THE ROYAL SOCIETY

GUIDELINES 2000

1 The Royal Society welcomes the chance to comment on the revised guidelines on the use of scientific advice in policy making. In the three years since the guidelines were first issued, it has become all the more important to get the interaction between science and politics right. Public policy issues that have a scientific component can be very controversial, with both the science and its interplay with the non-scientific components being subjected to intense scrutiny.

2 The list of organisations responding to the preliminary consultation earlier this year suggests that the guidelines have been widely disseminated. However, there are indications that the guidelines have not penetrated as far as we would wish: not all advisory bodies, let alone the recipients of the advice, appear to be familiar with them. And the track record in publishing advice received (especially in-house advice, as required by paragraph 4 of the revised guidelines) and in explaining what use was made of it has been patchy. OST must keep up the pressure to have the guidelines implemented across Government.

3 Early anticipation of the need for advice (paragraph 5) is vital; it can also be very difficult, since problems can develop quickly. One prerequisite is for both policy makers and advisers to be in touch with a wide range of contacts, so as to increase their chances of picking early warning signals. For example, Departmental scientific groups must be in close and frequent touch with their counterparts in the wider national and international scientific community. The proposals in paragraph 7 (d) are therefore important.

4 The requirements for credibility and independence (paragraphs 12 - 15) are, in practice, not straightforward. First, it is becoming less and less feasible to rely on experts who have no stake in the subject of their expertise. All organisations have objectives and values that guide their activities, and most recognised experts are recognised precisely by being employed by organisations seeking to exploit their expertise. Indeed, successive Governments have gone to great lengths to encourage expert academics to develop links with industry.

5 Second, in recent controversies we have seen sustained efforts by some of those involved to marginalise experts with one set of connections (eg with industry) but to promote those with another set of connections (eg with campaigning organisations). This has greatly distorted the balance of the discussion. Too often now we see opponents dismissing the advice of an expert on grounds of the expert's apparent self-interest, without going to the trouble of working out whether the advice is, in fact, sound: attention is focused on the messenger rather than the message. This is inevitable up to a point, but then such a trend goes too far informed discussion and informed, evidence-based policy-making become difficult.

6 As the revised guidelines recognise, the key to credibility lies in (where possible) soliciting inputs from a wide range of groups and in being open about the process and the people involved. This amounts to a matter of accountability: both the policy-maker and the advisers have to be accountable - ultimately to the electorate - for the advice given and the use made of it. This applies also where time or other constraints mean that policy-makers have to rely solely on in-house advisers.

7 The public disclosure of declarations of interest (paragraph 15) could be a sensitive issue either way. OST should check whether the current Freedom of Information Bill could affect policy on this, and whether its implementation in its present form would facilitate or impede high quality scientific advice. [Indeed, the OST should look very carefully, and urgently, at the potential implications of the Freedom of Information Bill for many features of the current research system.] It would be useful to know under what circumstances OST would regard it as appropriate for a Department not to disclose declarations of interest.

8 Policy-makers have to know what they can expect from scientific advisers. There is much that science does not know - otherwise research would be redundant - and policy issues arise in areas of scientific ignorance as well as scientific knowledge. But the uncertainty and controversy that can characterise science at the limits of current knowledge do not mean that science has nothing to contribute or that all 'scientific' opinions are equally plausible. Although there will be cases where the science is unclear and experts agree only that further research is needed, established scientific knowledge will often be able to set boundaries to the uncertainty and thus provide a guide to action.

9 It is, of course, necessary to get the questions right (paragraphs 16 - 17). Consulting groups of concerned non-experts, where time permits, could certainly be informative in this context. It might highlight scientific issues that needed to be addressed; it might also usefully highlight the extent to which public perceptions of the subject were intermingled with non-scientific concerns and thus remind us that science advice was only one of several inputs to the decision- making process. However, it is not appropriate to ask scientific experts to accommodate social, political and other concerns in their advice (paragraph 20): that is the responsibility, and the skill, of the policy-maker.

10 The guidelines are no use if they are not used. Implementation and monitoring (paragraphs 30 - 32) are therefore critical. It might be instructive to carry out a survey among official advisory committees and their staffs to see just how well known and understood the guidelines are. The guidelines have proved a valuable initiative since they were first published, but more remains to be done to achieve a culture among policy-makers that promotes best use of scientific advice.

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