Future Governance and the Literature on Policy Transfer and Lesson Drawing*

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Introduction

One of the exciting things about this Programme is that we have people on it from a variety of social science disciplines. As such it offers great prospects for a different sort of transfer — developing insights and theoretical perspectives associated with one branch of social sciences within another. However, for the purposes of this paper I will be setting out some of the things I think the political science/public policy/public administration literature has to say about the type of research the projects in the programme is seeking to do.

The paper is not intended as a comprehensive review of policy transfer and related literatures. Neither is it a set of instructions or recommendations. "What we ought to do" type pieces, especially those that tell us how we should be more theoretical and those that tell us what we should be looking at in our empirical research can often be tiresome. Moreover, any such musings would be redundant here because the 30 projects have very clear ideas of what they are doing. Rather the paper is intended to outline some of the major issues in the literature as I see it, and to help the discussion in this session. No claim is made for the originality of this paper — many of the issues are covered in other works on the subject, above all Rose (1993). Please remember that this paper was drafted at short notice as an aid to discussion at a meeting, itself convened fairly rapidly in response to your requests.

The paper will be in four parts. The first will deal with definitions — what policy transfer and lesson drawing are, what we might expect a literature on these topics to do and where we might find it. This section highlights three valid expectations we might have when we approach such literature — that it sets out the variables we are going to look at, identifies broader theoretical issues and allows us to identify gaps in our knowledge or understanding. The second section looks at these three expectations in the context of the literatures on lesson drawing, and the third looks at them in the context of the

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literatures on policy transfer. The final section sets out some general concluding comments about the projects and the wider literature.

I — Clarifying terms

The central defining feature of what we are all doing is that policy transfer and lesson-drawing are about the transposition of policies and/or practices *already in operation* in one jurisdiction to another. While some studies of transfer look at drawing lessons across-time, the focus of this programme is about how practices can and may cross jurisdictions. Moreover, the "already in operation" stipulation means that we are not looking at *any* trade in ideas developed but never applied in one country, otherwise we might argue that the Russian Revolution was a British/German/Belgian transfer, depending on how we describe the nationality of Marx's ideas.

As such the range of projects in the Programme touch on four related main issues: a) the operation of the policies or practices in the country from which lessons are to be drawn (let us call this the "exporter" jurisdiction; b) the identification of these policies or practices as worthy of emulation by other countries (let us call these "importer" jurisdictions); c) the application, whether in modified form or not, of the policies or practices in the importer jurisdictions; and d) the operation of the policies in importer jurisdictions.

The emphasis of the *policy transfer* literature (see Dolowitz and Marsh 1996) has tended to be on understanding the process by which policies and practices move from exporter to importer jurisdictions, above all the agents of policy transfer or, in the case of the diffusion of innovation literature, the patterns by which practices spread. Here the prime object of the analysis is to throw light on decision making processes. This is not to say that the purpose is purely intellectual, an understanding of the process may also have direct practical implications — that some ways of transferring policies and practices are better or worse than others. The focus of this literature is on issues b) and c) — the processes of decision making in the importer jurisdictions.

The emphasis of the *lesson-drawing* literature (see Rose 1993) is on understanding the conditions under which policies or practices operate in exporter jurisdictions and whether and how the conditions which might make them work in a similar way can be created in importer jurisdictions. Here one of the prime objects is to engage in policy transfer — to use cross-national experience as a source of policy advice. However, the practical purposes are also supplemented by the academic-theoretical objective of understanding the distinctive political, administrative, social, economic or cultural conditions that sustain cross-national policy differences. For example, to examine how French patterns of family policy might be applied to Greece generates an understanding of the way in which broader cultural values affect family policy in both nations (Hantrais 1997). In the lesson-drawing literature, the focus of the analysis is on issues a), c) and d): how policies operate in the exporter jurisdiction, how they may be applied in the importer jurisdiction and what modifications are needed to transpose between them.

