



**3<sup>rd</sup> International Conference  
on Public Policy (ICPP3)  
June 28-30, 2017 – Singapore**

**Panel T06P02 - Session 1 Firms and Institutions as Policy Targets**  
*Title of the panel Policy Implementation - The Role of Policy Targets*

**Title of the paper**

*Policy targets' compliance with voluntary agreements: a different  
story?*

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**Date of presentation**

*Thursday, June 29<sup>th</sup> 08:15 to 10:15 (Block B 5 - 1)*

**Abstract:**

There always has been an interest in exploring compliance and implementation of international treaties and laws, from either the perspective of the involved actors, the process itself and its analysis, trends in development, or the issues the key stakeholders are dealing with. However, not until recently the topic of examining the implementation of voluntary policy agreements has started to be a topic of discussion. Enhancing policies that act in ways that are consistent with the goals and objectives intended by the policy makers in international voluntary agreements, represents a starting point for the members of that agreement to express their commitment.

Policy implementation scholars have offered several explanations for why and how a policy is implemented by putting as main variables the salience of the policy, its design and governance system, but also the arrangements and resources needed for operating that policy, including the will of the responsible bodies. Currently, there is no generally agreed theory of implementation but a collection of multi-factors influencing implementation.

By using the case of higher education policy in the European Higher Education Area and the policy implementation literature, this paper aims to shed light on the role of policy targets (university leaders, administrators, teachers and students alike) in policy implementation. First, it provides a conceptual clarification with regards to policy compliance and policy implementation. A framework which allows to dissect implementation in different stages (adoption, transposition, administrative and institutional implementation), and therefore, distinguish between different types and groups of policy targets, will be the base for conceptualizing and measuring different levels of compliance. In a second stage, by using the Romanian case and secondary literature, this paper aims to support the proposed framework and to show how these levels are reflected at the national and institutional/university level. Last, the paper reflects upon the role of policy targets and their sources and usages of discretionary power, and extent to which the interaction between the lowest rank participants and the users transform not only the professional practices but also the public policies themselves.

**Keywords:** policy targets, street-level bureaucrats, higher education, implementation, compliance

## **Introduction**

Under conditions of hierarchical modes of governance in Europe, with complex and centralized steering mechanisms, and a series of issues with regards to efficiency, effectiveness and legitimacy new modes of governance emerged. Their main rationale was to safeguard some of the policy areas in the hands of national governments or other such units, and to emulate the approach of existing successful organizations by promoting greater diffusion and learning across participating actors.

The open method of coordination (OMC) is one of the new modes of governance which assumes that policy coordination can be achieved through soft law. Soft law is defined as rules of conduct which have no legally binding force, non-binding regulation do not force or compel concerned parties, it is simply used as reference point, there is no punishment, no penalty for breaking this regulation. Hence, the OMC is a method which has been developed “to avoid the classical form of legislation through directives and regulations” (Heritier, 2002, p. 186) Based on the intergovernmental and voluntary cooperation of its members, the OMC implies a high level of political participation (especially in the formulation and monitoring phases) and entails a policy orientation towards a common goal through learning and consensus making incentives (Borras and Jacobsson, 2004). According to Gornitzka (2006) there are four main stages of the OMC. Besides identifying and defining common goals and objectives (1) and translating them into national and regional policies (2), OMC includes the establishment of indicators and benchmarks for assessing the progress towards the agreed goals (3) followed by periodic monitoring, evaluation and peer review as mutual learning processes (4). What is also specific to the OMC is the fact that it is multi-level, that is policy making responsibility is shared among different levels: European, national and subnational (regional, institutional), and involves other actors than state actors. Multi-level governance assumes that no single actor has complete competence in a policy area, most of the times multiple levels of government have overlapping competencies in that field. Hooghe and Marks (2003) distinguish between two types of multi-

level governance. A first type which is composed of a limited number of jurisdictions/ levels (international, national, regional, meso and local) which have a general purpose, that is multiple responsibilities, multiple services or functions. In terms of membership these durable jurisdictions do not intersect but rather nested (e.g. the European Union). In the second type, the number of jurisdictions is vast and operate at different territorial scales, focusing on single issues however with a flexible design (e.g. The European Higher Education Area).

