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The Learning State: Essays on Public Administration in
Representation and Accountability

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Abstract

Arguing that cognition – especially acquiring knowledge – in representative government is underexamined compared to agency in an environment characterized by democratic deficits, de-centered governance, turbulence and social inequity, this dissertation reimagines public administration (PA) as the state's 'peripheral nervous system' in a theoretical perspective of learning through administration from accountability processes initiated by members of the public. Existing accountability research emphasizes top-down, control perspectives, overlooking the potential for accountability's deliberative and constructive roles, while learning accountability scholarship often focuses on high profile events. I offer a more systematic theorization and exploration of state learning from more mainstream challenges like complaints, appeals and litigation brought by citizens as affected individuals, which I term 'civic challenges' to emphasize them as a form of voice and citizen-state interaction. Drawing links between PA and democratic theories, a theoretical essay conceptualizes civic challenges as *noisy democratic data*, with administration occupying a unique position which may facilitate learning in representative government through *civic challenge stewardship* and *interpretive responsibility*. Three empirical essays follow which further explore and elaborate the perspective with qualitative and mixed methods applied in the context of English and Welsh policing. The first explores how civic challenges are interpreted in police forces. Through abductive analysis of 43 interviews with police insiders I contribute a multi-faceted framework which sheds light on plural, competing normative dispositions towards civic challenges, revealing learning as having 'proprioceptive' purposes of protection, stabilization and control through knowledge the public organization acquires about the public and itself in processing civic challenges. Interpretive activities included engaging with complainants and officers, sharing and consulting with internal and external stakeholders and emergent or established theming of data. A mixed-methods empirical essay explores and tests organizational conditions—especially workforce social diversity—favoring or constraining learning as understood by police. *Lesson salience and integrity* as viewed by frontline officials emerges as a novel learning condition. This highlights that the action-cognition separation inherent to ex-post accountability arrangements is a defining feature of learning accountability, offering a new way of understanding—and perhaps overcoming—the oft-stated but underexamined blame-learning tension in organizational learning theory. Testing bureaucratic-political hypotheses about diversity conditions for learning from discrimination and other complaint types with novel panel data finds greater association of 'learning' with higher workforce shares of minorities, attenuated with higher social group fractionalization. A fourth essay (with Valentina Mele and Sonia Ospina), uses interpretive narrative analysis of archival sources and over 50 interviews with civil society, policy experts and police to study an innovative social accountability arrangement. We find orchestration of safe intra- and inter-sector platforms and brokering roles of civil society and public organizations may help to promote collective identification of systemic, social equity issues in public policy and administration, leading to sustained attention if not collective accountability for addressing the issues. Overall, the dissertation contributes a novel perspective on PA's role in long-growing democratic deficit concerns and offers early empirical insights into how PA may foster learning from civic challenges, an important, underexplored class of accountability pressure and citizen state interaction.

For my family

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The Learning State

Essays on public administration in representation and accountability

Rebecca A. E. Kirley

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Bocconi University

Essay 1.

Learning from civic challenges in service of representation: a new perspective on public administration

Essay 2.

Interpreting noisy democratic data: an exploratory study of English and Welsh police organizations

Essay 3.

Workforce diversity and organizational conditions for learning accountability: a mixed-methods study of complaints against the police

Essay 4.

What seems to be the problem? Exploring cross-sector arrangements for social accountability

with Valentina Mele (Bocconi University) and Sonia Ospina (New York University)

* * * *

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The Learning State: Essays on public administration in representation and accountability

The administrative staffs are not isolated from the social forces in the country either to the degree or in the manner assumed by the apologists for a managerial revolution [...] They are in fact likely to be as closely in touch with the general public, and with the pressure groups which compose it, as are most Members of Parliament. In the daily course of administration they observe the reactions of the people firsthand and acquire political wisdom in the process.

Donald Kingsley, *Representative Bureaucracy* p.266, 1944

0. Introduction

Different varieties of governance and administration abound in the modern state, but delegated or de-centered arrangements (Rhodes, 2007; Sørensen and Torfing, 2017) remain challenging to reconcile with democratic understandings of representative government – or the legitimacy of authority conferred when the people collectively select centralized decision-makers through elections. In trying to address imperfections of representation as a proxy for democracy, various governance arrangements introduce imperfections of their own (Lafont, 2019), as non-ideal solutions in a non-ideal system.

This dissertation is motivated by a curiosity to gain a deeper and more coherent understanding of how the state acquires and uses knowledge from and about the public(s) it serves and affects, outside of elections, and in light of long-growing concerns about democratic deficits (Papadopoulos, 2007; Pitkin, 2004; Norris, 2011; Rhodes, 2007) and social equity (Fukuyama, 2018) which have accompanied the decentering of

public governance. The broader questions orienting the dissertation are thus: how does the state acquire and use knowledge about the public served and affected when agency is decentered? And how can it do so in a democratically legitimate way? I look specifically to public administration – as the ensemble of actors within representative government who are in close contact with the public through citizen-state interactions and as a consequence of de-centered agency – to explore these questions.

A nervous system analogy is a useful way of justifying a focus on public administration in the broader question of how representative government acquires and uses knowledge. In particular, we may compare the cognition and agency of *octopuses* to those of humans. Octopuses have more distributed nervous systems compared to humans, with two-thirds of their neurons in the peripheral nervous system and one-third in the central nervous system (Gutnick, Zullo, Hochner and Kuba, 2020). While humans have some degree of grounded cognition (the idea that the “body’s own structure encodes some information about the environment and how we must deal with it”, Godfrey-Smith, 2018, p74), in the octopus it is more pronounced, leading it to think and act through a combination of “localized and top-down control” (ibid, pp66-68). The distinction and interaction between centralized and peripheral nervous systems, and the idea that the peripheral is much more important for ‘thinking’ and acting in other species than in more human conceptualizations (dating as far back as Hobbes’ enduring ‘artificial man’ metaphor for the state in *Leviathan*) would appear to lend themselves well to the modern, de-centered picture of the state. Considering the peripheral and central nervous systems as loosely analogous to administration and authorized representation, respectively, I pose the research question: *what, if anything, does the*

state learn about the public through administration, and how? I seek to address these questions in a way which reconciles a role for public administration which is democratically legitimate.

Different governance arrangements tend to be treated in distinct subfields of public administration theory and empirical research. There has been limited engagement between public administration and democratic theory and research, a gap which has recently begun to be addressed by scholars from both perspectives. For instance, Heath (2020) points to a more general lack of attention in democratic theory to public administration, while Lafont (2019) critiques numerous governance arrangements including minipublics and delegation to experts as ‘democratic shortcuts’. On the public administration side, Bertelli (2021) categorizes prominent agency structures and draws them together into a coherent democratic picture by theorizing them as entailing fundamental trade-offs between accountability and process values, respectively.

In Essay 1, I build on arguments alluded to above that existing perspectives in democratic and public administration theories underline that elected mandates and the directions of elected representatives are only one part of the picture for how agency is exercised, while various governance approaches explicitly seek to fill in the gaps with respect to clarifying public preferences and interests, including participatory or collaborative arrangements or representative bureaucracy. Through a dialectic critique of democratic and public administration theories, I argue in Essay 1 that a more coherent account of *where knowledge comes from* is lacking across both, and this serves as a justification for a learning theoretical perspective in which public administration, learning from accountability processes which arise from citizen-state

interactions, is central. Meanwhile, extant theory and empirical contributions relating to learning accountability are less developed than top-down, incentive-design perspectives on accountability (Schillemans and Smulders, 2015) and are nowadays associated largely with learning for managerialist aims of performance improvement (Bovens, Schillemans and 't Hart, 2008).

There are thus two gaps the dissertation seeks to address: the broader disconnect between public administration and democratic theory and research, in which I argue that knowledge acquisition to better understand the public served is under-examined in each, and the nascent learning accountability literature. Addressing these contributes a new perspective which may help in understanding and evaluating – in positive and normative terms – public administration's roles in decision-making on the basis of knowledge about the public served or affected by government work, and in improving institutional design and reform along these lines. For example, I use the learning perspective to argue in Essay 1 that active representation in representative bureaucracy theory relies on a form of endowed knowledge (that is, hiring a workforce with a certain social composition as a means of shaping decision-making) which is not transparent, in contrast to other approaches for bringing in knowledge of the public which may be at once more dynamic and easier to account for.

Indeed, in line with Schattschneider's (1960, p71) "mobilization of bias" portrayal of political organization, in which "some issues are organized [in] while some are organized out", we may consider that *all* governance arrangements from traditional hierarchy to network or collaborative governance necessarily impose or generate filters – of different types and degrees – of information and understanding in public decision-

making. As such, I argue that we should take information or data about the public as an analytical starting point, rather than different governance arrangements, and examine how such information can be mediated into public decision-making. This can help us to analyze such questions as which arrangements are more or less open to emergent public problems, and how. This 'data-first' conceptual orientation connects with an expanding, multidisciplinary body of scholarship and practice on 'collective intelligence' (Boucher, Hallin and Paulson, 2023; Landemore and Elster, 2012). It also speaks to the general call by Jakobsen, James, Moynihan and Nabatchi (2019) for public administration to adopt them as a 'central organizing principle' (p.e10) in recognition that citizens are the "ultimate evaluators of administrative outcomes", with the citizen-state relationship suffusing "all stages of the policy process" (p.e8).

By building on the nascent empirical literature on learning accountability, the dissertation will also aim to further understanding of the potential for more deliberative and constructive roles for public accountability through its learning, as opposed to control and sanction, purposes (Olsen, 2013). In Essay 4, co-authored with Valentina Mele and Sonia Ospina, I present an exploratory study of a novel collaborative arrangement for social accountability which effectively abstracts away from the single citizen-state interaction, lifting the burden of challenge for individuals impacted (to be carried by civil society organizations) and away from the threat of individual blame and sanction, through a cross-sector pursuit of social accountability for what *is* and collective responsibility for what *should be*.

To address the overall research questions, the dissertation puts forward a theoretical essay followed by three empirical essays based on the context of UK policing. This empirical context reflects the broad trends towards 'de-centered' governance over recent decades (Rowe, 2020, pp119-120; Reiner, 1992; 1995) and has seen reform efforts to reorient its accountability system to put more emphasis on learning, away from individual blame and sanction. I focus on a single country and policy area context in recognition of the complex and multivalent processes and perceptions of civic challenges, their handling and effects. Policing has high variance in civic challenge types (Prenzler and Porter, 2015), ranging from incivility, operational decisions and policies to serious injury and death. It represents an extreme theoretical case for elaborating the present theoretical perspective. The intention is to extract more systematic insights than currently exist in general from this theoretical case to build a structured basis on which future quantitative and comparative analysis, including systematic reviews of existing studies relating to civic challenges in field literature, might build.

Essay 1 draws links between public administration and democratic theory, arguing that civic challenges represent noisy, democratic data which representative governments can learn from, with administration occupying a unique structural position in facilitating or preventing the identification and sharing of themes or lessons from civic challenges with the public and with representatives. Essay 2 poses the research questions: *How are civic challenges interpreted and handled within police organizations?* and *Why do police organizations try to learn from public complaints, and what can they learn?* It presents an exploratory, abductive analysis of 43 interviews with police force insiders in

England and Wales across a range of roles and seniority levels on how civic challenges are collectively interpreted in police organizations and what organizational insiders believe can be learned from them. It contributes a multi-faceted descriptive framework which sheds light on the plural and competing internal dispositions towards civic challenges, interpretive activities and dimensions and *what* can be learned. Essay 3 builds on the police interview corpus, using a sequential mixed methods research design to explore and then test organizational conditions which favor or constrain learning as understood by internal police actors. *Workforce social diversity* is explored in particular as a potential condition for learning. A novel panel data set drawing together statistics from a range of sources, and covering the period 2011-2018, is used to test hypotheses about workforce diversity conditions for organizational learning. Finally, as individual accountability mechanisms, civic challenges may be limited in what they can reveal about systemic issues in public governance and service delivery. Essay 4 uses interpretive narrative analysis of documentary analysis and over 50 interviews with civil society organizations, policy experts and police officers to study collaborative arrangements for the identification of systemic issues in public services.

As noted above, Essays 2 and 3 draw on a common set of 43 interviews. Essay 2 investigates themes in perspectives and internal approaches for dealing with and interpreting civic challenges in public organizations, of which learning is one. It emphasizes the lived experience of interviewees. This is in recognition of the multivalent nature of civic challenges, both in their specific instances and as a type of external pressure on organizations, including the contested existence and normative goal of learning in practice and in scholarship (Torrible, 2020). Meanwhile, Essay 3 adopts a

more positivist perspective, focusing squarely on participants' conceptualizations of organizational learning from civic challenges and using the interview corpus to identify and inform operationalization of organizational conditions for learning in the quantitative analysis (Belardinelli and Mele, 2020 p36). It centers especially on the constructs of workforce social diversity and organizational candor (a concept I identify at the intersection of diversity and learning in the literature, see for instance Ely and Thomas, 2001; Moynihan and Landuyt, 2009, p1100), to explore diversity in detail as a potential learning condition. The different uses of the interview data are reflected in the essays' respective research questions, the areas of literature they each contribute to, and the different parts of the interview protocol employed in each essay, as illustrated in Appendix 3.1.

The main findings are as follows. Learning from civic challenges emerges in Essay 2's abductive analysis of internal police perspectives as having various purposes which may be understood primarily with an evolutionary lens, including increasing internal control, minimizing risk and damage to the organization, preventing and minimizing harm to the public and to officers, and aligning the organization with external institutions, actors and the public. Borrowing from biology, in extending my nervous system perspective, I denote these latent themes in learning purposes as *proprioceptive*, or relating to a public organization's sense of its position and posture in its societal and institutional environment. As a disposition towards civic challenges, (proprioceptive) learning emerged alongside a number of normative dispositions—bureaucratic, legal, public-centered, social and managerial – which reflect classifications found in socio-legal scholarship like Adler's (2006) models of administrative justice.

Such models are characterized in that literature as having central legitimating aims (like procedural accuracy, legality, or public confidence) and corresponding modes of decision-making. I argue that learning instead represents a *signal tuning* orientation which may apply within one or more of the plural and competing normative dispositions towards civic challenges. As such, learning is an alternative lens with respect to a *signal blocking*, defensive orientation – or an organization which is unintentionally ‘ignorant’ in the face such external stimuli (perhaps through lack of capacity). However, the findings also indicate that learning may often have defensive motivations. The loose, resultant framework offers analytical means for moving beyond the oft-stated yet under-examined tension or dichotomy between learning and blame avoidance in literatures on learning accountability, and also in practice, through suggesting a contingency approach to learning systems and reforms which accounts for administrative decision-making models, environmental, ‘evolutionary’ factors or the specific motivations behind ‘signal tuning’ or ‘blocking’.

Another main finding of the second essay is that civic challenges are perceived as being a source of a range of knowledge types. Besides the more prosaic ‘knowledge of process and system gaps’ are those of broader social and political significance, including new or updated knowledge about the public – one more generalized (‘public understandings and expectations’) and two more specific or identity group-based (‘vulnerabilities and risk factors for harm’ and ‘cultural differences and sensitivities’). This signals the political character of organizational learning from civic challenges (complementing contributions regarding the internal political dimensions of organizational learning more generally, Bristow, Tomkins and Hartley, 2022).

Knowledge types also include organizational self-knowledge, for instance about front-line officers' beliefs, assumptions or behaviors, and clarification or emphasis of the organization's external gaps with law or directions down the chain of command.

For publication, the multi-faceted taxonomy presented in Essay 2 may be developed into a more integrated evaluative or analytical framework. In the absence of existing, overarching taxonomies or frameworks for describing how this important class of citizen-state interaction is perceived and handled in public agencies, the essay is presented as a distinct element of the dissertation which contributes greater structure to our understanding of the messy and complex reality of civic challenges, as well as greater nuance and appreciation of their informal dynamics beyond what formal administrative justice procedures may reveal. The elements are connected in the essay's discussion to different areas of public administration and organizational literature where they might be fruitfully engaged in future research.

A novel learning condition identified in Essay 3's qualitative analytical phase is *lesson salience and integrity*, which refers to the relevance, trustworthiness and 'wholeness' of new knowledge to be integrated at the front line. This focuses attention on how to bridge the wedge between action and cognition which is often necessitated by control and assurance aims of accountability systems and processes, to incorporate the implementing actors (especially frontline officials) in the interpretation of issues and the search for solutions. Where judicial or even quasi-judicial actors may struggle to overcome this divide in issuing or mandating reforms for administrations, given their necessarily limited insight into the implementing authority's context as external authorities (Gill, 2018), public organizations themselves may be in a unique position to

experiment and try to ‘bring along’ those who will ultimately implement organizational reforms stemming from accountability processes. Meanwhile, different parameters of the complex relationship between learning from civic challenges and diversity emerge, including social-psychological and bureaucratic-political dynamics. A quantitative analysis tests hypotheses derived from the qualitative analysis for each set of dynamics, including the concentration of different demographic groupings across functions within police organizations (as a proxy for organizational candor; as a test of social-psychological dynamics) and social fractionalization and passive representation of minorities at the organizational level (testing hypothesized bureaucratic-political dynamics). The analysis uses a novel panel dataset compiled from a range of administrative sources, regarding England and Wales’s 43 territorial police forces over the period 2011-2018. It finds cautious support for a representative bureaucracy-style hypothesis that police organizations with a higher presence of minorities in their workforces are likelier to ‘learn’ from recent upticks in minority-salient complaint types like discrimination. Meanwhile, identity group ‘fractionalization’ appears to have a moderating effect on learning (supporting the notion of a group-based competition dynamic of learning accountability). Contrary to expectations, social group concentration within organizational function was positively and significantly correlated with learning, suggesting that the political perspective on learning accountability could have greater explanatory power (where concentration may aid group-based internal organizing and reform efforts, for example) than the social psychological perspective (in which more ‘uniform’ diversity is a proxy for an organization’s cultural candor).

The practical implications of these findings for public administration and policy are as follows. Different systematic descriptions of how civic challenges are interpreted offer potential frameworks for administrations looking to introduce or increase learning to better understand the baseline in their organization in terms of internal perceptions and trust in the data and processes associated with civic challenges, or with assessing the substance of their 'corpus' of civic challenges. For instance, an organizational learning officer or department may make more effective reforms to learning systems and processes if they know that the workforce has more negative, neutral or positive perceptions of the civic challenges the organization encounters, or if the dominant normative frames on what civic challenges are for is clearer.

By identifying three main types of interpretive activity (engaging, sharing and consulting, and theming), practitioners or other oversight actors have a more structured way of assessing formal and informal practices and processes in use for the interpretation of civic challenges as data. This may be helpfully combined with knowledge about the (perceived) qualities of the civic challenge corpus to experiment and identify best practices. For example, what sort of approaches to *engaging* with complained-about officers result in higher trust in the complaints process in the workforce? What approaches to sharing or consulting with the public best enhance equal trust and use of civic challenge mechanisms among citizens? Meanwhile, oversight actors (whether public agencies or citizen, civil society oversight) might be in a better position to evaluate how (and how well) a public body is interpreting civic challenges, either as individual cases or as trends in cases. For example, do those with interpretive

responsibility consult or share information about civic challenges with the 'right' parties to reach a reasonably informed and impartial judgment?

Returning to the octopus analogy, in *Intelligent Minds* Peter Godfrey-Smith (2018, p72) describes how a “large nervous system evolves to deal with coordination of the body, but the result is so much neural complexity that eventually other capacities arise as byproducts, or relatively easy additions.” In the spirit of proposing the dissertation’s theory and findings in “design terms”, as encouraged by Moynihan (2022, p277), a final, practical aim of this dissertation is to encourage the intentional development of capacities for responsible, plural and accountable interpretation and learning from civic challenges within public bodies and policy networks.

1. Learning from civic challenges in service of representation: a new perspective on public administration

1.1 Introduction

Democratic deficits and social inequalities are long-growing concerns in modern states with representative government (Papadopoulos, 2007; Pitkin, 2004; Norris, 2011; Rhodes, 2007). Public administration has been exploring and experimenting for some time with governance innovations which might mitigate limitations of elected representation, particularly as minority interests are concerned, and more recently there has been a social equity turn in academic inquiry (Pandey et al., 2022; Riccucci and van Ryzin, 2017). These non-ideal mitigations are often themselves not ideal when judged against democratic norms, for example giving unequal decisional power or influence to a small subset of the population or to administrators. Christina Lafont (2019) describes such shortcomings as ‘democratic shortcuts’. This essay proposes *learning from civic challenges in service of representation* as a novel, alternative perspective on a role for public administration – legitimate under democratic theory – in questions of democratic deficits and social inequality.

I adopt the term ‘civic challenges’ to refer to all forms of challenge or call to account which members of the public—or civil society on their behalf—may bring against actions or omissions of policy work which have affected them or their beneficiaries, respectively, and which public actors are formally bound to engage with. The mechanisms channeling such challenges, which include complaints, appeals and litigation, have seen little cohesive treatment within the field of public administration (cf. Burgi, 2020 p151; Chanin, 2014). While such mechanisms are more commonly referred to as

redress, grievance, dispute resolution or administrative justice procedures, I adopt the term civic challenges in an effort to focus attention on what *activates* such mechanisms, namely citizen voice¹, and a specific type of voice which challenges or calls to account some alleged action, omission or decision rendered by delegates of representative government; namely administrative actors.

By denoting such challenges as *civic*, my intention is to define them as a special class of citizen-state interaction, and to recall concepts commonly invoked in definitions of 'civic' as "relating to citizenship or to the rights, duties, etc., of the citizen" And "Of, belonging to, or relating to a [...] community of citizens; [especially] of or relating to the administration and affairs of such a community" (Oxford English Dictionary, n.d.). This essay emphasizes two features of civic challenges: first, as external pressures which public actors must reckon with in some way, and second, as noisy data about the public.

I argue that the initiative of members of the public in bringing civic challenges makes them democratically significant; especially interesting where pluralism, marginalized interests and policy turbulence are concerned, and distinct from existing approaches which seek to 'bring the public in' on the basis of top-down or chronological partitioning of issues. It is here that I argue public administration is in a unique position to *serve* representation by facilitating state and societal learning. Learning accountability is recast in democratic, rather than managerial, terms, expanding on the notion that "accountability, in a general sense, is interest representation through administration" (Bertelli, 2004 p30).

¹ Where I use the term 'citizen', it should be understood under an 'all-affected' principle (Warren, 2014) rather than legal citizenship.

Adopting a dialectical inquiry approach (Hartley, Ongaro, Quick and Schröter, 2023), I first consult democratic and public administration theory to discuss two prominent solutions to the question of PA's role in democratic deficits in theory and practice, which I refer to as surrogate representation and discipline and control accountability, respectively. I then set out the theoretical perspective of learning from civic challenges in the service of representation. The perspective separates the scope or fields of learning into administrative, public and representative domains. I elaborate on the administrative learning domain in more detail, as I argue that what happens there will shape what learning may happen outside of it. I briefly discuss the public and representative domains before concluding with a research agenda.

1.2 Public administration's role in democratic deficits – a comparison of PA and democratic theories

Hanna Pitkin (2004) expressed doubts regarding the ability for representation – with its tendencies towards elitism – to enable large-scale democracy². However, she maintained that “genuinely democratic” representation is possible where the “centralized, largescale, necessarily abstract representative system is *based in* a lively, participatory, concrete direct democracy at the local level” (ibid, p340, emphasis added). Problematizing this claim, we might ask: what forms the link between the concrete and local, and the abstract and centralized? Two broad mitigations to the representation-democracy gap are found in public administration literature, cleaving along the lines of the classic Friedrich-Finer debate regarding whether administration should responsibly exercise discretion or be better controlled. I refer to the sets of solutions loosely as

² “Arrangements we call ‘representative democracy’ have become a substitute for popular self-government, not its enactment”, Pitkin, 2004 p.340.

'surrogate representation' and 'discipline and control accountability', respectively. I discuss each of these before arriving at an argument that a representative's *knowledge* of who and how to represent is a fundamental aspect of this link and may arise through accountability, with a unique role for public administration in fostering and mediating *learning* about the public and its interests.

Surrogate representation includes mechanisms like participatory budgeting, mini-publics (Fung, 2015) and collaborative governance (Ansell and Gash, 2008), which intend to 'bring the public back in' to collective decision making through deliberative or participatory devices. Political philosopher Cristina Lafont (2019) offers a critique of such initiatives as 'democratic shortcuts' – representation can only be legitimate if it is authorized (i.e. based on elections) under standard democratic perspectives (Pitkin, 2004). This section extends the democratic discussion of such arrangements, including representative bureaucracy— a prominent subfield in public administration literature which seeks to "supplement" democratic representation through the social background of administrators (Bradbury and Kellough, 2011 p158).

Other perspectives see democratic deficits as a problem of accountability. For Papadopoulos (2007), problems with democracy arise through a lack of democratic accountability of network governance structures, while Dovi (2015, p.11-12) suggests that accountability forms the representation-democracy link implied by Pitkin's quote (Dovi, 2015, p.10). The normative and structural role of democratic accountability is consistent with the notion of linking the represented with representatives. For Warren (2014, p.40), accountability supports the democracy-defining norm of individuals' "entitlement to proportional influence over collective decisions which affect them", by "connecting" them to "agents who make and organize these decisions on their behalf".

Like representation, it is a complex concept with multiple, sometimes conflicting, purposes (Dubnick, 2005; Bovens, Schillemans and 't Hart, 2008; Rowe, 1999). Such perspectives have tended to focus on discipline and control (Borowiak, 2011; Olsen, 2013; Ebrahim, 2005). A narrow focus on control comes at the expense of accountability's "generative democratic potentials" for Borowiak (2011, p.13). Both he and Olsen (2013) theorize more deliberative and constructive roles for accountability in generating and maintaining new forms of political community, among other things. Olsen (ibid, p.458) describes accountability processes as providing "an opportunity for explaining, justifying, challenging and changing the existing order".

Dialectical inquiry refers to an "intentional effort to connect two unrelated fields of inquiry, by recognizing their respective structures – their foundational premises, theoretical frameworks, concepts, tools and spaces of inquiry – and exploring how, if at all, they may be reconciled" (Hartley et al., 2023 p.2). By exploring the connections between public administration and democratic theory through how they interpret representation, I seek to reconcile them into a constructive and democratically legitimate role for public administration. In particular, I suggest that representatives' *knowledge* about who and how to represent is an underspecified concept in both fields. I argue that administration can legitimately foster acquisition and dissemination of knowledge which serves the represented and representatives, from challenges brought by members of the public. The learning perspective I propose is one of bureaucracy *in representation*, and builds on the more constructive possibilities of accountability imagined by Borowiak, Olsen and others (cf. Doyle and O'Brien, 2019).

Representative bureaucracy and democratic theory

Representative bureaucracy (RB) responds to wider concerns about democratic shortcomings in modern representative government and social inequity in as far as public administration is concerned by suggesting that administrations may foster more representative outcomes by reflecting the demographic makeup of the populations served within their personnel (so-called passive representation) and by enabling decisions and outcomes to be affected through administration in such a way that different needs – particularly of minorities or traditionally disadvantaged groups – are better reflected and served (active representation) (Bradbury and Kellough, 2011). It has spurred a large body of mostly positive literature (see Ricucci and van Ryzin, 2017 and Bishu and Kennedy, 2019 for surveys), and there has been relatively less analysis of its conceptual underpinnings (Meier and Morton, 2015 p107). Webeck and Lee (2022) offer a recent exception, making a case for a behavioral foundation in RB to explore and explain its micro-level mechanisms.

This section instead discusses the concept of active representation in RB theory, using democratic theories of representation – which have taken a broader approach to the concept (Kennedy, 2013) – as reference points. What emerges from this comparative discussion is a view that the concept of *knowledge* is underspecified in theories of representation, not only in RB (where it is implicitly confined to social background) but also in democratic theory.

Much of contemporary representative bureaucracy's core adapts democratic concepts for the administrative context. Hanna Pitkin's (1967) influential contribution to democratic theory posited four conceptual types of representation: passive, substantive,

symbolic and formalistic. The first three of these have nominally defined successive waves of the representative bureaucracy literature (Ricucci & Van Ryzin, 2017; Bishu & Kennedy, 2019). Passive representation refers to the extent to which a representative resembles those being represented, while substantive (or active) refers to the actions the representative takes “acting in the interest of the represented, in a manner responsive to them” (Pitkin, 1967 p209). Symbolic representation refers to the meanings the representative holds for the represented.

Standard democratic accounts focus on political representation, and suggest that for representatives to be democratic, they must be authorized, act in a way which promotes the interests of the represented, and there must be some means for the represented to make representatives accountable (Urbinati and Warren, 2008). Representative bureaucracy scholars have parried critiques made on democratic legitimacy grounds by invoking Friedrich’s classic argument that bureaucratic discretion is unavoidable, and responsibility therefore essential within administration. Thus, the argument goes, bureaucracy should be passively representative so that discretion is exercised in a representative way (Mosher, 1968; Ricucci and van Ryzin, 2017).

In reviewing the literature on standard democratic theories of representation and on representative bureaucracy, I suggest there is a shared weakness in failing to examine more closely the role or source of representatives’ *knowledge* when it comes to active representation. It is implicit that the active representative must know something about the represented, their interests and their values in order to act in their interest or on their behalf. In democratic theory, Rehfeld (2009) distinguishes between internal versus external ‘sources of judgment’, which helps to describe the source of knowledge in conceptual developments in theories of active representation since Pitkin (1967).

On the internal side of 'sources of judgment' we may place the attention paid to the relationship between passive and active representation, which assumes that knowledge comes from social background. The passive-active link is an important part of arguments for passive representation of historically marginalized groups in legislatures (Williams, 2000) and bureaucracy (Mosher, 1968; Meier, 2019). Bradbury and Kellough (2011, p.158), for example, describe active representation by bureaucrats as occurring because they "share core attitudes, values, and beliefs with the social groups from which they are drawn" through "common socialization experiences".

However, a more general specification of this intrinsic or endowed knowledge is implied in what Mansbridge (2003, p.520) terms 'gyroscopic' representation, in which representatives act according to internal principles, values and interpretive schemes like common sense. Mansbridge (2011) suggests that both demographic characteristics and political attitudes may form the basis of gyroscopic representatives being "like" their constituents, implying shared attitudes or political ideology as an additional source of knowledge.

On the 'external' side are two types of representation put forward by Mansbridge (2003): 'promissory', which implies that knowledge for how to represent is given by winning election campaign manifestos; and 'anticipatory', where representatives must seek to discover constituents' preferences as they apply for the next elections. Under this forward-looking perspective, Mansbridge discusses how the type of knowledge or understanding representatives need in order to be re-elected differs from the backwards-looking perspective of representing based on recently endorsed electoral promises. The perspective is more deliberative, with scope for 'intensive' citizen-

representative interaction. It may see legislators learn “about the policy consequences and the political consequences of specific decisions” (ibid, p518).

Overall, I interpret the above perspectives as implying at least four broad sources of knowledge, which I summarize in Table 1.1: i) social background; ii) ideology; iii) an authorized mandate; and iv) deliberation and interaction.

Table 1.1 Sources of representatives’ knowledge

<i>Source of representative’s knowledge</i>	
<i>Internal</i>	<i>External</i>
Political ideology and belief systems	Winning electoral manifesto
Social background	Deliberation and interaction

The focus of RB on one of these sources of knowledge limits its account of how administrators may use their discretion in representative ways. Kennedy (2013) makes a similar evaluation in a study of bureaucratic role perception, noting furthermore RB’s focus on certain dimensions of social background (race and gender). Meanwhile, Bradbury and Kellough (2008) found in a United States empirical context that shared attitudes were more significant to local government bureaucrats assuming a ‘minority representative’ role than race. Like Kennedy (2013), I suggest that an exclusive focus on social background precludes other lines of inquiry for PA’s conceptual relationship with representation. Whereas Kennedy’s approach is to explore it through administrators’ perceptions of their *role* as it relates to representation, I take an alternative approach in exploring how administration may contribute to, act on and transmit different kinds of information about the represented public.

Table 1.1 suggests two further limitations of active RB in its focus on an internal, or endowed source of knowledge rather than an external or responsive one. First, its basis in a source of knowledge internal to the individual administrator lacks a clear means for achieving transparency or accountability for the differential inputs and influences on public decision-making from one bureaucrat to the next. Second, it implies a source of knowledge which is accrued over a lifetime (through socialization or lived experience) and which may thus be relatively fixed or slow to update. This raises questions as to the relevance of social background for interpreting and responding to emergent issues which arise, for example from environmental turbulence (Ansell, Sørensen and Torfing, 2023). I next explore how a different, *external* 'source of knowledge' for representation – deliberation and interaction – has been treated in democratic theories of representation. Urbinati and Warren (2008) describe non-electoral democratic representation as a new frontier for democratic theory and research, recognizing the electoral cycle's lack of sensitivity to information. Deliberative theories of democracy have criticized the standard account for providing a weak understanding of political will formation (ibid). Bottom-up theories like Rosanvallon's counter-democracy (2006) and Saward's (2006) representative claims emphasize voice and argue that there is a good deal more to 'democratic activity' than elections (see also Guasti & Geissel, 2019; Montanaro, 2012). Rosanvallon (2006) describes a long history of 'counter-democracy' as a reactive force in the broad scheme of democratic activity, as well as the "myth" of the passive citizen. He argues that citizens "now have many ways of expressing their grievances and complaints other than voting" (ibid, p.19). Meanwhile, Saward's concept of representative claims – or claims "to represent or to know what represents the interests of someone or something" (Saward, 2010, p. 38) has inspired a large constructivist

literature which has further “broadened the scope of representation beyond the monopoly of elected representatives” (Guasti & Geissel, 2019, p.103). In this literature, representation is dynamic and found in the ensemble of making, accepting and rejecting of claims (to represent).

Urbinati and Warren (2008) suggest that these extra-electoral forces are indispensable if electoral representation is to work. We might however question how such forces interact with representative government and enable the latter to ‘know’ how to represent. If citizens have alternative “vectors of expression” to voting to affect decisions made in their name (Rosanvallon, 2006 p19), it follows that representative government has corresponding behaviors and responses to these alternative vectors. Representative claims are argued to work or exist only if they are somehow acknowledged, absorbed, rejected or accepted by some audience (Guasti and Geissel, 2019 p103).

This interpretation of extra-electoral and deliberative theories suggests that existing accounts of representation are lacking when it comes to how voice and other external information are *mediated* into representative government to become usable knowledge about how to represent.

Learning and accountability

A criticism Dovi (2015, p.10) makes of Pitkin’s early account of representation is that it did not address mediating effects of “vertical relationships”, *including bureaucracy*, on the relationship between elected representative and constituents. Meanwhile, Borowiak (2011) and Olsen (2013) speak to the larger democratic potential of accountability than simply control. When we move from theories of democratic to *public* accountability, we

find that learning and improvement has emerged as a newer, recognized 'normative purpose' of accountability alongside democratic control and assurance (Bovens et al. 2008; Greiling & Halachmi, 2013). While often discussed in managerialist terms, Bovens et al. (2008) trace its conceptual roots to perspectives on democracy as an intelligent and self-correcting system (Lindblom, 1965; Easton, 1965; see also Olsen, 2013), whereby accountability mechanisms provide channels for feedback and incentives for public actors to listen and act on it.

