Panel T08-P15 Session 1

Varieties of Behavioural Public Policy: Modes, Manifestations and Political Consequences of a Global Discourse

Title of the paper

Moving beyond the obsession to nudge individual behaviour: Towards a broader understanding of applying behavioural insights to public policy

Author(s)

Benjamin Ewert

FernUniversität in Hagen, Germany

benjamin.ewert@fernuni-hagen.de

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Abstract

Behavioural interventions are much more than just another policy tool. Instead, using behavioural science process bears potential for a wide-ranging reassessment of policymaking and public administration. However, Behavioural Public Policy (BPP) is still a policy paradigm 'under construction' that has not fully established yet. The paper seeks to contribute to this process by investigating the conceptual features of advanced BPP that go beyond the notion of nudging individual behaviour change. Thus, the somehow locked debate that, so far, mainly revolves around the pro and cons of nudging citizens' individual behaviour toward desired outcomes will be illuminated. It is suggested to perceive BPP as a pluralist, non-deterministic and multipurpose approach that allows the application of behavioural insights 'throughout the policy process' and in combination with regulative policies. The paper's line of argumentation unfolds in three steps: First, nudge's driving policy rationales and the essence of its conceptual, methodological, ethical and ideological criticism are recapitulated. In a second step, state-of-the-art BPP that claims to be more substantial and wide-ranging than current nudge tactics becomes empirically examined. BPP's potential but also barriers are revealed by drawing from interviews with global thinkers (i.e. academics and practitioners) in the field of behavioural insights. Finally, it will be discussed whether advanced BPP is better suited to withstand the criticism on nudge.

Key words: Behavioural Public Policy (BPP), behavioural insights, nudge, policy integration

1. Introduction

Behavioural Public Policies (BPP) have been established as a new strand in public policy research and policymaking. Alongside this process, the initial question *if* policymakers should use behavioural insights has been replaced by the more practical questions *where, when* and *how* they should be used in the policy process. As it turns out, these questions are no less controversial than the former since they open up the debate on the actual focus, scope and scale of BPP. While for example BPP proponents argue that behavioural science bears potential for a 'wide-ranging reassessment of public administration' (Sanders et al. 2018, 4), political scientists call, in a more modest manner, for 'a dialogue about a behavioral approach to public administration' (Grimmelikhuijsen et al. 2017, 54). Above all, such a dialogue requires mutual understanding on how the policy process should be informed by behavioural insights and how behavioural approaches are integrated into existing policies (Kuehnhanss 2018). In addition, understanding has to be reached on policy targets of BPP.

As argued in this paper, BPP, to be defined as 'as a policy intervention that is directly inspired by, and designed on, the principles of behavioral research' (Galizzi 2014, 27), is regarded as a potentially pluralist, non-deterministic and multipurpose approach. In this view, the utilization

of behavioural insights may complement and refine existing policy approaches rather than be a stand-alone concept. Hence, behavioural insights could be applied to change individual, collective and organisational behaviours; likewise, they may be used to merely inform conventional (i.e. non-behavioural) policymaking by providing evidence about policy problems and the expected behavioural implications of (combinations of) policy tools. If understood such broadly and not (mis-)used in an ideological manner, an advanced version of BPP may pick up the threads of a more nuanced and sophisticated debate on behavioural approaches that has been overshadowed by the nudge revolution such as the thread on 'ecological approaches to human behaviour' (Halpern et al. 2004, 15) that analyse how behavioural patterns are embedded in social contexts and shaped by social interactions.

Against that backdrop, the following research question will be pursued in this paper: *What are the conceptual features of advanced BPP that go beyond the notion of nudging individual behaviour change?* Answers to this question contribute to the theoretical discourse on behavioural policymaking (John 2018; Oliver 2015, 2017) and its critical reflection (Feitsma 2018; Jones et al. 2013; Leggett 2014), moreover, it provides some lessons for policy design and policy integration in general (Howlett and Fraser 2018; Peters 2018). However, it is also argued that the current criticism on nudge and the use of behavioural insights do not disappear just because a *behavioural lens* is more frequently applied to standard approaches of public policy and administration (Loewenstein and Chater 2017; Moynihan 2018). Instead, advanced BPP has to engage with and refute this criticism, both, theoretically and practically.

Thus, the paper seeks to contribute to the recent international debate on a realignment of BPP. Using behavioural insights in public policy, as it can be distilled as the lowest common denominator, should be more than a synonym of nudging people towards desired behaviour change. For example, Sanders et al. (2018, 14) state that behavioural interventions could also be 'a tool to improve the way government itself functions', while according to a OECD report (2017, 49) 'the application of behavioural insights to change organisational behaviour within and outside government' has to be intensified. Likewise, Lourenço et al. (2016, 42) argue that behavioural science 'represent an input to the policy process' that remains largely untapped so far.

The paper unfolds in three steps: First, the essence of nudge – i.e. its driving policy rationales and assumptions – are briefly introduced, followed by a recapitulation of the conceptual, methodological, ethical and ideological criticism that nudge policies have provoked. Second, state-of-the-art theoretical thinking on BPP will be empirically examined based on an analysis of semi-structured interviews with global thinkers and practitioners in the field of behavioural insights. Hence, the paper sets out to develop a broader understanding of using behavioural insights that may lead to modified forms of applications in public policy and administration. In a third step, based on an interview analysis, conceptual features of an advanced BPP will be identified; moreover, it will be discussed whether advanced BPP is better suited to withstand the criticism on nudge. A brief conclusion follows.

