Who's at stake?

Power and stakeholders in UK tech policy

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Contents

Executive summary

This report is the result of the *Who's at Stake? Power and Stakeholders in UK Tech Policy* project at Solent University. We present findings into the role of the term stakeholder in policy documents, and how they entrench or exclude from power in decision-making processes that affect everyone but not equally.

The project focused on comparing how the term stakeholder was reflected in policy outcomes. Who was given the role of stakeholder? What does that role mean, what power or influence does it bestow? Whose views actually contributed to policy? These questions guided our framing in the way that certain language can create or exclude from power by shaping roles and norms. We identified different ways that stakeholder could be used to give, remove or conceal power.

The method included an analysis of 194 tech policy documents, created by UK government departments and bodies from 2017-2023. The breadth of documents shows the increase in scale of activity surrounding tech policy, from central government strategy to specific areas such as health, business and defence, as well as to standards within the public sector or the needs of particular groups such as children. There was also an increase in cross-departmental documents, showing the intersection of related areas and the need to develop strategy and policy in a more cohesive and comprehensive way.

Our findings showed that stakeholder is used more often than not, and mostly in a generic way without specifying exactly who is a stakeholder. When used to describe past engagement, it obscures who has been able
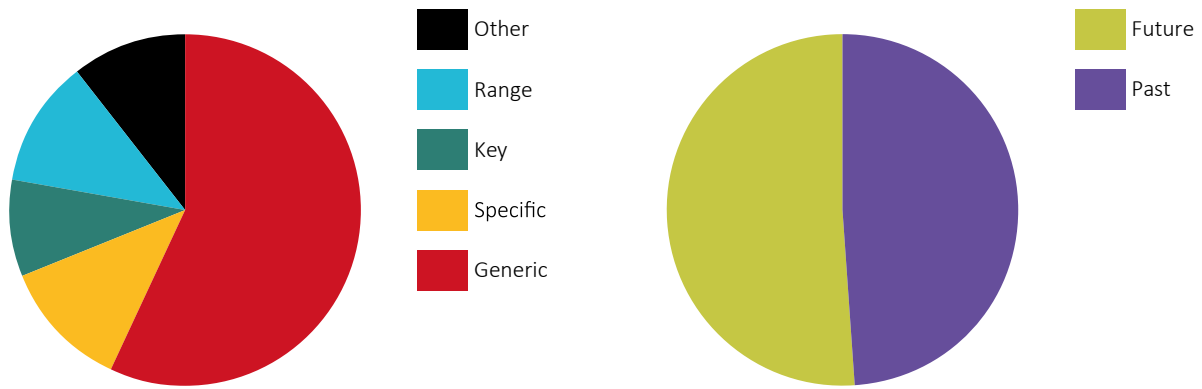
% usage of stakeholder, by type and by time

to exert influence over the policy process, raising questions around the standard process of consultation. When used to describe future engagement, the vagueness conceals a lack of real commitment to taking broader interests into account.

The same documents were also assessed for their citational practices, to get a better view of whose voices are actually shaping policy outcomes. This showed a huge dominance of government sources, raising issues of circular policy-making processes that exclude external or alternative perspectives. This insular approach to policy-making increased over time, which suggests the setting of long-term strategies carries risks of entrenching a specific set of priorities and failing to adapt to social and technological changes. There were, however, a few key documents that showed moments of wider enagement.

A workshop with government, civil society and academia delved into different perspectives on what a stakeholder is. It covered issues such as consultation processes and whether stakeholder is a tool to describe power or a way of giving it to those who need it. Discussion also covered the range of innovative engagement and policy practices being explored across sectors, providing a view of how tech policy could be done differently.
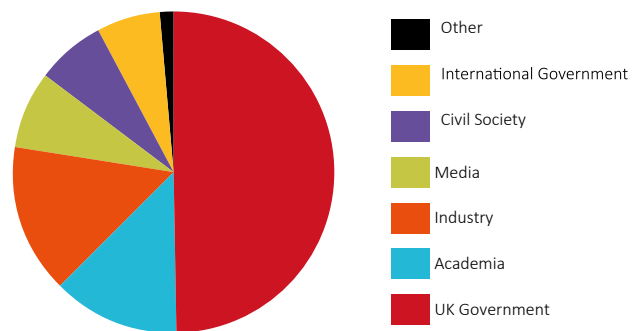
% citations by source type

As a result of this research, we offer six recommendations. The first three are aimed specifically at government, while the second three are also for those outside government:

1 Stop saying "stakeholder"

Be more specific to improve transparency and accountability, and identify where processes need changing.

2 Representation not consultation

It is not enough to consult as a tick box exercise unless you are meaningfully representing the interests and needs of those affected.

3 Make policy more flexible

There are lots of ways (many mentioned in this report) of engaging different groups in different parts of the policy process, and there should be space to revise strategy in implementation.

4 Identify key moments for intervention

There are a few major documents that shape policy. Being aware of these and making the process more representative will improve policy down the line.

5 Be a mediator and representative

Use positions of infleunce to include and elevate the voices of those excluded.

6 Be a gateway not a gatekeeper

Use privilege to open doors rather than protecting and entrenching reputation and influence.

These recommendations are offered as first steps in reimagining tech policy and the tech policy process. A radical overhaul is needed to make sure marginalised and vulnerable groups can be heard and can meaningfully engage to create change. This is a change in process, a change in priorities and a change in discourse. A first step is to shift the stakeholder from those who have a stake to those who are at stake.

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Acknowledgements

Introduction

Tech policy in the UK has been undergoing a rapid increase in activity and prominence in recent years. Following the adoption of the European General Data Protection Regulation in 2016, and in the context of UK law diverging after its departure from the EU, there has been a flurry of proposed regulations. The UK has raced to lead the world in tackling the escalating harms of technologies while promoting its values and interests. This has led to a wealth of documents: policy proposals, consultations, guidance, codes and others. These have been created by departments and regulators from across government, from DCMS and BEIS to the Central Digital and Data Office and the National Audit Office, the ICO and OfCom, and the Children's Commissioner, among many others, including an increase in cross-departmental collaborations. And yet, amongst the complexities, conflicts,

and changing figures (5 Prime Ministers and 10 Ministers overseeing digital policy, plus numerous other influential politicians and civil servants), the UK has so far not succeeded in establishing a comprehensive suite of enacted legislation to deal with the issues of data, AI, platforms, skills and related issues.

In part, the difficulties are due to the sheer breadth of social and technical problems to consider when attempting to manage the sprawling mess that tech policy needs to deal with. But it is also due to the different interests of different groups with interests at stake in the debates. This issue of stakeholders in important. Many documents claim to consider or represent the interests of "wide-ranging stakeholders", or to consult with stakeholders. But what exactly does "stakeholder" mean? Despite

who is consulted, whose interests actually follow through to influence policy? Who counts as a stakeholder in different facets of tech policy? Is stakeholder used to represent ideals or the interests of those whose lives are at stake? Who has a stake in the benefits, the harms, the decisions?

The project is based on the following key questions:

- How widely is the term "stakeholder" employed in UK tech policy?
- Whose views are actually represented in policy documents?
- How does this differ between technology areas, issues, or departments?
- What does the use of the term stakeholder create, conceal or exclude?
- What other terms and practices are people using that might better represent groups often left out?

The analysis and framing is centred around the academic theory of performativity. Building on the work of Judith Butler, [1]applied in previous work to the roles and norms of privacy,[2] we begin from the idea that speech and naming can create certain identities and power structures when people take on (or are forced to take on) certain roles. We used Sara Ahmed's idea of nonperformativity,[3] where terms like inclusion are used to hide their opposite, to the exclusion of marginalised groups. We also considered Eve Kosofsky Sedgwick's concept of periperformativity,[4] to understand how the ways we talk about these practices can shape wider understandings and set the stage for future developments.

Within the tech policy sphere, Josephine Wolff[5] showed how within Internet governance there is not only a vast difference between stakeholders' views, aims and preferred policy outcomes, but a wide variation in how these different groups understand some of the underlying concepts and terms. If we consider asymmetric power dynamics, then this in turn shapes discourses and agendas that define what questions are being asked, and who can ask them.

Furthering discussions of power, José van Dijck, David Nieborg and Thomas Poell highlight the ways that platform regulation

1   Butler, J. (1988). Performative acts and gender constitution: An essay in phenomenology and feminist theory. Theatre journal, 40(4), 519-531. Butler, J. (2015). Notes toward a performative theory of assembly. harvard university Press.
2   Benjamin, G. (2020). From protecting to performing privacy. The Journal of Sociotechnical Critique, 1(1), 1.

3   Ahmed, S. (2006). The nonperformativity of antiracism. Meridians, 7(1), 104-126.
4   Sedgwick, E. K. (2003). Touching feeling: Affect, pedagogy, performativity. Duke University Press.
5   Wolff, J. (2016). What we talk about when we talk about cybersecurity: security in internet governance debates. Internet Policy Review, 5(3).

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concerns those with a financial stake as well as a non-financial stake.[6] Existing regulatory frameworks, however, are ill-suited to thinking beyond financial terms, and a stake tends to fall back on market-driven priorities that falsely assume users and citizens are customers. They also tend to place the burden of proof onto marginalised individuals,[7] rather than taking into account systemic issues and harms that are not easily countable. In the increasing overlap of platforms, data and AI, and their embedding as technical and social infrastructure, we can add consideration of issues of dependence and vulnerability when defining who has a stake in policy decisions.

Power, discourse and the structures of the policy-making process combine in ways that more often than not entrench existing privilege and marginalisation. Today's counterpublics take to tools outside conventional politics, like social media activism[8] or combined media and direct protest,[9] to give voice to marginalised experiences of technology.

While digital media has broadened the scope of political participation, it often does little to affect the hidden and exclusive processes through which concrete policy is made. A lack of accessibility and accountability, as well as a more general waning of trust in traditional institutions of power has led to increasing mistrust. This mistrust in turn tends to lead not to activism and participation but to political disengagement.[10] Such disengagement becomes part of a a self-perpetuating exclusion of those not already involved in the policy-making process.

In such a situation, even the political power of mistrust has been defanged.[11] Without the ability to meaningfully voice mistrust, which is an essentail part of the balance of power in democratic deliberation, policy-makers turn to quantifiable forms of legitimacy such as market share and adoption rates. This only furthers the wider exclusion of different publics and marginalised groups.

Digital citizenship requires new skills for critically engaging with technologies, for participating in new ways with tech

6   Van Dijck, J., Nieborg, D., & Poell, T. (2019). Reframing platform power. Internet Policy Review, 8(2), 1-18.
7   Smuha, N. A. (2021). Beyond the individual: governing AI's societal harm. Internet Policy Review, 10(3).
8   Jackson, S. J., Bailey, M., & Welles, B. F. (2020). #HashtagActivism: Networks of race and gender justice. Mit Press.
9   Benjamin, G. (2022). #FuckTheAlgorithm: algorithmic imaginaries and political resistance. ACM FAccT'22, 46-57.

10   Zuckerman, E. (2021). Mistrust: Why losing faith in institutions provides the tools to transform them. WW Norton & Company.
11   Benjamin, G. (2023). Mistrust Issues: How technology discourses quantify, extract and legitimise inequality. Bristol University Press.

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policy.[12] Otherwise, only the powerful are able to set the agenda, to decide which questions to ask and which problems to tackle. But we can imagine different processes. There is still scope to invert power asymmetries and develop policy by and for the marginalised and the vulnerable.

Is policy-making only for those already holding a stake in power and process? Or can it be reconfigured for those whose lives are at stake in the outcomes of tech policy?

Across these theories and perspectives, we were interested in how the term stakeholder might be used in different ways to privilege different groups in the decision-making process, to analyse what power dynamics it creates and to answer our core question of who is at stake in UK tech policy. This informed our methods and the recommendations we present based on our findings, workshop and analysis.

