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Paper 117: Introducing the Citizens' POLIS: A New Approach to Online Citizen Participation in Political Decision-Making



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## Abstract

Recently, arguments for the extension of citizen participation into decision-making processes have become a vogue within political discourses. Governments in a number of countries, including the UK, have stated the need for new processes of inclusion to be explored practically. Such statements are rooted in social science theory, and it can be argued that social scientists *should* play a central role in experimenting with new methods of implementing citizen participation. At the same time, the rise of e-democracy has suggested new means and new media across which participation can occur. This paper discusses one such participation experiment – the *Citizens' POLIS (Participatory On-Line Interactive System)*. The Citizens' POLIS is a multi-phase, multi-method, hypermedia participation process. This working paper seeks to introduce the general methodological assumptions and practical features of the Citizens' POLIS, on which the author's empirical research, currently in progress, is based.

## Keywords

Citizen participation; electronic democracy; decision-making; hypermedia; deliberation

The administration of the Ancient Athenian polis (city-state) was founded on the conviction that all inhabitants, or *citizens*, should play an active role in its political life. administration, it has been suggested, 'came as near as any community ever has to achieving the democratic ideal of government by the people themselves, through citizen participation, rather than by the modern substitutes of representation or delegation' (Arblaster 1994: 19). In the twenty-first century, social scientists have made a strong case in favour of a system of political decision-making which, in part at least, resembles the Athenian model (Gibbons et al 1994). Advocates of participatory democracy argue that decisions would be both more legitimate and more effective if citizens were to be given a more active role in their production. More specifically, theories of deliberative democracy argue that political decisions are only legitimate if they are the product of free, open and reasoned discussion between citizens (Dryzek 1990; Cohen 1997; Bohman 1998). Governments, despite acknowledging these arguments have generally been slow to act on them (Irwin 2001). In some countries however, there are signs that this is set to change. In the UK for example, the need for greater participation has been noted at the highest level (House of Lords 2000). Prime Minister Gordon Brown has stated that his government will practice 'a new type of politics ... built on engaging with people, not excluding them' and that politics has the capacity for making change happen when 'we involve people who are rarely involved beyond the opportunity to cast a vote at elections'. In order to realise the potential of the public to make better policies, Brown has proposed a series of 'citizens' juries' which, it is claimed, will address 'specific problems' and establish 'concrete proposals for change' (Brown 2007).

However, in spite of a government commitment to putting citizen participation into practice, two significant and related problems remain. Firstly, as social scientists have noted, there are limitations and drawbacks to citizen participation exercises being government-led and enacted from the 'top-down' (Hagendijk and Irwin 2006). Secondly, because traditional citizen participation methods are very expensive to carry out, there are severe practical obstacles to NGOs or citizens' groups who wish to enact their own public participation methods from the 'bottom-up'. Above all, for both parties, as well as for the independent social scientist, the costs of conducting a face-to-face participation exercise often prove to be prohibitive. A solution to these problems may lie in using online communication technologies as 'tools for participation'. The concept of 'electronic (e-) democracy' has been the subject of heavy debate; debate which has largely centred on how democracy can be effect*ed* in an online environment, and indeed whether this constitutes effect*ive* democracy. Within this, operationalising methods for online (or e-) participation has proved particularly challenging (Rowe and Gammack 2004).

The author's current research, from which this working paper is taken, aims to address such issues. It aims to provide empirical research on citizen participation by an independent social scientist – the results of which will be published in the near future, upon completion of the project. Also, it aims to introduce a process by which citizen participation can be efficiently and effectively operationalised in an online environment. This process is called the Citizens' Participatory On-Line Interactive System (Citizens' POLIS) and is a multi-phase, multi-method and hypermedia participation exercise. The remainder of this paper serves to offer a general introduction to the methodological assumptions and a description of the practical features of the Citizens' POLIS.

