

Do Bureaucratic Organizations Lobby? The Case of Ghana Immigration Service

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Abstract

Information from seventy interviews and secondary evidence was used to investigate the relationship between Ghana Immigration Service's (GIS) lobbying and the outcomes it produced. The focus of the investigation was on four areas: the strategies and tactics of lobbying employed; intermediate outcomes achieved; final outcome attained; and the effect of GIS's lobbying on politics-administration relations. The evidence showed that the strategies succeeded in achieving the desired policy reforms. In addition to this final outcome, GIS's lobbying also succeeded in attaining intermediate outcomes: increased attention; increased knowledge; and persuasion. Among others, the study's contributions are the following: it has explicated the overlooked conditions under which bureaucratic lobbying or influence is likely to occur; it has shown that lobbying impact should include not only final outcomes but also intermediate effects. Moreover, it has shown that politics-administration relations is a dynamic rather than a static category that is not explained by one best-practice model but rather a best-fit model or a combination of models that is contingent on factors producing changes in the relationship.

Keywords: *GIS, Bureaucratic lobbying, Strategies, Tactics, Support and Opposition, Outcomes*

Introduction

The idea of the politics-administration dichotomy where elected officials design policy and appointed officers implement the policy thus derived has long been challenged. There is now agreement in the literature that the bureaucracy influences policy-making not only at the implementation stage but also at the development and evaluation stages (Howlett and Ramesh 2003; Anderson 2006). For example, agencies initiate proposals for legislation in such countries as the US, UK and Australia. Agencies are not only sources of policy initiatives but they also lobby and otherwise seek to exert pressure for their adoption (Anderson 2006). This is made possible because of the technicality and complexity of many policy matters, the need for continuing control, and the legislators' lack of time and information. This has led to the delegation of much discretionary authority to appointed officials. As a result, the bureaucracy makes many decisions which have far-reaching political implications (Anderson 2006). In terms of the implication of this for Ghanaian policy-making, it is reported that for the first few months after the military National Liberation Council's coup of 1966 Ghana was virtually managed by civil servants, and this role expanded over time. Similarly, under the National Redemption Council military government (1972–1979), and the subsequent civilian government of the Progress Party (1969–1972), technocrats were drafted externally, including those who had worked with the World Bank and the IMF, onto the policy making terrain and were particularly influential in economic policy-making (Mohammed 2018). Likewise, although successive Ghanaian governments lambasted the bureaucracy for its inefficiency and ineffectiveness, they nonetheless found it indispensable in the overall governance process, particularly in policy-making (Mohammed 2018).

However, little is also known about the conditions under which bureaucratic agencies' lobbying or influence is likely to occur. Scholars from various research traditions acknowledge that bureaucrats are potentially influential players in the policy process (Bradley and Haselswerdt 2016). Bureaucrats have the ability to shape not only the actions of their outfits but also the legislation that approves and funds those programs and projects. As policy experts with valuable information, agency officials can influence the public agenda and the decisions that legislators make through direct advocacy or information sharing (Bradley and Haselswerdt 2016). For example, Howard (2001) evidences that in Australia senior bureaucrats within the federal Department of Social Security, who aptly were described as policy entrepreneurs, played an important role in promoting reforms which increased the generosity of the means test on unemployment payments. Similarly, in the US the influence of bureaucratic agencies is exemplified by the choice of most weapons system by the Department of Defense and the development of air-safety regulations by the Federal Aviation Agency (Anderson 2006).

Appointed officers can also exert influence on the legislature in an indirect fashion by leveraging the lobbying power of interest groups. This tactic, which Bradley and Haselswerdt (2016) describe as indirect bureaucratic lobbying, is employed by agencies in dodging legal or normative restrictions on bureaucratic lobbying and may increase the likelihood of realizing their preferred legislative outcomes (Bradley and Haselswerdt 2016, 2). There is no evidence of the systematic use of indirect bureaucratic lobbying. This study adopts the direct pathway to assessing the influence of the Ghana Immigration Service in the passing of the Ghana Immigration Service Act, 2016 (Act 908). This is because interest groups in Ghana are nascent, underdeveloped and less grounded in immigration issues to do the bidding for the GIS. Moreover, direct bureaucratic lobbying has not yet been the subject of a systematic investigation, either in the immigration service policy subfield or in general. This study contributes to the literature by: explicating the conditions under which bureaucratic lobbying takes place; arguing that political oversight is both an instrument of bureaucratic control and bureaucratic influence; establishing that lobbying outcomes consist of not only final outcomes but also intermediate outcomes; and revealing that politics-administration relations is a dynamic rather than a static category.

By adopting the direct pathway this article asks a number of questions, answers to which will ascertain the manner and extent to which bureaucratic agencies influence legislative policy decisions. These questions are: 1) Why is the adoption of a new immigration service law important? 2) Why is direct lobbying the preferred tool for getting the Immigration Service Bill passed into law? 3) What strategies and tactics are employed in lobbying the legislature and the executive into passing the bill? 4) How effective are these strategies and tactics? 5) What are the outcomes of the lobbying of the Ghana Immigration Service?

The study is organized such that after the introduction, part two expounds on three perspectives of bureaucratic lobbying, while part three adopts and explicates a theoretical framework which construes lobbying as a communication process. The fourth part gives a background of the Ghana Immigration Service. In the fifth part the methodology of the study is sketched, while the evidence of GIS's lobbying is presented in the sixth part. The final section is devoted to discussion and conclusion.

Perspectives on bureaucratic lobbying

Broadly, three perspectives on bureaucratic lobbying are discernible in the literature. These are the political-science perspective, the public-administration perspective, and the integrated perspective. These perspectives are reviewed in turn below in order to bring out their strengths and weaknesses and thus bridge their gaps so as to make them useful for guiding this study.

The political-science perspective on bureaucrats' influence on policy

The political-science perspective assumes that politicians are always superior in the hierarchical relationship between political and administrative executives. Thus, public administrators are subordinate to elected executives in both law and practice (Cook 2010, 276). Elected officials and administrators occupy separate spheres and have distinct roles and norms of behavior (Svara 2006, 954). In terms of policy-making functions, politicians decide on policies, while administrators implement those policies (Verschuere 2009, 23). Decisions on policy are to be taken by the political executives in parliament and government. Politicians and ministers are supposed to set the goals and determine the instruments of policy. The involvement of administrators is more limited in scope, including the bringing of facts to the policy process and the provision of policy advice. Appointed officers, as neutral specialists, are expected to advise and outline the pros and cons of alternative courses of action. They are expected to quietly cooperate with politicians whether they agree or not (Rashid 2014). Then, once a policy path is chosen by the political executives, bureaucrats are required to implement the policy and monitor the results. Therefore, their role is more supportive, providing important information and analysis for political actors. This view is based on the well-recognized "politics-administration dichotomy" or "separate-roles model", which proposes a clear distinction between politics and administration (Svara 2006, 956).