Viewed in this way the literatures relevant to the programme are diverse. Comparative government and politics, comparative social and public policy, public policy analysis, comparative law, anthropology, sociology, economics and so on. Let me narrow things down a bit by thinking about what a discussion of the literature can usefully do. While it would be good to have sets of shortcuts and specific pieces of advice on how to do the research, and while there may be such things in the literature, these are likely to be highly specific to the individual project in hand and not easily discussed in a more general paper. Let me set out three objectives for looking at the literature connected with policy transfer and policy learning. All three objectives derive from the broad goal of making sure that the analyses

contained in the 30 individual projects relate to topics and concerns that are taken up in a broader literature. We may look at the literature in order to

+ Highlight the variables that individual studies have highlighted and which researchers should be aware of in the field of learning and transfer.
+ Highlight the general issues and hypotheses that are thrown up by this literature
+ Highlight major gaps in the literature

I think it is good at this early stage in the Programme to think about these things not only from the point of view of informing thinking about the development of individual projects, but also thinking ahead. Articles and books have to be written, and one central ambition of the Programme is to give the comparative analysis of public policy and lesson-drawing a more prominent role across the social sciences (as well as in contemporary policy debates) and one way in which the projects can reach a wider audience is to address the wider literature; if the projects can say something about the variables, the general issues and fill gaps in the literature it can reach a wider audience in addition to the audience that it will have as a piece of research on a particular area of public, social, economic or other type of policy. What I have to say looks through policy transfer and lesson drawing from each of these three perspectives.

II — Policy transfer

a) Variables

If we think about the focus on the study of how policies in exporter jurisdictions are identified as worthy of emulation and how they are applied in importer jurisdictions. The variables covered in the literature are related to the very basic questions of who, what, why, where and how policy transfer takes place.

i) Who

Who actually conducts the transfer has received a lot of attention. In what way can this be a variable? It can be a variable according to the collective effort and organization that is involved in the activity of identifying policy ideas and exporting or importing them. An obvious starting point is the single individual as an agent of transfer (Mintrom1997). The role of "key" people may itself be divided into a variety of distinctive types of individual according to, say, organizational affiliation (see Rose 1993, pp. 52-57). However, one crucial distinction when we come to consider the agents of transfer is that between the true "policy entrepreneur" and the individual, to continue the analogy, "policy salaried employee". The difference between the two relates to the "how" variables discussed below, and refers to the degree to which the transfer is initiated by the individual concerned. The entrepreneur identifies the policies or practices to be transferred and persuades or otherwise moves others to adopt them — Heclo (1974: 309) terms these "policy middle men, "leading figures in mediating a market for ... policy ideas". The salaried employee is given instructions to look at practices elsewhere and make recommendations based on them. An example of the policy entrepreneur would be, in Heclo's terms, Richard Titmuss. An example of the policy salaried employee would be Kawaji Toshiyoshi, the "father of the Japanese police" who, as head of the Tokyo force, was sent to Europe in 1872 to examine how the French model could provide the basis for reform in Japan (Westney 1989, pp.40-43).

The *individual*, whether acting on his or her own initiative or under instructions, is at one end of a continuum of the agents of policy transfer — at the other end of this continuum are *organizations* involved in policy transfer. Think tanks (Stone 200) and international organizations such as OECD,

the World Bank, NATO and the European Union take up models of "good practice" and use them as models for other nations to adopt (Stein 1994). Other "collective" agents of policy transfer also appear in the literature: concepts relating to the notion of "policy networks" are the focus of some studies — usually informal grouping of individuals belonging to different organizations who have a common interest in particular policy questions. According to Coleman and Perl this may take the form of a "transnational expert community ... mediating between national and transnational communities" (Coleman and Perl 1999, p. 708), for Evans and McComb (1999) it is "an epistemic community who have similar professional beliefs and standards of judgement and share common policy concerns".

