



**Roinn Cumarsáide, Gníomhaithe
ar son na hAeráide & Comhshaoil**
Department of Communications,
Climate Action & Environment

Guidance for Staff on Stakeholder Engagement

Why DCCAE needs Guidance on Stakeholder Engagement

The Department of Communications, Climate Action & Environment (DCCAE) is responsible for policy underpinning the delivery of a range of critical services to all our citizens and the development of new policy to safeguard our future. We operate in a complex and often highly technical environment where many factors have to be balanced in designing policies and programmes. We are also operating in a new and fast changing world of communication and social media where individual have hugely increased expectations that their voice will be heard. Our traditional approach to decision making has to change to accommodate this. This does not mean we all need to be on social media, but we do need to recognise that the voice of the individual has an impact and we have to respond to that to maintain our credibility as policy makers.

With responsibilities ranging from critical infrastructure, to climate action, to natural resource development, so much of what we do impacts on the lives of citizens in Ireland – in the work place, the community or the home. This is why it is important for DCCAE staff to engage effectively with a huge range of stakeholders, from government, agencies and state companies, to a highly diverse range of organisations, groups and individuals from all walks of life in Ireland. The 28 business plans created across DCCAE for 2016 make reference to approximately 300 primary external stakeholders, and we know this is just a summary of our stakeholders. And that doesn't include all those people on local communities whose lives are impacted by the decisions we make. With such diversity in our remit, we must be mindful that stakeholders could perceive conflicts and inconsistencies in how different parts of the Department engage with them. This has big implications for our credibility.

Dealing with such a wide and diverse range of stakeholders as DCCAE has is a challenging but critical opportunity. Effectively communicating with citizens and organisations, as part of normal business operations i.e. understanding and managing stakeholder views, and their expectations, ensures that policies are developed with a full understanding of stakeholder needs, and a better public understanding of their scope to influence those policies. It also helps build consensus and understanding of the rationale for certain policy decisions, in which there can be intense public interest.



DCCAE staff are also regularly required to undertake formal stakeholder engagement as statutory requirement through Strategic Environmental Assessments (SEA) or the Aarhus Convention. This guidance is designed to assist in completing these obligatory processes and should be used alongside technical guidance documents for them.

Recurring themes we hear from our stakeholders currently include: their views are not being heard, not being acted upon or that they don't have enough information. In addition, those outside Government often say that we are inwardly focused and operate in 'silos'. Nevertheless, there is a growing recognition and ability within DCCAE to improve the quality of our engagement with stakeholders so that these negative experiences become a dialogue and DCCAE takes the opportunity to ensure that accurate information about what we do becomes accessible and understood.

Improving the way we communicate with citizens is just as important as our engagement with other Government Departments and the Oireachtas – stakeholders whose views and reactions we're likely to be much more familiar with and who are simply easier to engage with as a coherent group. While engagement with our wider stakeholders may at this stage be new territory for us, we cannot achieve our objectives without their input and cooperation. The onus is on us to engage with, and inform all of our stakeholders, be they government and industry that we currently work with as a norm, or the much more diverse and diffuse stakeholder group – the citizens we serve. This will involve a change in our culture, but a change that is necessary if we are to put the values and behaviours set out in our Governance Standard into practice.

Context

Improved stakeholder engagement is a central part of the Civil Service Renewal Plan – with its objective of making the civil service unified, professional, responsive, open and accountable – and the Open Government Partnership National Action Plan. Using these Plans as its basis, this guidance builds on our wider DCCAE Communications and Governance Strategy, which has seen the launch of our new website in September 2015 and our Governance Standard in April 2016. The Governance Standard sets out the values of public service, openness and transparency. In



order to make sure that these values really do underpin our actions, we are committed to a collaborative and consultative approach to dialogue with our stakeholders.

This in turn is critical if we are to attain the high performance standards we are also committed to. In this way, this guidance will support our achievement of the objectives set out in our Statement of Strategy, Business Plans and Customer Service Charter. This guidance has been developed because transparent, equitable and timely engagement with stakeholders is a basic requirement for every professional organisation, and especially for a modern Government Department. Meaningful stakeholder engagement should be a core element for the achievement of all of our goals and therefore central to our annual business planning process.