This perspective worries about the specter of bureaucratic dominance without political control. Such fears have variously been expressed as significance of bureaucrats' professionalization and resulting policy preferences (Ayee 2013), bureaucrats' purported desire to maximize the size of their agencies (Johnson 2016), and their possible capture by interest groups (World Bank 2004), among many other concerns. In order to deal with such fears, recent works have focused on understanding how politicians can overcome the information asymmetry inherent in the politician-bureaucrat relationship. Strands of this research include interpretive accounts and theoretical models of political controls (Johnson 2016), empirical investigations of bureaucratic response to political principals (Mohammed 2018) and studies of delegation to agencies (Huber and Shipan 2002). All these works accept that legislators, and other principals, should determine the direction and scope of bureaucratic activity.

Although these assumptions are reasonable they ignore the fact that relegating bureaucrats to the role of agents has also limited how most of these works conceptualize bureaucrats and their behavior. In particular, construing appointed officers as agents "reduces their actions to reactions and limits their political agency" thus, "leaving us with an underdeveloped sense of bureaucrats' power to shape both the legislature-bureaucracy dynamic and outcomes of the policy process" (Bradley 2014, 8). Despite the fact that politicians can use ex-ante control measures to direct bureaucratic behavior in preferred ways, this viewpoint overlooks appointed officers' ability to step out of their prescribed role. For example, works on procedural control of bureaucratic behavior, such as Klimenko and Zhulin (2009) and Shapiro and Guston (2006), tend to overlook the unwillingness of bureaucrats to wait until rule promulgation to

influence policy. This paper argues that bureaucrats are proactive and their influence starts much earlier in the proposal stage, right down to the legislative stage and beyond.

Public-administration perspective on bureaucratic activism

Academics that come from a public-administration perspective imbue bureaucrats with influence and autonomy. Examples of these influences in the policy process come from bureaucrats' contact with legislators and clientele groups (Bradley 2014); engagement in both direct legislative lobbying and indirect coalition lobbying with interest groups (Bradley and Haselswerdt 2016); manipulation of legislative principals to achieve mutual ends (Keiser 2001); lobbying both on behalf of the executive and their own interests (Baumgartner et al. 2001); mimicking behavior of private sector lobbyists (Thurlow 2016); devoting more time to policy development, originating legislation, building public support, contacting legislators, than spending time on administration (Bradley 2014); and influence over legislative outcomes is rare but is a reality when they demonstrate higher capacity or professionalism (Nicholson-Crotty and Miller 2012).

Undoubtedly, the public-administration perspective has challenged the view that bureaucrats are passive, reactive, or not involved in the policy process prior to the rules stage. Yet they overlook the fact that political controls have some effect on agency behavior (Bradley 2014). Politicians can often control administrators with the aim of substantially diminishing the "incorporation of independent professional contributions in policymaking" (Svara 2006, 955). Political control can also be expressed in the form of costs of attempting to influence legislative decision-making. These costs include the potential to anger principals, the opportunity cost involved in political activity, and the cost of spending political capital on a particular policy issue. By far the most important of these is the risk of angering principals, of being seen as insubordinate. This risk could accrue to either the agency as a whole or to the individual bureaucrat (Bradley 2014, 28).

Because this study focuses on bureaucrats' attempts to influence legislative and executive decisions, bureaucratic political engagement has the potential to anger either legislators or principals in the executive or both. Yet GIS bureaucrats were prepared to risk the anger of political principals by influencing the GIS policy in their preferred direction. But few public-administration studies acknowledge this fact. Rather the majority of studies subscribe to the view that agencies are essentially reactive bodies. By taking a principal-agent vantage, scholars in this camp argue that exerting influence on the legislative process is outside of bureaucrats' contractual bounds. The cardinal supposition in this literature is that legislatures influence agencies, not the other way around (Huber et al. 2001). Legislatures pass laws to direct bureaucratic activity; the degree and limits of agency policy authority are, theoretically, for legislators (and other principals) to determine (Huber and Shipan 2002).

The public-administration perspective also fails to consider the reality that bureaucrats may directly and unorthodoxly (proactively and using unusual tactics) seek to influence both the legislature and the executive if the policy affects their interest. This joins Poppelaars' (2009) view that agencies have reason to lobby for proposals they support. The propensity to lobby the executive is high in a political system that is characterized by the concentration of political power in the presidency (Ayee et al. 2011). The GIS chose to lobby the executive because in Ghana several factors have led to the overconcentration of power in the executive, and this has resulted in its dominance of the public-policy process. These include power of appointment; fusion of legislature and executive; president's power in financial matters;

president's subtle influence on the judiciary; and president's majority party (Ayee et al. 2011). For example, in terms of the president's majority party, executive power is exercised in Parliament through the president's majority party, of which he becomes leader by virtue of his position as president. The strong executive power gives the president strong influence on party politics and legislators. Because the success or failure of the president's policies affects the electoral fortunes of the party, the president's parliamentary party collectively and individually becomes a strong advocate of his policies and programs. All party-based representative democracies have elements of party loyalty. What may be observed in Ghana, however, is that the system allows the president, as an individual, exceptionally strong influence (Ayee et al. 2011).

Bureaucrats also attempt to influence legislative decision-making in at least two important ways. First, bureaucratic heads, that is principal secretaries, must provide technical and policy information in response to legislators' request for policy advice. Contingent on the wording of the advice presented, bureaucrats can influence legislative thinking even while maintaining a reactive stance (Bradley 2014). Second, bureaucrats can engage proactively in legislative decision-making, in either of two ways: they can use their personal connections to legislators and legislative staff to lobby directly, or they may ask interest groups for lobbying help (Bradley 2014). This article focuses on the former which is called "direct bureaucratic lobbying". Lobbying is an underdeveloped activity in the policy process in Ghana, and bureaucratic lobbying is even acutely underdeveloped. Moreover, to the author's knowledge, direct bureaucratic lobbying has not yet been the subject of a systematic investigation, either in the immigration service policy arena or in general. This study is therefore a modest attempt at addressing this gap.

Integrating the Legislator-and Agency-Based Perspectives

The integrative perspective recognizes that the interface between civil servants and politicians imbues both actors with power in the policy-making process. One of the insightful works that integrates the political-science and public-administration perspectives discussed above is Krause's (1996) dynamic-systems model of bureaucrat-politician relations. Theoretically and empirically, and focusing on the interplay between administrative outputs and politicians' budgetary signals, Krause found politicians and bureaucrats as roughly equal players in the policy process.