#### The Citizens' POLIS Method

The Citizens' POLIS as a method for e-participation is greatly influenced by the citizens' jury (Jefferson Center 2004). Conceptually, the purpose, rules and structure of engagement are comparable – with the obvious difference being the media across which participation takes

place. The Citizens' POLIS, like the citizens' jury, can be broken down and explained according to the different stages or processes that constitute it. Before the POLIS itself commences, a great deal of preparation must go into the organisation of the system. This preparation can be divided into three basic stages: *Recruiting the Citizen's Panel, Setting the Agenda* and *Producing the Evidence*. When preparation is complete, the deliberative proceedings begin, and these may be divided into two basic stages: *Presenting the Evidence* and *Staging the Deliberation*. The remainder of this paper will discuss individually and in more detail what each of these processes entail. It serves therefore as a general introduction and overview of the Citizens POLIS. Before doing so however, it may first be useful to address the issue of who exactly should organise the POLIS and why.

## A Note on the Organisation of the Citizens' POLIS

The Citizens' POLIS is an adaptable approach to citizen participation which could be organised and implemented by government- or NGO-employed research staff. Also, it could be a convenient and practical template tool for bottom-up or 'DIY' citizen participation (e.g. PEALS 2004). Ultimately, the level of citizen control in the organisation of the Citizens' POLIS will largely depend on the theoretical orientation of those who initiate the system or indeed those who fund it. Whilst there is much theoretical weight behind the argument that, from a democratic point of view, citizens should be given as much control as possible (carte blanche even) over the organisation of an exercise in which they take part (Webler 1995; Pickard 1998; Irwin and Hagendijk 2006), in practice, it is questionable as to how feasible this is (Burgess et al 2007). With notable exceptions aside (PEALS 2004), 'bottom-up' citizen participation has proved to be easier said than done, since compared to theoretical support, rather less empirical work has shown how this could be achieved practically (Mort, Harrison and Dowswell 1999: 103). Conversely, there have been a number of problems identified in those participation exercises which are organised 'top-down' by government authorities. Largely, concern is directed towards the fact e-government initiatives, since they are 'always affected by the interests of those in power' (Dahlberg 2001a), and are likely to impose 'narrow', 'pre-existing' frames and constraints on the exercise (Grove-White 2001; Irwin 2001; Hagendijk and Irwin, 2006).

Due to these twin problems, it can be argued that the social scientist is best (or at least better) placed to play a central organising role in organising participation initiatives. As such, although the Citizens' POLIS can, in practice, be organised both 'from below' by citizens themselves, or 'from above' by government authorities, ideally, it *should* be organised by the social scientist. Social scientists are ideal for this role because they expert in the study of social interaction (Jasanoff 2003), are usually well informed about the substantive area of interest (e.g. debates over climate change, GMOs or mobile phone radiation), but do not have as direct (and instrumental) a stake in the proceedings of the exercise as might those working for or in government. Whilst few social scientists would ever purport to complete objectivity, given that their involvement in the issue itself is only indirect, and given that reflexivity is increasingly a requisite praxis within social research, it is possible to argue that they are better placed to organise the deliberative procedure fairly.

#### *i.* Recruiting the Citizens' Panel (Sampling)

Citizens' juries usually take it as given that the participating citizens should be recruited through random-stratified sampling. This method of sampling divides the defined population (of a town, country etc) into quotas, using a set of pre-determined criteria, before employing a market research or survey company to select random individuals from within these quotas.

Usually, common demographic categories, such as gender, ethnicity, age and educational status are used. However, this process is expensive and is concerned primarily with the attempt to achieve representativeness. It is certainly not essential for a citizens' jury, a Citizens' POLIS or any other method of public participation to use this method. Smith and Wales (2000: 57) have suggested that random-stratified sampling can 'undermine the democratic ideal of the inclusive jury [or related participation exercise]'. The question of whether a citizen participation exercise should appeal to representativeness is grounded in wider questions related to methodology, and wider still, to epistemology. In other words, the researcher's sampling strategy (or their absence of one) relates to whether they believe that the methods used can allow for generalisations to be made between a sample and the population from which it is drawn, and indeed, whether we should even categorise society in terms of a number of fixed and homogenous groups or categories (such as ethnicity or employment status etc). Recruitment of citizens in the POLIS is amenable to a variety sampling techniques, and thus the choice of method will depend largely on the researcher's epistemological orientation, s well as on the usual practical concerns of time and cost.