The relationship between individual entrepreneur and collective organizations is often not made very clear because of the difficulties of understanding precisely how an idea came on to the agenda of an organization. Often circumstantial evidence is used — Sir Peter Kemp knew about the arrangements for agencies in Sweden and this was taken to mean that is likely that he borrowed from the Swedish model when setting up the Next Steps initiative (McDonagh 1990). Majone's (1991) study of cross-national influences in regulatory policy explains, for example, the influence of US examples on the German economics minister "Ludwig Erhard and his advisers" in shaping the 1957 *Bundeskartellgesetz* rather than tracing the throughout processes of the individuals involved. We must be careful, however, not to raise this idea that failure to establish the precise process by which groups and organizations come to endorse or promote particular policies or practices is a major failing in the transfer literature. While there are the theoretical tools by which we may link individual advocacy to collective sponsorship (notably in the "advocacy coalition" framework of Paul Sabatier (see Sabatier and Jenkins-Smith 1993), the more transfer becomes concerned with this particular question, the further the study moves away from the question of *transfer* and the closer towards a study of intra-organizational power.

ii) What

What is being transferred is also a variable, well discussed in Rose's (1993, p. 30) categorization of five different types of learning. At the one extreme is direct copying, where the programme or policy is transferred lock, stock and barrel from one jurisdiction to another; at the other extreme is "inspiration" according to which a policy in one jurisdiction is based on an idea identified in another. In between these two extremes come "adaptation", "creating a hybrid" and "synthesis". Here what is being alluded to is a policy as a set of ideas, institutions and practices; the degree to which they are identical in the exporter and exporter jurisdictions shapes what particular label we give to the transfer in respect of what is transferred.

In the study of transfer, this issue is likely to be more problematic than in the analysis of lesson drawing since in the latter it is up to the analyst to set out what precisely is being borrowed. In the study of transfer, ascertaining precisely what was borrowed is far more difficult to determine. The perception of how the policy operated in the exporter jurisdiction might be crucially shaped by the observer from outside who seeks to import it. When Rudolf von Gneist set out the benefits of the English local government system as a means of influencing German practice, his interpretation of the way in which it worked was in places eccentric. Moreover, as Bennett (1991) points out, "foreign evidence" can be a post-hoc or validating gesture to facilitate a set of proposals that owe little to cross-national policy transfer, making it difficult to determine what, if anything, is being transferred.

Here the difficulty is in unravelling the precise contribution of one strand — that provided by the practices observed in another country or other countries — in the complex mixture of ideas, issues, compromises and practices that go to make up "policy". It comes back to a fundamental question of studies of policy transfer: establishing causality.

iii) When

The concept of policy transfer says little about the time period. As many of the project in the Programme make clear, transfer is not necessarily based on a single act: a study trip to an exporter jurisdiction or a report based on a set of foreign examples. Policy transfer may take place over more extended time periods. One of the most significant instances of transfer for the modern European state, the "reception" of Roman Law took centuries (Koschaker 1966). More recently, the adoption of trends such as liberalization and "new public management" are observed over many years rather than a single point in time (Lawton 1999, Wright 1995).

The central variable here, then, is the time period taken as the period of "transfer". This is likely to have an impact on many of the other variables mentioned in this section; as the time period becomes extended the people involved are likely to increase, the similarity between the policies of exporter and importer jurisdiction can grow or diminish. Westney's (1987:122) analysis of Japanese borrowing from Europe and America in the nineteenth and early twentieth centuries makes this clear

> Initial adaptations of the British model proved inadequate, led to a series of structural adjustments.... [the organizational model] could be emulated and adapted, but when it came to integrating the organization into the state regulatory structures, some major problems emerged. In the case of the postal system, those problems took decades to solve, and took a serious toll on the expansion of the post

One might expect, on the basis of casual observation of innovations such as "drugs czars" (Quayle 1999), that the shorter the time period, the more likely an innovation is likely to appear as an alien import; over a longer time period the innovations become domesticated as the relationship between established institutions and policies shapes their development.

iv) Why

Perhaps the most common variable in the policy transfer literature is the question of "why" countries borrow, one from the other. Dolowitz and Marsh (2000) highlight the continuum between coercion and voluntary adoption as the central focus of their framework. This echoes the concern in the economic literature with issues of "conditionality" (for a discussion of the legal-constitutional implications see Meng 1988); countries, usually developing countries, are forced to adopt practices identified as good practice as a condition of receiving a loan or a grant (Hopkins et al 1997). At the other end, it is possible for a country to be a "rational shopper" — "we've looked everywhere and this seems to be the best" (Bennett 1991; Westney 1987).

