Learning from Abroad: The Role of Policy Transfer in Contemporary Policy-Making

DAVID P. DOLOWITZ* AND DAVID MARSH**

In recent years there has been a growing body of literature within political science and international studies that directly and indirectly uses, discusses and analyzes the processes involved in lesson-drawing, policy convergence, policy diffusion and policy transfer. While the terminology and focus often vary, all of these studies are concerned with a similar process in which knowledge about policies, administrative arrangements, institutions and ideas in one political setting (past or present) is used in the development of policies, administrative arrangements, institutions and ideas in another political setting.

Given that this is a growing phenomenon, it is something that anyone studying public policy needs to consider. As such, this article is divided into four major sections. The first section briefly considers the extent of, and reasons for, the growth of policy transfer. The second section then outlines a framework for the analysis of transfer. From here a third section presents a continuum for distinguishing between different types of policy transfer. Finally, the last section addresses the relationship between policy transfer and policy “failure.”

As the introduction to this collection emphasized, in recent years there has been a growing body of literature within political science and international studies that directly and indirectly uses, discusses and analyzes the processes involved in lesson-drawing, policy convergence, policy diffusion and policy transfer. While the terminology and focus often vary, all of these studies are concerned with the process by which knowledge about policies, administrative arrangements, institutions and ideas in one political system (past or present) is used in the development of policies, administrative arrangements, institutions and ideas in another political system.

Given that policy-makers appear to be increasingly relying upon policy transfer, it is something that anyone interested in, or studying, public policy needs to consider. However, to date there has been little conceptual work on the process: this article is one contribution to efforts to correct this omission. More specifically, our aim is to develop further the conceptual

*University of Liverpool, England
**University of Birmingham, England

framework found in Dolowitz and Marsh (1996): in particular, focusing on the relationship between voluntary and coercive (forced) transfer and the links between policy transfer and policy “success” or failure. As such, the article is divided into four major sections. The first section briefly considers the extent of, and reasons for, the growth of policy transfer. The second section then outlines our revised framework for the analysis of transfer before the third section presents a continuum for distinguishing among different types of policy transfer, and the final section addresses the relationship between policy transfer and policy “failure.” This is particularly relevant because the majority of the studies using policy transfer, including those reviewed in this article, either implicitly or explicitly take it for granted that the process has led, or will lead, to the successful implementation of a policy, program or institution. However, it is becoming increasingly apparent that policy transfer can, and often does, lead to policy failure. So, there is a need to explore the relationship between transfer and policy success or failure.

THE EXTENT OF, AND REASONS FOR, THE GROWTH OF POLICY TRANSFER

While there is no denying that the process of policy transfer is not new, it nonetheless appears that over the past decade or so, as technological advances have made it easier and faster for policy-makers to communicate with each other, the occurrences of policy transfer have increased. To take one example, welfare-to-work and workfare policies and programs clearly have been transferred from the United States to Britain since the early 1980s (see Dolowitz, 1997, 1998, 2000). In fact, in response to Tony Blair’s and Bill Clinton’s “success” in using American-style welfare-to-work programs to reduce levels of unemployment, many European governments have begun adopting British and American welfare-to-work policies themselves. This iterative process, involving the adoption of policies across a number of different nations, and subsequent adaptations within individual nations, illustrates: the prevalence of policy transfer; the role particular individuals and institutions play within this process; and the difficulties associated with attempting to place any particular case of policy transfer into a single category on the policy transfer continuum presented in Table 1 and discussed below.

There are a number of obvious reasons for the growth in transfer. As the globalization literature demonstrates, no nation in the industrialized or industrializing world can insulate its economy from global economic pressures. As Parsons puts it (1996, 234):

As the world economy in particular is transformed by new modes of production and trade, and as transnational corporations and institutions come to exercise more influence and power, so the capacity of national policy-makers to frame their own agendas is diminished. Public policy now takes place in a world system as well as in national political systems.
However, global economic forces are not the only pressure toward policy transfer; the rapid growth in communications of all types makes exchange of ideas and knowledge much easier. Similarly, as mentioned in the introduction to this collection, international organizations, such as the European Union (EU), the International Monetary Fund (IMF) and the World Bank, advocate, and at times enforce, similar policies across diverse countries.

Taken together, these changes, by subjecting countries to similar pressures and expanding the amount of information available to policy-makers, have meant that policy-makers increasingly look to other political systems for knowledge and ideas about institutions, programs and policies and about how they work in other jurisdictions.

A FRAMEWORK FOR ANALYZING POLICY TRANSFER

Not surprisingly, the increase in the occurrence of policy transfer has led students of comparative politics, public policy, organizational sociology and developmental studies to focus on the process. However, relatively few of these studies identify the process directly; that is, they describe the transfer of ideas or policies between countries but do not analyze and explain the processes involved. In addition, there are even fewer studies that attempt to put the process within a broader conceptual framework.

