Policy Transfer: Something Old, Something New, Something Borrowed, But Why Red, White And Blue?

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POLICY transfer is an increasingly important feature of the contemporary policy-making process. In large part, this is because the growth of legislation and the pace of change is greater than ever before. Faced with such pressures, governments have looked to other countries as a source of policy ideas, institutional reform and even detailed legislation. Rose terms this process lesson drawing.1 We prefer the term policy transfer because it is not all voluntary, while lesson drawing implies the ‘borrowing’ country has a choice.2 However, we are not concerned only with the transfer of policy programmes; in our view, ideological rhetoric, policy ideas, institutional structures, administrative arrangements and, as we shall see below, electoral strategies may also be transferred.

As far as the UK is concerned, most transfer is voluntary and thus can be characterised as lesson drawing, although EU treaty obligations mean that the UK in certain fields is bound by European directives. Here however, we are concerned with voluntary transfer and, indeed, with one particular feature of contemporary lesson drawing by British governments, the propensity with which they ‘borrow’ from the United States.

Of course, it is not possible to quantify the extent this transfer. Governments do not provide convenient lists of what they borrow, or from where they borrow. There are also difficulties in establishing whether transfer has occurred. We cannot merely assume that because the UK introduces a policy similar to one in the US, or the Labour Party adopts an electoral strategy closely resembling one used by the Democrats, that this necessarily involves policy transfer. We have to establish that UK policy makers/the Labour Party were searching for a policy, that ministers/party leaders/policy advisors/civil servants visited the US to examine a policy/electoral strategy, and that key elements of this were incorporated into UK practice and/or legislation. Here we can only deal with two cases: first, the exchange of ideas between the Labour Party and the Democrats about electoral strategy, each learning from the other at different times; second, the case of social, particularly, welfare/labour market, policy, a broad area in which the UK has drawn lessons from the US. These are examples of a wider trend and readers will be able to point to other examples based on their own experience.

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Electoral strategy

In 1986 a Democratic Party consultant, Joe Napolitan, came to help Neil Kinnock in the run up to the 1987 election. However, Kinnock was ambivalent about his role, so it was not crucial. Subsequently, before the 1992 presidential election, the Democrats turned to the Labour Party for advice about the lessons, both positive and negative, which could be learnt from its unsuccessful 1992 election campaign. Most significantly however, the Labour Party borrowed electoral strategy from the Democrats in the build up to the 1997 election. Our aim here is to establish which lessons the two parties drew and how they drew them. In addition, we shall argue that the lesson drawing involved was in fact broader because the goal of winning elections drove the Labour Party to adopt new policies, as well as new electoral strategies, from the Democrats.

By 1992 the Democratic Party had failed to win the presidency in three consecutive elections. The Republican Party (like the Conservatives under Mrs Thatcher) had attempted to move, and indeed partly succeeded in moving, the political centre further to the right; in particular, the market was seen as the basis of economic growth and controlling inflation as more important than reducing unemployment. Clinton’s political advisers in 1992 believed that the Democrats had to adapt both their electoral strategy and their policies if they were to win. They turned to the Labour Party. Dave Hill, its Head of Communications during the 1992 election, was seconded to the Clinton team in 1992. His role was to advise on what Labour had done right and wrong in the 1992 campaign. He took with him a number of associates, including Peter Mandleson. In addition, Phillip Gould, who played a key role later in the iterative process, spent four weeks in the Clinton headquarters in Little Rock advising on tactics, particularly in the last week of the campaign, a period during which it was widely believed the Labour Party lost the 1992 election.

One cannot be precise about the influence of Gould, Hill and other Labour aides on the strategy. At the very least, they reinforced changing Democratic thinking. They stressed the need of a professional campaign and particularly the dangers of overconfidence. The Democrats pursued a strategy which emphasised modern marketing and advertising techniques and used information technology to its utmost. They also used consultants with specialised knowledge of political advertising, techniques such as telephone surveying and stratified public opinion polling. In addition, sophisticated focus group technology became the core of the campaign strategy. These techniques enabled resources to be targeted to capture the key swing voters: middle-class independents, often living in the suburbs, who in the past might have leaned towards the Democratic Party but had swung to the Republicans in the 1980s. It was assumed that party loyalists would remain faithful, if only because
they had nowhere else to go. The goal was thus to focus not on the majority of voters who identify with a particular party, or who had made up their minds early in the campaign, but on the minority who were undecided. The Democrats also used spin doctors to attempt to gain some control over media coverage of political events, unemployment rates, the rate of inflation, etc. because, in their view, the media shaped public reaction to such matters. On the basis of focus group sessions, moreover, themes, issues, policies and even the personality of the candidate were packaged in a way which appealed to target groups.

