
NUDGE AND EVIDENCE BASED POLICY: FERTILE GROUND?

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Abstract:

Nudging is an approach to public policy development that changes the decision making environment to encourage citizens to make a particular choice. The approach has been eagerly adopted by administrations around the world, with some governments establishing dedicated units, or Behavioural Insights Teams, to advance the use of Nudges. One reason proposed for Nudge's use is that it supports evidence based policy. Nudging has positioned itself firmly in evidence based policy rhetoric. For example, Behavioural Insight Teams have emphasised and encouraged the use of Randomised Control Trials as the best way to determine the effectiveness of a policy, arguing they can be simple to implement, cost effective and save money for government in the long term. There is little empirical understanding on whether Nudge's association with evidence based policy rhetoric has contributed to its popularity. This research seeks to understand how nudge is understood in relation to the evidence based movement, from the perspective of those designing, developing and implementing nudge policies. This paper finds policy makers perceive an interconnected relationship between Nudging and evidence based policy, with each providing fertile ground for the growth of the other. Implications for scholarship and practice are discussed.

Key words

Nudge, Evidence Based Policy, Behavioural Insights, Policy workers

INTRODUCTION

Government administrations internationally are increasingly adopting a new governance tool, known commonly as ‘Nudging’. Nudges use principles from behavioural economics and psychology to structure the way a decision is presented to citizens so that a particular choice is more likely to be selected. Despite concerns over Nudges’ ethics and effectiveness (see (Bovens, 2008; Goodwin, 2012; Kusters & Van der Heijden, 2015), Nudges are increasingly used by governments throughout the world. They have been applied in areas from organ donation to energy use, public health to tax payment (Whitehead, Jones, Howell, Lilley, & Pykett, 2014).

Academics have proposed a range of reasons for Nudges’ popularity including; that it supports some governments’ objectives to be less intrusive in citizens lives (Marteau, Ogilvie, Roland, Suhrcke, & Kelly, 2011), Nudge aligns with governments’ rhetoric on the need for austerity (Stoker, 2012), it is a response to the 2008 financial crisis, widely seen as failure of regulation (Oliver, 2013) and it is driven by the increase in a number of socio-economic challenges facing government, including rising rates of obesity, personal debt and climate change (Jones, Pykett, & Whitehead, 2011).

Nudging may have become popular because of its relation to evidence based policy (Strassheim, Jung, & Korinek, 2015). The Evidence Based Policy (EBP) movement encourages the use of evidence to support policy making, and policy effectiveness (B. Head, 2010). Governments have also reported using Behavioural Insights as it supports its evidence based approach (The Behavioural Insights Unit, 2014) and Nudge is largely located in EBP, with an emphasis on using Randomised Control Trials (RCT)s to develop effective government. Nudge may have benefited from the momentum of the Evidence Base Policy movement, as it came to the fore in an era of policy makers looking at how best to implement and engage with evidence. Yet this relationship seems not to be so straightforward. Recent original research exploring the role of Nudges in public policy suggests a more complex, interwoven relationship.

Using interpretive research, this paper seeks to understand how policy makers perceive and understand Nudges in relation to EBP, and how the influence of one may be influencing the other. This research explores this relationship from the policy maker’s perspective. It asks: How has the EBP movement provided fertile ground for the rise of Nudge? Conversely, how might EBP have benefited from nudge proponents’ influence and enthusiasm for Nudging? Is Nudging changing the shape and acceptance of what is considered to be evidence? In exploring these questions, this paper contributes, to my knowledge, the first to use empirical research to investigate this topic.

This paper presents preliminary analysis from a three-year, multi stage research project. The aims of the research are to understand why government is using Nudge and Behavioural Insights and what this reflects on governance. This paper draws on illustrative examples from Australia. Australia provides an excellent case study for exploring this research as it was at the forefront of adopting the Nudge approach and has close ties to the original ‘Nudge Unit’ in the UK. Its intention, as a paper and presentation at the International Conference on Public Policy, is to spark debate and seek feedback on the concept and ideas

discussed. I therefore present this paper as a work in progress, and welcome constructive feedback to inform future stages of the research. Nonetheless, the interpretations of policy workers have been remarkably exempt from the Nudge literature, and the paper thus makes an important contribution to empirically informed scholarship. This paper adds to this scholarship by drawing attention to how Nudge, and its interpretation has influenced policy makers use and understanding of EBP and provides important insights on how Nudge is influencing policy makers' perspectives on what constitutes evidence. This paper hopes to add to both the literature and practice, by encouraging practitioners to critically reflect on rhetoric around EBP and Nudge, what it might mean for the design and development of policies, and how evidence is interpreted.