As will be discussed below, placing policy transfer into a conceptual framework can advance our understanding of concepts such as what motivates policy-makers to engage in the policy transfer process? (For example, is it ideological or practical?) Do different actors get involved at different stages of the policy transfer process? When is policy transfer likely to occur within the policy-making cycle? How does the type of transfer vary depending upon when it occurs within the policy-making cycle? (For example, is it more likely to be inspirational transfer during the agenda-setting stage while a mixture during the policy-formulation stage?) Do different agents of transfer engage in different types of transfer? (For example, do politicians attempt to copy “foreign” models while bureaucrats work at developing new programs based upon a mixture of different ideas and programs?) Thus, placing policy transfer into a broader conceptual framework will help researchers examine the process of policy transfer and help themselves and practitioners evaluate the “value added” aspect of the concept.

The Dolowitz and Marsh Model

There have been a limited number of attempts to develop a framework to analyze the process of policy transfer; most focusing on a series of questions that studies of the process need to address (Bennett 1991, 1992b; Dolowitz and Marsh 1996; Dolowitz 1998; Rose 1991, 1993). Here, we
build on our own framework, which is the most recent and is based on a critical appreciation of the attempts of others, especially Rose and Bennett. Our current framework is organized around six questions (See table 1), five of which provided the focus of our original article: Why do actors engage in policy transfer? Who are the key actors involved in the policy transfer process? What is transferred? From where are lessons drawn? What are the different degrees of transfer? What restricts or facilitates the policy transfer process? Here we include a new question, which has arisen from our research: How is the process of policy transfer related to policy “success” or policy “failure”? In this article we further examine the second, third, fourth and fifth questions in an attempt to move the debate surrounding policy transfer forward. Then we focus on two crucial issues: the distinction between voluntary and coercive transfer and the relationship between policy transfer and policy failure.

However, another prior problem needs brief consideration. It could be argued that generating a series of questions is of limited utility; that, at best, it provides a way of organizing research but does not show that the concept has explanatory power. We have problems with such an argument. Of course, policy transfer can be treated as either a dependent or an independent variable; we can seek to explain the process of policy transfer or we can use policy transfer to explain policy outcomes. However, the two exercises are related. Put simply, if one wishes to use policy transfer to explain policy outcomes, then one also needs to explain what causes transfer; so, a full analysis would treat transfer as both a dependent and an independent variable. This point is easily illustrated. Why a lesson is drawn, where a lesson is drawn from and who is involved in the transferring process all affect both whether transfer occurs and whether that transfer is successful. So, for example, if a government searches hurriedly for a solution to an urgent problem, it is more likely that there will be transfer, because the need for a “solution” is imperative, but less likely that the transfer will be successful, because limited time will inevitably lead to a limited search for models, and thus probably to flawed transfer. Similarly, if the search for a policy involves not only politicians and bureaucrats but also interest groups that represent those people whom a policy would affect, then there may well be fewer implementation problems once the policy is transferred. These are merely examples. Our key point here is broader. In our view, in order to use policy transfer as an explanatory variable, we also need to understand and explain the process of transfer; focusing on the questions that form the basis of our framework allows us to begin to understand that process.

Who Is Involved in the Policy Transfer Process?