Of course, this electoral strategy had policy consequences, particularly once Clinton was elected in 1992. It was claimed that swing voters were to be found in the political centre. Clinton thus entered the White House as a ‘New Democrat’; that is a Democrat who wished to distance himself and his party from ‘tax and spend’ policies. The New Democrats were also tough on crime and welfare because these were seen as key issues in establishing a base among middle-class voters. It was said that such voters needed reassurance that welfare expenditure would not lead to higher taxation. Welfare rights must therefore involve responsibilities and workfare was as a solution to welfare dependency. This position was perhaps not surprising considering Clinton, as chairman of the National Governors’ Association, had supported the passage of the Reagan Family Support Act in 1988.4

The Clinton victory led many of the modernisers in the Labour Party to conclude that they could learn important lessons about how a left-of-centre of party could win in a political context in which the right was seemingly dominant. Moreover, and perhaps more important, the adoption of new electoral strategies would not only demand but also legitimise policy changes that would have otherwise been impossible to achieve. The left was told policies needed to shift towards a neo-liberal position because the new electoral strategy demanded such a shift. The process of transfer thus entered into a new stage as the Labour Party drew lessons from the Democrats. A number of party activists and media commentators emphasised that Labour could learn important lessons from Clinton’s victory.5 This was not a universally popular message Clare Short and John Prescott opposed any move to embrace Democrat strategy, let alone Democrat policies.6 However, Patricia Hewitt, who had previously been a senior adviser to Neil Kinnock, and Philip Gould, who advised the Labour Party on polling, were asked to produce an assessment of the Clinton campaign and what the party could learn from it. Both were Labour modernisers and concerned that it should draw lessons about electoral strategy. The implication of their report was that to win, Labour needed to mimic the Democrat campaign.7 They emphasised that, bearing in mind US experience, Labour should: repackage the party’s identity; reform its structure; use focus groups to identify key themes; adopt an open and accessible form of campaigning, identifying the leader as an ordinary individual; run a
carefully managed campaign; establish a coordinated ‘war room’; respond quickly to opposition attacks by using a databank of quotes and information. Another internal Labour Party report, after an analysis of the Clinton campaign, recommended that telephone banks should be used to canvass voters.8

Not all of the recommendations of the Hewitt-Gould Report were novel. Some built upon the work of the Shadow Communications Agency, which Gould had been influential in establishing in 1985 and which had guided Labour’s polling and electoral strategy between 1986 and 1992. However, it was clearly influential and its effect was underpinned by the increasingly close contacts between the two parties’ leaderships. Blair and Gordon Brown first went to Washington in January 1993 and both returned over the next few years. Blair’s first visit as Leader of the Opposition in April 1996 was particularly significant. He met Clinton and other senior members in the Administration. The meeting with Clinton proved to be the beginning of a fairly close personal relationship between the two, furthered when first Clinton visited Blair and addressed the Cabinet in May 1997, soon after Labour’s election victory, and Blair’s subsequent Washington visit in February 1998.

Given all this interest, it is not surprising that Labour’s campaign was run in accordance with lessons learned from Clinton and the New Democrats. Indeed, Stanley Greenberg, who served as Clinton’s pollster in his 1992 campaign, was brought in to help. The campaign, as Labour’s positioning after Blair became leader, closely followed the recommendations of the Hewitt-Gould report. The Labour Party was rebranded, a much-trumpeted break with the past reflected in an attempt to rename it as New Labour in the eyes of the electorate. It was restructured, with the move towards one-member-one-vote and a significant weakening of the links with the trade unions. It used focus groups, stratified opinion polling, telephone canvassing and spin doctors to great effect. It adapted advertising and campaign rhetoric to appeal to electorally important groups to which it formerly had little appeal. It placed particular emphasis on Blair, who was presented as very different from traditional Labour leaders, a strong leader who understood and would protect middle-class interests and sensibilities. It established a war room and a computerised database, Excalibur, which allowed immediate response to media or Conservative challenges.