In an attempt to identify different categories of modes of governance, Treib, Bähr and Falkner (2007) propose a typology based on two main characteristics: the extent to which the legal instrument is binding (coercion, framework regulation) or not (targeting, voluntarism), and whether the mode of governance involves a rigid (coercion, targeting) or a flexible approach to implementation (framework regulation, voluntarism). The OMC falls under the category of voluntarism as categorized by Treib, Bähr and Falkner (2007). As follows, voluntarism is therefore the complete opposite of the traditional mode of governance with rigid laws and hierarchical structures. Voluntarism reflects a joint bottom-up initiative through which the parts involved (countries) could deal with common issues which otherwise cannot be dealt alone at the national level. It is based on non-binding instruments (declaratory instruments) and outlines general goals and objectives that the parts involved may define how to achieve them through different policy options. According to Treib, Bähr and Falkner (2007) voluntarism, unlike coercion or targeting where implementation has to be achieved in a uniform fashion, provides a flexible approach to implementation. This means that participating countries have a considerable room for manoeuvre or discretion with regards to the incorporation and application of these commonly agreed provisions.

There always has been an interest in exploring compliance and implementation of international treaties and laws, from either the perspective of the involved actors, the process itself and its mechanisms or analysis, trends in development, or the issues the key stakeholders

are dealing with. However, not until recently the topic of examining the implementation of voluntary policy agreements has started to be a topic of discussion (Elson, 2006; Zeitlin and Heidenreich, 2002; Veiga and Amaral, 2006; La Porte, 2002; Alexiadou, Fink-Hafner and Lange, 2010). Enhancing policies that act in ways that are consistent with the goals and objectives intended by the policy makers in international voluntary agreements, represents a starting point for the members of that agreement to express their commitment and coordinate their policies. By using the case of voluntary policy agreements this paper aims to shed light on how implementation can be better conceptualized and operationalized by looking at different levels, stages and actors involved.

In multi-level systems of governance, as in the case of most international treaties and agreements, policy implementation is most of the times de-centralized, with national, regional and local levels reflecting the broad category of implementation layers. As such, once adopted at the supranational level policies are adapted, implemented, and enforced by actors at lower levels (Toshkov, 2012). The discussion becomes more complicated when one adds the different stages of implementation (e.g. formulation, adoption, implementation, evaluation, maintenance). As I will show below, combining stages and levels in an integrated framework can provide valuable insights into the issues of compliance and implementation, considering that each implementation stage encompasses a series of policy targets (university leaders, administrators, teachers and students alike) which become crucial factors for a successful policy.

Although some studies distinguish between different stages of the implementation process in multi-level settings and different actors, there is no comprehensive framework for analyzing and operationalizing different implementation stages and the behavior of the involved actors. While the public policy literature makes a rather weak distinction between

implementation and compliance, other fields use the terms interchangeably, creating therefore a false impression and different expectations from the readership.

### **Compliance and Implementation: A Complicated Relationship?**

Even though compliance and implementation are used interchangeably many times, the two concepts convey distinct meanings (Treib, 2014). One of the sources for such confusions refers to the factors which affect both implementation and compliance. For example, it is claimed that a policy's objective can be achieved only if the target of that policy complies with those objectives, accordingly, changing the behavior of the target is the whole point of a policy (Weaver, 2014). Weaver (2009) identifies several factors which can explain compliance, among which: sufficient incentives and sanctions, effective monitoring, adequate resources, full information about the policy, its intended goals, and targets' trust in the program or policy at hand. Scholars familiar with the implementation literature can easily observe that the same factors can be found in implementation theories.

Compliance as a term is most often used in the legal scholarship. Questions of why and when states comply with international law or agreements represents one of the central aspects in the field. One of the most striking differences between implementation and compliance stands in the fact that studies which claim that are focusing on implementation are rather focusing on compliance (e.g. Mbaye, 2001). The proof is that these types of studies operationalize compliance in terms of infringement proceedings, which are tools that start in case the target does not apply certain rules correctly. In the same fashion, Treib (2014) contends that studies which focus on the temporal reaction of the target with the rule/policy cannot be categorized as compliance studies.