Coercion, in the traditional sense of country or organization A creating sufficiently strong incentives to country B to adopt a specific set of policies, is not the only form of involuntary transfer. Numerous circumstances can be envisaged when a country has little choice but to introduce a policy, but where it is difficult to talk about coercion being exercised by another organisation or country. For example, it is logically possible for a country to act as a rational shopper, looking around for the best package of grants and conditions on offer, in drug eradication programmes. Another example of a mix of coercion and voluntary transfer comes in the international regime of dual-use goods, to which the UK among many other nations belongs, requires that the UK introduces bans on goods with a possible military purpose (that may have been introduced in other jurisdictions already) on the basis of international agreements implemented, but not devised by, the European Union. Those that implement this regime domestically do not see themselves as being coerced. Insofar as coercion implies a recalcitrance

on the part of the importer jurisdiction, it is not the only circumstance under which transfer is not voluntary. Coercion versus voluntary transfer is unlikely to be a simple variable, and not reducible to one dimension.

A second part of the question of "why" is the question of the circumstances under which a country borrows from another. This question applies whether the transfer appears to involve some degree of coercion or not, but probably requires a more elaborate answer where the importer jurisdiction shows signs of exercising choice in the employment of foreign models. There are a variety of candidates for explaining why an importer country searches for programmes or inspiration in other jurisdictions — these may be the characteristics of the importer jurisdiction (for example there is a perceived need to develop policies quickly, see Westney 1987); the characteristics of the policy (for example if there is a fad or fashion for introducing changes in this area, as with the body of reforms frequently grouped under the heading "new public management" See Wright 1995) or the characteristics of the exporter jurisdiction (for example, if the Americans have banned the export of a particular product covered by dual use conventions, another country might as well follow suit before it has to, see also Bennett 1991).

A third dimension of the "why" question relates to the type of objectives pursued by the transfer. A programme or set of practices may be imported because of their intrinsic programmatic benefits (i.e. that they represent a desirable way of running programme or institutions) or because of their ability to add weight or support to policies that have little direct relation to what is being evoked. Bennett (1991) sets out several reasons why governments might use foreign examples including putting items on the political agenda, mollifying domestic political pressure, and legitimising decisions already taken in addition to the objectives of searching for the best policy or emulating the actions of an exemplar.

A fourth dimension of the "why" question relates to the importer jurisdiction's particular choice of country from which to borrow (this could be a separate "where" variable, but is closely tied to the other dimensions of "why" that it is best regarded as a sub-category. The types of answer to this question are likely to be diverse. Ideological proximity between governments is a common explanation, especially when discussing the imports into Britain of the Conservative governments between 1979 and 1997 (Dolowitz 1997; Hall 1981). The choice of a particular country may be coincidence rather than design — Maeijima, the official who played a large part in the importation of the British postal system into Japan, went to England to negotiate a railway loan and, on his own initiative, gathered information on the postal system since it impressed him (Westney 1987). Country selection may be the result of a more considered choice; while Japan may not have been the "rational shopper" for innovations from Europe and America, some of the choices reflected conscious deliberation. Choices might also be limited by previous choices or choices in other related areas —example, Japan started to borrow from the German system of policing because it had already borrowed its local government and legal system from there (Westney 1987).

v) How

If we switch to the question of how a set of policies or practices came to be adopted by an importer jurisdiction, the answer might lie in the "why" variable. If a country was forced to adopt a set of practices, then to a large extent the answers to how and why are likely to be the same. Yet if we are talking about a process of transfer which involved substantial discretion and choice by the importer jurisdiction this leaves open the question of the circumstances under which lessons were sought.

A voluntary process of searching for good practice might vary according to the degree to which

the search was a collectively organized procedure. The borrowing from European examples in Meiji Japan exhibits examples of both types of process. In the police service, a conscious choice was taken by the Japanese state to emulate European, specifically French, practice. The adoption of the British postal system was a more "casual" emulation rather than the

> product of a deliberate selection process. Instead, the British technicians who were hired to introduce the complex technology of the telegraph ... were asked to write the regulations for the daily operation of the system.; They naturally reproduced as closely as possible the basic organizational structure of the British telegraphs. Even the hiring of British technicians had a strong element of the fortuitous...." (Westney 1987, p. 111)