Carpenter's (2001) research is another in the integrative perspective that examined sources of agency autonomy during the Progressive Era. Carpenter demonstrates that certain administrative agencies have developed the reputation for expertise which they employ to locate themselves in sundry political networks that serve as a source of power. Autonomous agencies build support coalitions that politicians are reluctant to challenge; instead, politicians defer to the expertise of those agencies. Carpenter's view on the efficacy of bureaucratic expertise is insightful for this study because it features in the repertoire of instruments the GIS used in influencing the GIS policy. The Ministry of Interior has oversight responsibility for the GIS, and the latter sees political oversight not only as control of bureaucratic behavior but also as a means for agency officials to use their informational advantage and expertise to influence policy.

Several empirical studies advance facets of Carpenter's theory. These embrace research on the effects of agency autonomy on innovation (Verhoest et al. 2014) and on the impacts of agencies' concern for their reputations on their attempts to seek publicity (Moffitt 2010),

to improve customer service (Corrêa d'Almeida and Klingner 2008), or to deliver high-quality policy advice (Krause and Douglas 2005). Alcañiz (2010) examines bureaucrats' network formation in technical agencies in Latin America, but limits these networks to trans-governmental linkages with other expert bureaucrats. Meanwhile Nicholson-Crotty and Miller (2012) investigate how agency reputation conditions the ability of state-level bureaucrats to influence legislators. The integrative perspective is akin to Svava's (2006) overlapping roles and complementary models and Dasandi and Esteve's (2017) collaborative model. These models highlight the shared influence of politicians and bureaucrats. They envision governments as cooperative relationships between officials who reflect distinct values and perspectives (Svava 2006).

A re-appraisal of the models

The models that have been discussed here are based on two dimensions along which the relationship between politicians and administrators can be conceptualized: separation and autonomy – following Svava (2006). Separation denotes the extent to which the political and administrative realms are distinct. Autonomy means the extent to which bureaucrats have the space or freedom to go about performing functions they are assigned without political interference (Rashid 2014). It is argued here that although each one of the models explicated above, which either center on separation or autonomy or a combination of the two, captures a certain dimension of reality about politics-administration relations, none fully explains the whole picture. This is especially so in developing countries, where the institutional and governance structures differ from those of advanced industrialized nations. In developing countries, literature is expanding on the process of reform, highlighting the importance of politics-administration interactions in reform processes (Andrews 2013). This research points to the extent to which the politics-administration relationship in many developing countries differs from the Weberian ideal. Besides, it highlights the huge dissimilarities in the nature of the politics-administration interface across developing countries. The civil service in some developing countries "has power rivaling that of the political establishment" (Grindle and Thomas 1991, 60-61), while in others, governance is mired by the absence of a coherent bureaucracy (Evans 1992). In such scenarios, the Weberian model does not resemble the realities of politics-bureaucracy relations (Dasandi and Esteve 2017).

It is in the light of this reality of the politics-bureaucracy interface in the Third World that this paper argues that there is no best-practice model of politics-administration relations in that region. Rather it is contended that the elements of the different models that are relevant to a particular context or decision process are usually combined with local nuances to co-act to produce a best-fit model. It also claims that although proponents insist on the explanatory power of their models, almost all of them are silent on whether politics-administration relations is a static or a dynamic category. Examples of the few exceptions are Krause's (1996) and Dasandi and Esteve's (2017). But they too are mute on how changes in politics-administration relations in particular contexts actually occur and the dynamics of the factors that cause changes in the relations. They are also quiet on how these factors interact and which of them has more explanatory power in a specific jurisdiction or specific episode of interaction. Static situations are fairly predictable over time compared to dynamic phenomena. But since real-world phenomena are hardly static, it means politics-administration relations continually changes. This paper makes a contribution to the literature by focusing on the dynamic nature of the politics-bureaucracy relations in Ghana as a developing context. It does this by investigating how changes in the politics-administration relations occur as a function of the recurrently shifting interests of politicians and bureaucrats; power structure; information

asymmetry; salience of issues; and strategies and tactics of interaction.

The interests of politicians and bureaucrats (personal, professional and organizational) in a particular policy issue will determine the type of relations that will develop between them. Where there is interest convergence there is a tendency for reciprocal exchanges between the two categories of officers, and the relationship that will develop will look more like the complementarity model. On the other hand, where there is interest divergence the political actor tends to exert control, making sure its interests override those of the bureaucrat. Accordingly, the relationship shifts and becomes the separate-role model. Further, where the interests of some political actors converge with those of bureaucrats while those of some other politicians diverge from them, an overlapping model emerges – where a combination of the separate and responsive models operate. As the interests of the parties shift so will the relations between them shift accordingly. This means the latitude of the politics-administration interactions could be dotted with spells or episodes of control or adversarial and reciprocal or cooperative relations for any given period of time. This dynamics in the politics-administration relations is hardly, if ever, recognized in the literature.

In respect of the salience of issues, citizens who care about an issue are especially likely to take elected officials' actions on that issue into account on Election Day (Ansolabehere and Sorocco 2015). This makes politicians responsive to highly salient issues. High political salience may lead to increased political control, thereby increasing the interaction between the spheres. So immigration service being a salient security service, especially in the era of global security threats like terrorism, has increased interaction between GIS, and the Minister of Interior and legislators.

In regard to power structure, most African countries have witnessed (some still do) the crisis of political turmoil, intolerance and harsh dictatorship; others have a military regime or imperial presidency with highly centralized government processes. To name a few, Sudan, Zimbabwe, Libya, and Uganda are in dire straits, resulting in a marked degree of social disintegration and economic stress throughout the continent. In this scenario of authoritarian ideology, public administration merely administers commandments and decrees (Vyas-Doorgapersad 2011, 238). Even in the current democratic dispensation most African governments are still characterized by executive dominance of governmental power (Prempeh 2008). In such a climate the bureaucracy defers to the executive, and this makes bureaucrats passive suppliers of policy advice as in the separation model (Rashid 2014).

In reference to information, there is a fundamental asymmetry in experience and specialized knowledge that undermines the formal principal-agent relationship between the elected principal and the administrative agent (Johnson 2016). Public-choice theorists argue that administrators act in terms of their own interests or their own perception of the public interest rather than the public interest as translated by elected officials (Johnson 2016). Carpenter (2001) claims that bureaucrats have earned a reputation for expertise, which represents a source of power. Thus, the politician defers to the former because of his expertise and reputation – mimicking the autonomous administrator model (Svara 2006). The information asymmetry between politicians and bureaucrats that arises from bureaucratic expertise has been the subject of considerable attention (Moe 2006). Expertise represents the key source of power for administrators and can be the cause of conflict between them and politicians – a conflict between hierarchy and expertise. This is particularly true in developing countries that have been grouped into Dasandi and Esteve's (2017) intrusive model where bureaucrats are "often said to monopolize the knowledge and expertise relevant to government" (Smith 2009, 135). Thus, expertise gives bureaucrats an urge or influence in the policy process. Nevertheless,

politicians also have knowledge of the broader political context and specific policy issues, which they use to shape their interaction with bureaucrats. Chung (1989) concurs when he argues that the influence of presidents and bureaucrats in South Korea's decision-making process depended largely on the extent of the president's knowledge of a specific issue.