I contend that administration – as the ensemble of actors and organizations which implement policy and deliver services – and accountability are jointly relevant for the link between representation and a democratic ideal because administration plays a unique and under-explored role in mediating accountability pressures brought against representative governments by members of the public affected by its actions. I build on the learning perspective of public accountability – which has had less theoretical and empirical attention than traditional, control understandings of accountability – to articulate a role for administration in constituting and contributing to what the public and representative government know about the public the latter serves and how. What results is a proposal for a theory of *learning from civic challenges to policy work in the service of representation*.

The next section outlines the theory and argues that a learning perspective – as in acquiring rather than being endowed with knowledge – conceptually opens a wide range of channels for action in public administration for improving understanding of populations served and their needs.

1.3 Learning from civic challenges in service of representation

Administrative decisions cover a vast range of policy settings, including determinations of welfare or immigration entitlements, suspensions of students from school, or the degree of force used in a police arrest. In ‘mass-transactional’ public agencies, appeals of decisions can number in the hundreds of thousands per year (Thomas, 2015). In English and Welsh policing, the setting of the empirical endeavor of this dissertation, over 75 thousand formal complaints were logged between 2021 and 2022³. Thomas and Tomlinson (2019) note a significant expansion in recent years in administrative review – civic challenges handled within the public body being challenged – in contrast to tribunals and judicial review. Sandefur (2019) generalizes the observation in noting that judges and lawyers act atop “an enormous iceberg of civil justice activity, most of which is invisible to them and handled without their involvement.” (p50).

The perspective I advance is based on the following premises. The first is that challenging a decision, action or omission of a public administrator or the institutions which structure policy work (any actions or decisions carried out government and its delegates) is a democratically significant act by individuals affected by policy work, because it produces data about the public and about how state actions, policies or processes affect the public. By civic challenge, I refer to all forms of challenge or call to account which members of the public (or civil society on their behalf) may bring against actions or omissions of policy work which have affected them (or civil society organizations’ beneficiaries), and which public actors are formally bound to engage with. They include complaints, appeals and litigation—mechanisms typically researched in

³ Independent Office for Police Conduct. Accessed March 2023 at <https://www.policeconduct.gov.uk/news/iopc-publishes-figures-police-complaints-made-202122>

the domains of legal and ombudsman studies. The second premise is that representation is enhanced when it is better informed about the interests of all (Bertelli and Schwartz, 2022). By ‘representation’ I refer to both a more informed public (the represented) and more informed representatives. If civic challenges contain data about the interests of all, I argue these data should be cultivated and considered in administration and be accessible to the public and representatives.

A huge volume of civic challenges occurs out of public view and outside of representatives’ direct interactions and casework with constituents. Administration in representative government occupies a unique position between the public and representatives in fielding civic challenges. As a consequence of being the public body which is held to account in respect of an individual case, administrations are the primary recipients and holders of the data or signals which arise from such challenges, individually (civic challenges as cases) and collectively (across cases). They are thus potentially in a position to learn from them – or “acquire wisdom” as per Kingsley’s passage above – to adjust their own use of discretion, but also to foster learning among the public and representatives. I term this role *interpretive responsibility*.

I suggest that there may be a variety of ways for learning from civic challenges to occur. In part, my perspective is a call for exploratory empirical research to go ‘in search of the mechanisms’ in the thicket of bottom-up organizational and institutional processes. In part, it is also a call to *imagine* how such mechanisms could work (Chen and Chen, 2021; Doyle and O’Brien, 2019), suggesting analysis of innovative or outlier cases and participatory action research as promising approaches (with the latter argued to be underused in PA research by Ospina, Esteve and Lee, 2018). In the meantime, I suggest mechanisms for learning from civic challenges could include i) PAs maintaining

and reporting data or information about cases and trends in cases; ii) the creation of learning functions and systems within public organizations and other governance arrangements and the pursuit by PA learning through such systems; and iv) learning interactions or forums between public, representative and other organizations (for instance, civil society).

A roadmap

To present the perspective, I will first discuss the concept of civic challenges in more detail, making the case for their democratic significance as 'data' before outlining what the literature and empirical examples can tell us about learning from civic challenges in the administrative domain. This brief review highlights the lack of a dedicated, cohesive and recent body of scholarly work on the topic in spite of a nascent trend in recent decades towards exploiting civic challenges for learning purposes in practice. This apparent lacuna points to the need for exploratory empirical work to identify how civic challenges and learning from them are perceived and handled by administrative insiders, as well as relevant learning mechanisms.

I then briefly discuss the notion of learning from civic challenges beyond the administrative sphere, or the connection from administrative to public and representative learning domains. Because of the gaps in the literature alluded to above, my argument that learning in the wider public or by representatives is contingent on how civic challenges are handled and processed by administration in the first instance, my emphasis is on learning processes and conditions in the administrative sphere. As such, the mechanisms connecting the administrative and public domains of learning as

proposed in the overall perspective are sketched out in anticipation of more dedicated inquiry.

Civic challenges to policy work

Nadia Urbinati (2006, p.6) argues that representation serves to “depersonalize” individual claims and interests. Through policy work, we might argue that policies and services are ‘re-personalized’ and experienced by individual members of the public. The service or decision rendered to the individual – whether by a public hospital, school, police officer or other street-level bureaucrat – is where the culmination of representative government’s abstract policies (whether explicit or implicit⁴), institutions and implementation decisions meet reality.

Civic challenges are a vector of expression (Rosanvallon, 2006) about what happens at this ‘meeting point’ for individuals affected by policy work (commonly considered as citizen-state interactions in public administration research; Jakobsen et al., 2019). When members of the public disagree with or are dissatisfied with the processes or outcomes of policy work they have experienced, they can often make this dissatisfaction known, seek redress or try to challenge the alleged decision, action or omission through formal accountability mechanisms including complaints, appeals, administrative review, litigation or judicial review. These diverse mechanisms, which are often treated within their own dedicated areas in legal or policy field scholarship, have the following points in common: they are brought by individual members of the public (or sometimes by civil

⁴ Consider for example Lindblom’s (1959) concept of ‘mutual adjustment’.

society organizations on their behalf) in respect of a state action, decision or omission which the individual alleges has affected him or her; and they are brought through channels which mandate a response by the challenged authority. The requirement for public actors – alleged to be at least partially responsible for whatever is contained within the claim – to assess and respond or otherwise engage with the claimant makes the interaction one of public accountability.

I refer to these actions by affected individuals and the mechanisms they use collectively as *civic challenges*. I consider them to be a form of feedback (Easton, 1965; Buckmaster, 1999) which contains data about the interests of all citizens, whether as an individual case or across cases. An important feature of this ‘democratic data’ is that it is *noisy*.

Noisy democratic data

To elaborate on why civic challenges are a democratically significant source of data for representative government, we may compare them to extra-electoral theories of representation emphasizing voice, the ‘representative bureaucrat’, and participatory mechanisms for ‘bringing the citizen in’ to policy work. In comparison with the sound and fury implied in theoretical perspectives like counter-politics (Rosanvallon, 2005) or representative claims (Saward, 2006), I suggest there is greater civic depth to this more narrowly defined kind of voice, expressed through formal channels which mandate a state response. Claimants are to some extent informed of their expectations and their experience as it relates to the specific action they seek to challenge. By making a claim they must become informed of the process for engaging with the public agency. Before

or during their challenges, they may have or gain awareness of rules, standards, obligations or policy goals which applied to the public actor's decision.

Neither bringing nor responding to a claim is costless for the individual or the public actor, respectively. This implies a self-interested but also a normative role for a would-be "responsible [member] of a political community, accountable... for participating in political and civic life, keeping informed, not making unattainable demands, and accepting duties towards the welfare of other citizens, including the vulnerable who cannot protect themselves" (Olsen, 2013). This is not to presume the motivations behind individual challenges, which may be pro-social, self-interested, ideological or vexatious (though a systematic review of empirical studies in healthcare finds that service improvement is a primary motivation for many complainants, van Dael et al., 2019). Rather, it is to point out the normative and economic dimensions of the decision to pursue a claim, and to suggest that they increase the likelihood of information from claims *collectively* reflecting 'genuine' issues, brought forward by citizens of their own volition.

Compared to the 'endowed knowledge' held by administrators in representative bureaucracy theory, the data which arises from civic challenges is more transparent, and can thus be 'unbundled' from the black box of an individual administrator's professional or life experience. This enhances the scope for accountable and transparent use of insights which may arise from civic challenges about groups with different characteristics (for example), and in principle enables any administrators and administrations to consider and integrate such insights – and to be held to account for whether and how they do so – regardless of their background or make-up.

In principle, accountability mechanisms which require public actors to justify or review their decisions with respect to affected individuals are equal access on the basis of being affected and can thus be said to support the democratic norm of individuals' "entitlement to proportional influence over collective decisions that affect them", or the all-affected principle (Warren, 2014). This implies that the data produced by such interactions are legitimate and non-elitist in a way that information arising from participatory mechanisms or organized-interest influence on collective decision making is not. Lafont (2019) argues that through the political process, "there is no way to guarantee that, for each piece of legislation, the political process will reliably identify all potential collisions with the fundamental rights and freedoms of different citizens and groups, such that they can be preemptively subjected to proper political deliberation and ruled out with convincing arguments." (pp230-231). I suggest the same notion applies to any form of ex-ante public decision-making.

Importantly, through openness to the voice of affected *individuals*, the data from civic challenges is able to capture unorganized interests. 'Bureau-centric' studies of administrative law have tended to portray it as "shifting toward the promotion of a kind of pluralism as administrative officials interact with *unorganized constituencies*" (Bertelli and Cece, 2019 p.1, emphasis added). Through a social equity lens, this feature is a potential improvement on perspectives which entail interest groups or the imposition of a particular organizational frame of reference ex ante, as it is more open to emergent, unexpected or intersectional social vulnerabilities or marginalization dynamics. As such, I argue that marginalized voices and issues are likely to be disproportionately present in the data arising from civic challenges, as marginalized groups are less likely to have

participated in ex-ante policy making and likelier to be affected by trade-offs and blind spots in policy implementation⁵.

What is the nature of civic challenges as ‘data’? What can be learned from such data?

In terms of form, the individual challenge can embody rich, contextual data as a standalone case. It can form one of a set of comparative cases, and so on, up to representing a single data point within a sample or population of claims brought with respect to a given public agency, policy field or function.

Examples may be found of qualitative and quantitative analysis of civic challenges in both academic research and practice, for instance by ombudsman bodies or in commissioned, ad hoc reports⁶. A systematic review by Reader, Gillespie and Roberts (2014) of quantitative patient complaint studies suggested three major domains of complaint types: patient safety and quality of clinical care, management of healthcare organizations, and issues within healthcare staff-patient relationships. Each of these issue types is clearly a concern for public health managers, but they are arguably not only managerial concerns. At the very least, they may concern representatives and the public from the point of view of better *controlling* public managers and holding them to

⁵ This point depends crucially on equality of access to justice, which is not a minor consideration in light of debates around access to justice crises in contexts like the United States (Sandefur, 2019). I address this point in the discussion section, suggesting that part of PA’s ‘stewardship’ role in learning from civic challenges involves seeking to understand who does *not* bring civic challenges, with a role for positive action in seeking to reform civic challenge processes and practices to address such disparities (thus reducing the ‘noise’ in their civic challenge corpus).

⁶ Reports have been commissioned into the drivers and motivations behind complaints and litigation in areas like public healthcare; Behavioural Insights Team (2018) *Behavioural insights into patient motivation to make a claim for clinical negligence*, commissioned by the UK’s NHS Resolution; and on the initiative of various commissioners, e.g. Victoria, Australia’s Disability Services Commissioner (2012) *Learning from Complaints - Safeguarding People’s Right to be Free from Abuse - Key considerations for preventing and responding to alleged staff to client abuse in disability services*

account. This theory proposes that civic challenges may also provide feedback on objectives and norms themselves.

For example, Doyle and O'Brien (2019, p14) imply that local expressions of concern which preceded the Grenfell Tower disaster in London in 2017 were one "manifestation of broader reservations about national housing policy". In a study of complaint-led innovation in the public sector, Simmons and Brennan (2013, p7) suggest that complaints can help to identify and prioritize need, highlight opportunities to change, challenge established wisdom, co-create and co-produce solutions and uncover system failures. In a later study (Simmons & Brennan, 2017 p1087), they point to arguments that not all innovation resulting from complaints 'should' occur and instead should be "debated more widely", indicating the relevance of civic challenges beyond the administrative sphere. Interestingly, authoritarian regimes like China and pre-1989 Bulgaria have been found to have invested significantly in analyzing citizen complaints (petitions in China), not only for what they reveal about local government behavior and performance, but also about latent public dissatisfaction and policy preferences (Chen, 2016; Dimitrov, 2014).

An important feature of civic challenges seen through a data lens is *noise*. There is ambiguity in what a single challenge or a collection of challenges may reveal. In part this is a consequence of allowing that a single challenge may indicate dissatisfaction or problems which have causes at different levels (e.g. the street level bureaucrat, the processes they have followed, their supervision, their agency or profession, the policy goals under which they are operating, and so on). Reader et al.'s (2014) systematic review of 59 quantitative medical patient complaint studies represents over 88,000 complaints. Their synthesis of the underlying studies' coding approaches identified over

113 thousand 'issues' behind patient complaints, analyzed through 205 different analytical codes representing (in their own synthesis) 29 subcategories of complaint issue.

Noise may also be a consequence of the subjective and conflictual nature of making and responding to a challenge. At a basic level, a civic challenge can be thought to reflect a mismatch in a member of the public's expectation in an encounter with, or decision by, public actors and what they experienced. This mismatch reveals an inherent subjectivity and often contested nature as key attributes of civic challenges 'as data'⁷. The various motives involved in making a challenge muddy the waters further. These features distinguish them from other types of socio-technical performance data which have been central to studies of organizational learning 'from failure' in management literature, which focuses on private sector contexts like airlines (Haunschild and Sullivan, 2002) and railways (Baum and Dahlin, 2007).

Nonetheless, existing perspectives which recognize claims and challenges as feedback for 'improvement' tend to characterize them as a form of performance data. Greiling and Halachmi (2013, p388) expect that the "intelligence extracted from collecting and analyzing" performance data will "flag organizational structures or standard operating procedures in need of urgent managerial attention". I argue that they also offer insights beyond the purely managerial.

⁷ For example, organizations in the UK's National Health Service received over 25,000 complaints in 2019-20, with just under half being fully or partially upheld (Parliamentary and Health Service Ombudsman (PHSO, Accessed 19 January 2022 at <https://www.ombudsman.org.uk/publications/complaints-parliamentary-and-health-service-ombudsman-2019-20-and-2020-21>)

One implication of noise is that not all individual civic challenges offer useful insights (Schwartz, 2014), and we must also consider what they *cannot* capture as data. Effects on members of the public from policy work may have easily identifiable and proximal causes, but often will not. This suggests an important boundary condition for the theory. Civic challenges often relate to serious matters (for instance loss of life and limb in public healthcare or law enforcement, or immigration or welfare eligibility determinations) and may be highly consequential and emotive for the individual even at lower levels of claim formality (Thomas & Tomlinson, 2019). However, if an individual has avenues to challenge a public postal worker's incivility, but not their town's main employer relocating overseas due to trade liberalization policies (for example), it is reasonable to question the stakes involved in civic challenges as a source of meaningful feedback for representative government. Identifying boundary conditions around what claims as data can and cannot signal could be approached conceptually and empirically.

Whatever the sources and nature of noise (which is in part a question for empirical inquiry), it has some important conceptual implications for a theory of learning from civic challenges. First, for insights to be extracted from civic challenges, *interpretation* is required. Interpretation of some stimulus is a standard component of mainstream theories of learning (cf. Crossan, Lane and White, 1999). The noisier the data, the likelier it seems that they can accommodate a *plurality* of interpretations. Plural interpretations are also likely when considering that a given challenge can be analyzed at different levels of abstraction, from the single case to a single data point in a statistical data set.

Learning from civic challenges in administration

The vast majority of civic challenges are fielded and handled by administrations (Dunleavy et al., 2010), and even claims which escalate from the front-line organization to an ombudsman, court or to wider public attention largely pass through administrative review first (Thomas & Tomlinson, 2019). It is thus necessary to understand how civic challenges are conceived of and handled in policy work per se.

Literature on learning accountability in the public sector is relatively recent (Rashman, Withers and Hartley, 2009) and has focused on major public crises or failures as explanandum or explanans for learning (cf. Romzek and Dubnick, 1987), with little attention to more quotidian and high-volume individual claims and challenges which never reach the public eye. Simmons and Brennan (2017, p1085) note that “mechanisms for harnessing user voice and complaints are often not fully understood, and their potential is often underdeveloped”. This lack of attention may be due to a conceptual conflict alleged between defensive administrative behaviors in blame and sanction-related purposes of accountability and the candor and open culture required for learning and improvement (Bovens et al., 2008; Schillemans and Smulders, 2015), a tension central to the general organizational learning literature (Argyris and Schön, 1978; Greiling & Halachmi, 2013). I suggest that the blame-learning tension is so taken for granted that it has limited the development of other approaches to how policy workers may interpret and handle accountability pressures like civic challenges.

Collective forms of learning from civic challenges – whether at an organizational or higher level – is a concept which thus lacks a dedicated or cohesive body of scholarly

work. However, recent decades have seen attempts at institutionalizing this very concept in some public service settings, and it has been arising more frequently in political-administrative discourse. It is intrinsic to the mandates of many public ombud institutions, and to normative perspectives on their proper role, that they should foster (executive) government learning based on the recommendations they derive from complaint investigations (Gill, 2018). Activities ombud institutions carry out to this end include publication of statistics about complaints and their investigations, thematic reports and interpretive frameworks for complaint handling. For example, the UK's Independent Office for Police Conduct has published a regular 'Learning the Lessons' bulletin since 2007 based on police complaints. To a lesser extent, a role in helping to raise standards in administrative decisions is also argued for administrative justice mechanisms like tribunals (Thomas, 2015) and judicial review (Feldman, 2003 p289).

Within front-line public organizations – those responsible for the functions and services resulting in civic challenges – the learning concept is newer and generally not a part of the organization's core functions or mission. However, the scale of administrative activity and interactions between front-line organizations and citizens leaves them with high visibility of civic challenges against their policy work (in terms of volume and scope of contextual information around challenges – i.e. the task environment or the context in which citizen-state interactions unfold – as well as the challenges themselves), and with the ultimate discretion or responsibility to implement changes to procedures or practices (whether coerced or voluntary).

The patient safety movement in United States healthcare led to what is perhaps the most advanced institutionalization of systems and norms for learning from civic challenges. A landmark report (Kohn, Corrigan and Donaldson, 2000) argued that medical error was more widespread than commonly believed, often due to systemic rather than individual weaknesses, and that “gathering and analyzing information about error was key to addressing these systemic weaknesses” (Schwartz, 2014 p1087). The report is credited with shifting norms in healthcare towards the systematic gathering and analysis of individual claims and challenges (ibid), with a concomitant cultural shift of ‘world views’ away from blame-focused accountability regimes to system-oriented regimes which are “open to discovery and discussion of problems” (Bovbjerg, Miller & Shapiro, 2001 p.374). Patient complaints and claims analyses have since proliferated (Vincent et al., 2006). Outside of healthcare, implementation of ‘learning from civic challenges’ institutions has been less marked even if ‘learning lessons’ has become a common buzzword in political-administrative discourse. Recent national reforms to policing in England and Wales have explicitly sought to reorient the police complaints system away from blame of individual officers towards individual and collective learning (the Policing and Crime Act 2017; Torrible, 2021), for example.

I suggest mechanisms for learning from civic challenges are enabled through PAs systematically maintaining and reporting data and information about cases and trends. This implies a *stewardship* role for PA in maintaining and developing its ‘corpus’ of civic challenges and understanding its limitations (including its noise dimensions), such that it can serve as an evidence base for internal and external learning activities. Within PA, the main mechanisms for learning from civic challenges may then be the introduction of

organizational learning functions and systems for analyzing civic challenges, both for internal learning – or improving services and processes in line with the agency’s mission – and external learning, where PAs' role would involve communicating and making different kinds of civic challenge data and analyses accessible for external discovery, monitoring and interpretation.

Learning from civic challenges beyond administration

If policy work is done on behalf of the people, then it is in the interest of all that it is carried out in ways which respect values like those of public law (legality, fairness, rationality, proportionality) and good government (equity, responsiveness, transparency and probity; Romzek, 2014, p317). Likewise, the outcomes of policy work are in the interest of all. Do the outcomes match objectives and expectations? Do they do so effectively and efficiently? Were the different impacts – direct or indirect – of policy work in line with expectations, and if there are unintended consequences or impacts, what are they, and are they acceptable? While processes and outcomes of policy work are in the interests of all citizens, whether or not they satisfy different values or standards is observed and judged in the first instance by individuals in their interactions with the state. Public and representative domains of learning from civic challenges imply that the public and their representatives may become better informed about the complex workings and impacts of policy work and policies, as well as about the plurality of interests and issues within the public itself.

In a related argument, Lafont (2019, p240) suggests that “judicial review offers a key institutional mechanism by which minorities can be empowered to force an otherwise

inattentive, misinformed, ignorant, or indifferent majority to listen to their cause and join the political debate on the merits of the issues at hand.” She describes the courts as being able to play an institutional role of ‘conversation initiators’ (p237). Her implied mechanism is the debate which springs from the public and media interest in constitutional challenges. In the theory I propose, which includes judicial review but also all the administrative review mechanisms which precede it in formality, the public domain of learning is also envisaged as a site where debates and conversations might open into the themes arising from civic challenges. However, the vast majority of individual cases will not attract any degree of public attention. Instead, I suggest that the role of PA is to facilitate such conversations occurring through its ‘stewardship’ role in maintaining and developing its corpus of civic challenges as an evidence base, and to communicate and interact with other organizations (public, representative and civil society) to foster collective and plural interpretation of patterns in their civic challenge data.

A number of potential benefits may arise from learning from civic challenges among the public and among representatives. First, it has the potential to improve monitoring and control along the democratic chain of command, with the public better able to monitor and control both representatives and administration, and representatives better able to monitor and control administration. Second, it has the potential to spur public debate and the development of mutual understanding on issues which emerge which might not have otherwise arisen through other preference-revealing mechanisms like elections. Finally, it may help to focus political attention where there are public interest issues which administrations (sometimes uniquely) can perceive but not act upon.

Whether and how learning from civic challenges occurs in public and political spheres, and the role of administration, becomes an empirical question which requires investigation as part of the further development of this theory. Learning from civic challenges as a new paradigm in healthcare in the United States, the United Kingdom and elsewhere required large-scale institutional and cultural change, and that was without any apparent ambition for the 'learning' envisaged to occur beyond clinical and managerial levels. At the very least this indicates that such learning does not just 'happen', an argument commonly found in the organizational learning literature (cf. Moynihan and Landuyt, 2009). Some important level of will is required.

Returning to arguments already made about what administration can legitimately do in service of representation, and about the features of civic challenges as data (in particular, their noisiness and how it opens them up to plural interpretations), indicates that a principle of *transparency* in civic challenges and how administration handles them would be important for such learning to occur.

1.4 Discussion

The perspective I have advanced outlines how administration can facilitate learning from civic challenges 'in service of representation', in terms of its position between the public and representatives in the business of representative government. I argue the position confers a form of *stewardship* over the noisy signals which emerge from civic challenges. A number of questions flow from this which must be addressed in order to further elaborate and test the theory. Positive questions include how administrations

maintain, interpret and handle civic challenges, the patterns they may contain, and to what ends.

I have positioned the learning perspective in the clearing left between control accountability and what I have called surrogate representation, as the predominant responses to what is or should be public administration's role in the face of democratic deficits. As I have argued, control accountability does not address the information problem inherent in democratic deficits (it assumes elected representatives know or learn enough to issue good directions in what is a vast and complex environment of de-centered authority). It also limits public administration's normative role to that of a bystander.

Meanwhile, surrogate representation arrangements find innovative ways of drawing in information about the public, but they do so in ways which may displace issues inherent to democratic deficits (like elitism; Warren, 2009), for instance through the different ways that they organize, partition and define public issues and decisions (Lafont, 2019; see also Bertelli, 2021 p92; List, 2011). In the dialectic analysis above I developed this critique especially as it regards active representative bureaucracy, but it is one which may be made of any governance arrangement, whether they have the effect of partitioning issues 'top-down' (as in participatory arrangements designed or orchestrated by administrators) or chronologically (as in collaborative arrangements, in which shared problem frames and problem-solving approaches are developed by collaborating partners over time; Emerson, Nabatchi and Balogh, 2012).

The political non-neutrality of organizing per se has been recognized in public administration research (e.g. Christensen, Lægreid and Røvik, 2020 drawing on Schattschneider's (1960, p71) "mobilization of bias" portrayal of political organization). In the modern context of environmental turbulence (Ansell, Sørensen and Torfing, 2023), I suggest the shortcomings of control accountability and surrogate representation become more apparent. Elections already provide blunt and infrequent informational signals (Urbinati and Warren, 2008) without the arrival of crises like the Covid pandemic, which upend prior policy agendas and electoral manifestos. What is needed are additional, more dynamic sources of insight about the public. Meanwhile, the relatively 'stable' or 'predictable' development of problems previously conceptualized as wicked have become more volatile and emergent under turbulence (Ansell, Sørensen and Torfing. 2021 p2), making any partitioning of issues more blunt or naïve in the face of a more dynamic reality. I suggest that taking civic challenges and the data they represent as a theoretical vantage point, as I do in the perspective advanced above, is a helpful and novel way of comparing and assessing different types of governance approach in such environmental conditions.

Normative questions arise about how administrations *should* interpret or learn from civic challenges and to what ends. For this, I return to the control versus responsibility approaches to administrative discretion discussed earlier in the essay. Civic challenges provide a means for controlling administration, in the individual case and by providing a record which facilitates future control. Interestingly, this is a recognized purpose of citizen complaints analysis carried out by authoritarian regimes like China (Chen, 2016) and pre-1989 communist Bulgaria (Dimitrov, 2014). At the same time, administrations

have discretion in how they handle challenges within the bounds of procedural requirements, and how they respond to authoritative mandates like court judgments (cf. Canon and Johnson, 1999). In the learning perspective, they also have discretion in how they handle the signals represented by civic challenges beyond individual case resolution.

The learning perspective acknowledges that civic challenges as data are noisy as well as 'democratic', providing a rationale for administrations to not consult past civic challenges as a source of information for their decision-making, let alone facilitating wider discussion. However, this rationale becomes weaker in light of advances in, and spread of, information, communication and governance technologies, as well as increased analytical capabilities within administrations (Pencheva, Esteve and Mikhaylov, 2020). Such developments increase the feasibility of i) understanding why the data are noisy and ii) extracting and understanding patterns.

I propose the concepts of *civic challenge stewardship* and *interpretive responsibility* in which administrations use their discretion as regards civic challenges to facilitate the clarification of civic challenge signals (as in the reduction or better understanding of *noise* in the data, including an appreciation of who *doesn't* challenge and why) and identification of patterns in the data, respectively. This may involve seeking to clarify the signal and identify themes 'in-house', and it may involve facilitating such activities by other actors, including other public bodies, civil society, academia and representative institutions. Facilitating clarification and interpretation by others appears especially desirable given the scope for plural interpretations of noisy democratic data, and it

implies that as civic challenge stewards, administrations should work to enhance transparency, accessibility and data quality which can enable other actors to engage in meaningful interpretation.

In terms of its relationship with other theories, learning in service of representation finds parallels with Christina Lafont's (2019) democratic case for judicial review, in the sense that civic challenges are argued to have public, political meaning and implications beyond the individual claim and its resolution. She suggests that judicial review helps to deliver deliberative democracy 'without shortcuts' of the kind found in many 'micro-deliberative' mechanisms or through 'blind deference' to experts in policy making. The present theory complements these ideas, with civic challenges as a broader class of mechanisms which includes higher volume complaints and appeals as well as judicial review, and administrations as the focal actors of interest rather than courts.

In viewing administration as having an important but underappreciated role in the gap between 'concrete, local democracy' and 'abstract, centralized representation' (paraphrasing Pitkin, 2004), the learning from civic challenges perspective also has parallels with Ansell's (2011) evolutionary learning perspective in *Pragmatist Democracy*, in which public agencies can "become the center of bottom-up consent building" (p165) by "engaging publics in the problem-solving process" (p157). Ansell argues this is best achieved through collaborative governance. Where Ansell's perspective focuses on the role of agencies in how problems should be solved, with implications for government legitimacy, my learning from civic challenges perspective is one in which public agencies can facilitate the identification and understanding of

emergent and contested problems, without necessarily having a hand in 'solving' them per se.

Collaborative approaches could be one way that problems arising through civic challenges are addressed, a way in which the theories could complement one another. On the other hand, participatory mechanisms which are initiated and structured top-down may restrict the voices and issues in ex ante decision making and consensus building which might surface. In contrast, learning from civic challenges generates potential for a bottom-up 'percolation' of a wider spectrum of issues and voices and does so in a manner which may be easier to document, favoring public transparency and accountability. Because civic challenges are a 'live' signal, interpreting and learning from them also offers greater corrective possibilities than arrangements which may bake in a given prioritization of issues, constituencies or sets of relations among involved actors.

As well as collaborative governance and minipublics, a similar argument may be made regarding representative bureaucracy (interpreted here as imposing an organizational 'lens' in decision making based on social composition). Simon (1991, p125) suggests that "an organization learns in only two ways: a) the learning of its members, or b) by ingesting new members who have knowledge the organization previously didn't have." This marks a distinction between the present theory of learning – in which I suggest that all policy workers and organizations are capable at some level of learning from the public they serve (importantly, provided the right incentives and other learning conditions are in place) – and representative bureaucracy, which instead suggests that

public agencies must ‘ingest’ certain types of members in order for the agency to know about the public it serves.

Two important limitations of the theory are first, that conceptualizing civic challenges as democratic data may be questioned on access to justice grounds, or based on the important question: *who complains?* Second, a large number of decisions take place at arms-length (or further) from the citizens who will be perceptibly affected. This raises the question as to the extent of useful policy information which can arise from learning from civic challenges. In response to the first, I suggest that PAs – in their role as stewards of the civic challenge corpus – should seek to understand who does not make challenges, or who finds it more difficult to do so (*ceteris paribus*), and should also take steps within their remit to reform civic challenge handling to address group-based disparities in access and use. In response to the second limitation, I suggest research is needed to better define the boundary conditions of what may usefully be learned, especially at the level of policy. Such research might compare between administrative justice systems or mechanisms, and/or the channels available for bringing civic challenges in different models of governance or public functions (for instance, regulatory as opposed to front-line services).

1.5 Conclusion

In this essay I have theorized a learning facilitation role for public administration within systems of representative government, building on a dialectic critique of public administration and democratic theories. I argue that public administration has an underappreciated role to play in facilitating the clarification and interpretation of patterns

in civic challenges to policy work in service of representation. I suggest that some forms of learning occur within administration itself – as in efforts to enhance control or how discretion is used – but the theory argues it may also occur beyond administration, through increased public understanding, awareness or debate. The theory is based on a characterization of civic challenges as noisy democratic data, which are received and processed in the first instance by public administrations. The mechanism involves i) PAs maintaining and seeking to develop their civic challenge ‘corpus’ to serve as an evidence base; ii) the creation of organizational learning functions and systems, and mandates to use and diffuse their civic challenge corpus for learning purposes; and iii) communication and interactions with other organizations (public, civil society and representative) to foster collective and plural interpretation of the signals contained in the civic challenge corpus. Overall, I have sought to offer a fresh perspective which can speak to broader concerns regarding democratic deficits, social inequality and the role that public administration could and should play in light of these concerns in representative government.

There is much scope for further work – both positive and normative – to elaborate on the concepts of civic challenge stewardship and interpretive responsibility. These include seeking to understand how PAs go about interpreting civic challenges, systematic and comparative assessments of learning from civic challenges as a ‘meta-concept’ in government, comparative case studies on policy reform (at different levels) where one or more civic challenges contributed substantially to the change, and analysis of what types of civic challenges can be made in substantive terms.

Perceptions of ‘noise’ in the signals produced by civic challenges and its causes might

be revealed through survey and qualitative methods. Future research should also seek to explore how representatives at different levels of government interact with and use civic challenge data or themes, directly (through constituent casework) or mediated through administration. Comparisons with the use of citizen complaints in authoritarian regimes (Chen, 2016; Dimitrov, 2014) might be interesting in this regard.

Through such research, the explanatory potential of the theory and its boundary conditions can be better defined. As well as describing and explaining whether and how learning from civic challenges happens, the theoretical perspective advanced should also be understood and elaborated by both researchers and practitioners in “design terms”, or as a blueprint for how things “could be” (Moynihan, 2022 p277; see also Nasi and Choi, 2023). As such, there is also significant scope for action research methods to experiment with different aspects of the theory, for example in ways of ‘clarifying’ the signal of civic challenges (for example, finding and addressing barriers to bringing complaints or claims) or interpreting themes.

2. Interpreting noisy democratic data: an exploratory study of English and Welsh police organizations

2.1 Introduction

Civic challenges – including complaints, appeals, claims and litigation – brought by members of the public against public bodies are an important mechanism for public accountability in citizen-state interactions. They can also be an important source of information about the public served, its expectations and needs, but there is little public administration scholarship which has explored how such pressures and processes in public organizations are perceived or interpreted within public organizations (Simmons and Brennan, 2017). In this essay I present a study of how police organizations in the United Kingdom – predominantly England and Wales – handle, interpret and seek to learn from civic challenges. The specific questions which informed the research design were: *How are civic challenges interpreted and handled within police organizations?* and *What (if anything) do police organizations learn from public complaints?*⁸

Police organizations were selected as an extreme case given the variety and scale of civic challenges against them, which range from ‘lower level’ forms like incivility up to excessive use of force resulting in death. English and Welsh policing was selected as an especially interesting case given recent reforms which have sought to reorient the national police complaints system away from an individual blame paradigm towards a ‘learning’ model. I adopt an abductive approach (Ashworth, McDermott and Currie,

⁸ A third research question, *Does social representativeness within police forces affect the nature or likelihood of organizational learning from civic challenges, and if so, how?* was part of the same data collection effort, and is treated with mixed methods in Essay 3. See Appendix 3.1 for more details on the uses of the interview data.

2019) to analyze a corpus of 43 semi-structured interviews with police officers, leaders, staff and policy experts gathered between November 2021 and October 2022.

Participants come from over 20 different frontline policing organizations, and represent a range of demographic characteristics, professional functions and levels of seniority.

The interview data were complemented by a number of documents used for familiarization with the empirical context.

In the spirit of Hambrick's (2007) call to valorize the "reporting of rich detail about interesting phenomena" (p1346), the paucity of existing systematic and recent knowledge about administrative interpretation of civic challenges led me to prioritize description over explanation. My aim is to provide more systematic descriptions than currently exist in public administration scholarship of how public agencies conceive of and handle the noisy signals which civic challenges represent. I view this as contributing a conceptual and analytical foundation for identifying and testing mechanisms of learning from civic challenges in public administration, which is important not least because the concept of learning from such challenges is positively and normatively contested (Torrible, 2020).