Recent studies of policy transfer in areas point to even more diffuse, and certainly less collectively organized processes of transfer. For Lawton (1999) the transfer of airline liberalization progressed over a whole decade and involved a variety of institutions and agencies: the European Parliament, the European Commission, the European Court of Justice, the airline carriers and the arrangements for bilateral agreements between member states. The process is at least as diffuse and multifaceted, perhaps even unconscious on the part of those involved, in Teague's (1999) discussion of employment regimes in Europe as those devising national schemes adopt practices from other jurisdictions

> The outcome is a fusion process whereby national employment policy becomes heavily Europeanised without obliging member states to harmonise domestic labour market institutions ... Dissatisfaction with traditional models has intensified search, cross-national evaluation formalised in EU social policy gives impetus to Europe-wide networks.

Instead of the focus of transfer being top decision-making elites, it is possible for transfer to be a process involving many organizational levels at the same time.

Another dimension of the "how" variable is the assumption in much of the transfer literature that transfer is a unidirectional activity. It is quite possible for a country to borrow and idea, transform it and reexport it. The Post Office in Britain borrowed back from the Japanese some aspects of a system based on the British model. Seeley (1896) argues that British local government was reshaped in the early 19th century under the influence of the German reforms of Freiherr vom Stein, and the reformed British structures found their way back into German practice at the end of the 19th century. The process does not necessarily have to extend over such a lengthy time period in order for it to become recursive.

b) Issues

Thus far much of the literature has involved *describing* instances of transfer and fitting them in broader topologies of transfer — classifying the types of thing being transferred (an idea or a whole bundle of specific practices), the processes used to draw lessons from other countries (whether "rational shopping" or otherwise). This is not to say that the field has not attracted much jargon. For example DiMaggio and Powell's (1983) article comes up with three types of "institutional isomorphism" (which appears to be largely understood as "convergence") — coercive, mimetic and normative, each of which has relatively commonsense equivalents (coercive involves pressure above all from citizens and clients for change; mimetic from organizations faced with uncertainty looking to others for models of reform and normative from the spread of professional values).

There are broader issues in the literature. Perhaps the most common general question from the "diffusion of innovation" literature is the question of the *preconditions* which foster the transfer of

innovations: what characteristics make people disposed to learn from others? One such precondition is the specific stimulus to change — often characterised as a crisis or uncertainty (DiMaggio and Powell 1983; Teague 1999). Other preconditions might also involve the circumstances generating demand for change along the lines set out by a particular model to be adopted and the support and resistance within the potential recipient organization — the "congruence between the innovation and the social, economic and psychological characteristics of the potential adopter" (Brown 1981). More specifically the "diffusion of innovation" literature as it has developed in public policy studies, usually associated with (statistical) studies of US states (Walker 1969; Gray 1973), has tended to focus on the socio-economic, ideological and geographic proximity of jurisdictions that learn from each other, and the question of whether the process of diffusion is a "point source" (e.g. coming from one source such as the federal government) or a more diffuse "segmented emulation" (Eyestone 1977).

It is not only the characteristics of the importer that might shape who draws lessons from whom, but characteristics of the policy or programme itself. Rose (1993) highlights a number of general hypotheses framed primarily in the context of cross-national lesson-drawing surrounding the "fungibility" of the policies or practices borrowed (i.e. their ability to "travel"), and cross-national borrowing might be related to programme-specific features — including the complexity of the programme, the distinctiveness of the institutions required to run it, the scale of change they bring about, the relationship between the programme and other programmes.

c) Gaps

There is a danger in identifying "gaps" in a literature. Our knowledge of the world around us is riddled with gaps; identifying which gaps are more important than others is highly subjective. A safer way of approaching this task of identifying gaps is to identify those that appear to be revealed by existing studies of policy transfer — given the questions that studies of policy transfer ask, where do the answers they come up with appear the least convincing?

One general assumption in much of the literature is that there is more transfer going on in the contemporary world than before. How one would establish this and whether it matters strikes me as a gap. The historian Otto Hintze (1962) argued that up until the end of the fifteenth century it was possible to look at the political and administrative institutions of European states and territories as *bodenständig* — arising from the constellation of circumstances peculiar to the particular patch of earth in which they develop. After that began, he suggests, a process of more conscious choice and borrowing, one state from the other. Later on, in his *Great Society*, Graham Wallas (1914) suggested the nineteenth century as the turning point between isolated nation states developing their own social, economic, and political trajectories and what we would today call a "globalised" world in which policy innovations as well as cultural developments easily slip across national borders.