This guidance has been developed with help from all Divisions in DCCAE for the staff of DCCAE. It is a tool to support staff in their work and capture what we're learning. Putting it into practice will build our capacity to engage constructively with our stakeholders who are, after all, the people we serve. Engaging with stakeholders doesn't mean that we are bound to agree with all of their views. Rather, it is a tool to manage the points of disagreement and make sure the DCCAE position is informed by different points of view and communicated in a way that is consistent, accurate and accessible for everyone.

The Strategic Development & Communications Unit (SDCU) will support staff to use this guidance, whether that is at the start of a major project, or when they need to better manage day to day engagement with stakeholders. SDCU will continue to develop this guidance as we incorporate experience in stakeholder engagement across DCCAE. That experience is captured in the case studies included in Annex I. The process of consultation that began with the development of this framework will continue and the input and advice of those individual staff members that have given their time to it is acknowledged.

The scope of this document covers:

- Understanding what stakeholder engagement is
- Principles of good stakeholder engagement
- Benefits of stakeholder engagement
- How to undertake stakeholder engagement



- How to work together better as a Department to ensure we're engaging with our stakeholders in a consistent way

Understanding what stakeholder engagement is

A stakeholder is an individual, organisation or social group who can affect, or is affected by, what we do in DCCAE. Our stakeholders are internal and external i.e. our colleagues in the Department are stakeholders in what we are trying to achieve every bit as much as the public.

Stakeholder engagement is the process through which an organisation involves people who may be affected by the decisions it makes. There are different levels to the intensity of that engagement. Simply wanting to inform people of an issue requires a different approach to seeking their input into a decision i.e. putting stakeholders in a position to influence the outcome. We need to be very clear about the nature of the engagement we are seeking to manage and ensure transparency and credibility.

Therefore, engaging with stakeholders needs to take place at every stage of a process or policy and should begin as early as possible. But we must also ensure it is an ongoing part of our work. This means that stakeholder engagement forms part of everyday activity such as keeping the website up to date and ensuring that replies to Rep's and PQ's are of a high standard. Monitoring stakeholder reactions and utilising their influence on an ongoing basis is an invaluable tool for effective implementation and must be done if policy makers are to remain responsive.

Principles of good stakeholder engagement in DCCAE

There is a huge amount of research literature and documented experience that demonstrates what constitutes best practice in stakeholder engagement. This guidance note summarises this best practice in the following principles, which are the 'ground rules' for stakeholder engagement by DCCAE. Stakeholder engagement within and by DCCAE should be:

- **Open transparent and trustworthy:** these principles are core values of the civil and public service and must stand at the heart of our stakeholder engagement activity. This is why engagement at the earliest opportunity is so important to establish trust and credibility with



stakeholders. Being transparent means giving as much information as possible about the decision making process and where our consultation fits into that process.

- Being trustworthy may very well mean being upfront and realistic about the scope of influence stakeholders. Giving stakeholders unrealistic expectations from the start will undermine this principle straight away.
- **Inclusive:** the approach should be to include the widest practical range of stakeholders. This can be very important for preparing the 'receiving environment' for your initiative. People like to know what's coming down the tracks even if they don't feel they need to engage closely.
- **Impartial and objective:** all views must be sought, even where it is known that they could be contrary to the policy aim in question. We must be prepared to be seen to have our assumptions tested. We must also be very clear to give stakeholders realistic expectations of the scope they have to influence the decision or policy.
- **Responsive:** timely feedback to stakeholders is critical if they are to feel that their views are being heard and considered. We must be ready to respond with alternative action where an impartial and objective evaluation of the evidence produced by stakeholder engagement points to an alternative approach. We must also be able to clearly *demonstrate* that we have considered the responses and views of stakeholders, particularly to be able to clearly explain why the approach is not being changed, despite views being expressed that it should.
- **Respectful:** all stakeholders have the right to be heard and their views should be respected by DCCAE. Nevertheless, this is a two way street and staff in DCCAE have the right to expect their dealings with stakeholders, both internal and external, will be based on courtesy and mutual respect.



What are the practical benefits of stakeholder engagement for DCCAE?