**Social policy**

As noted, key changes in the policies of the Democrats were closely related to their electoral strategy and this was also the case with New Labour. We now turn briefly to welfare to work policy, where Labour’s borrowing from the US was clearly influenced by its view that policies which focused on ‘hand-ups, rather than hand-outs’ would play better with the middle-class voters it was trying to attract. Similarly, just
before the 1997 election the Labour Party committed itself to keeping to Conservative spending plans. This was intended to distance ‘New Labour’ from the image of ‘Old Labour’ as a tax-and-spend party, crucially important to capture middle-class votes; it also had great resonance with the strategy of the Democrats. In this case, then, we have policy learning/lesson drawing in both directions. From the UK perspective, Labour became more interested in electoral strategy after its 1987 defeat and almost obsessed with it after its unexpected (to the party) defeat in 1992. So, the stage was set for lesson drawing. However, it was the experience of Labour advisers in Clinton’s successful 1992 campaign which confirmed its view of the need for a much more professional approach. From the US perspective, the Democrats were interested to learn from Labour’s successes and failures in 1992 and were happy to offer advice in 1997. It would be surprising if the Democrat candidate in 2000 does not draw on the experience of Labour’s 1997 campaign.

During the Thatcher years, the government turned to America for ideas and inspirations in many areas of social policy, particularly those associated with welfare reform. Throughout the 1980s American politicians and academics were discussing the emergence of dependency. The argument was that the growth of a dependency culture significantly undermined the work ethic. The Thatcher government was quick to adopt this rhetoric. By 1990, when Major became Prime Minister, the unemployed were portrayed as responsible for their situation. The Labour Party became interested in the Democrats’ welfare policy in the early 1990s. On his return from helping the Democrats’ election campaign, Philip Gould advised Blair to copy their policy stance and tough rhetoric. In addition, Tony Blair visited Washington on a regular basis in 1993, while members of the Clinton Administration, including its Secretary of State of Labor, began visiting London to offer Labour advice on American policies. Perhaps most important, Gordon Brown, one of the driving forces behind the party’s welfare reform programme, and his key adviser Ed Balls, educated in the United States, were frequent visitors to Washington between 1993 and 1997. Since Labour’s election in 1997 these links have strengthened and have been reflected in lesson drawing. For example, the government’s justification of the New Deals for 18 to 24 year olds, the long-term unemployed, lone parents and the disabled, rested on the argument that welfare led to a dependency culture in which its recipients were cut off from mainstream society. In a way very reminiscent of the Democrats, the government has emphasised its aim to reintegrate such groups into the active labour market.

Ideas borrowed from the US helped transform public attitudes towards the unemployed and economically inactive, but policies, programmes and institutions were also transferred. Perhaps the clearest example occurred during the Thatcher administration. The government
was so impressed with the success of the US Job Clubs that it copied them into the British welfare-to-work system—Kenneth Clark, then Chancellor of the Exchequer, admitting that they were based on American experience. There are numerous other examples: institutions like the Training and Enterprise Councils and the Child Support Agency; programmes like the Employment and Training Programme and various elements of the Restart Programme; policies such as workfare for 16–17 year olds and the ‘actively seeking work’ rules for the long-term unemployed. Under the Major government, transfer continued. Programmes such as the Job Seekers Allowance and Project Work were directly inspired by American programmes.

One might have thought that this pattern of transfer from the US would change with a Labour government but that was not the case. The New Deals for 18 to 24 year olds and the long-term unemployed were based on US welfare-to-work programmes, particularly the Wisconsin W-2 Programme and the Federal 1996 Personal Responsibility and Work Opportunity Act. Similarly, the New Deals for Lone Parents and the Disabled were based upon the government’s understanding of the California GAIN and Wisconsin Works Programmes, as well as the Australian JET Programme. The chief administrator of Wisconsin’s W-2 was influential in the policies promoted by Frank Field as Minister of State for welfare reform.

While it is probably in the area of welfare-to-work policy that transfer has been most evident, it has also occurred in other areas of social policy. For example, market-oriented health polices were exported across the Atlantic. What was transferred here, however, was a set of ideas, not institutions, programmes or policies. Ideas about competition and other market-type innovations (e.g. internal markets in the NHS) which the Thatcher and Major governments implemented were actively promoted by American health economists (notably Alain Enthoven) but there was no blueprint to import.