Perhaps a more pressing gap in the literature is the question of the significance of the who, what, why, when and how questions discussed above. This, of course, raises the question of significance for whom or what. There are at least two types of answer to this question. One is that the significance may be for our understanding of the way in which policy making works in a particular country (whether this is the importer or exporter jurisdiction). If we understand the purpose of the study of transfer to highlight features of decision making in the country concerned, then such studies can relate to existing characterisations touching on "policy making styles" (see Richardson 1982). Here the size of the gaps depend on whether the country one is interested in has generated much of a literature on general policy making styles (compare Sweden and Germany with Denmark or Austria) and how adequate one judges the policy styles literature to be (whether it is, as one critic put it, "armchair generalization" or systematic comparative concept).

The second answer to the question of the significance of the who, what, why, when and how questions may be for how lessons *should be drawn* cross-nationally. This takes us, I believe, into a substantial gap in the literature; the absence of a discussion of the relationship between the process and the outcome of transfer. This need not necessarily involve producing guidelines for the "one best way" or even the best way under the circumstances to transfer policies. Rather, what one might be looking at here is the question of whether the way in which governments or organizations search for lessons affects the types of lessons that they draw and apply. Let me mention by way of example some specific questions that might arise under this heading. Do policy entrepreneurs rather than collectively organized commissions tend to import lessons which highlight the benefits and downplay the disadvantages of transfer? Are policy makers less likely to subject to critical evaluation lessons drawn from one set of countries (say, common law countries) than others (say, Roman law)? Are voluntarily imported policies applied and adapted with the same degree of zeal or success as those introduced under some conditions of coercion? Do cross-national think tanks tend to develop distinctive types of lessons, say a "one-size-fits-all" approach? Linking outcomes to processes is one possible way of taking things forward which would also be likely to attract a practitioner audience.

III — Lesson Drawing

Rose (1993) suggests that their are four broad stages in the activity of lesson drawing — "searching" for sources of lessons, "making a model" of how the policy or practice works in situ, "creating a lesson" by assessing what can be extracted from the practice in the exporter jurisdiction to produce the desired results in the importer jurisdiction and "prospective evaluation" of the way in which the policy or practice are likely to work in the importer jurisdiction and adaptations needed to make it work. This requires knowledge about the conditions that contribute to the relevant features of the operation of the policies or programmes in the exporter jurisdiction; knowledge of the potential impact of existing conditions in the importer jurisdiction on the relevant features of the operation of the policies or programmes to be imported and knowledge about what can and should be changed to make the programme work satisfactorily in the importer jurisdiction.

a) Variables

This definition suggests that the central variables in the social scientific development lesson drawing are nothing less than those relating to the conditions which affect the way programmes and policies work and might be expected to work. More specifically, the study of lesson drawing is the *comparison* of conditions in importer and exporter jurisdictions and the ways in which differences can be circumvented or compensated for. This suggests at least three sets of variables

i) Objectives

Why a policy was introduced in the first place in the exporter jurisdiction may contribute substantially to the way it operates. For example, the agency structure of Swedish government was not a "new public management" reform introduced to increase efficiency, but originated in a seventeenth century practice to restrict the power of Parliament (Elder and Page 1999). Those who looked to Sweden for models of new public management were thus judging the performance of the system on the basis of criteria substantially different from the objectives on which the structure was originally based. Understanding the differences in objectives between those who framed or shaped the institution in the exporter jurisdiction and those who seek to adopt it in the importer jurisdiction are important since it is quite possible that some specific features of the programme are aimed at pursuing goals which are undesired or irrelevant by the potential importers. Moreover, the acknowledgement of different goals

might in turn lead to advocating more selective forms of borrowing — just as, for example, in the organization of the police, 19th century Japan borrowed predominantly from the French, its training was more heavily influenced by German practice with its perceived greater ability to address problems of political subversion.

