

Risk Communication

A Guide to Regulatory Practice

This guide has been produced for managers and staff in Government Departments and their Agencies, particularly in regulatory departments, to help improve policy and practice in risk communication. It is based on a project carried out in 1997-98 involving case studies of recent Government experience, and surveys of literature and practice more widely. The project was carried out under contract by AEA Technology, managed by Mr Tony Taig. It was sponsored and steered by a Group whose members were:

*Ms Nicola Baker, Cabinet Office Deregulation Unit Ms Sally Burlington, HM Treasury
Ms Colleen Bowen, Health and Safety Executive Dr David Coles, Department of Health
Dr Chris Fisher, Ministry of Agriculture, Fisheries and Food Dr David Hewkin, Ministry of Defence
Dr Peter Hinchcliffe, Department of the Environment, Transport & the Regions
Ms Pat Kilbey, Department of the Environment, Transport & the Regions Dr Jean Le Guen, Health and Safety Executive
Mr Peter Rimmer, Health and Safety Executive*

Correspondence and requests for further information on this study should be addressed to:

*Ms Colleen Bowen
Health and Safety Executive
Risk Assessment Policy Unit
L7SW Rose Court
2 Southwark Bridge Road
London SE1 9HS*

Foreword

Communication is of fundamental importance in the regulation of risks. It allows people to participate in, or be effectively represented in, decisions about managing risks. And it plays a vital part in putting decisions into practice - whether helping people to understand regulations, informing them and advising them about risks they can control themselves, or dissuading them from antisocial and risky behaviour.

A recent study sponsored by the Interdepartmental Liaison Group on Risk Assessment (ILGRA) found many examples of good and improving practice in risk communication in Government Departments. But it also found that communication is sometimes seen simply as “provision of information”, rather than a two-way process which engages people in discussion and debate. Furthermore, there are times when communication is “bolted on” rather than integrated into the decision making process.

This document, endorsed by ILGRA, sets out four simple principles to help departments look critically at what they do and improve the way they communicate about risks. It provides a framework of questions to help departments and agencies implement the first and fundamental principle of integrating communication into the regulatory process. And it provides some simple guidance, illustrations and pointers to developing good practice on the supporting principles - listening to stakeholders, tailoring the messages and managing the process.

I am pleased that this guidance is being launched with the Better Regulation Guide and the Regulatory Impact Assessment Guide. The documents make up a comprehensive package which will help departments to make better decisions and better regulation, protecting people and ensuring wealth creation and quality of life for this and future generations.

Dr Jim McQuaid
Chairman, Interdepartmental Liaison Group on Risk Assessment

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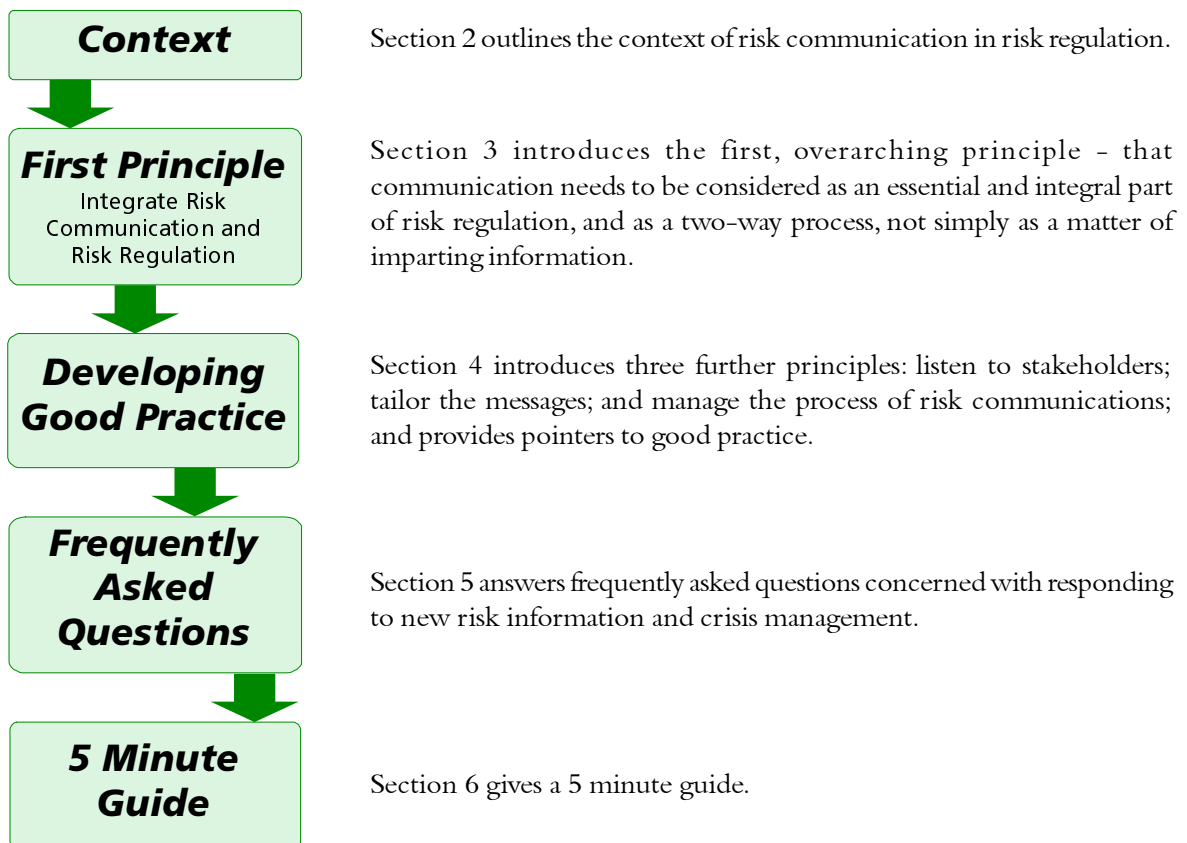
Section 1

Introduction

Risk communication is essential in making decisions. It enables people to participate in deciding how risks should be managed. Communication is also a vital part of implementing decisions – whether explaining mandatory regulations, informing and advising people about risks they can control themselves, or dissuading people from risky, antisocial behaviour.