While examining who is involved in the process might seem like a mundane research concern, it raises important empirical questions regarding the degree to which transfer occurs and to what extent countries can
<table>
<thead>
<tr>
<th>Why Transfer? Continuum</th>
<th>Who Is Involved in Transfer?</th>
<th>From Where</th>
<th>How To Demonstrate Policy Transfer</th>
<th>How Transfer leads to Policy Failure</th>
</tr>
</thead>
<tbody>
<tr>
<td>Voluntary</td>
<td>Direct Imposition</td>
<td>Past</td>
<td>Within-a Nation</td>
<td>Uniformed Transfer</td>
</tr>
<tr>
<td>Mixed</td>
<td>Elected Officials</td>
<td>Internal</td>
<td>State Governments</td>
<td>Media</td>
</tr>
<tr>
<td>Coercive</td>
<td>Policies (Goals)</td>
<td>Cross-National</td>
<td>International Organizations</td>
<td>Uniformed Transfer</td>
</tr>
<tr>
<td>Lesson Drawing (Perfect Rationality)</td>
<td>Programs (content)</td>
<td>Copying Complexity (Newspaper)</td>
<td>Policy (Newspaper)</td>
<td></td>
</tr>
<tr>
<td>Lesson Drawing (Bounded Rationality)</td>
<td>Global City Governments</td>
<td>Emulation</td>
<td>(Magazine) (TV) (Radio)</td>
<td>Uniformed Transfer</td>
</tr>
<tr>
<td>International Pressures</td>
<td>Bureaucrats Civil Servants</td>
<td>Emulation</td>
<td>Past Policies Reports Incomplete Transfer</td>
<td></td>
</tr>
<tr>
<td>(Image)</td>
<td>Institutions</td>
<td>Local Authority</td>
<td>Mixtures Structural Institutional Feasibility</td>
<td>Inappropriate Transfer</td>
</tr>
<tr>
<td>(Consensus)</td>
<td>Ideologies</td>
<td>Inspiration</td>
<td>Conference Meetings/Visits</td>
<td></td>
</tr>
<tr>
<td>(Perceptions)</td>
<td>Conditioning</td>
<td>(Ideology) (cultural proximity) (technology) (economic) (bureaucratic) Language Statements (written) (verbal)</td>
<td>Inappropriate Transfer</td>
<td></td>
</tr>
<tr>
<td>Conditionality</td>
<td>Pressure Groups Political Parties</td>
<td>Conditioning</td>
<td>Conditioning</td>
<td>Inappropriate Transfer</td>
</tr>
<tr>
<td>(Loans)</td>
<td>Institutions</td>
<td>Conditioning</td>
<td>Meeting/Visits (I)</td>
<td>Inappropriate Transfer</td>
</tr>
<tr>
<td>(Conditions Attached to Business Activity)</td>
<td>Ideologies</td>
<td>Improvement</td>
<td>Meeting/Visits (II)</td>
<td>Inappropriate Transfer</td>
</tr>
<tr>
<td>Obligations</td>
<td>Policy Entrepreneurs/Experts</td>
<td>Improvement</td>
<td>Meeting/Visits (III)</td>
<td>Inappropriate Transfer</td>
</tr>
<tr>
<td></td>
<td>Attitudes/Cultural Values</td>
<td>Improvement</td>
<td>Meeting/Visits (IV)</td>
<td>Inappropriate Transfer</td>
</tr>
<tr>
<td></td>
<td>Consultants</td>
<td>Improvement</td>
<td>Meeting/Visits (V)</td>
<td>Inappropriate Transfer</td>
</tr>
<tr>
<td></td>
<td>Think Tanks</td>
<td>Improvement</td>
<td>Meeting/Visits (VI)</td>
<td>Inappropriate Transfer</td>
</tr>
<tr>
<td></td>
<td>Transnational Corporations</td>
<td>Improvement</td>
<td>Meeting/Visits (VII)</td>
<td>Inappropriate Transfer</td>
</tr>
<tr>
<td></td>
<td>Supranational Institutions</td>
<td>Improvement</td>
<td>Meeting/Visits (VIII)</td>
<td>Inappropriate Transfer</td>
</tr>
</tbody>
</table>
choose to engage in the process. For example, most prior research has, implicitly or explicitly, argued that there are borrowers and lenders and that these roles seldom change (Robertson 1991; Robertson and Waltman 1992; Rose 1993). However, this is not a universal rule; often countries classified as lenders draw lessons while countries classified as borrowers act as models for other political systems. For example, it is clear that Canada (a country normally described as a borrower; see Hoberg 1991) has acted as a model for American tobacco regulations. Similarly, and contrary to the accepted wisdom, a modified version of the English Day Centers for adult offenders was transferred to the United States from Britain during the 1980s, even though this decade is seen as the quintessential period for American exports to the U.K. (McDevitt and Miliano 1992). Thus, an examination of policy transfer must be tempered by an understanding of when and why such generalizations do not always hold true, which helps us recognize that the distinction between countries that are normally lenders and countries that are usually borrowers should not be over-exaggerated.

In our initial conceptualization we identified nine main categories of political actors engaged in the policy transfer process: elected officials, political parties, bureaucrats/civil servants, pressure groups, policy entrepreneurs and experts, transnational corporations, think tanks, supra-national governmental and nongovernmental institutions and consultants. We dealt with the first six in our earlier works and Diane Stone deals with the seventh in this volume. Hence, we shall concentrate here upon the last two categories. First, it is becoming increasingly clear that policymakers, at both the national and international levels, are relying on the advice of consultants, whether individuals or firms, who act as policy experts in the development of new programs, policies and institutional structures. Their role is particularly important because they tend to offer advice based upon what they regard as the “best practice” elsewhere, often paying little attention to the particular context in the borrowing political system. For example, Policy Management Groups (PMGs) are being set up in numerous African countries, with limited consideration of their appropriateness, simply because one particular consultancy firm has been pushing this model into these countries. As a consultant from that firm argued: “The PMGs we have helped to set up in Zambia and are helping to establish in Ghana and a number of other countries, typically consist of about ten professionals . . . led by a permanent secretary and reporting to the cabinet through the cabinet secretary” (Garnett 1997).

Of course, political consultants are not involved simply in the harmonization of political systems around the globe; their role in the policy transfer process is far more complex. For example, when international organizations, such as the IMF and the World Bank, get involved in policy transfer, they often recommend that particular consultants be hired. However, the governments that are forced to turn to these institutions for financial help often can decide which consultant to use, and different
consultants may, to an extent, make different policy recommendations. As such, even within a coercive situation, governments have a degree of freedom to choose the version of economic policy best suited to their situation, regardless of the particular preferences of the international organization.