The results of my analysis are three descriptive pillars. The first consists of *general orientations to civic challenges*: five which are normative (bureaucratic, legal, managerial, public-centered and social), and which adapt a sociolegal concept of 'models of administrative justice' (Adler, 2003). Learning and defensiveness instead emerge as evolutionary (rather than normative) orientations, and I suggest that they tune or switch off the 'signals' contained in civic challenges within each normative model. A deeper analysis of what learning from civic challenges is *for* from internal

perspectives suggests it serves to enhance the public organization's internal *control*, to *stabilize* the organization against changes in the institutional and societal environment, and to better *protect* the organization, its workforce and the public. I thus interpret public organizations learning from civic challenges as *proprioceptive*, in that they seek to adapt internally and externally to external feedback created by their own actions – feedback which provides information about their posture and position in their societal and institutional environments.

The second descriptive pillar is *interpretive activities*. These include *engaging* with complainants and complained-about officers to better understand a given civic challenge, *sharing and consulting* with actors inside and outside of the organization (for instance citizen oversight panels), to aid interpretation of case details or themes in civic challenges or to *distribute interpretive responsibility* within and outside of the organization. Finally, actors involved in interpreting civic challenges engage in *emergent* (or bottom-up) and *established* (top-down) *theming* when making sense of patterns or case details. The final descriptive pillar is a range of knowledge types which may arise from interpreting civic challenge cases or trends. These include *knowledge about the public* (vulnerabilities and risks of harm, cultural difference and sensitivities, public understandings and expectations) and *organizational self-knowledge* (officer beliefs and behaviors, process and system gaps, and external institutional gaps).

2.2 Theoretical orientation

Civic challenges, which can also be referred to as citizen redress or administrative justice mechanisms, have received sparse treatment in public administration (see for instance Chanin, 2014) outside of literature on citizen or customer satisfaction (Tavares, Pires and Teles, 2022; Brewer, 2007). Empirical research on specific types of civic challenges exists within legal (Birkinshaw, 1985) and field literature, for instance complaints or litigation in healthcare (Vincent et al., 2006; Allsop and Jones, 2008; Reader and Gillespie, 2014; Baker, 1999) and policing (Prenzler and den Heyer, 2015; Schwartz, 2014). Such studies generally focus on (again) complainant motivations or satisfaction (Porter and Prenzler, 2015), which institutional actors should investigate challenges (Mulcahy and Lloyd-Bostock, 1994; Torrible, 2016) or identifying themes in complaint or claim cases (Reader and Gillespie, 2014). There is increasing interest in the concept of learning from civic challenges (Simmons and Brennan, 2017).

Organizational learning refers to the multi-level processes which change the scope of a public actor's potential behaviors, which are rooted in experience or some stimulus (Greiling and Halachmi, 2013). What I have described as the 'noisiness' property of civic challenges recommends analytical frameworks which emphasize interpretation and sensemaking. This included information processing perspectives, whereby learning involves transforming data into information, information into knowledge, and knowledge into action (Rashman, Withers, and Hartley, 2009; Huber, 1991; Argyris and Schön's, 1997; see also Crossan, Lane and White, 1999).

2.3 Research strategy

Theoretical case selection

English and Welsh policing offers a rich setting for exploring public actors' perceptions and experiences with diverse types of civic challenge. By its nature, policing continuously gives rise to situations which may result in civic challenges, and there is high variance in the substance of such challenges (Prenzler and Porter, 2016). Civic challenges may concern discrimination, abuse of position for sexual gain, and excessive use of force by street-level officers, slow investigations or lack of updates by investigators, or planning and control decisions. As such, policing is an extreme case among public services for range of voice expressed through civic challenges, and it may thus reveal a more exhaustive set of themes which could apply in other policy fields.

Civilian policing in the United Kingdom is made up of 48 police forces, with 43 territorial forces in England and Wales, a national force each for Scotland and Northern Ireland, and three specialist forces. This provides a variety of organization-level differences in leadership, populations served and priorities as contextual factors which may be relevant for the handling and interpretation of civic challenges.

Civic challenges to policing are channeled through a defined set of processes reflective of the breadth commonly found in systems of administrative justice in general, from internally or externally investigated complaints to civil litigation and judicial review. Variation in procedural handling of different types of civic challenge between police forces is limited by statutory requirements and by a common national architecture for

complaint recording and more serious complaints (which are referred for investigation to an oversight body) and the courts system. At a lower level, outside of issues of potential misconduct or legality, there is more discretion for police organizations in how they handle public complaints.

Finally, learning from accountability processes has been a prominent theme in recent policy reforms, notably the Policing and Crime Act (PACA) 2017, which made a number of changes to the police complaints system to both broaden the scope of what can be complained about and to promote learning. The reforms may be understood as promoting a shift towards the reform potential of learning away from a paradigm of individual blame, with the latter a recognized feature of police accountability regimes also in other country contexts (see for instance Armacost, 2004). The UK reforms are not without controversy, with 'learning' contested as both an aim and a concept in some quarters (Torrible, 2020).

Police forces in England and Wales have been implementing changes required under the PACA reforms in recent years. The reforms and their timing also motivated the selection of English and Welsh policing as the theoretical case for the present study as it makes the notion of learning from civic challenges salient for informants. At the same time, with implementation being recent or ongoing at the time of data collection (November 2021 to October 2022), it was expected that previous national and organizational models for interacting with civic challenges, formal and informal, would still be fresh in the minds of participants if not still in operation, reducing potential

retrospective bias whilst also enabling as full an array as possible of different perspectives on civic challenges within police forces to emerge thanks to the transitional period.

Regarding existing research in this context, Rowe (2020, p.6) reports in a volume on the state of the art in UK police accountability that there has been little insight into how accountability mechanisms like civic challenges may affect and interact with police management, performance or delivery. This further underlines the importance of taking an exploratory, qualitative approach which seeks to understand internal administrative perceptions and experiences with civic challenges and their perceived impacts on an agency, instead of presuming anything ex-ante about organizational learning.

Qualitative data and interpretive approach

The empirical corpus for the present essay comprises 43 semi-structured interviews, for a total of 512 pages of qualitative data. These are summarized in Table 2.1. Interviews were conducted online with police informants of various ranks, policing areas, and functions, across 20 police forces of different sizes covering all of the geographic regions of England and Wales and some other U.K. forces. Three interviews came from staff and deputies of Police and Crime Commissioners (locally elected officials with a mandate to hold their territorial police force to account), and the remaining four interviews were with policy experts with oversight or policy-making interests in the police complaints system.

The interview protocol for police force participants, included in Appendix 2.1, first elicited informants' perspectives and experiences with civic challenges in general, before moving on to their understandings of what it means for a police force to 'learn' from civic challenges, including any examples they can provide, and how often they believe their force is able to learn something from civic challenges.

The sampling approach for interview participants was a combination of purposive and snowball sampling, aiming to maximize variation in perspectives and organizational characteristics while covering key informant roles in civic challenges – namely frontline officers and managers, professional standards departments, legal departments, organizational leaders and members and leaders of different staff networks. The decision to maximize variation was made first of all to increase the likelihood of identifying cases of learning, on the understanding from the literature that it may be a rare occurrence in policing (Schwartz 2011; 2014). Seeking participants across police forces also had access motivations, with the expectation that participants would feel more confident to take part and to share their subjective views (Rowe, 2015) if the research was not a detailed case study of their own force⁹.

The interviews were conducted between November 2021 and October 2022, with participants recruited through channels including direct approaches to forces via general enquiries, emails and phone calls to specific departments (especially professional standards) and national staff associations, contacts made through attending policing conferences and seminars, snowballing and publishing the invitation to participate on

⁹ Securing interviews was in any case challenging due to public complaints being an emotive or controversial subject for many officers (as reported by several participants). This was compounded by a succession of high profile misconduct cases involving serving police officers before and while the data were being collected.

social media (Twitter, LinkedIn and a popular policing online forum). All participants were given details of the study, including informed consent information, to review before an interview in line with the project's institutionally approved ethical protocol¹⁰.

Police legal departments proved the most challenging to access, with only three interviewees having current or recent experience in legal services. As a result, the data provide good coverage of public complaints, some insights into civil claims but relatively little on judicial reviews. This coverage does however mirror the relative volumes of these different types of challenge, with Dunleavy, Bastow Tinkler and Goldchluck, (2010, p424) noting that only a "tiny fraction" of complaints, appeals and the like end up in court.

Interviews were transcribed verbatim by the researcher, for a total of 512 pages of data. I analyzed the interview transcripts through an abductive, thematic analytical approach which combined concept- and data-driven code development (Kuckartz, 2019 p185), sensitized to interpretation and sensemaking-related concepts from organizational learning literature, as discussed in the theory section. Regarding interpretation and identification of themes relating to *learning* specifically, the analysis sought to reconstruct participants' own understandings of learning per se, while also identifying learning-relevant themes based on existing theoretical understandings more implicit in informant accounts.

¹⁰ Reference: FA000309

2.4 Findings

Three aggregate themes relevant to the study's research questions emerged and were successively refined through the analysis, which I term: i) *civic challenge orientations*, ii) *interpretive dimensions and activities*, and iii) *what is (or can be) learned from civic challenges*. This section sets out each of the thematic areas and corresponding categories with illustrative quotes from the interviews.

Civic challenge orientations

Civic challenge orientations concerns perspectives on how civic challenges are (or should be) handled in general. In an abductive approach of moving back and forth between the coding and relevant literature (Ashworth, McDermott and Currie, 2019), several of the civic challenge orientations which began to emerge during first-order coding showed clear correspondences with what have been characterized and studied as 'models' of administrative justice (Mashaw, 2021) in socio-legal studies. For instance, in an influential contribution by Adler (2003), whose six proposed models were labelled bureaucratic, professional, legal, managerial, consumerist and market, such models describe different ideal-type conceptions of what an administrative system should be, including their central modes of decision making, accountability and legitimating goals. They are acknowledged in his and other scholars' work (Mashaw, 2021; Creutzfeldt, 2021) to be plural and competing within public agencies.

Table 2.1 Data sources and uses

Data type	Details	Data uses
Semi-structured interviews	43 interviews; 512 pages of transcripts	<i>Identifying themes in police insider interpretations of civic challenges, including understandings of learning</i>
Regions <i>North (East and West)</i> <i>Midlands</i> <i>West</i> <i>South East</i> <i>Other</i>	<i>9 interviews</i> <i>11 interviews</i> <i>2 interviews</i> <i>11 interviews</i> <i>6 interviews</i>	
Functions <i>Police Officers</i> <i>Police Staff</i> <i>Office of Police and Crime Commissioner</i> <i>Policy experts</i>	<i>26 interviews</i> <i>10 interviews</i> <i>3 interviews</i> <i>4 interviews</i>	
Rank (of officers) <i>Police Constables and Sergeants</i> <i>Inspectors and Chief Inspectors</i> <i>Superintendents and Chief Superintendents</i> <i>Assistant Chief Constables</i>	<i>9 interviews</i> <i>6 interviews</i> <i>2 interviews</i> <i>2 interviews</i>	
Sex <i>Female</i> <i>Male</i>	<i>15 interviews</i> <i>27 interviews</i>	
Documents	<i>44 documents; c. 450 pages</i>	<i>Used for familiarization with the policy context and reforms</i>
<i>Learning the Lessons</i> bulletins by the national body responsible for police complaints	<i>41 documents</i>	
Government consultation documents regarding reforms to complaint system and related Parliamentary transcripts	<i>3 documents</i>	

The administrative models idea provided a helpful way of framing the emerging themes in dispositions towards civic challenges, because they specify central, legitimating ‘goals’ of each orientation and the primary modes of decision making for each in pursuit of those goals. In an abductive step, I thus decided to adapt Adler’s (2003) framework to organize the different normative orientations to civic challenges in police forces,

adjusting them to better reflect the empirical corpus¹¹. The resulting orientations were *bureaucratic, managerial, legal, public-centered* and *social*. I briefly describe these before moving on to learning and defensiveness as other general orientations which emerged alongside them, but which are conceptually different from them.

The bureaucratic orientation reflects civic challenges as a procedure to be followed, with accuracy and neutrality as legitimating goals: "*I have two complaints from two neighbors. The one said we were biased towards his neighbor, and the other one said we were biased towards his neighbor, which in a way makes me feel OK because [laughter] I know that they both think we're on the other side, so we must be doing pretty neutral.*" Complaints and Misconduct Manager, Medium-sized Police Force

The legal orientation views civic challenges as an assertion and balancing of rights. Civic challenges often reflect the police's role as intervenors in inter-personal (e.g. domestic abuse) or inter-group (e.g. public order) conflicts. One informant exemplified this by describing his force receiving a high volume of complaints relating to how it was policing disruptive climate activism, from the competing perspectives that its enforcement was too heavy-handed and not firm enough. The legitimating goal thus includes 'neutrality' as well as legality.

The managerial orientation which emerged views civic challenges as management information on one hand, which may indicate issues with performance, human

¹¹ Adler's (2003) framework focuses on administrative justice as it concerns first-time administrative decision-making, with the relevance of ex-post mechanisms like civic challenges of secondary concern. My adaptation of the administrative models concept is not only in revising some of the models themselves to better fit the present data (see above), but also in applying the concept to the ex-post 'phase' of administrative decision-making, or how civic challenges are/should be handled.

resources, risk or culture, and as a corporate activity or cost center which itself should be optimized in line with performance goals: "[...] fundamentally, this is an HR process. [...] I'm used to interviewing criminals, but this really is an HR process" Detective Sergeant, Professional Standards Department, Small Police Force.

In the public-centered orientation, several informants invoked a long-established policing by consent principle in England and Wales. Here, civic challenges represent feedback, 'citizen' or 'lived' experience, and signal to the police organization public confidence and community relations, (lack of) consent for different practices, and public (mis)understandings about laws, procedures or resource constraints on what the police are able to do. For some participants, they represent a signal from a force to the public as to their openness, willingness to engage, or as an indicator of the organization's 'ethical health' for accountability purposes.

Table 2.2. Civic challenges: normative orientations

Normative orientations	Decision-making mode and normative goals <i>(Adapted from Adler, 2003)</i>
Bureaucratic	Applying rules Goal: accuracy and neutrality
Legal	Asserting and balancing rights Goal: legality and neutrality
Managerial	Managerial autonomy Goal: enhanced performance
Public-centered	Public engagement and participation Goal: public confidence, consent, welfare
Social	Mediation and coproduction Goal: justice; protecting welfare

See Appendix 2.2 for supporting quotes

Finally, the social orientation reflects participants' recognition of the human and welfare dimensions of civic challenges which affect members of the public and police officers, primarily at the level of the individual challenge, but also in terms of the indirect impacts or implications for those connected to them—including family and community on the side of the complainant, and family and colleagues or wider policing on the side of the complained-about officer.

“D’you know, sometimes... All the person might want is an apology. Sometimes they might just want to understand why something happened. And other times they just want to be heard.” Police Sergeant – Learning and Development, Large Police Force

Meanwhile, defensiveness and learning emerged in the coding as two other general orientations vis-à-vis civic challenges. Learning orientations present in the data sometimes imply improvement or change along the dimensions of the administrative models' normative goals – for instance, learning as improving public confidence or efficiency. The *prima facie* aims of a learning orientation thus seems to reflect the idea of improving or changing ‘something’, whereas the administrative model orientations specify the normative values they prioritize. Defensive orientations to civic challenges, meanwhile, reflected self-preservation behaviors at the organization level or by individuals within it, neither of which can be (unambiguously) interpreted as externally legitimating goals. As such, learning and defensiveness do not fit the same conceptual class as administrative models in their lack of substantive, normative aims.

Rather than deducing that learning simply means some form of improvement towards the substantive goals of each administrative model¹², I engaged in a deeper analysis of learning-related codes and informants' examples of learning, to draw out themes in different *purposes* of learning from civic challenges which were implicit or explicit in administrative insider accounts. These are summarized in Table 2.3, reported in line with the Gioia method (Gioia, Corley and Hamilton, 2013).

Control, protect and stabilize: the proprioceptive public organization

Three higher-order themes in learning purposes emerged which illuminate evolutionary parallels of learning (and by association, defensiveness) as orientations towards civic challenges, in contrast to the value systems represented by the administrative models. In the inductive analysis of first-order codes, I labelled these 1) *learning to be accountable*, 2) *learning to minimize risk and harm*, and 3) *learning for external alignment*.

'Learning to be accountable' refers to an aim of better demonstrating alignment with law and policies (for instance, better articulation of what police powers are being used during use-of-force interactions with the public): "*So it's the learning around just sitting with the officers and saying right, if you're going to use force, you need to articulate why. If you [...] can't articulate at the time because of circumstances, you need to be documenting, you know, 'I used Section 3 of the Criminal Law Act because of this'*" (Interview, Large Police Force). In other cases learning to be accountable referred to enhancing supervision or clarifying internal responsibility ("*we assign someone the*

¹² This would already represent a development of the public accountability literature, which has tended to portray learning accountability in managerial terms (Bovens et al., 2008).

responsibility for certain tasks, to make sure they get done rather than just assuming it's all going to happen", Interview, medium-sized force), optimizing processes and responsabilizing front line officers through training and 'reflective practice' processes ("[W]e're still pushing out reflective learning, so we- we want our officers, to- [...] make sure that their behavior, their attitude, the culture, the values, of [Police Force] are [...] considered all the time." Interview, large police force).

The second theme was learning to minimize risk and harm, whether to the organization itself ("*And so we have learned that actually if we make sure we give people the right contact details to start with, and agree on when they want to be updated, and how often, [...] and stick to that, that is a good way of keeping our number of complaints down*" - Interview, medium-size force), to officers, or to members of the public:

"[C]laims against the police [...] led to an evolution in [pursuit] tactics for motorcycles which [...] meant that we would disengage [...] far earlier than we would for a vehicle pursuit, and that was to mitigate against the risk of serious injury of the rider coming off. If they were involved in a police pursuit. And to mitigate against the level of complaints and the nature of civil claims that arose from them." (Interview, large police force)

"I know the public don't like spit hoods, but officers and staff love 'em, [...] because people have had, you know—medical issues as a result of being spat at, so. [...] [I]n the old days we used to put jackets over the top of their head [...] And then they complain they thought they were going to be waterboarded or something, you know, ridiculous, [...] or we were- you know, abusing their rights [...] no, we were stopping you spitting at us. So what else do you want us to do? [...] And I suppose, yeah, the origins were actually complaints from members of the public. [...] we thought 'well, there's gotta be

[...] some bit of kit [...] that's going to resolve both problems'." (Interview, medium-sized force)

The third main theme in learning purposes was learning for external alignment. Here, learning is portrayed as having the effect of bringing an organization into alignment with laws, policies and guidance (for example "eradicating" unlawful practice identified through complaints (Interview, Head of Professional Standards Department, Large Police Force), with external (institutional) actors' expectations ("*we [Office of Police and Crime Commissioner] would look at the location that most of those complaints are coming from, so say 'right, you know there's clearly a problem here, you know, what are you doing about it, [Police Force]?' And then it would be a question of monitoring that, going back to it, and seeing if those complaints will fall over time for that particular area.*" - Interview, Office of Police and Crime Commissioner).

Finally, external alignment also concerned bringing the organization into alignment with public understandings and expectations ("*one that's very relevant at the moment is [...] the expression victim-blaming. Which police forces have been accused of in the past. [...] So, for 30 years [...] we've always had the model of telling people 'lock your doors, else you'll get your house broken into' and we used that exact concept to say 'avoid being alone at night', which is absolutely the wrong message. (...) And it's through public complaints and feedback actually that I think we've developed that message. (...) And turned it round [...] it's really changed the way we do things*" Interview, small police force).

In reflecting on the three themes in learning purposes, I identified an unexpected parallel between them and a nervous system concept known as *proprioception*, or the “sense of one’s posture and movement” which is “essential for the generation of coordinated motor behaviors” (Gutnick, Zullo, Hochner and Kuba, 2020 p.4322). Proprioceptive feedback is relied upon by nearly all motile organisms to control their bodies (Tuthill and Azim, 2018 p.R194), and its main functions are to “stabilize and protect the body” and to refine centralized commands (ibid, p.R198). I saw ‘learning to be accountable’ as reflecting the notion of internal *control* of the public organization; ‘learning to minimize risk and harm’ as reflecting *protection* and ‘learning for external alignment’ as coterminous with *stabilization*. I labelled the second-order themes accordingly and interpret overall insider accounts of why their organizations learn from civic challenges as *proprioceptive learning*, which I define as the public organization’s *adaptive behaviors aimed at controlling and protecting itself* (and relatedly, its workforce and the public) *and aligning with its institutional and societal environment*.

What, then is the conceptual relationship between the normative dispositions towards civic challenges on one hand, and the more evolutionary lens of proprioceptive learning (and defensiveness) on the other? I suggest we may conceptualize proprioceptive learning as relating to signal processing and defensiveness being associated with blocking or ignoring signals which civic challenges engender. Conceptualized as such, we can interpret the administrative model orientations to civic challenges as *potentially receptive* to civic challenge signals, with defensiveness and learning orientations influencing whether, how and why the signals are processed under each.

Table 2.3 Proprioceptive learning: the purposes of learning from civic challenges

Second-order themes	First-order concepts	Exemplary quotes
<p>Control</p> <p><i>Learning to be accountable</i></p>	<p>Demonstrating alignment</p>	<p><i>We're just about to start publishing on our website kind of a 'you said, we did' thing. So, we've got some examples of 'you made a complaint about this, [...] and this is what we've changed as a result of it'. (Interview, small force)</i></p> <p><i>So if you can show [to complainant] someone has done something, they've sat down with their senior officer, they've had some reflective practice, they've learned from it- that helps massively. (Interview, large force)</i></p>
	<p>Optimizing responsibility and supervision</p>	<p><i>As a result of that, [...] we've changed the whole process about specialist departments now, about who investigates what, and rather than a- a job being passed from a different department, it stays with an individual department, so I think that's absolutely fantastic. (Interview, medium-size force)</i></p> <p><i>So simple fix to that is the front desk clerk now creates an incident, which goes on the system, which is managed by our control room, which all supervisors in our districts are responsible for looking after. Then once a supervisor is nominated to go to that member of the public, they put themselves on the incident. So they have an audit trail which supervisor's managed the complaint. (Interview, medium-size force)</i></p>
	<p>Optimizing processes</p>	<p><i>We [...] look and think right, yeah come on, we've got it wrong. Let's put processes in place. (Interview, medium-size force)</i></p> <p><i>[T]he point that was made there, is that somebody's damaged the car when they've been driving it. They hadn't filled in the logbook and then somebody else took the blame for it. So now [the officer's] warrant card [...] goes onto a pad in the in the car. So they know exactly who's driving 'cause it's done on the- on the chip in your warrant card basically, so.. And that's- that's just good housekeeping, really, it's good admin (Interview, small force)</i></p>
	<p>Frontline competence development</p>	<p><i>[...] we'll just watch the officers, and their behavior, and their approach to stop and search. And the community will give their feedback. You know, 'I didn't like the way the officer said that', or 'the officer could have done this slightly better', that's then fed back to the individual officers, and again, if there's themes developing, we'll build that into a kind of stop and search training that we do. (Interview, large force)</i></p> <p><i>When I watch body worn camera footage and I think, oh I really like how the officer dealt with that, because that really helped to de-escalate that situation [...] I'll feed that back in to our personal</i></p>

		<i>safety training, and say 'you might want to use this as an example. You know when you're talking about use of force, de-escalating a [...] potentially volatile scenario' [...] We identify really good practice that we feed back in and use that in training scenarios for the future. (Interview, small force)</i>
Protection <i>Learning to minimize risk and harm</i>	Mitigating risk	<i>We publish a magazine every quarter [...] called Reputation Matters, which comes from [Professional Standards Department]. [It highlights] some of the things that people have got wrong with a view to hopefully make sure nobody else does it wrong. (Interview, medium-size force; emphasis added)</i> <i>[...] And then details of what that learning is, how we can disseminate that learning, the impact of addressing that learning. [...] We could also reduce costs in terms of us having to investigate other similar civil claims coming in – if we don't learn from our mistakes. And you know, save time and investigation. (Interview, medium-size force)</i>
	Prevention of or minimizing harm to the public	<i>I think- that- the areas where [...] we get the most learning [...] organisationally, is the serious end of business [...] We've had several fatal shootings in the last kind of couple of years, you know, they- they've always been treated as you know, lawful killings [...] so it's never ended up with officers being prosecuted, or going through misconduct, but actually there are small elements of learning organizationally that we could kind of improve which may, may have prevented an individual from being shot [...] (Interview, large force)</i> <i>I guess [...] a lot of stuff is [...] from near misses in custody. Where, you know it's... It's [a] pretty life and death situation sometimes where something goes- goes horribly wrong in custody, and if we can improve and try and prevent that [...] Um... Yeah, lots of learning from when it's been a near miss, you know lots of real -or brings it home, sometimes. (Interview, medium-size force)</i>
	Protecting or minimizing harm to officers	<i>Putting in that work at the front end will save a lot of issues later on, so it's just kind of as we training people to pick up their leadership skills, we'll just say actually. But if you do this at the front end... It will save you a lot of time crisis managing later on. (Interview, small force)</i> <i>Had officers put their body worn video on, it would have removed all of this lengthy investigation... So cops – you've got this technology- if it's going to benefit you and benefit the community, turn it on. That's a bit of learning. (Interview, medium-size force)</i>
	Aligning with law and external guidance	<i>A specific example would be pursuits involving motorcycles or mopeds. Where, even if the person has committed a very serious offence, if the police pursuit involves them falling off the motorbike [...] it always results in a civil claim or a complaint against the police [...] whatever your personal view is, the court (.) didn't hold- typically didn't hold the view that they were (.) a villain fleeing the scene, and if they fell off, that was kind of down to them. It was, 'they wouldn't have fallen off if they hadn't been pursued by the police', so the police were liable. (Interview, large force)</i> <i>"[...] we see that actually a force policy doesn't reflect that national guidance. And it's that kind of lack of the reflection of national guidance - or a gap in force policy that's led to something untoward happening... [...] identify that as an area for learning" (Policy expert)</i>

Stabilization <i>Learning for external alignment</i>	Aligning with systems and institutional actors	<p><i>Track- track all the learning that had come out of it- where we were, how we could evidence, 'cause obviously we get inspected by the [inspectorate body]. Yeah, one of their big things was, you know, 'hey, can you evidence that actually anybody picked up you know and [...] changed their methods [...] And it would all be there. We could track it all the way through. And sometimes we just said no, we can't do that. We can't afford it. We just we can't do it. (Interview, medium-size force)</i></p> <p><i>We [...] review, we revise – I went into the [Senior officer] responsible for that area of business and we revised their working hours. So we had constant cover [to match court system hours]. So we never were going to put ourselves in a position where we potentially could miss a [cancellation of a court order], and touch wood – I've not had another claim for that. (Interview, medium-size force)</i></p>
	Aligning with public expectations and understandings	<p><i>[U]ndoubtedly there'll be some recommendations and some learning that's had to come from that because [...] public order policing is huge and you can't just ignore that stuff. [...] I think the role of complaints... You know it's... [...] it's a form of 360 degree feedback. But the thing with policing for me is that we are we police by consent. So again, community and the public outrank all of us. And so the- what's the word? The availability of a complaints process allows us [...] essentially to... Communicate what we do – give consent to, and what we potentially don't. (Interview, large force)</i></p> <p><i>I think [complaints] help. I think they absolutely help. Because, you know - we need that feedback, so getting complaints allows us to look and analyze and understand what those complaints are, and how we can fix them [...] you know, we have to change, we have to modernise, we have to keep up with the way in which the world works, otherwise we just stay static, and we're not equipped to serve the public, so, absolutely, it's essential that we get that feedback, and we can put it right where possible. Or at least, give a rationale as to why it's - you know, what's happened has happened. [...] I think it's vital information. That we can use to get better, and therefore serve the public, which is what we're here to do. (Interview, large force)</i></p>

A novel finding here is in identifying a more concrete range of motivations behind learning from civic challenges, which provides a conceptual basis for further inquiry into where learning from civic challenges is more likely to emerge (for instance internal and external conditions) and why. A second novel finding is the co-occurrence of learning and defensive orientations with different normative orientations. These findings suggest that taking these both model types – evolutionary and normative – into account offers promising routes for moving past the presumption of a learning-defensiveness tension *tout court* (in organizational as well as accountability literature), to more nuanced and substantiated accounts of whether learning accountability does or can happen, and how.

Interpretive dimensions and activities

Next, I turn to the themes in how *individual* civic challenges are interpreted (challenges as cases), followed by how forces go beyond individual cases to identify patterns (civic challenges as accretive data). Important actors for interpreting individual challenges are Professional Standards Departments (PSDs), complaint resolution and organizational learning teams, as well as supervisors in the subject officer's chain of command. Where they have a formal role in carrying out complaint or claim processes or extracting 'lessons' from civic challenges, I consider such actors to have formal *interpretive responsibility* through their mandate for making case determinations. However, it emerges that those with formal roles in challenge procedures or learning mechanisms are by no means only actors relevant to interpretation.

Informants described manifold dimensions along which individual cases might be relevantly compared for internal purposes (including complexity, 'seriousness', public

profile, formality, reliability, clarity and complainant perseverance). These shed light on which dimensions of noise interpreters of civic challenges must contend with. Two dimensions emerged most prominently, however, on how individual challenges are interpreted (formally and informally) within police forces. The first is the public complainant's *motive*, which may be judged to be 'genuine' (or made in good faith) or not. Civic challenges considered by participants to not be genuine are either malicious (including obfuscatory) or opportunistic:

"So there's a diverse range of people who complain [...] some malicious complaints, some opportunistic civil claims, but behind all that are genuine complainants and genuine people who've been wronged. Who deserve to have a positive outcome. And for it not to be repeated." Former Lead on Organizational Learning, Professional Standards Department, Large Police Force

The second theme in the interpretation of individual challenges is *validity*, which concerns the perceived legitimacy of the challenge in terms of its veracity and whether the police are answerable for it. Challenges may be interpreted as invalid because they are *misdirected*, based on *misremembered* events or *misunderstood* police actions. For example, some informants relate that complaints are frequently received regarding decisions outside of the police's control, for instance charging decisions by the Crown Prosecution Service or outcomes at court. Thus, actors within the force may sympathize with a member of the public and recognize their civic challenge as embodying a true problem, but the challenge is not judged as valid as addressed to the police force. Some informants relate street-level approaches to assist in these cases, by redirecting or explaining what the police can do and why:

“[...] what we’re trying to do is [...] if there’s a problem, try and direct them where to go with that problem [...] it’s like a pebble in the lake, isn’t it? So that’s the problem. But the ripples are, well, maybe it’s a neighborhood issue. Maybe it’s a Council issue, or maybe it’s an issue on that street...” Complaints and Misconduct Manager, Medium-sized Police Force

Meanwhile, three themes in *interpretive activities* emerged¹³: *engaging*, *consulting* and *sharing*, and *theming*. *Engaging* refers to interactions with the complainant and subject officer and was highlighted by many informants as an important activity to properly understand the complaint, to humanize the interaction and in some cases, to hasten disposal or resolution (for instance in ‘clearing up a misunderstanding’ or letting the complainant ‘get something off their chest’). Engaging with officers subject to public complaints was often portrayed as a sensitive matter, with several informants criticizing the approach (past or present) their respective forces take on welfare grounds.

“We’ve been very careful about how we approach subjects of complaints directly. [...] we would always go for a line manager and let them know first that we’ve had some feedback [...] they are in a better position to be able to pick the right time, to know if there’s anything else going on in that person’s life.” Head of Public Feedback, Small Police Force

Consulting and sharing refers to interactions those with formal interpretive responsibility have with holders of different types of expertise and discretion. These include internal actors, like operational experts, staff associations, line managers or senior officers

¹³ See Appendix 2.4 for additional quotes.

responsible for a policing area, and front line police (through debriefs and training forums), or external actors like community group representatives (notably in local citizen oversight arrangements), national policing bodies, other police forces, and local partner agencies.

“I take some cases – particularly discriminatory cases, to a community legitimacy panel, I would show [...] the footage, I’d show them statements, evidence, decisions, that sort of thing to get their viewpoint back on it. And to understand their perspective on it.”

Detective Sergeant, Professional Standards Department, Small Police Force

Consulting, meanwhile, is often used as a direct aid to interpretation of individual challenges or trends in challenges. This includes judging key dimensions of individual challenges, particularly where potential misconduct and making ‘threshold’ determinations are involved: *“[...] less clear cut cases [...] when we lift the lid on it, and look into it, there might be some conduct [that] falls out of it. So it could go potentially much more serious [...] But it’s reasonably early on that that will be spotted and brought to the command team for assessment. And then we have that conversation, about where it pitches”* Chief Inspector, Professional Standards Department, Medium-sized Police Force

Consulting also involves identifying patterns by corroborating a possible trend – for example *“[As legal services] [...] we collaborate with [Police Forces X and Y], so you know there have been opportunities where learning has been identified and I’ve gone through to our corporate communications team and said – are you finding this is an issue across the force?”* Lead for civil claims investigations – Legal Services

Department, Medium-sized Police Force

The data suggest that sharing and consulting occurs at varying degrees of formality, and may be ad hoc or part of ongoing engagement at a specific governance level or on a specific theme:

"[...] I sit on the [Violence Against Women and Girls Independent advisory panel]. So I update them on what we're doing, on the lessons that we're learning. And then on any sort of intended training or inputs or something, I sort of use that as a platform of [...] public consultation" Chief Inspector, Professional Standards Department, Medium-sized Police Force

Meanwhile, sharing refers to practices where those with interpretive responsibility share information, experience or knowledge arising from civic challenges with other parts of the force or externally, ostensibly to bring it to other parties' attention or for transparency purposes rather than with an explicit consulting aim: *"I produce a monthly report which goes out to all senior officers [...] it's proving quite popular. Where I show - I spot trends... And show where we're failing in a particular area. And I'll let people know that are responsible for that area"*. Head of Public Feedback, Small Police Force

Alternatively, sharing may occur or be institutionalized so that interpretations might be tested:

"[...] when they get into that situation [...] there is a- a process that we've now established that they will contact a representative from [Ethnic identity group Staff Association]. Who will be best placed to- you know, look at the information and pass some advice." Superintendent, Operations, Medium-sized Police Force

Sharing and consulting are linked as they often co-occur, and sharing practices were portrayed as having shaped interpretation. For example, informants involved in training front-line officers describe instances where bringing certain topics to officers and discussing them enabled the trainer to better understand officers' ways of thinking and their understanding of certain issues:

"[...] That was a really a really good back and forth because we could talk it through. And by the end of it he can understand kind of where I'm coming from. [...] And it gives us an indication of [...] where the issues are, and how widespread they are." Detective Sergeant, Professional Standards Department, Small Police Force

The examples above show that sharing and consulting does not only assist those with 'interpretive responsibility' to interpret civic challenges. It also has a function of assigning or distributing interpretive responsibility. For instance, a senior officer can be drafted into the organization's search for causes and solutions when they are notified of a trend in civic challenges in their area. Sharing and consulting outside of the command and control hierarchy also appears to foster transparency which can enable a sort of fire alarm within and outside of the organization to question developing or working interpretations.

The last main interpretive activity to emerge was *theming*, a word used by many informants with formal interpretive responsibility for civic challenges. This reflected *emergent themes*, where interpretation serves to intuit and explore new patterns and trends in civic challenges; and *established themes*, where interpretation relates more to the matching of cases and trends to the structures and governance arrangements which focus on them.