More recently in Europe, besides the legal sphere use, in policy studies the term has been used in the implementation literature with most of the studies focusing on compliance with competition rules, EU law in Central Eastern Europe (Toshkov, 2012), EU social policy

(Falkner et al. 2005) or EU governance outputs in general (Treib, 2014). Falkner's et al. (2005) book for example, intends to offer an in-depth and comparative study on the domestic implementation of EU social policy and measure its impact at the member states level, in other words, to explore empirically the process and effect of "neo-voluntarism" or "soft" EU social policy. It starts from the idea that social policy-making in the EU is a complex process, due mainly to the multi-state polity of the EU, where member states have different policy legacies and preferences, and therefore the regulatory methods have shifted towards more flexibility and compulsory minimum standards, including non-binding recommendations and other soft law instruments. From the very beginning the authors are focusing more on conceptualizing non-compliance rather than compliance. It is not clear how compliance is conceptualized: is it adherence from the member states' side to the EU, or is it the extent to which the goals of a policy have been achieved. This is just an example, especially from the EU context, where compliance as term is used to refer to implementation, that is mainly transposition and adoption of laws, rather than aligned behavior with an objective or change on the ground.

As far as compliance is concerned, Weaver (2009) defines it as behavior which is consistent with the objectives of the policy, that is in the way that program designers intended and wanted. Compliance therefore, denotes the conformity of behavior with a prescribed rule (Batory, 2016, p. 688) or policy targets' reactions to regulation (Feldman, 2011). It assumes therefore that there is some agency in place, it is more actor than factor oriented. The other side of compliance relates more to the outcome of an intended policy/rule/objective/law/directive rather than the behavior/reaction of the actors involved. From this perspective compliance is concerned with change on the ground, with one of the most common aims of a policy, that is to get people (end beneficiaries) do things they otherwise would not have done, in short with behavior (Weaver, 2009).

The literature identifies several types of compliance. Haigh (1992) differentiates between formal compliance (the legal process of transposition) and practical compliance (the extent to which the goals have been achieved). In other studies, there is a lot of talk about decoupling, creative and symbolic compliance (e.g. Batory, 2016). The basic idea is that these types occur when a target “pretends to align its behaviour with the prescribed rule or changes its behaviour in superficial ways that leave the addressee’s original objective intact” (Batory, 2016, p. 689). The addressee either puts legislative change in the books and this is never put into action, or the he/she accepts measures that render enforcement action inconsequential (Batory, 2016).

The literature also distinguishes between aggregate and individual dimensions of the target compliance, and between multiple targets (Weaver, 2013). As far as the first category is concerned, it is claimed that “aggregate compliance can be thought of as the sum of all actions (and nonactions) of compliance by individuals and organizations who can or might engage in relevant behavior” (Weaver, 2013, p. 246). In this case a policy maker would care more about a high aggregate rate of compliance rather than a low number of noncompliers. With reference to multiple targets, Weaver (2013) claims that the achievement of a policy objective might require compliance from a multitude of targets, most of the times policy-makers themselves do not recognize such target groups. Nevertheless, as the literature shows policy targets come in all shapes and sizes: besides individual citizens (e.g. Winter and May, 2001; Weaver, 2014) policy targets can be officials (e.g. Bardach and Kagan, 1982), bureaucrats, businesses or public organizations (e.g. De Hart-Davis and Bozeman, 2001), states or countries (e.g. Haeder and Weimer, 2013), or even local municipalities (e.g. Versluis, 2007).

One of the most enlightening scholarly works on the topic is Knoepfel’s et al. (2011) chapter on policy actors within policy analysis. Here the authors distinguish between three types of affected actors, that is target group, end beneficiaries and affected third parties. While the



meaning of affected third parties is self-explanatory, the authors challenge the current understanding of the target group. They claim that the end beneficiaries are those who are directly affected by the policy and who benefit from the target's group altered behavior (p. 54). The argument is that schools or hospitals should not be blamed for literacy, ill health respectively, however their altered behavior can contribute in addressing the problem. As I will show later, this wide array of targets puts forward the need to clearly delineate between different levels of policy assembly, especially in multilevel governance settings.

