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Dear Minister,

The Science and Technology Select Committee

I am writing to you, in my capacity as Chairman of the House of Lords Science and Technology Select Committee, following the Committee's recent follow-up activity to its July 2011 report, *Behaviour Change*. The Committee thank you very much for coming and giving oral evidence to us as we followed up on our 2011 report.

At the outset, it should be stressed that the Committee welcome the Government's efforts to make more effective use of the behavioural sciences in designing public policy and in evaluating outcomes following policy interventions. We appreciate, as you told us in the evidence session on 24 June, that we are "in the foothills of trying to evaluate the effectiveness of any government action," and that you recognise there is more work to be done. It is with this in mind that we make the following observations.

The work of the Behavioural Insights Team (BIT) is to be commended. In particular, we are impressed by their work in pioneering the use of Randomised Controlled Trials to determine the effectiveness of interventions. It appears that BIT's interventions have seen considerable success – indeed we were supplied with supplementary evidence providing examples as diverse as tax collection and organ donation. We have some concerns, however, that robust evaluation data is not always available in the public domain to substantiate such claims. In addition, we would emphasise the importance of publishing information on approaches which have not worked, as well as successes. BIT has not published an annual report since its 2011/2012 update, and this did not contain sufficient data to enable independent assessment of the success of BIT's work. We would encourage BIT to return to its practice of publishing annual reports, and to ensure that sufficient information is made available about successful and unsuccessful interventions to allow independent evaluation of methods and findings. We would also encourage BIT to explore whether it would be possible to conduct longitudinal evaluations of some interventions which it has already implemented because the effectiveness of some approaches may diminish over time, and new approaches may be required to maintain desired outcomes.

In regard to the work of Government on behaviour change more broadly, we very much welcome assertions from yourself and from BIT that non-regulatory levers are not necessarily to be seen as an alternative to regulation, but rather that both should be considered as options for eliciting behaviour change and may be used in combination. We also agree that changing behaviour in complex areas may take a substantial amount of time. We are concerned, however, that in some areas there is undue emphasis on the use of non-regulatory approaches and that there are not always clear review points for evaluating

policies and making decisions on whether to continue with a particular intervention or to adopt an alternative approach. During our inquiry and our follow-up evidence sessions, we focused on two case studies where complex behaviour change at the population level will be required to achieve the Government's stated outcomes: obesity and modal transport shift. Whilst recognising that the Department of Health (DH) and the Department for Transport (DfT) have responsibilities for policy in these areas, we would like to highlight our concerns about approaches to the design and evaluation of behaviour change interventions, based on these two cases.

In 2011 we emphasised that obesity was a significant and urgent societal problem and that if effective measures could not be achieved through voluntary agreement the Government should pursue them through other means. In our recent evidence sessions we heard that there was a tension between 'health and wealth creation' and we remain very concerned that the Public Health Responsibility Deal is too slow in delivering change and that there is no clear point for reviewing the effectiveness of this voluntary approach. Equally, we are concerned about the evaluation of the Change4Life programme. The effectiveness of the programme has been questioned in peer reviewed literature. Although DH defended the programme, there is currently no information in the public domain to substantiate this and the supplementary evidence we received contained data on outputs, but not on outcomes. We were concerned to learn that no review date has been set for this strategy. Given the magnitude of the problem, it is particularly important that behaviour change policies are effectively evaluated and the Government makes the best use of available evidence. We would urge the Department to set clear and measurable outcomes by which it will assess the success of its policies in this area at different time points, and to make the data underlying these openly available.

We acknowledge that there will be occasions when it is legitimate for a government not to implement behaviour change interventions for which there is good evidence of effectiveness. However, we were concerned to learn during the course of our follow-up inquiry that although the National Institute for Health and Care Excellence unequivocally recommended a minimum price per unit of alcohol in its 2010 guidance, no action has been taken to implement this. In this regard, we reiterate our 2011 recommendation that: "We agree with the principle, stated in the Government's Principles of Scientific Advice, that ministers should explain publicly their reasons for policy decisions, particularly when a decision is not consistent with scientific advice and, in doing so, should accurately represent the evidence." In these circumstances, however, we believe that ministers have a responsibility to explain why they have decided not to do so.

With respect to reducing car use, in 2011 we welcomed the principle of the DfT's Local Sustainable Transport Fund (LSTF). During our follow-up activity, we heard evidence that it has funded 96 projects. We are pleased that due consideration appears to have been given as to how best to monitor and evaluate these projects, given that no two are same. However, we are aware that there are some concerns that requiring Local Authorities to bid for small pots of central funding via the LSTF may not be conducive to good long-term planning for transport and the built environment. We reiterate our 2011 recommendations that significant changes in behaviour will require both strong disincentives to car use and good public infrastructure to enable other "smarter choices" measures. Given this, we would urge the Department to ensure that further evaluation of the LSTF is able to capture appropriately the medium and long-term impact of the individual investments, and the relative overall impact of 'soft' versus 'hard' measures on reducing car use. The outcomes from this could be used to inform future discussions around funding streams for sustainable

travel. We also consider it essential that clear mechanisms are in place to build the evidence base and share best practice between Local Authorities.

We of course appreciate that you are not responsible for the DH or the DfT, but, as the Minister for Government Policy in the Cabinet Office championing the behaviour change agenda, we would hope that you could ensure that the points we raise above in relation to our two case studies are widely disseminated across the whole of Government.

In relation to the evidence base for Government policy more broadly, in 2011 we recommended that: “the Government appoint a Chief Social Scientist who reports to the Government Chief Scientific Adviser and is an independent expert in social science research to ensure the provision of robust and independent social scientific advice.” On 24 June, you suggested that this role is currently being filled, in effect, by Dr David Halpern (currently Director of the Behavioural Insights Team and What Works National Adviser.) If this is the case, it would be useful to provide the community of behavioural and social scientists outside of Government with some clarity on this matter so as to enable effective interactions.

In addition, you noted that the development of the What Works Centres was significant and that they would begin the process of systematically keeping track of whether Government policies achieve the outcomes that its authors intend it to achieve. We would welcome clarity as to what proportion of the work of the Centres is likely to be spent directly evaluating or advising central Government on how to evaluate its own policies, and how much will be directed towards the synthesis, translation and communication of existing research evidence from all sources in a particular policy area to enable local decision-makers to make decisions informed by the best available evidence.

Should you like to discuss this letter with me, please do not hesitate to get in touch. I am copying this letter to the Parliamentary Under Secretary of State for Public Health, Jane Ellison MP, and the Minister of State for Transport, Baroness Kramer. This letter will be posted on the Committee’s website in the normal way.

Yours sincerely,

LORD SELBORNE

Chairman of the House of Lords Science and Technology Select Committee

Rt Hon Oliver Letwin MP,
Minister for Government Policy and Chancellor of the Duchy of Lancaster,
Cabinet Office