#### *ii.* Setting the Agenda

One of the most important elements in the organisation of any participation experiments is the setting of the agenda. There are seen to be a number of ways through which an agenda can be set. The steering groups used by traditional citizens' juries usually set the agenda based on their collective technical knowledge of the issue. There are however, questions concerning whether the agenda is fair and balanced, given that this would, at least partly, depend on the composition of the steering group -i.e. what type of experts are used, from what stakeholder groups they are drawn, and indeed whether all stakeholder views are represented. In line with the normative claim above – that it is the social scientist who is organising the POLIS, then it is s/he who is to be responsible for setting the agenda. This prompts the question of how might this be done in practice. The answer is that the agenda simply emerges inductively through the research process itself. Through the kind of foundational or 'background' research upon which every research project is based, the social scientist becomes familiar with his or her field, and with the salient themes, positions and arguments within it. Usually, a social research project begins by sketching the socio-cultural environment of the phenomenon under study. Such a sketching can be used to help set the provisional agenda of a Citizens' POLIS. By reviewing the literature on, or speaking to key actors in, a particular field, the social scientist can derive an overview of the issue at stake, including the main themes, positions and arguments which characterise it. Given that social scientists are, as suggested above, less 'involved' in the substantive issue per se, it is presumed that an agenda set by them will be derived from a review of the literature which is (as) impartial and rounded (as is possible), and which takes into account all the relevant viewpoints on that issue.

It is important to note however (as indicated by the use of italics above), that the agenda in a Citizens' POLIS is at all times provisional – that is, it is constantly subject to modification or amendment. Changes to the agenda can be made by the social scientist during the subsequent gathering of evidence. Also, the Citizens' POLIS should allow room for the citizens themselves to challenge the agenda during the course of deliberation. As they become more familiar with the issue(s) at stake, citizens become increasingly positioned to determine what is more or less relevant and important. Building an element of flexibility into the POLIS caters for the inherent unpredictability of the processes of knowledge production and social interaction which are characteristic of all deliberative exercises. Assumptions, understandings and knowledge of a subject can, and most often will, change dramatically

during the course of data collection and analysis. Indeed, the inductive generation of new theories is the epistemological premise upon which most qualitative social research is based. As such, setting a deliberative agenda that is composed of rigid and immutable categories (or topics) before the data analysis and collection has taken place is contrary to good qualitative social research practice. In the Citizens' POLIS therefore, the agenda can, and in many cases will, be adjusted (to varying degrees) following the first phase of system. Horlick-Jones et al (2007) have referred to this property – where one stage of engagement can inform and shape the next stage – as the 'translation quality' of an exercise. The need for flexibility is something which is also advocated by the founders of the citizens' jury method (Jefferson Center 2004). Ultimately, allowing citizens a share in the direction of deliberation confers a greater degree of democratic legitimacy.

#### *iii. Producing the Evidence (Evidence Content)*

Once the provisional agenda has been set, the social scientist must produce evidence related to this agenda which s/he will then present to the citizens' panel. The content of this evidence in essence, is social science data. The methods by which this data is collected can vary between different POLISs, but basically they are those which are used in qualitative social research in general. In the citizens' jury, evidence usually takes the form of expert 'testimony'. So, experts are either interviewed in front of the panel by an independent third party (or they might be cross-interviewed by two protagonists, analogous to the crossexamination of evidence in a legal jury), or they are asked to give a straight presentation about their knowledge or experience. In addition to expert testimony, evidence can also be gathered from a variety of documents - print and audio-visual (AV). As such, we might see the methods by which evidence is produced for the citizens' jury as being comparable to those which are used in social research more generally – interviews, narratives and document analysis (including AV analysis) for example. However, some considerations need to be made for the Citizens' POLIS, because it takes place in an online environment and the evidence must therefore be presented electronically. In particular this affects the form that interview or narrative data takes (see section iv. below). However, despite the means of evidence presentation being very different, it is arguable that the means of evidence production are largely the same in the Citizens' POLIS as in the citizens' jury. The former, like the latter, relies largely on interview and narrative data, with relevant documents being used to supplement this data. Interview and narrative data could take one (or more) of the following forms: print, audio or audio-visual (i.e. the interview could be transcribed, audiotaped or video-recorded). The choice of which form is to be used in the POLIS is at the discretion of the social scientist, and this is discussed in more detail in the following section. Other methods of collecting data may be considered however, and this also is ultimately at the discretion of the social scientist, and may depend on the specific issue at stake. In this respect, choices related to evidence production in the Citizens POLIS are comparable to the choices which are to be made in all social research projects. However, where the Citizens' POLIS (and citizen participation exercises in general), differ(s) from more conventional social research, is that, in the latter the researcher's analysis of the data is usually the primary focus, whilst in the former the citizens' analysis of expert evidence is the primary focus. However, how raw data becomes 'expert evidence' is a process in itself, and in this process the social scientist plays a central role.

