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Unpacking interest groups: on the intermediary role of interest groups and its effects for their political relevance
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Chapter III

Inside Transmission Belts: How Umbrella Groups Involve Members in Establishing Policy Positions

ABSTRACT

Umbrella associations form a vital link between society and public authorities by representing their members in policymaking processes. A crucial component of this transmissive role is the involvement of members when determining policy positions. In this process, umbrellas have to overcome collective action problems by aggregating the preferences of their members. By focusing on the perspective of umbrella leaders, this paper explores how umbrella groups involve their members when establishing policy positions. The paper relies on qualitative interview data from the leaders of prominent and supranational umbrella organizations active at the EU level. The findings show that while members are generally involved in umbrella affairs, variation in membership heterogeneity and in how members perceive policy issues lead to biased member involvement in position-taking. While group leaders are aware of these dynamics, it raises questions about the representative potential of groups and the legitimacy of their policy claims.

3.1 Introduction

Umbrella organizations are crucial stakeholders in our governance systems. Defined as actors that represent the interests of their member groups (Junk, 2019a), umbrella organizations perform a vital intermediary function in western democracies by connecting societal voices with policymakers (Kohler-Koch, 2009; Kröger, 2018). As a result of their representative nature and often sizable membership, umbrella groups can contribute to an efficient and legitimate policy process, that also eases future policy implementation (Junk, 2019a). Much research at the EU and national level shows that umbrella organizations often enjoy high degrees of access and influence among policymakers (Berkhout et al., 2017; Binderkrantz, Christiansen, & Pedersen, 2015; Junk, 2019a). Rather than going through extensive consultation processes with a multitude of actors, policymakers can save time and money by obtaining information about the position and preferences of key constituencies involved within a given field or industry by talking to specific umbrella groups (Rajwani et al., 2015).

A key assumption behind the democratic and political importance of umbrella groups is that they act in the common interests of their members and accurately represent their views and preferences (Albareda & Braun, 2019; Chapman & Lowndes, 2014; Dunleavy, 1991; Rajwani et al., 2015). This implies that members are heard by the leadership of the organization and involved in decision-making processes. However, the process of engaging members when establishing policy positions is rather complex and often suffers from collective action problems (De Bruycker et al., 2019). Many umbrella groups struggle to establish policy positions that reflect the (different) views of members, and this challenges their ability to fulfil a transmission belt function (Greenwood & Webster, 2000; Kohler-Koch, 2010; Kohler-Koch & Buth, 2013; Kröger, 2018; Rodekamp, 2014). Specifically, the literature on umbrella groups has emphasized the lowest common denominator problem as one of the main collective action challenges these organizations face (Greenwood & Webster, 2000; Kohler-Koch & Buth, 2013; Kröger, 2018). This problem reflects the tensions that umbrella confront when seeking to represent the preferences of all their members while being politically relevant and therefore take into account demands and preferences of policymakers. In this complicated balancing exercise, umbrella leaders are central actors, as they can stimulate collective action among the members and steer towards policy positions that avoid 'politics of the lowest common denominator' (Rodekamp, 2014, p. 188). This is a crucial organizational and political task.

This paper takes the perspective of the leaders of umbrella organizations, as they have a critical role in making 'choices about who to represent and how to represent them' (Han, Andrews, Ganz, Baggetta, & Lim, 2011, p. 54). Despite the increasing attention to the internal governance and structures of umbrellas and interest groups (see for instance, Barakso & Schaffner, 2008; Halpin & Fraussen, 2017b; Halpin et al., 2018; Kohler-Koch & Buth, 2013; Kröger, 2018; Rodekamp, 2014), research has provided little insights into

how the umbrella leadership addresses the challenges and reconciles trade-offs related to their representative function. As a result, we only have a limited understanding of the processes through which members are involved in establishing policy positions, and why and how this varies across and within umbrella organizations. To provide more insight into this important question, this paper aims to clarify what happens inside the transmission belt by putting forward the following specific research question: *how and under which circumstances do umbrella groups involve their members in establishing policy positions?*

Providing insights related to this research question is important for public administration scholars and practitioners alike. Our current governance systems are designed to promote an active engagement of external stakeholders, and public officials often consider umbrella group as key intermediary actors as they provide relevant political and technical information that increases the legitimacy of decision-making processes. As public officials seek guidance from umbrellas' policy input, it is essential to assess the democratic nature of umbrellas in the process of establishing policy positions. More generally, insights into these internal dynamics are imperative for assessing the contribution of umbrella groups to effective and legitimate public governance.