Four principles of good practice have been derived from a research study “Risk Communications – Benchmarking in Government” (reference 1). The first principle is to integrate risk communication and risk regulation. The three supporting principles are to: listen to stakeholders, tailor messages and manage the process. Most of the anecdotes in this report are drawn from the study, which included case studies, literature surveys, workshops and experience from industry and PR.

The guidance is given in five sections following this introduction.



The guide is not intended to impart general communication skills, nor does it provide a prescription for guaranteed success. Communication activities and approaches must be tailored to the specific objectives of each individual risk regulation activity. The guidance is framed primarily in the context of policy and management, rather than in the context of staff “in the field” interacting with the public.

Government is capable of communicating very well about risk, and has been steadily improving its performance in risk communication (in the view of people outside, as well as inside Government). This guide aims to disseminate good practice. We hope you will enjoy reading it and find it helpful. Comments and suggestions for improvement will be very welcome, and should be sent to the secretariat of the Interdepartmental Liaison Group for Risk Assessment (address inside front cover).

Section 2

Risk Communication in the Regulatory Context

Good regulation should . . .

. . . enable people to
make or participate in
their own decisions
about risks

. . . reflect people's
views and preferences
in decisions about risk
which affect them

. . . implement decisions
about risk management
effectively, once they
have been made

The Government decides if risk management should be the province of personal choice, regulation, or a combination of the two. Whichever route is taken, risk communication is central to the two key regulatory activities: *making* and *implementing* decisions about risk management. Communication is central in choosing the right route and in doing the job well, and is a risk management option in its own right.

Making the decision is considered in terms of three steps, each with a communication element:

- *Framing* – the regulator must find out how much the risks matter, to whom and why, and agree an agenda with them.
- *Examining options* – both factual and subjective opinions must be brought together to develop and evaluate the options for the way forward.
- *Adopting decisions* – the regulator supplies information to decision makers (who could be officials, elected representatives, or individual citizens), supports the decision process and helps communicate and justify centrally made decisions.

Implementing the decisions is considered here as comprising two steps (including a feedback loop), each with a communication element:

- *Implementation* – people must be involved, informed, instructed, supported, advised, convinced and influenced, as appropriate.
- *Evaluating effectiveness* – people must be asked the right questions, and their answers interpreted, to provide feedback from the interested parties on policy and its implementation.

When the Government decides that people should make their own decisions about how to deal with risk, the communications requirements of Government are generally:

- to understand the information people need to help make decisions,
- to ensure that unbiased information is available to them, and
- to advise and help support decision making.

In this situation, communication is often the principal instrument for putting policy into practice. Communication is an alternative to regulation. It can defuse the emotions of minority pressure groups, and eliminate the need for excessive legislation.

When the Government decides to regulate the activities of individuals or industries to protect those exposed to the risk, there is a more complex set of communication requirements including:

“Good regulation . . . enables people to participate in decisions . . . this can only be achieved by communication”

- □ gaining consensus on the level of risk one person/group may impose on another,
- devising regulations generally accepted as fair and reasonable,
- ensuring all involved understand the regulations and how to comply with them,
- □ enforcing compliance on those who ignore regulations,
- □ ensuring those at risk have access to information about: the risks, the controls put in place by those who create them, and what they themselves can do to limit risk,
- □ monitoring and improving the rules, their relevance and acceptance, and compliance with them.

Good regulation reflects society’s informed values and preferences. It enables people to participate in decisions, and to assist willingly with compliance. This can only be achieved by communication - both listening to and engaging people, as well as informing them.

Section 3

Integrating Risk Communication and Regulation

The first, overarching, principle of good risk communication is:□

1. Integrate Risk Communication and Risk Regulation

Engagement and dialogue with those interested in and affected by risk issues is vital. It should be an integral part of every process for the management and/or regulation of risks. Communication should neither be treated as a bolt-on extra, nor approached solely in the context of one-way provision of public information. The aims of risk communication should be:

- to enable the effective participation and/or representation of all interested and affected parties in making decisions about how to manage risks, and
- to support the most effective possible implementation of risk management decisions.

Research has shown that:

- *Risk communication is too often regarded as a “bolt on” within Government departments and agencies, rather than as an integral part of the regulatory process. Across Government, scientific input to the regulatory process is invariably strong, but the input of public values and preferences is often relatively weak. The risk of inappropriate transfer of responsibility for decision making to experts needs to be guarded against carefully.*
- *Communication is institutionalised in much of Government as “information”. Government is oriented more towards outward communication than towards establishing two-way dialogue. This means that listening is seldom applied across the whole regulatory process.*
- *Where two-way communication **has** been recognised as an important part of the regulatory process, Government practice is generally good and is steadily improving. This evaluation is supported by interested parties outside Government, as well as by officials involved in the process.*

Recognising the importance of communication

“Publicity should not only be used to draw attention to new measures to strengthen the law, but also on a continuing basis, and it should include educational measures, particularly directed at the young, as well as campaigns in mass media”

[Blennerhasset Report, 1976 - quoted in drink driving case study]

The guidance below is framed in the form of a questionnaire to assist in benchmarking risk communications in regulation. Every Regulatory Department and Agency would benefit from a benchmarking exercise, with top level sponsorship, and broad involvement across functions and internal boundaries. The single most important output of such an exercise should be a clear, agreed statement of the minimum communication objectives necessary for regulatory success.