Converting raw data into workable evidence via an editing process is necessary because it enhances the efficiency of participation. Although it might be argued that, ideally, it is preferable to ensure that the data is subject to as little moderation or editing as possible, in practice, this is quite infeasible. For instance, it could scarcely be assumed that citizens -

particularly where their participation is voluntary (but even where they are paid a moderate honorarium) - would be prepared to read through hundreds of pages of documents or interview transcripts, listen to hours of audio files or watch hours of video footage. In the Citizens' POLIS, as in any piece of social research, it is likely that initial data collection leaves the social scientist with a 'surplus' of data – some of which is sufficiently tangential to the specific issue under inquiry so as to be considered irrelevant to the purposes of that particular piece of research. Thus the social scientist organising a Citizens' POLIS, like any social scientist, must analyse their data, decide what is relevant and what is not to the purpose(s) of their particular project and 'prune' or edit their data accordingly. Lengthy narratives, interview transcripts, audio interviews, video interviews and documents must all be edited significantly so as to ensure that the work being asked of the citizens' panel is commensurate with the remuneration (or lack thereof) which they are receiving for their participation. Whilst from a purely democratic perspective, we could argue that the citizens themselves should be allowed, and have the ability to, decide for themselves what is relevant or not, again this is infeasible because of the time and commitment required to do so. In taking this role, the social scientist allows the citizens to focus on a narrower set of data, which they can then analyse and discuss in more depth. Here it is possible to re-invoke the argument that the social scientist is better placed to choose and edit data - i.e. to produce evidence – for the citizens, than is the government official. This again, is because the former has a more independent and less 'involved' status than the latter. This relative neutrality allows for the social scientist to account for all the relevant views and positions in a given debate, so that the citizens can make an informed decision and not be influenced by a weighting of the evidence in favour of a particular position. This has been a criticism of many a government-led participation exercise (e.g. Irwin 2006; Hagendijk and Irwin 2006). However, despite the relative neutrality of the social scientist, it is important that additional steps are taken to ensure that editorial bias is as minimal as possible. The most straightforward way of doing so, is to send any edited data back to its author (e.g. to the interviewee) so that they can read, hear or view it, and decide whether it is still satisfactorily representative of their viewpoint(s). Any comments can then be sent back to the social scientist, who can amend the edited version accordingly (by re-inserting or substituting data extracts for example). This process can be repeated until both the social scientist and the interviewee/document author are both satisfied with a final piece of 'expert evidence'.

#### *iv. Presenting the Evidence (Evidence Format)*

For the Citizens' POLIS to make full use of the technology available to it – and to eparticipation and e-democracy more generally – then a *hypermedia* approach is preferable. This argument is influenced by the work of Dicks et al (2005; 2006) on multimodal epistemology and hypermedia methodology. If we are to agree with Dicks et al that combining different media within a hypermedia environment can produce a richer and fuller representation of the complex and multi-dimensional nature of social interaction then we can argue that doing so for a citizens' participation exercise can enhance the quality of that exercise. If different media can have different meanings, and if combining these media together in a hypermedia environment can produce still other meanings, then the citizens themselves are arguably cable of producing richer, fuller understandings of the evidence in this way, than were they to be presented with it across a single media, or across multiple but disparate media.

The Citizens' POLIS then, presents and links together the different forms of data – interview, narrative, document and audio-visual –via a *hypermedia system*. The obvious way of doing so practically, is through the use of a designated website, which would enable the

various sources of expert evidence to be linked together to the same location. For example, if the social scientist has largely produced evidence by conducting interviews and editing the interview transcripts, then the edited version of the transcript can be either copied onto a webpage of that website, or be saved in a text file and linked to it. Similarly, if the interview is either in audio or video format, then the relevant file - mp3 or wmp for example – can be embedded in, or linked to, that website. Also images could be used, if desired, again by being copied into or linked to the relevant webpage. The use of hypermedia as a tool for citizen participation offers the social scientist numerous options for presenting and connecting their evidence across a variety of media. We might refer to the hypermedia system as being a 'participatory space'. The advantage of linking the evidence to a single participatory space is that it can maximise participatory efficiency. It is possible of course to present the evidence in other ways – for example by sending it via email attachment or CD/DVD. This however, is less efficient and less interactive than the use of hypermedia.