The next section of the paper discusses collective action problems of politically active umbrellas and highlights the importance of two factors that shape member involvement in position-taking processes: membership heterogeneity and issue features as perceived by the members of the umbrella. Empirically, the paper relies on qualitative information from in-depth interviews with the leadership of supranational umbrella organizations that are regarded as prominent among EU public officials. The analysis shows the relevance of membership heterogeneity, particularly the unequal level of resources among members, and issue-level features – i.e., whether issues are perceived as controversial or particularistic among the membership-base – in the process of member involvement for establishing policy positions. The last section of the paper discusses the implications of our findings from a governance perspective and highlight avenues for future research.

3.2 Establishing policy positions through member involvement

A key collective action challenge umbrellas need to address when establishing policy positions involves aggregating and representing the preferences of their members in a way that their messages resonate with policymakers (De Bruycker et al., 2019). This tension is related to the idea of functioning as a transmission belt that connects members with policymakers, thus balancing the logics of membership and influence (Schmitter & Streeck, 1999). On the one hand, umbrellas exist thanks to their members and their core function is to serve their interests, yet, on the other hand, policymakers want clear and relevant policy input form umbrella groups. While being attentive to members' demands emphasizes the involvement, inclusion and representation of the different voices within the umbrella, seeking access and influence stresses values such as efficiency and

control over members, which may collide with member involvement and hamper the representative capacity of umbrellas (Berkhout et al., 2017; van der Pijl & Sminia, 2004). Consequently, as noted by Beger (2002, p. 82), umbrellas have to 'search for consensus within the [members] and between the [members] and the bureaucracy/legislator'. The process of establishing policy positions represents an important collective action problem that reflects these tensions, trade-offs and difficulties of umbrellas in reconciling member preferences and public officials' demands.

These sometimes-conflicting dynamics between representing members and being politically active often become manifest in the form of common denominator problems. As noted by Kröger (2018, p. 781) 'one cannot assume a single well-defined common interest for groups lobbying in the same policy area'. Despite forming part of an umbrella with a predefined collective goal, members might have diverging interests in concrete policy issues, which 'leads to the collective action problem of having to integrate different views and identify the lowest common denominator' (Kröger 2018 p. 781). This common denominator position might become a problem for umbrellas that intend to be politically relevant. As succinctly posed by Greenwood and Webster (2000, p. 64), some EU business associations 'are economic giants but political dwarfs, partly as a result of the inability of their associations to go beyond lowest common denominator positions.' The common denominator idea implies that all the voices within an umbrella are heard and represented through the umbrella, at least to a certain extent. Yet, it can also lead to watered down and rather conservative policy positions that are less relevant for policymakers developing new legislations (Greenwood & Webster, 2000; Kröger, 2018).

Umbrella leaders play an important role in reconciling the (different) interests and views of members with the preferences and demands from policymakers (Salisbury, 1969; Walker, 1983). In fact, the main role of the leaders is to establish policy positions and interact with policymakers, a task that might distance them from their membership-base (Holyoke, 2013, p. 287). To further explore how umbrellas deal with these dynamics, this paper takes the perspective of the leaders and focuses on the processes they put in place to resolve collective action problems resulting from two distinct yet interrelated factors that have been widely acknowledged in the literature, yet not taken into account to specifically assess the varying degree of member involvement in position-taking processes: membership heterogeneity and policy issue features as perceived by the membership-base.

3.3 Membership heterogeneity and policy issue features

Previous research focused on collective action problems of interest groups and the challenge of identifying common denominators (or overcoming outcomes that reflect the lowest common denominator) has identified two elements that strongly shape how members are involved in the establishment of policy positions: the internal heterogeneity of the group and the specific features of the policy issue under discussion.

Firstly, the internal heterogeneity across members in umbrella groups has been related to the presence of collective action problems (De Bruycker et al., 2019; Holyoke, 2013; Offe & Wiesenthal, 1980; Olson, 1965; Ostrom, 1998). Internal heterogeneity implies that the members within the umbrella differ in terms of resources, preferences, organizational forms and policy fields or industries. Groups with heterogeneous membership bases face more difficulties when reaching common positions that go beyond the lowest common denominator (Berkhout, 2013; De Bruycker et al., 2019; Greenwood & Webster, 2000; Kröger, 2018). Internal heterogeneity makes it more difficult to formulate common positions because members lack (or have to a lesser extent) a 'notion of shared collective identities and mutual obligations of solidarity' (Offe & Wiesenthal, 1980, p. 81). Umbrella members often view the organization as a 'vehicle that serves to improve their self-interests' (De Bruycker et al., 2019, p. 301), and when the membership-base is heterogeneous it is less likely that the 'self-interests' will overlap across members, which hampers collective action. As a consequence, umbrella groups with heterogeneous membership-base, require internal mechanisms and leaders that resolve the sometimes-conflicting interests among members and produce politically relevant policy positions. For instance, recent work suggests that more heterogeneous membership base often leads to more professionalized organizational structures, characterized by limited involvement of members (Albareda, 2018). However, the exact role of the leaders and the processes they follow to formulate policy positions while involving members and reconciling interests, has remained understudied.