This section provides a checklist of questions to help you define the risk communication activities needed for the regulatory approach you are involved in or considering. It is presented in four sections, two concerned with making decisions and two with implementing them.

Making decisions – risk communication context and purpose

Who decides risk policy?

"When it comes to making value judgements about risks, it's never going to work to impose a rationalised optimum approach, whatever its logical benefits. Government will have to be brave enough to put all the facts on the table, explain the benefits and disbenefits as well as it can, but then let people decide for themselves to a much greater extent than at present."

[Private Sector comment, from Director of a major UK public service organisation]

- Why are you undertaking any regulatory activity? In response to a specific event, new circumstances or a general concern?
- What are the objectives of your regulatory activity, both quantitative and qualitative?
- How does your regulatory activity fit in with existing regulation and the risk communication already in place to achieve that? Does it:
 - a) extend existing regulations,
 - b) introduce a new area of regulation?
- To what extent are you intending to:
 - a) give people information to help them protect themselves from risks,
 - b) ensure protection for people exposed to risk by the actions of others?

Making decisions – who to talk with and how to involve them

- Who will be affected by or might believe they have a valid interest in either the risks involved or the measures that might be used for their control?
- How will each of these stakeholders participate in the decision making process, either directly or through representatives?
- How do you bring the various inputs (e.g. science, values and preferences) together?
- Who makes the decision? The regulator, public representatives, or a wider audience affected by the risks or with duties to control the risks?
- How do you demonstrate and feedback to all the stakeholders that you have balanced all the inputs in setting priorities and goals?
- What are the communication implications of each option you are considering?
- How do you achieve the buy-in of all the stakeholders to the decision?

Implementing decisions –*the risk communication elements*

Major benefits of involving key stakeholders

In a health scare over phthalate contamination in infant formula in 1996, a major problem was that doctors and other health visitors were not fully briefed on the issue before the story broke, and were thus unable to help advise worried parents. As a result DH and MAFF adopted a policy of getting information early to front line health professionals.

[infant feeding case study]

- □ Does everyone agree what the baseline risk is, and how to measure it, before introducing new regulation or giving people new information?
- □ How do you measure and publicise the achievement of your objectives?
- □ Who needs to know what in order to be able to implement decisions? For example, who are:
 - the people whose activities create risks for others, and who have a duty to control them,
 - the people affected by risks,
 - those to whom people will turn for guidance if they are worried or unsure what to do,
 - those whose actions (e.g. inspection or enforcement) will reinforce or undermine the policy.
- □ How do you inform and enable people to implement policy effectively?
- □ What arrangements have you for checking that they have received and understood what they need to know? (and acted on it)?

Implementing decisions –*feedback and evaluating effectiveness*

- □ What arrangements do you have to collect and act on feedback on regulatory policy and actions?
- □ If the purpose of risk control measures includes providing information and advice to help people make their own decisions about risks, then how do you measure how well information reached them and how useful it was to them?
- □ If the purpose of risk control measures includes controlling risky behaviour, how do you measure and monitor such behaviour, and the attitudes that underpin it?
- □ If the purpose of risk control measures includes providing public assurance, then how do you measure and monitor to determine the extent to which this has been achieved?
- □ What do the public (particularly those affected by your regulatory actions) think of you as a regulator? How do you know?
- □ What shapes or might shape those views (e.g. regulatory policy itself, enforcement activity, contact with staff, responsiveness to enquiries, publications ...) which might provide ways to improve your performance as experienced by those you serve?
- □ How do you let people know what you have done to improve regulation as the result of feedback?

Section 4

Developing Good Practice

Introducing Three Further Principles

These three principles relate to the input, output and management of the processes of risk communication by a regulatory organisation:

2. Listen to Stakeholders

Regulatory bodies should identify and engage with all those interested in and affected by each risk issue. They should seek to understand their attitudes to risks and risk control measures. Their views and preferences should be incorporated into policy and practice. Where practical and appropriate those affected should be involved in or empowered to take decisions about risks and their control.

3. Tailor the Messages

Government messages and communications about risk should be tailored to their audience and purpose. Particular attention should be paid to:

- engaging and demonstrating empathy with the audience;
- displaying openness and responsiveness to audience emotions, fears and concerns;
- demonstrating credibility, competence and commitment;
- articulating the benefits of proposed and/or alternative options for the audience.

4. Manage the Process

Risk communication is always important for policy success. Thus clear, well-defined risk communication management processes and procedures are needed. These should cover setting goals, allocating responsibilities, planning, implementing, monitoring and evaluation.

Listening to Stakeholders and Tailoring the Message

Communication is a 2-way process

"Communication has been institutionalised in much of Government as 'Information'. Provision of information is an extremely important issue and duty for Government. But the focus on information, rather than communication, implies a one-way approach to communication. A change of culture, from information provision to two way communication, is an important underpinning theme in our conclusions and recommendations."

[Risk Communication study report, reference (1)]

Listening to stakeholders, and, in seeking their opinions or making your response, tailoring your message for them is essential at every stage in the regulatory process. There is now widespread awareness within Government departments of the importance of identifying and understanding the perceptions, preferences and values of stakeholders in the risk debate.

Tailoring the message relates to communication outward, from Government to the public. However, effective outward communication cannot be divorced from good listening. A good understanding of people's current knowledge, beliefs and opinions is an absolute prerequisite for effective outward communication.

The first point to remember about delivering a message to people is that what matters is what they hear and understand, which may be very different from what you thought you said.