2. The essence of nudge and its criticism

More than ten years after Thaler and Sunstein published *Nudge* (2008) behavioural insights are frequently used in public policy. While the initial discussion on nudging mostly revolved on rather banal modifications of human behaviour – ''low-hanging fruits'' (Sanders et al. 2018, 19), such as the rearrangement of food displays or the design of anti-spatter urinals – behavioural insights are recently perceived as a much broader tool that 'gives a scientific foundation to the policy development process' (Lunn and Robertson 2018, 24). In what follows, I will first briefly summarise the essence of nudge interventions as they emerged from Thaler's and Sunstein's (2008) bestseller. Second, I will recall the conceptual, methodological, ethical and ideological criticism nudge has been provoked.

2.1 Nudge – a selectively applied policy approach

It is worth to keep in perspective that making use of behavioural insights is no policy aim in itself, but a principle to be applied to public policy. Accordingly, knowledge on 'what drives human behaviour and how to change it for the common good' (John 2016, 113) should improve attempts of public policy redesign. Here, the novelty concerns the systematic way this knowledge on human behaviour is produced, i.e. mostly through scientific experiments based on Random Control Trials (RCTs) (Haynes et al. 2012). By using insights from behavioural

sciences policymakers are able to develop a real-word understanding of people's bounded rationality that is largely framed by environmental cues (e.g. people stick to a certain behaviour unless they are externally prompted to behave differently). By definition nudges seek 'to alter people's behaviour in a predictable way, without forbidding any options or significantly changing their economic incentives' (Thaler and Sunstein 2008, 6). In recent years, nudge has become a synonym for a range of different techniques to influence human behaviour such as norms, defaults and salience (Dolan et al. 2010, 2012). As a guiding principle, 'nudge theory goes with the grain of human nature instead of trying to change it' (Vlaev et al. 2016, 552).

However, if we agree that using behavioural insights is first of all a principle to be applied in public policy, behavioural interventions are by no means restricted to a certain policy level or target group. So far, most nudges address the individual behaviour of users, consumers and citizens; though, theoretically, behaviour insights could also be applied to change the collective behaviour of organizations and/or the behaviour of policymakers and public servants. For example, MacKay and Quigley (2018, 14) state that behavioural insights may 'also be used in a way that supplements regulation which tackles systemic issues'. Such a perspective has less in common with the understanding of nudges and underscores the necessity to distinguish between behavioural insights as a principle to be used in policy design and its actual area of application. While the former is universal – behavioural insights may inform all stages and stakeholders of the policy process –, the latter strongly depends on policymakers' underlying assumptions (Ewert 2019).

2.2 Reassessing major criticism on nudge

Despite being labelled as a 'quite revolution' (John 2016, 113), to be supported across political camps, behavioural insights have provoked a good amount of criticism. For the purpose of this paper, conceptual, methodological, ethical and ideological criticism of nudge (see also John 2018 and Leggett 2014) polices are distinguished, although they de facto often overlap and reinforce each other. As shown, much of the criticism on nudge stems from its narrow scope as a policy approach but also from the insufficient extent to which behavioural insights are related and intertwined with existing policy approaches and tools.

According to the conceptual strand of criticism the current use of behavioural insights is inappropriate to adequately address complex policy problems (Bhargava and Loewenstein 2015). In essence, there are doubts whether nudges could remedy the more distal causes of policy problems, i.e. foremost its economic, social and spatial dimensions. Considering for example major public health problems, such as obesity, there are serious objections that behavioural interventions are useful to tackle the complex melange of a powerful food industry, poverty, inequality and urban deprivation that nourishes obesity (Chaufan et al. 2015). While critics do not doubt the effectiveness of behavioural tools in total, they are questioning nudge's scope and scale. Thus, nudge is perceived as a concept of 'limited range' (see also John 2018, 88-91) that is likely to be indifferent towards the social context in which individual behaviour is embedded (Brown 2012; Leggett 2014). Moreover, it is deemed to be an inherently technocratic, top-down and elitist approach (John et al. 2011; Room 2016). Technocratic because behavioural interventions are perceived as a government-controlled roll-out of one-fits-it-all nudges that are 'offering merely technocratic tweaks' (Hansen 2018, 191) to complex policy problems. Top-down since nudges are likely thought of and designed by choice architects employed by governments while, for example, citizens and collective civil society stakeholders have little say in the design of nudges. Finally, respective policies are described as an elitist project that exclusively draws from scientific knowledge and expertise that inevitably marginalizes lay knowledge and everyday wisdom. As predicted, this may lead to an emerging 'nudging state' (Button 2018) that subtly undermines established state-citizen relations by placing citizens' compliance to cost-effective policy solutions over the virtues of democratic citizenship.

The methodological strand of criticism regards nudge as unsuitable to eliminate the deeper causes of policy problems. As said, behavioural techniques are geared to nudge individual behaviour change based on positivist evidence predominantly gathered through RCTs conducted in laboratory settings. Due to this methodological monism current behavioural interventions seem unappropriated to reflect the diversity of people's life-worlds (Spotswood and Marsh 2016). RCTs that test whether citizens could be nudged to become organ donors are a telling example. Quigley and Farrell (2019, 198) conclude that those methods do not 'adequately engage with the complex and often fraught context in which family decision-making about organ donation takes place immediately following the loss of a loved one'. In

addition, the methodological bias limits behavioural insights' area of application from the outset. Hence, it is stated that it requires the whole range of scientific disciplines and methods (van Bavel and Dessart 2018) to conduct more far-reaching experiments that are pre-tested and piloted before becoming mainstream policies (Lunn and Robertson 2018). As criticized, methods that underpin most nudges are insufficient to address 'actual 'thorny' behavioural problems that traditional policies often seem to get wrong from the beginning' (Hansen 2018, 192).