In informants' accounts, interpreting to identify emergent themes includes finding patterns, trends or clusters at a range of different levels, including individual, team, local, organizational and systemic:

"[...] if there's been an uptick in complaints around [...] public order. We look at where the themes and trends are sitting [...] There's the organizational themes and trends, but also is there an individual in amongst all of that that is always picking up the complaints?" Chief Inspector, Professional Standards Department, Large Police Force

Some emergent themes are outcome-based, as in one stylized example of noticing an increase in incidents of civilians' arms being broken by police baton strikes. In some cases emergent themes are 'generational', concerning particular cohorts of officers or experience length. One learning and development staff member described a puzzle she was analyzing whereby officer complaints in her force were suddenly increasing after seven years of service.

Emergent themes were especially associated with higher volume, 'lower level' challenges which have less formally prescribed handling approaches. The means for identifying and exploring them includes the use of intuition, deliberation and 'comparing notes', interrogating the data manually or through the use of algorithms (for complaint and claims handling software). It also involves connecting different kinds of data and evidence, as well as consulting and sharing (as described above).

Established themes, meanwhile, concern issues with established organizational structures, public discourse and/or procedural and legal requirements. They often include what one informant described as the "serious end of business" like deaths

following police contact, misconduct, and themes like racial profiling and disproportionality, which have deep historical roots in police-community relations in the U.K., as in other national contexts. Several participants implied an important reputational dimension in established themes: "[...] so I think we're pretty good, I would say, at... the more reputationally bigger-themed issues that create [a] lack of trust and confidence in policing" Assistant Chief Constable, Large Police Force

What public organizations (can) learn from civic challenges

I now move to address the question of *what* organizational insiders believe can be learned from civic challenges. The interview protocol included questions relating to learning from civic challenges, including what, if any, examples informants could provide. The interview corpus contains over 75 examples of learning relayed by interview participants. This is not to suggest that learning from civic challenges is generally perceived as widespread or common – the examples include some of failure to learn where the informant perceived that it could or should have happened but didn't, and several participants were circumspect about learning ("*I think we do have a concern that learning has become a bit of a cliché term and seen as a bit of a... 'Yeah, nobody's lost their job, nobody's gone to prison, oh, but there's learning'*", Interview, policy expert) if not emphatic in their view that their force rarely or never learns from civic challenges it receives.

Participants' examples of learning were mostly concrete, recent and local examples, with some historical (particularly regarding 'legacy' issues or focus events in British

policing; namely London's Metropolitan Police investigation of Stephen Lawrence's racially-motivated murder and events like the Hillsborough Stadium disaster). I coded all examples in terms of the 'learning outcome' implied – how informants' own accounts of learning concluded – rather than applying a particular theoretical understanding or definition of either learning or outcome. The resulting codes were then interpreted for *what is*, or *what can be* learned from civic challenges in terms of new or updated knowledge types. Table 2.4 summarizes the main themes which emerged. Broadly, these were *knowledge of the public* and *organizational self-knowledge*.

Under knowledge of the public, knowledge of vulnerabilities and risk factors for harm refers to learning leading to better understandings of risk factors in certain crime types like domestic abuse and child sexual exploitation, but also with policing technologies and approaches, for example the use of body worn video in sensitive contexts and stop and search of minors: *"So, at the moment I'm working with the vulnerability team- who- who receive these end assessments, to see how we can - um, better educate officers, better socialize the issue"* Chief Inspector, Professional Standards Department (Large Police Force)

Knowledge of cultural differences and sensitivity was a second category of knowledge about the public, and included several codes representing what *can* be learned but isn't from some informants' perspectives: *"The most notable one I can think of (.) is the Stephen Lawrence Inquiry. But... that's a lesson that hasn't [...] been learned. Because [...] what we've got now, is the Stephen Port Inquiry. It's a different community, isn't it? But the complaint is the same. That the police had a... marginalized view... on how to*

deal with a situation that affected a community. And it's the same mistake but with a different community" Police Constable, Large Police Force

Knowledge of the public also included knowledge about the public in general (as opposed to groups with vulnerability or cultural distinctions), and generally refers to public (mis)understandings about law, policy and procedures as well as their service expectations: *"What we tend to do is direct people to how to make a complaint, if they need to. If it's something that's just a lack of understanding, and you tend to get common themes on that [...]"* (Interview, small force).

As for *organizational self-knowledge*, police officers necessarily act with a large degree of discretion at the street level. Thus, it is unsurprising that as well as learning about the public, interpreting public complaints can also yield greater understanding of *officer* beliefs, assumptions or behaviors: *"[...] we're looking [...] at compassion fatigue [...] And we're starting to see some patterns and trends there [...] so- if an individual has had a particularly difficult shift, you know, you can see that through that shift their behavior towards members of the public slowly deteriorates"* Assistant Chief Constable, Large Police Force. Organizational self-knowledge also includes knowledge of internal process gaps, as well as knowledge of its gaps with the external institutional system or institutional actors.

Table 2.4 Types of knowledge which can arise from civic challenges*

Second-order themes	First-order codes	Exemplary quotes
Knowledge about the public	Knowledge of cultural differences and sensitivities	<p><i>[We] do have some more challenges in some parts of the county, around white, non-British people, so particularly um, people from Eastern Europe. Whose... experience of policing (.) tends to be quite different (.) to the type of policing that they experience here. And I think that takes a bit of um, flexing and changing from both sides, actually, um, and we've seen that start to change, which is interesting in itself. (Interview, small force)</i></p> <p><i>"[...] we're seeing quite a large element of distrust towards policing from the [force], by the [Religion X] community, because of a number of issues that have occurred recently [...] there's a complaint that's gone and [...] there's a couple of really reputationally damaging issues there, that you know, we have to take the learning from, we- and we have to reflect, and then we have to change the way that we do- do things." (Interview, large force)</i></p>
	Knowledge about public vulnerabilities and risk factors for harm	<p><i>But then there's kind of more medium, longer-term solutions, certainly around things like mental health, um, whereby we're rolling out a, a whole new programme of work to train officers up in, in how to deal with mental health, how to recognise it, working alongside mental health nurses that we have in each of the custody blocks now [...]. (Interview, large force)</i></p> <p><i>But recently, [...] we had some complaints that we weren't handling [...] people with autism very well or very sensitively. So, within our team we realised that we had quite a few people with autism, that were making complaints, we organized for some training. (Interview, small force)</i></p>
	Knowledge about public understandings and expectations	<p><i>Well [complaints] could help. If they were conducted in a- (.) with a different attitude, in order to focus on the learning, and the improvement opportunities that they present, it could lead to positive developments in terms of community relations, understanding the public, what the public wants and needs and expects. Clearer lines of communication to explain police actions. Um, so, develop public support or understanding of the police (Interview, large force)</i></p> <p><i>So one of our biggest public complaints at the moment is lack of updates. [...] Our control room and 10% of calls and emails are asking for updates and officers, on the shift patterns they're on, find it really difficult to update people. And so we have learned that actually if we make sure we give people the right contact details to start with... And agree on when they want to be updated and how often [...] that is a good way of keeping our number of complaints down. So [...] we train that. In in some of our performance management work. (Interview, medium-size force)</i></p>
	Knowledge about officers'	<p><i>That was a really a really good back and forth because we could talk it through. And by the end of it he can understand kind of where I'm coming from. And the rest of the group of sort of then</i></p>

	social behaviors, beliefs and knowledge	<p><i>thinking right, that's pretty unambiguous. I- I know that now. And it gives us an indication of maybe... where the issues are, and how widespread they are (Interview, small force)</i></p> <p><i>On the misconduct side, I mean what we learned was [...] officers who unfortunately exploit domestic violence victims. Male officer, female, high-risk victim – try and strike up a relationship with a vulnerable victim. It's an abuse of position of authority. One thing that we've picked up is that – it tends to be the officer will give the domestic violence victim their personal number. Uh, and often, for some thinly veiled excuse to look, you know, 'police phone's dead', or 'get me on this number if you need me'. [...] Because it- it was just a very easy way for them to- initiate a casual conversation. Almost like phishing. (Interview, large force)</i></p>
Organizational self-knowledge	Knowledge of internal process gaps	<p><i>They followed process [...] actually the force hasn't done anything wrong. But as a whole process – the whole process is wrong [...] So individuals do their job to the best of their ability, but – the process is flawed. So when it comes to it, you look at it- well actually, people have done their best. But what they're doing isn't really what needs to be done, if that makes sense to you. (Interview, small force)</i></p> <p><i>it transpired that our front desk clerks' process if you like was literally write it on a scrap of paper, take it through to the nearest supervisor they could find, give them that piece of paper and say this person's waiting at the desk. If that supervisor happens to get tied up with something else and doesn't communicate to – [...] And that's exactly what happened. And nobody else knew this person was waiting. (Interview, medium-size force)</i></p>
	Knowledge about external institutional gaps and understandings	<p><i>[T]he classic example- we got a lot of complaints that officers were stop searching people and starting to go through their telephone. Well that's against the law. Erm, and what we then subsequently learn is that [Police Force X] have had legal advice that says they can do that. But be- but it's actually against the law. You- they shouldn't be doing it. (Interview, large force)</i></p> <p><i>Or if you found that, this wasn't the case but it's an example, stop-and-searches were habitually abused across [Police Force], then that would suggest an organisational issue in terms of lack of understanding of police powers and how they should be used and implemented [...] (Interview, large force)</i></p>

See Appendix 2.4 for further supporting quotes

2.5 Discussion and conclusion

The three-part taxonomy presented above brings greater analytical structure to the messy reality of how public agencies conceive of and handle the noisy signals civic challenges contain and the types of organizational knowledge which can result. At the same time, it incorporates the lived experiences of public servants to offer a more nuanced understanding of the ambiguities inherent in these processes of citizen-state contestation, in which the meta-concept of learning per se has also been contested (Torrible, 2020). It thus offers a richer picture than could be identified with sole reference to formal complaint or claim handling procedures or principles.

I suggest that the co-occurring ‘normative’ and ‘evolutionary’ civic challenge orientations offer a way past two apparent sticking points in the accountability literature: first, that the notion of learning belongs more to managerialist notions of learning accountability as concerning outcome-based improvement (see for example Bovens et al., 2008¹⁴). The second is the almost deterministic notion that learning from or through accountability is rare – or even a contradiction in terms (see for instance Schillemans and Smulders, 2015) – because public actors are by nature defensive. Participant narratives reflected different and plural understandings of the ends served (or ends which should be served) when handling civic challenges in their organizations.

By elucidating ‘*proprioceptive learning*’ in which civic challenges are stimuli to help the public organization understand its societal and institutional position and posture and

¹⁴ Bovens et al. (2008) discuss the concept of learning in public accountability with its democratic roots, for example in Lindblom (1965) and Easton (1965), but their evaluation framework couches it in distinctly performance-related terms.

thus better control and stabilize itself and better protect itself, its workforce and public welfare, an unexpected and richer understanding of learning emerges. In part, proprioceptive learning would appear to conceptually 'arc back' onto other normative purposes of accountability, namely control and assurance (Bovens et al., 2008). We can also observe that learning cannot be considered as wholly distinct from defensiveness, as it may also be motivated by self-protective considerations (whether at organizational or individual levels). Indeed, the only element of proprioceptive learning which seems to correspond with the idea of an externally legitimating goal (as in the normative dispositions) is that of preventing or minimizing harm to the public or to officers. This finding highlights that organizational interests and the 'public interest' often (and ideally) overlap, but not always.

That a range of orientations towards civic challenges were found to exist and interact in police organizations reflects the multiplicity and also hybridity of accountability logics in the administrative domain generally (Benish, 2020) and in the empirical context, the multi-functionality of police complaints (Smith, 2004; Torrible, 2016). The civic challenge orientations I contribute are novel in suggesting that we may conceptualize learning and defensiveness as higher-level 'switches' or 'modulators' for the signals which civic challenges emit within each of the normative orientations, which in the policing context were bureaucratic, legal, managerial, public-centered and social. It implies that learning and defensive behaviors are likely to have different means and ends depending on the administrative modes and values in operation.

The evolutionary angle brought to the fore by the finding of proprioceptive learning suggests that external environment – institutional and societal – are likely to be

important for whether, how and why learning occurs. Indeed, Tuthill and Azim (2018, p.R198) note that for certain types of animal or situation, sensitivity to proprioceptive feedback stimuli may need to be higher (with a more important role for the peripheral nervous system) or lower (where central commands become more important). More nuanced understanding of the blame-learning tension and – crucially for practice – means of overcoming it may arise if research on learning accountability explores and accounts for differences in administrative models, logics and the public organization’s societal and institutional environment when seeking to describe or explain learning or failure to learn.

Furthermore, by adapting Adler’s (2003) framework, which has had little attention in public administration research (with the exception of contributions like Benish, 2020; Benish and Levi-Faur, 2012) despite being influential in socio-legal (Mashaw, 2021) and public policy literatures, I make a connection with the socio-legal literature where public administration research and theory could fruitfully engage.

A conceptual question which arises from the discussion of civic challenge orientations is whether *not* being open to civic challenge signals only implies defensiveness. It seems likelier that there may be a ‘neutral’ setting between learning and defensive orientations, particularly where the organization lacks structures or competencies for clarifying and interpreting noisy signals from civic challenges (the threshold for which may increase as civic challenges become ‘noisier’).

Meanwhile, in focusing on learning, this study departs from the bulk of literature on police complaints (excepting a critical interpretation by Torrible, 2020, of the learning aspects of the UK’s police complaint reforms). That literature focuses on functions and

complainant experiences as well as 'who investigates' (police or external agencies) (Torrible, 2016). The present study does not engage directly with the notion of misconduct or criminal behavior by individual officers. This is not to disregard identification and sanction of individual wrongdoing as important purposes of civic challenges. Just as learning may inhere to each of the administrative models, so may other accountability purposes.

By focusing on learning as concerning issues with causes above and beyond the individual, street-level officer or idiosyncratic citizen-state interactions, the perspective adopted speaks to Graham Smith's (2004, p27) argument for a separately handled process for 'unacceptable policy' complaints. He argues that patterns which "taken together indicate poor police practice, can have disastrous long-term consequences for police legitimacy and democratic policing principles.... [such complaints] are more concerned with the political accountability of the police" (ibid). The types of knowledge which police participants believe can arise from civic challenge cases or trends in the present study – including knowledge about vulnerability, cultural differences and public understandings and expectations of police practices – indeed support the view that proprioceptive learning may often be *political*. Further research might compare between learning processes and outcomes when the matter concerns integrating new understandings about the wider public's expectations as opposed to knowledge about groups, for example.

The key interpretive activities identified in the policing data (engaging, sharing and consulting and theming) would benefit from deeper exploration. Coproduction would appear to be a useful conceptual lens for those activities involving interactions with

individual citizens (as in engagement with complainants) or groups of citizens (as in consulting with citizen oversight groups) to shape or test interpretations of civic challenges and patterns therein. Read through the conceptual classification of Nabatchi, Sancino and Sicilia (2017), the findings presented here could reflect form of ‘co-assessment’. These authors distinguish between the private or social benefits which may arise from coproduction. Such a perspective could be adopted to further explore these interpretive interactions, for instance to identify best practices for reducing disparities in community confidence in, and access to, complaint procedures as a social benefit.

There have been increasing efforts and calls for civic challenges like complaints, appeals and legal claims to be analyzed to improve public services in recent years (Simmons and Brennan, 2017). However, relatively little has been known about how civic challenges are interpreted in practice, nor what is or can be learned from them based on practitioner perspectives. Studies relating to complaint-led learning or improvement are predominantly set in healthcare contexts (van Dael et al., 2019, Liu et al., 2019). In this essay, I explored these questions in a more novel context – policing – setting out systematic descriptions of civic challenge interpretation and learning in three parts: i) civic challenge orientations; ii) interpretive dimensions and activities; and iii) knowledge types participants believe can arise from learning processes in their organizations. The essay contributes to the nascent literature on *learning* accountability, but also to the broader and more established organizational learning literature, by shedding light on interpretive dynamics for learning stimuli which are contested and ambiguous, as opposed to some more objective sociotechnical ‘failure’. Within public

administration, the essay may also be considered as contributing an administrative sensemaking perspective on citizen-state interactions, responding to the call by Jakobsen et al. (2016) for more direct attention to the latter.

The essay has some important limitations. First, the empirical corpus's coverage was most extensive for *complaints* as a specific mechanism for civic challenges in policing. While reflecting their higher relative volume in practice compared to legal avenues for civic challenges, this is nonetheless a limitation of the data which precluded engaging in comparison between the different mechanisms. Future work should seek to directly compare channels, not least to better assess the construct validity of civic challenges and of learning from them.

A second limitation is its focus on a single country and policy context, which may limit its external applicability. However, policing was selected as an extreme case on the basis of the wide variety of civic challenges it faces. Meanwhile, the different means for channeling such challenges (e.g. complaints, civil claims, judicial review) represent a very standard 'menu' of mechanisms in administrative justice systems (Dunleavy et al., 2010). The expectation is that the findings may thus apply – even if only partially – in other policy settings where we might expect there to be narrower potential consequences from citizen-state interactions, at least where life and limb are concerned (for instance in education, welfare systems or public transport). Indeed, the civic challenge normative orientations presented above elaborated on models of administrative justice which were developed by Adler (2003) based on extensive research in welfare systems. This would seem to indicate the transferability of the findings to agencies in different policy contexts.

While it is possible that the present findings may translate to other frontline public service settings, it is less clear what the implications may be for more arms-length public functions, where direct citizen-state interactions are rare and direct, individual impacts are harder to identify. Likewise, police organizations remain more traditionally hierarchical than many other policy and public service areas of today. The choice of organizational rather than policy or social learning might seem at odds with this dissertation's broader perspective which looks to imagine, describe and explain how bottom-up learning might percolate and spread beyond administrative borders, into public and political domains. Part of the justification for this decision is that the mechanisms which channel civic challenges are still largely built around bureaucracy as the canonical administrative structure. A further avenue for research, ripe for interdisciplinary collaboration with legal scholars, would therefore be to systematically survey how civic challenges can be made within and against diverse agency structures, including different kinds of governance or in (quasi-)private provision of public services.

3. Workforce diversity and organizational conditions for learning accountability: a mixed methods study of complaints against the police

3.1 Introduction

Empirical work exploring *learning accountability* in public service contexts remains embryonic (Schillemans and Smulders, 2015). This is especially the case for civic challenges, or pressures like complaints and legal claims brought by individuals affected by actions and omissions by public organizations through formal accountability channels. This essay poses the research questions: *What organizational conditions favor or constrain learning from civic challenges? And more specifically, Does social representativeness within public organizations affect the nature or likelihood of organizational learning from civic challenges, and if so, how?* A sequential, qualitative-to-quantitative mixed methods approach (Mele and Belardinelli, 2019) was open to the emergence of any themes in organizational learning conditions perceived or implied by public administrators through an exploratory, interview-based first phase, while examining *workforce diversity* as a potential learning condition in particular detail in interviews and through hypothesis testing with quantitative observational data at the organizational level. Workforce diversity is an organizational factor which is often suggested as important for organizational learning and change, but the relationship has had limited empirical attention. As well as its exploratory aims, the qualitative phase was crucial for deriving the diversity-related hypotheses for testing in the quantitative phase, as well as the operationalization of organizational learning based on insider perspectives.

The research design draws on interview data from the wider dissertation project (see Appendix 3.1), with 43 semi-structured interviews with police force leaders, officers, staff and national policy experts in England and Wales. Twelve police interviewees were from ethnic minority backgrounds, fifteen were women, and several interviewees lead or belong to staff networks for minority ethnic staff. The transcript data were analyzed for themes in informants' accounts of how organizational learning from civic challenges happens or fails to happen, by moving between inductive and deductive phases of coding (Miles, Huberman and Saldaña, 2014; see also Kuckartz, 2019). A number of broad organizational learning conditions reflected those recognized in the literature (Moynihan and Landuyt, 2009), leading me to focus on an apparently more novel condition which emerged as "lesson salience and integrity". This refers to perceived barriers in implementing new knowledge when those who must implement (including street-level bureaucrats) have limited or no involvement in the interpretive or institutionalizing processes which produce a new approach or rule. I argue this finding reflects a fundamental feature of learning accountability, where investigation for misconduct-identifying purposes (often necessary for control accountability purposes) necessarily drives a wedge between organizational action and cognition.

Regarding the relationship between social diversity and learning, a story emerges from the qualitative analysis which is part social-psychological and part bureaucratic-political. Focusing on the political reading, where learning from complaints involves competitive dynamics for organizational attention and resources, the quantitative analysis tests hypotheses derived from the qualitative analysis about diversity-related organizational learning conditions using an original panel data set on public complaints about a range

of themes, from racialized and gendered to more 'universal' complaint types. The data were compiled from a range of administrative sources, at the level of England and Wales's 43 territorial police forces and covering the period 2011 to 2018. Informed by participants' accounts, organizational learning outcomes are operationalized as reductions in a particular complaint type (for example, stop and search-related complaints) following a prior increase.

Results of the statistical analyses show cautious support for a representative bureaucracy-style argument that police forces with higher shares of black officers and staff and women are likelier to 'learn' from public complaints about stop and search and discriminatory behavior. At the same time, social group *fractionalization* in the workforce (more distinct and intersecting minority groups or identities as measured using inverse Herfindahl index scores of sex-ethnicity subgroups) is found to have a mitigating effect on such learning. *Concentration* of different social groups in different parts of the organization was found to increase learning from complaint types disproportionately or explicitly affecting minority groups, contrary to the hypothesis that it may indicate a less candid organizational culture. Finally, some tentative support is found for the notion of organizational learning *trade-offs* between themes (namely, between those disproportionately affecting minorities like stop and search and more 'universal' complaint topics like 'general policing standards' and 'operational policing policies'), but also for *complementary* learning themes, with prior 'learning stimuli' of stop and search complaints appearing to increase the likelihood of learning from sexual conduct complaints.

Offering tentative explanations for learning from civic challenges represents a contribution to the public accountability literature, where learning is a less developed line of inquiry compared to incentive-design perspectives, and also to organizational learning. By exploring and testing conditions and processes for learning from a class of pressures which represents contested claims, it enables the elaboration of learning theory which has often focused on more 'objective' failures as learning stimuli.

3.2 Theoretical orientation and literature

I define learning as multi-level processes which change the scope of a public organization's potential behaviors, which are spurred by civic challenges. Two previous empirical contributions are more closely related to the aims and approach of this essay. Schwartz (2011; 2014) explored 'introspection' from litigation in United States police departments. She found that of the few departments which analyzed lawsuits, most were pressured to do so through the legal or political process (Schwartz, 2014 p1092). A quantitative-to-qualitative study by Platt, Sunkin and Calvo (2010) assessed whether being judicially reviewed improved performance in English and Welsh local authorities. Their statistical analysis pointed to modest improvements in a local government performance indicator. Their qualitative exploration emphasized a "public service ethos", including administrators' legal conscientiousness. The present study builds on these contributions by seeking to identify but also test organizational *conditions* under which civic challenges may lead to learning in public organizations.

Organizational learning and workforce diversity

Workforce social diversity has long been a theme of interest in public administration and management more generally (Ricucci and van Ryzin, 2017; Ospina, 2001; Nishii, Khattab, Shemla and Paluch, 2017). Much of the literature makes instrumental arguments for diversity in pursuit of better organizational decision-making. The general idea is that more diverse workforces have a wider range of perspectives which can be brought to bear on problem-solving. The diversity management literature notes that diversity-led increases in perspectives may bring increased conflict if not managed appropriately (Choi and Rainey, 2009), which may curtail the potential benefits of diversity for decision-making.

On the basis of these arguments, I explore the relationship between workforce diversity and learning from civic challenges. I adopt *cultural candor* as a key analytical construct for the qualitative analysis, taking inspiration from Ely and Thomas' (2001) diversity management paradigms in which cultural openness is a requisite feature of a 'learning and effectiveness' diversity paradigm. Candor is also argued to be important for organizational learning more generally (Moynihan and Landuyt, 2009, p1100).

3.3 Research strategy

Empirical context: English and Welsh policing

English and Welsh policing is an ideal context for exploring whether and how workforce diversity relates to learning from civic challenges. In US policing, Sklansky (2007b, p2) observed the increased social diversity of US policing from the 1970s to the 2000s,

describing police departments as “marked by less consensus and more debate” between responding to call-outs (when instead, “blue is blue”, Sklansky, 2007a p578). In English and Welsh police forces there have been substantial but uneven increases in the presence of women and ethnic minorities in recent decades (Hong, 2017). English and Welsh policing has long had a fraught relationship with issues of race and sex, both within police forces (Loftus, 2008) and with communities they serve (Rowe and Macauley, 2019). The variation of ethnic and gender diversity across policing organizations’ workforces and over time, and their day-to-day and historical salience all provide an opportunity to explore—by qualitative and quantitative means—the potential role of diversity and other organizational factors in learning from civic challenges.

Qualitative-to-quantitative mixed methods research design

The study adopts an exploratory-to-explanatory research design (Mele and Belardinelli, 2019). Organizational learning may occur at different levels and be more or less formalized, if it occurs at all. The potential role of workforce diversity is unclear ex ante. Detailed qualitative insight increases the likelihood of meaningful hypotheses and operationalization (Belardinelli and Mele, 2020 p36), while quantitative analysis may help to corroborate qualitative findings. Table 3.1 summarizes the research design. The qualitative phase used the empirical corpus from 42 semi-structured interviews whose planning and execution is described in more detail in Section 2.3. The aims of the qualitative phase were two-fold: first, exploration of possible organizational conditions for learning from public complaints and the relationship between learning and workforce social diversity specifically, with the possibility of theory elaboration if findings lent

themselves to modification of existing theories (Ashworth et al., 2019). The second aim was to inform hypothesis development and operationalization for testing workforce diversity's relationship(s) with such learning.

The interview protocol elicited perceptions of civic challenge-led learning, workplace cultural candor, and workplace 'diversity' relations. The interview data were interpreted using an abductive coding approach (Ashworth et al., 2019; see also Kuckartz, 2019). Moving between participant recruitment efforts, interviewing, transcribing and interpreting, opportunities were taken to review the interview protocol and interpretation memos, to guide the targeting of participant recruitment and to engage in reflexive bracketing (Finlay, 2002).

The aim of the quantitative phase was triangulation of the qualitative findings on the relationships between workforce diversity and organizational learning. It was an important research design choice given that social difference and diversity often have unconscious or concealed effects on individual and group behavior which may be difficult to access through qualitative methods (Rowe, 2015; Loftus, 2008). The qualitative inquiry provides an opportunity to shed light on possible workforce diversity 'dynamics' as made explicit or implicit in informants' individual perspectives on inter- and intra-group relations at the sub-organizational level. Meanwhile, the quantitative analysis allows such dynamics to be tested statistically across organizations, which vary in their degree and types of workforce diversity. The analysis uses administrative data on all territorial police forces in England and Wales (N=43) between 2011-2018, brought together from a range of administrative sources, with the addition of original panel data

on body worn cameras per police officer by police force-year.¹⁵ Following the quantitative organizational learning literature (e.g. Haunschild and Sullivan, 2002; Desai, 2019), the hypothesis testing entails interaction models with force and year fixed effects to observe the significance of learning condition variables in interaction with police forces' past incidence of different types of civic challenge.

There are clearly differences between learning from the socio-technical kind of failures which arise in transport industries and those which come from more subjective and contested pressures like civic challenges. Torrible (2020) critiques the UK's reforms to orient the complaints system toward learning on such grounds, while the challenge of measuring learning more generally is widely recognized (cf. Moynihan and Landuyt, 2009). A mixed-methods approach is valuable in enabling triangulation of findings, but quantitative results must in any case be interpreted with caution.

3.4 Analysis and findings

Qualitative findings

Six organizational learning conditions were identified in informants' examples and understandings of learning from civic challenges. All but one corresponded at least loosely with learning conditions identified by Moynihan and Landuyt's (2009) synthesis of broad structural and cultural theoretical approaches to organizational learning—namely *information flow and sharing* (learning forums in Moynihan and Landuyt), *ownership and supported discretion* (decision flexibility, *ibid*), *resource sufficiency and*

¹⁵ A detailed summary of quantitative variables and their associated data and sources is provided in Appendix 4.

continuity (adequacy of resources), *systems and structures* (information systems, learning forums) and *intrinsic motivation and morale* (mission orientation).

Table 3.1. Phases of sequential mixed methods design with their links and aims

Phase	Qualitative	Quantitative
Method and data	<p>Informants recruited through purposive and snowball sampling from a range of English and Welsh police forces.</p> <p>42 semi-structured interviews eliciting:</p> <ul style="list-style-type: none"> • Accounts of how and when learning from civic challenges happens; • Perceptions of organizational cultural openness, working relations between men and women, different ethnic groups 	<p>Longitudinal interaction models with police force and year fixed effects.</p> <p>Dependent variables: force-level change in the same challenge type</p> <p>Key independent variables: change in number of different public complaint types; workforce diversity measures (ethnicity and sex at organizational and sub-organizational levels), organizational size, number of body worn cameras per officer</p>
Overarching aims	Theory elaboration; inform quantitative design	Hypothesis testing
Link between phases	The qualitative phase informs hypotheses, operationalization of key independent and dependent variables, the selection of control variables.	

Lesson salience and integrity emerged from the data as a condition which did not clearly correspond with any of the broad categories synthesized by Moynihan and Landuyt (2009). This reflected a learning condition which applies at the stage of embedding new and updated knowledge among street level officers through training or top-down direction. Learning was perceived as more likely when the ‘lesson’ to impart at the frontline is perceived as more relevant, trusted and contextualized. Integrity applies in the sense of trustworthiness, but also of ‘wholeness’¹⁶:

"[...] the [ombudsman] publishes learning the lessons bulletins [...] sometimes they do it on a particular theme, or general. We then replicate that by digging out some stuff as well, because people love pictures and real stories. Real life stories. That's the way to get the message over." Police Staff - Professional Standards Department, Medium-size Police Force

The data under this theme also suggest learning is likelier when ‘lessons’ come integrated with positive examples and feedback. One police force has taken an innovative approach of integrating the ‘good with the bad’, transforming its model for lower-level complaint handling. In this model, low-level complaints and positive feedback are all fielded and analyzed by the same public feedback team:

"[...] there was a sense that maybe this was a part of policing where we were underperforming. It was only through analyzing thank yous that we saw that we got lots of thanks for roads and traffic. And we realized that it's not an error or failing. It's just a very emotive issue for the public." Head of Public Feedback, Small Police Force

¹⁶ See Appendix 3.2 for supporting quotes.

Table 3.2. Summary of interviewee and organizational characteristics

Individual characteristics	Number of interviewees
Sex	
Female	15
Male	27
Ethnicity	
Asian	6
Black	5
White	29
Other	1
Length of service	
<5 years	6
5-9 years	5
10-14 years	4
15-24 years	15
>25 years	10
Rank	
<i>Police Constables and Sergeants</i>	10
<i>Inspectors and Chief Inspectors</i>	11
<i>Superintendents and Chief Superintendents</i>	3
<i>Assistant Chief Constables</i>	2
Police force characteristics	
Size (workforce)	
Small	7
Medium	17
Large	14
Complaints per officer - quartile (2020-21)	
1	18
2	3
3	5
4	6

Social diversity and learning from civic challenges

I explored the relationship between workforce diversity and learning by searching across and within code groups for links between social diversity, organizational cultural candor and civic challenges. Cultural openness related to workforce diversity in the data in two main ways. One is a social psychological perspective in which being socially

different from the 'mainstream' or majority may compound a felt (or actual) infeasibility or unacceptability of sharing conflicting viewpoints due to assimilation dynamics.

Informant accounts suggest that minority staff may be likelier to experience ostracism if they raise dissent. In some cases, informants indicate organizational socialization and motivations for women and/or ethnic minority staff to assimilate with the 'mainstream' group in its behaviors to fit in: *"[...] some people can double down on discrimination sometimes 'cause they wanna be part of that group. Other people just get exhausted and completely withdraw because they're not seen, they're not understood, and others escape... like I did and go and work at headquarters and find some like-minded people."*

Police Sergeant - Learning and Development, Medium-sized Police Force

Many informants discussed diversity in terms of organization-level discourse and sets of initiatives, policies and values. I refer to this generally as 'diversity as a meta-concept', to capture the notion of diversity management as well as themes such as the role of staff networks in advocating for group-based interests in internal and sometimes external matters, and the more politicized aspects of diversity.

The increasing salience of diversity and normative fragmentation within police organizations has been an important source of internal conflict (Loftus, 2008).

Exemplary of this conflict were the renewed calls in the wake of the Black Lives Matter movement for police leadership in England and Wales to formally admit to the existence of institutional racism in the Police Service, which was debated privately within the National Police Chiefs' Council (Dodd, 2021) but ultimately decided against in favor of a commitment to being 'institutionally anti-racist' in a national Police Race Action Plan

(Dodd, 2022). Several participants made reference to these, and similar, debates and their sensitivity for the wider workforce:

"Well if you say institutional racism doesn't exist, and you don't accept it as a label, then you're never gonna get rid of the problem, are you? [...] the other leaders before [...] even if they didn't believe in it, they still know they have to manage and navigate the expectations of a multi-diverse staff of nearly [XX thousand]." Inspector and Chair of a staff network, Large Police Force

In terms of leaders expressing support for diversity as a corporate value or aim, dedicating attention and resources to diversity-related issues through setting up structures, forums and roles, and the growing presence and influence of staff associations, diversity as a meta-concept may create opportunities for minority voice or dissent:

"There's been more... people not afraid to speak up and say well I'm from this background, and also the fact that there's been such an uplift with the type of people the force employs. People from different ethnic backgrounds [...] Things like [Staff Association] coming into play [...] People having gender networks, race networks [...]"
Staff member of Legal Services and chair of a staff network, Medium-size Police Force

However, informants' accounts also reflect the political aspects of these developments, with internal conflict concerning factors including professional identities, competing values, biased attitudes and competition for organizational resources, not only between minority and majority groups but also among minority groups themselves:

"So in working with the mainstream, the difference for us as visible ethnic minorities is that race and faith is always loaded with politics and therefore sometimes with hostility [...] so the fact that you are focusing on black people all of a sudden well, 'hang on, we're important as well'." Inspector in frontline policing with leadership role in a staff network, Large Police Force

I think severe cracks started appearing when it – when the national Race Action Plan came about and [...] the primary focus was on black people. Or black African, black Caribbean or black mixed. That is where a lot of division came from, the Asian heritage officers [...] felt actually hard done by and left out." Chair of a staff network, Large Police Force

These findings collectively point to an important bureaucratic-political dynamic in the relationship between social diversity and organizational learning (where a civic challenge stimulus leads to some form of organizational or policy reform). In the next section I derive hypotheses for testing with quantitative data at the police-force level.

Hypothesis development and operationalization

Many informants considered learning from civic challenges to be indicated by future reductions in civic challenges of the same type: *"[...] I wouldn't keep seeing claims of a similar nature coming through [...] It's quite difficult sometimes to measure what you potentially have prevented. And so it is a difficult one [...] if I didn't disseminate this learning, what potentially could that impact? Well, similar claims of a similar nature..."*

Lead for civil claims investigations - Legal Services Department, Medium-sized Police Force

I operationalize learning as the change in annual volume of a given civic challenge type from two years before to the year of observation, *conditional on* a prior (t-3 to t-2) change in the complaint type. In other words, if discrimination complaints saw an annual increase two years ago, and this is significantly related to their having decreased from then until today, this is cautiously interpreted as indicating organizational learning.