Research has shown that much of Government's communication about risk reflects the scientific, objective aspects that underpin risk regulation. If these are carried through into public communication, they can easily appear to have taken little account of people's values and preferences.

DECISION MAKING

Framing

Start by thinking through who is making the decision and their needs. Is it the individual citizen? A Minister or other public representative? Or a group of officials and experts? Set yourself clear goals in terms of what you need to know about people's views and thinking about risks in order to help them make good decisions.

Identify whose views and opinions really matter to those making the decision:

- those affected by the risk
- those who create the risk and/or will have to take action to manage it
- those whose opinions, advice or behaviour will influence people's responses.

Be open about what you want to know and why. Don't pretend that your consultation will lead to decisions which satisfy everybody, but do let people know how you will use their input. Thank people for their input, and behave at all times with respect for their opinions, whatever you think of them.

Consultation - some insider views

"We consult very widely on many issues - the process involves sending out documents to a wide distribution and collecting their responses"

"We often find people jump up and down about problems once we implement a new measure - but the same people said nothing at all when given the opportunity to comment during consultation."

"If only we had a better understanding of people's actual concerns and preferences about risks and ways to control them, we'd probably have a lot fewer problems explaining and justifying our approach."

[typical comments of officials in departmental workshops held in 1997]

Public understanding - Government and Pressure Groups

"The pressure groups are just way ahead of Government in their understanding of and empathy with people's real concerns and worries about risk issues."

[Private sector comment, from Director of a major UK transport organisation]

Better messages are built on audience understanding

DETR use opinion research to evaluate and steer communications campaigns in the battle against drink driving.

The "Dave" campaign against drink driving in 1995 achieved phenomenal penetration to and impact on a very wide audience. Marketing magazine reported recognition running at 91% one month after, and 89% six months after, the campaign.

Research in the following year showed that young men, a key target group, had dissociated from the "Dave" message. They were more concerned about harming a close friend or relative and having to live with the consequences than about harming themselves. "Mirror-mirror" campaign the following year built on this concern for others, portraying a young woman passenger scarred in a drink-drive accident.

[drink driving case study]

Examining options

When consulting on any risk issue, although you are essentially in "listening" mode, what people tell you will depend very much on how you pose the questions. Avoid imposing your own view of the issue, or inviting a particular response. Try asking questions differently to different people, and see if and how this alters their response.

Don't presume that everybody else thinks about the issues in the same terms as you do. Be sensitive to and show respect for people's attachment to established ways to control risks, particularly if you are proposing the possibility of significant change.

Wherever possible, try to establish a dialogue with people rather than an exchange in which all they receive from you is standard documents and letters. Be aware of the strengths and limitations of different ways to ask people about their views:

- Sending out a document to selected organisations and individuals for comment may help collect representative views, but favours those with more time to respond, may miss key groups, and often fails to get people really thinking through the issues and practicalities of proposals.
- Tools such as internet surveys, phone-ins and other trawls for opinions and ideas can be very useful in providing anecdotal information about views and preferences. But the balance of opinions expressed by those who "self-select" to respond to such surveys may bear no relation to the balance of opinions in society more widely - never assume that opinions from a self-selected audience are representative of society at large.
- Wider, representative opinions can readily and reliably be measured, albeit at some expense, using opinion and marketing research techniques. These have been refined and developed to a specialist science, and you should consult the professionals rather than reinventing the wheel. The answers will depend critically on how the questions are framed; any good adviser will help you tailor the questions to help you gain unbiased responses.

Systematic, professional marketing and opinion research is the best way to get a balanced picture of how people think about risk issues, and how they are likely to respond to decisions on how to manage risks.

Adopting decisions

Having collected information, think carefully about how to help the decision makers use it. Develop a framework for presenting information which puts opinions and likely responses alongside other important decision factors. Test this with the decision makers. Invite comments and criticism to help you improve the support you provide.

If you are helping members of the public make their own decisions, then you need to understand how they frame and think about the issue before you can provide them with effective information and guidance. You may need to inform them about the issue before you can gauge their needs as decision makers. If you do you must tailor your message to your audience.

If you are supporting decisions made by officials or representatives, then they will need to understand the views and preferences of those involved and affected. Remember that what people say they prefer may differ from the preferences they reveal through their behaviour; it may be valuable to test as well as to ask about their views.

Decision makers will also want to know how people are likely to respond to and act on different decisions. It is vitally important that consultation should explore and test people's likely responses to decisions, as well as their preferences. Again, what people SAY they will do may differ from what they actually do.

"An ounce of empathy, respect, enthusiasm and commitment goes a long way to counter the perception that a decision has been taken . . . without regard to people's feelings."

It is sometimes necessary to explain a decision which you are confident is the best solution, but which you know may receive a negative, emotional response or be subject to appealing "attack by soundbite" by some interested parties. In these circumstances, don't presume that other people will be familiar with or respect the basis on which the decision was taken. So *don't* dive straight into comparative risks, or cost-effectiveness arguments, but *do* give people reasons to trust the decision process, for example by:

- explaining what you (or the decision makers) are trying to achieve, making clear you have your audience's interests at heart
- demonstrating your commitment and competence to deliver what is in the audience's best interests (what proof can you offer that your thinking and approach has benefited your audience in the past?)
- demonstrating your openness to and respect for people's concerns, articulating the benefits of the decision in terms with which your audience can identify,
- being open as to the likely or potential negative aspects of the decision, explaining why in spite of these you feel it is still right.

An ounce of empathy, respect, enthusiasm and commitment goes a long way to counter the perception that a decision has been taken on dry, scientific grounds without regard to people's feelings.

DECISION IMPLEMENTATION AND EVALUATION

Implementation

What you say, what they hear . . .