Furthermore, there is an fierce debate about the ethics and the political morality of nudge (Bovens 2009; Selinger and Whyte 2011). In essence, nudges are perceived unethical because modified choice architectures systematically override people's own interests (White 2013). Hence, critics rebut the claim that nudges merely influence people's behaviour in directions 'as judged by their own preferences' (Thaler and Sunstein 2008, 10). Moreover, doubts exist whether citizens actually agree with well-intended nudges that pretend to promote reasonable and rational behaviours. As stated, nudges reflect 'the behaviour [policymakers'] want to see' (White 2013: 101) rather than engaging with citizens' actual preferences in a meaningful way. For example, in contrast to what behavioural policymakers assume people may have good *personal* reasons to smoke, to eat unhealthy or to decide against a medical therapy (White 2016). Thus, in the eye of critics nudge does not preserve people's autonomy, self-government and dignity but consciously exploits their bounded rationality. The fact that many nudges work covertly (Oliver 2015), i.e. influencing people's behaviour without making the normative goals and motivations behind nudges transparent, exacerbates ethical reservations.

The ideological criticism classifies nudge as a 'political project' (Quigley and Farrell, 2019) or 'strategic neoliberal project' (Jones et al. 2011, 488) that has become a tremendous powerful policy paradigm (Béland and Cox 2013). In line with this strand of criticism, nudge tactics are seen as an instant, though helpless, remedy against neoliberalism's vexing social problems that focuses exclusively on the micro-level: the subtle governance of individual behaviour. Moreover, it is argued that nudges, being a welcome and easy to apply alternative to any forms of regulatory governance, ensure the continuation of 'neoliberal governmentality' (Jones et al. 2013) and, therewith, the hegemony of the neoliberal economic model. As criticized, nudge's success relies on its low threshold nature as 'as a form of light-touch, low-cost regulation'

(Quigley 2013, 599) that bear little political risk for policymakers: If nudges proved to be effective they buttress political capacity to act in neoliberal times. If nudges fail, policymakers will hardly be blamed because, in contrast to costly investments in hardware infrastructure or subsidy programs, nudging is a form of intervention that *disappears* as soon as it has been applied. In comparison, more comprehensive policy approaches that combine behavioural, regulatory and financial tools, do not provide the same opportunistic advantage for policymakers but include a considerable risk of failure.

As demonstrated in the next section, theoretical and practical thinking on behavioural insights goes beyond nudge and its criticisms by extending its meaning.

3. An approach under construction: Experts' view on Behavioural Public Policy

If BPP is something more substantial than nudging people towards predefined ends, the question is: What exactly should it be? In order to bring flesh to the bones of a broader concept of BPP semi-structured interviews with *global thinkers* (i.e. distinguished academics, policy advisers and/or practitioners) on behavioural informed policymaking have been conducted.

3.1 Methodology

Interviewees were selected based on a systemic internet research on experts in behavioural insights in public policy. Thereby the following selection criteria were applied: Interviewees should have an expert status, proved by high-ranking publications and/or a leading position, in academia (ACA), international organizations (IOs) such as the EU, the OECD or the World Bank or Behavioural Insights Teams (BITs). To grasp a wide variety of knowledge and expertise on behavioural policymaking interviewees were not necessarily supposed to be advocates of behavioural insights but could also be critical friends or observers that experience the behavioural turn in public policy first hand. Thereby, it was ensured to examine a wide range of views on BPP, that, nota bene, is not perceived as a coherent policy paradigm but one that is currently *under construction* or *in the making*. All together 20 experts – nine from ACA, five from IOs and six from BITs – were approached by e-mail. Ten experts – five from ACA (including two hybrids that conduct behavioural experiments on their own and maintain close

contacts to BITs), two from IOs and three from BITs (including one hybrid with close contacts to academia) – agreed to be interviewed. Interviewees were spread throughout several geographical regions: Four came from the UK, three from EU member states, two from Australia and one from the US. Based on a semi-structured format (see Table 1 in the appendix), interviews (Intw1-10) took place either face-to-face (four) or via Skype technology (six). All interviews, taking 31 to 65 minutes, were recorded, transcribed and anonymised. Interview data were examined in an iterative analysis process by using the coding software MAXQDA. First, all transcripts were read carefully. Second, main codes such as 'evolution of BPP', 'policy experimentation' or 'nudge units' were defined. Third, single interview sections – which were no longer than one paragraph – were assigned to one or multiple codes; if useful sub codes such as 'underlying philosophy' for the main code 'evolution of BPP' were formed. Moreover, two additional main codes 'limits to BPP' and 'policy integration' were added to take account of the fact that many interviewees see merits in behavioural approaches only if combined with other policy tools. The final coding framework (see Table 2 in the appendix) resulted from several rounds of reading and selective coding. Results from the interview analysis are summarized by three recurrent topics (see 3.2-3.4); in order to be able to classify direct quotations, interviewees' respective field of work are indicated (e.g. Intw4_ACA).