The second dimension that shapes involvement of members in the establishment of policy positions concerns policy issue features. The severity of the collective action problems that umbrella groups experience depends strongly on the nature of the policy issue on which they seek to mobilize politically. Issue-level features have been extensively analyzed when studying mobilization, strategies, access and influence of interest groups and umbrellas (Bernhagen et al., 2015; Beyers, Dür, & Wonka, 2018; Hojnacki, 1997; Klüver et al., 2015). Previous research also demonstrates that issues are differently perceived by members and consequently affect the internal dynamics and processes of umbrella organizations (Ahrne & Brunsson, 2008; Beyers, 2008; De Bruycker et al., 2019; Rasmussen, 2015; Smith, 2000; Strolovitch, 2006, 2007). The nature of the policy issue may have different implications for umbrella members, that is, reaching common positions within umbrellas is presumably linked to the effects that policy issues will have on the membership base of the umbrella. As noted by Greenwood and Webster (2000, p. 74), 'organizations tend to pre-select agendas so as to concentrate on a small number of specialized issues that they think will interest their members' (see also, Ahrne & Brunsson, 2008). That is, umbrellas try to avoid conflict among their members and focus on issues where they can easily agree, a behavior that relates to niche seeking strategies and the tendency to specialize on concrete policy issues and sectors. However, this is not always possible and organizational members of umbrella groups may have different policy positions due to their diverging

interests on policy issues (Beyers, 2008; Kröger, 2018; Rasmussen, 2015; Smith, 2000). As a consequence, the level of involvement is likely to be affected by the degree to which members have a stake on the issue under discussion (Strolovitch, 2006, 2007), yet it is not clear how umbrella leaders deal with different types of policy issues when establishing policy positions.

In summary, umbrella leaders need to deal with internal tensions and challenges to overcome collective action problems related to the involvement of members when formulating policy positions. Previous work has highlighted both membership heterogeneity and issue features as factors that are likely to shape this process. In the remainder of this paper, we examine to what extent and how these two dimensions shape the involvement of members in the establishment of policy positions. The next section presents the data and approach implemented to explore this fundamental question about the representative capacity of umbrellas.

3.4 Research design

We explore how umbrellas involve their members when establishing policy positions with qualitative data from semi-structured interviews with the organizational and political leadership of thirty-two supranational umbrella groups. An exploratory approach relying on in-depth interviews is highly suitable considering our central research question and the scarcity of previous work on this particular topic. Moreover, the flexible approach of qualitative methods enables us to continually adjust to the emerging findings in the process of data collection and data analysis, and thus report results that might have not been envisioned (Boeije, 2009, p. 32). While we expect member heterogeneity and policy issue features to play an important role in how members are involved in position taking processes, we are also sensitive for emergent insights related to other concepts. Therefore, our approach is suitable for developing and refining theory about the varying degree of member involvement in umbrellas.

3.4.1 Case selection and sampling

The cases included are purposively selected because they represent a theoretically interesting exemplar of a phenomenon of interest, namely how the member organizations of umbrella groups are involved in establishing policy positions (Boeije, 2009; Nowell & Albercht, 2018). More specifically, we study supranational umbrella organizations mobilized at the EU level, contributing to an emergent stream of research in this field with a similar focus (Kröger, 2018; Rodekamp, 2014). On the one hand, umbrella groups mobilized at the EU level can be 'considered a most likely case for interest groups to experience collective action problems related to both organizational formation and policy mobilization' (De Bruycker et al. 2019). On the other hand, umbrella groups at the EU level have political incentives to engage with their membership base as this has been a long-lasting demand of

the EU institutions (European Commission, 2001, 2002; Kröger, 2014). These opposing incentives and the scarcity of research on how umbrella groups and their leaders manage these challenges (but see, De Bruycker et al., 2019) makes the study of supranational umbrellas active at the EU level highly relevant.

The umbrellas included in the study have organizations or associations as formal members[18] and have been mentioned in an interview with public officials of the Commission as key non-state stakeholders when formulating and developing EU regulations and directives (see Rodekamp, 2014 for a similar approach in selecting cases).[19] Therefore, we applied a purposive sampling strategy designed to select prominent umbrella groups – that are on-top of Commission officials' mind when asked about the stakeholders that were key when working on a particular policy issue (Halpin & Fraussen, 2017a). We selected prominent umbrellas to ensure that groups are closely involved in policymaking, and thus often face the issue of having to engage members and contributing to the policymaking process. In addition, assessing how these organizations involve their members is normatively important as it unveils the representative nature of those umbrellas that EU officials perceive as the most relevant interlocutors when formulating policy proposals.