"Individuals are not passive receivers of risk information, rather, communications are actively filtered through the 'lens' of a priori beliefs and value systems."

[Vaughan, 1995 - quoted in Risk Communication report, reference (1)]

Using statistics PLUS attitudes

"The statistics tell us that there's a disproportionate number of occasional motorway users who ignore the speed restrictions and get involved in accidents in fog. Knowing this, we're now hoping to move on and investigate why it is that this group in particular seem to behave this way so that we can devise better ways of reaching them and changing their behaviour."

[Highways Agency, contributing to crisis communications case study]

Implementing decisions will always involve informing, advising and instructing people. All of these outward communication activities rely on a good understanding of how people think about the issues. You cannot activate decisions without asking people what they think.

Risk management and regulations are intended to help people. People will be much more responsive if they trust you. The best way to gain trust is through dialogue. People will respond far better to what you say and do if they see you as a good listener, so it is well worth working hard to be so regarded. Don't think the information job is done when you've briefed the stakeholders. For example:

- Be ready to respond promptly and effectively to questions about new control measures or risks.
- Carry out an internal "risk assessment" of how you or your organisation might erode your reputation as a good listener.

Identify your target audiences and the key messages you want to convey to each in order to achieve your objectives. Pay close attention to each audience's current attitudes and perceptions, which will shape their response. DO NOT presume that one message will meet the needs of all audiences. Focus on any changes of behaviour and attitude, as well as of knowledge that you are trying to achieve.

In developing your messages:

- Avoid detailed arguments about numerical levels of risk and effectiveness unless and until you have established with your audience how these concepts and approaches will serve their interests
- "Risk analyse" your messages, thinking through who they might alienate and why, and the responses they are likely to elicit from different people.
- Wherever possible, tell people what THEY can do to help control a risk. Lack of control is one of the most frightening factors for many people.

Wherever possible, test the message on a sample audience to see how they respond before communicating it more widely. As a minimum, where time prevents external testing, try it out on a few colleagues who have not been closely involved in the issue.

Timing and co-ordination . . .

"One of the key lessons learned from the Scottish e coli 157 outbreak was the importance of timing information releases, to ensure prior warning for those who needed to know in advance - because of their acute interest (e.g. victims' relatives) or because of their need to be able to brief others (e.g. health professionals, politicians)."

[Crisis communication case study]

"When the Government and [infant formula] manufacturer decided to withdraw the product, the news release was carefully timed to go out in the morning. If it had gone out in the evening, people would not have been able to go out and buy replacement baby milk, or to get advice from doctors and other health professionals."

[Crisis communication case study]

In planning your delivery of messages:

- □ Select people to deliver the message based on their empathy with the target audience, as well as their competence in communication and in the issue in hand. Develop a cadre of suitable people, and help them function as effective communicators, through appropriate training and support.
- □ Manage timing and co-ordination carefully, so that people will receive a consistent message from your organisation and others.
- □ Make sure your likely points of contact with the public on the issue (press office, help lines, enquiry points, inspectors, enforcement officers etc.) are well briefed. When people ask questions they should receive a consistent and satisfactory response.
- □ Liaise with those inside and outside your organisation whose behaviour could erode or reinforce your message - people "in the field" involved in inspection, enforcement, or delivering related services are particularly important.
- □ Identify trusted, independent parties who your audience are likely to turn to for advice, or from whom they will form their opinions. Get them on board early. Conflict among experts will always damage credibility.

When delivering the message, remember that how people respond will depend as much or more on how you say it as on what you say. Give people grounds to trust you. As a rule of thumb for engaging and building trust with your audience, apply the "ECCB" formula illustrated opposite.

Evaluating effectiveness

Listening is particularly important when you are identifying and obtaining feedback from stakeholders on the success of your policy and approach to risk regulation. Section 3 suggests some of the key evaluation questions in different circumstances.

When measuring and monitoring attitudes, opinions, responses and claimed behaviours, use a mix of open questions to explore and understand the issues in qualitative terms, and closed questions (for example in surveys) to provide reliable quantification, and to monitor trends and changes.

THE "ECCB" FORMULA

Empathy	<p>Engage your audience, don't switch them off. Think through what you have in common with them, and what might make them warm to you, or reject you as having nothing to say to them. If you are in a debate and the audience engages emotionally with your opponent, but not with you, you will lose irrespective of the merits of your argument.</p>	<p>The importance of empathy . . .</p> <p><i>"The river contamination incident showed the importance of having good people involved on the ground, who understood local people and issues as well as the geographic and demographic factors"</i></p> <p><i>[Environment Agency, crisis communications case study]</i></p>	
Concern	<p>Always show respect for people and their concerns, no matter how illogical they may seem to you. If you do not show that you care about their concerns, people will never trust you.</p>	<p>Respect for deeply held beliefs and concerns . . .</p> <p><i>"During one public inquiry, a witness came forward to defend the applicant (a chemical company wishing to build a major new potentially hazardous plant). Because the company social club had made a marvellous job of her daughter's wedding reception, she was sure the company would never do anything to damage the local community. It would have been easy to dismiss or rubbish such views, but the Inspector listened with great respect. Instead of going away feeling alienated, that lady went away feeling that her views had been listened to and factored in, in whatever small way, to decision making on an important local issue."</i></p> <p><i>[anecdote related by a former HSE Inspector, land use case study]</i></p>	
Commitment	<p><i>(and competence, and credibility)</i> Provide evidence that you don't just say you have people's interests at heart, but that your track record, or your approach, are proven to do so. Why should people believe that you will be successful in dealing with this risk issue? Think through who might erode or reinforce your credibility, and how to involve or deal with them.</p>		
Benefit	<p>It is vital to articulate the pros and cons of the approach decided upon in terms with which the audience can identify. Be open about disbenefits of your solution, as well as benefits. If you are giving people information on which to base their own decisions, explain how the pros and cons are likely to vary with individuals' circumstances.</p>	<p>Explaining the benefits . . .</p> <p>There is a strong view that Government messages tend to be patronising and give too little credit to the public's intelligence, particularly where the message is of the "here's something new about risk, but don't worry about it" variety . . .</p> <p><i>[observations based on response of parents' groups, health professionals' organisations and consumer representatives, infant feeding case study]</i></p>	<p>Benefits the audience will appreciate . . .</p> <p>The August '95 "Guidelines for Carrot Fly Control" (a leaflet for farmers produced by MAFF agencies in collaboration) contain recommendations on crop planning, in-field and harvesting strategies to minimise the need for pesticide application. The leaflet is very focused on "what's in it for the farmer", and stresses benefits over and above reductions in pesticide use (e.g. in terms of yield, meeting market needs, and minimising effort for the farmer).</p> <p><i>[organophosphate case study]</i></p>