3.2 Adopting a behavioural lens: 'We don't just do nudges'

Frequently used vocabulary is a first indicator to determine how behavioural policymaking has been developed in recent years. While 'behavioural science' and 'behavioural insights' are naturally used terms in relation to behavioural policymaking, interviewees do not use the academic term 'Behavioural Public Policy' (Oliver 2017) to describe a 'landscape which is evolving very quickly' (Intw2_IO). Nor is the term 'nudge' used as a synonym for applying behavioural informed policies. Respondents admit that Thaler's and Sunstein's (2008) magic formula has accelerated and amplified the 'systematic and rigorous application of behavioural insights to the policymaking process' (Intw3_IO). However, although 'nudge 2008 gave it a big push' (Intw3_IO) nudging is preliminary seen as a 'rhetoric' (Intw4_ACA) that fits for limited duties. Nudge's initial strength – being catchy, intuitive and simple – is considered rather obtrusive towards the further evolution of BPP that requires to 'understand complex

behaviours' (Intw10_BIT). Even interviewees from BITs back that position by stating that in most cases 'small nudges aren't going to solve the entire problem' (Intw8_BIT).

If nudging is perceived as 'a narrow subset of one way of applying behavioral insights' (Intw3_IO), a broader version of behavioural policymaking means to apply a 'behavioural lens' (Intw8_BIT) to the policy process as a whole. Thus behavioural insights ought to be 'part of the way every policymaker thinks about policy' (Intw1_ACA). One interviewee, being specialised in public health, further illustrated this point by stating that 'behavioral sciences are the sewage for the 21st century' (Intw7_BIT). By and large, interview data reinforces Oliver's (2017, 174) conclusion that so far BPP is 'somewhat nebulous and ill defined'. Some interviewees, mostly those from BITS and IOs, stated that, first of all, BPP requires a specific attitude or mind-set rather than a predefined set of criteria that constitutes BPP. Ideally, behavioural policymakers ought to be free of assumptions and prejudgments, 'starting with a clean sheet and going after what is really the issue they want to solve (…) what are the best tools to solve the issue' (Intw2_IO). Although this view remains controversial – there are good reasons to argue that policymaking is per definition driven by underlying assumptions that prevent non-judgemental attitudes from the outset – it reflects practitioners' pragmatic notion of BPP that always starts by 'asking what is the problem' (Intw8_BIT). Following this line, advanced BPP is constituted as the sheer opposite of technocratic tweaks, i.e. a 'whole systems approach (…) being applied across whichever model you want to think about' (Intw7_BIT). Hence, every policy issue could be examined through a behavioural lens. Taking this claim seriously means to shift the attention from individual choice architectures to a wide range of 'behavioural connections' (Intw9_ACA) – perceived as each and every stakeholder interaction – throughout the policy process. Providing evidence-based information on behavioural connections (i.e. heuristics and biases but also people's preferences and motivations) allows then a more 'radical use of behavioural science' (Intw5_ACA). Thus, BPP is 'always more than just nudge (…) it's about thinking about understanding how people actually behave and practice to improve how policy is made' (Intw8_BIT).

If we accept such a broad understanding of BPP as a starting point, clarifying its methodological basis comes next. Consequently, most respondents argue for 'methodological diversity' (Intw5_ACA) even if RCTs remain, as assured by a BIT member, the 'gold standard of

evaluation methods' (Intw8_BIT). In contrast to the methodological criticism on nudge, BPP is labelled as a creative 'try and test approach' (Intw9_ACA) with an 'affinity to mixed methods' (Intw1_ACA). Especially qualitative methods would allow 'to zoom in particular contexts' (Intw3_IO) in order to investigate whether a policy problem has a 'behavioural component to be engineered with behaviour levers' (Intw1_ACA). As a rule of thumb, it is recommended 'to match your method to the research questions' (Intw5_ACA). In particular, solving more difficult policy problems – say the behavioural impact of urban environments to childhood obesity (Guy's and St Thomas' Charity 2018) – calls for a 'robust evaluation' (Intw8_BIT) based on mixed methods. With an eye on childhood obesity, policy evaluation based on mixed methods may reveal 'what the behavioural impact of different kinds of interventions might be' (Intw8_BIT). In general, the 'embedding of behavioral insights into the policymaking process' (Intw3_IO) could result in the selection of any policy instrument – 'like a regulation or a directive, but it's not necessarily a nudge' (Intw3_IO).

3.3 Moving on to bigger problems and 'a wider range of behaviours'

Behavioural policymaking, almost subconsciously, 'started off with the sort of simpler problems' (Intw8_BIT) such as choice architectures in canteens or default settings in pension schemes. One interviewee, regularly advising the government how to use behavioural insights, commented this choice by stating that 'there's no point in going in with something incredibly risky (…) unless you've built a long-term relationship with policymakers' (Intw9_ACA). Hence, time has to be ripe to move on to advanced BPP that addresses 'questions that are a bit more difficult' (Intw8_BIT). Shifting the focus to 'more complex behaviours' (Intw8_BIT) – being an unspoken consensus among all interviewees – requires context-specific behavioural interventions. For example, if schools are located in deprived neighbourhoods students' eating habits are not changed by modified choice architectures alone but depend on multiple 'environmental pressures that are driving behaviour' (Guy's and St Thomas' Charity 2018). As claimed, major problems such as social inequality and poverty can be tackled by 'using behavioural insights in tandem' (Intw10_BIT) with other approaches (see 3.4). As illustrated, behavioural science allows to disclose different aspects of a particular policy problem by distinguishing 'what is behavioural, what is systemic' (Intw2_IO): 'People tend to be couch

potatoes, which is a behavioural aspect, but it might be the case that there are no food path where you can walk, that will be a systemic problem' (Intw2_IO).