While compliance deals more with behavior, implementation refers to the process in which a given norm is put into practice (Batory, 2016). More explicitly, Van Meter (1975) defines implementation as "the process which encompasses those actions by public or private individuals (or groups) that are directed at the achievement of objectives set forth in prior policy decisions" (p. 447). It is situated between the formulation of a policy and the (un)intended effects of that policy and refers therefore to the stage of policy-making through which adopted policies are put into effect.

Taking in consideration these differences between compliance and implementation, one would ask why there so much confusion around? Both compliance and implementation are similar but slightly different concepts. Compliance refers to a target's behavior with regards to a certain rule. Treib (2014) contends that compliance can occur without implementation while implementation does not necessarily have to result in compliance. Implementation is interested how a given norm is being put into practice while compliance in the outcome, more specifically in terms of rule conformity. The confusion therefore can be explained through the different implementation stages and therefore different targets in each stage.

### **Different Implementation Stages – Different Policy Targets**

A closer look at the studies which claim to be focusing on implementation shows that they are either looking at adoption or transposition, or at monitoring and enforcement, or the

final goal of the policy which is either convergence, harmonization, or changed behavior of the policy beneficiaries. Although some studies distinguish between different stages of the implementation process in multi-level settings and different actors, there is no comprehensive framework for analyzing and operationalizing different implementation stages and the behavior of the involved actors. Distinguishing between such levels represents one of the possible ways to contribute in understanding better the relationship between policy compliance and policy implementation analysis.

In this paper, I follow Knoepfel et al. (2011) distinction between target group and end beneficiaries, and argue that one has to match the different implementation stages with the corresponding policy targets or end beneficiaries. Knoepfel's et al. (2011) argument is also supported by other studies which claim that "actors may play multiple roles simultaneously (e.g. target and implementation agent, implementation agent and entrepreneur) or different and multiple roles at different times" (Flanagan et al. 2011, p. 706). The conclusion here is that in different stages of the implementation process there are legitimate actors who are supposed to act in accordance with the formal stated policy. Whether is the politicians' willingness or preferences when adopting a policy, whether is the ministry's capacity to create a feasible action plan, an agency's motivation or simply the beneficiaries' attitudes to comply, the implementation process has to be dissected in different stages and thoroughly analyzed before declaring a policy as failure or success, or a target group as compliant or not.

By using the case of higher education policy in the European Higher Education Area (EHEA), in the next part I will show how different levels and different stages in the implementation process interact and what is the role of the policy targets (implementers and beneficiaries alike) in enhancing it.

### **Implementation and Targets in The European Higher Education Area**

In Europe, education policy was always under the responsibility of member states and shaped by external influences. It is supposed to be a policy field based on the principle of subsidiarity, with no direct interference in the more distinctive features of national systems (such as the structure and content of curricula and the institutional organization of educational systems).

According to Corbett (2003), Europeanization in education was perceived as something to be avoided, national legacies and traditions being considered as values to be preserved. However, the European Union is constantly expanding the range of its activities and gradually acquiring political and policy influence in fields which were previously outside of its competence. This trend has been referred to as the ‘creeping competence’ of the EU and points to the fact that European institutions are active, if not central, participants in a broad range of policy areas. The Treaty of Maastricht (1992) confirmed through the subsidiarity principle that the main responsibility for higher education policies lies at the national level. However, this did not hinder European institutions from supporting, coordinating or supplementing the actions of Member States in this area.

As such, starting with the late 80s, the Commission developed different higher education programs which aimed at strengthening cooperation between universities and enterprises, promoting student mobility and exchange, encouraging teaching and research in the field of European integration, and even at promoting innovation, equal opportunities in all sectors of education or enhancing the competitiveness of the European labor market. Meanwhile, at the EU level a white paper dating from 1993, “Growth, Competitiveness and Employment”, was stating that one of the foundations of the European economies for sustainable development is creating jobs and in order to do so Europe should exploit its assets and non-physical capital among which education is the first.