One consideration however, is that whilst the Citizens' POLIS must rely on remote means of evidence presentation, it should be noted that it would not be impossible for some evidence – namely audio-visual interviews or narratives - to be conducted online in real-time. The use of videoconferencing groupware for example, could allow citizens to see and hear the experts present or be interviewed live. This would allow the citizens to also take into account their responses to live, on-the-spot questioning. Whilst some might suggest that videoconferencing would be the best means of conducting an online participation exercise, (because it is more resonant still of face-to-face interaction) this may not be the case for a number of reasons. Firstly, from a practical point of view, this is more difficult to organise and use and is more expensive to implement.<sup>1</sup> Secondly, it would require those experts participating to consent to being identified by the citizens' panel.<sup>2</sup> Thirdly, as suggested above, there are some advantages to be had from being able to combine as many media as possible in a hypermedia environment and not to rely simply on one multimedia method of presentation.<sup>3</sup> Finally, (non-videoconference) electronic message-based interaction can be seen to have a positive effect on the content of deliberation, in so far the anonymity conferred by this medium of deliberation can encourage the deliberants to be more open, vocal and candid than they might otherwise have been (Stewart and Williams 2005).

#### v. Staging the Deliberation

In the Citizens' POLIS, deliberation can take place both asynchronously and synchronously. Asynchronous interaction takes place via a 'discussion forum' (or 'discussion board'). This is where users 'post' messages at a given point in time, which can then be received by other users at a future point in time (depending on when they next visit that discussion forum). These can be readily obtained from the internet, either at a small cost or free of charge, and can be linked to, or 'embedded' into, the host website. Synchronous interaction takes place when two or more (or twelve in the present context) users can exchange messages as a

<sup>&</sup>lt;sup>1</sup> Live presentation, unlike a prior interview with the social scientist, would require the citizens *and* the experts to be available at certain times, instead of simply requiring the citizens' panel to be available at certain times. It is even more unrealistic where compensation for loss of earnings or honoraria either cannot be offered, or can only be offered in moderation.

<sup>&</sup>lt;sup>2</sup> More often than not in social science research guaranteeing participants anonymity is an imperative ethical requirement, and is frequently key to securing participants' consent.

<sup>&</sup>lt;sup>3</sup> Of course, we can still link or embed *pre-recorded* AV interviews/presentations to a hypermedia system – and this can allow for non-verbal forms of communication (e.g. expression, body language) to be taken into account. It should however be considered *one* amongst a number of ways of presenting evidence.

collective group in real-time, as they type their corresponding messages into their computers. So, one user can type and send a message, which is immediately received by other users, who can then, should they chose to, send an immediate response. One way to operationalise this in the Citizens' POLIS is for the researcher to make use of existing Instant Messaging (IM) clients which are popular (particularly amongst younger members of the public), free to download and very straightforward to use. Another way to achieve synchronous interaction is via the use of a designated 'chat room', which again can be obtained freely or cheaply from the internet, and which can be linked to, or embedded into, the host website.<sup>4</sup>