Interviewees recurrently claim that BPP has not fully rolled out yet but continue to be stuck in a pilot phase; hence, the application of behavioural science 'across the spectrum' (Intw7_BIT) is still pending. Moreover, most respondents join the conceptual criticism that, so far, behavioural interventions are almost exclusively applied to change the individual behaviour of citizens and consumers. Some interviewees refer to ideological reasons by stating that in 'the neoliberal world space the behaviourist turn is incredibly strong' (Intw4_ACA). Accordingly, the current use of behavioural insights represents just 'another piece of government policy that privileges the individual level change' (Intw10_BIT). Linked to this, one interviewee criticizes a recent decision of an Australian commission for health and medical research according to which 'nudge units' should receive funds for providing health prevention – as the only stakeholder outside the healthcare system: 'Nudge is the closest thing for someone who has a limited understanding of how you could change societal structures' (Intw6_ACA).

In contrast to such a narrow understanding of using behavioural insights for public policy, interviewees suggest additional targets and forms of BPP.

First, policy efforts to change individual behaviour should not be limited to the micro-level but also encompass behavioural biases that occur at the meso- and macro-level, i.e. changing the behaviour of policymakers and public servants. What is academically termed 'Behavioural Public Administration' (Grimmelikhuijsen et al. 2017) and 'Behavioural Government' (BIT 2018) are untapped variants of BPP, as reported: 'We wouldn't be logically consistent, if we were eager to apply behavioural insights for everybody but not to policymakers themselves' (Intw3_IO). Given the fact that policymakers have constantly to 'weigh the pros and cons of incredibly complex situations' (Intw5_ACA), decision-making processes would likely to benefit from behavioural insights. For example, the regular use of 'reference base cases' (Intw2_IO) that inform policymakers 'what happened in other contexts that are similar to their own context' (Intw2_IO) are deemed most valuable in order to come up with the best decision possible. Moreover, respondents expect a further push for BPP if behavioural insights are thoroughly applied at the level of public servants and welfare professionals. Building a robust 'infrastructure informed by behavioural science' (Intw7_BIT) at the level of policy

implementation and delivery is seen as a prerequisite to further establish and standardise the use of behavioural science. Furthermore, public administrations and professional associations may apply behavioural insights to optimise their own affairs, e.g. 'to debias recruitment procedures' (Intw2_IO) or to 'make it easier for professionals to adhere to guidance' (Intw7_BIT). In addition, a mandatory 'behavioural science training' (Intw1_ACA) for service-delivering staff would, in turn, help service users to achieve lasting behaviour change.

Second, it is recommended to apply behavioural insights in the shaping of collective and organizational behaviour. To 'actually influence organizational choice' (Intw4_ACA) in public policy requires to utilize the largely unexploited 'empirical science of how groups make decisions' (Intw5_ACA). Organizational behaviour, although being composed of accumulative human behaviour, significantly deviates from individual behaviour by being more structured, long-term oriented and less impulsive. Speaking in Kahneman (2011) terms, this means that you 'do not see a lot of system 1 thinking' (Intw3_IO) in organizations. Nonetheless, interviewees claim that 'there are behaviours within an organization that you can change' (Intw3_IO) through behavioural interventions. In the face of serious organizational failures, such as planning fallacies due to over-optimism in estimating construction time and underestimation of costs, advanced BPP would benefit by taking greater account of 'our old field of organizational psychology' (Intw3_IO). Drawing from insights from this subfield of behaviour science would allow to 'make government work in a coordinated and joined up way' (Intw2_IO) and to 'change the culture of organisations' (Intw3_IO). Likewise, behavioural insights may lead to a more constructive attitude towards mistakes that occur within organizations. If used to design indicators that incentivise rather than prevent to report risks, errors and accidents 'you can have a big impact on employees (…) but also more widely on the organisation itself' (Intw2_IO). To sum up: In terms of using behavioural insights, policymakers have just started to think 'how to translate what has been done for individuals to organizations' (Intw1_ACA). This is precisely where interviewees see much leeway to expand the application of BPP.

3.4 Implications for policymaking: 'the holy grail is to integrate better'

Much of the fuss and controversy about the current use of behavioural insights in public policy stems from the misleading assumption that nudge is as a stand-alone concept that is detached from other policymaking approaches and tools. Nonetheless, state-of-the art thinking on policy design argues that behavioural insights are an additional layer to the policymaking process, i.e. existing policy instruments are either complemented by behavioural tools or affected by a 'behavioural spin' (Loer, 2019). In particular, it is stated that policy responses to complex behaviours require 'a mix of policy tools to be deployed' (Howlett and Fraser 2018, 116).

Interviewees describe the integration of behavioural insights into the policymaking process by default as the most important and challenging task of future BPP. As reported, there is a discrepancy between concepts and ideas how to use behavioural insights when designing policies and the actual extent BPP is already intertwined with other policy approaches. Perceived as the 'most promising frontier' (Intw1_ACA) of BPP, interviewees virtually unanimously recommend to apply a behavioural lens on the policy design process in order to clarify 'what sort of problems do you have' (Intw9_ACA). Characterized as an often 'overlooked phase when designing policies' (Intw2_IO), problem scoping would much benefit from evidence on behaviours and preferences that ought to be changed. In this regard, strictly following the task sequence 'Target, Explore, Solution, Trial and Scale (TEST)' (Intw8_BIT) would allow policymakers 'to explore a problem and come up with possible solutions' (Intw5_ACA) in a systematic way. Thus, behavioural insights are described as a lever to 'really make sure that we're asking the right questions' (Intw8_BIT).