This paper proceeds by introducing the concept of Nudge and its rise in popularity in government internationally and in Australia. I then turn to government reports that provide an indication of how Nudge is seen formally by government, and how it is seen to sit with EBP, drawing on some of the key texts used and promoted by government. Preliminary analysis from interviews in Australia is then reviewed, before I conclude with some initial thoughts and further questions for discussion.

CONTEXT

BRIEF OVERVIEW OF EVIDENCE BASED POLICY

This section provides an overview of the EBP literature, drawing particular reference to Australia, where this research is undertaken. I note that I have come to this research from the perspective of Nudge, rather than EBP, and this is the lens I bring to the data. The intention of this section is to explain how I have situated the insights for this paper and how the concept of EBP is understood. A comprehensive review of this literature is beyond the scope of this paper.

EBP seen as the use of rigorous information and knowledge to inform policy making and processes, largely driven by a need for effective, efficient policy making (B. W. Head, 2015)). The calls for 'policy science' go back over half a century (Wesselink, Colebatch, & Pearce, 2014), but rose to prominence in 1990s (B. W. Head, 2015). The EBP movement has been historically driven, in Australia at least, by the need to understand and plan for complex policy challenges and trends, as well as a commitment to international organisations and networks that require ongoing data collection and evidence (B. Head, 2010). In 2008, about the time the book *Nudge* (Thaler & Sunstein, 2008) was released, the Australian government was reinforcing its commitment to evidence based policy, with then Prime Minister Kevin Rudd arguing the need for 'facts' on which to make policy decisions. Here the government also emphasised its support for trials and pilot studies (Rudd, 2008).

Evidence based policy is often seen as founded on rigorous scientific information, however valid forms of knowledge could also include political knowledge, the experience and expertise of policy makers, and the perspectives of clients and stakeholders (B. Head, 2010). Despite such attempts to widen the debate about what constitutes evidence EBP is seen as seen as favouring quantitative data and information over other forms of knowledge

(Wesselink et al., 2014). EBP is also criticised as presenting an unrealistic version of policy making, one that does not take into account the politics, stakeholder pressures and framing involved in policy making (Wesselink et al., 2014). For this reason, EBP is broadly seen as not having reached its potential in making large scale changes to policy and practice. Indeed, the EBP movement is seen to have been largely constrained by both political factors and organisational factors. Organisational factors could include the absence of practitioners' capabilities, desires and needs for evidence (B. W. Head, 2015).

Advocacy for the use of Randomised Control Trials has been a key element in the support for EBP, with the push for RCTs coming particularly from government ((Pearce & Raman, 2014). Supporters argue that RCTS produce more reliable, rigorous data than other forms of evidence or expertise (Pearce & Raman, 2014). Randomised Control Trials randomly assign members of a population into two groups. One is the control, to which there is no intervention, or no change of intervention, and the other group is given the new, or suggested intervention. At the end of the trial, the effectiveness is compared between the groups. Originally employed in medicine, advocates argue that RCTs are the 'gold standard' of evidence. However the growing use of RCTs has also been seen as risking the validity of qualitative research, privileging quantitative research and data over other forms of evidence (Pearce & Raman, 2014).

It is beyond the scope of this paper to provide a detailed overview of the EBP literature, and this has been done elsewhere. Here though I draw attention to the two key factors of EBP – the need for robust information and encouragement of its use in policy processes, both to inform and evaluate (B. Head, 2010).

In the next section I present the concept of Nudge, its emerging popularity how government reports suggest Nudging fits with EBP.

WHAT ARE NUDGES?

Nudges draw on the principles of behavioural economics and psychology in understanding human behaviour and apply them to the development and implementation of public policy. Here I outline the concept of Nudge as described by Thaler and Sunstein (2008), who wrote the book, *Nudge*. Thaler and Sunstein (2008) argue that people are subject to a number of different cognitive biases and heuristics that sometimes result in citizens making poor choices. Nudges rely on 'choice architecture', a concept that captures the role of context or environment in choice, suggesting that the way a choice is presented to citizens will influence the decision they make. Making a particular choice the default, for example, can powerfully influence the number of citizens who select that particular option. Importantly, Nudging is proposed to sit within the philosophy of Libertarian Paternalism. Nudges are, libertarian because citizens are still free to make their own decisions, but also paternalistic as they attempt to influence citizens' choices to improve their lives (Thaler & Sunstein, 2008). Although government can guide citizens towards a particular choice through changes to the choice architecture, Nudges are not coercive and people should be able to select another choice. In this way, policy makers are able to guide citizens to make 'better' choices, for themselves and society.