The role of international consultants makes less clear the distinction between voluntary and coercive transfer. For example, while consultants may “force” a uniform model of market reform upon developing nations, if they are hired by a government, either as the agent of an international aid agency or “independently,” such a situation clearly has elements of both voluntary and coercive transfer. In fact, over time, as a relationship among the three institutions develops, the mixture of voluntary and coercive elements may change, further complicating the study of policy transfer.

Second, international governing organizations (IGOs), such as the OECD, G-7, IMF and the UN and its various agencies, are increasingly playing a role in the spread of ideas, programs and institutions around the globe. These organizations influence national policy-makers directly, through their policies and loan conditions, and indirectly, through the information and policies spread at their conferences and reports. In addition, international nongovernmental organizations (NGOs) are also increasing their influence over global public policy through their ability to spread ideas and information on an international level. As Gordenker and Weiss (1996, 17–18) put it:

Nongovernmental organisations (NGOs) have in increasing numbers injected unexpected voices into international discourse about numerous problems of global scope. Especially during the last 20 years ... interests have become active in political work once reserved for representatives of states. ... In their own ways, NGOs ... grope ... towards a modicum of global governance. ... NGOs have now become an integral part of the process of setting agendas ... and in carrying the results not only to governments but to other NGOs and individuals.

Clearly, IGOs and NGOs are acting as agents of coercive transfer. However, they are also agents of voluntary transfer, which again complicates any model of policy transfer that may be developed. For example, in October 1993 the British Department of Social Security (DSS) commissioned a research report to examine what lessons could be learned from the operation of social assistance programs in eighteen countries. As the study developed, the OECD became involved to such an extent that the final report was jointly issued by the DSS and the OECD and was entitled *Social Assistance in OECD Countries*. Moreover, once the OECD became involved, it was discovered that Professor Ian Gough of the University of Manchester in the U.K. was already conducting a similar study, and he was also brought on board. This illustrates the difficulties involved in classifying the actors or even the type of transfer involved in any particular case. In addition, it shows how the roles of actors and institutions can, and do, change over time.

Clearly consultants, IGOs and NGOs, unlike most categories of actors involved in the policy transfer process, act as agents of both voluntary
and coercive transfer. More important, both can be used by other actors to help in their efforts to transfer, or force others to transfer, policies. Thus, the activities of these institutions greatly complicate the policy transfer process, particularly if we look at transfer across time, within a political system, or across space, between several political systems.

What Is Transferred?

While almost anything can be transferred from one political system to another, depending upon the issue or situation involved, we identify eight different categories: policy goals, policy content, policy instruments, policy programs, institutions, ideologies, ideas and attitudes and negative lessons. These are essentially the same categories as in our earlier work but with minor modifications, the main of which is the distinction between policy (itself sub-divided into policy goals, policy content and policy instruments) and programs. In most conceptions of the policy transfer process, including our original typology, programs and policies are conflated into a single category. This is clearly misguided. It is important to distinguish between policies, which are seen as broader statements of intention and which generally denote the direction policy-makers wish to take, and programs, which are the specific means of the course of action used to implement policies. As Pressman and Wildavsky (1973, xxii–xxiii) put it: “The word ‘program’ . . . can be conceived of as a system in which each element is dependent on the other. . . . Policies imply theories. . . . Policies become programs when, by authoritative action, the initial conditions are created.” Thus, it should be clear that each policy can have multiple programs, while a program is a complete course of action in and of itself.

From Where Are Lessons Drawn?

Finally, one of the major adaptations made to our original framework presented in Table 1 involves a consolidation of the classification of the levels of governance that actors look to for lessons. In essence, we argue that policy-makers can look to three levels of governance: the international, the national and the local. Within a nation, actors engaging in policy transfer can, and do, draw lessons from other political systems or units within their own country. Not only can sub-national units of government draw lessons from each other, but the national government can also draw lessons from lower levels of government, while lower levels of government can draw upon the national government. It is also common for governments and agents to transfer policies from one nation to another. Furthermore, while it is seldom examined, it should be stressed that when drawing lessons from other nations, actors are not limited to looking at national governments but can, and do, look to other sub-national levels and units of government. Lastly, lessons can be drawn from, or forced upon a political system by, the international level.
Degrees of Transfer

Policy transfer is not an all-or-nothing process. While any particular case can involve a combination of processes and agents, there are basically four different gradations, or degrees, of transfer: copying, which involves direct and complete transfer; emulation, which involves transfer of the ideas behind the policy or program; combinations, which involve mixtures of several different policies; and inspiration, where policy in another jurisdiction may inspire a policy change, but where the final outcome does not actually draw upon the original (see also Rose 1993).