In addition to good stakeholder engagement being a matter of principle and core to the values of DCCAE, there are practical benefits to be gained:

- Understanding stakeholder needs is critical if we are to continually improve the services we offer and policies we develop, and make best use of the resources we are allocated.
 - We cannot undertake evidence based policy making if a key piece of the equation, i.e. the evidence of public need, is not gathered and available to us.
 - Stakeholder knowledge can be a crucial way of informing policy action – often they know what’s happening, and what could work, on the ground.
 - Stakeholder engagement is an important way to identify risks that we may not have been aware of – engagement broadens our viewpoint.
 - Engaging before we introduce change prepares the ground for it. It might not increase support, but it will improve public understanding and increase the chance of the debate being an informed one.
 - Part of the reason this guidance has been produced is that stakeholder engagement is a cross-Government priority and we must be part of this drive to improve public sector performance.
 - Increasingly, we need to work in partnership with other organisations (government departments and agencies, NGO’s, business and citizen representative organisations) to develop and implement our policies and services – we have to know what they need and we have to empower these groups to work with us. We should be prepared to collaborate where common interest lies.
 - Engaging with each other (as internal stakeholders) is practical way of getting ourselves out of the ‘silos’ we have become so good at working within and which we all acknowledge we need to move out of if our Department is to work effectively as a team.
 - We have a statutory obligation (i.e. the Aarhus Convention and EU legislation) to support citizens to participate in policy making. This guidance is an important and practical step by
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DCCAIE to drive the need identified in the Civil Service Renewal Plan to make the Civil Service unified, professional, responsive, open and accountable.

- Fundamental to carrying out our duties as public servants is how we serve the democratic process. Meaningful stakeholder engagement, carried out as early as possible, is central to productive and effective interaction with the Oireachtas.

How to undertake Stakeholder Engagement

How to create a Stakeholder Engagement Plan

Remember, the important thing is to make a start. Begin modestly and build up as you learn more about your stakeholders. A plan is only as good as its implementation. Seek support and guidance from SDCU and use other resources available to you in the Department such as the Press Office and colleagues who have experience of various approaches to stakeholder engagement. Follow this 5 step template to create a Stakeholder Engagement Plan, which can be used and refined to suit your needs for all types of stakeholder engagement situations:

- 1. Identify the purpose of your engagement – what are you trying to achieve?*
- 2. Identify your stakeholders – who do you need to engage with?*
- 3. Carry out a stakeholder analysis – what are your stakeholders interested in and how can they influence your objective? What do they need? What worries them?*
- 4. What is the best way to engage with stakeholders – what type of engagement is best suited to each stakeholder group?*
- 5. Do a short risk assessment and make a contingency plan*
- 6. Set out a timeline for the engagement process that caters to the needs of your stakeholders – it needs to be user friendly*
- 7. Evaluate your stakeholder engagement – what worked and what didn't and how can we use this to make our business plan better?*



1. *Identify the purpose of your engagement – what are you trying to achieve?*

Understanding what it is you are trying to achieve with your stakeholder engagement is central to its success. There are a wide range of reasons why you might reach out. In reality there may be a number of reasons why stakeholder engagement is necessary. Understanding why you are seeking engagement will help you decide which option(s) is best for what you want to achieve (see step 2). Do you want to:

- Engage on a ‘once-off’ basis for a project or on an on-going basis on an enduring issue
- Make sure the Department makes better, more informed, decisions
- Improve public awareness of the issue
- Gain a better understanding of concerns on the ground
- Address existing opposition
- Address a lack of information
- Comply with a legal obligation – is an SEA required? Does the issue come under the Aarhus Convention, and if not can you set out why?
- Identify and manage potential risks and pitfalls to new activity
- Develop long term partnerships
- Communicate information / requirements to a particular grouping
- Communicate the Department’s position to another Government Departments or the Oireachtas and get support for legislation, funding etc.

Often you will find that a combination of reasons will lie behind the need for stakeholder engagement.



2. Identify your stakeholders – who do you need to engage with?

Using sources such as your business plan, rep's, PQ's, press coverage or research and analysis that may have been carried out in the sector, list the individuals and organisations your area has dealt with on the issue or project in question. Once you have an initial list, you can:

- List out what each stakeholder *wants and needs* from the Department
- List out what the Department *wants and needs* from these stakeholders
- Do all of these *wants and needs* relate to the purpose you have identified for your engagement plan?
- Start to think about your evaluation plan (see step 5) – what information will you want to collect to evaluate your engagement process?
- Be prepared for the list of stakeholders to expand as you build your network of contacts and understand your 'audience' better.
- Have colleagues in other parts of the Department dealt with these stakeholders? When and how? What did they learn that you should put into practice?