Table A1 in Appendix to Chapter III presents an overview of the main features of the umbrellas interviewed. It is important to highlight that the cases include vary in terms of group type, 23 of them (i.e., 71%) are economic organizations, such as the European Federation of Pharmaceutical Industries and Associations, while 9 (i.e., 29%) are citizen groups, as the European Patients' Forum.[20] Moreover, there is variation in terms of the members represented by the umbrellas: 37% of the cases include individual organizations (e.g., Transport & Environment); 47% of them represent associations (e.g., European Banking Federation); and 16% of the cases have both individual organizations and associations (e.g., European Public Health Alliance). Moreover, the organizations included also vary in terms of size (ranging from 7 to 93 organizational members) and age (from 7 to 82 years of existence).

3.4.2 Interview data

The thirty-two interviews were conducted between March and December 2019. The interviewees are experienced representatives (organizational and political leadership) of the umbrellas included in the study. More specifically, the interviewees occupied the following positions within the organization at the time of the interview: president, (executive) director, secretary general or similar (n=12); policy coordinator, policy advisor, director of policy or similar (n=9); team leader or director of group's unit (n=11). On average, interviewees have worked in the organization they represent for 10 years.

To obtain information about how leaders generally involve members in establishing policy positions, trained interviewers relied on a semi-structured questionnaire, and made use of probing questions to explore all potential explanatory factors related to member

involvement in position taking. More specifically, the interviews with leaders of umbrellas consisted of 20 questions about the internal mechanisms to involve members, the different processes they follow when deciding and establishing policy positions, and the challenges and trade-offs they face as membership-based organization that frequently engage with policymakers at the EU level.

The duration of individual interviews was 30 to 60 minutes. To provide a thick description of the mechanisms that generate varying degrees of member involvement, we combine textual interview data with quantitative data from several closed questions as well as data retrieved from the groups' statutes and websites. All the interviews were digitally recorded and transcribed. The transcripts represent the basic linguistic corpus to engage in qualitative analysis with Atlas.ti, a software package to facilitate data managements and analyses.

The interview transcripts were analyzed and coded by the authors through an iterative process. A first step in the coding process was to select those passages where interviewees reflected on the involvement of members during the establishment of policy positions. This overarching code served to obtain a general perspective of how umbrella leaders involve members in the process of establishing policy positions, and constitutes the first descriptive part of the findings. To conduct a more detailed analyses of how umbrellas involve members, we rely on the two dimensions presented in the theoretical section (i.e., membership heterogeneity and issue features) which serve as sensitizing concepts. All the relevant quotes in the transcripts were coded and subsequently confronted with the sensitizing concepts in order to assess if the processes of involving members when establishing policy positions could be related to any of the two dimensions. Ultimately, our findings present the reflections of the interviewees on three broad codes that have been related to the two sensitizing concepts. Regarding member heterogeneity, the code that was more frequently mentioned and discussed among interviewees is the 'unequal resources among members'.[21] As for issue features, two codes have been related to it as elements that affect how umbrellas involve members: the extent to which issues are controversial among members (i.e., controversial issues), and the level of specificity of the issues (i.e., particularistic issues).

3.5 Findings

A first important observation is that all interviewees acknowledge that their organizations involve their members to some extent in the process of establishing policy positions. In only 6 cases (19%) members were little or somewhat involved, whereas in 26 umbrellas (81%) members were considerably or extremely involved (see Table A1 in Appendix to Chapter III). That means that none of the umbrellas included in the study had 'no membership involvement' when establishing policy positions. More importantly, according to the leaders' general perspective, the large majority of the umbrellas have a very active

membership base when it comes to establishing policy positions (see Rodekamp, 2014 for similar findings). Additionally, most of the group leaders note that their members have similar preferences,[22] which facilitates reaching common positions without having to resolve major difficulties. In that regard, the outspoken tension within umbrellas to reach common positions is not as prevalent as previous studies may have implied.

At a general level, respondents note that for the majority of the policy issues, members share similar positions and there are no major disagreements.[23] Consequently, it is relatively easy for groups' leaders to identify and establish policy positions. A common practice when doing so is that leaders draft a policy position based on their knowledge and previous experiences. Subsequently, they will reach out to all the members in the organization to get their input on policy positions.[24] Moreover, as reflected in the quote below, the leaders have an important role in warranting an agreement among the members by taking into account all the perspectives and ensuring that all members will agree on the position.

> *We [the leadership] do a first draft of a position paper and then we consult on it [with members], and it may look very different in the end. In the end, we do not do anything without the explicit consensus of our members. (…) But, if we [the leaders] do our homework by looking at policy issues where there are common challenges shared by members, then quite often we get consensus from members, by concentrating on where the common factor is. (Respondent#36)*

Importantly, the majority of our respondents highlight that the involvement of members is very much dependent on the resources that members have available and how members perceive the policy issues under discussion. In the next section, we focus on these two elements and their relationship for members involvement in the process of establishing policy positions.