Knowledge of the objectives behind a programme or set of practices are especially hard to determine — as we know, goals are vague, contradictory and confused. Moreover, different people, even senior people in the same organization, have different goals, and they may change substantially over time (Gross 1966; Hogwood and Gunn 1985). It makes little sense to try to categorise goals here as sets of continua, in the way in which other variables may be categorised. To be able to categorise goals as, say, "social", "political" or "bureaucratic" says little about their specific content, and knowledge of this content is crucial in determining which parts of policies or programmes one wants to import. The adequacy of statements such as those implying that Japanese police training developed from a pursuit of anti-subversion objectives or that Swedish agencies resulted from a desire to limit the powers of parliament relies on the ability to provide *plausible evidence* linking distinctive features of their design or operation to the pursuit of such objectives. While of necessity hard to define, questions related to the purposes of policies or practices are central to the study of lesson drawing.

ii) Programme or Policy Design Variables

If we are concerned with understanding differences between countries in respect of the existence of conditions that make it possible to transfer a policy or programme, or what needs to be done in order to make it possible, we need to know about the internal design of the policy or programme in the exporter jurisdiction and whether these design features exist, can be replicated, imitated or substituted by other features in the importer jurisdiction. Such features are likely to be highly specific to the programme or set of practices under consideration, but may include variables relating to cross-national differences in

•Institutional structures of authority

Constitutional and institutional structures between nations differ. Perhaps the most important of such variables is the distinction between federal and unitary states (Rose 1993). Federal states cannot borrow without substantial modification models based on unitary states where the strong authority of a central government is crucial to the operation of the model. Even within unitary states there are fundamental differences in structures of authority that affect the scope for borrowing: different levels of decentralization in education systems, even within unitary states, make comprehensive reform more difficulot in some jurisdictions than others (Archer 1979).

•Organizational characteristics

The organizational set responsible for delivering a policy in one jurisdiction may be hard to replicate in another. For example the absence of organizations capable of filling the role of German Chambers of Commerce in education training meant that the influence of German experience in the development of Training and Enterprise Councils in the UK could only be limited, in this respect (Bennett and Krebs 1991). The general prescription that the "private sector" should deliver public services makes assumptions about the character of the private sector (e.g. that it is composed of organizations sufficiently large and professionalised to tender for services) which do not reflect the reality of developing countries.

•Resources

The amount of authority, money and time are key influences on the degree to which, and manner in which, a policy can be transferred from one jurisdiction to another. Training and Enterprise Councils (TECs) had different resources to their nearest equivalents in the US and Europe — budgets, budgetary stability and personnel — which had a powerful effect on their performance.. Some policies rely crucially for their operation on a group of people with specific characteristics; Rose and Wignaneck (1990) look at the conditions under which skills training might be introduced in the United Kingdom following the German model. Here Rose shows the importance of "master workers" as a deliverers of skills training in Germany and highlights the need to establish cadres of such workers in Britain.

•Mix of tools

Governments use different mixes of tools to produce results; as Hood (1983) puts it, they have as Nodality (being at the centre of a network), Authority, Treasure (financial incentives) and Organization (the ability to order its workforce to carry out tasks). Rose groups the tools of government under the headings of "laws, money and advice". The specific mix of incentives, rules and procedures that go to make up policies may be hard to replicate exactly. For example, in evaluating the prospects for American-style HMOs (Health Maintenance Oganizations) in France, Canada and Britain, Rodwin (1989) looks at alternative ways in which these systems might be able to create the same sorts of market incentives in radically different health systems using different mixes of regulation and financial incentives. The choice of incentives may have a fundamental impact on the operation of the policy, as is shown in Titmuss' (1970) analysis of different systems of donating blood in Britain and the US.