The communication process as a framework of lobbying

This study adopts a framework which views lobbying as a communication process. In this process a messenger (usually an interest group or untypically a bureaucratic agency) transmits a message to a receiver (policy makers) via a medium, within a given context and with a certain effect (Bruycker 2014). Viewing lobbying as a communication process permits its examination as a sequential process in which the use of different tactics are interrelated (Bruycker 2014).

The messenger characteristics influence the type of tactics and their interrelationship in affecting lobbying. The characteristics include organizational resources; the type of constituencies represented; and forged alliances. For example, being part of a coalition has several advantages: group accessibility to a wider range of policy makers; accessibility to more exclusive lobbying channels and policy makers; lobbyists' ability to draw from the same pool of arguments and information when approaching policy makers; ability to cover a wider array of lobbying tactics; and ability to mobilize the resources (like information, language skills, and networks) of the other coalition members (Bruycker 2014).

The second component of the lobbying communication process is the lobbying message. A lobbying message refers to the content the lobbyist communicates to policy makers. The lobbyist may strategically include or exclude specific issues, information and arguments in their message. However, the role and nature of the lobbying message varies depending on the interaction mode that is employed. There are three modes of interaction: information exchange (which aims at gaining access to decision makers and influencing them); arguing (which seeks to change policy makers' mind about what they think is right); and agenda setting (which signals which issues are important and need to be dealt with) (Jones and Baumgartner 2005; Klüver 2013).

The third component of the lobbying communication process is the channel – the medium through which the message is conveyed to policy makers. There are two kinds of channels, namely public and private. The content of the message is affected by whether a public or private channel is used. A private channel provides for direct transmission with sufficient details to policy makers. A public channel, on the other hand, concedes to journalistic routines and standards for news values and thus sacrifices sophistication, technical nature and detail of message (Bruycker 2014, 9-10).

The fourth component of the lobbying communication process is the target. A target can, for instance, be a policy venue, such as an institution or a group in society which has the authority to make decisions concerning an issue (Baumgartner and Jones 2015, 31). Three types of targets are identifiable: friendly policy makers who help to represent the lobbyist's case on the basis of information and arguments received; "fence sitters" or legislators who are undecided; and policy makers who oppose their view in order to persuade them to vote differently (Hall and Daerdorff 2006). In practice, lobbyists lobby both allies and opponents (Braun 2012). A persuasive mode of lobbying is suited for opponents because they can adjust their arguments to, for example, take account of political ideology. The agenda-setting mode

is suited for both allies and opponents because their attention needs to be drawn before they can be informed or persuaded (Bruycker 2014).

The final component of the lobbying communication process is the effect or outcome of lobbying. Lobbying success is usually seen as the extent to which lobbyists influence public-policy decisions. Usually this is measured by legislative outcomes (Dür 2008). However, this approach ignores outcomes at the intermediate level connected to the three modes of lobbying interaction: increased attention; increased knowledge; and persuasion.

First, in the agenda-setting mode lobbyists strive to increase the attention policy makers give to specific issues and mobilize them and other stakeholders to advance their cause. Second, in the informing mode lobbyists inform policy makers and expect certain policy outcomes in return. Policy makers learn and gain knowledge given by lobbyists, while the latter anticipates that this will translate into the desired outcome at the level of policy outcomes. The third mode, arguing, is aimed at persuading policy makers to generate favorable policy outcomes (Bruycker 2014, 13).

All these lobbying modes can influence policy outcomes, yet the underlying mechanisms that spark influence may differ. Thus, lobbying success is mediated through communication effects situated at the level of policy makers. These "communication effects are, in other words, an important intermediate step between lobbying communication and lobbying success" (Bruycker 2014, 13). For example, although a lobbyist may not have been successful in influencing policy outcome he nonetheless succeeds in drawing attention to a certain issue. For repeat players this means that an intermediate success at a previous episode can affect lobbying success at future engagements (Lowery 2013, 13). So studying this intermediate success is critical to ultimately influencing policy making.

Methodology

A case-study design was used to investigate the influence that the Ghana Immigration Service (GIS) had on the Legislature in the consideration and passage of the Immigration Service Act, 2016 (Act 908). The empirical basis of the study are interviews with 70 respondents made up of 60 officials from the GIS and 10 legislators. The GIS officials were chosen because of their roles connected to the development and implementation of the Immigration Service Act, 2016. The respondents included 10 from senior management, 25 from middle management and 25 from junior management. This stratified sampling method enabled the solicitation of the views of senior, middle and junior managers. The 10 members of parliament included members of the Defense and Interior Committee reflecting the political divide. The primary information was complemented by secondary evidence.

The GIS was chosen for a number of reasons, first a number of trends have made immigration issues and problems more salient now than ever. The September 11 2001 terrorist attack in the US; mobility changes in the world; the ease in the movement of people, particularly investors; and the trans-nationalization of crime have prompted governments across the globe to begin to pay serious attention to migration issues. Accordingly, Ghana has to adopt the most robust, sound and dynamic legal frameworks and policies for immigration. This study will therefore contribute to such an endeavor. Second, the actions, commissions and omissions of the GIS have implications for both domestic and international security, investments and employment, as well as bilateral and multilateral relations. So studying the GIS will inform policy reforms that will improve these dimensions of national development. Finally, the roles

and responsibilities of the GIS are ubiquitous, spanning the length and breadth of the country. Understanding the nature and scope of such a broad mandate is the key to effectively carrying it out. Moreover, carrying out such a huge mandate implies that different strategies and tactics need to be devised to address the unique issues and problems pertaining to particular contexts. This study can be a starting point to unearthing what the appropriate strategies and tactics might be.

GIS's lobbying for the passage of the Immigration Service Act, 2016

The presentation of the evidence on GIS's lobbying of the legislature and the executive in the enactment of the Immigration Service Act, 2016 (Act 908) is done under a number of themes. These include: the need for a new GIS law; direct lobbying as a preferred tool of influence; strategies and tactics of lobbying; efficacy of lobbying strategies; and outcomes of lobbying.