3. *Carry out a stakeholder analysis – what are your stakeholders interested in and how can they influence your objective?*

Central to effective stakeholder engagement is to understand the ways in which your stakeholders can influence the outcome of what you're trying to achieve and the impact such influence might have. Carrying out a basic stakeholder analysis helps you understand how to focus your attention according to these scales of influence and impact. Remember, it is very likely that stakeholders will have pre-conceived ideas about the Department and what we do, based on previous experience or general public views.

Once you have listed your stakeholders, describe them. Are they:

- Partners – do they already support you and provide helpful influence and positive impact?
- Allies – could they be encouraged to support you?
- Passive supporter – they are content with what you're trying to do but won't seek to influence
- 'on the fence' – their allegiance is unclear but you need to understand where they are coming from before you can assess influence and impact
- Opponents – clearly opposed to what you are trying to achieve – this opposition is information you must use to understand their point of view and be in a position to influence them and manage the impact they could have on your project
- Silent – they have a clear stake in what you are trying to do, but no way of being heard and so may have little or no influence and no way of impacting on the project – you need to consider being an advocate for this group (a situation we often find ourselves in as public servants) and help build their capacity to engage with us and participate in policy making in their interest
- New or legacy – are you engaging with a cohort for the first time or is there a history that you might want to 'start over'
- Vulnerable or hard to reach – it is critical that you pay particular attention to these groups.



Populating this simple grid will give you a quick way of visualising this stakeholder analysis helping you to start to think about how to go about communicating with each type or group of stakeholders (see step 4):

I M P A C T	High		
	Low		
		Low	High
		INFLUENCE	

Using this simple analysis as a starting point, you can undertake a more sophisticated approach to identifying the levels of stakeholders according to their influence and impact if the complexity of your project warrants it. SDCU can help you do this.

A basic rule is that the more influence and impact a stakeholder has the more frequent and intensive the engagement should be. However, even where there is not a need for intensive engagement such as frequent one to one meetings, less intensive engagement, such as information on the website or occasional progress reports, needs to be just as carefully prepared and consistently maintained. If you let information on the web go out of date or miss an annual update you won't have the same opportunity to make up lost ground that you may have with stakeholders you're dealing with on a regular basis and with whom you can establish a working relationship.



At this stage it is essential to be clear for your stakeholders on what their expectations of the process should be. Explain what the scope of the engagement is. Are you simply providing them with information or are you giving them an opportunity to influence the process? Will there be issues which they will not be able to influence and which are not up for change as a result of the engagement process. You need to clearly communicate such limitations as soon as possible. It might not be well received but the negativity would be much greater if this critical information comes to stakeholders too late.

4. Communications – what type of engagement is best suited to each stakeholder group?

A communications plan is the tool through which you will build trust with your stakeholders, even those that are opposed to your objective. A communications plan does not have to be complicated. In fact you may find that you are already communicating sufficiently with some stakeholders or that the tools you need are already available.

What is critical is that you make sure your communications plan is part of your overall project plan and that it is managed as a clear work stream within the project. This is how stakeholder engagement becomes embedded in normal project planning and business delivery. It is important that the output is usable and adds value to the overall project. Your Communications Liaison will have a key role to play here. Remember to be responsive and open to including new contacts as you get a better understanding of your stakeholder group. A template for a communications plan is included at Annex I. It is critical that each communications plan has a leader who is tasked with ensuring the following:

- Review purpose and key messages to be conveyed – are you using ‘plain English?’
 - Make clear to stakeholders the purpose of the consultation, the parameters of the exercise (i.e. what it does and does not set out to achieve), the aspects that are open to influence (as opposed to those that have already been decided) and any constraints that they should be aware of
 - Check that material is aligned with Department Statement of Strategy
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- Choose an engagement tool(s) – see Annex II

- Assess the pros and cons of the tool(s) chosen – talking to colleagues who have undertaken these actions is very useful. SDCU can put you in touch.

- Assess how the tool(s) you chose need to be resourced – do you need to prioritise over other work; request support from colleagues for a time; seek technical support i.e. branding, IT?

- Consider how long it will take and whether milestones can be achieved? What will the expectations of your stakeholders be once they get the chance to participate? How quickly will they expect a response?