iii) Wider societal variables

A whole range of wider political, societal, economic and cultural conditions contribute to the operation of any policy, and their absence in another jurisdiction might mean that the functions these conditions fill have to be filled in a different way in the importer jurisdiction. Since "wider societal variables" refers to all features of the environment within which the policy operates, it is a vast and highly diverse category. It includes cultural attitudes — for example the role of the samurai crucially affected the early development of the French model of policing in Japan (Westney 1987, p. 51); to or the conceptions of women's roles in the family and workplace affect the operation of family policies in Europe (Hantrais 1997). The category also includes traditional practices within the jurisdiction; conditions of collaboration between labour and trade unions affect the functioning of training systems in Britain and Germany (Rose and Wignaneck 1990) and the historical background of public policy development as between different varieties of welfare state shape approaches to income redistribution (Mitchell 1991; Esping-Andersen1990). The interaction with other policies is a further feature of a policy's environment which may have a direct bearing on its operation in a different jurisdiction.

b) issues

The general hypotheses thrown up by this literature focus on the characteristics of societies and programmes that make it possible to transfer from one jurisdiction to another. These issues are well set out by Rose's (1993, pp. 120-141) list of hypotheses relating to the "fungibility" of programmes; programmes may be expected to travel across jurisdictions more easily where they are less context-dependent; where the organizations for service delivery are substitutable; where the resources available to develop the programmes are similar; where the mechanisms by which the programme works (the "cause and effect structure of a programme") are simple; where the scale of change the programme produces are small; where the programme covers areas of interdependence between importer and exporter jurisdictions and where the values of policy makers are relatively consensual.

c) gaps

Perhaps the biggest gap here is the existence of a body of a substantial body of analytical, social scientific work which seeks to draw lessons from the experiences of other jurisdictions. Relatively few of the references in Rose's (1993) discussion of lesson-drawing are actually references to sources which draw specific lessons in particular policy areas — hence he accurately describes his approach as a "novel way of thinking about familiar problems of public policy" (p.xi).

If we remember that the purpose of looking at the literature was to evaluate the best way of widening the market for our research, identifying the small number of specific analytical lessons published highlights a central problem; specific lesson-drawing examples are not generally published in mainstream social science journals. Those cited in Rose's (1993) survey tend to be publications of organizations such as OECD. As many of the projects in the programme seek to conduct prospective evaluations of policy let me raise the question of the strategy of getting the results spread to a wider audience and offer three possible answers. One is to submit articles or books devoted to drawing specific lessons to mainstream journals and publishers. The second is to split the results of the research into two components — a component that addresses mainstream comparative public policy issues by analysing and comparing the operation of public policies in different jurisdictions, and a component that explicitly draws lessons. The comparative public policy can be published by the mainstream journals and publishers, the lesson drawing can be published in more specialised journals and the publications of groups and organizations. The third is to introduce a section or chapter on lesson drawing into a journal or book publication that is otherwise concerned with mainstream comparative policy issues.

IV — Conclusions

The stimulus for this meeting, if I read things correctly, was that there was a widespread feeling that there was a body of literature that people ought to know more about in order to conduct their own specific research. My own view is that despite the jargon of some of the approaches to the study of policy transfer, it is generally fairly unsophisticated. This is not intended as a criticism; merely to say that descriptions of who, what, how, where and why policies were transferred do not generally require a previous intellectual investment in a set of complex concepts or a voluminous theoretical literature, but can be explained and grasped using commonsense terms and categories. For the project exploring how policies travelled from one jurisdiction to another there are plenty of theoretical issues that remain to be explored and important gaps in our understanding about how transfer works. But in my view this is exactly what the proposals covering transfer said they would do in the research. This implies that the transfer literature might be approached more as a means of identifying themes in the wider literature that the project addresses rather than expecting the literature to provide firm guidance about how to frame the research questions or how to pursue them empirically.

The lesson-drawing perspective is a relatively open field. It requires knowledge of how policies work and knowledge of the wider social, political, economic and cultural conditions that affect how they work in the exporter jurisdiction and how they are likely to work in the importer jurisdiction. These are exactly the sorts of knowledge required to conduct good comparative pubic policy research of the sort that has been published for many years. A lesson-drawing perspective adds value to comparative public policy research — it answers directly the question of the relevance of such research without compromising in any way its intellectual ambitions of explaining and contributing to theoretical developments in comparative politics and government. The requirements for adding a lesson-drawing dimension to a comparative policy study are extremely exacting, but like the policy transfer literature, do

not require a large investment in a voluminous or technical literature on the subject. Rigour in this context means logical and systematic research rather than long words or an appeal to complex social theory.

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