It is helpful to present two illustrative examples of Nudges, to demonstrate their structure and use. The classic, often cited illustration of Nudge is that of a cafeteria manager in a school. The manager notes that the children generally choose foods at their eye level, and at the beginning or end of the shelf, rather than the middle. The cafeteria manager could choose to put healthier foods in these more popular positions, to 'Nudge' children to make healthier food choices. Similar to an architect who designs buildings, this cafeteria manager can design the context and environment in which the choice is presented.

Another type of Nudge is to make the 'preferred' choice the default choice. A simple example of this would be to make double sided printing the default choice in an office, an intervention used during Obama's presidential campaign (Thaler, Sunstein, & Balz, 2010). An office worker can still choose to print one sided, but they would need to change the default option, making it more unlikely this will happen.

The ethics of whether policy makers should Nudge citizens towards particular choices, and the impact that Nudges have on freedom of choice and decision-making, has been a focus of much debate.

In Nudges, policy makers design the decision making environment, with Thaler and Sunstein (2008) labelling them 'choice architects' (Thaler and Sunstein, 2008). It is the policy maker's responsibility to design the environment in such a way that it help citizens make the 'right' decisions for themselves (Hansen & Jespersen, 2013). White (2013) argues that policy makers (or choice architects) are unable to act in every citizen's interest, as they cannot be aware of and consider each individual's own situation, values and preferences. They also cannot take into account the wide variety of situations and reasons why an individual may not want to make a particular choice. In this way policy makers cannot know whether they are Nudging citizens to choices they believe would make them better off. Traditional approaches by government are typically more overt than Nudging (Baldwin, 2014) and this covert nature of Nudging is a significant critique of the approach. Because Nudges are covert, and they make use of cognitive biases, Nudges have been labelled as manipulative (Goodwin, 2012; White, 2013; Wilkinson, 2013). For example, default options have been found to be a powerful tool of choice architecture and have a strong impact on choice, with citizens and consumers tending to select the default option (Craig Smith, 2013). Defaults are thought to work in three ways – implied endorsement, cognitive biases and effort. Cognitive biases include loss aversion, which suggests the impact of losing something is greater than if we were to gain the equivalent thing. The idea that default choices work through exploiting cognitive biases seems particularly troubling (Craig Smith, 2013). Defenders of Nudge argue that people can always make an alternative choice, other than the default. It is difficult to reconcile the argument that people have the option to make alternative choices other than the default, given that Nudges are built on the very principle that people will not always make considered rational choices and consider and evaluate each decision they make (Hansen & Jespersen, 2013). Nudges are also supposed to effect those that need them most, but it may be these very same people that find it most difficult to opt out (Baldwin, 2014).

Despite these ethical concerns, governments around the world are increasingly using Nudges and Behavioural Insights. A recent publication by the OECD (2017) reported that the

use of Behavioural Insights had 'moved beyond a trend' (p3) and there is evidence of centrally supported Behavioural Insights policies in 51 states around the world (Whitehead et al., 2014). The Behavioural Insights Team in the UK is arguably the most influential.

A note here on the use of terms in this paper. A recent report from the European Commission's Joint Research Centre suggested that behavioural economics, Behavioural Insights and Nudging are not the same concepts (Sousa Lourenço, Ciriolo, Almeida, & Troussard, 2016), yet academics and government generally use the terms interchangeably. I do not draw a distinction between them for the purposes of this paper, but note that the broader research project from which this paper is drawn seeks to understand the interpretations of Nudge and Behavioural Insights to explore whether and how they are distinct.