It is important to stress not only that the type of transfer will vary between different cases of policy transfer but that the type of transfer involved in any particular case depends upon factors such as who is involved in the process and where within the policy-making process transfer occurs. Thus, it is possible that, while politicians tend to look for “quick-fix” solutions and thus rely upon copying or emulation, bureaucrats, on the other hand, are probably more interested in mixtures. Similarly, it is possible that, while emulation is crucial at the agenda-setting stage, copying or combining several different policies or programs may be more applicable at the policy formulation or implementation stage of the policy-making process.

A POLICY TRANSFER CONTINUUM

To establish a simple distinction between voluntary and coercive transfer is to oversimplify the process. Rather, we suggest that it is better to conceptualize transfer as lying along a continuum that runs from lesson-drawing to the direct imposition of a program, policy or institutional arrangement on one political system by another (see Figure 1).

FIGURE 1
From Lesson-Drawing to Coercive Transfer
Of course, this continuum is a heuristic device that allows us to think more systematically about the processes involved. It helps for two related reasons. First, it identifies categories that can be used by researchers to frame their empirical work. As already discussed, given the complexities associated with the study of policy transfer, this is extremely important. Second, many cases of transfer involve both voluntary and coercive elements; the continuum helps us acknowledge that fact and thus again deepens our knowledge of the process. For example, knowing that a case of policy transfer involved coercive and voluntary elements, as was the case with Britain’s adoption of American-style workfare programs during the mid-1980s, it should be possible to see how its pattern of diffusion changed from this point. So, after Britain’s initial adoption of American-style workfare, European countries began looking to American and British workfare programs; some, such as Belgium, were doing so voluntarily; others, such as Norway, were doing so because of a perception amongst key policy-makers that they were falling behind an international trend. Thus, by using a continuum, researchers can capture some of the subtleties involved in the transfer process, such as if the transfer remained voluntary or transformed into a more coercive process over time, or even varied between different political units within the same political system.

While the continuum is fairly straightforward, there are some aspects that deserve closer attention. First, the lesson-drawing end of the continuum is based upon the view that actors choose policy transfer as a rational response to a perceived process. So, the emergence of a problem, or of “dissatisfaction with the status quo,” will drive actors voluntarily to engage in an active search for new ideas as a “cheap” means of solving the problem. As Rose puts it, “The process of lesson-drawing starts with scanning programmes in effect elsewhere, and ends with the prospective evaluation of what would happen if a programme already in effect elsewhere were transferred here in future” (Rose 1991, 3; emphasis added).

Despite the assumption of rationality inherent in most studies of policy transfer, it is rare that actors are perfectly rational. Most act with limited information, or within the confines of “bounded rationality.” At the same time, actors are influenced by their perceptions of a decision-making situation rather than the “real” situation. As such, transfer may be based upon an inaccurate assessment of the “real” situation; in particular, it may be based upon incomplete or mistaken information about the nature of the policy and how it operates in the transferring political system or about the difference between the relevant economic, social and political consequences in the transferring and the borrowing systems. Hence, this represents a subset of transfer: transfer based upon incomplete information, etc.

Moving toward the coercive end of the continuum, we have already identified cases in which transitional organizations and international aid agencies have been able to compel governments to adopt programs and policies against their will. However, it is also worth examining the ways
national governments can be forced to adopt programs and policies as part of their obligations as members of international regimes and structures: obligated transfer. Few studies in the transfer literature have looked at such cases to date. Of course, there are problems with such a classification. For example, within the European Union, the Court of Justice can force member states to comply with European policy and directives as part of their obligations to the Union (Shapiro 1992). However, since individual nations voluntarily joined the Union, can any act of the EU be considered coercive in terms of policy transfer? At the same time, each nation has influence over the adoption of all EU policies. As such, they actively and voluntarily shape and adopt the edicts of the Union; it is for this reason it is best viewed as obligated and, to an extent, negotiated transfer.

It should be clear from this review that many instances of policy transfer will lie somewhere in the middle of the continuum. However, it is clearly difficult to place particular cases, and the worth of the continuum will only be shown if it is utilized by, and is useful to, researchers.

A brief examination of the development of the U.K. workfare system over the past eighteen years in the context of our earlier discussions can be used to illustrate the use of the continuum and show how case studies can be located in relation to it. In the mid-1980s the Thatcher government began facing mounting electoral pressures due to the rise in the level of unemployment and Britain’s falling international competitiveness in industrial output and education and training. The government’s initial response was to adjust the unemployment statistics by developing “make-work” programs. However, as it became apparent that this was not working they turned to policy transfer, initially developing the Restart program and opening Job Clubs. It should be clear that the imetus for turning to American welfare-to-work programs at this point was a mix of voluntary and coercive forces. Certainly, the twin fears of losing the next general election and of falling behind the international market for jobs and products put pressure on the government to find solutions. The government had considerable autonomy as to both whether it responded to such pressures and where it looked to for lessons. Over the course of the next ten years the Thatcher, Major and Blair governments continued to borrow and implement various American-style workfare policies and programs, including: the Employment Training Scheme; Training and Enterprise Councils; the Job Seekers Allowance; and, most recently, the New Deals for 18–24 year olds, the long-term unemployed over 24 years of age and lone parents. Over this period, as unemployment statistics fell and the world economy transformed, the motivation underpinning the borrowing of American policies and programs, and equally important the decision about which policies to borrow, altered. The coercive pressures decreased and voluntary factors became much more important. This can be seen in the Major government’s decision to introduce the Job Seekers Allowance and the Blair government’s
decision to implement the American Earned Income Tax Credit, as the Working Families Tax Credit (which falls as close to the purely rational end of the continuum as a policy is ever likely to).