Outline

In this report we examined 194 documents of UK tech policy to uncover how widely the term stakeholder is used. We examined the different ways the term is used and what that means for who has a stake in decision-making. We looked beneath the rhetoric
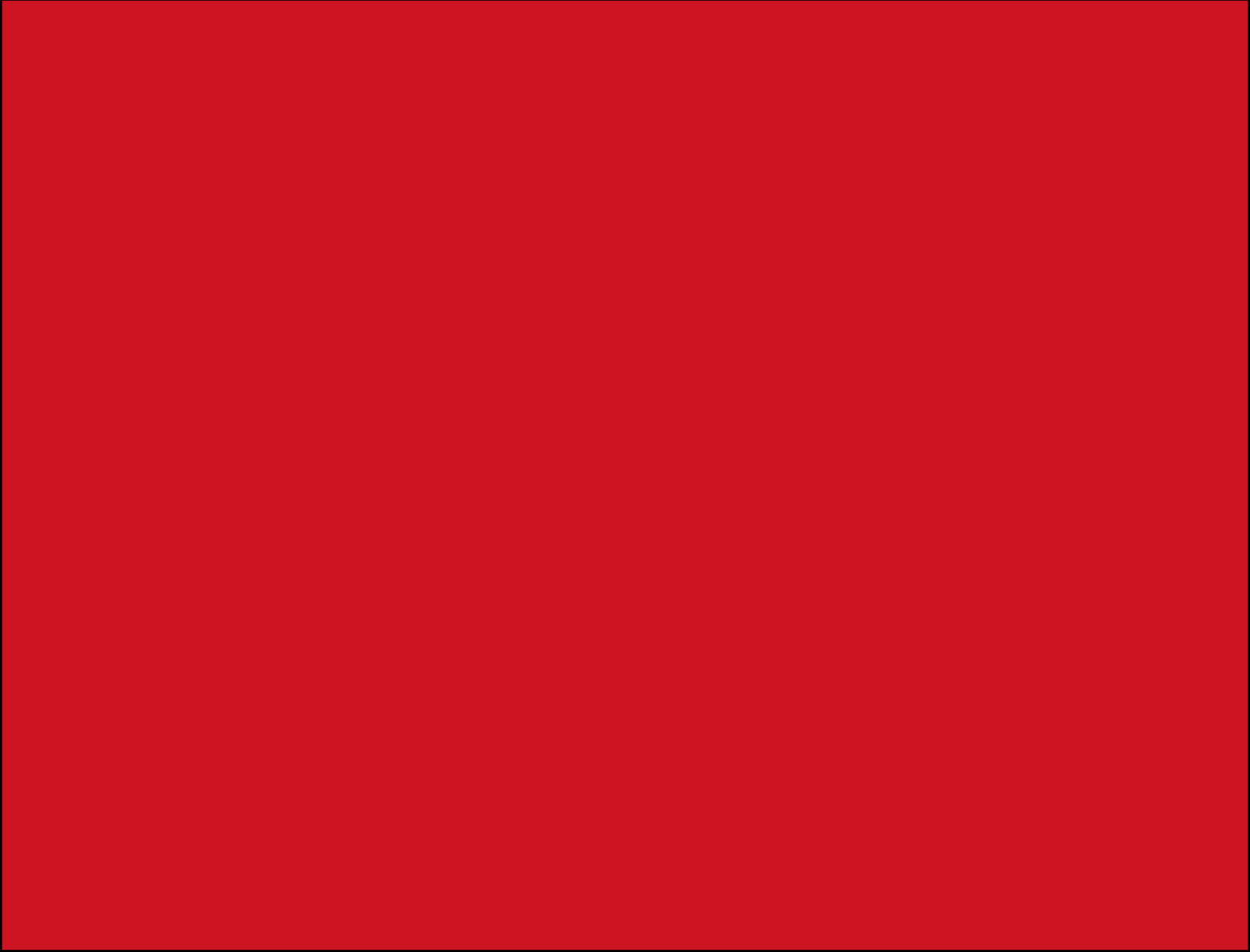
of consultation to see what sources get cited in the final presentation of policies, and by extension whose interests are really represented. We held a workshop with government, academia and civil society to learn what stakeholder means to different groups and processes, and to discuss better practices for representing those who do not have a direct line to consultation, or who are consulted without being represented.

The report sets out our method of selecting suitable policy documents, collecting data, and analysing the results, as well as describing the workshop. Our findings are presented according to the use of stakeholder and the citational practices in the documents. Then the results of the workshop are discussed and the broader findings contextualised. Finally, we present recommendations for government and for those outside government, to improve representation and power distribution in UK tech policy.

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12   Carmi, E. & Yates, S. (2023). Data Citizenship: Data Literacies to Challenge Power Imbalance Between Society and "Big Tech". International Journal of Communication 17, 3619–3637.

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Method

The study used a mixed method approach, including gathering quantitative and qualitative data from policy documents, workshops with government, civil society and academia, and analysis of the uses and functions of the term stakeholder emerging from these different sources.

Policy documents

First, a list of relevant policy documents was generated. This began using an inductive approach, starting with the UK Digital Strategy and looking at the other reports cited there. This in turn led to others, both directly (through citation) and indirectly (through 'further reading' and 'related topics' sections on government websites as well as other sources such as the OECD. AI policy dashboard or social media). This approach continued to cast a wider net

and gain an inclusive perspective on the breadth of the UK tech policy landscape.

The time range for documents was from 2017 to the present. This was to include a span of the ~5 years starting after the agreement of the EU GDPR which instigated a rapid increase in the scope and number of technology policy initiatives in the UK. The range therefore represents a current 'era' in tech policy. The key aim when

adding a particular document was to include a range of reports, policy and guidance documents that demonstrated how different voices and perspectives were involved in influencing the design or implementation of policy. Documents selected for inclusion generally focused on the key policy areas of data, AI and platforms, but also spanned wider issues in technology policy such as media literacy, as well as other documents not entirely focused on policy but relying heavily on technology for outcomes (such as Levelling Up and Industrial strategies).

To remove extraneous documents, a number of requirements were put in place for inclusion in the final set. The primary of these was being hosted by a government department, regulator or similar (i.e. from a .gov.uk, .ico.org.uk, .ofcom.org. uk domain or similar). Some of these documents were excluded on the grounds that they were, for example, commissioned surveys by media companies that simply presented results without further analysis. Consultation reports and Parliamentary committee session reports were excluded. This established a general principle of excluding those which functioned more as a catalogue of 'witnesses' (although this term itself raises interesting questions). Instead, the focus was on those which demonstrate whose voice is being represented and counted in final policies as 'stakeholder'. This was due to the presentation of external responses without directly influencing policy outcomes. Similarly, literature reviews

and case studies were excluded as they too were more focused on presenting a state of opinions than synthesising a recommendation, strategy, judgement or application of policy or an issue of consideration for tech policy-makers.

These processes led us to a set of 194 documents from a range of government departments and bodies. They were categorised under data, AI, platforms and other, and further labelled with a core topic. These topics included functional topics such as strategy and standards, as well as application areas such as children, business, health, defence and other areas. Other information such as authoring departments, url and year of publication were added. The documents were then analysed to generate specific data.

The first point of data collected was a simple yes/no on whether the term stakeholder was mentioned within the document. If the term was present, then at this point, initial qualitative observations were added on how the term was used.

Further qualitative data was gathered on how the term stakeholder was used. This included particular phrasings, which types of entities it referred to (or which it was placed in comparison to), and other relevant observations on the use of the term. Our observations led us to develop several categories of the main uses of stakeholder:

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Specific stakeholders or groups of stakeholders (including, for example, "industry stakeholders"). This is usually the naming of a particular group with an existing interest and influence.

"Key" stakeholders or similar, including "relevant" or "important" stakeholders. While these uses may be combined with other specific groups, the main use of them assumes knowledge of who counts as a key stakeholder, potentially closing off alternative voices. This produces power by passing judgement on the validity of a group's interest or influence.

A "range of" stakeholders, including "diverse", "wide ranging" and "diverse range of" stakeholders. This use invokes an appeal to widening participation without further specifics, often in order to justify the discursive process.

"Other" stakeholders is also used. This becomes an exclusive catch-all, acknowledging that some groups will have an interest but not knowing or daring to mention them specifically.

Finally, the *generic "stakeholders"* term is used without further clarification. This is often used to conceal identities when referring to specific consultations, or follows the 'range' and 'other' categories in a non-specific way. In any case, it is often employed to generate legitimacy for the process (and those already involved

in it) without committing to give power or influence to any specific group.

The entries were grouped and counted according to these different use types emerging from the data. The categories revealed the different positioning of a generic term "stakeholders" in relation to other, more specifically identified groups. For example, stakeholders might be placed alongside regulators, industry, experts or even the general public. Examining the use of the term in this way reveals the role and assumed identities of the stakeholder, and its function as a catch-all "other" group in comparison to the identified roles who have a more active position in influencing decision-making.

An additional dimension of counting the use of stakeholders was undertaken in reference to the process of engaging with stakeholders. This appeared either as part of developing the policy document or as an instruction or commitment for future work (by the same department or by the intended audience such as industry). To investigate this, separate from the use categories we counted where these uses had a temporal dimension of past or future engagement.

Alongisde the uses of the word stakeholders, we also had questions about which voices made it into the final policy documents. Who is tacitly defined as having a stake in terms of direct influence, representation and acknowledgment in policy processes?

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The entries were assessed for the references and links cited. The citations in each report were counted under different categories of stakeholders:

- UK government
- Academia
- Industry
- Media
- Civil Society
- Government (other)
- Other

UK government included all government departments, regulators and other bodies. Government (other) included governmental organisations from other countries, as well as supranational entities such as the EU, UN, OECD, WHO and related organisations. Where a reference list was absent from the document, individual links or citations were examined instead. Close repeats (on the same page or in the same small section) were discounted but repeat references across different sections of a document (as they inform different aspects of policy) were included.

We performed a series of different analyses on the data. Some quantitative methods such as regression analysis were used to identify and test trends, although other than comparing standard deviation to the number of sources by type, this generated few meaningful connections (though some are mentioned in our findings). Numbers of references by type were considered, but given the large disparity between different types of documents, with references ranging from zero to several hundred, we focused on relative percentage distribution of references between sources and between types of use of the term stakeholder.

We compared these numbers by different categories such as authorship, area of technology or policy area to provide greater insights. Filtering and ranking the document list in this way allowed us to identify and analyse different trends and patterns in terms of representation as well as to focus qualitative analysis. The more meaningful insights came from qualitatively examining the numbers in the context of who authored the reports and the nature of the reports. This allowed us to make observations of important points of comparison along specific categories of inquiry.