During the 1980s and 1990s there was also transfer between the US and the UK in penal policy. One of the most striking examples involves the decision of both Major and the Blair governments to introduce electronic monitoring of offenders based upon the US model. The Blair government also borrowed American tactics for dealing with drug traffickers and drug users. It established in Yorkshire an American-style drug court in which individuals arrested in connection with drug use will be dealt with at the court and sentenced to treatment. It copied American tactics towards organised crime by a shift in the burden of proof regarding the assets of criminals—they rather than the prosecution must show they are not the proceeds of crime.

One brief example will illustrate the type of processes involved. The Labour government came to power with a Manifesto commitment ‘to examine the interaction between the tax and benefit system so that they can be streamlined and modernised, so as to fulfil our objectives of
promoting work incentives reducing poverty and welfare dependency and strengthening community and family life’. The Chancellor of the Exchequer appointed Martin Taylor, Chief Executive of Barclays Bank, as head of a task force to look at options for reform. Taylor explains that ‘Gordon Brown asked me to look at what lessons could be learned from the Earned Income Tax Credit, the US payable tax credit that provides financial support for low-paid working people’. He examined the system and visited the US with members of the task force, concluding: ‘The US EITC had much to recommend it. Although the differences between the UK and US tax and benefit systems need to be recognised, there is no overriding reason why the UK should not have a tax credit system payable through the pay packet to families in work.’

He recommended a tax credit system for working families based upon the EITC but taking account of the differences. This was a fairly typical case of transfer from the US. The government identified a problem, the US experience offered a putative ‘solution’ and was thus investigated. In some cases, a policy/institutional structure is virtually copied, in other cases the US is seen as an inappropriate model. However, in most cases, like this one, lessons are drawn from the US but adaptations are made to take account of the different circumstance, culture and institutional settings.

Of course, the UK government did not only draw lessons from the US. Australia and New Zealand were key sources of lessons and even Europe was occasional used. Nor were all US lessons positive. The development of UK policy on executive mayors offers a case in point. The minister responsible for the legislation, Nick Rainsford, with a group of civil servants and policy advisors, visited a number of US cities, including New York, Washington, Detroit and Chicago, to examine the powers of their executive mayors and their relations with the elected councils. They concluded that these models were inappropriate and turned instead to Europe, using Barcelona as their main model; and it is lessons from Barcelona which appear to have had most affect on the final legislation. Another example is the Common’s Social Security Select Committee visit to a number of US states in 1997. It said: ‘Despite differences in society and welfare systems, the American reforms raised a number of themes and issues that need to be addressed as the Government embarks on welfare reform in the United Kingdom. We believe that the British social security system should be more closely tailored to work requirements for claimants. However, we would not wish to see anything approaching Wisconsin’s requirements for lone parents with young babies to work, any requirement involving under school age children seems counter-productive and possibly harmful to families.’

Why America? What facilitates transfer either way?

Why is transfer between the United States and the UK so common, and why it is normally from the US to the UK? We begin with factors which
facilitate lesson drawing between the US and the UK. First, there is the common language. The point is obvious but should not be neglected. International policy transfer involves politicians and bureaucrats in visiting other countries and talking to their counterparts. It also means they have to read policy documents, legislation, reports, etc. published there. Although some politicians and bureaucrats are multi-lingual, there is a strong incentive to look to English-speaking countries for lessons. This removes all problems of translation and enables a much easier exchange of ideas. This is shown by the fact that the two other countries which Britain has most frequently borrowed from in the past are Australia and New Zealand. The Labour Party’s New Deals for Lone Parents and the Disabled were in part based on the Australian JET Programme. Similarly, the 1991 Child Support Act, which set up the UK Child Support Agency, drew upon the Australian, as well as the US, experience. British public management reforms in the 1980s owed a great deal to lesson drawing from New Zealand.