As turned out, policy integration remains to be BPP's unfinished business since the application of behavioural insights is too often 'not dressed up with something else' (Intw10_BIT). Hence, the theoretical assumption that 'combinations of interventions probably have a synergy effect' (Intw4) is hardly reflected in policymaking practice. In this context, UK's current obesity policy that applies behavioural insights in complementary with other policy tools such as the sugar tax is described as a rare exception (Smith and Topprakkiran 2018). Nonetheless, respondents assess the quest for 'comprehensive tools and frameworks' (Intw7_BIT) in behavioural policymaking differently. Nudge unit members assure that regulations and financial incentives could be applied in tandem with behavioural interventions to 'structure attacks in order to have the maximum impact' (Intw8_BIT). Other respondents doubt that such a smooth and seamless

integration of policy instruments and approaches is feasible due to very different 'ideologically and dogmatically beliefs' (Intw4_ACA) of policy camps. Generally speaking, advocates of behavioural and structural policy interventions often work in different government silos and 'do not talk to each other' (Intw4_ACA). As a result, developing a coherent BPP across sectors is far from a self-propelling process but has to be politically desired and closely monitored by governments. As suggested, policy integration is more likely to succeed if mixed teams across policy camps – that are directly 'accountable to the executive' (Intw4_ACA) – are commissioned to develop comprehensive policy approaches. However, it is reported that persistent ideological narratives – i.e. governments' attitude 'to tell people to change their behaviour and everything will be absolutely fine' (Intw10_BIT) – often prevent cross-sector cooperation to solve complex problems.

Finally, interviewees repeatedly stress that behavioural insights are no 'extra grade panacea' (Intw10_BIT) that substitutes 'stricter interventions – sanctions, legislation, spending money' (Intw4_ACA). Referring to health policies, a critical observer of current BPP stresses that behavioural interventions may 'one component but only if public health gets adequately funded' (Intw4_ACA). Moreover, it is point out that there is the impending risk that behavioural insights 'oversell its efficacy' (Intw1_ACA) and create 'false expectations' (Intw2_IO) among policymakers that all too easily 'buy into that sorts of stuff' (Intw10_BIT). This is especially true when facing complex policy problems that are 'not very intuitive, not easily articulated and doesn't capture political and public attention' (Intw10_BIT). Taken together, there is a good amount of sceptic whether advanced BPP will become similar prominent as nudge since it is neither an easy to communicate policy approach nor does it offer immediate remedy to policy problems.

4. Towards advanced Behavioural Public Policy

A key finding to be drawn from the interviews is that while the use of nudges have become mainstream, BPP remains to be a provisional concept that is still in the making. While there is a broad consensus that BPP differs from nudging and individual behaviour change, the cornerstones of advanced BPP, to be perceived as a 'whole systems approach' (Intw7_BIT), are still vague and require further conceptual shaping. Building up on the interview analysis, in

this section conceptual features of advanced BPP will be distilled and further elaborated. Second, it will be discussed whether the advanced BPP is better prepared to withstand the criticism on nudge tactics.

4.1 Using behavioural insights throughout the policy process

As shown in the previous section, experts on behavioural insights want to see a more versatile and useful application of BPP. In fact, especially experts who have been working with behaviour insights since the pre-nudge age are dissatisfied with a too narrow notion of using behavioural insights, as stated within a central interview quotation:

‚I'm probably one of the people who is less sold on the core impulsion to behavioural insights than some of my colleagues because I, everything I see that comes from the behavioral insights unit, which used to be part of government, and is no independent allegedly, looks to me just like not dressed up with something else. And I think for me that's a challenge to behavioral insights, people to say or to prove that there is more behavioral insights than nudging people.' (Intw10_BIT)

In order to exemplify the difference of an advanced BPP and nudge, its conceptual features have to be sketched out (for an overview see Table 3 in the appendix). With regard to the scientific footing of both approaches it is a simply, though often overseen, fact that nudge has emerged from behavioural economics (which is a strand of social sciences), while BPP, at least in theory, draws more broadly from 'behavioural and social sciences, including decision making, psychology, cognitive science, neuroscience, organisational and group behaviour' (OECD 2017, 3). However, contributions to BPP beyond behavioural economy remain grossly underutilised so far; this concerns foremost insights that explain how behaviours are embedded in and shaped by environments and life worlds. In this respect, e.g. social identity theory, a social-psychological approach, offers a more in-depth explanation for lasting behavioural change that is based on the internalisation, rather than the strategic exploitation, of social norms (Mols et al. 2015). Moreover, insights from anthropology may be used to understand cultural roots of certain behaviours. For example, choice architectures related to food displays are ineffective and problematic, if people's diverse eating habits and cultural traditions are not

taken into account. Methodologically, advanced BPP seeks to combine quantitative and qualitative research in a mutual reinforcing way. While RCTs are deemed indispensable to conduct large-scale experiments, qualitative methods allow to explore the social context in which BPP should be applied (van Bavel and Dessart 2018).

The second feature concerns the scope of behavioural policymaking. As criticized, nudge is a selective intervention to be applied at the stage of policy implementation; in contrast, advanced BPP suggests to use behavioural insights, as a kind of universal means, at every stage in the policy process – from problem scoping and definition, policy design and implementation to policy evaluation. Thereby, the behavioural component of policymaking could take different forms: The stage of problem scoping and definition may benefit from qualitative studies that investigate people's behaviour in social contexts (rather than in laboratories); whereas behaviourally-informed policy design requires to consider evidence on human behaviour (i.e. *How does people respond to certain policy instruments?*) when 'matching policy tools and their targets' (Howlett and Fraser 2018); while nudges may be deployed to facilitate policy implementation, though other behavioural approaches such as 'budges' (Oliver 2015) and 'boosts' (Hertwig and Grüne-Yanoff 2017) could play a vital role too at this stage; finally, it is up to a behaviourally-informed policy evaluation to examine *what works* and what not.