Managing the Process

The importance of process . . .

"Solving the problems of risk communication is as much about improving procedures as improving content. Risk managers need to consider risk communication as an important and integral aspect of risk management."

[US National Research Council, 1989, quoted in Risk Communication report (1)]

Since risk communication matters enormously to a risk regulator, it is important to have well defined processes to establish the necessary risk communication objectives, and to deliver against them.

Different Departments will have different processes in place to manage their regulatory communications. Research has shown that where Government has defined clear communications needs, for example in drink driving communications, they can achieve excellent results when benchmarked against private sector communication and marketing campaigns.

Since much of Government work is about process, it should be relatively straightforward to make steady improvements on this principle. This includes such things as how well the 'phone is answered, and how information is assembled and presented to support decision makers.

MANAGING THE PROCESS - DECISION MAKING

Establish clear responsibilities for achieving risk communication objectives, and identify who needs to do what to ensure they are met.

Make sure you have well-defined processes to:

- ☐ identify the people with an interest in, or affected by risks or risk control measures (include people likely to support or oppose the various options)
- ☐ establish the aims and objectives of consultation with them
- ☐ plan out a programme of consultation which allows all the relevant stakeholders to participate, recognising any special needs or difficulties some of them may have
- ☐ frame and test your questions, consultation documents etc. so as to avoid introducing hidden bias into the responses
- ☐ enable those carrying out consultation to do their job effectively, for example through appropriate selection and communication skills training
- ☐ respond to enquiries and take on board questions or issues which you hadn't thought of, or regarded as lower priority
- ☐ collate and digest and develop the responses you receive, and use them in developing your proposals
- ☐ develop your agenda and priorities, bringing together all the information from consultation and from other sources, and feeding it forward to decision makers
- ☐ feed back to people what has happened to their ideas and inputs to you.

The value of an internal focus for communication

"The existence of a special unit for dealing with major hazards issues provides a good basis for building risk communications skills and experience among staff. . . . The involvement of inspectors in communicating risk information as part of the planning process is critically important, both in communicating and implementing risk policy, and in feeding back stakeholder views and issues to the policy process."

[observations based on comments of HSE officials, land use case study]

Advance planning is paramount . . .

"Crisis conditions demonstrate more than any others the need for well-developed systems, procedures and technology in order to be able to communicate quickly, consistently and reliably with large audiences."

[observation, crisis communications case study]

Combining "hard" and "soft" information to steer policy

"The use of statistics, attitude surveys and focus groups to identify key stakeholder groups and understand their attitudes and how they might be influenced has been a critical factor for success in the targeting of, and the development and testing of messages for, drink driving communication by Government."

[drink driving case study]

Use an appropriate mix of methods to get timely, anecdotal input (e.g. asking a selected few people for ideas, or collecting responses from people who choose to respond to widely broadcast invitations), and more reliable, quantitative representative input (e.g. from properly designed and run opinion research surveys).

Make sure your definition of options for regulatory action includes the communication needed to implement them effectively. Evaluation should take full account of how people's responses might affect the outcome.

Build into your planning and budgeting the time and resources needed to explain decisions once they are made. Identify possible "fright factors" (see Reference 2) which might trigger major public concerns and lead to a greater requirement for communication.

MANAGING THE PROCESS - DECISION IMPLEMENTATION & EVALUATION

Put in place a communication plan which covers:

- □ key audiences, with communications objectives for each
- □ developing and testing messages and means of delivering them to achieve these objectives
- □ allocation of responsibilities and resources for delivering against the plan
- □ links with parallel activities by your organisation and other parties to reinforce the messages
- □ timing and co-ordination of key communications
- □ timely checking of the uptake of information and how audiences responded to it
- □ retrospective evaluation of the plan's effectiveness, in terms of:
 - the ultimate risk outcomes being regulated
 - people's satisfaction with risk levels, risk controls and the regulatory arrangements
 - behaviours which determine levels of risk
 - attitudes and opinions which shape such behaviours,
 - uptake, recall and understanding of key messages about risks.

There needs to be a communication plan for both the decision taking and implementation phases. You need to have in place effective means of dealing with responses, questions and complaints. There should be channels through which people can raise issues which are easy to find and easy to use, and which deliver a reliable response.

Section 5

Responding to Events

The guidance in this section concerns two scenarios of particular interest for sponsors and officials. These are responding to new information about risk, and communicating in a crisis. The section highlights only the additional and particular points of relevance.