The qualitative analysis presented a complicated picture for the role of social diversity in organizational learning from civic challenges. The bureaucratic-political implications of diversity may create opportunities for underrepresented groups to raise issues and have organizational attention and resources dedicated to those issues. From a learning perspective this has different implications. Learning from perspectives raised by one or more groups with different interests or priorities within the workforce implies a reordering of finite organizational attention and resources, all else being equal. This suggests that workforce social diversity not only affects *whether* or not learning happens and how effective it is, but that it also affects *what type* of learning occurs.

To the extent that staff have a special interest in how their organization serves or treats groups that they belong to, civic challenges concerning individuals from those groups are likelier to inspire interest and investment when the workforce is more representative of those groups. This is evidenced in the qualitative data by several accounts of staff networks seeking to influence their organizations' responses to incidents affecting members of the public from the same minority group, or to be involved in decision-making processes (like vetting) affecting staff from the same group. This is a representative bureaucracy-style argument, applied to learning:

H1: Police organizations with higher minority representation are more likely to learn from civic challenges which disproportionately affect members of the public from the same groups.

To test this hypothesis, I use data on public complaints with racialized and/or gendered dimensions to operationalize the learning 'stimulus' and outcome, namely complaints regarding stop and search and discriminatory behavior.

Informant accounts implied political dynamics of diversity in terms of competition for organizational resources and attention. 'Group-based' designation of resources or attention were suggested as having the potential for conflict and resentment among other groups (see for instance the quote above regarding the Race Action Plan). This may have the effect of constraining learning on group-based issues. Hypothesis 2 tests whether the learning hypothesized to result from social diversity is associated with lower learning from other types of civic challenges:

H2: Police organizations with higher minority representation are likelier to learn from civic challenges disproportionately affecting the same minority groups, relative to their learning from other civic challenge types.

The qualitative findings indicated that competition may arise within and between minority groups of staff in learning from civic challenges. Hypothesis 3 tests whether greater 'social fractionalization' (in terms of a greater number of different under-represented social groups) is associated with a lower likelihood of learning:

H3: Police organizations with greater social fractionalization are less likely to learn from civic challenges.

I operationalize social group fractionalization at the organizational level using an inverse Herfindahl-Hirschman Index calculation, on the basis of ethnic-sex subgroups. The underlying social diversity data were taken from a Home Office data release on ethnicity in policing from 2007-2019.¹⁷ There are five ethnic groupings in the data: Asian, Black, Chinese and other, Mixed, and White.¹⁸

Meanwhile, to test the social psychological perspective on diversity and learning, informants' accounts suggested that a more general distribution of under-represented staff across organizational divisions is indicative of greater cultural candor. This gives rise to the following hypothesis:

H4: Police organizations with more concentrated social diversity across functions are less likely to learn from public complaints.

I operationalize the concept of concentration for each police force-year by calculating the difference between the degree of 'fractionalization' (as described above) between two major sub-organizational functions; ranked police officers and police staff. I square the difference such that higher scores indicate greater concentration of different social sub-groups in either the staff or the rank and file, with lower scores indicating that groups are more evenly distributed within the organization.

¹⁷ Accessed July 2022 at <https://www.ethnicity-facts-figures.service.gov.uk/workforce-and-business/workforce-diversity/police-workforce/latest>

¹⁸ All shares of different groups are calculated based on the sum of Full Time Equivalents where ethnicity and sex are stated (i.e. I exclude 'not stated' from calculation of workforce shares).

Quantitative analysis and findings

Dependent variables for testing the hypotheses are the two-year change in different complaint types at the organizational level, as discussed in the section above on operationalization. The variables are constructed using national level statistics provided under Freedom of Information by the Independent Office for Police Conduct, which gave a granular breakdown of annual recorded complaint types (which police forces report according to a national reporting framework) by each of the 43 territorial police organizations between 2010/11 and 2019/20. Table 3.3 contains a summary of the complaint types used in the analysis which follows.

To test Hypothesis 1, I use the two-year change in discrimination complaints (as a civic challenge type which is explicitly 'diversity-related') and in complaints regarding stop and search (a police power long contentious for racial disparities in its use, Quinton, 2015) as dependent variables. The hypothesis test is in the sign and significance of the interaction term between prior changes in the same complaint types (from year $t-3$ to $t-2$) and the share of the organization's workforce which is female, black or a larger ethnic minority aggregate (Black, Asian and minority ethnic). Tests of Hypotheses 3 and 4 are carried out as part of the same estimations, with fractionalization and concentration (at $t-1$, or during the 'learning period') as independent variables interacted with the prior growth in complaints as the learning 'stimulus'.

Table 3.3 Complaint types used as dependent variables by hypothesis

Complaint type	H1	H2	H3	H4
Stop and search*	x		x	x
Discriminatory behavior	x		x	x
General policing standards		x		
Operational policing policies		x		
Operational management decisions		x		
Corruption or malpractice		x		
Incivility, impoliteness, intolerance		x		
Sexual conduct (other)		x		
Fairness and impartiality		x		

* Breach of Code A PACE on Stop and Search

Hypothesis 2 – that learning from civic challenges disproportionately affecting protected groups will occur as a substitute to learning from other types of challenges – is instead tested with a range of different complaint types as outcome variables. Four of these may be understood as more universal in their incidence on the population served: general policing standards, operational management decisions, operational policies, and corruption or malpractice. Three others have ‘diversity dimensions’ which are explicit (as in sexual conduct complaints) or which may involve disparities among groups – as in ‘incivility, impoliteness and intolerance’ and ‘fairness and impartiality’ complaints. Here, the hypothesis test is in the interaction term between the prior change in the same complaint type as the learning stimulus (for example, the growth in complaints about operational policies from t-3 to t-2), and the change over the same period in either stop and search or discrimination complaints as a ‘competing’ learning stimulus.

Table 3.4 contains summary statistics for the main variables used. Appendix 3.4 contains the correlation tables. As well as the prior change in complaint types as the learning stimulus and minority representation, fractionalization and concentration as covariates, a number of controls are used. These are organizational size at t-1, as measured by the total full time equivalent (FTE) headcount, deprivation scores for the population served by the organization, the logged size of the local population, the share of the local population which is Black, and whether or not an election is scheduled for t+1 for the locally-elected role of Police and Crime Commissioner.

Finally, original data were gathered on the roll-out of body worn cameras across English and Welsh police forces. Body worn video was one of the most frequent unprompted topics raised by interview participants while sharing their perspectives on how public complaints are handled and learned from. For nearly all informants raising the topic, it was seen as 'game-changing' in terms of its resource implications for reducing what are perceived as malicious or opportunistic complaints, for hastening resolution or investigation of 'valid' complaints, and as a helpful resource for community scrutiny and officer training purposes. There has been significant research interest in body worn cameras from a number of perspectives and disciplines, including their relationship with complaints (Lum, Stoltz, Koper and Scherer, 2019). In the absence of existing longitudinal data on the adoption and roll-out of body worn video, I gathered these data through searching national and local online news media for reporting about the introduction or increased investment in cameras, as well as published freedom of information returns. The data collected were 'total number of cameras' by police organization-year.

Table 3.5 presents results of three random effects regressions with the two-year, organization-level change in stop and search complaints as the dependent variable. Table 3.6 presents six fixed effects¹⁹ regressions with the change in discriminatory behavior complaints as the dependent variable (the first three of which use gross complaints, and the second three complaints per officer). Figure 3.1 shows the distribution of each of the change in gross complaints for each complaint type.

Hypothesis 1 is tested in the first column of Table 3.5 for stop and search. The negative and significant (at the 5% level) coefficient on the interaction between forces' recent experience with stop and search complaints with the share of the workforce (officers and staff) which is Black at t-1 (as the assumed 'learning period') is supportive of the representative bureaucracy-style hypothesis. The results suggest that of those forces which experience a greater uptick in stop and search complaints, a later reduction in such complaints will be greater when there is a higher share of black personnel. More specifically, it suggests that a percentage point increase in the black share of the workforce reduces stop and search complaint growth by 36 complaints²⁰.

¹⁹ The decision between random and fixed effects estimation in all cases was based on the results of the Hausman test.

²⁰ N.b. the black share of police workforces ranged from less than half a percent to 2.1% in 2022, excluding the Metropolitan Police (3.6%). A percentage point is thus equivalent to at least doubling the black share of the workforce.

Table 4. Summary statistics

Variable	Mean	S.D.	S.D. within	S.D. between	Min	Max	N	n	Tbar
Number complaints recorded in year t	774.793	959.436	187.9421	951.1180	174	7493	420	42	10
Number complaints per capita (all staff)	0.1668	0.0545	0.0358	0.0416	0.048976	0.4002	420	42	10
Growth in stop & search complaints (gross) (t-3 to t-2)	-0.8386	9.8273	9.4917	2.5738	-96	85	378	42	9
Growth in discriminatory behavior complaints	0.3280	18.1132	17.7045	3.8674	-153	125	378	42	9
Growth in oppressive behavior complaints	-4.0265	29.4368	28.3779	7.9086	-219	131	378	42	9
Growth in general standards complaints	-1.2897	13.2659	12.4601	4.5991	-95	66	252	42	6
Growth in operational policies complaints	-2.2180	12.2607	11.4364	4.4263	-78	49	211	43	4.907
Growth in operational management complaints	-1.0675	7.2518	6.9654	2.0383	-67	41	252	42	6
Growth in incivility and intolerance complaints	-20.3264	73.1117	61.7387	39.1974	-373	351	337	43	7.837
Growth in fairness and impartiality complaints	0.3769	38.3041	37.2646	9.5358	-229	153	337	43	7.837
Growth in other sexual conduct complaints	0.1335	3.5969	3.5652	0.4922	-39	37	337	43	7.837

Deaths following police custody	0.3857	0.6969	0.5911	0.3732	0	5	420	42	10
Fractionalization (sex and ethnicity)	0.4852	0.0281	0.0095	0.0267	0.378929	0.579	462	42	11
Concentration between organizational functions (ethnicity-sex pairs)	0.0837	0.2530	0.0388	0.2527	4.17E-06	1.9843	462	42	11
Proportion of workforce which is BAME	0.0339	0.0296	0.0049	0.0295	0.006758	0.1888	462	42	11
Asian officers and staff (%)	0.0151	0.0166	0.0031	0.0165	0.000374	0.0857	462	42	11
Black officers and staff (%)	0.0060	0.0088	0.0007	0.0088	0	0.0589	462	42	11
Chinese & other ethnicity officers and staff (%)	0.0027	0.0035	0.0006	0.0035	0	0.0255	462	42	11
Mixed ethnicity officers and staff (%)	0.0102	0.0052	0.0019	0.0049	0.002002	0.0347	462	42	11
White officers and staff (%)	0.9661	0.0296	0.0049	0.0295	0.811163	0.9932	462	42	11
Force diversity - female officers & staff	0.6174	0.0347	0.0138	0.0321	0.513185	0.7213	420	42	10
Total workforce (officers & staff)	5035.425	6724.16	669.3138	6764.5351	1455.62	52515	462	42	11
Body worn cameras per officer	0.1570	0.3001	0.2713	0.1659	0	1.4525	317	42	7.548
Local deprivation - 3y average*	0.1608	0.0288	0.0112	0.0268	0.11	0.2100	378	42	9
Population of Police Force Area (000)	1371.012	1268.25	59.990	1280.656	494.400	8952	420	42	10

* % individuals in households with less than 60% of median 2010-11 real income, 3 year average. See Appendix 4 for data sources.

Table 5. Random effects - correlates of learning from growth in stop and search complaints

	1	2	3
Growth in stop & search complaints (gross) (t-3 to t-2)	-0.216 ⁺ (0.112)	3.832 ⁺ (1.969)	-2.962 ⁺ (1.610)
Black % of workforce (t-1)	85.36 (259.0)	133.2 (256.6)	106.7 (260.1)
Women % of workforce (t-1)	1.837 (12.99)	2.418 (12.87)	1.025 (13.04)
Concentration between functions (t-1)	7.834 (8.708)	8.070 (8.613)	7.436 (8.748)
Fractionalization (t-1)	-20.08 (21.00)	-18.74 (20.75)	-18.11 (21.13)
Growth in stop & search complaints (gross) (t-3 to t-2) # Black % of workforce (t-1)	-36.24* (17.32)		
Growth in stop & search complaints (gross) (t-3 to t-2) # Concentration between functions (t-1)		-3.821* (1.778)	
Growth in stop & search complaints (gross) (t-3 to t-2) # Fractionalization (t-1)			5.241 (3.288)
Workforce size (t-1)	0.000267 (0.00050)	0.000274 (0.000494)	0.000282 (0.000503)
Body cams per officer (t-1)	1.018 (1.539)	1.079 (1.534)	1.085 (1.545)
Deprivation in population served	-2.871 (16.51)	1.032 (16.36)	-3.451 (16.60)
Population share - Black	-79.59 (92.73)	-94.00 (91.81)	-83.58 (93.13)
Log size of population served	-2.747 (2.150)	-2.609 (2.124)	-2.792 (2.160)
PCC election year=1	-4.103* (1.209)	-3.857* (1.211)	-3.987* (1.214)
Observations	208	208	208

Standard errors in parentheses; ⁺ $p < 0.10$, * $p < 0.05$

Dependent variable is change from t-2 to t-1 in gross complaints about stop and search (specifically, Breach of Code A PACE on stop and search")

All specifications include year dummies and exclude observations from London's Metropolitan Police

For discriminatory behavior complaints in Table 6, H1 is tested the same way in the first column for gross complaints, where the interaction term between past change in discrimination complaints and the share of the workforce which is black is negatively but only weakly related ($p < 10\%$) to the time t trend in discrimination complaints. In columns 2a and 2b, the hypothesis is supported when measuring discrimination complaints per officer rather than gross complaints. The coefficient is negative and significant at the 5% level for the interaction between the past change in discrimination complaints per officer and the black and more general ethnic minority share (i.e. Black, Asian and other ethnic minorities) of the workforce, respectively. That the coefficient is significantly larger (-29.6 versus -7.7) for the interaction with the black share of the workforce as opposed to the aggregated ethnic minority share might also be read as indirectly supporting Hypotheses 2 and 3, which relate to trade-offs in learning types and inter-group competition in processes of learning from civic challenges.

The second column of Table 6 similarly finds support for H1 with women's share of the workforce, suggesting that a percentage point increase in women's share of the workforce increases the 'learning stimulus' of the force's past growth in discrimination complaints by around 8 complaints.

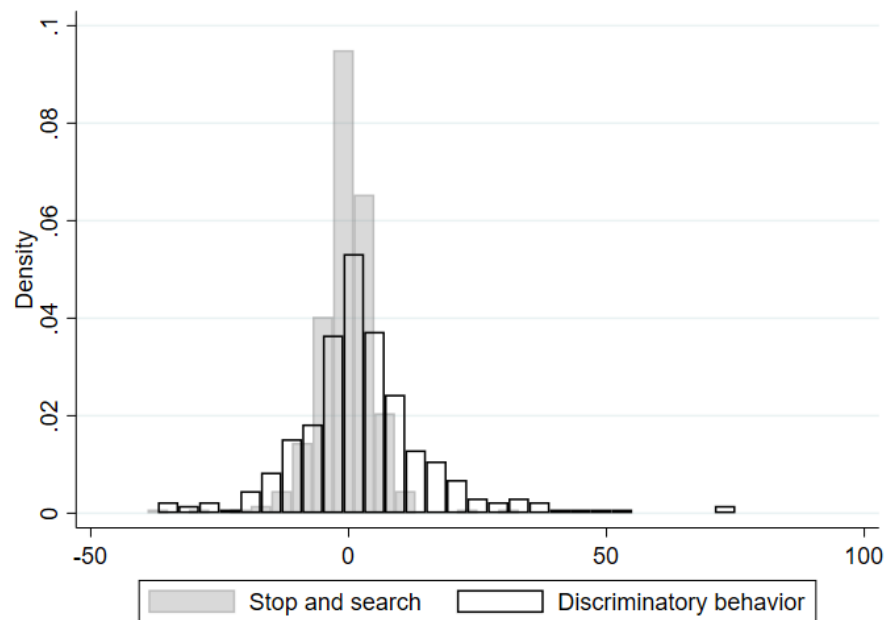
Hypothesis 3 is tested in Table 5, column 3 for stop and search complaints, where social group fractionalization does not have a significant relationship with 'learning' from recent growth in stop and search complaints. Meanwhile, some support is found for the

hypothesis for discrimination complaints (column 2c in Table 6), where social fractionalization has a positive and significant (at the 5% level) interaction with the change in discrimination complaints two years prior. In other words, a one-point increase in the fractionalization measure makes prior increases in discrimination complaints likelier to be followed by further increases. These results offer mixed support for the hypothesis that social fractionalization reduces the likelihood of learning from civic challenges. However, combined with the finding that the 'learning effect' appears stronger for stop and search complaints as police forces' shares of black employees increase, compared to ethnic minority employees in general (which is the same sign and significant), this suggests that fractionalization may be a factor which i) weakens the learning effects of greater social diversity without necessarily counteracting them, and/or ii) expands the scope of learning preferences or targets within the workforce such that learning on a narrower theme of public complaints (for example, stop and search or discrimination) is reduced – but potentially increased over a broader array of themes.

Hypothesis 4 is tested for stop and search in Table 3.5, column 2 in the interaction between the 'learning stimulus' and social group concentration. Contrary to H4's prediction, the results suggest that social group concentration (between police staff and the rank and file) is a factor which increases the effectiveness of the learning stimulus for future stop and search complaints ($p < 5\%$). A similar result is found for learning from discriminatory behavior complaints in Table 3.6, column 3. Where the hypothesis was developed under the assumption that lower concentration of different social groups

(ethnicity and sex) within different parts of the organization is indicative of a more candid organizational culture, the results could suggest that internal organizing or coalescence around a learning theme of shared interest by members of a particular social group may be facilitated where group members are more proximal in the organization.

*Figure 3.1. 2-year change in complaints concerning stop and search and discriminatory behavior**



** All force-years between 2010-11 and 2019-20 excluding the Metropolitan Police*

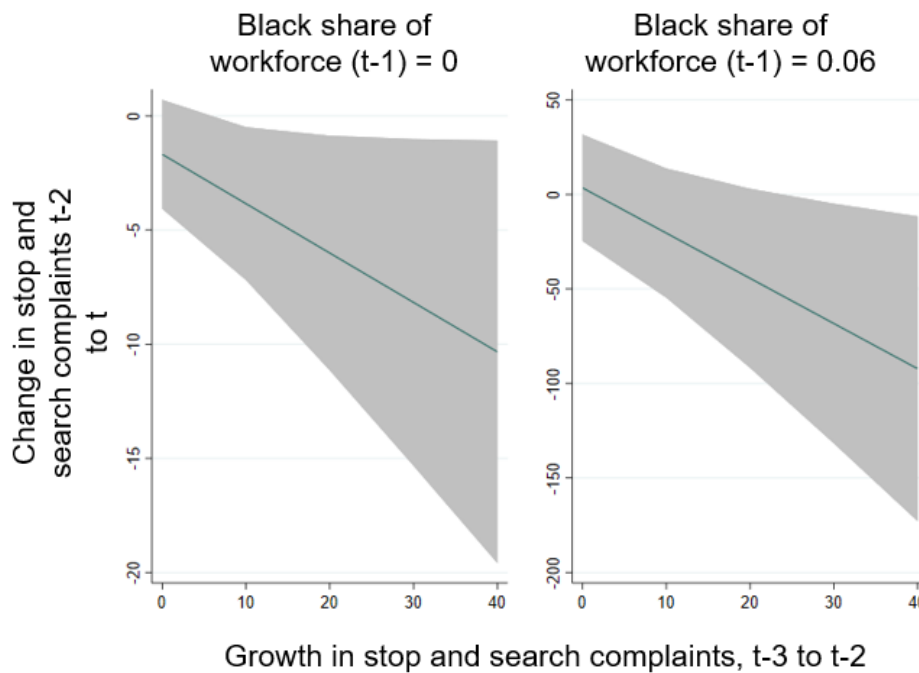
Hypothesis 2 concerns the notion that learning within organizational resource and attention constraints on themes which especially affect members of the public from certain social groups will occur in trade-off with other forms or areas of learning. I test

this 'relative learning' notion by continuing to use prior changes in stop and search and discrimination complaints as 'learning stimuli' independent variables, but for a range of other 'learning outcomes' measured by t-2 to t changes in different complaint types. In Table 3.7, these are complaint types assumed to concern members of the public more generally, rather than reflecting explicit group-based disparities in treatment or outcomes. They are general policing standards, operational policing policies, and operational management decisions. In Table 3.8, the complaint types are those which may also concern or involve group-based disparities in treatment or outcomes, namely incivility and intolerance, sexual conduct, and fairness and impartiality. The regressions in Table 7 thus test the hypothesis in terms of the trade-off with more 'universal' learning themes, and in Table 8 the trade-off with other group-based learning themes. In each case, H2 is tested by interacting the prior (t-3 to t-2) change in complaints on the same theme as the dependent variable (the change t-2 to t) with either the prior change in stop and search or discrimination complaints.

A learning trade-off effect is suggested in column 1 in Table 3.7 – there is a significant ($p < 5\%$) and positive interaction between the prior changes in general policing standards and discrimination complaints for the current trend in complaints about general policing standards. The same is not found in interaction with stop and search complaints (column 2). Meanwhile, a similar 'trade-off' effect is noted for complaints about operational policing policies in interaction with prior changes in stop and search complaints (column *Operational policing policies (b)*) but not discrimination complaints (*Operational policing policies (a)*). Finally, there appears to be a 'complementary' effect

for learning from complaints about operational management decisions when prior discrimination complaints grow (final column of Table 7).

Figure 3.2. Predictive margins – interactive effect of black workforce share and past growth in stop and search complaints on current trend in stop and search complaints²¹



In Table 3.8, across a range of specifications the 'learning stimulus' represented by increased prior complaints about either stop and search or discriminatory behavior appears to be *complementary* to learning from other complaint types which concern more explicitly group-based impacts of policing compared to Table 3.7. For example, in the penultimate column of Table 3.8, there is a negative and significant ($p < 0.05$)

²¹ Plot corresponds to the results in Column 1 of Table 5

association between the current trend in a police force's sexual conduct complaints from members of the public and the interaction between past growth in this complaint type *and* in stop and search complaints.

3.5 Discussion and conclusion

This essay offers a novel, mixed methods study of learning accountability. It builds on previous contributions to explore and explain organizational *conditions* for learning from civic challenges. In particular, it explores workforce social diversity as an often implied but little-studied organizational condition which may affect whether and how public agencies learn from complaints arising from citizen-state interactions.

Thematic analysis of over 40 interviews with English and Welsh policing insiders identified *lesson salience and integrity* as a more novel learning condition among others which are also found in the learning literature. It reflects the perception among many participants that new organizational knowledge arising from the interpretation of civic challenges will transform organizational behavior more effectively when perceived by street level bureaucrats as relevant and trustworthy, and when it is more contextualized.

That the 'salience and integrity' learning condition appears more novel with respect to the literature could reflect idiosyncrasies of policing, with its high public scrutiny and frequent recourse to coerced learning, whether from within the organizational hierarchy or from national legislation and guidance. This speaks to policing research suggesting that a lack of involvement in prescribed changes may "inhibit engagement with the reform process" (Porter, 2015 p230).

I suggest that this condition reveals something more fundamental about organizational learning *through public accountability*, rather than learning in general, because it reflects the separation which accountability mechanisms place between action (e.g. operational policing) and cognition, or the organization's interpretation of civic challenges, even within public organizations. This argument will be familiar to judicial or ombudsman impact scholars (Gill, 2018), as oversight bodies' lack of contextual knowledge is a prominent argument for limiting their intervention in administrative decision-making. It may be less familiar in extant organizational learning perspectives. It suggests that this separation needs to be bridged somehow if new knowledge gained is to ultimately change the scope of future organizational actions. This speaks to Crossan et al.'s (1999) call to better understand the relationship between interpretation and institutionalization in their influential '4 I's' model of organizational learning.

Overall, practical insights from this theme suggest that developing trust and understanding between actors on each side of the action/cognition divide may help, as could greater participation or collaboration by those on the 'action' side (in this case, frontline officers) in interpretive, integrating and institutionalizing activities. This clearly needs to reconcile with impartial investigation of individual cases (the "who investigates?" question in police complaints literature, Torrible, 2016), suggesting that interpretation and other learning-related functions may be more effective overall if separated from those functions which must make determinations regarding individual blame. This recalls Graham Smith's (2004) argument for a separately handled process for 'unacceptable policy' complaints. Future research could seek to compare the identification and integration of lessons derived from civic challenges under different

'cognitive configurations' within public organizations, for instance how integrated or separated 'learning' roles or functions are from those tasked with interpreting for the purposes of determining sanctions against individuals.

The analysis of the relationship between workforce social diversity and learning from civic challenges defines some important contours between these two complex constructs. Seen through the lens of organizational cultural candor, the hierarchical 'know your place' culture which still largely typifies policing organizations—or parts of them— was often portrayed by insiders as driving conformity in such a way that differences in perspective held by organizational members with non-mainstream social backgrounds are especially less likely to be expressed. Meanwhile, the rise of diversity as a meta-concept is perceived by informants as increasing attention, resources and organization (formal and informal) within police forces around social or identity group-based issues, themes and forums, though the substantive impacts of such developments were questioned by several participants.

The hypotheses derived from the qualitative analysis focus on the apparent competitive internal – or bureaucratic-political— dynamics of learning from civic challenges. These contribute to political perspectives on organizational learning (for example Bristow, Tomkins and Hartley, 2021). A range of random and fixed effects models were estimated using original data on 43 English and Welsh territorial police forces between 2011 and 2018 to test whether different facets of workforce diversity (including passive representation, fractionalization among different groups and concentration of groups in different functional areas) affect organizational learning from different types of public complaint. The qualitative exploration and quantitative results both support the notion of

a bureaucratic-political side of learning within public agencies which is less visible when taking a purely managerial perspective on learning accountability as performance improvement.

The research design does not enable causal claims. The challenge of robustly identifying impacts of external influences like complaints or judicial review within the “administrative soup” of agency decision making (Sunkin, 2004 p71) has long been recognized. However, the quantitative analysis exploited the structure of the panel data, temporal differences between independent and dependent variables and a range of controls in an effort to limit endogeneity concerns. Combined with deriving hypotheses and operationalizing key concepts, the approach taken is considered to be reasonably robust as one of the only systematic attempts at testing learning conditions from civic challenges.

A second limitation is that the data reflect only police perspectives on learning from civic challenges. The focus on internal police views was intended to advance a more distinctly public administration perspective alongside existing studies of ‘administrative impact’ which adopt the vantage point of external actors. The wide range of conflicting perspectives within policing itself on civic challenges, learning and workforce social diversity reflect the normative pluralism within police culture (widely acknowledged in the literature; Sklansky, 2007b; Reiner, 2010) and further justifies prioritizing police voices in this study. Engaging with the views of complainants, the general public or civil society actors would be a worthwhile avenue for future research.

Table 6. Fixed effects - correlates of 'learning' from discriminatory behavior complaints

	1a	1b	1c	2a	2b	2c
Change in discrimination complaints (t-3 to t-2)	-0.168 (0.121)	4.486* (1.765)	4.476* (1.832)			
Change in discrimination complaints per officer (t-3 to t-2)				-0.308* (0.100)	-0.233+ (0.120)	-3.514* (1.506)
Change in discrimination complaints (t-3 to t-2) # Black % of workforce (t-1)	-27.08+ (14.41)					
Change in discrimination complaints (t-3 to t-2) # Women - % of workforce (t-1)		-7.892* (2.882)				
Change in discrimination complaints (t-3 to t-2) # Concentration between functions (t-1)			-4.314* (1.638)			
Change in discrimination complaints per officer (t-3 to t-2) # Black % of workforce (t-1)				-29.60* (13.27)		
Change in discrimination complaints per officer (t-3 to t-2) # BAME % of workforce					-7.719* (3.226)	
Change in discrimination complaints per officer (t-3 to t-2) # Fractionalization (t-1)						6.259* (3.080)
Black % of workforce (t-1)	-136.0 (1938.1)	432.1 (1904.1)	168.1 (1906.6)	1.047 (0.827)		
Black, Asian and Minority Ethnic % of workforce (t-1)					-0.0294 (0.252)	-0.00572 (0.252)
Women % of workforce (t-1)	-113.7 (101.0)	-83.88 (100.2)	-97.04 (100.1)	-0.0450 (0.0425)	-0.0420 (0.0430)	-0.0403 (0.0432)

Fractionalization (t-1)	231.5 (271.5)	268.3 (268.7)	166.4 (268.6)	0.0554 (0.116)	0.0593 (0.131)	0.0852 (0.133)
Concentration between functions (t-1)	-17.00 (75.11)	-0.865 (74.15)	-2.384 (74.26)	-0.00439 (0.0303)	0.00672 (0.0300)	0.0082 (0.0301)
Workforce size (t-1)	-0.00549 (0.00700)	-0.00462 (0.00691)	-0.00446 (0.00692)	-0.00000262 (0.00000204)	- 0.00000225 (0.0000021 1)	- 0.0000015 7 (0.0000021)
Body cams per officer (t-1)	5.283 (5.334)	6.474 (5.277)	4.885 (5.281)	0.000713 (0.00231)	0.000515 (0.00232)	0.000787 (0.00232)
Deprivation in population served	-551.1* (210.0)	-503.9* (208.2)	-546.8* (207.7)	-0.139 (0.0910)	-0.142 (0.0920)	-0.149 (0.0924)
Population share – Black	-6759.8 (5401.4)	-7312.2 (5327.9)	-7787.3 (5341.7)	-0.500 (2.143)	-0.720 (2.101)	-0.236 (2.277)
Log size of population served	90.64 (220.9)	120.3 (218.0)	79.37 (218.6)	0.0593 (0.0952)	0.0344 (0.0963)	0.0270 (0.0994)
PCC election year=1	-8.320 (6.396)	-7.547 (6.327)	-7.265 (6.348)	-0.00518* (0.00261)	-0.00443+ (0.00260)	-0.00430 (0.00240)
Observations	208	208	208	213	213	213

Standard errors in parentheses

Dependent variable is gross change in discrimination complaints (from the public) from t-2 to t, excluding observations from the Metropolitan Police, in Models 1a, b and c. It is change in discrimination complaints per officer (inclusive of Met observations) in Models 2a, b and c.

All models include year controls.

+ $p < 0.10$, * $p < 0.05$

Table 7. Complementary and 'trade-off' learning I

	General policing standards (a)	General policing standards (b)	Operational policing policies (a)	Operational policing policies (b)	Operational management decisions
Growth - general policing stds complaints (t-3 - t-2)	-0.504* (0.106)	-0.328* (0.106)			
Growth - operational policy complaints (t-3 - t-2)			-0.326* (0.0915)	-0.355* (0.0890)	
Growth - operational mgmt decision complaints (t-3 - t-2)					-0.290* (0.0898)
Growth - corruption & malpractice complaints (t-3 - t-2)					
Change in discrimination complaints (t-3 to t-2)	-0.138 (0.112)	-0.176 (0.119)	-0.00381 (0.0889)	-0.0275 (0.0865)	-0.0860 (0.0716)
Growth in stop & search complaints (gross) (t-3 to t-2)	0.248 (0.287)	0.266 (0.313)	0.0653 (0.241)	0.135 (0.240)	-0.0512 (0.194)
Growth - general policing stds complaints (t-3 - t-2) # Change in discrimination complaints (t-3 to t-2)	0.0280* (0.00783)				
Growth - general policing stds complaints (t-3 - t-2) # Growth in stop & search complaints (gross) (t-3 to t-2)		0.0238 (0.0206)			
Growth - operational policy complaints (t-3 - t-2) # Change in discrimination complaints (t-3 to t-2)			0.0106 (0.00959)		

Growth - operational policy complaints (t-3 - t-2) # Growth in stop & search complaints (gross) (t-3 to t-2)				0.0378*	(0.0178)
Growth – operational mgmt decision complaints (t-3 - t-2) # Change in discrimination complaints (t-3 to t-2)					-0.0553* (0.0179)
Body cams per officer (t-1)	-5.614 (5.958)	-7.143 (6.495)	3.412 (3.507)	3.217 (3.452)	-0.994 (2.790)
Workforce size (t-1)	-0.00582 (0.0103)	-0.0112 (0.0110)	-0.00134 (0.00125)	-0.00134 (0.00123)	0.000424 (0.000995)
Log size of population served	303.3 (474.6)	263.8 (514.6)	2.546 (5.253)	3.083 (5.178)	-2.981 (4.169)
BAME % of workforce			22.91 (61.87)	29.90 (60.76)	60.60 (49.11)
Women - % of workforce (t-1)			-52.75 (32.32)	-50.12 (31.75)	2.246 (26.05)
Concentration between functions (t-1)					18.88 (62.97)
Fractionalization (t-1)					245.2 (255.4)
Observations	123	123	123	123	123

Standard errors in parentheses. Dependent variable is change from t-2 to t-1 in gross complaints about respective column titles. All specifications include control for year and exclude London's Metropolitan Police

+ $p < 0.10$, * $p < 0.05$

Table 8. Random effects - complementary and 'trade-off' learning II

	Incivility, intolerance (a)	Incivility, intolerance (b)	Sexual conduct (a)	Sexual conduct (b)	Fairness & impartiality
Growth in stop & search complaints (gross) (t-3 to t-2)	-1.421 (0.911)	52.47* (25.31)	0.00286 (0.0543)	0.00413 (0.0537)	-0.0111 (0.635)
Change in discrimination complaints (t-3 to t-2)	-0.428 (0.366)	-0.143 (0.382)	-0.00484 (0.0215)	-0.0113 (0.0211)	-0.479* (0.244)
Growth - incivility, intolerance complaints (t-3 - t-2)	0.149 (0.0946)	0.107 (0.0989)			
Growth - sexual conduct complaints (t-3 - t-2)			-0.504* (0.0601)	-0.628* (0.0682)	
Growth - fairness & impartiality complaints (t-3 - t-2)					-0.140 (0.0998)
Growth - incivility, intolerance complaints (t-3 - t-2) # Growth in stop & search complaints (gross) (t-3 to t-2)	-0.0839* (0.0163)				
Growth in stop & search complaints (gross) (t-3 to t-2) # Concentration between functions (t-1)		-48.63* (22.90)			
Growth - sexual conduct complaints (t-3 - t-2) # Change in discrimination			-0.0192* (0.00594)		

complaints (t-3 to t-2)					
Growth - sexual conduct complaints (t-3 - t-2) #				-0.0670*	
Growth in stop & search complaints (gross) (t-3 to t-2)				(0.0169)	
Growth - fairness & impartiality complaints (t-3 - t-2) #					-0.0300+
Growth in stop & search complaints (gross) (t-3 to t-2)					(0.0177)
BAME % of workforce	-46.72 (506.3)	-69.61 (532.1)			-16.42 (163.8)
Women - % of workforce (t-1)	-181.9 (161.5)	-180.9 (169.9)			-17.60 (84.48)
Concentration between functions (t-1)	-77.58 (127.2)	-91.59 (133.7)			
Fractionalization (t-1)	351.8 (375.8)	335.7 (394.9)			
Body cams per officer (t-1)	33.97+ (18.20)	33.19+ (19.17)	0.992 (1.032)	1.014 (1.020)	2.416 (12.09)
Workforce size (t-1)	-0.00168 (0.00505)	-0.00148 (0.00531)	0.000123 (0.000108)	0.000118 (0.000107)	-0.00363 (0.00319)
Log size of population served	0.569 (22.77)	-1.738 (23.94)			19.87 (14.27)
Observations	223	223	223	223	223

Standard errors in parentheses. Dependent variables are the change from t-2 to t-1 in gross complaints about each column's title. All specifications include control for year and exclude London's Metropolitan Police

+ $p < 0.10$, * $p < 0.05$

4. What seems to be the problem? Exploring cross-sector arrangements for social accountability

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4.1 Introduction

A rich literature has developed into cross-sector interactions in recent decades, reflecting the rising prominence of cross-sector collaborative governance as an engagement mode between state and non-state actors (Ansell and Gash 2008) in the face of wicked problems, for which unilateral or single-sector solutions are found wanting (Bryson and Crosby 2014). In stylized terms, complex public problems emerge in society, and governments are entrusted with the mandate to tackle them, either alone or, more frequently, as orchestrators working with other players who are typically coopted based on their expertise, familiarity or stake in the issue.