It should be stressed, though, that, while the motivation for transferring individual programs began to shift, the Blair government’s overall motivations for continuing the Conservatives’ workfare policies still reflected a response to perceived external coercive pressures. This is clearly illustrated in a speech to the Socialist Leaders’ Congress in Malmo, Sweden, 6 June 1997, in which Tony Blair argued that Britain needed to retain flexible labor market policies so that it would not be at a disadvantage in relation to the economic challenges presented by the “tiger economies” of Southeast Asia.

As this review demonstrates, in order to understand policy transfer it is necessary not only to see what was transferred but also to consider the motivations involved; the continuum helps in this task. First, the continuum demonstrates that generally it is not enough to examine transfer as if it were an all-or-nothing process. Rather, longitudinal studies are required to capture the shifting motivations involved. These studies illustrate that policies borrowed from other political systems, particularly when they have been borrowed in an attempt to transform an existing set of structures, develop over time and that much of this development involves a mixture of voluntary decisions and coercive pressures.

Second, in order to understand where a case falls upon the continuum it is important to identify the key actors because different actors will have different motivations. So, as a general rule, it is probable that when politicians or policy entrepreneurs institute the process they will be doing it voluntarily. While it will seldom be a completely voluntary or rational process, it will be less coercive than if other actors institute the process. While politicians are likely to institute a search for new ideas voluntarily, when international organizations become involved in the process, it is likely to result in some form of coercive policy transfer. However, it should be stressed that the particular activity in question must be understood. When aid agencies are making loans it is likely to lead to coercive policy transfer. At the same time, when these same organizations hold conferences or issue reports it is more likely to lead to a form of voluntary policy transfer.

Third, it should be clear that different policies and programs will naturally result from different motivations. For example, most of the programs transferred in the development of the British workfare policy were either self-contained, such as Job Clubs, or could be established and controlled by the government independently of outside actors or institutions, such as the Working Families Tax Credit. These types of policies are more likely to be voluntarily transferred than those that depend upon outside organizations, particularly international organizations.
Finally, when policy transfer occurs it is likely to affect the motivations of the actors engaging in the process. For example, if policy transfer is undertaken during periods of social, political and economic stability within a nation such transfer is likely to be voluntary. However, if there is some form of political crisis, then policy transfer is likely to have some coercive elements. Equally, if there is some form of “global” crisis, such as the economic downturn during the mid-1980s, actors are more likely to feel some pressure to engage in transfer. This will also happen if there is some form of international movement toward an acceptable policy, such as the global spread of privatization programs and workfare policies. Moreover, during wars, or in the immediate aftermath of a war, the losing political system is more likely to have policies, programs and even institutions imposed upon them from the outside; here the case of the imposition of a new constitution on Japan after World War II is illustrative.

POLICY TRANSFER AND POLICY FAILURE

While most studies of policy transfer concentrate upon success there is a need to acknowledge that not all transfer is successful (for example, see Bennett 1992a; Dolowitz 1998; Rose 1991). In our view, it is important to examine why some transfer is unsuccessful; that is, to identify which factors are related to successful or unsuccessful transfer. Obviously, there is a problem with establishing what is “success” or “failure” and future research would need to acknowledge and address this problem (see Bovens and ’tHart 1998). However, at this stage, we shall restrict ourselves to concentrating upon the extent to which policy transfer achieves the aims set by a government when they engaged in transfer, or is perceived as a success by the key actors involved in the policy area.

In cases of lesson-drawing at least, governments borrow policies, institutions, etc., with the expectation that this transfer will lead to policy “success” rather than policy “failure.” Of course, the underlying assumption is that policies that have been successful in one country will be successful in another. However, that is clearly not always the case. In particular, our research suggests that at least three factors have a significant effect on policy failure. First, the borrowing country may have insufficient information about the policy/institution and how it operates in the country from which it is transferred: a process we call uninformed transfer. Second, although transfer has occurred, crucial elements of what made the policy or institutional structure a success in the originating country may not be transferred, leading to failure: we call this incomplete transfer. Third, insufficient attention may be paid to the differences between the economic, social, political and ideological contexts in the transferring and the borrowing country: we call this inappropriate transfer. We can illustrate these three processes by a brief consideration of the British Child Support Agency (CSA).