These strands of data collection and analysis formed a basis from which to generate findings on the use of the term stakeholder in practice, and compare this often broad term with whose voices are actually being referenced or represented in policy documents. The full document list and associated data can be found in the Appendix.
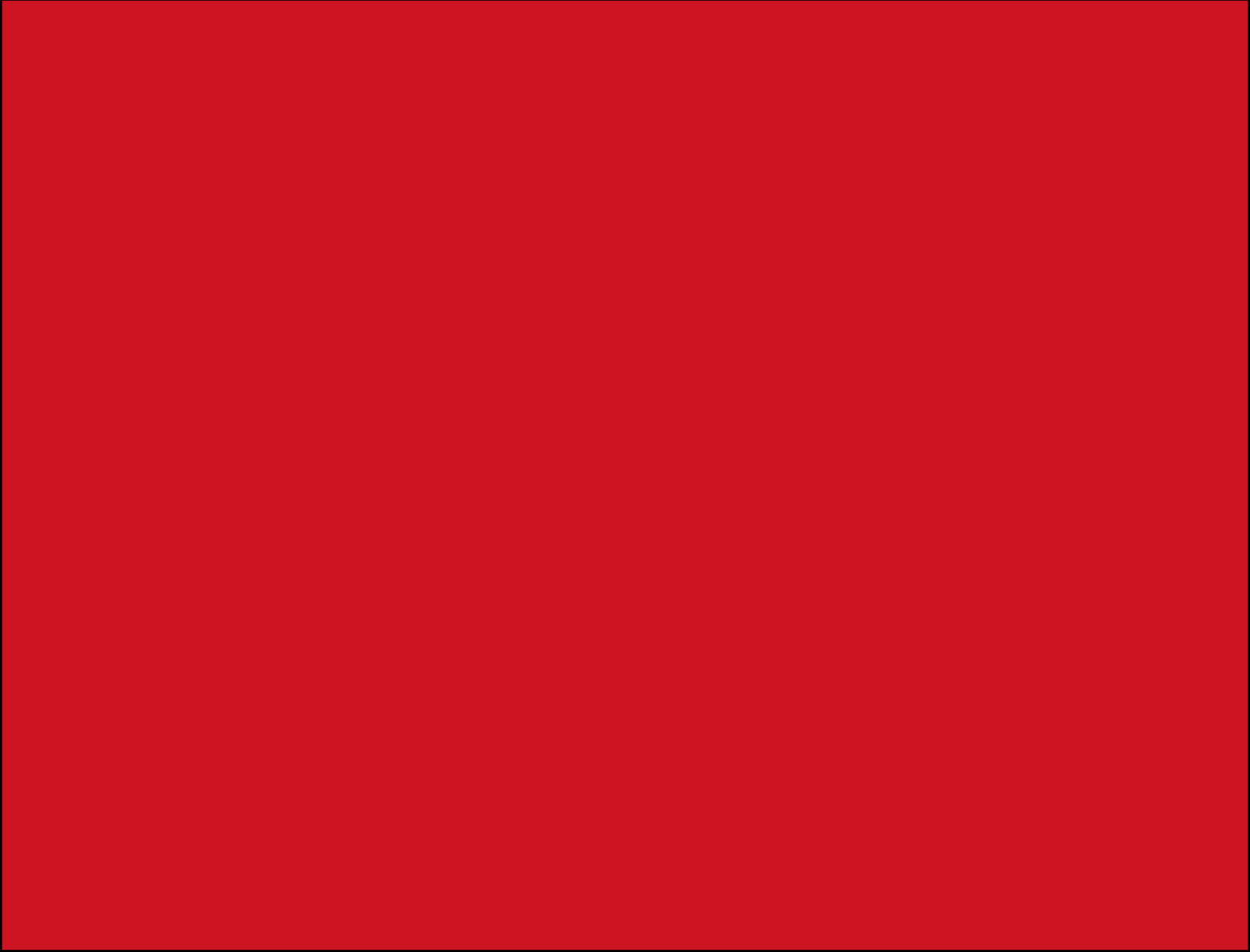
Workshop

An additional set of methods were used in the online workshop. Hosted by Solent University on 1 March 2023, the virtual event included invitees from specific organisations and sectors relevant to the development and critique of tech policy in the UK. A list of those individuals and organisations who agreed to be mentioned can be found in the Acknowledgements, but attendees were distributed across government, civil society and academia. Discussions were conducted under the Chatham House Rule (comments made in the workshop can be freely used but must remain unattributed), though this framework itself formed part of the topic for debate to acknowledge its potential for concealing who is influencing policy recommendations.

The workshop programme covered two key themes. Firstly, we discussed the participants' perspectives on the role, function and use of stakeholders as a term in developing policy. This included debating the validity of the term, what it conceals or enables, who it might empower or preclude, and how this fits into the broader issue of representation in policy, particularly of minoritised groups. The second theme was best practices of engaging with a wider range of people and groups. This included how different stakeholders are identified, ways of making the policy process accessible, and creative methods of including different voices in the development of policy. Participants responded with their own examples and other examples of innovative practices they had encountered, as well as a broader discussion on the benefits and limits of different policy processes.

Workshop discussion notes, online chat and online collaboration board were reviewed thematically and to identify additional key points stemming from the wide-ranging discussion. The themes and issues raised informed how we approached the analysis of the documents data and guided the production of recommendations concerning the processes of tech policy in the UK. These recommendations are based on the collection of our mixed methods and findings, expanding on the core questions with which we set out.

Findings

Policy documents

Of the 194 reports analysed, these were weighted towards more recent years., showing the increase in interest and activity around tech policy over time. The number of reports that made it into the dataset increased over time, showing the rapid rise in interest and activity in tech policy. There were 43 different organisations who sole-authored reports, rising to 52 including co-authoring.

Authors ranged from major government departments such as DCMS, with direct legislative remit over technology policy, to a range of specific regulators, offices and other bodies. These may have a more specific remit over a particular aspect of tech policy, such as the UK Council for Internet Safety, the National Data Guardian,

the Office for AI, the Geospatial Commission or NCSC, or they may cover a different area that has overlap with issues in technology, such as the Race Disparity Unit, Children's Commissioner, Committee on Standards in Public Life, or devolved governments.
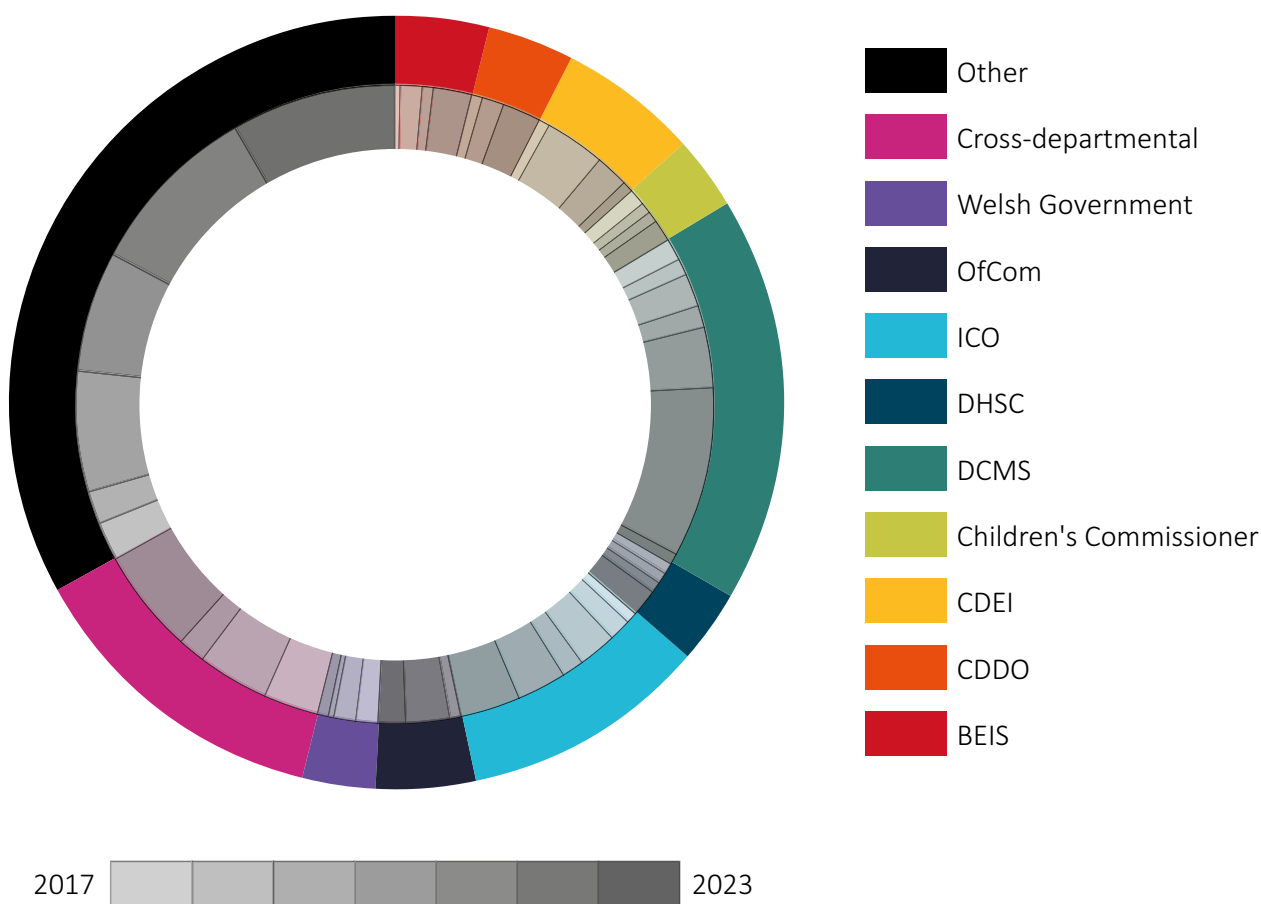
Documents analysed, by year
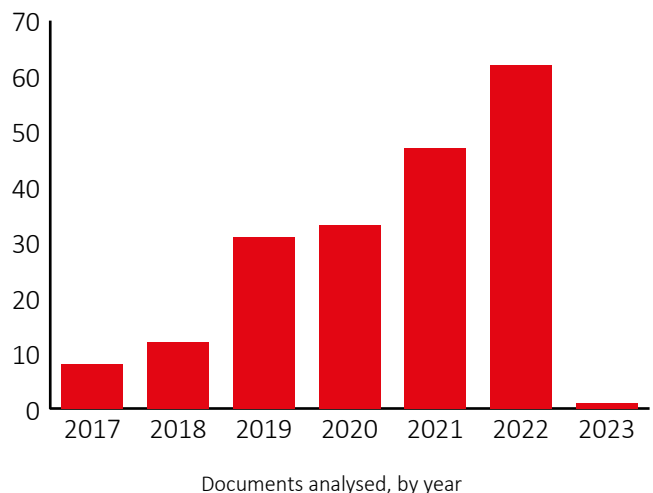
The most prominent author of reports was DCMS, with 33 sole authored reports, followed by the ICO (20) and CDEI (11, though notably a part of DCMS). BEIS, The Cabinet Office (and particularly its Central Digital and Data Office), OfCom, The Children's Commissioner, and NHS/DHSC also featured in a number of reports.
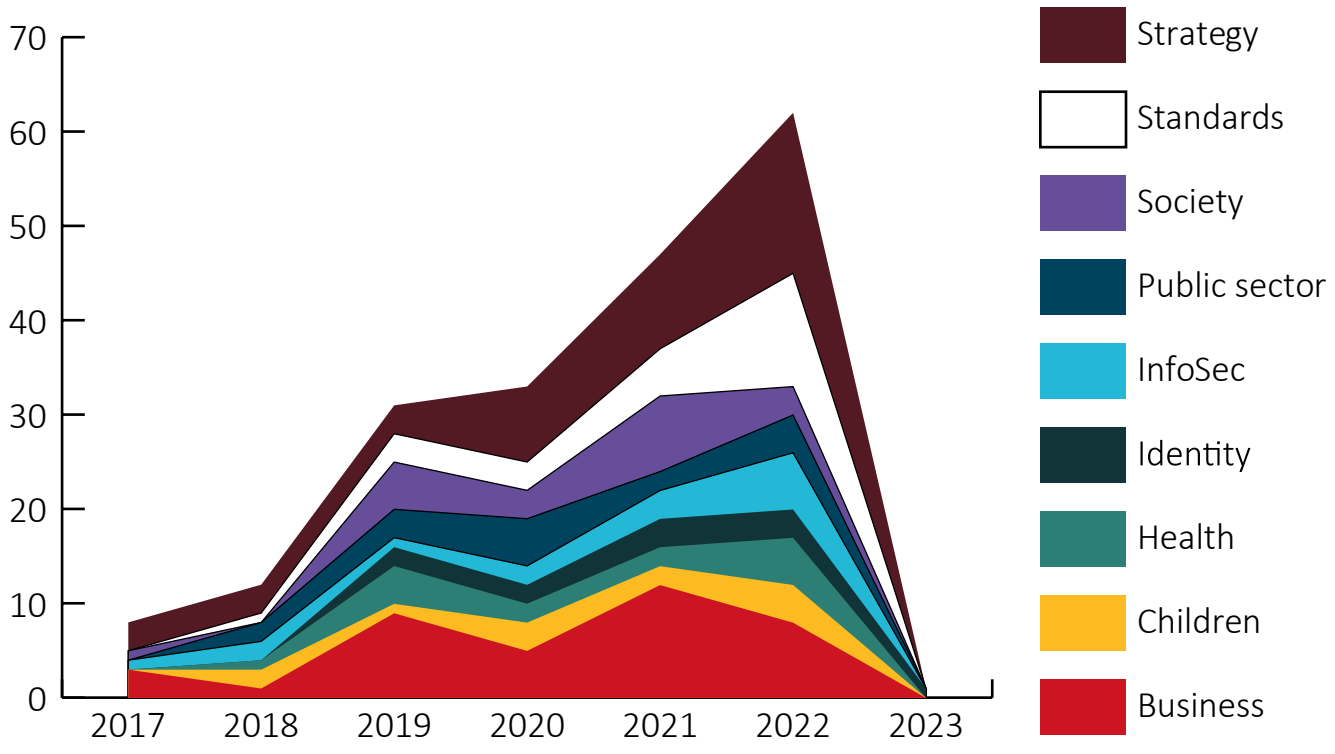
25 reports were cross-departmental. These were either: collaborations between major departments, for example the three reports co-authored between DCMS and BEIS; bodies working on related areas,