The Behavioural Insights Team in the UK was established in 2009 by David Cameron's Conservative Government. Commonly known as the 'Nudge unit' (Quigley, 2013), the unit worked with almost every government department, as well as local government, not-for profits, and overseas administrations. Behavioural Insights became required training for civil servants in 2012 (Strassheim et al., 2015), indicating how embedded the approach became in the UK. Nudging has been adopted so enthusiastically in the UK that it has been described as the default option for policy makers (Jones, Pykett, & Whitehead, 2014). The BIT unit is now an independent company, part owned by the UK government, an innovation charity and its employees, yet still most of its work remains with government (Rutter, 2015). The Behavioural Insights Team become strong advocates for the use of RCTs in public policy such that their promotion of this methodology has been called a core focus of their work (John, 2014). The Behavioural Insights Team published a report, essentially a 'how to' guide in 2012 advocating for the use of RCTs. Sections in the report include 'What is an RCT and why are they important' and 'The case for RCTs-debunking some myths'. (Haynes, Service, Goldacre, & Torgerson, 2012). In the report, the BIT claim that RCTs are the best way of determining whether a policy is working (page 4). This commitment to and advocacy of using RCTs and trialling policy seems to reflect the EBP support for ensuring effective policy and evaluating 'what works'.

In Australia, the focus of this research paper, government has enthusiastically embraced Behavioural Insights. There is now evidence of the use of Behavioural Insights through the establishment of Units in Victoria and New South Wales, in Family and Community Services in New South Wales and in the Queensland Government. In early 2016, the federal body for Nudging began its work. Named the Behavioural Economics Team Australia, the unit is designed specifically for applying and testing Behavioural Insights to policy (Easton, 2015). I outline in more detail below the two centralised units in New South Wales and Victoria, drawing attention to how their official reporting and documentation interprets the EBP movement in relation to Nudging.

The Behavioural Insights Unit in NSW began work in November 2012. Established as a partnership with the UK team, the unit is situated within the Department of Premier and Cabinet. The team has worked across a range of areas, including cancer screening behaviours, private health insurance uptake and return-to-work programs, childhood obesity and domestic violence (Behavioural Insights Unit, 2016). Here I describe one

example of a trial run in NSW. In partnership with the Office of State Revenue the trial tested the difference in letters encouraging citizens to pay their fines. Using a randomised control trial design, one version of the letter was that usually sent to citizens, the other version incorporated Behavioural Insight principles, including, social norming (for example, 8/10 people pay their tax on time), salience (introducing directions on what is required) and priming (from using blue to red colours as fines became overdue). The trial was deemed a success, with a 12% increase in payments received on time (Behavioural Insights Community of Practice, 2014). This case study was one of the first trials undertaken by the BIU, and there is an emphasis on both the use of RCTs and quantitative measures to indicate success.

In a report released by the NSW Behavioural Insights Unit, the Unit included in a list of reasons for using Behavioural Insights that 'it is consistent with our evidence based approach'. Their website reiterates the EBP discourse, outlining they are 'driven by evidence' and 'trial interventions to help identify what works' (Department of Premier and Cabinet (NSW)). Similarly, in one of its strategic communications of the role of the Behavioural Insights Unit in NSW, government argues:

Trials help develop better policies and services. The application of Behavioural Insights goes hand in hand with an experimental approach to designing policies and services. Randomised controlled trials are a valuable tool to generate the evidence needed to learn what works and what doesn't. This evidence-based approach enables us to adapt our policies so that they steadily improve both in terms of quality and effectiveness. (Behavioural Insights Community of Practice, 2013)

In official government documents, there is an intertwining of EBP rhetoric and rationale for Behavioural Insights.

In the state of Victoria, a Behavioural Insights Unit, also located in the Department of Premier and Cabinet, was established in 2016. Although only relatively new, the unit highlights that Behavioural Insights are used to make policy more effective. The website states that RCTs are used wherever possible, reflecting the notion of the RCT as the gold standard. Indeed, the Unit explicitly links EBP rhetoric with Nudges arguing; *Central to Behavioural Insights is the principle of testing. Where possible, public policy should be supported by robust evidence.* (Department of Premier and Cabinet (Vic), 2017)

METHOD

In this research, I am concerned with how policy makers interpret Nudge and Evidence Based policy, and it is important to anchor these understandings in that context, here the government in which the policy makers are situated. This research adopts an interpretive approach with a focus on meaning and who is making the meaning (Yanow, 2007). An interpretive position regards policy as rooted in, rather than existing independent of, an historical and cultural context (Yanow, 2006). In interpretive research, people are social

actors, actively constructing concepts (Yanow, 2006). In this research, I seek to understand and map the many varied and different perspectives of policy workers.