Need for a new GIS law

The promulgation of the Ghana Immigration Service Act, 2016 (Act 908) was prompted by the inadequacies inherent in the previous laws: Provincial National Defense Council (PNDC) Law 226 of 1989 and the Immigration Service Act, 2000 (Act 573). According to a respondent senior manager, "the shortcomings of the previous laws included: the lack of power to bear arms to protect the country's territorial borders (which exposed the country to illegal migration with its attendant security threats)." An informant from the junior management of GIS agreed, arguing that, "we are on the ground at the entry points to the country and I can tell you that the absence of power to make arrests feeds illegal migration and emboldens illegal migrants to enter the country." An interviewee from middle management added her voice, saying that "the existing GIS arrangements have limited operational structures, which prevent the effective discharge of the organization's mandate." She added, "we need additional departments, organizational restructuring and pay and grading reclassification, which can only be done by a new law." Other reasons for a new GIS law included: the organizational structure and the associated grading system of the GIS, which are inconsistent with international best practice and analogous Ghanaian security agencies like the Armed Forces and the Prison Service, which debased the status of the GIS; the usurpation by the Ministry of Foreign Affairs of GIS's power to post personnel to serve as consular officers in foreign missions, which led to a conflicting oversight mandate of GIS between the Ministry of Interior and Ministry of Foreign Affairs; and the existing designation of Board of Directors for the GIS instead of a Council whose policy-making powers are circumscribed.

Direct lobbying as a preferred tool of influence

According to a majority of 83 percent of the respondents, direct lobbying was the most popular way of lobbying. When asked to explain why they thought direct lobbying was the preferred way to influence political decisions, one Commissioner of Immigration elucidated that "associational life in Ghana is nascent and underdeveloped and therefore getting a credible interest group to do the bidding on behalf of the GIS was very difficult." On his part an Assistant Commissioner of Immigration argued that "we had to engage in direct lobbying because the matter was of great interest to us both personally and professionally." Personally, he said "our livelihoods, our career progression, and our prestige were all at stake because the old law circumscribed all these aspirations." Professionally, he averred, "the old

law circumscribed our power to do many things, for example to make arrest and to bear fire arms, and without these powers I wonder how we can effectively discharge our expanding and complex mandate." He concluded that "no other person or group understands or can explain these matters better than GIS itself to policy makers, and that is why we decided to lobby directly."

A Senior Inspector of Immigration argued that direct lobbying was preferred because "it was the most effective way of building relationships with elected officials and educating them." He said, "if we even had a credible interest group to lobby on our behalf, they and not the GIS staff would have made the personal contacts with legislators." They would have also made "the personal phone calls and physical conversations with secretaries and personal aides, and the business meetings with the decision makers." All these interactions we had with the political executives and legislators, he added, "helped us build familiarity with them, and influenced their decisions." These opportunities, he concluded, "would have remained foreclosed had we allowed interest groups to do the lobbying on our behalf."

Respondents were asked why they decided to lobby both the legislature and the executive. In response, one Commissioner of Immigration intimated that "since the inception of the fourth republic in 1993 Ghana has been operating a majoritarian parliament." In such a system, he explained, "the legislature defers to the executive enabling the latter to have an urge in the policy making process." A responding legislator agreed, arguing that "because the success or failure of the president's policies affects the electoral fortunes of the party, the president's parliamentary party collectively and individually becomes a strong advocate of his policies and programs." Another responding member of parliament expanded that "because the President is required to appoint the majority of his ministers from parliament, legislators who do not have a ministerial portfolio yet are more inclined to favor the executive." Nevertheless, votes of opposition legislators were also critical to winning Parliament's approval of the GIS law.

Strategies and tactics of lobbying

The respondents said different strategies and tactics were used by the GIS to influence policy. These included meetings with relevant parliamentary committees and individual legislators, special briefs with influential and outspoken legislators across the political divide, phone calls made by senior management to individual legislators, seminars and workshops as well as discussions on media platforms such as TV. In addition to these, a Commissioner of Immigration intimated that "the Head of GIS held meetings with the chairperson and ranking members of the Defense and Interior Committee of Parliament." These meetings, he iterated, "afforded the opportunity for the GIS boss to not only educate them on the new and arduous mandate of the GIS" but also the "powers that it requires, the tools and equipment it needs, and the training and development and motivation it demands to intervene effectively in relation to immigration service delivery." A Senior Immigration Officer also said that, "there were one-on-one interactions of some senior members of GIS with legislators at the lobby of Parliament on the day of voting on the Immigration Service Bill." A deputy Commissioner of Immigration moreover intimated that "good rapport was established between the GIS and some of the personal aides and secretaries of parliament." This, he said, "facilitated quick access to the legislators, allowed for quick rescheduling of meetings that could not be held for genuine reasons, and permitted furnishing of updates on the bill which informed GIS's strategizing."

The Ministry of Interior has oversight responsibility of the GIS, and the latter saw this control arrangement also as an opportunity to influence the former to support the GIS bill. This view is reflected in the comments of one Commissioner of Immigration that:

We ceased the opportunity granted by our encounters with the Minister to not only speak truth to power about our challenges but also articulate same cogently into an agenda for legislative and policy reforms which the Minister accepted.

Another respondent said, "during our several meetings and encounters with the Minister he reiterated he would crack the whip where necessary to ensure that officers who are under-performing and those who are acting unprofessionally are brought into line." He added, 'but the meetings also gave us an opportunity to educate the Minister about immigration issues and the appropriate legal, logistic and economic as well as administrative frameworks we need to effectively discharge our mandate.' An Assistant Inspector of Immigration added that "it was during this education process that we succeeded in convincing the Minister to support the GIS Bill which was coming up for a decision in parliament." Another respondent said we educated the Minister to understand that "contemporary immigration issues and problems are complex and therefore demand a multi-pronged approach to their resolution." One of the solutions, the minister was told, "is to adopt a new GIS Law that will sufficiently empower the agency to bear arms to accost illegal immigrants", and that will enable it to "combat crime, expand services, and professionalize the service as well as motivate staff and adopt international best practice."

Effectiveness of the strategies and tactics

In terms of meetings, a strategic workshop was organized for members of the Defense and Interior Committee of Parliament in Accra. This committee was responsible for deliberating on the Immigration Service Bill and making recommendations to the full house. It was therefore imperative for the GIS to win their support for the bill. Prepared materials explaining the present challenges and inadequacies of the GIS, measures for dealing with the problems and the rationale for the new Immigration Bill, were presented to them. For example, one resource person of the GIS explained that "the GIS had a circumscribed mandate which was making it difficult to deal effectively with contemporary immigration issues." Another elucidated that "in this contemporary time a new approach to immigration that takes into account the global patterns of both regular and irregular migration and the increasingly sophisticated methods of identity fraud and abuse of immigration laws was critical." Yet, he explained, "it is quite formidable for the GIS to rise to the challenge because the existing law does not allow it to use arms and make arrests, especially in border patrolling." A third resource person added that, "GIS does not have cooperation agreements with other Immigration departments in other jurisdictions for information sharing." Nevertheless, he bemoaned, "border security and border management are significantly enhanced by cooperation and collaboration, as well as the use of reasonable force to accost criminals and illegal migrants." A fourth resource person revealed that, "a similar workshop was also held in Koforidua to clear outstanding issues, strengthen arguments already made and to build more support for the new Immigration Service Bill."