- Assess as you go along whether the engagement is reaching your audience and are there risks to the approach(es) you are taking?

- Is professional facilitation required to help you strike the right tone and use the right language?

- Do you need to partner with other organisations to build credibility and extend your reach? e.g. industry bodies, NGO's etc?

- How physically accessible are your engagement options – can people use public transport to get to meetings, can they travel far, can they use the internet?

- Prepare feedback material to find out how stakeholder experience how your engaging with them to allow you to evaluate your work (see step 5)

- Ensure that you fulfilling all the statutory obligations e.g. FOI, SEA, Aarhus Convention

- Remember, feedback is communication too. Decide if you will put all responses to your consultation online and notify respondents accordingly from the start – it always good to put as much in the public domain as possible.

- Provide clear feedback as to what parts of stakeholder feedback are being included in your project or policy and *why*. It is very important that the impact of engagement on policy making/project implementation is demonstrated to stakeholders and you can justify why you have not followed a recommendation they have made. The summary reports prepared



as part of Strategic Environmental Assessments (SEA) are a useful model to follow even if you don't have to do an SEA.

Holding a workshop for respondents to a consultation or information sessions for interested parties can be very good ways of having these kind of more complex conversations.

5. Do a short risk assessment and make a contingency plan

This is an important step to take when you have most of the work done on your engagement plan and you've developed an understanding of the issues. It should explore some 'what if' scenarios, focusing for example on the way communications should be handled in different situations such as, a delay in the process, protests, national media or political interest.

6. Set out a timeline for the engagement process that caters to the needs of your stakeholders – it needs to be user friendly

This is quite self-explanatory but really important. You need to think about: where your stakeholders are based; can they travel to information sessions; do they have access to communications platforms; do they have the technical capacity to engage; what time of day should you arrange meetings or workshops; what's the best location (in terms of access and being 'neutral ground'); will they have enough time to respond; is the process too long – will people lose interest and will the credibility of the process be undermined?

7. Evaluate your stakeholder engagement and always include in your business plan

How we engage with our stakeholders needs to be part of how we do our business. Therefore, stakeholder engagement must be part of the annual business plan for each Division and part of project planning. Like stakeholder analysis, you can take a very sophisticated approach to this and that may be a very good investment for your long term objective. As a minimum be guided by these questions as you review each step of the process and establish what you would do again and what you would do differently:

- **Planning**
 - Did we make proper use of the resources available to us in DCCAE?
 - Did we use our team resources well enough? E.g. did we include our Communications Liaison?



- Did we identify all the stakeholders we should have soon enough?
- Did we give too little or too much time to defining our purpose; identifying our stakeholders; doing our stakeholder analysis?
- Did we include preparation for evaluation?

- Engagement
 - Did we leave enough time to engage with the full range of stakeholders?
 - Did we use our existing communications tools or did we try new ones?
 - How did we find using new communications tools? Would we use them again?
 - Did an event or approach fail and why? Did this damage the cause and how can we repair it?
 - Did we follow up with stakeholders to find out how they found our engagement approach (as distinct from their views on our project or policy issue)?

- Implementation
 - How has the policy position changed?
 - Have we communicated this (externally and internally)?
 - Are we giving a better service? Can we measure this?
 - Has there been a change in stakeholder response e.g. Rep's, PQ's, press?
 - Have any stakeholders relationships changed and how will this impact on our work in future?
 - Are we working any better? Have we shared this with colleagues?
 - Are we incorporating this learning into how we do our business planning and PMDS? e.g. have we prepared a short report for the team to refer to in future and to be available to colleagues and the Department via the intranet?



Stakeholder Engagement Checklist

When you have completed these 5 steps run through these questions. They cover the essentials for any stakeholder engagement plan:

- Have we talked to a colleague with experience of stakeholder engagement and SDCU?
- Who are our stakeholders?
- What are their needs and expectations?
- What are the key messages we need to convey?
- What are the outcomes we hope to achieve?
- What statutory requirements must be fulfilled?
- What level of engagement is required?
- What method of engagement will we use?
- What are the timing issues?
- What are the resource/logistics needed?
- Who is responsible for the development and implementation of our communications plan?
- What are the risks associated with the method(s) of engagement we're using?
- How are we managing those risks?
- How will we provide feedback to stakeholders?