As is typical with interpretive research, qualitative interviews were undertaken, and in this research the interviews were with policy workers. Colebatch, Hoppe, and Noordegraaf (2010) argue that it is not just the public service that is involved in developing policy, but policy workers, such as NGOs, think tanks and industry bodies. These policy workers bring their knowledge to policy, and may be involved in the design and implementation of policy. In this research, I interviewed academics involved with Nudges and Behavioural Insights, who had consulted to or advised government. I also interviewed consultants who had worked or were working with government in the Nudge area. I interviewed a range of public servants, working in departments, agencies and regulatory bodies across different levels of seniority (referred to here as policy officers). All participants were based in Australia. Participants were recruited using a snowball sampling approach, and many of the participants were familiar with the concept of Nudge and its application to government. In depth interviews lasted approximately one hour, though in some cases longer. The interviews were open-ended, and guided by participants and where possible they were undertaken face to face. Data generated from 17 interviews was analysed for this paper, and thematic analysis was undertaken using Nvivo 11.4.30. The specific projects and policies discussed have been anonymized or obscured for the purposes of reporting, however the policy areas discussed included health, environment, water and community/social policy issues.

FINDINGS

The following section outlines preliminary ideas emerging from the interviews. A number of emerging themes are identified from the analysis which are described below, drawing on detailed comments where relevant.

The first theme that emerged from the data was the emphasis on Nudge's evidence base. One policy officer for example, when asked why people were choosing to use Nudge, responded, '*Well because it works*'. This was by no means the only reason offered, but there was a general consensus that the evidence for Nudge's effectiveness was strong. This sense of Nudge's strong empirical foundations was garnered from the results of RCT approaches undertaken by centralised teams in the UK and Australia. Policy workers spoke of how this development of case studies to demonstrate Nudge's effectiveness was a deliberate strategy to build an evidence base, and thus create an appetite for Behavioural Insights. When the Nudge approach was first adopted in Australia, a number of RCTs which had been deemed effective in the UK were replicated. These were considered to be traditional Nudges, with small contextual changes to the choice architecture made to encourage a choice, such as changing the format and information contained in letters described in the NSW case study above. These particular trials were undertaken to get some 'quick wins' on the board to demonstrate the effectiveness of Nudge, and developed into example case studies, which could then be shared with the public service to demonstrate the

effectiveness of the approach. By using the RCT model, policy workers were able to point to percentage increases and case studies that demonstrated the impact of Nudges. As another policy worker commented:

“It’s a really appealing idea that you can just make these subtle changes in choice architecture and get these much better outcomes and certainly they produce of fantastic case studies, some really good examples of dramatic impacts that its ...I see the case studies and it [Nudge] being a very effective tool in particular circumstances.” Policy officer

For other policy workers, this sense of Nudge’s evidence base came from perceptions that because Nudge was developed from academic theory, the approaches would have solid empirical foundations. These academic foundations, and particularly because psychology and behavioural economics are experimental fields, generated a sense that there would exist robust evidence underpinning the movement, even if these were not personally understood by the policy workers. The emphasis on RCTs and development of these case studies not only reinforced the importance of having an evidence base, it appeared to emphasise the type of knowledge that is seen as legitimate – quantitative evidence with percentage points that could point to impact and outcomes.

In Australia Nudge appears to have built momentum by capitalising on the desire of a public service seeking an evidence based approach. By positioning Nudge as an effective tool with a solid evidence base, advocates leveraged the momentum behind the EBP movement to encourage use of Behavioural Insights. In some ways, this interpretation of Nudge and RCTS as interwoven has also constrained the use of the Behavioural Insights. Policy workers may see that Behavioural Insights can only be used by employing RCT. For example, one policy worker spoke of how team members did not believe they would be able to use principles of Behavioural Insights because of short funding cycles, and within that organisation they wouldn’t have the time to run a trial.