The general consensus among respondent members of parliament was that the workshops were educative and built a solid rationale for the new bill. For example, one Member of Parliament (MP) said, "I did not know that Ghana has as many as 43 formal borders and myriad unapproved entry routes into the country." He added, "undoubtedly it should be a

herculean task to police these borders without the power of immigration officers to bear arms and country vehicles for effective coverage." A second respondent MP averred, "I learned from the workshops that immigration laws are important to protect the health and safety of Ghanaians, to maintain the security of its society, and to promote international justice and security by refusing access to its territory to persons who are criminals or security risks." A third MP affirmed that from the workshops he gathered that "greater cooperation through the exchange of information between the GIS and counterpart agencies in other jurisdictions can make the actions of cooperating countries in achieving service objectives more effective."

According to a Deputy Commissioner of Immigration, "the special briefs with most influential and outspoken MPs did the trick of persuading them to support the bill." This, he said, "is because the briefs gave them simplified, cogent and concise as well as abridged arguments for why a new immigration service bill was warranted." Equipped with the relevant information, as the special briefs afforded, "MPs rehearsed and presented eloquently on the floor of Parliament without difficulty reasons for why a new immigration law was warranted."

According to the GIS respondents the phone calls made by senior immigration officers to ranking members of the Defense and Interior Committee and other influential MPs helped build familiarity of agency officials with the legislators. As one Senior Inspector of Immigration revealed, "it also helped to explain the issues comprehensively in private to the MPs and address their reservations which they did not feel comfortable to express at the workshops." He added, "these afforded the opportunity for friendly but frank discussions of issues, particularly those on which support was difficult to garner." Another GIS respondent agreed, acknowledging that "it was initially difficult convincing sympathizers of the Minister of Foreign Affairs, who was also an MP but did not support the bill." He added, "she did not support it because the bill proposed hiving off consular services from the mandate of her outfit and placing same under the GIS." He said further that "this potentially meant losing prestige and budget, which she could not come to terms with." He concluded that "the phone calls therefore individualized, privatized and de-formalized the conversation which the workshops and special briefs could not do." A Deputy Commissioner could not agree more when he intimated that "ultimately, the phone calls succeeded in convincing those who were originally opposed to the bill to support it." Thus, he added, "the phone calls were a tactic to turn opposing MPs into supporters, supporters into champions and undecided MPs into backers."

A Commissioner of Immigration said that "the meetings the Head of GIS held with the chairman and ranking members of the Defense and Interior Committee psychologically signaled the importance of the Immigration Service Bill." One MP commented that "if the head of the GIS has taken it upon himself to organize meetings with MPs to persuade us to support the bill", then "it means the needed reforms contained in the bill must be ones that will make his outfit to discharge its mandate efficiently and effectively." He concluded "that is why my colleagues and I supported the passage of the bill."

The good relationship that agency officials established with personal aides and secretaries was important. This, according to one Immigration Officer, "is because it enabled the sourcing of information to enable the GIS to determine who the target of their lobbying activities should be." He said further that "without the good rapport with personal aides and secretaries that information would have remained inaccessible." The good relationship with personal aides and secretaries, another GIS respondent argued, "is an asset for repeat players because of the familiarity and informational advantage it will afford them over opposing lobbyists to their stand."

Outcomes of GIS's lobbying

The effects of the GIS's lobbying are twofold: final outcome; and intermediate effects. The final outcome refers to the influence of GIS on legislators and the political executive in passing a new immigration law. The implication of passing of the GIS Bill into law, as a respondent legislator argued, meant "the hiving off of counselor duties from the mandate of the Ministry of Foreign Affairs and placing those under the Ministry of Interior; the granting of power to immigration officers to bear arms; changing the grading and ranking structure of the GIS; the establishment of the Immigration Service Council with more powers than the erstwhile Immigration Service Board; and the establishment of new functional units."

In terms of influence on legislation, GIS lobbying, according to a Commissioner of Immigration, "canvassed support among legislators across the political divide for the bill." This is highly unusual in a country that is profoundly polarized along party lines. The division typically is such that no matter the merits of an issue before the House, Government Party legislators and their Opposition Party colleagues always appear on different sides of a coin (Oquaye 2000). Not surprisingly, the unusual consensus across the political divide on the Immigration Service Bill enabled it to be passed into law – the Immigration Service Act, 2016 (Act 906).

As noted earlier, a number of benefits attended the passing of the Immigration Service Bill into law. First is the bearing of fire arms, in reference to which a respondent immigration officer said, "the new law has not only empowered the GIS staff to wield arms but it has also specified the variety of arms they can use." GIS respondents said the types of fire arms the GIS staff can bear under the new law include a gun, rifle, machine gun, cap gun, flintlock gun or pistol revolver, canon or any other fire arm and an air gun. The rest are air rifles or air pistols, whether whole or in detached pieces. The power to bear fire arms and make arrests, a senior management respondent of GIS said, "has repositioned the GIS to respond to current threats such as the Asian onslaught." The new law, another respondent said, "has now better prepared the GIS for stringent checking of who actually enters Ghana in order to ensure that criminals and other undesirable elements are denied entry." A third interview intimated that "the power to bear arms and make arrests has elevated the status of GIS to a law enforcement agency which is now in line with trade and investment policies of the government."

Second, pertaining to the changed ranking system, a Commissioner of Immigration said, "hitherto the head of the GIS was ranked *Director of Immigration*, which was a lower position compared to analogous positions in the other security agencies like the armed forces and the police service." A respondent Inspector of Immigration elucidated further, bemoaning that, "whenever there was a state function it was difficult placing the Director of Immigration among the heads of the security agencies." The new law, he was delighted to say, "has elevated the head of GIS to a Comptroller General, which is in line with the ranking in the other security agencies and international best practice." Another respondent added that, "the remuneration and fringe benefits as well as other terms and conditions of service associated with the new elevated rank of the Head of the GIS and all ranks below it have been enhanced." Thus, he concluded, "the new law has improved the incentive structure of the GIS, which human resource management scholars have argued is critical to achieving a high employee retention rate in organizations."

Third, in relation to the establishment of the Immigration Service Council, the new law has substituted the existing Board of GIS with the GIS Council. The council has more powers than the erstwhile board. For example, the new law has empowered the council to "make recommendation to the Minister on bilateral and multilateral co-operation with foreign

countries in matters relating to migration and related issues" (Ghana Government 2016, 3). This power was not available under the old laws – The Immigration Service Act, 1989 (PNDC Law 226) and the Immigration Service Act, 2000 (Act 573).