3.5.1 Membership heterogeneity: Unequal resources among members
The majority of respondents indicated that unequal resources among members had a big impact on the involvement of members in establishing policy positions.[25] Aligned with previous research in the field, group leaders clarified how poorly endowed members are less frequently involved in establishing policy positions, compared to more resourceful members (see for instance Barnett, 2013; Kröger, 2018).

> *Those [members] that can afford to monitor all those issues, then they can get actively involved in all or many of the policy positions. And this might be around 30 to 40% of our members. These are mostly the largest or more resourceful [members]. (Respondent#32)*

Very small companies, sometimes with less than 20 persons, don't have time to take care of [EU affairs]. They are fighting for the daily income. So, they basically delegate all the political activities to us. (Respondent#34)

We have very resourceful members who have the resources to be actively involved, and also have very small members who just don't have the capacity to come to a workshop or whatever. (Respondent#12)

Even if umbrellas have relevant organizational structures that facilitate member involvement, that does not guarantee that all the members will get equally involved. In that regard, the leaders emphasize that they are neutral receivers of members' information and, as such, they try to ensure that groups' positions are not dominated by large members.

[Our] members try to influence us as well. But we [the leadership] try to act as a neutral receiver in a way, and also ensure that our positions are not dominated by certain [members]. (Respondent#1)

Despite presenting themselves as neutral receivers, the interviewees also state that they cannot do much about the internal participation bias, beyond eventually reaching out to specific members.

I am not going to babysit anybody. If [members] do not raise any issue [related to policy positions], then I will not do anything about it. Unless that I am aware of something. Then of course I would reach out to the members and check. But if I'm not aware and I'm not made aware, then I cannot do anything. (Respondent#33)

If we have a new position coming or we realized that we need to have a new position then we will email all of our members through our members email list and then kind of informing them how the process will go. Then, no one can claim that they didn't receive it. Then it's their own problem if they didn't participate. (Respondent#24)

Overall, this unequal level of involvement has clear implications for the representative capacity of umbrellas. The non-participation of less resourceful members might generate internal biases toward the preferences of more resourceful members. In other words, lowest common denominator positions might be exclusively based on input from resourceful organizations, neglecting the preferences of less resourceful organizations. The following quote illustrates this:

If there is any member that maybe has more influence [when internally establishing policy positions], I think this will be due to their ability to be more present, and give more information, and provide more examples. By bringing more food to the table. So that's very normal. And that's not a thing that we resist. (…) Members that have more manpower, more examples to give, more technical abilities, and more technical expertise will be contributing more. (Respondent#04)

An additional important question is how are members involved in establishing policy positions in the three umbrellas where respondents indicated that their members had 'very similar resources'. According to these respondents, the limited number of organizations within the umbrella is crucial to ensure that their members are similarly endowed and that thus that are equally involved (see also, Rodekamp, 2014, p. 189). In that regard, these three cases only have 7, 12 and 16 members, a number which is significantly below the 36 members that the umbrellas studied have on average (see Table A1 in Appendix to Chapter III). Paraphrasing the leader of one of these organizations, the limited number of similar members facilitates their intensive involvement in every policy process (Respondent#22).

3.5.2 Issue-level features: Controversial and particularistic issues
In addition to unequal resources among members, respondents acknowledge that member involvement depends very much on the relevance of the topic in the eyes of individual members. Even though many umbrellas indicate that members are actively involved in establishing policy positions and that common positions are easily reached, almost all interviewees also highlight that, in fact, the extent to which member are involved in establishing policy positions depends on the issue at stake and its importance to their members. Specifically, twenty-four interviewees explicitly state that member involvement and the process of establishing policy decisions is contingent on the issue that is being discussed. Our inductive approach to the analysis of issue-level features enabled us to gain more insight into this "issue contingency", and distinguish two types of issues that directly affect how leaders involve members in the process of establishing policy positions: controversial and particularistic policy issues.

3.5.2.1 Controversial issues

Umbrella leaders note that in some instances different factions of members have high stakes and divisive positions, which leads to higher levels of member involvement and generates collective actions problems. As discussed above, controversial issues are generally the exception among the umbrellas examined here, as their members tend to have rather similar preferences. However, in some policy issues these preferences are not aligned and conflicts between members may arise. While the occurrence of controversial issues is rare, they are difficult to resolve and thus require work and time from the umbrella leadership.

As noted by one interviewee, in "85% of the cases we have a very easy consensus, but 15% of the policy issues we discuss are difficult or very difficult, they take our time and energy" (*Respondent#25*).