Responding to New Information about Risks

Responding to new information about risk is principally an application of “Tailoring the messages” and “Managing the process”. However, note in particular:

- □ It is very useful to screen issues to identify “fright factors” which might escalate the issue to a “scare” story (see opposite – this topic is well covered in reference 2)
- □ Urgency may be needed, but SO ALSO is effective co-ordination. Make sure authoritative advice can be provided on possible impacts on people, *prior* to releasing significant risk information.
- □ Avoid speculation or offering information which may later have to be modified or retracted.
- □ If you are asking people to do something or change their behaviour, then:
 - make sure there is clear and simple advice available for those who want to take it on trust;
 - make sure the supporting information is available for those who want it;
 - □ provide a clear explanation as to WHY you chose the risk management option you did – what were the options, and the pros and cons that led to your choice.
- □ Note especially the need to project yourself into the mind of the audience. Think FIRST of why they should trust you and how your words, demeanour and general approach will affect this, and SECOND about the logic of your arguments.
- □ Don’t frame your statement or message in a way which might appear as patronising, or as implying that you think the risk is trivial.

Don't Panic!!

... the DH sent shivers down our spines by declaring that it "has seen the research papers and there is no cause for alarm" - shades of Corporal Jones in Dad's Army, who would send everyone into a blue funk with his repeated bellows of "Don't Panic!" ...

*Letter from Jonathan Porritt,
Daily Telegraph, 15 June 1996
[infant feeding case study]*

Note: on this topic in particular, see also the recent guidance document produced by the Department of Health, “Communicating about Risks to Public Health – Pointers to Good Practice” ⁽²⁾

Managers should consider the processes, tools and people they need, for example:

- a regular process for trawling news, research and other possible sources for new information which may benefit from wider communication,
- simple procedures and checklists (see for example reference 2), and a focal point for provision of advice and guidance on risk communication,
- a cadre of staff trained in communications skills, if you are likely to have to respond to new information about risk reasonably often.

SOME IMPORTANT "FRIGHT FACTORS"

Risks are generally more worrying (and less acceptable) if perceived:

1. To be involuntary (e.g. exposure to pollution) rather than voluntary (e.g. dangerous sports or smoking)
2. As inequitably distributed (some benefit while others suffer the consequences)
3. As inescapable by taking personal precautions
4. To arise from an unfamiliar or novel source
5. To result from man-made, rather than natural sources
6. To cause hidden and irreversible damage, e.g. through onset of illness many years after exposure
7. To pose some particular danger to small children or pregnant women or more generally to future generations
8. To threaten a form of death (or illness/injury) arousing particular dread
9. To damage identifiable rather than anonymous victims
10. To be poorly understood by science
11. As subject to contradictory statements from responsible sources (or, even worse, from the same source)

[from DH Pointers to Good Practice report, reference (2)]

Communicating in a Crisis

Crisis communication is a well developed discipline in its own right, with a wide range of specialist communications, public relations and crisis management consultancies offering support, training and other related services and professional guidance.

Once again tailoring the message and managing the process are of particular relevance in a crisis. By definition, you get no warning of a crisis, so advance preparation is of particular importance. The supplementary guidance here addresses advance preparation, and some particular points of note during a crisis itself.

Advance Preparation

The first and over-riding guidance is that departments should develop and document a risk communications plan for dealing with crisis situations. Everybody must know where it is, and what their responsibilities are in the event of a crisis. It should include:

- ☐ Key scenarios you might have to face.
- ☐ Key stakeholders who are likely to be involved. These are likely to include:
 - those involved in crisis response (e.g. the emergency services);
 - the media, who may be vital allies in disseminating information quickly, as well as demanding information to help them to report events;
 - anybody who may need to be informed quickly in order to protect themselves;
 - those to whom people will turn for advice on what to do if they are worried about an issue (e.g. medical professionals following a health scare);
 - ☐ people who need to be informed of issues in advance of wider publicity (e.g. relatives of accident victims).
- ☐ The infrastructure, systems and procedures you will need to carry out your own information dissemination, and to respond to enquiries and questions.
- ☐ The identity of your authorised spokesperson(s), who must carry authority, be trained in communication skills and rehearsed in the context of crisis communications. Make sure there is a widely available list of these spokespeople (24 hours a day, 365 days per year if necessary).

Appropriate systems and processes . . .

"A variety of means are used to get warning of an impending flood to households likely to be affected, including

- *automated telephone calling of the highest risk properties*
- *automated communication links between flood officers and local BBC stations*
- *a recorded telephone information line, and*
- *networks of local flood wardens with responsibilities for advising specific groups of local people"*

[Environment Agency, crisis communications case study]

- □ How to collect the basic information materials you will need. If the media cannot obtain authoritative information quickly you may lose the opportunity of getting them to help you communicate important messages to the public. For example, it is relatively easy to foresee that people might want to know how a new drug, or foodstuff, or hazardous installation, is licensed for use – or what arrangements are in place for monitoring compliance with safety requirements. Any such materials should be clearly presented, making effective use of illustrations and diagrams to explain the concepts if appropriate.
- □ Plans for testing and rehearsing crisis communication.

During the Crisis

Keep listening . . .

“The questions being asked at the media centre and over the helplines provided a wealth of information about whether and how the information put out by the incident management team had been heard and understood, illustrating the importance of constant listening for feedback to verify receipt and understanding of outward communication, and to tailor future messages.”

[observation on nuclear emergency exercise, crisis communication case study]

Even if the obvious communication duty is for you to issue information, it is extremely important to listen for any feedback. This will enable you to check how your messages have been received and acted on, and help you to adapt and develop your communications both to meet audience needs and as the situation develops.

In terms of WHAT to communicate, remember to:

- □ let people know what they need to or can do for themselves to assure their own protection;
- □ keep messages simple, straightforward and brief;
- □ respect and address people’s urgent concerns and requests for information;
- □ avoid speculation or guesses; stick to facts.