Having said this, third, behavioural insights could be used to reach different policy aims; hence, rather than be restricted to obtain individual behaviour change, advanced BPP may fit multiple purposes (e.g. using behavioural insights to inform the selection of policy tools). Linked to this, fourth, there is an extension of the targets of behavioural interventions: Advanced BPP seeks to influence the behaviour of every stakeholder in the policy process, including policymakers, public servants and organisations. Fifth, advanced BPP could *contribute* to solve more complex policy problems. For example, smarter lunchrooms (Wansink 2014, 101), designed to nudge students towards healthier meal choices are of little help, if schools are located within 'food deserts' (Shaw 2014) that deny access to healthy food and may have a much bigger impact on students' health than school meals (Ewert 2017). Nonetheless, it is in those settings in which behavioural insights could be a valuable component of more comprehensive policy strategies: Evidence on people's food preferences and shopping habits are a good starting point to design

behaviourally informed interventions that work in combination with traditional policy tools such as the regulation of food producers and retailers or subsidies for healthy foods.

4.2 Advanced BPP – a participatory, ethical and non-ideological policy paradigm?

Since advanced BPP is not established yet, statements whether the concept is able to refute major criticism on the application of behavioural insights in policy (see section 2.2) have to be considered as provisional. At this stage, it can be concluded that while some of the conceptual and methodological reservations are addressed by advanced BPP, other criticism exists further or is even reinforced.

By reconsidering the conceptual criticism on nudge (i.e. too narrow, technocratic, elitist and top-down), efforts to broaden and *ground* BPP become visible. In this regard, the recent concept of 'nudge plus' (John 2018; John and Stoker 2019) reads as manual of good practice by 'recognis[ing] that effective nudges work alongside other influences (…), not as a standalone policy, but rather as mechanism for helping deliver behaviour change alongside other tools of government' (John and Stoker 2019, 217). Also John's (2018, 132) claim for 'long-term relationships between the individual and the public agency', allowing reflection and feedback from the side of the citizens as a basis for BPP, may placate critics. On the other hand, there is not much empirical evidence on nudge plus interventions yet. While Feitsma (2018) discussed innovative Dutch nudge initiatives that are developed and owned by citizens, the overall picture looks less promising. Furthermore, it is very likely that criticism may be reinforced, if behavioural insights will be frequently applied *throughout the policy process*. One could legitimately object that anyone who is worried about nudging will be even more worried about 'a whole systems approach' (Intw7_BIT) that allows a more radical use of behaviour science. Thus, the need for citizen control and participation may rather increase than decrease as a result of advanced BPP.

Theoretically, the methodological criticism on nudge will be mitigated by advanced BPP. Qualitative methods – interviews, participatory observation or focus groups – could complement and revitalise experimentation for BPP (Lunn and Robertson 2018). They are particularly relevant to develop a nuanced understanding of social settings and the behaviour

of certain groups and, hence, may help policymakers to deploy context-sensitive BPP rather than a 'shotgun approach' (Hansen 2018, 195). However, given the general imbalance between quantitative and qualitative research in academia, breaking the supremacy of RCTs in BPP seems to be a mammoth task; especially, if one considers BITs' enormous expertise and capacity to apply these techniques in the most efficient way. Put in somewhat provocative terms: How likely is it that BITs will be infiltrated by critical sociologists or anthropologists? and, if so, Will their voices be valued by leading behavioural economists? Both would be indispensable to cease the current methodological monism in BPP practise.

To reconcile advanced BPP and ethical concerns is even more difficult. It is no coincidence that BPP advocates have recently published a 'Bill of Rights for Nudging' (Sunstein and Reisch 2019, 128) and 'Behavioural Insights Toolkit and Ethical Guidelines for Policy Makers' (OECD 2018). Apparently, there is consensus that if BPP should become a standard component of mainstream policymaking, a basic agreement on its ethical foundations needs to be reached. Though, the academic debate on ethics in BPP that goes beyond nudge has just begun (see as an introduction: Lepenies and Małecka 2019); for now, it can be concluded that the variety of ways to apply behavioural insights to different sectors of public policy requires specific and context-sensitive ethical standards. In this view, the OECD's (2018) basic toolkit is a laudable step since it suggests practical ethical considerations (e.g. 'demonstrate the necessity of experimentation' and 'monitor for long-term and side effects') to be applied at each stage of the BPP process; nevertheless, BPP's general acceptance would be much more stronger if those guidelines would have been formulated by an independent and civil society-based agency that is not itself a promoter of BPP.