Then there is a shared ideology. This partly explains why transfer from the US to the UK increased in the 1980s, as both embraced ideas which underpinned many policy reforms. It is often said that in Britain there was a postwar consensus based upon Keynesian economics and social democratic politics, with state involvement, particularly on the demand side of the economy, and high levels of public spending, particularly on welfare. Thatcherism marked a break with this past, a move towards neo-liberal or New Right policies to free the economy so that market forces can operate more effectively. This involved curtailing the power of the trade unions, which acted as a constraint on the operation of the market, and reducing welfare spending. It is also generally agreed that in the 1980s there was a convergence between the economic policies of the Reagan and Thatcher governments around a New Right agenda. From the early 1980s, the US and the UK shared a common ideological position. This neo-liberalism has persisted, although not exactly in the same form, since the election of Labour. New Labour is committed to market solutions, controlling public expenditure and keeping down inflation. It is more concerned with keeping business on board than to resurrect links with the trade unions. This policy is seen by New Labour as inevitable because economic globalisation means that capital is flexible: to attract foreign investment, the government needs to provide an economic, social and political infrastructure attractive to business. It is also electorally beneficial, in the view of many psephologists as well the Labour Party, because such policies are attractive to the key groups of middle-class supporters which Labour has to attract.

This shared ideology provides the underpinning of much of the policy transfer from the US to the UK. Working within the neo-liberal paradigm, the Reagan and Clinton administrations and those of Thatcher, Major and Blair had, and have, a similar perception of policy problems.
Both, for example saw the labour market problem as one in which it was crucial to encourage, cajole, and even coerce, people on welfare back into work, or, in ‘Blair-speak’, to replace hand-outs with hand-ups. It is hardly surprising that the UK looked to the US for lessons because the latter had started on this road earlier, so provided models. Indeed, different US states had experimented with different programmes, all of which fitted comfortably with the prevailing ideology, so a variety of models existed. Moreover, there were American policy entrepreneurs and think-tanks promoting US solutions to British policy-makers.

Of course, this shared ideology does not mean that there is transfer between the US and the UK in all areas of economic, labour market and welfare policy. The two countries experience of neo-liberalism is not homogenous. Its effect is mediated by the countries’ political, social and cultural structures. None of the three most important features of Thatcherite neo-liberalism, the adoption of monetary targeting, privatisation and trade union reform, involved transfer from the US. The first occurred in Britain with the Medium Term Financial Strategy in 1980, while the US Federal Reserve did not adopt this policy until 1982–83; as far as the second and third were concerned, there was little, if anything, which could be learned from the US because the structures of public ownership and industrial relations were quite different in the two countries.

Personal relations also clearly play a role, although in most cases less important. There is no doubt that the relationships between Reagan and Thatcher, then Clinton and Blair, facilitated transfer. Clinton and Blair have met on a number of occasions (summits apart) and these meetings have included opportunities for less formal contacts, often involving their wives. They have discussed many policy ideas, with a focus on the ‘third way’—the development of a policy emphasising markets but recognising that the state must be involved in ways which encourage rather than suppress market forces. A meeting at Chequers in December 1997 focused on the way forward for the centre-left, followed, in Washington in February 1998, by a conference, to which Blair took his aides and a number of sympathetic intellectuals, which discussed the ‘third way’. The latter proposed the establishment of a standing conference of centre-left parties which would include European social democratic parties but would be led by the Democrat/Labour axis. As one book says: ‘In his articulation of the “third way”, Blair has regularly emphasised that European economies must learn from the achievement of the United States, especially the flexibility of its labour markets.’ Of course, other personal relations have also been important. In Philip Gould’s crucial role in Labour’s changing electoral strategy, for example, he was clearly influenced by his experiences in the Clinton campaign of 1992 and the contacts he made during his time in America.
Think-tanks and policy entrepreneurs also played a key role. The Institute of Economic Affairs (IEA), the Centre for Policy Studies and the Adam Smith Institute wielded significant influence during the Thatcher and Major era. Demos and the Institute of Public Policy Research (IPPR) are similarly influencing the Blair government. They were also involved in policy transfer. For example, both Demos and the IPPR have sponsored seminars on social reform attended by ‘influentials’ such as Frank Field, Anthony Giddens and indeed Tony Blair, who addressed the IPPR on welfare reform at its tenth anniversary conference. Interestingly, one of the key proponents of the adoption of American social policies, Matthew Taylor, is currently the Director of the IPPR and was formerly Head of Research for the Labour Party. One of the key reasons why think-tanks play a major role is that the UK think-tanks have close links with their American counterparts. There were continual contacts between e.g. the IEA and the American Heritage Institute during the Conservative years and at present there are close contacts between the IPPR and both the American Public Policy Institute and the Democratic Leadership Council.