In terms of HOW to communicate, remember:

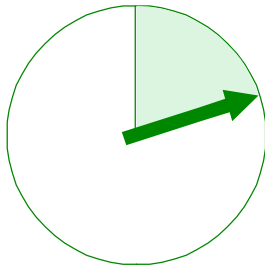
- □ frankness and honesty are always the best policy; be yourself and be human
- □ behave as though you recognise the importance of communication, not as though communication is diverting you from more important matters
- □ ECCB (empathy, concern, commitment, benefit – see page 15 above)

Remember that people’s trust in what you say will be heavily influenced by HOW you say it. If your manner switches them off, they may never hear WHAT you say.

Section 6

A Five Minute Guide for Speaking about Risk Issues

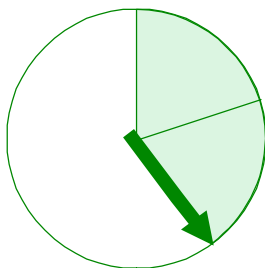
Finally, a very condensed “5 minute guide” is provided for the harassed manager who has just been given five minutes’ notice of the need to speak in public about an important risk issue. This is NOT intended to imply that 5 minutes is all the preparation necessary, or that 5 minutes of preparation can replace thorough, professional training and rehearsal of communication skills – the aim is to highlight some key pointers and reminders.



MINUTE 1

Situation and Audience

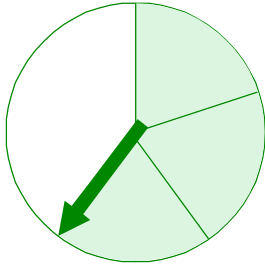
- Think through your target audience(s) and what they currently know/think about the issue.
- Clarify your objective: what should the audience know or think after your explanation/meeting/interview?



MINUTE 2

HOW you come across

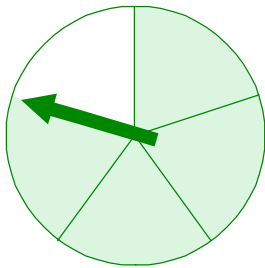
- Be yourself: be comfortable, confident, frank and honest throughout. Don't be afraid to show some humanity and emotion.
- Think of the encounter as an opportunity to explain the issue and help people make up their minds about it, not as a terrifying ordeal.
- Be committed and sincere – you've probably devoted a large part of your life to issues like this. Show how much you care by your manner and language.
- Be attentive and responsive to what others have to say. Respect people's views and beliefs, however “wrong” you think they are. Your motivation is to help them understand the issue and decide what's in their best interests – not to smash them in an argument.



MINUTE 3

WHAT you Say

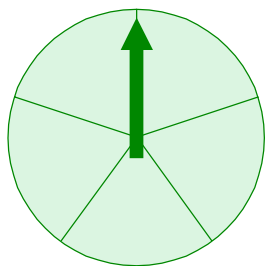
- □ Decide the key message you want to get across to help meet your objectives. Explain it as you would to friends, who you'd hate to patronise, but who know nothing about the issue at all.
- □ Practice your message out loud a few times and get it as brief as possible. If you're going to be recorded and edited, try to make your key point in a single breath, and make it frequently.
- □ If you can, relate the issue to your personal experience or position as a citizen - so the audience will know you EMPATHISE with them on it.
- □ Demonstrate your competence and commitment to address the issue and the audience's concerns - give them hard evidence that you have taken, and are taking, it seriously.
- □ Stress how you devised your approach or recommendations in the best interests of your audience (emphasise BENEFITS - in terms with which they'll identify).



MINUTE 4

Dealing with Difficult Questions and Emotive Counter-Arguments

- □ Stay calm and positive - DON'T let yourself get defensive or aggressive, DO repeat simply and clearly how your policy and approach are devised to ensure the best results for people.
- □ Use every question and challenge as an opportunity to demonstrate that you respect other people's concerns and beliefs - show that your motivation is to help, not to score points.



MINUTE 5

Final Moments

- □ Relax and make yourself comfortable, take a few deep breaths, and focus on your key messages.
1. HSE, *Risk Communication - Benchmarking in Government*, ILGRA Report, available from HSE (address inside front cover).
 2. Department of Health, *Communicating about Risks to Public Health - Pointers to Good Practice*, Department of Health 1997.

Section 7

References

Further Reading

The literature available on risk communication is vast and growing rapidly - a search carried out as part of the preparation for this Guide revealed over 1000 English language publications over the past ten years. For a short, readable overview of the topic highlighting some of the most important factors, see for example:

Morgan M.G., *Risk Analysis and Management*, Scientific American, July 1993.

A number of manuals and guides have been produced in the USA; some of the most relevant for regulatory departments and agencies are:

Lundgren R.E., *Risk Communication, A Handbook for Communicating Environmental, Safety, and Health Risks*, Battelle Press, ISBN 0-935470-76-X, 1994

Government National Research Council, *Improving Risk Communication*, 1989, National Academy Press, ISBN 0-309-03943-6, and

Covello V. et al (ed), *Effective Risk Communication - The Role and Responsibility of Government and Non-Government Organisations*, 1989, Plenum Press, NY.

For an overview of how people respond to risk, see for example reference 2 above, and

Slovic P., *Perception of risk*, Science, 1987, Vol. 236

Fischhoff B., *Risk perception and communication unplugged: Twenty years of process*, Risk Analysis, 1995, Vol. 15(2)

Kasperson R.E., Renn O., Slovic P., Brown H.S. et al, *The social amplification of risk: a conceptual framework*, Risk Analysis, 1988, Vol. 8(2).

Risk Analysis, the journal of the Society for Risk Analysis, is the principal journal for publications in this field, and can be relied upon for a regular update on relevant and topical issues.