like DHSC working with NHS England and BEIS working with OfGem and InnovateUK; or a department working with a more specific body, such as the Cabinet Office operating in a facilitating role working variously with the Geospatial Commission, Scottish Government and others.

Note, the number of organisations counts sub-bodies separately, like NHS, NHSX, NHS Digital and NHS England, as they each give a particular voice, focus and framing to policy, and will each have different strategic and operational stakeholders.

Legend:
- Other
- Cross-departmental
- Welsh Government
- OfCom
- ICO
- DHSC
- DCMS
- Children's Commissioner
- CDEI
- CDDO
- BEIS

2017 — 2023

Documents by author, and by year

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Documents by category per year
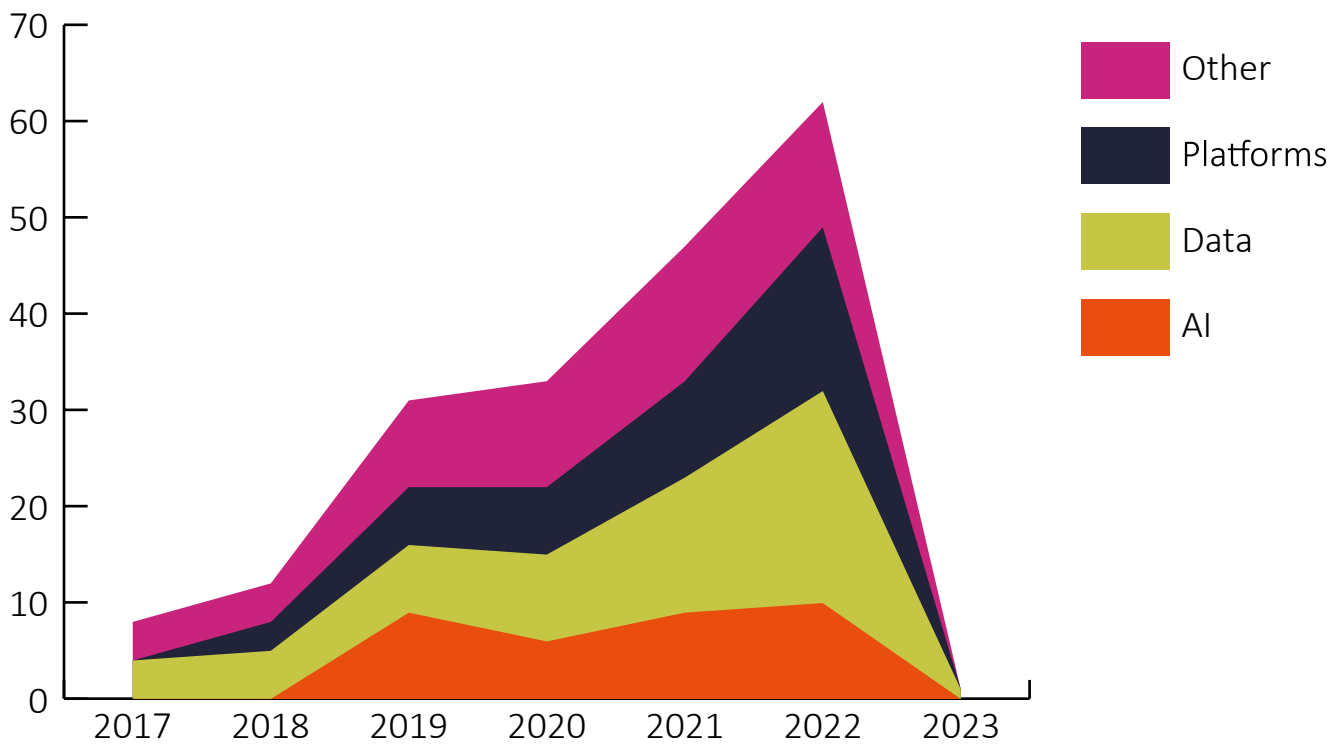
Documents by category per year

The long tail of organisations working on tech policy shows the breadth and scale of the issues faced, the dominance of technology as solutions that need to be integrated into existing policy programmes, and the escalating interest in applying overarching strategy to specific operational areas.

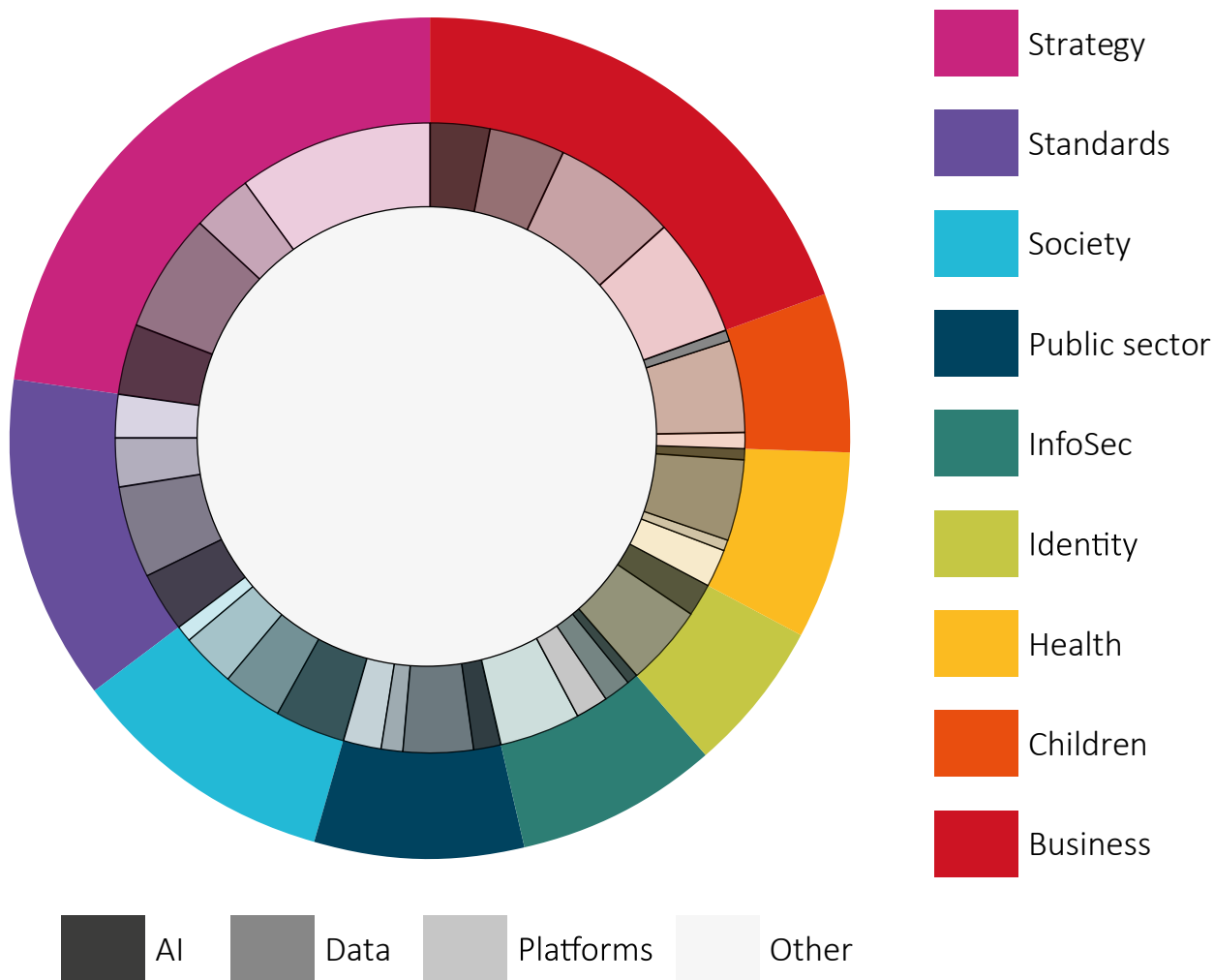The dataset showed a priority of strategy documents as well as those related to business (including finance). This demonstrates that the UK is still in an agenda-setting stage across various technologies and areas of government. Societal issues and standards were next in prominence, showing increased attention on the risks to different groups as well as the need to establish best practices. Other categories identified were specific application areas (such as health), sub-section of technologies (InfoSec or Identity, including biometrics), or were concerned with a particular vulnerable group (children).


Legend:
- Strategy
- Standards
- Society
- Public sector
- InfoSec
- Identity
- Health
- Children
- Business

- AI
- Data
- Platforms
- Other

Documents by category and technology type

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Stakeholder

140 out of the 194 documents used the term 'stakeholder', at a reasonably consistent rate relative to the total number of documents per year. Of those mentioning stakeholders, the number of uses ranged from one or two to over two hundred (in a government response to a consultation). The average number of mentions remained less stable, with peaks in 2019 and 2022.
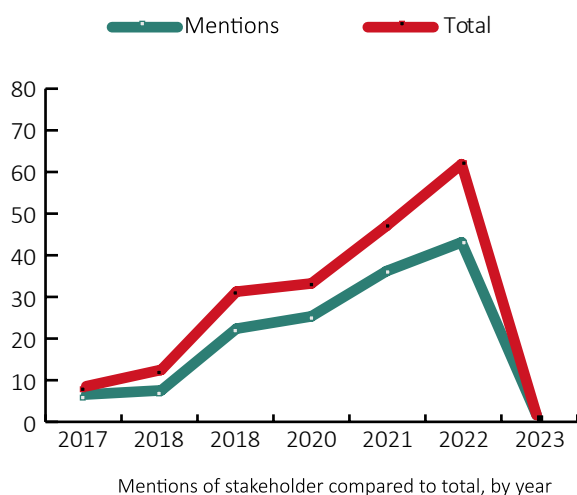
Mentions of stakeholder compared to total, by year
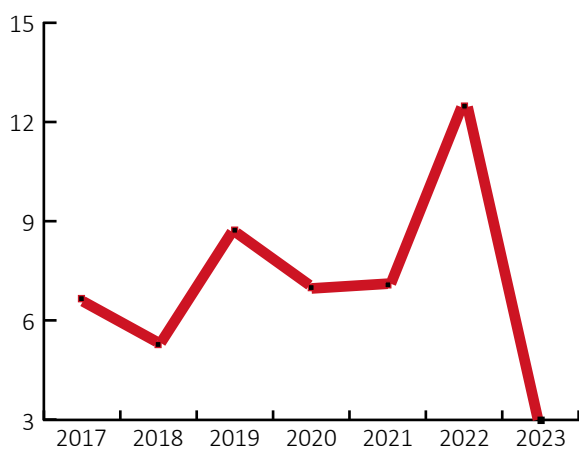
Average # mentions of stakeholder, by year
(of those documents mentioning stakeholders)

70% made reference to stakeholders in past engagement, while 80% referred to them as part of future plans (for themselves or others). Slightly under half these documents mentioned specific types of stakeholders (46%), while there were also common references to "other stakeholders" (47%), "key" or "relevant" stakeholders (41%) and "diverse" or "a range of" stakeholders (39%). The generic use of "stakeholders" without any qualifier was more dominant, being used by 81% of the documents who mentioned stakeholders at all. Total number of uses places the generic use significantly higher, at 703 compared to between 109 and 146 for more qualified uses, while past and future were more even at 543 and 562 respectively.