Finally, in reference to the establishment of new functional units, one Deputy Commissioner of Immigration said, "the new law has expanded the operational structures of the GIS by setting up more departments, sections and units to support the three existing directorates." The three existing directorates are Finance and Administration Directorate; Legal, Research and Monitoring Directorate; and Command Post and Operations Directorate. The new departments, divisions and units in the new GIS structures, an Assistant Inspector of Immigration Officer revealed, are, "a Border Patrol Unit, Document Fraud Expertise Center, and a Migration Management Bureau". He agreed that "the establishment of the new departments has better positioned the GIS to respond to the changing trends in the delivery of immigration services, especially the global rise in terrorist."

The intermediate level effects of GIS's lobbying are connected to three modes of lobbying interaction: increased attention; increased knowledge; and persuasion. In these regards, the GIS succeeded in increasing attention to immigration issues and increasing the knowledge of the Minister of Interior and legislators about immigration issues, particularly those relating to the intricate global environment in which the agency must now function. In addition, it persuaded all categories of policy makers: supporters, undecided minds and opponents of the bill to vote for it. Moreover, the experience it gained in this particular lobbying episode has become an asset for it to intervene most effectively in relation to future lobbying episodes.

Discussion

This study conceived GIS's lobbying as a communication process. As a communication process lobbying had a messenger, that is the GIS, which acted as a single advocate rather than in coalition with other like-minded agencies or interest groups. The literature posits that as messengers of lobbying communication, interest groups can give more traction to their demands by forging alliances with other like-minded stakeholders (Servaes and Malikhao 2012). Contrary to the literature, the GIS solely carried out the lobbying and succeeded in influencing the passage of the Immigration Service Bill into law. This suggests that coalition-building may not necessarily be the most effective or appropriate strategy in influencing policy in all situations or may even be inaccessible or unavailable. As in the case of lobbying for the passage of the Immigration Service Bill, there were no like-minded advocates with whom the GIS could coalesce, and that is why it adopted what Bruycker (2014) called a direct lobbying strategy.

In terms of locating the direct lobbying of GIS within the three perspectives of bureaucratic lobbying explicated earlier, the public-administration perspective best describes this behavior. This is because GIS was proactive in exercising agency in terms of the initiation of the policy, the canvassing of support for the proposal across the political divide, and the education of decision makers about immigration issue, as well as the persuasion of minds through phone calls, and the convincing of legislators in the lobby of parliament and at the workshops and seminars. This evidence ties in with Bradley's (2014) view that bureaucrats allocate substantial resources to policy development, originating legislation, building public support, contacting legislators, and other activities that might be considered political. But it undercuts the political science perspective's claim that public administrators are passive, reactive, or not involved in the policy process prior to the rules stage (Bradley 2014). In other

words, GIS's agency in influencing the adoption of a new immigration law challenges the view that the bureaucrat's role is limited to bringing facts to the policy process, providing of policy advice, and quietly cooperating with politicians whether they like a proposed policy or not (Svara 2006; Rashid 2014).

Nevertheless, the GIS had the receptive ear and support of politicians because of the salience immigration issues have assumed in the changed global environment. Today, the threat of terrorism is closer to home than ever for all countries, and the role of GIS in identifying, tracking and preventing criminals from entering Ghana is acknowledged. The good reception and approval GIS received for its immigration service policy reform proposals from politicians are unlikely to occur to the same extent, if at all, for its other issues or those of other bureaucratic agencies. Moreover, there is no guarantee that in the future even those very GIS issues that currently have received approval will continue to have the same level of support, if at all, of politicians because the salience of the issues will not remain the same. Accordingly, the engagement of politicians and bureaucrats with each other in relation to these issues may change in the future.

In line with lobbying as a communication process, GIS also had a message which it eloquently articulated in a simple, comprehensible and concise manner to policy decision makers. The content of the message gave justification for a new Immigration Service law on grounds of economics, investment, and security as well as tourism, law enforcement, and synchronization of policies. The interaction modes for conveying the message to decision makers were also carefully chosen by the GIS and embraced the three categories identified in the literature. These interaction modes included information exchange, argument, and agenda-setting. In its encounters with the Minister of Interior, agenda-setting had preponderance in application and was followed by information exchange. This is because the GIS first had to convince the Minister of the salience of the proposed Immigration Service reforms in order for him to accept it as one of his agenda items at cabinet meetings. This is in line with the belief of some writers, who argue that lobbyists first have to communicate the importance of policy issues to policy makers for the issues to get placement on the government agenda (Jones and Baumgartner 2005). The information exchange mode contained the justification for the new law, which the GIS very well enunciated in the message. This gave GIS management access to cabinet sessions whenever the Minister of Interior felt the need for them to furnish details or buttress points. This evidence supports the view that lobbyists give information to policy makers in return for access to the corridors of power or influence (Klüver 2013).

It also reflects information asymmetry, where bureaucrats are "often said to monopolize the knowledge and expertise relevant to government" (Smith 2009, 135). With its informational advantage, GIS was able to influence the passing of the Immigration Service Bill into law. It did this by highlighting: the increasingly complex and difficult environment in which it must now operate; the expanding scope of the mandate it must now grapple with; the upgrade and revision it must make to its training curricular; the motivation it must give to its staff; the level of automation of processes, procedures and techniques it must introduce; the emphasis it must put on the interconnectedness between immigration services and security, investment, tourism, employment and diplomatic relations; and the collaborations it must forge with sister agencies across the world, particularly developing countries. Olsen (2007) believes that although expertise is a key basis of power for bureaucracies it can also be at the root of conflict between politicians and bureaucrats – a conflict between hierarchy and expertise. In this case, however, the informational resources GIS gave to politicians did not become a source of conflict between hierarchy and expertise, it rather became a tool for the two spheres to interact more intensely and cooperatively. This evidence has helped towards filling

the lacuna in the literature that "the precise nature of the relationship between bureaucratic expertise and political-bureaucratic interactions is somewhat unclear" (Dasandi and Esteve 2017, 239).

Apart from the Minister of Interior the GIS also lobbied legislators. The interaction mechanisms the GIS used for the legislative decision makers included workshops organized for members of the Defense and Interior Committee of Parliament, special briefs, one-on-one encounters of senior management with legislators and personal phone calls. These interaction tactics involved all the three interaction modes either applied separately or simultaneously. All the interaction types named above can be described as private channels of communication because the public and the media were not invited. Neither the proceedings nor the outcomes of the workshops, special briefs and other interaction arrangements were advertised or made available for public consumption. According to Bruycker (2014) this manner of lobbying guarantees a certain degree of discretion, where the contact between policy makers and interest groups or lobbyists is transacted in private. It also afforded the GIS the opportunity to furnish detailed and technical information that pertained to the Immigration Service Bill. This contrasts with public lobbying (also known as outside lobbying), where the lobbying message attracts public attention, concedes to journalistic practices and standards deemed apt for news reporting (Bruycker 2014). Thus expert reports are readily circulated and shared through direct (private) communication channels rather than public (Beyers 2008).