Understanding these problems is not an easy task. Some problems may be considered less visible than others, and public institutions fail to see them coming, as in ‘blind spots’ theorized in current studies on organizational pathologies of public bureaucracies (Bach and Wegrich 2019; Lodge 2019). Furthermore, traditional representative channels preclude many issues, especially those of marginalized groups, from being subject to public conversation (Cummings and Rhode 2009), let alone being reflected in policy decisions (Lafont 2019). This issue is made particularly pressing by the increasing

“social equity footprint” (Nisar 2018, 104) of public policy, with many of these problems connected to the identity of the people to be served by government (Pandey et al. 2023) and remaining hidden due to the impact communities’ limited capacity for influence.

Albeit not perfect, collaborative cross-sector governance (Ansell and Gash 2008), co-creation (Ansell and Torfing 2021), and varieties thereof like co-delivery (Loeffler, 2021) and co-assessment (Nabatchi, Sancino and Sicilia 2017) offer plausible alternative platforms to identify and discuss problems in society. However, some problems arise exactly from, or are entrenched in, government action. In other words, there are issues that public organizations (and the policies and practices which they set or administer) are somehow causing, inadvertently or otherwise, and for which someone in their midst may be responsible for addressing. The shift in focus from societal to government problems we pursue in our study, with the accompanying concern of how to make them visible and address them, qualifies this a matter of public accountability, i.e., accountability of institutions “toward criticism, questions, and commentary voiced in public by citizens or organized civil society” (Willems and Van Dooren 2012, 1019) or represented by nonprofit organizations (Amsler 2016; Cheng 2019; Loeffler 2021; McMullin 2020; Strokosh and Osborne 2020).

Whether or not mediated by community organizations, accountability dynamics between impact communities and public actors vary remarkably, from full-fledged judicial procedures to campaigns aimed at raising collective awareness. Along this continuum, arrangements for cross-sector interaction are increasingly vested with the ambitious mandate of enabling co-creation and co-assessment (Ansell and Torfing 2021; Sicilia et al. 2016), turning confrontation into a productive conflict (Ansell and Gash 2008; Ansell

2011). Our initial research question is thus: How do cross-sector arrangements enable to incorporate the perspective of impact communities to improve public accountability and service?

To explore our question, we conducted an inductive case study in the empirical context of a novel governance arrangement in England and Wales for civil society organizations to raise evidenced 'super-complaints' about problems in policing that they allege cause public harm, as an instance of cross-sector collaboration geared towards social accountability. Designated civil society organizations working on a wide range of issues which intersect with policing (including violence against women and girls, racial equality and civil liberties), at different levels (from grassroots service provision to policy forums and strategic litigation), are given the initiative to set out, and demand a state investigation of, problems on behalf of impact communities and the civil society sectors which serve them. Examples of issues raised to date include an allegedly widespread police practice of sharing data about domestic abuse victims with insecure immigration status with the immigration authorities, a challenge to how police use suspicionless stop and search powers, and how the police respond to cases of stalking. Super-complaints are mutually assessed and investigated by independent oversight and standard-setting bodies belonging to the public sector in interaction with the super-complainants, concluding with a formal, public report which – besides evaluating the complaint – issues recommendations for different authoritative actors in the policing governance ecosystem to address the problems that have been articulated and substantiated through the investigation.

The police super-complaints system allows civil society organizations to tell government what matters to their beneficiaries and represents our case. Our preliminary findings illustrate the role of civil society organizations in filtering the voice of impact communities and brokering their lived experience through this arrangement, facilitating productive accountability relations between rights holders and government agencies (Schmitz and Mitchell 2016). The results point to evidence as a relational mechanism between stakeholders, and to the importance of encouraging and guarding the main currency of evidence, i.e., the lived experience of impact communities and street level bureaucrats by shaping the arrangement as a safe space. Results also indicate both a symbolic and a substantive role of confrontation allowed by the arrangement. Last, they shed light on the sense-making efforts of the orchestrators, which remain attentive to the voice and view of marginalized groups without disregarding those of the public sector, in order to prevent frame-based resistance, hence the relevance of the arrangement as a mechanism for social accountability. Next, we introduce the theoretical underpinnings of the study.

4.2 Theoretical tenets

Cross-sector arrangements to identify and address social problems

Over the last decades, society has increasingly resorted to a variety of boundary-spanning efforts aimed at addressing complex and interdependent problems. The so-called collaboration imperative started with intensifying intergovernmental coordination as a way out of silo thinking and compartmentalized modus operandi typical of traditional public agencies (Kettl 2006). Over time, it has evolved to include cross-sector

initiatives (Ansell and Gash 2008; Bryson, Crosby and Stone 2006), which have become the standard approach to governing in many policy domains by mobilizing stakeholders to establish infrastructures or deliver services that compensate for individual sector failures (Bryson and Crosby 2014; Gray and Wood 1991; Gray 1997; Huxham and Vangen 2005), wicked problems (Head and Alford, 2015) or grand challenges like poverty (Lee, McGuire and Kim, 2018), crime (Florence et al., 2011; Choi and Choi, 2012), and climate change (Kalesnikaite, 2019), and include a wide range of service areas from healthcare (Mountford and Geiger, 2018) to housing (Gash, 2022).

In the wake of precious stock-taking exercises (Ansell and Gash 2008; Bryson et al. 2006; Emerson et al. 2012; Thomson and Perry 2006), scholars have dissected and classified collaborative arrangements along several dimensions, including contextual conditions, levels, policy areas, the types of actors involved, and the phases of the joint work. The necessary definitional rigor and boundaries of these attempts have postulated that co-production, rooted in civic engagement and public participation (Fung 2006), ought to include directly lay people in one or more stages of public service delivery, while collaborative governance and cross-sector networks have relational dynamics leading to joint decision making among organizations as their unit of analysis.

Our study is based on the premise that cross-fertilization and theoretical advances within and between these paradigms have hybridized some of their tenets and the resulting labels, which are constantly blended and adapted to ensure 'fitness for purpose', i.e. ability of the paradigm to detect and unpack early phenomena and guide policy developments (Loeffler 2021). On the one hand, coproduction is conceived as a

pluralistic model of public intervention (Sorrentino et al. 2018; Bovaird et al. 2023), based on the input of lay people (Fung 2015), also when organized in collectives (Park 2020) or represented by nonprofit organizations (Amsler 2016; Cheng 2019; Loeffler 2021; McMullin 2020; Strokosh and Osborne 2020) in the commission, design, delivery, and assessment (Bovaird and Loeffler 2013) of public action (Nabatchi et al. 2017). On the other hand, for a cross-sector arrangement to fall under the rubric of collaborative governance, it is not strictly necessary that a decision is jointly made, as much as consensus is sought (Ansell and Gash 2008) by structuring conflict in ways that may be fruitful rather than merely antagonistic (Ansell 2011).

A more or less explicit assumption running through theories on collaborative governance is that these arrangements are activated by recognizing that a societal problem exists and cannot be solved by one actor alone. This step typically marks the beginning of the initiative, although it is recursively performed as challenges mutate and resurface. For example, a general agreement on the problem is included among the preconditions of cross-sector collaboration (Bryson et al. 2006), and helps to identify stakeholders already actively involved in the issue, who gather around collaborative platforms (Ansell and Gash 2018; Ansell and Torfing 2021), or the linchpin organizations that support multi-stakeholder governance. Once problems have been identified, continuous efforts are needed to build and maintain shared meaning by describing, clarifying, and discussing those problems (Bentrup 2001; Nabatchi et al. 2012). However, the whole process can be fraught with obstacles.

Challenges to problem definition in cross-sector arrangements

Existing literature on 'blind spots' in government agencies (Bach and Wegrich 2019, Christensen 2019, Lodge 2019) has revealed that some problems fail to capture policymakers' and public managers' attention, either because they are linked to unintended consequences of institutional features, or because of unawareness (Lodge 2019). Although cross-sector arrangements can contribute to addressing these shortcomings, they do not automatically offer opportunities for both critical thinking and constructive exchanges (Cunliffe and Jun 2005). To avoid tunnel vision, debate and some degree of unsettling dynamics are considered necessary, even in cross-sector arrangements. Along this line, scholars point to the importance of encouraging the participation of members with meaning systems that orient distinct and often conflicting assumptions, values, and practices (Easter et al. 2023). However, participants in multi-stakeholder initiatives make sense of a situation, i.e., frame a problem, its potential solutions, and their own identity with respect to it, in ways that are doomed to proceed in parallel. Such intractable contention may derail joint initiatives (Gray 2004; Gray & Purdy 2018; Ulibarri 2023) and exacerbate the wickedness of the situation (Gray 1989; Termeer et al 2015). However, we don't really know how these dynamics play out when public policies or practices lie at the heart of the problem.

Furthermore, to foster genuine problem recognition, cross-sector initiatives should be designed to maximize forms of participation that do not reinforce political inequalities (Peters 2010) or accountability deficits (Papadopoulos 2007; Lee and Ospina 2022). In this vein, a strand of research has advanced our critical understanding of governance and questioned its normative underpinnings (Fox 2015; Triantafilou 2019, Park 2020;

Levin 2022). These studies problematize the assumption that the priorities and concerns of the relevant communities (Nabatchi 2012) will automatically percolate into the decision-making process of hybrid arrangements. Yet, such arrangements are not always easily accessible (Clark 2018), especially for individuals at the intersections of social vulnerability (Levin 2022). Recruiting and retaining these participants, as well as enabling and nurturing their meaningful intervention (Lasker and Weiss 2003) are difficult tasks, and so is the process of interpreting and acting upon a type of feedback that is often “unstructured, noisy, off-topic or inconsistent” (Buntaine et al. 2021, 109). Consequently, cross-sector arrangements run the risk of being unrepresentative (Parrado et al. 2013) and to ignore or select out messy inputs. ‘Epistemic injustice’ (Levin 2022) arises exactly when arrangements don’t enable alternative discourses on the problem at hand to emerge and influence member interactions, thus perpetuating the societal lack of skills, interest, or willingness to hear and understand the experiences of specific communities. Grounded in critical theory and political philosophy, this view submits that governance arrangements should also respond to citizens’ contestations transparently, indicating an explicit commitment to address social justice (Young 2002). We expect to find these dynamics at play in several *species* of the *genus* of cross-sector governance arrangements (Ansell and Gash 2008), and especially those geared towards social accountability.

Cross-sector arrangements for social accountability

Scholars have theorized cross-sector arrangements as governance processes where voice and collaboration are integrated along the policy continuum. Different, but not

necessarily alternative to the corresponding hierarchical, formal institutions, cross-sector initiatives mirror the upstream legislative, midstream executive, and downstream enforcement stages with the quasi-legislative, implementation, and quasi-judicial ones (Amsler 2016). While sustained scholarly attention has been particularly attentive to collaboration during the implementation phase, we submit that cross-sector arrangements in the quasi-legislative and, especially, quasi-judicial ends of the policy continuum, lend themselves to exploring dynamics of social accountability. They define behavioral standards for their members, foster oversight of public and/or private sector performance, channel public complaint and redress mechanisms, and offer alternative dispute resolution such as mediation, facilitation, early neutral assessment, and arbitration (Fox 2015). On the quasi-judicial side, complaint and redress are typically accompanied by fact-finding, with impartial third parties conducting evidentiary hearings and investigations to clarify disputed events. In turn, fact-finding enables a retrospective determination of rights and responsibilities among a defined set of actors (Bingham 2009). The arrangements remain, however, quasi-judicial, i.e., based on some forms of voluntary endorsement rather than on the authority to impose a solution. Instead, the parties agree on the outcome or agree to disagree (O’Leary and Raines 2001).

The last two decades have witnessed a proliferation of quasi-legislative and quasi-judicial arrangements (Bingham, Nabatchi, and O’Leary 2005). A fair share of their spread may be connected to the prominence of cultural models promoting partnership over conflict among sectors, or a ‘proclivity towards nonconfrontational behavior’ (Poncelet 2001, 13). These arrangements can also be the only game in town (Baccaro and Mele 2012) when formal accountability procedures are unavailable or display

significant limitations. By way of illustration, lacking the political consensus to expand formally in new or controversial policy areas, institutional entrepreneurs settle for second best by experimenting with flexible arrangements that set soft standards, monitoring mechanisms, and forms of sanctions often included in the rubric of reputational threats. In other words, initiatives such as multi-stakeholder fora, codes of conduct, and collaborative forms of voluntary regulation mimic legal constraints and enforcement (Mele and Schepers 2013). Moving to a different example, formal redress procedures may involve learning-oriented ex post reviews of public decisions and transactions with particular users to improve service and accountability relationships. This course of action can be inspired by intentions to build an experience-based co-design (Simmons and Brennan 2017). Barriers to accessing legal redress channels are often significant (Sandefur, 2019; Dunleavy et al., 2010), so less formal procedures like complaints are the only feasible option. In synthesis, complaints, and related mechanisms consist of official venues where individuals or organizations receiving what they perceive to be an unsatisfactory service, unfair treatment, or disproportional reaction from a public body can present their “understanding of their entitlements, receive an attentive hearing, and be given an explanation or compensation” (Gauri 2013, 109).

In the context of accountability arrangements, a series of third sector organizations have carved out a new role for themselves. In voluntary corporate multi-stakeholder standards, for example, nonprofit organizations monitor companies, especially the ones endorsing a code, and employ tactics to hold them accountable towards impact communities. It can be argued that over time, third sector organizations pursuing a

rights-based approach to social advancements, withdrew from direct service provision to citizens on behalf of governments, facilitating instead ‘productive accountability relationships’ (Schmitz and Mitchell 2016, 252) between impact communities, i.e., rights holders, and government agencies.

Drawing these theoretical tenets together, cross-sector collaboration is charged with the task of defining and addressing complex issues. However, the process is often complicated by deadlocks in problem discovery and scarce representativeness of the voices included. Based on existing studies, we can infer that blind spots about social issues are amplified when civil servant views of the public are “entrenched in stereotypical attitudes towards marginalized populations” (Levin 2022, 94). However, studies on cross-sector collaboration have been predominantly concerned with issues ‘out there’ in society rather than ‘in house.’ We thus posit that a better understanding of how problems inherent in government practices and policies can be identified through cross-sector forums and mechanisms has essential implications for public accountability and service improvement and is underexamined in extant theory and research. We account for where and how we conducted our study in what follows.

4.3 Research strategy

Empirical and policy context

The U.K.’s police service operates according to the principle of ‘policing by consent,’ with legitimacy widely considered a central aim (Rowe 2020). This has become challenging as policing has significantly changed in recent decades, reflecting wider

social changes (Loftus 2008). Such changes include frequent reforms, the changing nature of crime, and significant increases in the representation of women and ethnic minorities in police forces (Hong 2017). Rowe (2020, 133) suggests that what appears to be an erosion of a past golden age of consensus regarding what constitutes good policing may instead reflect a greater articulation of rights claims by marginalized communities, echoing theories according to which broad social changes as far back as the post-war period have gradually transformed the police from a 'sacred' to a 'profane' social institution in Britain (Reiner 1995).

The governance arrangement forming our empirical case was brought in as part of wider policing reforms (Police and Crime Act 2017) has been operational since 2018. It allows designated charities and advocacy organizations to raise evidenced super-complaints on behalf of the public and other grassroots socially-oriented organizations about systematic issues in policing which they argue cause public harm. Three independent public bodies with national policing oversight and standard-setting functions are jointly responsible for assessing super-complaints and investigating them if they are judged to meet broad criteria as set out in legislation. The process involves cross- and within-sector interactions between public and civil society organizations. In this way, it represents a particular instance of collaborative governance in the UK context.

Following the investigation, during which the independent bodies are required to regularly update super-complainant organizations on their progress, the super-complaint process formally concludes with a public report on the investigation's results. The report also includes any recommendations for different actors within the policing

ecosystem, including the 43 police forces which deliver frontline policing on a territorial, operationally-independent basis; the National Police Chiefs' Council (NPCC), which is made up of all forces' chief and other senior officers, and plays an important role in setting operational policy and guidance at a national level; and elected Police and Crime Commissioners (PCCs) who provide local scrutiny and policy priorities for each police force. Recommendations may also be made for the Home Office (responsible for policing policy), the independent bodies themselves, as well as other governing bodies and associations.

Within institutions for civilian oversight of the police, super-complaints build on a more traditional system of complaints brought by individuals regarding specific incidents and officers. Since the 1970s, reforms to police complaints showed a trend towards more external investigation, though the "vast majority" of claims continue to be investigated by police forces' internal Professional Standards Departments (Rowe 2020, 49-50).

Different scholars have described the plural and competing functions of the complaints system, for example as entailing complainant satisfaction, discipline in the ranks, managerial feedback and maintaining public confidence (Maguire and Corbett, 1991, 13; see also Smith 2004). Torrible (2016) summarizes debates on police complaints in terms of two analytical approaches: practical workings and the needs or wishes of complainants, and second, the need for external involvement in complaint handling. There has been little research into a 'problem-identification' perspective on police complaints in this context, and Rowe (2020, 6) notes more generally that there has been little evidence on the effects of 'hard' accountability mechanisms on police management, performance, or delivery. As for the 'systemic' focus of the mechanism,

police super-complaints were preceded by three super-complaint arrangements introduced in the early 2000s for consumer groups to challenge the market practices of private sector organizations. In the UK, police super-complaints are the first arrangement to address systemic issues in the public sector. This is why we selected this empirical context after a comprehensive analysis of the options.

Specifically, we consider this innovative arrangement to be of interest to public administration and policy scholars more generally, as it falls squarely within the variety of hybrid governance arrangements that aim to address public problems by combining collaboration and confrontation. Unlike formal litigation, civil society organizations are invited and encouraged to contribute to improving the conception and practice of a fundamental government function. To some extent, they are even equipped to do so through capacity-building activities, such as knowledge-sharing on information sources and existing research. The channel is non-judicial and gives the initiative to civil society organizations to direct public resources to investigate an issue they have identified and framed in the first instance (noting that this right is exclusive to designated organizations and applies to submissions meeting certain characteristics set out in law). On the other hand, the process has parallels with more traditional, adversarial mechanisms such as formal complaints. Neutral, independent bodies are expected to lead the process impartially. They must engage with super-complainants and their complaints, making it a mechanism for promoting public accountability, while abstracting away from identifiable incidents or individuals.

The introduction of police super-complaints: background

In common with many systems and mechanisms for administrative justice, the police complaints regime in the context of this study has traditionally had a markedly individual focus – on specific incidents, on the conduct of individual police officers, and with challenges levied against individual police forces or agencies as opposed to being able to challenge and obtain remedies or policy change at a national level. U.K.

parliamentary transcripts between 2015-2018 indicate two primary, ostensible reasons why the super-complaint mechanism was introduced in policing. One was an ongoing concern that existing mechanisms for police accountability – individual complaints, litigation and judicial review – were unable to adequately detect and resolve systemic problems in policing, even in cases of concerted advocacy by civil society, victims and survivors, with negative implications for the public good and for police legitimacy.

First, parliamentary discussion (Berry, Column 45 2016) and government consultation documents (Home Office, 2017) regarding the super-complaint proposals included references to the scandal of decades-long child sexual exploitation in Rotherham that was known to local authorities and police but not acted upon until the matter became a national scandal in the early 2010s. The second concern apparently motivating the system's introduction was about unequal use of individual complaints and other mechanisms across society – with vulnerable and marginalized groups and individuals being less likely to challenge poor or incorrect practice. Connected to this concern was a view that charities and advocacy groups could play a role in acting on behalf of such groups and individuals (Home Office, 2015).

Key actors in super-complaints: designated civil society organizations, grassroots organizations, and independent police bodies

Directly involved in police super-complaints are designated bodies on the civil society side and independent police bodies on the public side. As at mid-2022 (and since 2018), there are fifteen civil society organizations and one independent public body (the Children’s Commissioner for England) which are legally designated as entitled to bring super-complaints. To become designated bodies, these organizations had to apply during a window of time in the system’s introduction. Some organizations applied unprompted while others were invited or recommended to apply by the government. Applications were judged against various legislative criteria. These include, among other things, competency and experience in representing the interests of the public, governance and accountability arrangements, and a commitment to “collaborating effectively” with other civil society organizations which are not designated but may be aware of matters that could form the basis of a complaint, potentially bringing super-complaints on their behalf. This last criterion indicates that civil society involvement in super-complaint processes is not intended to be limited to the formally designated organizations, and indeed our documentary and interview evidence show that wider networks of charities and NGOs are activated in practice; particularly in noticing and gathering evidence on systemic issues from the frontline of grassroots support services. We refer to civil society organizations that are not designated but are involved in super-complaints as grassroots organizations. So far, seven super-complaint processes have been initiated by seven designated bodies (Table 4.1)

Table 4.1. All police super-complaints initiated between 2018 and 2022

Super-complaint title	Designated civil society organization(s)	Start and end dates (super-complaint submission and final report publication)
<i>Police data sharing for immigration purposes</i>	Liberty and Southall Black Sisters	December 2018 – December 2020
<i>Police use of protective measures in cases of violence against women and girls</i>	Centre for Women’s Justice	March 2019 – August 2021
<i>Police response to victims of modern slavery</i>	Hestia	April 2019 – May 2021
<i>Force response to police perpetrated domestic abuse</i>	Centre for Women’s Justice	March 2020 – June 2022
<i>Police response to victims of sexual abuse from ethnic minority backgrounds who may be at risk of honour-based abuse</i>	Tees Valley Inclusion Project	March 2021 – December 2022
<i>Police use of stop and search powers</i>	Criminal Justice Alliance	May 2021 - Ongoing
<i>Police response to stalking</i>	Suzy Lamplugh Trust	November 2022 – Ongoing

Three independent police bodies are jointly responsible for assessing and investigating super-complaints. The first is Her Majesty’s Inspectorate of Constabulary, Fire and Rescue Services (HMICFRS or the Inspectorate). The Inspectorate’s wider function is to assess independently the effectiveness and efficiency of police forces in the public interest, through in-depth periodic and thematic inspections. The second is the Independent Office for Police Conduct (IOPC), which is akin to an ombudsman, in that it oversees the system for individual complaints against police officers and forces, investigating the most serious matters, including deaths following police contact. Since

the policing reforms of the late 2010s, they are also responsible for learning from their work on complaints and serious incidents to influence changes in policing at a national level. The final independent police body involved in super-complaints is the College of Policing, an operationally independent, arm's-length body of the Home Office. It is a professional body for policing which sets standards and guidance and conducts research, among other activities. The Inspectorate is the lead agency for super-complaints, but all three are jointly involved in assessing and investigating them and producing the final report. After introducing the main functioning mechanisms, the policy background, and the actors involved in this cross-sector arrangement, we now present our research strategy.

Design and methods

We adopt a case study design (Yin, 2014; Miles, Huberman & Saldaña, 2014), where the inception and evolution of the collaborative governance arrangement, i.e. the super complaint initiative (2018-2022) represents our case. To gain an in-depth understanding of how the initiative works, we have also traced and analyzed each of the individual super-complaints brought by civil society organizations and submitted, five of which have concluded (see Table 1). The temporal span of our analysis is bound by the conception, preparation, and submission of the first super-complaint until the end of 2023. We have also tracked earlier and later events related to each embedded case to gain a more contextualized perspective of the process, its antecedents, and (early) impacts.

Data collection and analysis

Rich qualitative data were collected between November 2022 and November 2023 mainly from archival analysis and interviews with participants associated with super-complaints in different sectors and stages (see Table 4.2). Considering the rather formal nature of a quasi-judicial arrangement, documents – especially but not limited to the super-complaints submitted by civil society organizations, investigative reports of the independent police bodies, and formal responses to the latter’s recommendations by policing ecosystem actors – represent a fundamental source of evidence for understanding the case and the interactions among the main stakeholders. To date, we have collected 157 documents for a total of about 1900 pages. Together with these formal documents and related press releases associated with the super-complaints, we also included relevant webpages of civil society organizations, a range of national media coverage (television, radio, and print press), and two observations of public meetings of practitioners and civil society organizations, respectively.

Last, we reviewed grey literature prepared by the central organizations and, where relevant, their within-sector collaborators, specifically position papers, policy briefs, and reports on the subjects raised through super-complaint, with the idea of exploring the type of evidence collected, the alternative mechanisms and channels available, as well as any ecosystem spillovers (Strokosch and Osborne 2020) during or after the super-complaint process. To complement our archival analysis, we have conducted 51 semi-structured interviews to date, for a total of approximately 600 pages of transcripts, with a range of i) super-complainants and grassroots civil society organizations that have led or contributed to super-complaints, or which are considering preparing a super-

complaint, ii) super-complaint investigatory bodies and other police national policy experts and iii) police officers with experience or insight into super-complaints or the issues they raise, from local to national levels.

Interviews for this project were particularly challenging to secure. Civil society organizations were generally eager to share their experience. However, due to their skeleton organizational structure and post-pandemic impacts on their workforce and service delivery models, they struggled to offer multiple informants and the time needed to conduct an interview. With some exceptions, public bodies involved in or accountable to the super-complaint system were often hesitant to be interviewed or to offer snowballing contacts. Sometimes, we had to follow up over several months before gaining access. To some extent, this was explained by some informants as relating to capacity constraints, though it also seemed to reflect the particular challenges of securing institutional access for sensitive topics in policing organizations (Rowe 2015, 175), a point perhaps exacerbated by the national profile and media coverage of particular super-complaint cases.

For each complaint but one, we secured interviews with staff units of the organizations with direct or indirect strategic oversight of the super-complaint preparation and handling processes. All informants were asked to review and affirm their informed consent as participants, in line with our logged institutional research ethics protocol²². While the issues treated in our empirical case often concern sensitive matters affecting vulnerable groups, all of our informants were at least one level removed from the issues

²² Reference: SA000417

as representatives of service providers, advocacy, policy, or police organizations. However, we recognized that many of our participants act in policy and institutional spaces which may be contested, high profile, and ongoing, factors which can create 'vulnerable elites' requiring sensitive management by researchers (Lancaster 2015, 97). As such, we regularly reviewed and discussed ethical considerations, including how to secure anonymity, as part of our practice of reflexivity in research design and reporting results.

For each super-complaint, we wrote thick narratives, which we then analyzed through cycles of inductive and deductive reasoning (Corbin and Strauss 1990; Miles, Huberman, and Saldaña 2014). Issues which emerged as central in our review of extant theory included conflicting perspectives as a mainstay of collaborative endeavors (especially as regards accountability-seeking, quasi-judicial forums) and the notion of collaboration as a process of structuring dialogue between such perspectives. This encouraged us to adopt an interpretive narrative analytical approach, which would allow us to reconstruct events from participants' (possibly conflicting) perspectives, with an ultimate analytical aim of 'identifying and interpreting underlying general story lines (...) that describe, explain or legitimate particular social practices, institutions or structures' (Ospina and Dodge 2005, 145).

As our data collection and analysis proceeded in parallel, as a research team we were cognizant of multiple and conflicting perspectives on what were often emotive public issues around which our participants rally and engage. At several stages, we discussed our analytical vantage point and its implications for our research design and data interpretation, striving to reconcile different values and interests that resonated for us as

researchers and which characterize our approach to achieving interpretive rigor and relevance (Dodge, Ospina and Foldy 2005). The first included an interest in shedding light on, emphasizing, and believing the standpoints of marginalized communities. Second was an interest in recognizing ambiguity and complexity so as not to pre-judge or presume simple and universal motivations, causes, or responses to public problems, by public actors in particular. Finally, this case raises many interesting public and democratic values and tensions. Not engaging with these in a quest for seeming neutrality was viewed as a wasted opportunity for such a rich empirical corpus. We consider that we were able to reasonably reconcile these three interests through our adoption of a processual analytical approach that takes the impact community's issue and its perspectives as its starting point; which explores correspondences and differences in accounts within and between sectors with an open mind, to finally engage in a more critical orientation at the end of the conceptualized process, in light of the whole process, its outputs and early outcomes, and reflections on these by participants from different sectors.

Our analysis of the archival documents and interview transcripts, conducted manually with the help of ATLAS.ti, was sensitive to issues distilled from the literature revolving around problem identification, types of evidence, examples of collaboration and confrontation, and the role of different actors in such processes. We were interested in remaining open to insights coming from the analysis of the raw data, which led to a bottom-up coding that led to the adjustment of initial themes, and to the emergence of new ones. These include *experimenting with hybrid arrangements, revealing and*

substantiating the social equity footprints of policing, and pursuing collective accountability. Next, we present our findings organized around these themes.

Table 4.2. Data sources and uses

Data sources	Type of data	Use in the analysis
<p>Archival data 157 documents, 1907 pages</p>	<ul style="list-style-type: none"> - <i>Super-complaints and appendixes (by civil society organizations)</i> 23 documents, 601 pages - <i>Investigative reports (by panel of 3 national policing bodies)</i> 6 documents, 429 pages - <i>Formal responses to report recommendations (by organizations in the policing ecosystem)</i> 65 documents, 231 pages - <i>Other documents</i> 63 documents, 646 pages 	<p>Analyzing public narratives and counter-narratives associated with the substantive issues raised through the collaborative arrangement and how they evolve, especially during and after the formal process.</p> <p>Reconstructing the public and/or formal processes of individual super-complaints and the meta-process of the overall system's introduction and evolution.</p>
<p>Semi-structured interviews (51 interviews, 619 pages)</p>	<ul style="list-style-type: none"> - <i>Civil society organizations</i> 25 interviews, 265 pages, 15 organizations including 'Designated Bodies' (approved for bringing super-complaints) and contributing grassroots charities and NGOs - <i>Public bodies</i> 26 interviews, 354 pages, 12 organizations including investigating bodies (inspectorate, ombudsman and standards-setting bodies), national policy organizations and territorial police forces 	<p>Reconstructing insider narratives of <i>problem discovery and definition</i> – (identification and framing of systemic issues, a chronology of the process, interactions and relationships among actors, evidence-gathering and sharing), channels and strategies of civil society organizations.</p>

4.4 Findings

Seeking accountability with hybrid arrangements

The super-complaint (SC) system is created as a *mechanism for accountability* that enables the internal fragmentation of the policing sector to be overcome and which provides civil society organizations submitting a SC with an official accountability channel. In the words of an informant:

“Especially in- in the UK where it's a fragmented system of policing, [The SC system] gives people the opportunity to hold police to account from a transparency point of view, because we have powers that other people do not have to get information from the police. So where the complainant, the designated body, had failed to get data from the police, we were able to succeed, because we could work with forces to do it” (Interview, IA).

The civil society organizations that have formally ‘designated’ as able to submit SCs see themselves as working with individuals and communities at *intersections of vulnerability*: “issues of homelessness, immigration problems, trauma, destitution, poverty, racism - so the interaction of violence against women, all forms of gender-related violence, and the interaction with these other issues that complicated women's experiences and needs” (Interview, CSO). The SC system mirrors this mandate: “Quite a lot of super-complaints tend to be about some element of vulnerability, and we look at vulnerability a lot, so whether that's... Domestic abuse, hate crime, stalking... those- those kinds of things. Sexual abuse, sexual offences” (Interview, IA). The *flexibility of the arrangement* accommodates civil society organizations' *different accountability needs*. Some come from very confrontational backgrounds vis-à-vis policing, others have a history of mutual consultation and partnership, while others still have opted to combine stances at

different levels of engagement, from serving or advocating for the needs of individual victims at the street level to national political interactions, to improve police practice and policies in the interests of their users. Irrespective of their previous interactions, however, the relational posture of civil society organizations when joining a SC is a way to *maximize the effectiveness* of the support they offer to vulnerable communities. Most of our interviewees repute this arrangement as antagonistic enough to maintain a critical perspective. Other arrangements such as “advisory boards” or “learning forums” develop a “sense of camaraderie,” a “friendship that's kind of looking out for each other rather than questioning.” In these circumstances, working together creates a “peer pressure” that jeopardizes the *ability to challenge public institutions*. The interviews revealed diffused awareness that challenging public institutions and their procedures is crucial, even when the organization decides to embark upon more collaborative forms of interaction with police forces:

“We have to be always mindful of who it is- whose interests it is that we're serving. So you know, yes we can be cozy, and we can be friendly. But that doesn't mean that we're not challenging - we should be always challenging. And questioning. (Interview, CSO).

Not only does the nature of a complaint allow exchange, preventing the danger of interest capture, but it also signals to the constituencies of civil society organizations their untarnished *independence from police interlocutors*. In the vivid words of our informants, the purpose of maintaining “a sensible caution to how one interacts with them” without “getting too cozy” is an explicit move to preserve the rights of and trust with the victims they are serving: “the reason we didn't want to create any suggestion we were in cahoots with the police (...) was to protect our clients. And they need to

know that I'm not- as it were, joining forces with the police" (Interview, CSO). By joining the SC, organizations do not send confounding messages to victims and maintain what some consider their reputational integrity:

"So in terms of reputational harm, the risk was pretty low. Reputational harm will mean different things to different organizations, but I can say with absolute certainty that from a legal position, from a lawyer's position at least, it was really important that we weren't seen to be part of the system" (Interview, CSO).

On the side of police forces, our interviewees shared a view of the SC as a precious channel to *hear perspectives* and situations they didn't see and to *actively encourage communities*, or segments of the population who would not normally seek their support:

"And I think the, the, the beauty of - of super complaints is that actually identifies issues that we may not necessarily see alone as an organization, even in contact with different groups. When I saw that [Super complaint] report I felt quite reassured about the usefulness of the SC because [City] is a really multicultural city and we've been, we've been working on honor-based abuse, particularly, for a number of years. But we do recognize we still have sometimes... unheard victims. And they're unheard of because we aren't as proactive as we can be, in encouraging those people to come forward. So actually I see those sorts of super-complaints as a positive because they provide a platform for openness, for awareness. And hopefully, for victims to see, to see that, and encouraging them to sort of engage with us" (Interview, Police Organization).