Finally, the ideological criticism needs to be revisited in the light of advanced BPP. Foremost, 'separating the normative from the positive aspects of behaviourally informed policy design' (Kuehnhanss 2018, 19) seems to be critical. Most interviewees are dissatisfied with the politicized and partly ideological zeal with which behavioural insights have been adapted to public policy in recent years. Accordingly, the sheer existence of a behavioural intervention may make policymakers feel like 'they do not have to do anything else' (Intw1_ACA), especially if one takes into account that in line with ideological criticism policymakers tend to shrink from more regulative policy interventions. It is unlikely that policymakers' general

appetite for easy-to-communicate behavioural solutions will suddenly switch to an attitude that regards behavioural approaches as one component within mixed policy strategies. As a start, the debate on behavioural insights requires depoliticization and an rebuttal of unrealistic expectations accompanied to BPP. Besides evidencing what BPP can achieve and what not, citizen-owned examples of behavioural interventions ('nudge plus'), tested and promoted by non-governmental organizations (Feitsma 2018), bear the potential to revitalize public policy by making it more responsive and tailored to public needs. A less ideological notion of BPP may also reconnect to former debates on behavioural change approaches. For example, in 2004 Halpern et al. (2004, 4) came to the conclusion that '[t]o be effective and acceptable, such approaches need to be built around co-production and a sense of partnership between state, individuals and communities.' Rather than a political project to increase individual responsibility, behavioural change was then perceived as a common task to be reached by *co-production* – to be perceived as a civic-minded policy paradigm to renew state-citizen relations and public service delivery by putting a strong emphasis on participation and dialogue (Brandsen et al. 2018). Since co-production concerns the design and implementation of services, it may serve as a blueprint to jointly develop future BPPs. Reconciling both paradigms – behavioural insights and co-production – and its academic and practice communities would be a first step to strengthen the legitimacy and ideological foundations of advanced BPP.

5. Conclusion

Since behavioral insights have been systematically applied in public policy more than a decade ago results are mixed. On the one hand, even critics of behavioural approaches would certainly agree that '[p]roof of concept has definitely occurred' (John and Stoker 2019, 210). On the other hand, despite the global proliferation of nudge units, it remains an open question 'why behavioural insights have not become more deeply integrated into public policy' (Hansen 2018, 191). In this paper, it has been argued that a narrow and opportunistic understanding of behavioural insights' role in public policy – expressed in the dictum to *nudge individual behaviour* – prevents both, the full unfolding of behavioural insights in policymaking as well as serious efforts of policy integration. Against such a one-sided and one-dimensional use of nudge tactics, an advanced version of BPP has been outlined. Thus, behaviourally informed

policymaking could be defined as a potentially pluralist, non-deterministic and multipurpose approach that requires, above all, to adopt a behavioural lens. As argued, such a view considerably extends the scope of BPP since each phase and every aspect of the policy process could be disassembled into its behavioural parts. In consequence, not only unwanted behaviour of citizens may become addressed by BPP but also the behaviour of public administrators and organisations. Likewise, an advanced BPP seems more suitable to respond to complex problems that entail behavioural and structural dimensions. However, to restore confidence that has been lost by nudge advanced BPP has to engage seriously with the essence of the criticism on behavioural insights. A necessary precaution in this regard is to anchor BPP as a multi-stakeholder concept that is not exclusively owned by policymakers but co-shaped by citizens and non-governmental organizations.

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Appendix

Table 1: Key interview questions

1.	How do you define the state of the art of using behavioral insights?
2.	Which policy problems are currently addressed through behavioural interventions? Which not?
3.	Which stages throughout the policy process could be informed by behavioral insights?
4.	How does BPP relates to other policy approaches and instruments? Are there signs for policy integration?
5.	What are your predictions for the future of BPP?

Table 2: Coding framework and frequency of codings

Code	Frequency	Percentage
Policy integration	53	9,11
Health policy\Approaches	50	8,59
Health policy\Applying BPP to health	42	7,22
Realm of BPP\Evolution of BBP	35	6,01
Realm of BPP\Policy design	34	5,84
Nudge Units	34	5,84
Nudging policymakers\Nudging professionals	30	5,15
Policy experimentation\Methods	28	4,81
Limits of BBP	25	4,30
Realm of BPP\Philosophy	25	4,30
Realm of BPP\Policy experimentation	21	3,61

Realm of BPP\Future of BBP	21	3,61
Future of BBP\Scope of problems	19	3,26
Collective behaviour\Organizational behaviour	19	3,26
Realm of BPP\Collective behaviour	18	3,09
Realm of BPP\Nudging policymakers	18	3,09
Behavioural science	18	3,09
Policy design\Examples	17	2,92
Policy experimentation\Use of evidence	14	2,41
Behavioural Science\Realm of BPP	12	2,06
Health policy\Social determinants of health	9	1,55
Realm of BPP\Standardization processes	9	1,55
Behavioural Science\Behavioural economics	7	1,20
Realm of BPP\Citizen engagement	6	1,03
Policy evaluation	5	0,86
Evolution of BBP\Application fields	5	0,86
Citizen engagement\Examples	4	0,69
Social determinants of health\Health inequality	4	0,69
TOTAL	582	100,00

Table 3: Characteristics of nudge versus advanced BPP

	Nudge	Advanced BPP
Scientific and methodological footing	Behavioural economics; Quantitative methods (mostly Random Control Trials)	Behavioural and social sciences; Mixed (i.e. qualitative and quantitative) methods
Scope and level of policy integration	Selective intervention ('technocratic tweak'); Low ('stand-alone concept')	Whole systems approach High (applied throughout the policy process)
Approaches and instruments	Nudging	'Applying a behavioural lens'; nudges, nudge plus, boosts etc.
Targets	Individual level: Citizens, consumers and end-users	Individual and collective level: All stakeholders (incl. policymakers, public servants and organisations)
Policy goal	Individual behaviour change	Multipurpose
Scope of problems	Low ('low hanging fruits')	Wide
Example	Changing of choice architectures in canteens ('Smarter lunchrooms')	Making food supply in urban settings more sustainable through collective action ('settings approach')