Documents with the highest use were mostly responses to consultations, however these were dominated by generic uses of the term, not specifying who or even what type of stakeholder was being referenced. This speaks to a problem of opacity within the policy-making process, concealing influence and not validating representation within current consultation mechanisms.

The generic use of the term stakeholder is non-performative. It is used in an empty way that does little to create a specific role or power for the unspecified 'stakeholder'. Meanwhile, it continues to perform and obscure the power of those already involved or those whose opinions already align with the political agenda of the government shaping the policy process.

The highest use of specific stakeholders was in relation to economic topics. This demonstrates the performative power of the stakeholder as having a financial stake, falling back on traditional definitions of stakes, ownership and influence. Money is still power in tech policy.

Other higher uses were one report on health, plus multiple on online platforms, in which the usage tends to specify the platforms themselves. Again this performs the role of having a stake as an existing role of power, interest and influence. If identified, or 'key', stakeholders are only those who are already able to exert a great deal of control over how they themselves are regulated, then it also non-performatively excludes those affected by the issues and policy decisions.

The few organisations who never made any reference to stakeholders were those with only one or two reports in the dataset. Of the vast majority who did refer to stakeholders in some way, most referred to them many times over. Some documents, such as those by the NHS, NDG and NAO were almost if not exclusively referring to past engagement. But many others, including many of those by the ICO, CDEI, OfCom, BEIS, DHSC, and HM Treasury, leant much more heavily towards future imperatives (in the case of ICO in particular, this was often as an instruction to other organisations rather than their own plans). This shows a split in terms of those making grand strategies for others to implement or to work out details later, versus the more operational side of building from existing relationships. Take the difference between DHSC and the NHS, for example.

Looking at use of stakeholder by creating department, regression analysis shows that the generic use of stakeholder without
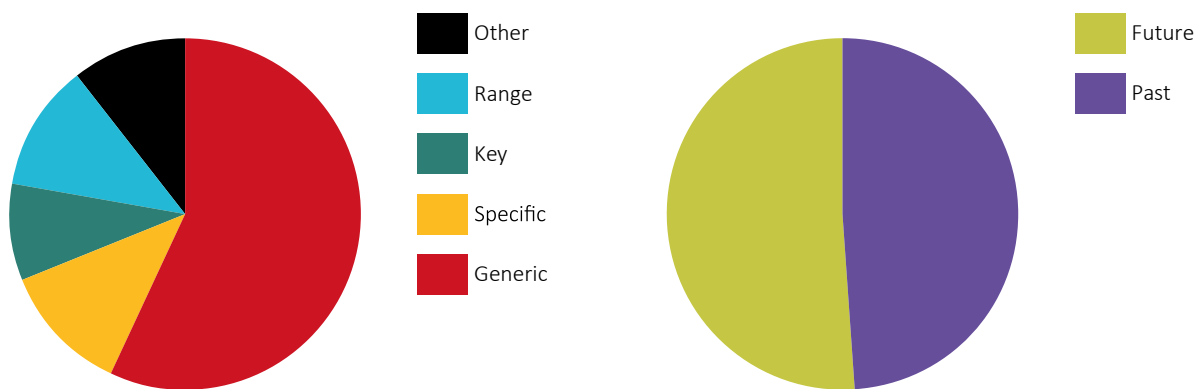
% usage of stakeholder, by type and by time

further description is strongly related to the total at a coefficient of 0.64 (with r2 of 0.98 and p≈0), as you might expect. The generic use was related to references to past engagement at a coefficient of 1.14 (with r2 of 0.96 and p≈0) and related to references to future engagement at a coefficient of 1.64 (with r2 of 0.84 and p≈0). This shows a steeper increase of generic usage in relation to future plans, demonstrating a non-performative, empty use of the term stakeholder within intended policy practices at the strategic level.

These findings show that the use of stakeholder tends to performatively entrench the existing power of "industry stakeholders" or nameless but clearly already engaged and empowered "key stakeholders". Meanwhile, they also construct a false sense of inclusion through the nonperformative use of generic or "other stakeholders". This creates significant risk of accountability, and raises significant questions over established processes such as consultation. When it is unclear who is influencing policy, whose voices and interests are being represented, then the indicators from specific uses suggest that the stakeholder becomes a foil for amplifying historical power and privilege, often on political and/or economic lines, and in doing so excludes the needs of those most affected by technologies who already suffer a lack of agency in how data, AI, platforms and other areas are used to shape their lives.

Citations

How does the use of the stakeholder compare to the voices represented in policy documents?

After an initial drop, average citations per document remained fairly stable year on year, although there was a large difference between documents, ranging from no citations to several hundred.
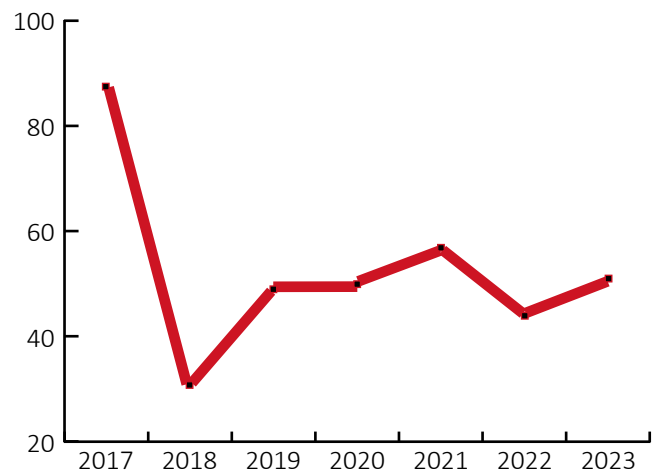
Average citations per document, by year

Half (50.4%) of all citations across all reports assessed were from government departments, while almost two thirds (125/194) had 50% or more sources from other government reports, showing a circularity and self-repetition across government departments and policies. Only 13 documents had no citations of government sources, though all but two of these had no citations at all. These 11 documents that had no citations included

three that were based on direct surveys, while the remainder were strategies and standards in areas like Defence.

% citations by source type

Legend:
- Other
- International Government
- Civil Society
- Media
- Industry
- Academia
- UK Government
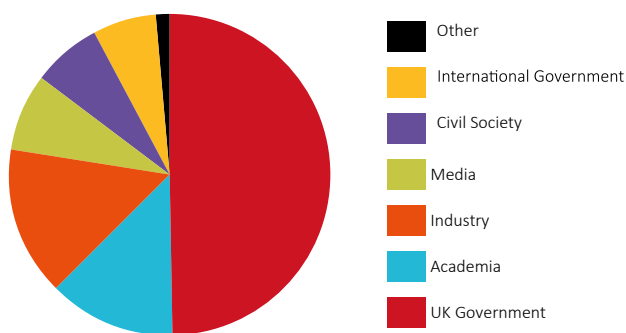
The dominance of government sources shows a consistent and common agenda through authoritative sources. It follows that larger or strategic documents would go on to shape many future policy documents, often in more specific areas of implementation. This tracks with how tech policy has spread across UK government departments as more areas have had to grapple with the impact of data, AI, platforms and the like on their particular remit. However, this insular sourcing of views carries a high risk of political single-mindedness and a closed agenda. Once particular strategies are put in place, they echo across different policy areas, which potentially overrides the needs of specific contexts – specific stakeholders and specific people or groups whose lives are 'at stake' – not to mention the wider expertise that could be brought in to inform these more specific areas. While it is again perhaps an effect of standard policy practices, the homogenisation

and setting in stone of policy agendas suggests the exclusion of alternative voices, particularly those most relevant to specific implementations of policy strategy. There is little consistent correlation between variables, and the more interesting findings come from observations based on categorical factors like which department created the document and the particular nature of the document. However, regression analysis shows a strong correlation between the percentage of government sources and the standard deviation between different types of sources (with r2 of 0.77 and p≈0), while multiple regression shows an overall negative correlation between standard deviation and percentages of different sources (with r2 of 0.83 and p≈0). These findings demonstrate that high levels of government sources leads to greater unevenness between voices, while more of any other type of source likely indicates a more diverse and even array of sources across different sectors. Documents reliant on government sources tend to escalate this insularity and circularity, and the dominance of internal citation suggests that established government narratives become entrenched across departments and homogenise policy agendas and priorities.

Reports by the Children's Commissioner were among the most reliant on civil society, and interestingly these two didn't mention stakeholders, despite the Children's Commissioner having a trend towards

higher levels of engagement with affected groups (specifically, children and parents). Health and social or ethical issues were among the areas that most highlighted work by civil society and academia. Seven such reports relied more on academia than other sources combined.

Four reports were more reliant on industry than other sources combined. The reports that had a higher than 1 standard deviation above average of industry sources were perhaps unsurprisingly within the areas of business, finance and cyber security. More surprising perhaps was that reports by devolved governments were also in

this group, which shows the focus of regional interest in technology and/or the areas where devolved governments are able to claim more agency over their engagement with technologies.

Media reporting was unsurprisingly highest concerning online habits and platforms. If we take into account the private ownership of media outlets and therefore combine them with industry, however, then we see this group dominating the influence over: the regulation of online platforms (in which they have significant self-interest); business strategy; and, perhaps most alarmingly, the UK Digital Strategy 2017.
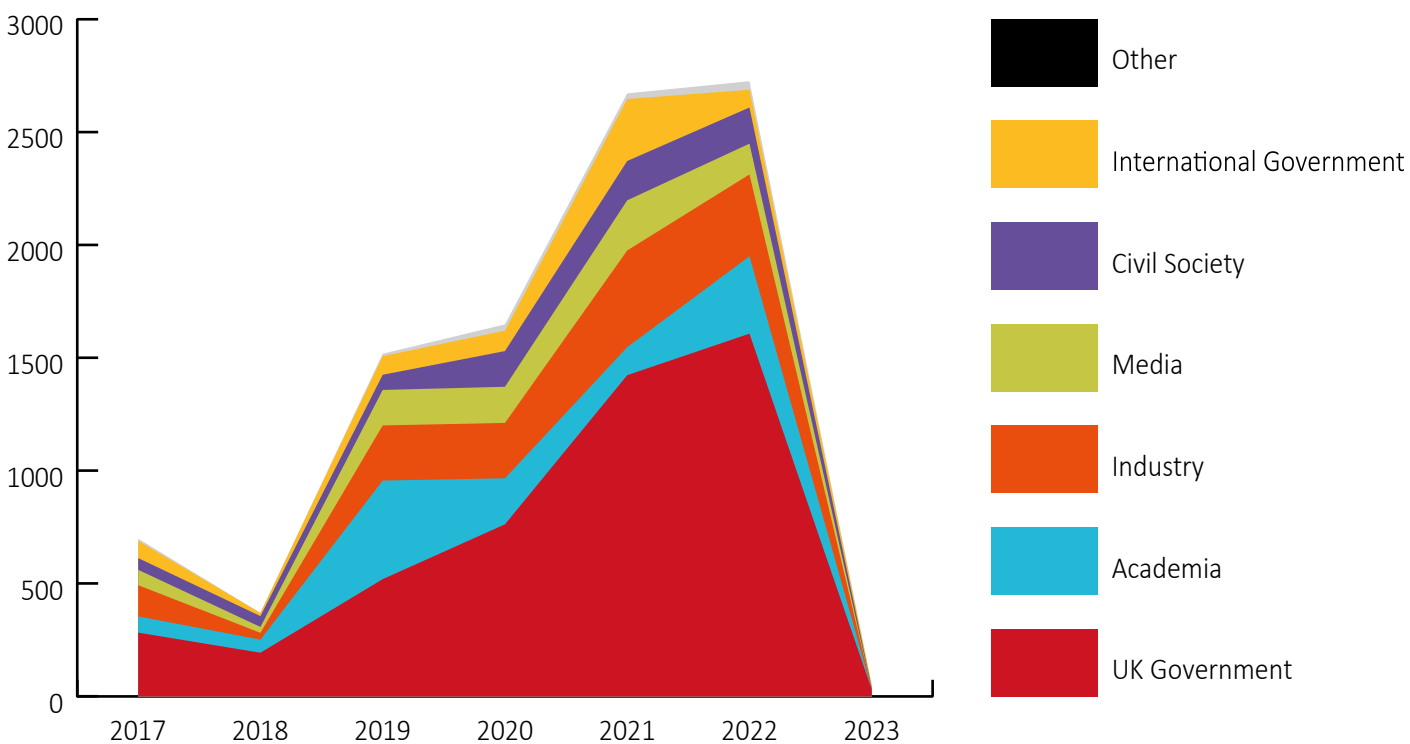
Citations by source type, per year