Relational drivers for police organizations include reputational incentives with respect to their inability to access, hence to serve all victim groups, without working on how they

are perceived in terms of trust and confidence, especially in light of UK policing's long principle of "policing by consent", which makes listening fundamental. Independent agencies confirmed an overall attitude of police organizations as being open to listening, to "understand the problem", to "get better," and "to be part of the solution," although, as it will be presented later, the specific types of problems raised through SCs have in some cases triggered less sanguine reactions in the policing ecosystem.

Revealing and substantiating the social equity footprint of policing

Civil society organizations detect what they see as failures and problems in how police forces carry out the business of policing. Designated bodies, or (as discussed earlier) civil society organizations entitled to submit super complaints, rely on sources of information that range from victims who contact them directly to the grassroots organizations they partner or work with, for example, by providing training or expert advice. For some issues, a confluence of various actors arises, "from victims' groups to defense lawyers" willing to lend their voice, expertise, and experience, especially after an SC has been launched and has gained visibility.

Designated bodies act as collectors of evidence by creating a safe platform for community organizations to share information. They often refer to carefulness in referring to the grassroots organization in their reports, to make them feel "protected" and "confident." Receiving funding from the police or working in local partnerships with the police "wouldn't stop smaller organizations from speaking out" and "sharing their data," but designated bodies intentionally named only the organizations that wanted to be included; otherwise, they would write reports that "wouldn't identify them too much." Some grassroots organizations, in fact, need to maintain constructive relations with the

police, when serving victims requires “knocking at doors.” For example, those “that are supporting those women, they have to maintain reasonable and cordial relations with the forces that they are asking to investigate on behalf of their clients” (Interview, CSO), to the point that one of our respondents stated it would be “negligent” towards their users to behave otherwise.

The engagement with frontline organizations and other organizations typically allows designated bodies to “see the picture” and the “systemic pattern as a whole,” as more or less scattered evidence is gathered, creating awareness about the problem. This process often entails *connecting bits and pieces of information* generated across time and space: “looking through a lot of data and saying actually that’s happening here and we’ve got something very similar happening over here. So just sometimes you have to get into the, into the weeds, into the data of things to spot those issues” (Interview, IA). Across sectors, our respondents use metaphors of revelation as in “joining dots” or “connecting dots,” “seeing different sides of a particular issue” “drawing those things together.”

Critical mass of cases in different parts of the territory and/or across time is often a trigger of this awareness: “one case could just be an officer was having a bad day. But when you've got a substantial number of cases, that could indicate there's a problem with training or practice. Or culture” (Interview, IA). Respondents referred to issues that are “deep-rooted”, that “have been in place for years”, “across the country, in different contexts” and of which police forces “haven’t had sufficient oversight.” The independent agencies with a mandate to carry out regular investigations acknowledge the difficulty of identifying systemic problems with traditional public procedures: “the current system [...]

overly regulated and very complicated legal system – so it doesn't give us the ability to look for those patterns and spot those trends.” The awareness is transmitted from the designated bodies to the independent agencies. Although emotions and pathos enter into the conversation, as it is clear that “it's things they [the designated bodies] feel very passionate about, very strongly about, so you'd still get that emotion”, the role of these organizations is really *to consolidate individual experiences* and feelings and to distill them adding a layer that independent agencies value and refer to as ‘vicarious’ or ‘filtered experience.’

Designated bodies feel empowered to understand and articulate problems based on their own expertise and their unique proximity to the *lived experience of the victims*. This type of evidence, they argue, confers *legitimacy* to their position that is by no means weaker than traditional forms of authority:

“I think it's not the fact that because a police officer or someone in a position of high standing says something then they are the overall arbiter on it. I think it's also the extent to which in the organization you're in, you feel able to assert your position, or the needs of your service users, has just as much weight as any other- kind of traditional authority” (Interview, CSO).

By blending evidence based on the experience of the victims with a clear procedural understanding, designated bodies are keen on questioning the *modus operandi* of police forces. Reflecting on their own approach, interviewees used often expressions like “*challenging authority* rather than deferring to authority” and being “in the business of challenging” as a way to get accountability from the police and the government and to gain justice. In turn, independent agencies recognize the importance of this type of

legitimacy, based on a unique type of expertise that is not easily achieved, but requires access to the direct experience of victims.

Designated bodies feel a duty to challenge police forces also because *other public agencies*, in their view, *rarely do so*. They refer to “an unspoken kind of code” that comes from working together that doesn’t leave any room for mutual criticism but, quite the opposite, leads to a reciprocal defense of each other, like in meetings where “the police force defends social services, and the social services will defend the police” (Interview, CSO). This lack of cross-checking is reinforced by a division of labor and of expertise within the public sector, whereby, for example, “if the police are saying 'we can do this, and we can't do that, and the law tells us that we can do this and that,' you won't get somebody from the health service challenging that” (Interview, CSO). While several police informants involved in local multi-stakeholder arrangements portrayed them as (ideally) an equalizing platform for participants, a ‘go along to get along’ dynamic is also reflected by one such account:

“It is a partnership meeting. It's owned by all of us and I think that... occasionally people kind of forget that, and they kind of ask permission for things. It's like... [...] 'Oh, can I refer this into...' It's like, well if you think it's high risk and you think the risk is there, that it needs to be discussed, then that's your decision— just refer it in.” (Interview, PO)

Leveraging on their expertise based on victim experience, and unafraid to challenge public authority, designated bodies engage in discursive practices to *specify problems* connected to government policies and practices. Problems can be created, from civil society perspectives, by the absence of policies or by their erratic application because the policy “hasn't been disseminated properly amongst front-line officers.” For example,

the experience of victims may become a “postcode lottery” depending on whether police officers, also thanks to local projects and training, have a certain awareness “of domestic abuse or other forms of gender-based abuse.” Problems can also emerge as unintended consequences of policy, and civil society organizations begin to perceive that a specific legal change sets off a pattern of negative effects on communities. Problems may also depend on how police forces prioritize competing priorities.

These types of problems display an element of unexpectedness and are revealed, in their existence or magnitude, thanks to the designated bodies’ vantage point and those of the community organizations they interact with. Other problems instead are not new, but the knowledge about them and their dynamics lies in different government agencies, and it is only thanks to a super complaint that this fragmented evidence is brought together and integrated: “I do think each of the super complaints has been an opportunity for us to delve more deeply into something that otherwise might have been on the radar of the three organizations, but probably not in the depth that it was necessary to understand the problem” (Interview, IA).

The last type of problem is unrelated to issues that hadn’t been examined before, or where the compartmentalization of evidence among different actors precluded a substantive understanding. Rather, they are issues that “are known, but that nobody knows what to do about them.” Independent agencies have a mixed reaction toward this occurrence. They often acknowledge the importance of stimulating reflection about problems related to policing, even those that are unlikely to be addressed without legislative changes. They also understand that designated bodies keep raising issues in different forums because they have not yet received a response which satisfies them.

However, they feel the SC system is not set up to respond to those, or at least not “in the way that they’re looking for. They’re looking for something radical.” (Interview, IA).

Problem specification is not a single, one-sided stage but rather a process through which both designated bodies and independent agencies exchange, complement, verify, and ultimately strengthen evidence.

Designated bodies refer to this process of “gathering,” “shaping,” and “collating” the evidence. They referred to strong collaborations and going back and forth with other organizations to ensure the evidence submitted was strong and included the voice of victims, who are the ones who truly know what “on the ground, what really happens, rather than just what the state bodies are reporting” as well as public sector ‘voice’, as embodied in official policy reports, statements and data from policy organizations and police forces. The designated bodies often meticulously define and contrast what the public sector says and appears to know and do about an issue against the experience of victims, nailing down precisely what they saw as wrongdoings and why existing initiatives, reports or policy work cannot be used to brush off their call for deeper analysis: “We produced case study after case study, tens and tens and tens of case studies. Arguments really, really rigorously put forward. Argued very well. The legal arguments were strong. That’s a lot of work.”

Independent agencies engage with this evidence. Our interviews revealed a genuine interest in and consideration of the lived experience of victims reported through the voice of designated bodies but also heard in person during meetings organized precisely to foster exposure to the problems encountered by individuals interacting with police forces, such as in “the meetings with survivors, that made a massive difference.”

(Interview, CSO) Without talking to victims as well as police, one agency argued the investigation wouldn't have "much weight", so that they often pushed for having affected individuals heard in person.

Independent agencies also start their own process of data collection. They reported, for example, analyzing sources of evidence they had exclusive access to, such as "written and audio and body worn video records" keeping in mind the specific perspective of the super complainants, asking the local forces "to send in their policies, reviewing them, seeing how well they align with the national policy." They try to maintain a neutral posture, and their role is to balance the different views, recognizing the need to incorporate the voice of police and their experience. During their investigation, interviewees specifically referred to the need to remain "a bit less emotional, a bit detached", although while drafting their investigative report on the super complaint, they deliberately allowed emotions to resurface, to give justice to the lived experience of the victims and to convey the impact that police actions can have. The stage of data collection and analysis is careful and politically sensitive. Navigating contentious issues entails being considered legitimate players and acting in a rigorous manner by both sides. Independent agencies realize that the process requires their best efforts to collect robust data and signal to the respective interlocutors that there are no biases in one direction or another. They also revealed a special caution in gathering extensive data and including voices to "stand up to critiques" by designated bodies. At the same time, they needed to carefully depict a balanced view to "substantiate" the evidence. An example shared by one of our informants is the way in which wording is crucial to convey legitimacy and precision to the data, combining negative and positive examples

from the side of the police. Demonstrating attention and committed engagement with the evidence is crucial to retain not only civil society organizations but also police forces in the collaboration, especially considering that this arrangement is based on soft powers and persuasion. Along these lines, independent agencies engage in a constant exercise of *sense-making* throughout the process and all the way to the recommendations. During their investigation, for example, research instruments such as surveys are drafted using a language that is coherent with the feelings of victims as represented by designated bodies. In parallel, they check with the internal stakeholders whether the tone is right or it's unduly harsh, and whether the recommendations point to actions that are somewhat feasible, "because there's no point in us making a recommendation that 43 police forces say "we can't do". There's no point. All we're doing is we're setting every police force up to fail, so there's no point".

Final act: Pursuing collective accountability

So far, five complaints have concluded, each with a final report following a public investigation. Final reports, which mark the end of the procedure, were published between 2020 and 2022. Looking back at their experience with the super complaint(s), participants held different views on the process and its outcomes. The purpose of the study was not to engage in a policy evaluation exercise. In any case, the temporal bounds of the procedures and limited time elapsed since their conclusion limit our ability to gauge their outcomes in a complete way, given that this is an initiative that, as we will explain next, is often enacted more as a stepping stone within broader, multi-channel strategies for change on each side, to work on the problem in a framework that we see as the pursuit of collective accountability.

All quarters involved generally perceive their investment in the arrangement as highly demanding and resource intensive. A critical note that emerges recurrently in our interviewees with designated bodies is a call for more teeth. They share some degree of disappointment towards an arrangement that can only generate recommendations, which they argue can be easily dismissed by public actors. It is a system that “puts quite a lot of the investigation on the complainants themselves, in order to meet the threshold for investigation. And then [they do their] investigation and can only make recommendations and can't enforce them” (Interview, CSO). In turn, according to the government independent agencies, the fact that this type of SC is often part of broader accountability strategies by civil society organizations carries significant risks of ineffectual use of the system by blurring the accountability focus, especially when it shifts attention from the “systemic issues in policing” to “policy issues that concern policing,” or “from how police are using that legislation” to “the efficacy of the legislation itself.”

Clearly, the super complaints system is not immune to critiques, especially connected to what we see as a mismatch between many participants' motivations in joining such an arrangement versus the allowances of a design without binding consequences.

However, there are several avenues through which the arrangement facilitates the pursuit of social accountability within the boundaries set by the procedure and beyond.

Starting from individual victims, who lamented to designated bodies and independent agencies about the idea of ‘never getting justice,’ the arrangement acknowledges some of the failures, and it is even perceived as cathartic in some cases: “Coverage that the Super Complaint got [...] was a moment of like, catharsis, victory or whatever. It gave

them a sense of justice that they hadn't had before" (Interview, CSO). Moving to civil society organizations, including but not limited to designated bodies, extensive coverage of the problem and of the civil society organizations that promote them is a result in and of itself, as it raises the profile of their issues and, for organizations that often rely on voluntary contributions, it can also increase their status in the public sphere and their ability to catalyze attention and resources. Furthermore, the evidence collected through the super complaint is scrutinized, substantiated and further developed by the independent agencies in resonance with public sector ideals or precepts like the public interest and pragmatism, conferring greater legitimacy which allows the evidence to be employed extensively in civil society's further engagements with government. These ongoing negotiations, as well as government's own efforts to address some of these problems, lead to regulatory spillovers in the public policy and service ecosystem that narrow or enlarge the unit of attention of the super complaint and often dovetail with parallel attempts of activists both outside and within the ranks of the public sector. Dissemination and training activities build on the expertise developed during the procedure by civil society organizations and independent agencies and are also based on the thick evidence and reasoning available in the reports. Notably, condensed collaborative dynamics and a constant exchange for the procedure lead to cross-sector dialogues and galvanizing or "uniting the sector", or the coalescing of intra-sector communities around issues.

At the time of writing, the latest two super complaints submitted are still under analysis. Our most recent round of interviews consistently points to an evolution of the arrangement, through attempts to incorporate the lessons learned during the first

completed procedures. Closer collaboration among the independent agencies, building on their respective competencies in leading the investigation, a focus not only on whether alleged problems exist in reality but also why and what may be done about them and explicit dissemination of results in the post-recommendation phase, all indicate learning dynamics that feed back into the arrangement.

4.5 Discussion and conclusion

This study investigated the question of how cross-sector arrangements enable the incorporation of the perspective of impact communities to improve public accountability and service, through a qualitative analysis of the relational dynamics among members of a novel governance channel established in England and Wales to allow civil society organizations to raise evidenced ‘super-complaints’ about problems in policing that cause public harm. The arrangement fits squarely with the family of governance structures and processes that entail voice and collaboration between public agencies and various actors, including nonprofits and the public, to identify problems and design new policy frameworks to address them (Amsler 2016; Strokosh and Osborne 2020), functioning as a vehicle for seeking greater social justice (Blume 2023; Cahn and Gray 2012; Pandey 2022).

Our study is specifically concerned with problems that lie in government intervention, and contributes to a burgeoning strand of literature on social justice in public administration (McDonald 2022; Pandey et al. 2023). Building on notions that ‘social equity footprints’ in government’s blind spots (Nisar, 2018) and discrimination

institutionalized in or resulting from public policy and action are wicked problems per se, we set to explore an arrangement designed to enable identification of this type of problem, responding to the call to engage with phenomena that could seem “too big and too complex” to empirically explore, yet, simultaneously, are “too important and urgent to ignore” (Blume 2023, 33).

The research design allowed us to zoom in on the interaction mediated by the arrangement between two main actors. On the one hand, civil society organizations act as brokers of evidence collected from both individuals and community organizations, and they do so by relying on a specific arrangement geared toward social accountability. This adds promising empirical ammunition to our understanding of how civil society organizations filter public participation (Levin 2022) and act as civic intermediaries between vulnerable communities and the political and administrative order (Buntaine et al. 2021; Cheng 2019; Fernandez and Alexander 2017; Le Roux 2007; McMullin 2020; Strokosch and Osborne 2018), shifting from needs-based service delivery and direct substitution of government to strategies aimed at “facilitating productive accountability between rights holders and government agencies” (Schmitz and Mitchell 2016, 232). Their role is fundamental in making individual voices stronger and heard and in creating a critical mass that turns a thin “retail redress” into a “wholesale redress” (Gauri 2013). On the other hand, a defined set of government agencies receive the evidence, check it, and gather their own sources, playing a corresponding trust and information brokering role, especially on the public side. Their role is key to overcoming public sector fragmentation, and also to ensuring a facilitative

governance stance that solicits and listens to public input, and develops an institutionalized feedback process (Schmitz and Mitchell 2016).

Thus, the study reveals the importance of evidence as a relational mechanism between stakeholders. The main source of evidence and relational currency that stakeholders are determined to share is the lived experience of the victims. Several, recent studies have underlined the importance for public agencies of remaining open to the lived experience of users or victims to address social (Blume 2023) and epistemic injustice (Levin 2022). We tried to understand which are the conditions necessary for such lived experience to emerge, be given 'a fair hearing' and become integrated into policy and administration. Our analysis shows that arrangements need to guarantee a safe place to share and hear this experience. For grassroots organizations that are at arm's length with victims, safety means the possibility of sharing their information and unedited voice of the vulnerable communities with the designated bodies – the organizations allowed to submit super complaints – reassured that their own identity will be protected through anonymity and that their relationships with police forces, often their most important partner in serving and safeguarding their beneficiaries at street level, won't be compromised. Safety for the designated bodies entails the possibility of joining an arrangement whose design does not preclude confrontation among stakeholders.

We found that confrontation has a symbolic and a substantive role. The symbolic, reputational role is crucial for designated bodies to retain the trust of victims and of grassroots organizations that would unlikely reach out to organizations seen as dangerously close to, or 'cozy with' police forces. Substantive confrontation (Poncelet 2001; Ulibarri 2023), instead, is fundamental to pursue accountability by preventing

capture, i.e., a sense of camaraderie and mutual understanding that limits the ability to question and challenge police forces. Through challenge, a cross-sector arrangement can stimulate reflexivity (Cunliffe and Jun 2005; Termeer et al. 2015), working as a device to introduce alternative sources of information, question existing routines, disrupt established understandings, send a fire alarm to policy makers (Gauri 2013) and lead, when necessary, to the construction of new organizational conceptions and social dynamics (Christensen 2019; Lodge 2019). This specific focus on problems inherent in government action and the cross-sector nature of the arrangement responds to the calls for enriching the repertoire of institutional contexts to detect blind spots in public administration (Bach and Wegrich 2019).

The vantage point of our study design, with data collected from both civil society and government, and the complete process tracing of the governance arrangement, allowed us to capture a part of the story less frequently told. There is, in fact, also a lived experience on the other side, in our case, police forces, and an interesting finding is that the government stakeholders involved in this arrangement consider it imperative to guarantee that the voice of victims will be trusted while striving to narrate it as factual and to include the view of police officers, who, in turn, are more likely to perceive it as rigorous and do not retreat to frame based resistance (Gray 2004). Addressing the call of previous studies to abandon a naïve conception of cross-sector arrangements, where the simple exposure of information and the power of transparency will automatically leverage accountability (Fox 2015), we show that only continual, bipartisan and negotiated sense-making efforts of the independent government agencies that orchestrate the arrangement can unleash the transformative potential of voluntary

arrangements (Ansell and Torfing 2021), thus fruitfully incorporating the perspective of impact communities to improve public accountability and service. Remaining open to different voices throughout the process and striving to make sure they resonate with the meaning systems of participants seem key to structuring conflict in a way that is productive, rather than merely antagonistic (Ansell 2011; Gray 2000).

5. Conclusion

This dissertation has advanced a non-ideal theoretical perspective of state learning from civic challenges, in which public administrations can play a unique, active and legitimate role in democratic deficits in modern representative government. Compared to a range of governance arrangements and innovations which seek to address the issue through 'surrogate representation' or command and control accountability, I argue that fostering learning from civic challenges may help to bridge gaps between the 'local, concrete and democratic' and the 'necessarily abstract, centralized representative system' (paraphrasing Pitkin, 2004) in a way which reflects the ever more complex and dynamic environments inhabited by representative government. The perspective is one of public administration 'in' democratic representation and accountability, and its development over the theoretical and empirical inquiry of the dissertation suggests it may be best considered through a cognitive lens. In particular, it encourages us to think about public administration as representative government's peripheral nervous system, capable of acquiring information and knowledge about the public that may be mediated into public policy and administration.

I have made the case that civic challenges, a ubiquitous form of feedback on citizen-state interactions, are an important form of democratic data, and that being attuned to this data enables the state to be – and remain open to – shifting and intersecting problems and groups, and better able to recognize the state's footprint. Other governance arrangements or perspectives – whether minipublics, collaborative governance, representative bureaucracy or traditional hierarchy – implicitly or explicitly

partition issues and interests top down, if not ex ante and centrally (as in 'controlled agency', Bertelli, 2021), then locally and/or through their ongoing activities and evolution. In other words, as organization in any form develops, intensifies or formalizes, barriers for equal participation and influence unavoidably grow for the unorganized. This is not to say such arrangements are not useful; indeed they are often indispensable and unavoidable parts of governing.

With learning from civic challenges, I attempt to characterize a cognitive dynamic in the state which instead enables a bottom-up percolation of public issues and preferences on the basis of being affected by state actions and omissions, through a route which remains open to unorganized groups. I argue it is also therefore of relevance to growing social equity debates in public administration (Pandey et al., 2022) and equity dimensions of the democratic deficit problem. The perspective paves a way for public administration to further explore, explain and address the 'social equity footprint' of public policies, an important topic which has had limited attention in public administration research (Nisar, 2018). Collaborative governance in particular seems to offer ways of facilitating the collective identification and examination of problems faced by even the most marginalized groups, by enabling trust and information brokering and the orchestration of 'safe' platforms of exchange between sectors.

Two important concepts flow from the idea of civic challenges as noisy democratic data, for positive and normative development: civic challenge stewardship and interpretive responsibility. Essays 2 to 4 help to provide more insight on the questions: in what ways are civic challenges 'noisy'? What is it that public administrations can do to foster plural interpretation of civic challenges? And later, how should plural interpretations be

integrated and used in the pursuit of collective accountability (or responsibility)? What does formal interpretive responsibility entail, and what are its normative dimensions? And what does it mean for administration to learn from or foster learning from civic challenges? In this conclusion, I draw together some preliminary insights for answering these questions and discuss the learning perspective and initial findings in comparison with related theories, before outlining future research avenues.

Essay 1 characterized civic challenges as noisy democratic data which PA is in a unique position to process and transmit. Essay 2 reveals a number of parameters and perspectives to elaborate on its 'noisy' character. Positive, neutral and negative valences as well as normative and evolutionary lenses on how they should be handled and why were present in police practitioners' perceptions of what civic challenges may represent. Different motives of complainants and whether or not they are judged as valid within the formal and informal processes used to handle them all indicate different forms and dimensions of noise to be reckoned with for learning in practice. Engagement with complainants and implicated officers, consulting and sharing with internal and external actors, and 'theming' emerged as different activities used in police organizations to interpret, make sense or tune signals contained within the noise. These different noise dimensions and interpretive activities can help to shape further exploration and elaboration of the learning perspective. In practice, the noise dimensions articulated may serve as a helpful basis for practitioners to analyze properties and perceptions of their organizations' corpuses of civic challenges as part of efforts associated with civic challenge stewardship and interpretive responsibility.

A separate, but important element of noise in civic challenges is what is *missing* from the signal. This refers to those individuals and groups who don't bring or pursue civic challenges where other individuals or groups in similar situations might, and is a recognized issue in administrative justice, field literature on complaints (see Porter and Prenzler, 2015 for policing) and access to justice debates more generally (cf. Sandefur, 2019). The innovative governance arrangements explored in Essay 4 were ostensibly introduced by legislators to address disparities in access to, and use of, more traditional administrative justice mechanisms in the policing context. Embedded cases of 'super-complaints' brought by civil society organizations on behalf of the public reflect diverse examples of issues and groups where compounding forms of marginalization and the complexities of competing policy priorities at the frontline of public service may limit civic challenges from some groups. I have argued in Essay 1 that an active stewardship role for PA would entail seeking to understand whose challenges are missing and why, and to facilitate reform to civic challenge mechanisms and handling in order to address unequal barriers to bringing civic challenges. The results of Essay 4 suggest an important role for civil society in supporting members of the public in bringing civic challenges, which can help to address disparities in 'whose voice' may be heard. They also suggest a role for civil society organizations in filtering such voice, offering external interpretations of civic challenges and in identifying and articulating problems in collaboration with PA to promote the mediation of vulnerable and marginalized voices into public policy and practice. Essay 4 thus provides insights into an important limitation of civic challenges as I have defined them (as channeled by traditional administrative justice mechanisms on the basis of affected individuals and specific

decisions or incidents). It also indicates how collaborative governance approaches may offer a hybrid alternative for identifying issues bottom-up.

Policing in England and Wales was the empirical setting of choice for the overall dissertation. It represents an extreme theoretical case in terms of civic challenge types in an effort to *refract* as much as possible the different possible dimensions of noise. Furthermore, recent reforms to the police complaints system – a fundamental element of public accountability in policing in England and Wales and other contexts (Rowe, 2020) – have sought to inculcate more of a ‘learning’ culture (including the innovative arrangement for enabling collaborative identification of problems in policing policy and practice explored in Essay 4).

I suggested in Essay 1 that *civic challenge stewardship* may involve PAs i) being able to inform the public and representatives about the quality and qualities of civic challenge data, ii) working to enhance its quality, accessibility or transparency, or iii) providing context and triangulating information such that mutually meaningful interpretations (especially cross-sector and cross- social groups) might be drawn. The findings in Essay 2 regarding the main interpretive activities PA actors engage in as part of processing civic challenges (for learning or otherwise) provide greater insight for stewardship. Finding more effective ways of *engaging* with complainants and with the officers or staff members complaints concern is an important way in which many individuals or teams with interpretive responsibility seek to improve the signal quality of public complaints ‘at source’. This occurs in individual cases, for example where some professional standards personnel and teams seek timely, direct communication with the complainant by phone or in person rather than relying solely on written complaints, to

improve understanding of the submitted complaint and also to draw out more information than the initial complaint contained. It also occurs across cases, where some professional standards and adjacent teams reported conducting or commissioning survey work to collect feedback from past complainants or subject officers on their satisfaction with the process.

Meanwhile, insights for civic challenge stewardship are also found in the interpretive activities *sharing* and *theming*. Several informants with responsibility for interpretation and/or organizational learning roles described practices of sharing patterns which they identified in public complaints within the organization (for instance through standing governance structures or information-sharing channels or informally) or externally, with community scrutiny panels and similar. Such sharing was portrayed as having the purpose of bringing the pattern to the attention of individuals with apparent responsibility for the pattern (for instance, a responsible officer of a given geographical unit or lead on a specific type of policing), or with a legitimate public interest in knowing about it (as in the cases of sharing with community representatives in scrutiny panel settings). Such sharing represents a form of distributing interpretive responsibility through transparency, in a way that enables interpretive pluralism.

Theming – as an interpretive activity concerning the identification of emergent themes and/or matching of patterns and cases to established themes – highlights possible opportunities and challenges for the concept of civic challenge stewardship in how PA may provide contextual and data quality caveats to support integrity and fact-based interpretations of civic challenges. For instance, some police informants were critical of the ways of measuring complaints under established themes and their implications for

learning or for public understanding: *"I think a little bit more qualitative than quantitative. Be careful about our categories. And actually look at our categories, because they're too blunt. Excess force is a big thing. It ranges from slightly (too tight) a handcuff, through to shooting someone dead. The figure, when it comes out, is no good."* Former Head of Discipline, Large Police Force

Interpretive responsibility is the final main concept introduced in the theory of learning from civic challenges, referring to both a role and a value for PA. Taken as a whole, the empirical work suggests that while interpretive responsibility as a role may be very prescribed for those making individual determinations in civic challenges, a proceduralism often unavoidable for assuring individual justice, there is considerably more discretion in how interpretation happens in the identification and investigation of trends and patterns across cases, and the actions which follow. Essay 2 demonstrates the wide array of orientations towards civic challenges, perceived ends of learning, types of knowledge which are perceived as possible, and different interpretive activities for creating such knowledge. I have argued that this shows how learning accountability is a significantly wider concept than a managerialist notion of performance improvement, and the results in Essay 3 present a picture of learning from civic challenges as having an important bureaucratic-political dimension. This arises as a consequence of several potential knowledge types and learning ends which must be reconciled and prioritized within the resource and attention-constrained organizational environment. These findings suggest it is important to explore further the concept of interpretive responsibility, in both positive and normative terms.

The theoretical contribution of this dissertation is complementary to a number of existing theoretical perspectives, as indicated in the first essay's conclusion. The closest of these is Christopher Ansell's (2012) pragmatist conceptualization of public administration as a key actor in 'evolutionary learning'. In his perspective, public organizations are 'linchpins of democracy' which help to build public consent for government actions and policies from the bottom-up, especially through collaborative governance aimed at problem solving. In contrast, the present perspective adopts a distinctive learning stimulus –civic challenges, which may or may not be mutually interpreted as problems. Rather than helping to build consent bottom-up, my perspective instead emphasizes bottom-up or grounded cognition, and transparent, accountable interpretation and transmission of patterns in civic challenges as noisy democratic data. The emphasis is more on enabling wider public debate, an argument with parallels to Christina Lafont's (2019, p237) conceptualization of a judicial role in 'initiating conversation' between affected minorities and the majority in the case of constitutional judicial review, albeit on a different scale.

Future research agenda

The empirical essays presented provide some initial insights and elaboration of the learning perspective. I have deliberately described my contribution as a perspective rather than a theory— there are numerous other avenues for exploration and testing. One of these is establishing more systematically the presence and evolution of 'learning accountability' developments, if not paradigms, in public sectors across country and policy contexts. Indeed, comparative research is a priority given the dissertation's deep

but singular focus on a single country and policy context. The policing empirical context was chosen as an extreme case for civic challenge types, but it might also be considered an extreme case for organization type. Policing remains one of the most definitive command and control hierarchies among public functions and services. Exploring the theory of learning from civic challenges for such an organizational structure was helpful in the first instance because many mechanisms for administrative justice are designed with legal entities – like public agencies – in mind. However, the plethora of alternative public governance arrangements which operate across organizational and even sectoral boundaries necessitates future research to understand how the notion of learning from civic challenges fits. The arrangements explored in Essay 4 offer one such example, but other arrangements in different country and policy contexts are needed. For example, how might learning from civic challenges work in the context of regulation, rather than service provision?

While comparative research is a clear priority, there is also value in building up further detailed and deep cases for learning from civic challenges. In a sense, this has parallels with the substance of the perspective itself (in which learning can occur from single cases or multiple cases or from civic challenges in statistical form). Indeed, the extensive qualitative data collected as part of this dissertation revealed a number of examples of cases where informants felt that civic challenge-led learning was transformative to whole policing approaches (for instance responses to mental health incidents, domestic homicide investigations and in public order policing), which would be promising avenues for detailed case analysis and comparison.

The octopus/nervous system analogy I have used in framing the overall dissertation may be used to generate potentially fruitful lines of inquiry. Discussing the mutability of proprioceptive signaling, for example, Tuthill and Azim (2018, p198) raise the question of *“how feedback is ‘tuned’ during different behavioral contexts [...] a key control parameter is feedback gain: the ratio between the motor output and sensory input of the system. In some cases, proprioceptive feedback gain should be high to maximize sensitivity to useful peripheral information.”* In comparative analysis, it would be interesting to explore where learning policies, systems and commitments in political-administrative systems have been emerging, why, and to what effect. Such inquiry may helpfully contribute to more recent PA research themes of policy or environmental turbulence (Ansell, Sørensen and Torfing, 2023), which represent a more dynamic characterization of environmental challenges and risks public agencies face compared to (implicitly) more stable ‘wicked’ or complex problems (see for example Scognamiglio, Sancino, Caló, Jacklin-Jarvis and Rees, 2023 p55).

As described in Essay 1, the learning from civic challenges perspective in part calls for exploratory work to go ‘in search of the mechanisms’, but it is also a call to imagine a new and underappreciated role for PA in representative government’s means of understanding the public. I consider there to be great potential for participatory action research to better understand what PAs can learn from civic challenges, how and with what effects. Indeed, in the course of my qualitative data collection for this project, some police force insiders were actively looking for outside help with interpreting and analyzing the rich data they hold on civic challenges like complaints, suggesting this is an area of PA practice which is ripe with opportunities for research collaboration,

perhaps bringing new natural language processing analytical techniques to bear (Kowalski et al, 2020). Indeed, there seems to be much scope also for exploring how digital technologies might foster learning mechanisms. A dimension or public value which is implicit throughout the perspective and what it recommends is transparency, a rich and growing area of literature itself (Cucciniello, Porumbescu and Grimmelikhuijsen, 2017), with which the next steps on developing this research will be crucial, particularly given the need for protection of privacy in what can be sensitive cases for members of the public and for public servants.

In closing, and returning to the nervous system metaphor, I note the following case of the consequences of losing proprioceptive capacity and what it implies for a state which is more or less able to sense its own posture and position in changing societal and institutional environments:

[P]roprioception, the sensation of body position and movement, is fundamentally personal and typically absent from conscious perception. Nonetheless, this ‘sixth sense’ remains critical to human experience, a fact that is most apparent when one considers those who have lost it. Take, for example, the case of Ian Waterman who, at the age of 19, suffered a rare autoimmune response [...] that attacked the sensory neurons from his neck down. This [...] deprived him of the sense of position, movement and touch in his body. With this loss of feedback came a complete inability to coordinate his movements. While he could compel his muscles to contract, he lost the ability to orchestrate these actions into purposeful behaviors, in essence leaving him immobile, unable to stand, walk, or use his body to interact with the world.

Tuthill and Azim (2018, p.R194)

In discussing the evolution of intelligence in different species, the philosopher Peter Godfrey-Smith (2018) suggests that a “large nervous system evolves to deal with coordination of the body, but the result is so much neural complexity that eventually

other capacities arise as byproducts, or relatively easy additions” (p72). This dissertation has found evidence of such capacities in administration for learning from civic challenges, and has theorized that such learning capacities can help to bridge the local-central, concrete-abstract, democracy-representation divides which are the cause of much concern in a global context of increasing turbulence. Much future work is needed to both understand and shape such developments in the public interest.

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Appendix

Appendix 2.1 Interview protocol for police informants

Brief introduction of the project (including confirming informed consent)

Introductory questions

1. What is your current role in the police force? How would you explain it?
2. How long have you been working in this role? In the force?
3. How would you describe the role of your team?
4. What sort of experience have you had when it comes to formal complaints or challenges brought against the force by members of the public?
 - Complaints – internal
 - Complaints – externally (IOPC) handled or investigated
 - Legal challenges – civil claims, judicial review

Civic challenges and police force learning

5. Could you please describe in your own words how [complaint or challenge processes] are handled in your organization?
6. How do you see the role of the individual(s) who brings the original challenge or complaint in the force's [complaint] process?
7. In your experience, how would you describe the outcomes or impacts of [complaint or challenge] processes?
 - On the individuals or team(s) involved in the force?
 - On the wider force?
 - To what extent do you think such processes help or hinder the force's work?
8. When we talk about a police force 'learning' from complaints by members of the public, what does that mean to you?
9. Can you think of any examples of when and how you think there has been learning following one or many [complaints/claims/judicial reviews] in your force? [Use of force or policing of domestic abuse as prompts if necessary]
 - Points to probe: what was learned, why informant believed learning happened (e.g. most important factors), learning outcomes/changes in

behavior or policies/procedures, areas of organization involved and their roles, interactions, temporal elements.

10. In your experience, how often has your force been able to 'learn' something from [complaint or challenge] processes it has experienced?

- [To prompt if more detail needed / stop & search? Use of force? Domestic abuse cases?]
- If so, what sorts of things does it learn?
- If not, why not?
- If 'it depends' – on what?
- Does it learn from individual cases? Trends in cases?
- [For informants who have direct experience of multiple types of challenge – e.g. complaints and judicial review] What about [other challenge typ–] - has the force learned from those?