“I guess one of the biggest barriers that I see is being able to incorporate it in design because the funding cycles are so ... they put a lot of pressure, and the way we’re funded, it’s really hard to say, “Give us money for a two year trial, or a one year trial ... just for a trial. You need to have something at the end of it that’s tangible, and that there’s an outcome, and the outcome can’t always be some knowledge, so I think that’s a pressure that we’ve got big time.” Policy officer

Indeed, advocates of Nudging talked about how although through the use of RCTs, Behavioural Insights was originally able to prove its impact, they are now seeking more ‘nuanced’ approaches. Nudging, and its emphasis in government on Randomised Control trials seems to have benefited from the EBP movement. This emphasis on evidence and methodology has been so great that some policy workers’ interpretations of Nudge and EBP seem to be interchangeable. The emphasis that Behavioural Insights has publicly placed on the importance of evidence, and of methodologies that test policies, seems to be reflected in the way some policy workers talk about Nudging. For example, when asked whether they thought Nudging was new, one policy worker responded;

“There's nothing new in testing a hypothesis; there's nothing new in experimentation; there's nothing new in having well known design interventions; there's nothing new in understanding cognitive science....” Policy worker

Here we see that ideas on the novelty of Nudge are interpreted as whether the methodologies advocated by Behavioural Insights to encourage an evidence base are new. This suggests that interpretations of Nudge include Nudge as EBP. These types of comments seem to reflect government sentiment that Nudges and RCTs go ‘hand in hand’ and yet goes further, entwining the constructs of Nudge and EBP. The implication here is that Nudge may not only be limited in its use by those who believe it is entwined with a particular methodology, it may be reshaping what is interpreted as valid evidence. This idea is discussed further below.

The interpretation of Behavioural Insights as EBP has become so interchangeable for some, that when asked about the broad ethical considerations of Behavioural Insights, the ethics of randomised control trials are instead invoked. One policy worker, when asked about the ethics of Nudge and Behavioural Insights responded;

“So we should actually be thinking about the ethics of what we're doing and what happens to those who are in the control. So if you miss out in the stuff like that. And particularly for social policies, I think definitely one of the nervousness ... One of the bits that they're nervy about is like, "If we have a control in an intervention for something as important as health or housing or community, if people are in the control and they miss out, what happens to them?" Is not doing something for them going to have a consequence?” Policy officer

In this way, the ethics of Nudge are obscured, and questions of whether government should be Nudging, how policy workers are retaining freedom of choice or governments role in influencing citizens are, for some, not considered. Rather, ethical concerns are tied up in whether it is fair to apply an intervention or project that government thinks are likely to be more effective to only a small number of people it could potentially benefit. It is not to say that these are not important ethical considerations for government to reflect upon, but rather comments are included to draw attention to how Nudge and RCTs are entwined in some policy workers’ understandings.

As Behavioural Insights has become more popular its emphasis on evidence seems to be creating fertile ground for the EBP movement. Policy workers spoke of the importance of Nudge being its evidence based approach. These policy workers saw Nudges’ relevance as a new tool, but also that its emphasis on evidence and on methods to test and evaluate policies, meant these ideas were now considered seriously at the heart of government.

“Seizing the interest in Nudge by senior executives and decisions makers is actually more fundamentally important than Behavioural Insights, because there's probably a lack of respect in government for evidence based policy. They don't have time to evaluate, and they just want to get releases and announcements done, and they want to pass laws... so getting respect for the idea that we're going to do this in two different ways in two different places or getting respect for the way that we're going to have a crack, find out what happened and didn't work or did work before we do it, is actually more deeply important than Nudging is,

because you're actually building in the understanding of evidence based policy and programme delivery". Policy officer

"One of the great strengths...is basing it all on evidence-based policy. So really bringing evidence-based policy into the centre of government. ... There's a wide range of tools and Nudge is one tool. But I think the way the Nudging has been positioned in government and they create some really good results including the kind of things that governments like, like revenue collection, means that the introduction of the power of evidence-based policy has been demonstrated and I think that's incredibly useful." Consultant

Finally, Nudging appears to not only be creating momentum for the EBP movement, it is influencing the shape of that evidence. With its emphasis on Randomised Control Trials, Behavioural Insights has emphasised a particular type of evidence. Quantitative evidence, that can be depicted in charts and graphs, that translates into percentage point increases, means this quantitative evidence is being privileged over other forms of data. One policy worker reflected on how a colleague, after having been presented with qualitative information, responded with *"I'm not here to hear stories! I'm here to hear findings!"* Although this may be a secondhand account, it seems to reflect a particular, growing interpretation of what is valid knowledge and evidence. Another policy worker interviewed commented one advantage of Nudge is that:

"Nudge seems to be creating more attention towards the need to have analysts as part of what you do, that you have to work with a statistician, or you have to work with an analyst or somebody who crunches numbers to actually know what the answer is". Policy officer