There were four key reasons the British government decided to transfer the structure of the CSA from the United States: The U.S. and Britain
were facing similar problems within their child support enforcement systems; the Reagan administration and the Thatcher government shared ideological values; the Thatcher government saw the agency as a means of reducing the public sector borrowing requirement (PSBR); and America’s Child Support Enforcement System (CSES) had a long history of “success” in operating child support enforcement agencies.

There is ample evidence that the British government set out to learn from the American experience and that they were aware of, and interested in, the American CSES, particularly the Wisconsin CSES (for more information see Cm 1264 1990; Craig, Glendinning and Clarke 1996). Moreover, it is clear that transfer did occur. Many of the features of the American CSES were incorporated into the CSA. In particular, six of the key functions given to the CSA paralleled those of the U.S. and, in particular, the Wisconsin CSES: to identify and trace liable persons; to withhold welfare benefit from parents who refuse to cooperate with the agency without “good cause”; to use a formula to assess the maintenance to be paid by the absent parent; to record and monitor the payments made; where appropriate, to enforce awards when payments fell into arrears; and to review child support assessments at regular intervals.

Given the size of its Parliamentary majority, the Thatcher government had no difficulty in introducing and passing the legislation establishing the CSA. However, it soon became apparent that the agency was not operating as the government had originally hoped. There was widespread dissatisfaction with the operation of the agency which was reflected in demonstrations, high-profile media coverage and many questions in Parliament (Clarke et al. 1994). In our view these problems resulted partially from policy transfer. More specifically, the government had insufficient understanding of how the American system worked; consequently, failed to recognize how the American CSES relied upon other system variables for its “success,” particularly the continuing importance of the courts in the operation of the U.S. CSES; and regarded the CSA primarily as a means of controlling the Public Sector Borrowing Requirement (PSBR). We shall examine each of these issues in turn as they offer examples of uninformed, incomplete and inappropriate transfer.

Uninformed Transfer: Too Much Reliance on Wisconsin?

Although the British government consciously set out to draw lessons from the United States, they concentrated on the Wisconsin child support enforcement system. This is clearly reflected by a high-ranking official at the Department of Social Security (DSS) who emphasized both that the department studied the Wisconsin model and that it was very clearly “used in the development of the Child Support Agency.”

The key point here is that if there had been a more thorough analysis of how the CSES system worked in other U.S. states, and indeed a more complete analysis of the Australian CSA, which itself drew lessons from
the U.S. experience, then it is likely that the government would have realized both some of the drawbacks of the Wisconsin system and how important the courts remained in the operation of the CSES in most U.S. states.

Incomplete Transfer: The Crucial Role of the Courts

The British government imposed the CSA into and over the preexisting system governing the granting and collection of child support maintenance. In particular, the legislation that established the CSA set aside prior court and DSS maintenance arrangements for those families falling within the remit of the agency. This was bound to cause dissatisfaction, especially amongst couples who had agreed on their existing arrangements. More important, the agency replaced the courts and the DSS, although this was not the case in either the United States or Australia. In doing so, the Thatcher government failed to realize how important the courts and the DSS were in serving as an escape valve for both the agency and the individuals involved. For example, the agency had no discretion in the amount of child support an absent parent was required to pay. Moreover, the formula had to be used, even when couples had come to an equitable agreement within the courts. The impotence of the courts and the DSS meant that individual circumstances could no longer be taken adequately into consideration. This problem was compounded by the fact that, initially, the British formula, unlike that in the United States or Australia, failed to take into account the actual circumstances of the individuals involved. Overall, by failing to learn lessons from the U.S., the government reduced the ability of individuals to comply with the settlements being imposed upon them by the CSA and increased the likelihood that all parties would be dissatisfied with the results of CSA decisions.

It should also be noted that in both the United States and Australia the revised child support enforcement systems were phased in so that any problems, particularly those involving discrepancies between the old and new systems, could be reduced by making necessary changes. If the British government had learned this lesson, instead of simply imposing the CSA immediately onto a preexisting system, the likelihood is that the CSA would have experienced fewer implementation problems.

Inappropriate Transfer: Different Values Lead to Different, Contradictory Aims

In developing the Child Support Agency the Thatcher government made the agency’s prime objective the reduction in benefit expenditure on lone parents. This was part of the government’s overall strategy, inspired by their commitment to neo-liberalism, to reduce the PSBR by attacking government spending, particularly in relation to welfare programs. Indeed, this emphasis was clear from the earliest days of the Conservatives’ interest in the American experience. This emphasis on the primacy
of cutting government expenditure greatly affected the way in which the CSA operated. In addition, and this is crucial to our argument, as Craig, Glendinning and Clarke observe: “in making one objective—the reduction in welfare benefit expenditure on lone parents—paramount . . . [t]he government failed to . . . learn the lessons of relevant experiences from within the UK and elsewhere” (1996, 107).