The report with the most evenly distributed sources across the categories was the ICO's 'Big data, AI, machine learning and data protection'. This is interesting as the ICO generally relies on a large number of self-cites, pointing readers to its wealth of guides and reports on the minutiae of data protection obligations. Against this narrow focus are reports such as this one which show a broader engagement with, for example, academia and civil society in establishing the groundwork for future policy work.

The UK Digital Strategy 2017 and 2022 shows in interesting divergence. Where the 2017 strategy was varied in its sources, by 2022 this had narrowed significantly to other government documents. This could partially be explained by the increase in government work on the area during that time, so there was simply more to draw on. But the period also saw further work by academia, civil society and others, so it still represents a shift in focus. Similar shifts towards centralised government sources over time can be seen in the difference between the National AI Strategy and the strategy's Action Plan the following year; while both were dominated by government sources, this was even more pronounced (58% to 79%) in the action plan. The same shift was also seen in the difference between interim and final reports, such as the CMA's Online Platforms and Digital Advertising Market study. The interim report was more diverse, with minimal deviation seen only in industry (above average) and civil society (under), whereas the final report showed the trend towards a government sources, in this case alongside industry.

This, in the context of the overall dominance of government sources, suggests that there are key moments – often more underlying research reports – where external parties can gain influence or make alternative voices heard. Then, once these are set in stone, the engagement narrows towards a more focused government narrative. This raises concerns surrounding the method of engagement with stakeholders, particularly when consultations list all submissions but do not directly match these in a transparent way to actual government policy.

Workshop

What is a stakeholder?

The first point of discussion during the workshop was how people understood stakeholder as a term in tech policy. A number of possible definitions or roles were mentioned, and these spanned people's own definitions, how they saw it being used in practice, and what they thought it could or should mean. Themes that emerged included:

- Impact
- Influence
- Interest
- Inclusion
- Whose needs are considered
- Whose views influence outcomes
- Who is affected and who benefits
- Who is needed for success of a particular agenda

One point that was raised during the workshop is the ambiguity around the term stakeholder with one of our guests questioning whether this was done intentionally to ensure success. For example, in our research, many of the instances we found where stakeholder was used it was used in future tense and referred broadly to engaging with stakeholders, with no specifics on numbers or types. Therefore any 'engagement' with stakeholders can count as successful without being specific about what it will actually involve. Another question that arose during the workshop was around the use of the term stakeholder from a language perspective. One of our guests raised the question of whether 'stakeholder' was used in a descriptive, evaluative or normative way. For example, they suggested it seemed to be used to describe who has the power in stakeholder relationships.

People identified the way stakeholder is often used synonymously with 'user', itself a very loaded term. User is also very broad and open for confusion; for example, a great deal of connected places/smart city literature were using 'user' to describe place managers procuring and using tech products and services rather than those who were affected. There was also discussion around whether stakeholders are considered external set of actors separate from the writers of the policy or documents, although arguably we are all stakeholders when it comes to tech policy.

These lines of enquiry are particularly of note to our focus on who is at stake in the outcomes of policy, rather than who already holds a stake in decision-making that defines policy. Such considerations lead back round to the descriptive, evaluative and normative debate. Is the stakeholder describing who has power, evaluating positive and negative

impacts, or normatively creating power (whether entrenching existing influence or redistributing decision-making processes)?

Workshop attendees also asked if there are stakeholders who are not people. Thinking about a more-than-human approach, the natural environment could be considered a stakeholder. This is becoming common practice in development: to as standard list the natural environment as a stakeholder. It is certainly 'at stake' in the increasing impact of technology, but is not able to exert such a stake. This turns round into the final and perhaps most important point of the discussion.

Should those who are at stake have to be an active stakeholder? Is being at stake a responsibility? Or do those who already hold a stake in power have a responsibility towards those who do not? Regulation should be for those with a stake, at stake, regardless of their knowledge, influence or level of 'engagement'.

This turns back around to what the term stakeholder does. Does it identify those with power and influence, a seat at the table, an invitation to contribute? Or does it represent all those who are affected by a policy, those who are at stake? The stakeholder has many meanings but they all point to power relations. Rather than engaging with stakeholders, it is more important to ensure that marginalised groups' interests are being represented in policy.

Policy practices

The consultation method used most commonly by major government departments is only one way of creating policy. There are other ways, other paths, that challenge this dominant approach, and create opportunities for engaging more directly with excluded groups, engaging more creatively with different groups, and expanding the policy process. The second part of our workshop was focused on exploring the different roles and opportunities that alternative policy processes can take.

Some of these are already happening within government. The Policy Lab is a key unit in innovating different types of engagement across government departments. Their work is well suited to the cross-cutting and expansive nature of tech policy, and increasing their role will be important as tech policy only continues to impact on more areas. Other methods of engagement have been explored by groups within DCMS and other departments, though this is often based on the specific team or individuals involved. There is a need to push this desire for more representative processes into the norm of policy creation. Giving those affected the tools to engage in new ways requires increasing access and education, and there are some efforts by the Parliament Knowledge Exchange team and Parliamentary Office of Science and

Technology to expand the work with civil society and academia as well as publics. Civil society is filled with people carrying great knowledge and purpose to create better tech policy, but they must be given space to follow these aims, and to share existing and new practices between departments.

Outside government there has been a range of interesting experiments with new forms of engagement. From civil society, groups like Demos[1], the Royal Society[2] and Ada Lovelace Institute[3] have all made progress in developing new methods of engaging with different publics, bringing together more diverse groups, and creating opportunities to challenge prevailing narratives. Academics working on this area include our attendees at the workshop, and particularly those involved in the SPRITE+, DISCRIBE and Digital Good networks, as well as projects like Me and My Big Data[4].

A range of innovative practices were discussed at the workshop, as well as others we encountered in the literature. They can be divided into key themes or approaches:

1   Judson, E. & Baines, V. (2023). Accept All: Unacceptable? Tracking the experience of trying to reclaim personal data – and what government, businesses and citizens can learn from it. Demos.
2   The Royal Society (2023). Data for Emergencies: public dialogue.
3   Patel, R. (2020) Rapid, online deliberation on COVID-19 technologies. Ada Lovelace Institute.
4   Yates, S., Carmi, E., Lockley, E., Wessels, B. & Pawluczuk, A. (2022) Me and My Big Data. University of Liverpool.

Public engagement

- Public attitudes research (conjoint analysis, focus groups, rapid public consultation)
- Deliberative processes (including citizen assemblies)
- Joint development/Co-creation of policy proposals (with potential roles for external civil society/academic groups to feed into government processes)
- Working groups with wider partners and members to influence direction of agenda
- Participatory approaches to research that encourage people to challenge tech in new ways

Mediation

- Using the convening power of external organisations to bring together diverse (and often antagonistic) groups. Events, dinners, away days provide opportunities for informal perspective sharing. However, participants highlighted their awareness of the risks of gatekeeping role and the potential for power asymmetries and expectations on the part of the organisations attending
- Engagement platforms like commonplace.is and pol.is offer interesting ways of engaging with different groups for building community space for deliberation, or adding computational tools for consensus. However, we should be mindful of

the potential pitfalls of using tech (especially platforms, data and AI) to regulate the same tech, particularly in terms of the values and aims that might be baked into the systems

Creativity

- Design fiction and speculative design, as research and engagement methods[5]
- World-building, policy prototyping and co-design of provocative prototypes
- Artistic contributions that inform and challenge public perceptions[6]

These different approaches will not work for all groups, and always risk creating further marginalisation. However, they offer a suite of tools that government departments and other organisations and communities can use to generate more representative processes and policies. There remains a role for advocacy and research organisations to voice and stand up for the interests of those who cannot or do not want to be directly involved in the policy process, and these tools can help with broadening out the inputs to consolidate an ever-evolving landscape of social research on the impact of tech. There are also different roles for different types of organisations in setting up and managing these tools, and this will be linked to their
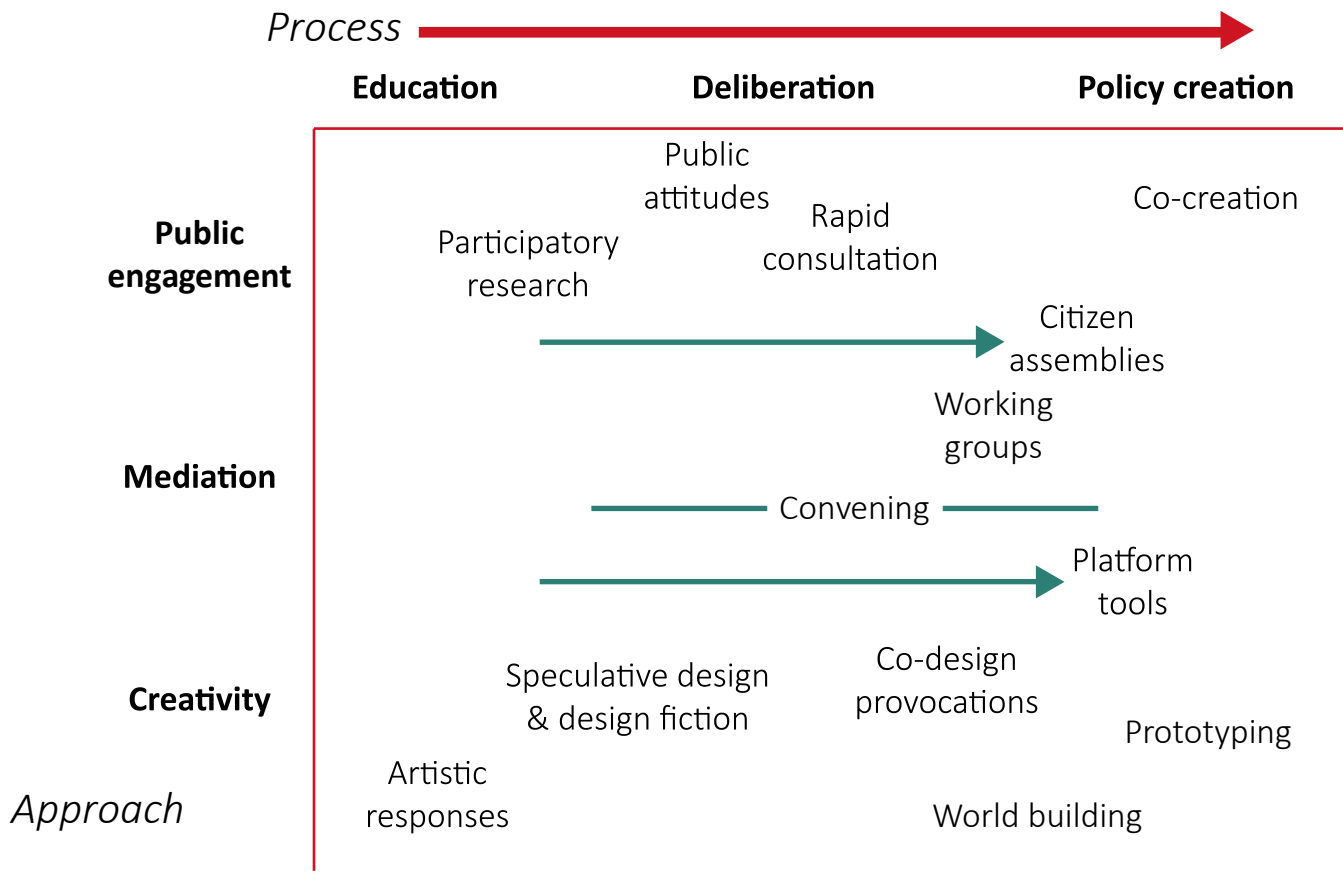
own ethos, priorities and existing contacts.