There is a perception that statisticians and analysts are *needed* in government, reflecting the emphasis on quantitative data. Nudge then appears to be encouraging the organizational desire to use evidence in the design and testing of policies. Similarly, Nudge has supported a focus on evaluating policies, albeit to test if a policy works before it is implemented more widely, rather than post-hoc evaluations. However, it seems to be influencing towards a particular type of evidence being sought and seen as valid. This is presenting challenges for policy workers who are seeking to broaden evidence beyond randomized control trails and quantitative data. Through the use of case studies of Nudges using RCTs with easy to understand charts, Nudge also seems to be creating, or reinforcing a desire for easily understood and easily communicated results.

"I think people want data...and I think people are assuming with Nudge that all behaviour can be quantifiable when it's really not." Policy worker

"They don't want to get their head deep into it, they just want the headlines. The soundbites, things they can take away and go we did this, we increased it by x percent, or if we do this this many people are going to be affected, to have those real quick graphs that are easy to understand."- Consultant

The increasing use and awareness of Nudging and Behavioural Insights in government policy is not only putting evidence at the fore, it is reshaping, or perhaps reinforcing notions that quantitative data is important, and potentially the only valid form of evidence.

CONCLUSION AND FURTHER QUESTIONS

This paper began by introducing the concept of Nudge, some of its ethical challenges and by outlining its increasing use, drawing particular attention to the Australian case. I then briefly reviewed the EBP literature, acknowledging that this research has come from an interest in Nudge, rather than EBP. I then described the methods used in this original research before outlining the initial findings from the thematic qualitative analysis.

This research suggests that the relationship between EBP and Nudge is interwoven and complex. Initially, EBP may have provided fertile ground for Nudge, with Nudge positioned as having a robust academic foundation and with a focus on finding 'what works'. The use of RCTs means those advocating Nudges presented quantitative results demonstrating that a policy trial was 'x% more effective'. These case studies of RCTs seem to have resonated with a public service that were seeking to implement approaches with a rigorous evidence base. This emphasis on using RCTs with Nudges has created an intertwining of tool and methodology, which for some, has restricted the potential of Nudge as they consequently see its application only for large scale long term projects. Yet for others the resulting enthusiasm for Nudge is seen to have raised the importance of, and broadened the audience for, evidence based policy. By prioritising RCTs, Nudge is influencing perceptions of what type of evidence is seen as legitimate, reinforcing a notion of evidence that privileges quantitative data and information. This raises questions on the role and perceptions of qualitative data generated through interviews or ethnographic studies, and how this is interpreted by the public service. Moreover, it risks demoting other forms of knowledge, such as policy makers' experiences and the stories of clients and stakeholders. These forms of evidence may be qualitative in nature, and the interpretations of their legitimacy means they may be excluded in the development or evaluation of public policies.

This paper contributes to empirically informed scholarship, by including the interpretations of policy workers in the Nudge literature, and provides important insights on how Nudge is influencing policy workers' perspectives on what constitutes evidence. At the same time the paper is necessarily limited by its focus on the Australian case. Understanding and comparing how policy workers in other states understand Nudge and EBP would enhance our understanding of these issues. This research also uses a snowball sampling approach, and many of the policy workers were at the forefront of the use of Nudge, if not specifically advocating for its use. Hence they may be more likely to be open to and embrace the evidence based policy movement. Although not the focus of the interviews, it appeared that almost all of the policy workers I spoke to were supportive of the evidence based policy movement. Further research is needed to understand how this phenomenon is interpreted among a broader, more diverse group of policy workers.

It is likely that interpretations of the importance of evidence, and what constitutes evidence, will differ across types of departments, agencies and regulators, reflecting each organisation's own government's traditions. Understanding more about how policy workers interpret evidence based policy, and how Nudge fits into this (rather than my approach of how EBP fits into Nudge) warrants further attention.

Broader research undertaken for this project is also seeking to understand how Nudge is seen to be the same or different from Behavioural Insights. Preliminary research suggests Behavioural Insights seems to be embracing broader methodologies, and exploring how this approach will seek to build an evidence base, and how this will influence interpretations of evidence, would provide further insights into this area.

Nonetheless it is hoped that although preliminary, this research will add to policy scholarship and practice, and encourage policy workers' reflection on the use of different types of evidence and how these are used and understood.

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