Diversity, working relationships and redress processes

11. In your experience, to what extent is it normal or acceptable in your force to express disagreement?

- To probe: Within teams? Between functions (e.g. operational and civilian teams)? Between hierarchical levels? (e.g. junior to senior)? Examples?

12. In your personal experience, how would you describe relations between:

- Men and women in your force?
- *[As appropriate/subject to time]* Ethnic groups in your force?
- The force and women in the local communities served?
- *[As appropriate/subject to time]* The force and ethnic minorities in the local communities served?

13. Would you say your ethnicity or your sex is significant in some way to your identity as a member of your police force?

- To how you relate with others in the force?
- To how you relate with members of the community?

Wrap up / conclusion

Appendix 2.2 Civic challenge normative orientations – supporting quotes

Normative orientation with decision-making mode and normative goal (Adapted from Adler, 2003)	Additional quotes
Bureaucratic <i>Applying rules for accuracy and neutrality</i>	<p><i>"[...] there is a very clear and defined procedure which is followed and there's always evidence of that procedure being followed because it's well established." Superintendent, Medium-sized Force</i></p> <p><i>"It's pretty well set out now in the in the statutory guidance about the standards expected when dealing with the complainants themselves." Senior Officer, Small Police Force</i></p> <p><i>"once complaint and conduct matters become serious, it's a very strict, regulatory process. That has to be followed. It's not - you know, this is a good idea to deal with it in this way - there (..) is law that we have to follow, there are regulations that we have to follow." Chief Inspector, Large Police Force</i></p>
Legal <i>Asserting and balancing rights for legality and neutrality</i>	<p><i>" a member of the public has a right to complain. You know, if they're dissatisfied with the service, with the police or- or a member of staff." Digital Forensics Manager, Medium-sized Force</i></p> <p><i>"So it's almost like a vicious circle when it comes to stuff like that. The public expect me to do something. You want me to leave you alone, 'cause you feel like you're not doing anything wrong. But we're in the middle of it all. And we've gotta do something." Chief Inspector, Medium-sized Force</i></p> <p><i>"previously [...] we'd just deal with it in isolation - you hit them with the baton, was the use of force lawful- and was their arm breaking just as a consequence" Head of Professional Standards Department, Large Force</i></p>
Managerial <i>Managerial autonomy</i>	<p><i>"If we see the same problems happening constantly and we see the same issues coming up constantly [...] That is an improvement that we can do. That is something that we need to tackle [...]we're actually costing the force more money by having to pay out these claimants because we're getting it wrong" Paralegal, Medium-sized Force</i></p> <p><i>"They do help the force's work, [...] where things are proven- to have dropped below an acceptable standard, you do see changes... happen because of them" Media and Public Engagement team member, Small Force</i></p>

<p><i>for enhanced performance</i></p>	<p>" [...] the volume of work meant that [...] it was a process and they were looking to deal with a case and clear the numbers, 'cause the performance indicators was on the number of complaints outstanding and the time frame in which they were cleared, not necessarily on the value of the learning, or outcomes." Former Lead on Organizational Learning, Professional Standards Department, Large Police Force</p>
<p><i>Public-centered</i></p> <p><i>Public engagement and participation for public confidence, consent, welfare</i></p>	<p>"We deal with people in very difficult circumstances, so there are always gonna be complaints. I think also the attitudes of frontline cops have changed in the last few years, there used to be an attitude 'if you haven't had a complaint, then you've not done your job right', and actually I think that's changed- people have started to 'o 'you know we [...] should be avoiding complaints by dealing with people in a decent way', so over time, the culture's changed" Media and Public Engagement team member, Small Force</p> <p>"[...] you can't have a police service that's not answerable to the public, you know, Robert Peele's old 'the public are the police and the police are the public', so- you- we can't just blunder through ignoring, [...] while we police by consent, we actually do use force on the public, at times and when appropriate- you can't not listen to the people that you police, and you have [...] to do it with respect." Head of Professional Standards, Large Force</p> <p>"Well- from our perspective it's about reinforcing public confidence in the force, and how a member of the public will be treated and dealt with. In [...] any kind of general contact with the force whatsoever. So if you have any contact with a member of our force and it's not as efficient, quick, prompt - or polite [...] then that's going to have - a minimizing effect on whether or not you're actually going to talk to us again in the future." Detective Chief Inspector, Large Force</p>
<p><i>Social</i></p> <p><i>Mediation and coproduction for justice and welfare</i></p>	<p>"I think quite often, they've [complainants] been wronged. And quite often, the emotion of that, even if it's a really small thing with the police, is massive isn't it, cause it's like a whole institution doing you wrong." Police Constable, Medium-sized Force "</p> <p>"Especially around things like discrimination, [...] it can feel like your integrity is being questioned. and that you're not trusted. The way in which that complaint is brought to the attention of the complained about officer and can have a massive effect [...] so it's really important as a line manager that you are really careful and gentle about how you do that. Because yeah, it can have a huge emotional... Effect on people" Sergeant, Large Police Force"</p> <p>"The other challenge, though, is [...] it makes officers feel fragile and vulnerable because the- the protest has always been well, 'we also do some good work', which is not [...] in denial. You also have to address the bad work which has been done, or the harm or the impact, that's where the problems are, so... We when these things - complaints are coming through, it also puts... The police service in a- in a fragile state." Project Manager, Large Force</p>

Appendix 2.3 Purposes of learning from civic challenges – supporting quotes

Second-order themes	First-order concepts	Additional quotes
Control <i>Learning to be accountable</i>	Demonstrating alignment	<i>So we- we keep a running spreadsheet, so every single claim that we investigate if there are any lessons learned that come out of that, they are recorded, and there's obviously therefore an audit trail. (Interview, medium-size force)</i>
	Optimizing responsibility and supervision	<i>[W]henver there's even a low-level complaint, the learning comes out of it, and if it requires a policy change or a supervisory change, then it's- it's – I've a lot of confidence that that then translates into the operational workplace, which it probably didn't many years ago, if I'm honest. (Interview, small force)</i>
	Optimizing processes	<i>We can address that with the people involved and then look for any wider learning for the team or for the organisation. If it's an issue with the process, then you know we - We look then to amend that process. (Interview, medium-size force)</i>
	Frontline competence development	<i>It's not a sanction, it's not [...] oh, you're guilty, you've done something wrong. It's just that you need to reflect on your practice. You need to reflect on [...] how you deal with these sort of things, and always consider -- you know, how is this going to impact the wider community? How is this impacting the very person that has been accused or that the allegation has been made against. What has caused it? Do you know anything about them? What do you know about them? You know? So yeah, that's how that – learning can be delivered. (Interview, large force)</i>
Protection <i>Learning to minimize risk and harm</i>	Mitigating risk	<i>A lot of our [e-learning] packages, I'm not being funny, you can set them off running, you can go for a cup of tea – [...] Um, I don't think they work very well if I'm honest... Because people can say 'yeah I've done it', and that is... [...] a bit of a... protective factor for the organization. Saying, [...] if something happens to the individual, "you've had this training"... But... A lot of them haven't. Because they're not really engaging with it, because it's bloody boring, isn't it? (Interview, medium-size force)</i>
	Prevention of or minimizing harm to the public	<i>(.) it meant a lot of money. Because to get rid of all our CS [tear gas] [...] and then buying a new bulk load of PAVA [an alternative] – it was it was [...] quite expensive, but the chief at the time decided 'No - that's the best way to go. Less likelihood of people being injured [...] Less likelihood of complaints.' So that was that was the result of a cluster of complaints along the same lines. (Interview, medium-size force)</i>
	Protecting or minimizing harm to officers	<i>I've been involved in the independent ethics panel [...] and looking at matters that were circulating in... National press, you know, high profile. High profile people then</i>

		<i>coming forward and accusing [Police Force] officers of being racist [...] in national press, and we quite quickly picked up on that. I was tasked in to pull together all of the information in the timeline and actually the lived experience was really well-documented in terms of [...] of body worn video footage. Dash cam. So officers are equipped in a way where they can protect themselves (Interview, medium-size force)</i>
Stabilization <i>Learning for external alignment</i>	Aligning with law and external guidance	<i>Potentially data sharing issues – when they say [on a Whatsapp group] 'I'm going to execute a warrant tomorrow morning at such and such location. Is anybody free to help me?' [...] that's potentially data protection breach because we don't own that and [...] there's the potential we might lose control of it and X, Y and Z, so these are [...] minor variations, but they're stuff you would want to address. (Interview, small force)</i>
	Aligning with systems and institutional actors	<i>[...] It would be around monitoring of- say, speeding or something like that. Um, so we would monitor the number of complaints that we receive about speeding, and we would look at the location that most of those complaints are coming from, so say right, you know there's clearly a problem here, you know, what are you doing about it, [Police Force]? And then it would be a question of monitoring that, going back to it, and seeing if those complaints will, will fall over time, for that particular area. (Interview, Office of Police and Crime Commissioner)</i>
	Aligning with public expectations and understandings	<i>So for example, there was one I dealt with a while back, which was a claim came in [...] what I identified was that the form that the claimant had filled out during part of that police process could have probably been [...] clearer [...], and there wouldn't have been that ambiguity [...] So I went back to the department and said, look, I think we need to redesign this form just to make it a bit clearer. So that [...] was a different type of - way of responding [...] that learning identified. (Interview, medium-size force)</i>

Appendix 2.4 Interpretive activities – supporting quotes

Second-order themes	First-order codes	Exemplary quotes
Engaging	Seeking deeper understanding of complaints	<p><i>It's trying to create a dialogue with the complainant. To keep them involved in the process as much as we can. (...) to try talk to them, and get their view of things as much as possible. (Interview, Office of Police and Crime Commissioner)</i></p> <p><i>[...] you can get lost in the regulatory framework, but the most important thing for me is what do they actually - what do they want from it? You know some people want you know- get the inspector to shout and them and that's fine, other people, you know, 'I want them hung, drawn, quartered, locked up for 12 years and sacked', and it's like- so it's just about listening to what they want, what they- what a successful outcome is, and helping the complainant to shape that. (Interview, large force)</i></p>
	Educating or addressing complainant misunderstandings	<p><i>So we tend to try and myth-bust more than answer a complaint. If it goes to a complaint, then I think it goes to the next level from us. (Interview, small force)</i></p> <p><i>Sometimes it's just a case of explaining perhaps police procedures (...) or ways of working which-would [...] - enable them to understand what happened. Because if you don't know the law, and you don't know the operational processes, you might believe that something's been done incorrectly that in fact, there's a valid reason why it's been done that way. So sometimes it's just a matter of explaining, and helping them to understand (...) why what happened, happened. (Interview, large force)</i></p> <p><i>[...] it may be that - how they've been treated by officers and staff was actually correct, but they're not educated in - why the officer has acted as they have. So a simple explanation might open up that perception for them (Interview, large force)</i></p>
	Engaging with officers to establish facts and protect welfare	<p><i>[...] you need to make sure that the officers are happy that they've got somebody that they trust, that that can act as a conduit between the organisation and the investigation [...] So- so in extreme cases, where the officers go off sick with stress... We need to make sure that [...] we've got - not necessarily daily contact, regular contact with them, making sure that they're OK [...] (Interview, small force)</i></p> <p><i>[...] from my own experience was the fact that this individual was absolutely lying. There was no credibility in what they were saying and stuff, and I had all the evidence and support... [...] I'm quite (open) to say this, during that time because of the nature of the complaint, I went off with stress, depression, you know mental health effects and stuff like that. Uh, but what my organization did is</i></p>

		<p><i>clicked on, quite quickly, like -- this is impacting on me, and provided me with the support that I needed in order to, you know, deal with the situation that I was in [...] (Interview, medium-size force)</i></p> <p><i>So part of my role as I see it as well is to reassure the officers. That for us to have the transparency, we need to be able to stand the test of scrutiny within complaints and if there is learning then take from it you know, but sometimes if the complaints are vexatious then it's for the welfare of the officers. It's also good for that complaints process to be navigated, because... It means, then that... in fairness to those officers, they don't have to have to repeatedly explain themselves. (Interview, medium-size force)</i></p>
Sharing and consulting	Consulting with the public and public scrutiny groups	<p><i>What we've started to do is where we've had really difficult complaints, is have a review with some members of the public. (Interview, large force)</i></p> <p><i>We ran it by a group of outside people. Some experts subject matter experts etc, etc. (Interview, medium-sized force)</i></p> <p><i>So I guess without the push from those outside advisory groups we might not gone down that route. And consequently, touch wood, we seem to get far fewer complaints alleging discrimination than most of our sister forces (...) (Interview, medium-sized force)</i></p> <p><i>And then on any sort of intended training or inputs or something, I sort of use that as a platform of consultation. And the IAG for the VAWG is massive. And there's a lot of survivors on there. So it is very much - an independent advisory group made up VAWG survivors. So I'm happy that that is my-public consultation aspect of the process. (Interview, medium-size force)</i></p>
	Consulting with experts and partners	<p><i>Basically it's just about ensuring [...] people from a black, Asian and minority ethnic background are supported in the organisation because we are conscious of disproportionality and also we are a resource to the police service on matters or of race. Formally, [...] we are invited to Gold groups - which is gonna be chaired normally by an Assistant Chief Constable or - or the Deputy Chief Constable where... A problem statement comes to light and again we give that... That cultural experience lens, and challenge... What sometimes is perceived as procedurally correct and but from a justice perspective, is wrong (Interview, medium-size force)</i></p> <p><i>But fraud - we get a lot of complaints about fraud. So again, we had a briefing by the fraud team about-- so that we could understand it, and - and we've put together some fraud information for officers across the organisation, 'cause it's actually not as straightforward as you might think. (Interview, small force)</i></p> <p><i>So, when I was doing it, I would do it in conjunction with the force leads and subject matter experts, the College of Policing lead, or relevant approved professional practice, and the National Police Chiefs Council lead for the relevant subject areas. (Interview, large force)</i></p>

		<i>It's our lessons, but the IOPC are invited, the Commissioner's Office are invited, and then the independent ethics panel are invited as well. So it's transparent, and - you know, it's very honest conversation. So it is just about [Police Force] and it is just something that we do here from our complaint analysis, but we have partners and stakeholders involved. (Interview, medium-size force)</i>
	Broadcasting to the workforce	<i>We now have mechanisms [...] so I produce a monthly report which goes out to all senior officers, and actually it's got a subscription list now. So it's proving quite popular. Interview, small force)</i> <i>[W]hen you have so many, staff working in the Constabulary, there are so many -- it's trying to get that communication across to everybody. [...] So it's having bulletins on the Intranet, so it's kind of like passing all that information across. So I would say the hardest bit is - and because things change on a daily basis as well? So it's trying to get that information passed across to everybody who works for [Police Force] 'cause it can change in a second (interview, small force)</i> <i>[...] occasionally something does come in which we all need to take note of. And maybe there might be some- some e-learning [...] or there's some podcasts, or some --we publish a magazine every quarter (...) which comes from PSD. So we highlight some of the things that people have got wrong with a view to hopefully make sure nobody else does it wrong (interview, medium-size force)</i>
	Sharing with public, community and issue groups	<i>So as I've mentioned, that legitimacy panel to try and get community leaders in so they can then talk to people in the community and say hang on, they are listening. (Interview, small police force)</i> <i>I think that they're useful in the sense of at least you get to scrutinise and... Look at or dip sample how things have been done, so whether it's training, [...] police tactics, methodologies, etc. (interview, medium-size force)</i> <i>They've been around for, (.) uh the last 10-15 years I'd say. Um, scrutiny panels certainly over the last 5-6 years, have been well-embedded. And we have- we also have independent advisory groups, so you'll have sort of community leaders, for each area of the force that will [...]give us advice as a critical friend and, uh help us try and rebuild confidence or give us an idea of how the community are feeling about how things are going (Interview, large force)</i>
	Sharing interpretive responsibility with the hierarchy	<i>[...] show where we're failing in a particular area. And I'll let people know that are responsible for that area. (Interview, small force)</i> <i>The bigger issues that we don't have so much control over, I sit on the legitimacy and learning panel, which happens every... three months. And I give them a whole list of things . This is what you need to change. (Interview, small force)</i> <i>... They're an asset (...) because it is, basically... You look at sometimes difficult to watch footage and it's being critiqued and... The head will go to the various leads of various areas- who have to then now respond to the feedback being given. (interview, medium-size force)</i>

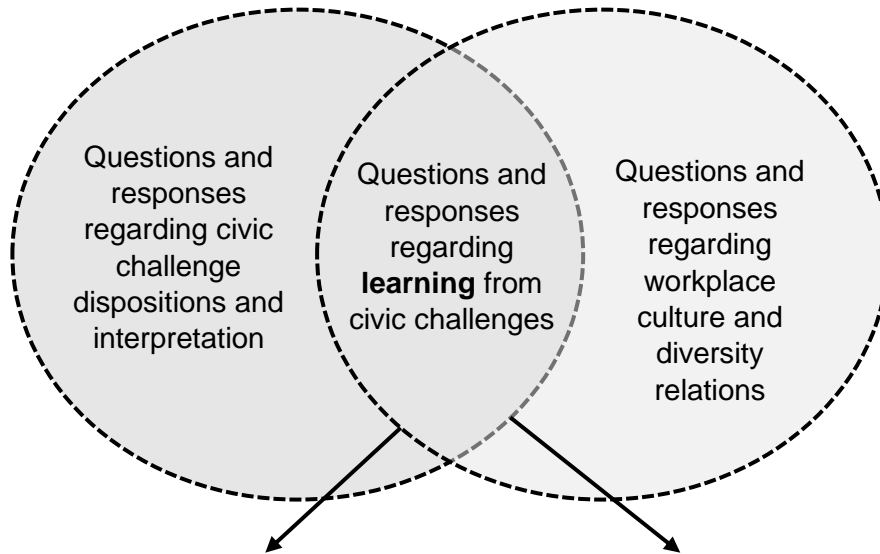
		<p><i>I've come across an officer in [place] who clearly is - quite rude to people. She generates a lot complaints by herself. Very proactive- very, very robust. But very - short with people. And so- I specifically go to [Place] and say- what are you doing about this officer? Because she is a complaint-attractor. And I actually action them to address that behaviour. So whether it's strategic or quite tactical, I - I get the information in, I assess it, and then I feed it back out to the appropriate parties for action. (Interview, medium-size force)</i></p>
	<p>Sharing to responsabilize and gain insight from the rank and file</p>	<p><i>That was a really a really good back and forth because we could talk it through. And by the end of it he can understand kind of where I'm coming from. And the rest of the group of sort of then thinking right, that's pretty unambiguous. I- I know that now. And it gives us an indication of maybe... where the issues are, and how widespread there (Interview, small force)</i></p> <p><i>So um, so in that scenario, then I think sometimes the complaints that are coming through, we're able to apply that learning to the individual and say, well, you know... when it's time to complete your use of force form, you need to really try and recall all of that detail, (...) And he was open then for that to be subject to discussion with the wider team, you know. So then you can sit down. With the team and say you know, from this officer's experience, it'd be good for us all to sit down and just look at the standard and quality of the use of force records that we're keeping (Interview, medium-size force)</i></p> <p><i>We have our official courses... But actually if we see something that's really poignant and we can start to just talk about it in our in our courses just to raise that awareness, especially with newly qualified to sergeants who and that might not be on their radar (...) (Interview, small force)</i></p>
Theming	Emergent theming	<p><i>So - by addressing - that we've got this theme - we can then turn that into a conversation about what solutions look like. (Interview, large force)</i></p> <p><i>Well, I guess the mere fact we have recorded it ethically and we've got it there, even though we might not be able to do anything about it, it's there for posterity (...) you know, if you then gotta- if you then got a load of similar complaints, then that's the foundation stone and think 'Right. OK, now's the time we're going to have to do something about this' (Interview, medium-size force)</i></p> <p><i>We'll kind of we'll look at well what cases have we had that might have been similar before? Have we made any recommendations about this before? (Interview, medium-size force)</i></p> <p><i>We used to get the spreadsheet so we could identify patterns and clusters. This is well before our IT system was capable of linking stuff up. And it was really useful and my boss used to every every month we used to sit down, and go through it. Well, where are we with this? (Interview, medium-size force)</i></p> <p><i>Yeah, so we are just [...] capturing all the data – so when an officer is asked to have some reflective practice with their line manager, the conversation that they have, or the essence of that conversation is captured on a form [...] at the moment that's all collated, and from that, we've done some basic</i></p>

		<p><i>analysis. So we can look at demographics, you know, so gender, ethnicity, age, etc. To see if that tells us anything. We can look at the nature of the complaint. You know, is it the same thing time and time again, because if that was the case we could say, you know 'we've got an issue with X Y and Z on - this division, or that division'. Erm, and then we can start er, looking at a solution for that. [...] We're just doing a bit of analysis around that at the moment. (Interview, large force)</i></p>
	<p>Established themes</p>	<p><i>[I]f we start at the top level, the IOPC will, will kind of pick up themes of, police learning from across the country from all the complaints that they're dealing with. That's fed into police forces on a quarterly basis, you know our [...] our head of professional standards- will be picking that up and looking at ways of, of, you know- do we need to change our policy, practice, do we need to go back and do any quality assessment on, um, a particular process or policy (Interview, large force)</i></p> <p><i>So, a bit more thinking around the [complaint] categories. Some explanation of it, some education around it. And you know, it just needs a bit more work. (Interview, large force)</i></p> <p><i>So nationally, the top three kind of complaint categories throughout all of the forces are - incivility - so rudeness around how people are dealt with - assault, um, because no one likes to have handcuffs put on them, when they've been arrested so they claim they've been assaulted. And uh, stop and search kind of complaints. (Interview, large force)</i></p>

Appendix 2.5 Civic challenge knowledge types – supporting quotes

Second-order themes	First-order concepts	Additional quotes
Knowledge about the public	Knowledge of public vulnerabilities, risk factors for harm	<i>So things like, you know Hillsborough, things like some of the—CSE [child sexual exploitation] in Rotherham. Without actually - investigations into those processes and what went wrong... We would never have been where we are now in terms of...we're a lot better at recognizing vulnerability. Sergeant, Medium-sized Police Force</i>
	Knowledge of cultural differences/sensitivities	<i>[...] various examples of some things that hadn't gone very well, and to try and prevent complaints coming in where people are complaining that they've been mistreated, discriminated against for whatever their protected characteristic may be, to give people like a real broad perspective of what could be not just direct discrimination, but indirect and all the [...] other funny little ways that the people can feel they've been treated less favorably. Professional Standards staff member, Medium-sized Force</i>
	Knowledge of public expectations and understanding	<i>One of the things we often hear is 'oh, when there's an accident, the roads are closed for far too long', and people don't understand that that could be a crime scene, so it has to be treated in the same way as if it was an assault, but what we started doing was just explaining what was happening a lot more [...] Otherwise, they think [...] we cone everything off for the fun of it. Media, Public Engagement Team, Small Force</i>
Organizational self-knowledge	Knowledge of officers' social behaviors, beliefs and knowledge	<i>[O]ne of the officers [...] he'd done his 30 years, then he'd rejoined [...] But what we didn't do as an organization was look at what his experience was prior to retirement. So basically we put him in an operational role, even though he'd been in an office function for many, many years. So he wasn't [...] equipped to deal with the sorts of [...] situations that we were asking him to deal with. [...] organizationally we have learnt that we need to do a training needs analysis for returning officers. Chief Inspector, Medium-sized Force</i>
	Knowledge of process or system gaps	<i>[...] I've introduced things just within my own teams before, which, as it was a complaint from a member of the public, [...] actually, that could easily happen again, but if we just introduced this simple process or this simple check at that point there, we'd be able to get rid of that. And then I feed that into the wider community in terms of - my Chief Inspectors who will then it feed it to Inspectors and ultimately to force level. To say 'this is what we're now doing to try and alleviate this' Response Inspector, Medium-sized Force</i>
	Knowledge about external institutional gaps and understandings	<i>Or if you found that [...] stop-and-searches were habitually abused across [the organization], then that would suggest an organizational issue in terms of lack of understanding of police powers and how they should be used and implemented, which would lead to a- which would require a- force-wide training, knowledge input and development issue. Interview, Large Police Force</i>

Appendix 3.1 Interview data uses in Essays 2 and 3



Empirical content employed

- What is or can be learned
- Purposes of learning

- Means of integrating new understandings
- Conditions of learning

Research questions

- *How are civic challenges interpreted and handled within police organizations?*
- *What (if anything) do police organizations learn from public complaints?*

- *What organizational conditions favor or constrain learning from civic challenges?*
- *Does social representativeness within police forces affect the nature or likelihood of organizational learning from civic challenges, and if so, how?*

Areas of literature drawn on

- Interpreting and sensemaking phases of organizational learning
- Administrative justice and socio-legal studies

- Organizational learning conditions and integrating, institutionalizing phases of learning
- Diversity management

Appendix 3.2 Lesson salience and integrity – supporting quotes

First-order code	Supporting quotes
Lesson salience and integrity	<p data-bbox="500 333 1419 548"><i>[...] What we've done now is the training follows the format where you watch a video, of an incident that's – normally – gone wrong. [...] So it's kind of scenario-based training for the real world, as opposed to - this is how you handcuff in a perfect world where no one's struggling."</i> Head of Professional Standards Department, Large Police Force</p> <p data-bbox="500 590 1419 804"><i>They don't always see the value and especially some of those that have maybe worked without that type of technology for 20-25 years and then all of a sudden we're going to record their every movement, you know, sometimes there's a hesitance with that. But the way that I've seen that overcome is where you can show the benefits"</i> Neighborhood Inspector, Medium-sized Force</p> <p data-bbox="500 846 1419 1129"><i>[...] when I watch body worn camera footage and I think, oh I really like how the officer dealt with that. Because that really helped to de-escalate that situation. With the result that I'll feed that back into our personal safety training, and say 'you might want to use this as an example. You know when you're talking about use of force, de-escalating a, you know a potentially volatile scenario'. And you know, it keeps it current. It's relevant. [...]</i> Civil Claims Investigator, Medium-sized Force</p> <p data-bbox="500 1171 1419 1602"><i>"I think the- a lot of the things they put in place to stop negative things happening wasn't very practical. In your day-to-day job. So it might have sounded good. Or, intentions might have been good. Er - like a lot of stop and search things. It might've sounded good but it just wasn't practical. So something'd come out in London where- someone had been - they'd been handcuffed- stop and search - they were a reasonably famous athlete. So - you know, you all get briefed on that. And it was like, well consider it... You don't have to handcuff people. Every time. But then, you'd go on another bit of training, where they'd be telling you best practice is to always do it. If that makes sense."</i> Former Police Constable, Large Force</p>

Appendix 3.3 Summary of quantitative data used in Essay 3

Variables	Data	Sources
Police force experience with civic challenges – as ‘learning stimulus’	<p>Formal complaints (annual volume, disaggregated into complaint types)</p> <p>Calculated as the change in police forces’ total or per-officer complaints between year t-3 and t-2.</p>	<p>Independent Office for Police Conduct published statistics (accessible at: https://www.policeconduct.gov.uk/research-and-learning/statistics/police-complaints-statistics) and a more granular data set provided under freedom of information</p>
Learning outcome: Reduction in future incidence of similar claim types	<p>Same as above, calculated as the change in police forces’ total or per officer complaints from year t-2 to t.</p>	<p>Same as above.</p>
Share of workforce which is female; black; minority ethnic (an aggregate of black, Asian, mixed, ‘Chinese and other ethnicity’)	<p>% shares based on Police Workforce statistics</p>	<p>Home Office, accessible at: https://www.gov.uk/government/collections/police-workforce-england-and-wales</p> <p>and</p> <p>https://www.ethnicity-facts-figures.service.gov.uk/workforce-and-business/workforce-diversity/police-workforce/latest</p>

Variables	Data	Sources
Workforce social group 'fractionalization'	Inverse Herfindahl Index scores calculated based on ethnicity-sex pairs as organizational subgroups (i.e. Asian women, Asian men, black women, black men, etc.)	Same as above
Workforce social group 'concentration'	Calculated as difference between (the larger of) fractionalization within police staff (civilian) and police officers	Same as above
Police and Crime Commissioner election years	Dummy variable if time t is a PCC election year	(Public information)
Organizational size	Total workforce as all police staff plus police officers – from Police Workforce Statistics	Home Office
Local population size	National population statistics (mid-year estimates) applied to Police Force Areas	Office for National Statistics (ONS), accessible at: https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates Police Force Area codes accessible at: https://www.data.gov.uk/dataset/40ae8fa6-8efd-40e5-aff6-2792c3c0f90d/police-force-areas-december-2019-names-and-codes-in-the-united-kingdom
Local deprivation levels	Households Below Average Income Index (HBAI)	Department for Work and Pensions, accessible at: https://www.gov.uk/government/collections/households-below-average-income-hbai-2
Body worn cameras per officer	Original data	Collected by researcher using local and national press reporting and published freedom of information requests

Appendix 3.4 Pair-wise correlation tables

Variables	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
(1) No. complaints recorded in year t	1.000								
(2) Number complaints per capita (all staff)	0.002	1.000							
(3) Growth in stop & search complaints (gross) (t-3 to t-2)	-0.516***	0.052	1.000						
(4) Growth in discriminatory behavior complaints	-0.159***	0.064	0.254***	1.000					
(5) Growth in oppressive behavior complaints	-0.102*	0.082	0.061	0.207***	1.000				
(6) Fractionalization (sex and ethnicity)	-0.468***	0.254***	0.209***	0.129**	0.157***	1.000			
(7) Concentration between functions	0.927***	-0.078*	-0.514***	-0.326***	-0.213***	-0.419***	1.000		
(8) Proportion of workforce which is BAME	0.724***	-0.158***	-0.321***	-0.213***	-0.200***	-0.864***	0.711***	1.000	
(9) Growth in general standards complaints	0.046	0.054	-0.014	0.008	0.038	-0.023	-0.003	0.018	1.000
(10) Growth in operational policies complaints	0.044	-0.078	-0.010	0.010	-0.004	-0.101	0.111*	0.110	-0.064
(11) Growth in operational management complaints	-0.019	-0.057	0.033	-0.012	0.018	-0.119*	-0.004	0.069	0.370***
(12) Growth in incivility and intolerance complaints	-0.441***	0.097*	0.220***	0.098*	0.039	0.286***	-0.443***	-0.386***	-0.015

*** $p < 0.01$, ** $p < 0.05$, * $p < 0.1$

Pairwise correlations continued

Variables	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
[...]									
(13) Growth in fairness and impartiality complaints	-0.030	-0.016	-0.101*	-0.169***	-0.078	0.111**	-0.010	-0.099*	-0.007
(14) Growth in other sexual conduct complaints	0.035	-0.049	-0.001	-0.096*	-0.004	0.016	0.047	0.022	-0.087
(15) Deaths following police custody	0.437***	-0.096**	-0.219***	-0.027	0.100*	-0.197***	0.408***	0.326***	0.070
(16) Asian officers and staff (%)	0.474***	-0.140***	-0.201***	-0.139**	-0.153***	-0.837***	0.474***	0.922***	0.010
(17) Black officers and staff (%)	0.870***	-0.086*	-0.429***	-0.283***	-0.220***	-0.678***	0.893***	0.878***	0.013
(18) Chinese & other ethnicity officers and staff (%)	0.872***	-0.124**	-0.397***	-0.248***	-0.209***	-0.473***	0.841***	0.685***	0.023
(19) Mixed ethnicity officers and staff (%)	0.543***	-0.227***	-0.223***	-0.138**	-0.148***	-0.798***	0.474***	0.823***	0.033
(20) White officers and staff (%)	-0.724***	0.158***	0.321***	0.213***	0.200***	0.864***	-0.711***	-1.000***	-0.018
(21) Force diversity - female officers & staff	-0.243***	-0.071	0.115**	0.023	0.028	-0.069	-0.260***	-0.075	0.053
(22) Total workforce	0.975***	-0.179***	-0.478***	-0.286***	-0.228***	-0.508***	0.935***	0.757***	0.003
(23) Body worn cameras per officer	0.032	0.098*	-0.005	0.033	-0.016	-0.249***	0.000	0.131**	0.063
(24) Deprivation in population served	-0.110**	-0.206***	0.067	-0.006	-0.021	0.203***	-0.044	-0.117**	0.037
(25) Population of Police Force Area, based on ONS mid-year estimates	0.955***	-0.169***	-0.444***	-0.141**	-0.119**	-0.543***	0.874***	0.773***	0.029

*** $p < 0.01$, ** $p < 0.05$, * $p < 0.1$

Pairwise correlations continued

Variables	(10)	(11)	(12)	(13)	(14)	(15)	(16)
(11) Growth in operational management complaints	-0.020	1.000					
(12) Growth in incivility and intolerance complaints	0.127*	-0.055	1.000				
(13) Growth in fairness and impartiality complaints	0.064	-0.167**	0.378***	1.000			
(14) Growth in other sexual conduct complaints	0.159*	-0.025	0.008	0.060	1.000		
(15) Deaths following police custody	0.111*	-0.061	-0.139**	0.005	0.106*	1.000	
(16) Asian officers and staff (%)	0.083	0.075	-0.294***	-0.112**	0.002	0.217***	1.000
(17) Black officers and staff (%)	0.149*	0.051	-0.413***	-0.042	0.038	0.375***	0.663***
(18) Chinese & other ethnicity officers and staff (%)	0.065	0.020	-0.395***	-0.060	0.040	0.412***	0.413***
(19) Mixed ethnicity officers and staff (%)	0.079	0.056	-0.302***	-0.098*	0.027	0.251***	0.671***
(20) White officers and staff (%)	-0.110	-0.069	0.386***	0.099*	-0.022	-0.326***	-0.922***
(21) Force diversity - female officers & staff	-0.047	0.143*	0.074	-0.030	-0.072	-0.141***	0.018
(22) Total workforce	0.078	0.014	-0.452***	-0.036	0.051	0.450***	0.514***
(23) Body worn cameras per officer	0.052	0.104	-0.048	-0.176***	-0.010	0.021	0.101*

(24) Deprivation in population served	-0.005	0.110	0.044	0.048	0.001	-0.031	0.017
(25) Population of PFA, based on ONS mid-year estimates	0.076	-0.005	-0.436***	-0.060	0.046	0.466***	0.534***

Pairwise correlations continued

Variables	(17)	(18)	(19)	(20)	(21)	(22)	(23)	(24)	(25)
(18) Chinese & other ethnicity officers and staff (%)	0.782***	1.000							
(19) Mixed ethnicity officers and staff (%)	0.681***	0.601***	1.000						
(20) White officers and staff (%)	-0.878***	-0.685***	-0.823***	1.000					
(21) Force diversity - female officers & staff	-0.130***	-0.304***	-0.052	0.075	1.000				
(22) Total workforce	0.890***	0.885***	0.580***	-0.757***	-0.228***	1.000			
(23) Body worn cameras per officer	0.076	0.048	0.279***	-0.131**	0.168***	0.012	1.000		
(24) Deprivation in population served	-0.094*	-0.274***	-0.389***	0.117**	0.166***	-0.053	-0.349***	1.000	
(25) Population of PFA, based on ONS mid-year estimates	0.859***	0.887***	0.640***	-0.773***	-0.251***	0.975** *	0.066	-0.143***	1.000