The extent to which members have different and conflicting perspectives on policy issues leads to a more active involvement from members seeking to protect their interests and, importantly, it sometimes impedes reaching common positions. Controversial issues lead to collective action problems because they generate winners and losers within the membership of the umbrella organization. They can also affect the functioning or even the identity of organizational members. In this case, members with a stake are very involved to make sure that the umbrella does not communicate positions that go against their interests. On these issues, the role of the leadership is critical, as they need to reconcile the diverging positions of member organizations.

> *When there is a controversial issue in a way then [members] are more involved than if everyone is aligned from the start, then it's probably easier [to reach common positions] and members are not as involved" (Respondent#13).*

> *Sometimes [reaching policy positions] is extremely easy, sometimes if it's a controversial topic, it can take a year. Okay, it really depends on the issue. For instance, a very easy one was the position on [policy X] (…). A hard one that we're finding now is on [policy Y]. Here the problem is our members have different opinions. And it is controversial. (Respondent#10)*

> *When you have a policy issue that puts members of a particular country or a group of countries into a disadvantaged position [in comparison to members in other countries], then members are more involved and it is more difficult to reach positions. (Respondent#33)*

Reaching a common position might be particularly problematic in controversial issues since "[members] are not going to give up their fundamental interests" (*Respondent#26*); or, as noted by another respondent "any discussion that involves basic principles has the potential to become very difficult to come to an agreement" (*Respondent#27*). Consequently, umbrella leaders have the challenging task of trying to reconcile opposing interests among their membership. This is a very delicate balancing exercise, as a lack of consensus might lead to dropping the issue of the political agenda of the group, or some members leaving the organization because the established policy position goes against their interests and preferences.

Interviewees also highlight that many issues are rather narrow and only attract the attention of a minority of members who tend to share similar preferences and positions. In this case, a subset of members that are knowledgeable and affected by the policy issue at stake is actively involved in the process of establishing policy positions. As noted by one respondent "generally speaking I would say the members that are affected by a particular issue would be very involved" (*Respondent#29*). But the process of involving members is not always the same across umbrellas.

We identify two mechanisms through which this involvement takes place. The first one is a more formalized way to involve a subset of members with a stake on the issue. Umbrellas establish a division of work in formal working groups or committees that gather members with a particular interest in certain policy domains or topics. These groups are responsible of discussing the policy issue and come up with a policy position (normally based on consensus). Generally, the position of the working groups will be the one adopted by the organization, sometimes after the approval of the executive bodies of the organizations, yet without the specific authorization of the whole membership base. As illustrated below:

> *Let's say that in technical policies the relevant working group will work out policy positions, which will then come to me specifically. Yeah, and I will run it by the executive committee and/or the steering group which validates the position. (Respondent#04)*

> *So, [policy positions] are drafted and agreed at the working group level. Then, depending on the topic, it may or may not need approval at the executive committee and the board. It's not always the case (…) only for the more political issues. (Respondent#33)*

The second mechanism is more informal and promoted either by the leaders or the members themselves. That is, member involvement is often induced by the leadership of the organization, who actively reach out to those members that will be affected by a concrete policy issue or that are knowledgeable about the topic and thus can provide valuable policy expertise.

> *[Member involvement in establishing policy positions] really depends on who is going to be impacted by the policy. If the policy is about X, we involve members working on X to have the first draft'. (Respondent#10)*

> *(…) we're not going to send [a policy position] around to the entire membership if most of them find it irrelevant. You don't want to spam them either. We're working*

*on so many things at the same time. (…) So, we try to only communicate with those
that we think might be interested in it. (Respondent#35)*

However, members also self-select which battles are worth fighting and strategically decide
when to engage in establishing policy positions. Importantly, this remains a rather top-
down approach, as it is not the members who actively raise policy issues to the leadership.
Instead, the leadership identifies an issue and communicates with the whole membership-
base, yet only a subset responds. One group leader explicitly acknowledged this dynamic:

*We try to involve members all the time (…), but in the end of the day it is about
self-selection and what matters is whether the policy is relevant for their work (…)
So, we have members who focus on issue "A" for instance. On this issue, they are
extremely involved, but they are not at all involved in anything related to policy
issues "Y" and "Z". (Respondent#26)*

In these rather informal procedures, the leadership intends to involve the whole member-
ship base when approving the final decision. That is, once the initial policy position is
agreed among a subset of members that have a direct stake on the topic, this position is
shared with the rest of the group for approval:

*(…) we normally propose a position, you know, it would say a smaller group nor-
mally proposes a position, and reaches out to the broader membership to see if we
can get them on board. (Respondent#13).*