Whilst it is possible to conduct the whole deliberative exercise across a message forum - indeed the majority of online deliberative fora are asynchronous (Wright 2006) there would be some drawbacks in doing so. There is a growing body of research on the use of online focus groups in social research which compares the relative advantages and disadvantages of synchronous and asynchronous versions of this method (Murray 1997; Mann and Stewart 2000; Rezabek 2000; Franklin and Lowry 2001; Stewart and Williams 2005). The general conclusion is that synchronous online interaction is more resonant of face-to-face interaction than asynchronous forms, and as such is more akin to 'real' deliberation. Synchronous interaction allows us to reproduce the heightened sense of immediacy and group dynamics of face-to-face interaction (Stewart and Williams, 2005: 405). This is desirable if we are to see openness and cooperation as being key characteristics of deliberation (Bohman 1999). The immediacy of synchronous interaction can facilitate a more 'shared' (i.e. cooperative) electronic environment than can asynchronous interaction, and the former arguably encourages participants to be less individualist and more reactive and candid than in the latter. Also, IM clients often include in them a feature which tells the other users that a given user is sending a message. In this way, synchronous online communication can resemble the 'turn-taking' characteristic of face-to-face interaction. In such a way, it is possible for group discussion to proceed in both an immediate and an orderly fashion. In the Citizens' POLIS then, the bulk of deliberation would ideally take place synchronously. The length and structure of the synchronous interaction however, will depend largely on the scope of the agenda and the breadth of the issue(s) in question. For instance, a very broad issue, like the ethics of genetic modification would arguably warrant more time for deliberation than a narrower issue, like those related to local town or city planning. The former for instance, might only require a one-off, hour long deliberation session, whilst the latter might require a series of related but separate hour long deliberation sessions, each of which focuses on a particular sub-issue. Each synchronous deliberation session would need to be scheduled to ensure that all participants are online at a given time. However, asynchronous interaction also has a place in the Citizens' POLIS primarily as a means to foster citizen input into the process itself. For instance, a discussion board could allow the citizens to post questions which could then be answered by the experts (either directly or via the researcher), or to make ad hoc suggestions regarding the agenda and how it might be changed. Moreover, it could act as a medium by which people could voice general thoughts and opinions which they felt could not wait until the next scheduled synchronous discussion (or which they felt could inform it). Asynchronous interaction can also act as a good counterpoint to the immediacy characteristic of synchronous interaction, since the former is generally seen to be more 'considered' (Stewart and Williams, 2005) than the latter. Using a combination of synchronous and asynchronous interaction allows deliberation in the Citizens' POLIS to be cooperative, instinctive, open and considered.

<sup>&</sup>lt;sup>4</sup> It should be noted also, that most discussion forums offer have a security option, which can allow the creator (i.e. the researcher) to control who can access them.

#### Conclusion

The aim of this working paper has been a simple one – to introduce a new method for online citizen participation. The Citizens' POLIS is an experimental approach to participation, which sees the independent social scientist to play a key role in the design, organisation and implementation of the exercise. It also advocates the need for structure in such exercises, and as such participation is divided into five main stages (or processes): recruiting the citizens' panel, setting the agenda, producing the evidence, presenting the evidence and staging the deliberation. At the same time, an inherent flexibility is built into the Citizens' POLIS so that ultimately the citizens, as well having their say on the substantive issue itself, can also help to determine the terms of their deliberation (they can have their say over how they say what they say – so to speak!). The Citizens' POLIS then, despite its structure being fairly prescriptive, is above all committed to producing a practical and effective approach to participation, within which theories of electronic and deliberative democracy can be reconciled. In the author's opinion, the above processes and features are seen to be the most practical and effective by which to operationalise electronic deliberative democracy, particularly set against the background of the imperatives of time and cost which constrain all social research projects. However, it is fair to assume that some other researchers may take issue with this, and believe that there are more practical and more effective ways to do so. However, as has been seen above, there is a considerable degree of flexibility built in to the Citizens' POLIS approach from the sampling strategies through to the specific media used for presentation and the character of interaction used of deliberation. As such, the Citizens' POLIS is more an approach than a procedure - it is a set of indicative methodological tools and not a set of dogmatic rules of engagement. Its commitment is precisely to the fact that it is intended to be a practical approach to participation and not one that aspires to theoretical ideals. Often, the aspiration to such ideals serves only to problematise the operationalisation of the theories upon which they are based, resulting in a theoretical-empirical stalemate. The relation of the Citizens' POLIS to democratic theory will be expounded elsewhere, and it must be reiterated that the aim of this working paper has been merely to introduce the Citizens' POLIS in its general, hypothetical form.

This is then, a working paper in the true sense of the term. The Citizens' POLIS approach is still one which is undergoing - and which will continue to undergo - considerable development and modification. As such, it is hoped that this paper will elicit a fair amount of comment and critique, and that this will serve to aid the development of this new approach to online participation.

#### Postscript: A Citizens' POLIS on Mobile Phones, Risk and Health

The author wishes to note that the first Citizens' POLIS – on the issue of 'Mobile Phones, Risk and Health' is currently underway, and will be published in the near future, following its completion. This empirical research will no doubt give greater clarity to the approach, and will serve to elucidate many of the methodological features and practical processes discussed in more hypothetical terms above.

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