Indeed, the strategy led to serious implementation failures. For example, by using the agency to reduce the PSBR the government altered the target group most affected by the agency. In the U.S. and Australia the prime groups targeted were individuals who had fallen into arrears or who were not making any child support payments. In Britain, the primary target group became those who could make the biggest contribution to reducing the PSBR. As noted in a leaked agency document: “This is not the time for the cases we know should get early attention. . . . The name of the game is maximising the maintenance yield—don’t waste a lot of time on non-profitable stuff!” (Garnham and Knights 1994, 70).

By going after “soft” targets, instead of non-payers, the agency reduced its legitimacy in the eyes of the public and also drifted away from one of the basic characteristics of the American CSES. In the United States and Australia the child support enforcement systems were not designed “primarily” to reduce public expenditure. Rather, the U.S. and Australia developed their child support enforcement systems to redress the problems inherent in federal systems dominated by the judiciary in the award of child support payments. Most important, when the United States and Australia were developing their systems, officials continually stressed that the major reason for developing the CSES was to address the growing problem of single parents, not the reduction of government expenditure. In fact, in the U.S. the CSES was grounded in policies designed to get single mothers back into the workforce. This was most clearly reflected in the 1988 Family Support Act which developed a system of work, education, training, child care and other support services in order to help single mothers in receipt of Aid to Families with Dependent Children (AFDC) benefits to re-enter the regular job market. This meant that it was easier to generate support for the policy than it was in Britain where it was widely seen as illegitimate to attack parents who were already paying considerable maintenance.

Overall, by changing the primary goal of the agency and focusing on reducing the PSBR, the Thatcher government failed to understand how the CSA’s other objectives would be compromised, leading to significant implementation problems.

CONCLUSION: IS POLICY TRANSFER A USEFUL VARIABLE?

As we argued earlier, policy transfer can be treated as a dependent or an independent variable. The model presented in Table 1 treats it essentially as a dependent variable, as something we need to explain. As such, the
questions the model highlights concern either the characteristics of the transfer or the reasons for the transfer. So, we ask two questions about the characteristics of the transfer. What was transferred? What degree of transfer occurred? At the same time, we focus on three questions about the reasons for transfer. Who transfers policy? Why is policy transferred? What factors constrain or facilitate policy transfer? However, as this article has clearly demonstrated, policy transfer is also a useful explanatory variable to explain policy outcomes.  

Let us be clear about what we are claiming. While the research presented here certainly supports the position that policy transfer is a useful explanatory variable, it clearly doesn’t suggest that policy transfer is the sole explanation of any, let alone most, policy development. All we are suggesting is that an increasing amount of policy development, and particularly policy change, in contemporary polities is affected by policy transfer. As such, when we are analyzing policy change we always need to ask the question: Is policy transfer involved?

Even our earlier brief consideration of the development of the British workfare system and Child Support Agency indicates that it would be impossible accurately to explain that development without recognizing that a significant level of policy transfer was involved. In fact, it would be impossible to understand the development of the British workfare policies of both the Blair government and the previous Conservative ones without appreciating the extent of the policy transfer from the United States involved (see Dolowitz 1997, 1998).

Thus, if governments are searching for policy solutions to new or changing problems, then they are increasingly likely to look for “solutions” abroad. This is much easier than it was in the past because of the growth in all forms of communication; politicians and civil servants from different countries now meet more frequently, in bilateral as well as multi-lateral meetings. At the same time, policy entrepreneurs “sell” policies around the world. International policy networks, advocacy coalitions or epistemic communities develop and promote ideas. As such, there is no doubt that there is a great deal of transfer and that this transfer has shaped policies. Certainly, when examining the development of policy we should always establish whether policy transfer has occurred.

Before concluding, however, it is important to stress that, as we saw in the last section, it is not inevitable that transfer will be successful. As such, while transfer may shape policy change, it may also lead to implementation failure. This means that, even if we can regard policy transfer as a key explanatory variable in the development of many policies, we must also recognize that it is important to follow each policy through to see whether uninformed, incomplete or inappropriate transfer leads to policy failure.
Notes

2. For a much fuller defense of this framework see Dolowitz and Marsh, 1996.
3. Information relayed to the authors during a conference at the University of Manchester, 30 June 1997.
4. While not the purpose of this article it should be stressed that the model of policy transfer presented within this article can greatly expand our understanding of the policy-making process. This signifies a potentially critical turn in theories of public policy because it allows them to overcome the confines of the rational-technocratic model which dominates the literature associated with both policy-making and policy transfer. Briefly, the rational conception of a policy process, involving rational actors pursuing clear goals in the course of solving problems, does not reflect reality, and the model, particularly the policy transfer continuum, helps illustrate and overcome this limitation.

References