3.6 Discussion

At a general level, we observe that umbrella groups included in the study actively involve
their members in establishing policy positions. Aligned with previous research, we observe
that leaders of supranational umbrellas have an important intermediary role (Beger, 2002;
Rodekamp, 2014). Typically, the leadership drafts initial positions to subsequently reach
out to members for input in establishing consensual positions. As a consequence, umbrella
leaders have an central role in defining their members' interests at the EU level since, as
noted by Barber (1950, p. 496), 'constituents may not always be sure about their interests
and need help with developing them' (see also, Rodekamp, 2014, p. 188). Generally, um-
brellas leaders do not experience significant challenges when establishing policy positions.
In that regard, leaders might be strategically selecting policy issues on which the members
do not have different or conflicting positions and where easy consensus can be reached
(Greenwood & Webster, 2000). Another explanation related to this 'easy consensus' is that
leaders not only consider an unanimous support for a position as sign of consensus, but

also conclude that members are largely in agreement when there is no objection (i.e., when members abstain or do not participate) (Ahrne & Brunsson, 2008, p. 124).

The interview data also shows the relevance of the two dimensions presented in the theoretical section and explored in the analysis as relevant factors affecting the unequal involvement of members in the process of establishing policy positions. First, interviewees note that more resourceful members tend to dominate decision-making processes because they are more actively involved. Aligned with previous research, umbrellas are often dominated by those resourceful members that can define their policy preferences and provide relevant information and expertise (Ahrne & Brunsson, 2008; Barnett, 2013; Johansson & Lee, 2014; Kröger, 2018; Salisbury, 1969; Walker, 1983). Ultimately, that means that power within an umbrella can be taken over by those who can constantly commit themselves, and the others will fall behind (Alter, 1998, p. 269; Barnett, 2013). Importantly, while having members with different preferences can lead to important collective action problems (Kröger, 2018), unequal resources among members do not seem to generate similar concerns among the umbrella leadership.

Second, our findings indicate that the process of involving members when establishing policy positions is contingent on the type of policy issue under discussion. Controversial issues imply that members have high stakes and hold divisive positions on the issue (see also Smith 2000). In this type of issues, the leadership engages in discussion with all the members that have a stake and tries to reconcile different positions. We observe that establishing policy positions is particularly challenging when umbrellas deal with internally controversial issues that have different implications for subsets of members (De Bruycker et al., 2019; Kröger, 2018). In these cases, the involvement of members increases as they see their interests threatened by the preferences of other organizational members. The leaders' challenge is then to go beyond lowest common denominator positions and remain politically active. It is important to mention that, according to the leader's perspective, controversial issues are the exception rather than the rule. Because these issues attract a lot of attention from members and require intensive work and a lot of time from the leaders, they are also the most prominent ones. However, our findings seem to indicate that umbrellas often circumvent collective action and common denominator problems by either paying attention to most resourceful members (as shown above) or by focusing on narrow or particularistic issues (as presented below).

Particularistic issues, those that only affect a minority or subset of members with high stakes and knowledge on the issue, have been highlighted before as an element affecting member involvement in position-taking processes (see, Smith, 2000; Strolovitch, 2007). In particularistic issues, the leadership (either directly or indirectly) targets a subset of members with an interest in the policy issue. Similarly to previous investigations, we find that members are less active and engaged at the umbrella level when the issue under discussion does not fall into one of the policy areas in which they have expertise and a direct

stake (Rodekamp, 2014). This observation is also related to the increasing specialization and professionalization of groups (for a discussion see Maloney, 2015), who seek to supply technically sound information to policymakers. By exclusively involving members with high expertise and a direct stake in an issue, umbrella groups may see their encompassing representative function damaged, but they are more able to supply specialized knowledge in a timely manner. In addition, through this process, the leaders by-pass the consensus-reaching procedure that normally generates collective action problems leading to lowest common denominator policies. Umbrellas, therefore, are being accommodated to the demands of public officials in need of timely and specialized policy input.

3.7 Conclusion

This paper explores the process of involving members in umbrella groups when establishing policy positions. Relying on qualitative interviews with organizational and political leaders of supranational and prominent umbrellas active at the EU level, we demonstrate that while members are generally involved in umbrella affairs, variation in membership heterogeneity and issue-level features lead to biased participation of members when establishing policy position. By paying particular attention to membership heterogeneity and issue-level features this paper lays a groundwork for future research studying member involvement in position-taking processes of umbrellas and interest groups more generally. More specifically, we underline the relevance of unequal resources among members and issue-level factors to study the internal processes of umbrellas (and membership-based interest groups). Whereas unequal resources among members has been previously acknowledged as a relevant factor affecting interest groups' internal dynamics, policy issue level features have been mostly used to study interest groups' mobilization, strategies and influence, yet, they are also found to be crucial to understand how groups function and how representative their policy positions are.

Because the main research question has received limited scholarly attention, we opted for an in-depth qualitative approach. In that regard, further research is needed to assess whether the findings apply to other types of umbrellas and groups that (1) are not mobilized at the EU-level (2) have individuals as members and (3) are not considered as prominent organizations by public officials. Furthermore, our focus on the leadership of umbrellas needs to be complemented in future work through the inclusion of the perspective of the members that are unequally involved in establishing policy position.