There is further potential to separate out the different functions the engagement types play within the phases of policy development, and they should be considered a toolkit to combine as appropriate. Which are more helpful for education? Which for deliberation and collaboration? Which for co-creation? How do these methods and phases work together?

The diagram opposite Shows how these forms of public engagement, mediation and creativity fit into the stages of education, deliberation and policy creation that can be used to bring wider groups into the policy process. It offers one approach to situating these tools in relation to one another. This takes into account the use of tools across multiple functions, and provides a view from which to combine them in order to build a more representative process for engaging with different publics in different ways, acknowledging that these will need to adapt to the specific context and specific affected groups.

It is likely that we need to restructure the entire policy process, particularly for an area like tech which spans so many other government bodies and areas of legislation. And yet, it should build on the work already being done in applying innovative methods to developing more representative policy. There are short

5   Mullagh, L., Kwon, N. & Jacobs, N. (2022) Trustlens. Lancaster University.
6   Mehrnezhad, M. & Toreini, E. (2023).CyFer. PETRAS.

Process

	Education	Deliberation	Policy creation
Public engagement	Participatory research	Public attitudes · Rapid consultation	Co-creation
Mediation		Citizen assemblies · Working groups · Convening	Platform tools
Creativity	Artistic responses	Speculative design & design fiction · Co-design provocations · World building	Prototyping

Approach

Tools for building policy processes, by type and phase

and long term opportunities to improve processes and practices, and in turn to shift overarching agendas and strategies to represent those at stake rather than those who already hold a stake in the decision-making process. Tech should be regulated in ways that respond to the needs of the most vulnerable, and there are many ways we can achieve this. But they all require a shift in focus of who policy is for and whose agendas shape the questions being asked and the possibilities that can be proposed.

In summary, our findings show that current policy processes are failing to include the voices of the most vulnerable, relying instead on established actors and gatekeepers. The use of the term stakeholder in policy disocurse has been shown to give more power to those already holding influence, while contributing little more than tokenistic desire to diversify who is involved in designing policy. There is a need to truly consider and recognise not who has a stake but who is at stake.

What's at stake for stakeholders?

The findings of this report demonstrate severe problems in the ways the "stakeholder" is currently being used in UK tech policy. The term does little to represent the needs of the most vulnerable, while entrenching existing power. This is in part due to the blurred and often contradictory meanings the stakeholder invokes, creating different roles for different groups within the same process.

The stakeholder can create power and influence, bestowing a particular entity with a "stake" in the issue at hand and the decision-making process in developing policy to address it. This tends to occur when the stakeholder specifies organisations or types of organisations, or refers to "key" stakeholders. The stakeholder in this sense tends to be government and specific sections of industry and academia. It is those with an existing political, financial or reputational "stake" that can be used as power. This form of the stakeholder is *performative*, in that it creates (performs) power through the act of labelling this stake.

The stakeholder can also deny power, excluding particular groups from the decision-making process. The "stake" here is being at stake, and this type of stakeholder tends to include those in
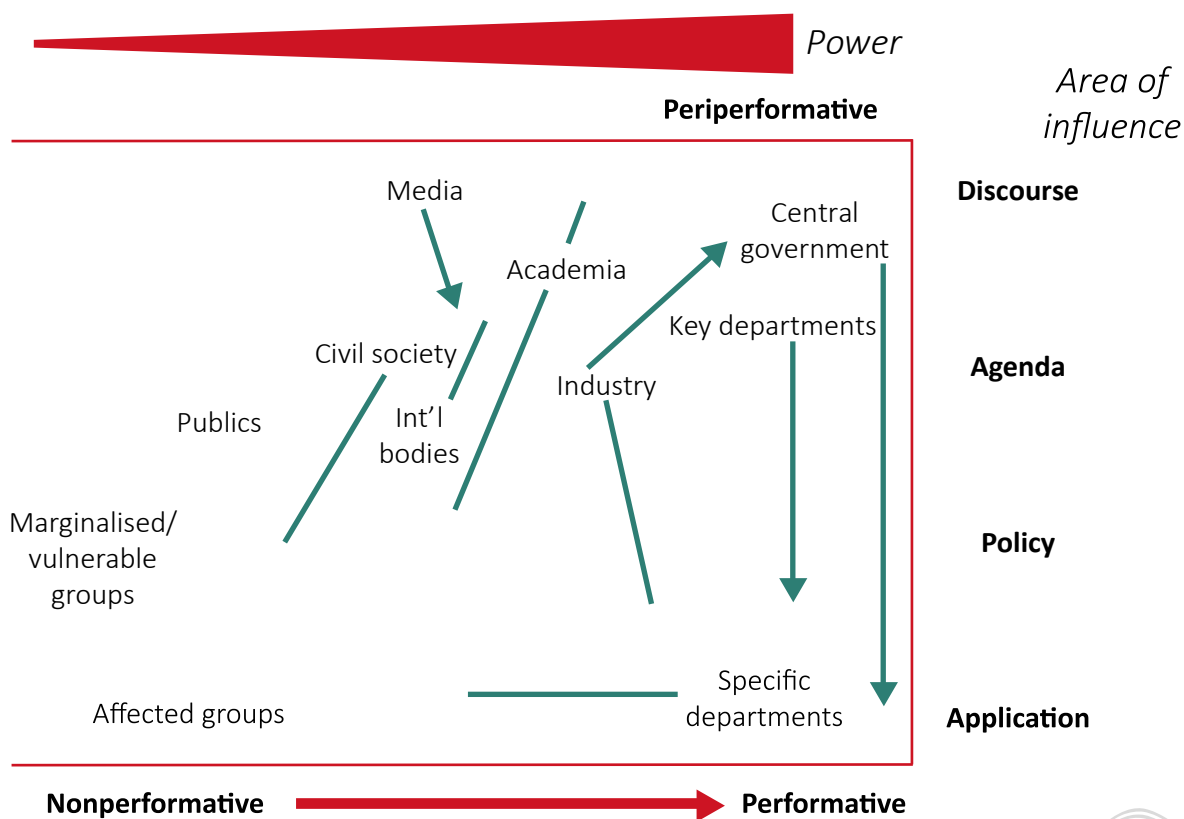
The shape of the stakeholder in UK tech policy

affected, marginalised or vulnerable groups. It is the publics and individuals without access to the policy-making process, without a direct say in having their interests and needs represented in policy outcomes. This use of the stakeholder tends to be in a generic sense, and a future, vague aim to engage with "diverse" or "wider" groups. In this sense, the stakeholder is *nonperformative*, as it describes a stake without giving any power to use that stake.

The way that stakeholder is used in different ways for different effects- to give power or to attempt to conceal a lack of power - is itself interesting in creating particular normative roles. The organisations using the term in their documents create for themselves the power to determine who has a say and who does not, who "counts" as a stakeholder, and whose "stake" matters. When this meaning of the stakeholder is used in a generic sense, it is to obscure whose voice is gaining influence, often in support of centralised power and dominant agendas. This form of the stakeholder is therefore periperformative, in that it is about the use of the term, setting the context and shaping what can be said and who can say it.

The diagram opposite plots the different groups in relation to power, performativity and areas of influence within the policy process. This is based on our analysis of the use of the term stakeholder, the citational practices of policy documents, and the

workshop discussion, as well as wider research into power and technology.

A further blurring needs to be acknowledged in the variation within any given use of the stakeholder. No sector is a unified monolith with only one perspective or set of interests. There are asymmetries of power even within each type of stakeholder: different government departments, big tech companies compared to small businesses, the Oxford-Cambridge-London "Golden Triangle" of academic institutions compared to the wider research community, insider or outsider civil society groups from established think tanks to small advocacy groups tackling specific issues. All these variations bestow different levels of influence, and we must always recognise the ways these differences tend to reflect historical indices of marginalisation.

However, things can be done differently. It is still possible to reinvent the policy process, to imagine different ways of creating policy that centre the representation of those most affected. Many of the existing mechanisms can be repurposed with the aim of designing policy for the most vulnerable. And the processes can be altered to include a wider range of ways people can engage. Being involved should be an option but not an obligation for those who tend to have decisions made about them without them. Either way, the stakeholder needs to be redefined to give power to those who need it.

Recommendations

Our findings show deep issues in the way UK tech policy is being created, and identify the term stakeholder as a key tool in perpetuating these problems. The consultation process performs power to those who already have it, particularly industry and the same regular influential organisations.

We divide our recommendations into two parts. The first is aimed at government: political parties and politicians, departments and bodies, and individual teams and policy leads. They are for anyone working inside the policy-making process, who might have an opportunity to think differently about who is represented in policy and the alternative ways the most vulnerable might have their needs supported. The second set of recommendations are for those outside of government: academics,

think tanks, charities, journalists, advocacy groups. They are for anyone seeking to influence the policy agenda to improve representation of marginalised groups, bringing expertise, critical perspectives and the needs of the vulnerable to challenge dominant narratives of power.

The recommendations work at different levels and different timescales. They are a set of options, a set of tools that are not mutually exclusive nor mutually essential. They will work in different contexts, for different groups. But they all contribute to challenging the existing processes, structure and agendas that have kept the interests of political and economic power at the heart of tech policy rather than representing the needs of people and society.

Recommendations for government

1 Stop using "stakeholder"

Our research shows that the use of the term stakeholder has lost meaning. It conceals power and excludes the vulnerable and the marginalised. Instead, policy documents should be more specific about who is and isn't involved, whose ideas and interests have fed into the final outcomes. This is part of improving transparency over who has power in policy-making and agenda-setting, and achieving greater accountability over politicians claiming to act in the public interest.

2 Representation not consultation

Consultation is a step but not enough. It risks shifting engagement to a rubber stamp once agendas and priorities, if not specific policy details, are already set. There is a need for a more specific commitment to representing the needs of the most vulnerable, regardless of whether they can or want to engage with the policy process. When engagement is sought, it should occur earlier in setting agendas, deciding which questions to ask, and should use the array of tools identified to engage with wider groups in new ways. Policy should be designed for and with the people affected, not approved after the fact.