- How will we evaluate this engagement process – are we collecting the information we need as we go or will we follow later? How will we learn from it?



- Can we contribute to developing this guidance?

This guidance is a work in progress. If you have experience of stakeholder engagement, and/or you have used this guidance, please let us know and show us how we can improve it.

Annex I – Case Studies -Warmth and Wellbeing

stakeholder engagement

Background and Challenges

The Warmth and Wellbeing scheme is a pilot scheme which is providing free energy efficiency upgrades to homes of people who are living with chronic health conditions and who are in receipt of the fuel allowance. The scheme is primarily an energy efficiency and affordability initiative, and is part of the Government’s Strategy to Combat Energy Poverty. The scheme drew on the experience of a similar scheme in New Zealand – the Warm up New Zealand scheme. Given that the scheme was initiated by the DCCAE from an Energy perspective, knowing how the health world would respond to the scheme was an unknown at the outset.

Approach

Two stages of stakeholder engagement were involved. Firstly, DCCAE and SEAI needed to engage with the Department of Health and the HSE to get support for the scheme and to familiarise the stakeholders with decision-making powers about the scheme itself and the multiple benefits of energy efficiency in general. DCCAE and the SEAI began working with a consultant in the health area to learn how to design a scheme cutting across both the energy and health sectors.

Stakeholder identification and analysis took place at this stage and a stakeholder map was drawn up. Working from this the group was able to consult with these stakeholders to scope the potential for a scheme as well as what it might look like. Extensive stakeholder engagement took place at this phase with people working in the Department of Health as well as the health and



energy sectors and research bodies and NGOs. This work was critical in the final design of the scheme.

Engaging with stakeholders early on ensured that barriers which could have been encountered later on when seeking approval of and commitment to the scheme from the Department of Health did not arise. Engaging with the health research bodies and the HSE health intelligence unit enabled DCCAE to identify the appropriate medical conditions which could improve the most from energy efficiency improvements to the homes of people living with them.

Secondly, once the details of the scheme were decided and teams put in place to run the scheme, engagement with stakeholders who could help to recruit participants took place. To help with this process a stakeholder communications plan was written. This plan outlines each type of stakeholder and each type of communication that takes place with them.

Engaging with NGOs, local politicians, media and public healthcare officials helped to identify appropriate channels of publicising and promoting the scheme for the participant recruitment phase. Even though the works offered under the scheme are done completely free of charge to the householders, a level of encouragement from a trusted advisor was necessary. Therefore engagement with stakeholders who can fulfil this role is very important.

Results

The stakeholders with the greatest power in the success of the scheme were engaged at the scheme design stage and therefore have a much greater interest in its success than might have otherwise been the case.

The people working on the scheme on the ground were also approached at an early stage and were asked for their input as to how they could see the scheme working. Training in the energy sector was provided to them to help make the connection with the health world more apparent.

The communications plan forms the basis for monthly communications updates which are provided at meetings of the Implementation Team and Steering Group for the scheme.

Engagement with stakeholders for the purpose of publicity is ongoing and more and more channels are being identified as the process continues. New stakeholders and new types of



communication can be added to the stakeholder map and stakeholder communications plan as the scheme progresses.

As the scheme progresses it is apparent that the work done on stakeholder engagement and communications will form a big part of the evaluation of the scheme for potential national rollout.

Energy Efficiency and Affordability Division

Annex II - Range of engagement tools

The first three – using the website, keeping messages in Rep’s current and briefing members of the Oireachtas should be undertaken as a matter of course.

- Department Website (*see DCCAE website protocol*)
- New messaging for rep’s on key issues
- Briefing (oral and written) for members of the Oireachtas (*remember to clear all briefing with the Minister*)
- Full public consultation (use the *DPER Consultation Principles & Guidelines* document and you ensure that your process is aligned with the Department’s own procedures and branding – talk to SDCU)
- Targeted consultation
- Face to face meetings – once off or on a structured basis
- Roadshow
- Stakeholder Workshop
- Information stand at relevant conferences or events
- Publicity campaign
- Open meetings
- Social media



- Feedback material – paper or online surveys; follow up calls or meetings, to capture stakeholder reaction to your engagement process (rather than the project or issue itself) – you can learn a lot about people’s views, concerns and values when you are not talking directly to them about an issue