As discussed in the introduction, policymakers value umbrella groups because of their intermediary role and their representative potential, however, interview data shows that less resourceful members might be underrepresented in these organizations. It is worth noting that none of the respondents referred to the possibility of selectively engaging certain members by 'providing structural incentives that make participation more attractive to those who are ordinarily less likely to participate in politics' (Fung, 2006,

p. 67). As a consequence of this limited involvement of poorly endowed members the representative potential of umbrella organizations might be affected and biased in favor of more resourceful members. The leaders acknowledge this as a problem that affects member involvement in establishing policy positions, but their rather passive attitude in making sure that all members are equally involved and heard indicates that this is not a major organizational focus.

From a leadership perspective, the strategies followed might be the most logical and pragmatic way to proceed so as to keep the organization running. As stated by Strolo-vitch (2007, p. 208), 'not every organization can represent every constituent or potential constituent at all times, nor can organization flout the exigencies of organizational main-tenance or focus exclusively on disadvantaged subgroups to the exclusion of majorities and advantaged groups'. However, this inability to represent different members equally well may lead to what is known as the representational strain, where 'some interests are better represented than others' (Schnyder, 2016, p. 748 see also Kröger 2018; Rodekamp 2014). In other words, lowest common denominator policy positions might not always be representing all the members, particularly when umbrellas have members with unequal resources and deal with controversial policy issues.

To conclude, this paper shows that even though the members of umbrella organizations are generally involved when establishing policy positions together with the leadership, there is important variation and we cannot always assume that the position of umbrellas is actually representative of the whole membership-base. In that regard, umbrellas still serve as transmission belts between their members and policymakers, but the transmis-sive system is sometimes flawed and this may hamper the representative role of umbrella groups and their contribution to the legitimacy of our governance systems.

Notes

18 As noted in previous research, umbrella organizations do not communicate directly with lay-members, instead they tend to communicate through their direct or first-line members (Johansson & Lee, 2014; Sudbery, 2003; Warleigh, 2001). That is, we study the relationship between umbrella organizations and their immediate members (other membership groups or organizations), as a first step in the connection with their broader constituencies. This first connection is highly relevant because, if the 'top chain of representation is dysfunctional, the links to lower organizational levels are also unlikely to work, as information cannot be channeled further downwards or upwards' (Rodekamp, 2014, p. 25).

19 This sampling strategy is embedded within a larger project focused on stakeholder engagement in regulatory governance. The first step of the project was to sample all the regulatory issues passed at the EU-level between 2015-2016 that followed the ordinary legislative procedure and that fall into one of the following policy domains where the EU has exclusive or shared competence with member states: (1) Finance, banking, pensions, securities, insurances; (2) State aids, commercial policies; (3) Health; (4) Sustainability, energy, environment; (5) Transport, telecommunications; (6) Agriculture and fisheries. Commission officials, either senior policy officers or heads or deputy heads of units leading the 64 sampled regulatory issues were formally invited to participate in the research project. In total, we conducted 48 interviews covering 40 of these regulatory issues. Subsequently, we contacted all the umbrella groups mentioned by Commission officials as key actors when developing the 40 regulatory issues. Ultimately, we conducted interviews with 32 out of the 58 umbrellas invited to participate.

20 Previous studies have looked at member involvement in either economic (e.g., Greenwood, 2007) or citizen organizations (e.g., Warleigh, 2001), but do not compare them in a single research design (but see Rodekamp 2014). However, the representative mechanisms of different type of groups might differ (Halpin, 2006), and thus it is necessary to account for the nature of the umbrella.

21 We also created a code labeled as 'unequal preferences among members', but this has been discarded in the findings due to lack of support in our data. As reported below, most of the umbrellas note that their members have similar preferences.

22 Twenty-five out of the thirty-two leaders interview note that their members have "similar" or "very similar preferences".

23 Seventeen out of twenty respondents that answered the closed question "in general how easy or difficult it is to establish policy positions among your members", indicated that it was easy or very easy. Yet, as discussed below, this easiness is very much dependent on the issue at stake.

24 In fact, there is only one umbrella that described a different perspective in setting policy positions as they emphasized a bottom-up approach where the members brought the policy issues to the umbrella leadership, who had no power to propose or advance policy positions.

25 Our quantitative data indicates that twenty-five out of thirty-two umbrellas report that their members have either "very different" or "different" resources, while the seven remaining respondents indicated that the umbrella members had either "similar" or "very similar" resources. Additionally, twenty interviewees explicitly mentioned the unequal resources and capacities among members as a factor that affects their involvement in the process of establishing policy positions.