Strategies up to 2020. Supporting documentation, case studies, and activities initiated and undertaken by the twelve member states participating in the Decade can be accessed by undertaking a country-by-country search. In addition, some regional initiatives (Roma Integration 2020; Regional Cooperation Councils) have been developed following the end of the Decade of Roma Inclusion (see, for example, “Documents,” Roma Integration 2010: Regional Cooperation Council website, accessed 27 November 2017, http://www.rcc.int/romaintegration2020/docs_archive?search_type=3). The EU Framework for National Roma Integration Strategies (NRIS) is a policy framework that was strongly influenced by the underpinning activities of the Roma Decade of Inclusion and was adopted by European member states (MS) on 5 April 2011 (European Commission, 2011a and 2011b). Under the Framework, each member state was required to deliver an integration strategy pertinent to the circumstances of its Roma populations by the end of 2011, a deadline missed by a significant number. The Framework and resultant NRIS have been subject to widespread significant criticism for failing to deliver change (ERRC 2013), as illustrated by the monitoring reports required from each member state on a regular basis. Civil society monitoring documents

pertaining to national reports were formerly lodged at a single website location hosted by the Decade of Roma Inclusion website, but since the ending of the Decade initiative these monitoring reports must now be accessed on a country-by-country basis. One core criticism leveled at the NRIS and associated outputs concerns the fact that individual MS have been permitted to adopt or develop policies that often failed to address pressing issues, even though they were aimed at ensuring that Roma (and members of other communities included within this rubric—e.g., Travellers, Sinti, Manouche, etc.) have equal access to employment, education, healthcare, and housing (including essential services) (ERRC 2013). Instead, they merely highlight limited ongoing activities that have been criticized by civil society “on the ground” as inadequate, poorly funded, or cost-neutral to the state in question, despite the availability of EU funding to support new initiatives. NRIS, as prepared and submitted by MS, have been identified as typically inadequate in scope (European Roma Policy Coalition 2012), while protective activities or strategies for inclusion have been frequently found to be lacking enforcement processes or adequate development. Indeed, NRIS often merely reiterate policies in place prior to the implementation of the Framework (see further European Commission 2012). Other commentaries suggest that, in practice, “new” outputs emerging from adopted strategies have tended to concentrate funding in the hands of NGOs or agencies that may be inexperienced in working with Roma. Concerns have also been articulated that agencies are subject to claims of corruption (see further Feffer 2013; Fontanella-Khan and Eddy 2014), with activities typically benefiting only a small (often elite) proportion of the population in need. In any event, progress has been slow, resources have typically been available on a short-term basis, there is lack of sustainability, and many NRIS activities have been found to make very little difference to the

daily lives of marginalized Roma populations (Commissioner for Human Rights 2012; Guy 2012; Moisă et al. 2016).

4. Rockman (1981), in an astute “insider” review of the processes of policy-making in the U.S. and European institutions, reviews the role of noncareer, “irregular” special advisors or experts in a particular field, who are external to traditional ministerial or departmental roles. These advisors, selected for their in-depth knowledge of a particular field or set of networks, but typically not engaged on a career basis with the “nuts and bolts” of direct policy implementation and design, may work closely with lawmakers and politicians; as a result, particular expert knowledge or approaches may become embedded in the knowledge of decision makers, leading to the opportunity to influence outcome-focused policy design. In this way, Rockman (1981: 913) notes the advantages of impact enjoyed by “irregulars,” resulting from their detachment from operational responsibilities and the more “entrepreneurial” or “ideologically” driven approach that can appeal to lawmakers and politicians.

5. Punctuated equilibrium theory posits that political systems can be both dynamic and stable. While the majority of policies may remain stable for relatively lengthy periods of time, they can also shift dramatically, typically in reaction to the election of a new government wedded to a particular form of ideology, or triggered by an apparent crisis that focuses political or public attention on a subject, leading to urgent attempts to implement new forms of policy response. When this occurs, professional policy makers—under pressure to deliver a solution in a short time frame—will typically rely on prior learning or methods with which they are familiar.

6. In the context of this debate, the Roma are identified as those with historically Indic origins, thus including— in European Policy Centre terms—U.K. Romany Gypsy groups, but excluding other “Traveller” groups. However, in U.K. terminology, “Roma” is used only to designate

European migrants with Indic origins, while British-born Romani populations will overwhelmingly use the term “Romany Gypsy,” “English Gypsy,” or “Romany” to describe themselves, a practice followed in British policy documents.

7. See further “Impact Assessments,” European Commission website, accessed 27 October 2017, http://ec.europa.eu/smart-regulation/impact/index_en.htm; and, explaining the processes undertaken prior to adoption and implements of policy, “Better Regulation: Guidelines and Toolbox,” European Commission website, accessed 27 October 2017, http://ec.europa.eu/smart-regulation/guidelines/toc_guide_en.htm.