3 More flexible policy-making process

Certain moments, and the documents that come from them, tend to set agendas and priorities for policy for a number of years. Government should make it clearer when these high influence documents are being made, and be more representative and inclusive when producing such documents. Otherwise it becomes the same few voices heard time and time again. There is the potential for audits to improve policy in a more iterative way, embracing the possibility for revisions and updates as tech and society change. There is also a role for wider engagement at the secondary legislation stage. This would avoid centralising power in capricious ministerial positions, and instead bring affected groups into centre stage when policy is applied to the specific areas in which they would be affected.

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4 Identify key moments for intervention

Certain policy moments and documents carry more weight than others. It is important, as much as possible, to identify where those will be. They are key moments to shape agendas, ask important questions, and challenge prevailing priorities. Importantly, it is also a key moment to share information, to empower access and promote others to get involved, whether that is through specific expertise we might have or introducing new groups to policy-makers. We all benefit from casting a wider net, and it is beneficial to a more representative policy process.

5 Be a mediator and representative

Those outside government but with the credibility and access to influence policy can take on roles that promote more inclusive and representative processes. This can include mediating discussions between disparate and conflicting groups in order to broaden the debate, as well as bringing new groups into the process. It can also include representing those who cannot be there themselves or do not wish to (or do not have the time, energy or expertise to) engage in the policy process. Advocating for the most vulnerable is a key role for academia, civil society and other groups. These two roles can assist in addressing the power asymmetries that currently plague the tech policy landscape.
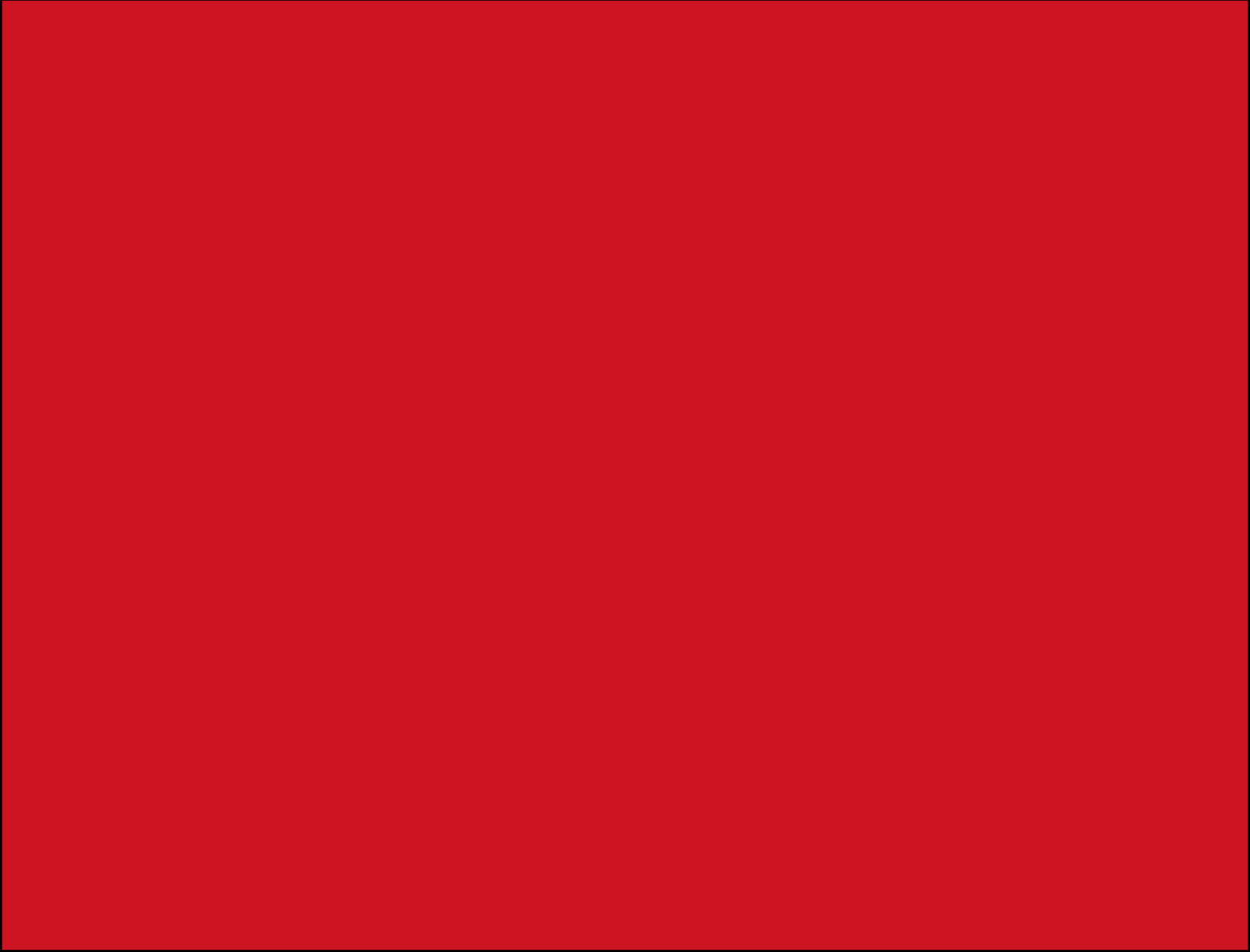
6 Be a gateway not a gatekeeper

Sometimes it is important to represent the needs of others, using expertise, research and other tools to ensure otherwise unheard voices can be heard. But it is also important not to let the soft power of reputation become entrenched into power over gatekeeping policy agendas. This is particularly important when considering historical privileges of certain institutions and individuals. Better inclusion and better representation means elevating the voices of those most affected by tech policy, taking a supporting role to the needs of those who are often left unheard.

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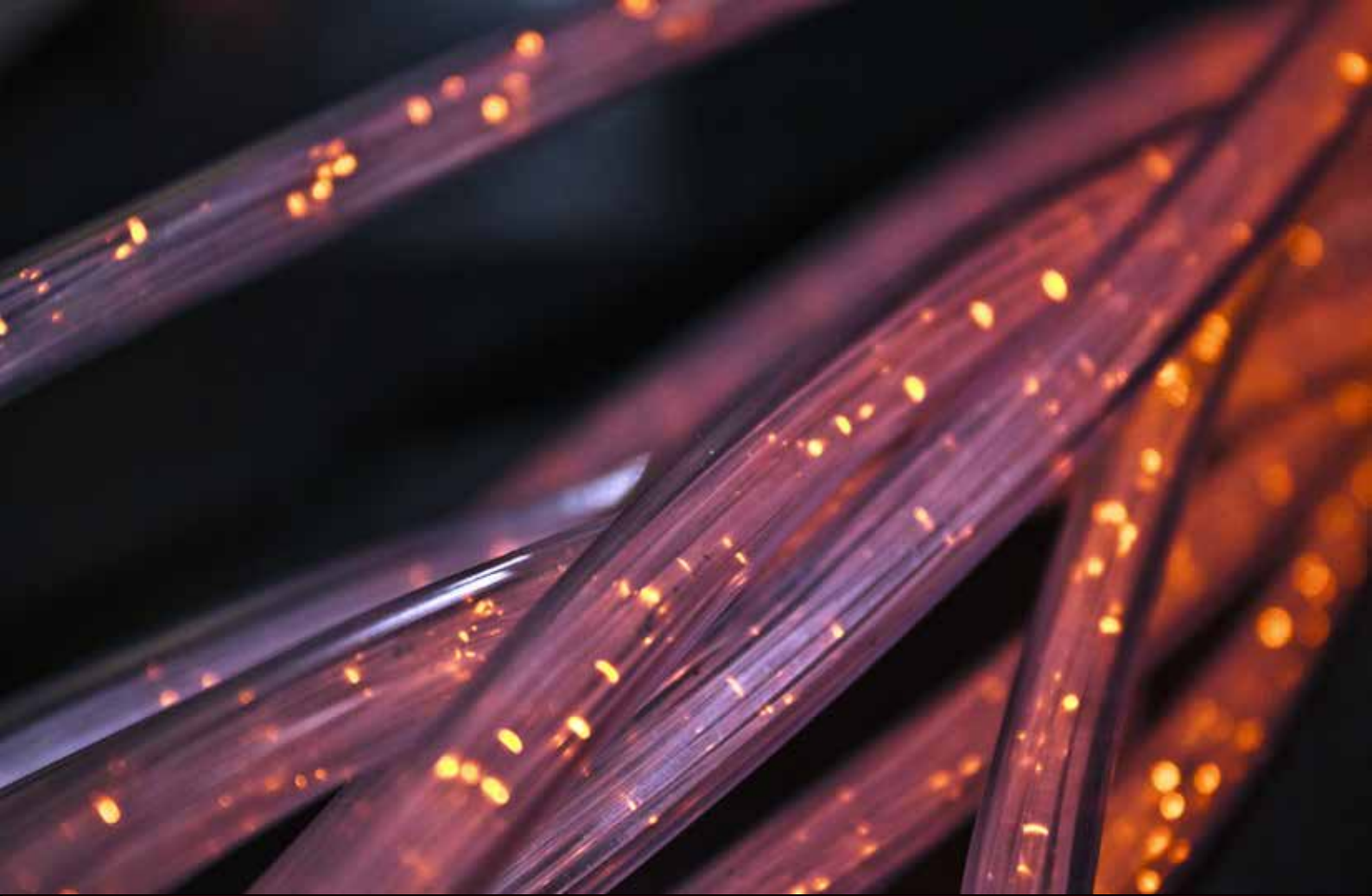
Appendix

Document list

ICO (2017) [Big data, AI, machine learning and data protection](#)
NIC (2017) [Data for the public good](#)
BEIS (2017) [Industrial Strategy White Paper](#)
DCMS (2017) [New Data Protection Bill: Our planned reforms](#)
Scottish Government (2017) [Scotland's Digital Strategy: Evidence Discussion Paper](#)
DEEU (2017) [The exchange and protection of personal data- a future partnership paper](#)
DCMS (2017) [UK Digital Strategy 2017](#)
DfT (2017) [Unlocking the UK's High Tech Economy: Consultation on the Safe Use of Drones in the UK Government Response](#)
DCMS (2018) [Government response to the Secure by Design informal consultation](#)
ICO (2018) [Information Rights Strategic Plan 2017-2021](#)
ONS (2018) [Joining up data for better statistics](#)
Children's Commissioner (2018) [Life in 'likes'](#)
ASA (2018) [More Impact Online: The ASA's 2019-2023 Strategy](#)
Cabinet Office (2018) [Open Standards Principles](#)
DCMS (2018) [Secure by Design: Improving the cyber security of consumer Internet of Things Report](#)
Welsh Government (2018) [System Reboot. Transforming public services through better use of digital: An expert panel report for the Welsh Government](#)

ICO (2018) Technology Strategy 2018-2021

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Welsh Government (2018) Welsh language technology action plan

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DfE (2019) National Standards for Essential Digital Skills

HM Government (2019) Online Harms: White Paper

CMA (2019) Online Platforms and Digital Advertising: Market Study Interim Report

CDEI (2019) Online Targeting: Landscape Summary

ICO (2019) Project explAIn interim report

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NHS (2019) The Topol Review: The digital future of mental healthcare and its workforce

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DCMS (2019) UK National Action Plan for Open Government 2021-23

CDDO, Office for AI (2019) Understanding AI Ethics and Safety

HM Treasury (2019) Unlocking digital competition, Report of the Digital Competition Expert Panel

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ICO (2019) Update report into adtech and real time bidding

OfCom (2019) Use of AI in online content moderation

Welsh Government (2019) Wales 4.0: delivering economic transformation for a better future of work

CMA (2020) A new pro-competition regime for digital markets: Advice of the Digital Markets Taskforce

Children's Commissioner (2020) Access denied: How end-to-end encryption threatens children's safety online

CDEI (2020) Addressing Trust in Public Sector Data Use

ICO (2020) Age Appropriate Design

CDEI (2020) AI Barometer Report

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