Policy entrepreneurs are also important. The American economist Alain Enthoven was influential as a source of ideas (notably internal markets) in relation to health policy. His role however was more as a source of ideas rather than a policy entrepreneur. In contrast, during the 1980s Cay Stratton was one of the key Americans advising the British government on welfare reform, spreading ideas about US practice. Drawing on her experience as the Director of the Boston Private Industry Council, she helped establish both the Employment and Training Programme and the Training and Enterprise Councils; she has also been an advisor to the Blair government on its welfare-to-work programme.

Why America? Why is transfer mainly one-way?

One simple explanation is chronological. Given that much of the transfer between the US and the UK was underpinned by a commitment to neo-liberalism and given that the US embraced this position and adopted policies consistent with it earlier, many US policy models were available in the 1980s when the UK moved in that direction. However, there are two other, related, elements. First, the US is a reluctant borrower from anywhere. This is partly because of its self-image as a country which sets the agenda for other democracies and partly because its federal structure means that there can be, and is, significant lesson drawing between states. Second, Britain draws from the US partly because the federal structure means it offers a variety of models and partly because, since the 1980s in particular, it has seen its world role as a strong friend and supporter of the US.

An article on US influence on Canadian environmental legislation is entitled ‘Sleeping with the Elephant’, evoking a relationship in which
a large superpower can strongly influence its smaller neighbour. However, this argument could be extended more broadly. America's global hegemony, which developed after the second world war, has grown since the end of the Cold War and it can be argued that the US enjoys a 'unipolar moment'. This also helps explain why Britain has drawn lessons from the US rather than elsewhere. If the UK wants an international presence, it cannot stand alone; it either has to become a key actor in developing a European foreign policy or link its policy to the US. Such ties are relevant to areas other than foreign policy and defence. The UK has embraced neo-liberalism and with it a tacit acknowledgement of US economic hegemony, and this has much broader resonance. If neo-liberalism is the message, the US is inevitably the model in the economic, labour market and welfare field.

As noted, federalism makes it less likely that the US will draw lessons from abroad and more likely that the UK will use it as a model. This point can be illustrated by the labour market policy example. The 1996 Personal Responsibility and Work Opportunity Reconciliation Act exemplifies the use of information and programmes between the local, state and federal level within the US. It fundamentally altered the US welfare system by replacing the 60 year old Aid to Families with Dependent Children Programme by the Temporary Assistance to Needy Families programme (TANF) which requires work in exchange for time-limited assistance. The law was the culmination of over four years of reform efforts during which the administration granted 43 states and over 60 local governments waivers in their application of Federal welfare programmes, allowing a good deal of experimentation. The experience thus gained allowed Congress and the President to draft the compromise law. The UK government has drawn on various state models. Throughout the 1980s and 1990s politicians, civil servants and policy advisors visited the US looking at labour market policy. During the Thatcher years, Boston was the main source, and here the role of Cay Stratton discussed earlier was important. During the Major government and into the Blair years, Wisconsin and New York became the models.

Conclusion

In our view policy transfer is a key feature of contemporary policymaking and it is likely to become more common in the future. The reason is simple. Faced with an increasingly complex and quickly changing policy environment, governments look for ready-made policy solutions; to put it another way, there is considerable pressure to look for a 'quick fix'. This makes it important to understand the process much better than we have done so far. This brief account is an attempt to understand this phenomenon. We feel we have made a strong case that the US is a key source of lessons for the UK (and readers will have other examples of such transfer). We have identified a number of reasons why the US is such an important model, though one cannot
assess quantitatively their relative importance. However, our argument is that two factors particularly facilitate transfer between the US and the UK in either direction: the shared language and the shared contemporary commitment to neo-liberalism (this is more important in some policy areas than others). In our view, there are two reasons why most of the transfers are US to UK however. The US’s role in world affairs, which gives it a sense of superiority making it unlikely to acknowledge that another political system can offer policy models, while the UK sees its models as appropriate in the economic and labour market fields because they are underpinned by the neo-liberal ideology associated with US hegemony.


2 For differentiation between lesson drawing, obligated transfer and coercive transfer, see D. Dolowitz and D. Marsh, ‘Learning from Abroad: The Role of Policy Transfer in Contemporary Policy-Making’, *Governance* (forthcoming).


9 D. Dolowitz, *Learning from America*, op. cit.


12 M Taylor, *The Modernisation of Britain’s Tax and Benefit System*.

13 King and Wickham-Jones, ‘From Clinton to Blair’, p. 69.