The extraordinary mode of lobbying strategies which GIS employed especially in organizing workshops and seminars outside Accra, the national capital at Koforidua, and getting legislators to attend was a hyper activity beyond the level anticipated by the public-administration perspective. This is because it defied all three types of risks anticipated for bureaucrats to incur in an attempt to lobby political decision makers. The greatest of these risks or costs was the potential to anger legislators, which the GIS was prepared to incur. As neutral advisors, few, if any, bureaucrats are prepared to be that assertive on their political principals, as this can be misconstrued as insubordination. So to the extent that the GIS could reveal its preferred policy position to political principals and went beyond that to invite them to meetings outside the seat of government in Koforidua purposely to make them think differently, to influence their decisions, to let them select the agenda or issues that GIS thought was important, smacks of bureaucratic autonomy. These GIS machinations did not generate disagreement between bureaucrats and politicians. Rather its tactics brought politicians and bureaucrats closer together and made them interact intensely and cooperatively and thereby built consensus. This contradicts the political control of bureaucratic behavior literature that posits that legislatures influence agencies, not the other way around (Kim 2008).

In terms of the target in the lobbying communication process, GIS's lobbying was directed at all categories of policy decision makers: friendly ministers and parliamentarians, undecided legislators, and opposing law makers. For example, the workshops did not discriminate among legislators in terms of their initial stand on the Immigration Service Bill. The arguments presented by resource persons and prepared materials the legislators were supplied with cogently explained the merits of the new law, which persuaded the opponents of the bill. The arguments also succeeded in winning the support of the undecided MPs, while also strengthening the resolve of those MPs who had already pledged their support. This strategy is consistent with the view of several scholars who argue that in practice, lobbyists lobby both allies and opponents (Braun 2012).

However, GIS's strategy departs from those who think that lobbying represents an exchange wherein lobbyists furnish information and arguments to friendly policy makers only so that they could champion their cause (Hall and Daerhoff 2006). The GIS's strategy is also incongruent with others who contend that the target of lobbying should be undecided policy makers (Hall and Reynolds 2012). Yet still it is largely at variance with those who believe that lobbyists should chiefly aim at policy makers who oppose their position so they can persuade them to vote differently (Schnakenberg 2016). This was true for some MPs but not for the MP who also doubled as the Minister of Foreign Affairs. The GIS did not care to persuade her because it was clear she would not be persuaded. This was because the new law was taking some functions away from her ministry and placing them under the Ministry of Interior. This, she felt, would debase her and her ministry in terms of prestige, staff and budget, so she vehemently opposed the policy. The addition to the literature here is that two types of opponents are identifiable: those who can be persuaded; and those who cannot be persuaded. Those who cannot be persuaded are those who will incur high costs in variety of forms for voting differently.

The unwillingness of the GIS to persuade some legislators and political executives because it thought they would not be persuaded underlines one of the costs in bureaucratic lobbying, that is the potential of angering political principals (Bradley 2014). It also reflects divergence of interest between administrators and some politicians. The Minister of Foreign Affairs had a lot to lose from the new policy, so if GIS had attempted to lobby her it would have not only infuriated her but it would have been an attempt at reconciling irreconcilable interests between politicians and bureaucrats. However, the fact that GIS was willing and actually did persuade the Minister of Interior but not the truculent Minister of Foreign Affairs, both members of the ruling government, means there can be co-existence of interest convergence and divergence, and for that matter a cooperative and adversarial relation between politicians and bureaucrats in any given episode of lobbying. These contradictory outcomes for any given bureaucratic effort to influence a political decision are hardly, if at all, identified in the literature.

The posturing of the Minister of Foreign Affairs joins what Johnson (2016) describes as the self-interest model, which is a predication on the notion that all policy actors pursue their own self-interest. On the other hand, the support for policy reforms that GIS garnered from the Minister of Interior and legislators across the political divide feeds the policy model, which posits that actors have specific policy goals based on their assessments of good public policy (Johnson 2016). It also underlines the role of values in influencing public attitudes and motivations in developing countries. Furthermore, it highlights the desire to help society and its citizens. It also shows how "important unselfish motivational components like loyalty, identification, and good-spirited cooperation are in overcoming collective action problems, such as free-riding, moral hazards, and opportunism" (Vandenabeele et al. 2014, 780).

In respect of the outcome of the lobbying communication process, it is evident that the GIS succeeded in influencing the Minister of Interior to not only place the proposed Immigration Service reforms on the government agenda but also got him to support it in parliament. The GIS also succeeded in winning bi-partisan legislators' support for the new bill and eventually influenced them to pass it into law. The other achievements of the GIS were that it was successful in increasing attention to immigration issues and broadening the knowledge of the Minister of Interior and legislators about immigration matters, especially about the changed global environment in which the agency must now operate. Moreover, it persuaded all categories of policy makers: supporters, undecided minds and opponents of the bill to vote for it; and it gained experience in lobbying which could be used for future lobbying.

This evidence supports the view that the effect of lobbying should not be limited to only the final outcome, that is the extent to which lobbyists influence public policy decisions in the preferred direction. It should extend to cover intermediate outcomes, such as drawing attention to an issue or informing or persuading some policy makers (Bruycker 2014). These intermediate outcomes are important because although lobbyists may not have succeeded in tipping policy in the preferred direction, they would have nonetheless gained experience which is crucial for repeat engagement. They also would have made new allies which could prove critical in achieving profound policy reforms in future lobbying episodes (Bruycker 2014).

Conclusion

This study investigated the relationship between the lobbying of GIS and the outcomes it generated. The focus of the investigation was on four areas: the strategies and tactics of lobbying employed; assessing the intermediate outcomes achieved; determining the final outcome attained; and ascertaining the impact of GIS's lobbying on politics-administration relations.

The strategies and tactics GIS adopted, such as workshops, phone calls and one-on-one private meetings with politicians, succeeded in achieving the desired policy reforms. It also achieved intermediate outcomes like experience, networking and acquaintances, which will be invaluable in future lobbying episodes. In respect of the impact of lobbying on politico-bureaucratic relations, the paper has made several minutiae worth noting. These are: the scant attention being paid to politician-bureaucrat relations in the Third World, especially as it pertains to practical policy-making and the development process; the silence on whether the politician-bureaucrat relation is a dynamic or a static category; the muteness on the factors that cause change in the politician-bureaucrat relation; and the factor(s) that has more explanatory power in relation to the changes in politician-bureaucrat relations. This lacuna in the literature has led to the adoption of donor-inspired best-practice approaches from developed countries to undergird development policy and governance in the Third World. This study fills these gaps by highlighting that the politics-administration relation in developing countries and elsewhere cannot be explained by one best-practice model. Rather it is explained by a best-fit model that combines elements of different models and local nuances that are relevant to any specific context or decision-making process.

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