However, in the late 1990s emerged the Bologna Process (currently transformed in the European Higher Education Area) – a voluntary agreed, collective and intergovernmental effort to strengthen the competitiveness and attractiveness of European higher education by helping diverse higher education systems to converge towards more transparent systems and to create a harmonized European higher education area (Garben, 2010).

Every two or three years there are Ministerial Conferences organized in order to assess the progress made within the EHEA and to decide on the new steps to be taken. Based on ministers' deliberations, each meeting has produced a communiqué, which indicates the progress that has been made, but also setting new priorities through declarations. The governance of the Bologna represents its intergovernmental aspect which is reflected through the fact that every two or three years there are Ministerial Conferences organized in order to assess the progress made within the EHEA and to decide on the new steps to be taken. Each meeting has produced a communiqué based on their deliberations, which indicates the progress that has been made, but also setting new priorities through declarations. As such, in 1998, through the Sorbonne Declaration signatory countries (more exactly the ministers in charge of higher education) committed themselves to encourage a “common frame of reference, aimed at improving external recognition and facilitating student mobility as well as employability”. It was agreed therefore, to design policies in order to enhance student mobility, to promote the attractiveness of the member states higher education systems by facilitating recognition through a system based on two main cycles, the implementation of the ECTS scheme and of the Lisbon Recognition Convention, the latter aiming to facilitate the recognition of studies including the assessment of qualifications, the recognition of qualifications giving access to higher education, and the recognition of periods of study and of higher education qualifications.

A year later, through the Bologna Declaration (1999) strong emphasis was put on more co-operation in quality assurance and the promotion of the European dimensions in higher

education. In 2001, through the Prague Communiqué member states were encouraged to create lifelong learning policies, to facilitate the partnership of higher education institutions and students in promoting the attractiveness of the European Higher Education Area (EHEA), and policies aiming at the social dimension of higher education, including the access of underrepresented groups. Later on, followed the introduction of stocktaking reports and the doctoral studies as a third cycle and the cooperation with other parts of the world (Bergen Communiqué, 2005), international openness, policies focusing on student-centered learning and the teaching mission of higher education, and also multidimensional transparency tools and funding (Leuven/Louvain-la-Neuve Communiqué, 2009).

Given the specific components of the EHEA including the joint decision-making process between the Ministers of Education from the participating countries, and the commitments or action lines they have developed since its inception, it acts as a policy model which allows participating countries to jointly define common objectives for guiding national policy, to translate guidelines into national action plans and to evaluate and benchmark national performance.

The EHEA is marked by an almost inexistent structure except its own governing (a board, a secretariat, and several working groups), however it relies on the participating countries to accomplish this task. A look at the implementation of the EHEA action lines/commitments shows that the policy formation and decision-making stages are delegated to the domestic level through the country representatives (Ministers, agency representatives). These commitments have to be incorporated into domestic legislation or frameworks, and then the responsible bodies at the administrative level should come up with national action plans or measures which are then taken over by higher education institutions, and monitored and enforced by the legal system and other governmental agencies.

*Table 1. Multi-governance levels and policy stages in the European Higher Education Area*

<b>The European Higher Education Area</b>	<b>Implementation stages</b>
<b>Supranational level</b>	Policy formulation/ Decision-making
<b>Country level</b>	Adoption
	Transposition
	Implementation
<b>Supranational level</b>	Outcome / Convergence

Table 1 shows the ideal policy design of the EHEA, namely a policy model (conveyed through the commonly commitments) which is used for the development of national policies, first by adopting the necessary legislation which provides a legal framework for addressing the policy issue at hand. Once the necessary framework is adopted at the national level the next step for the competent authorities is to translate these policy provisions into operating guidelines, action plans strategies, etc. The implementation phase refers to the stage in which these policies are put into effect at the higher education institutions level. In other words, it refers to the practical implementation European integration scholars talk about when referring to the establishment of the necessary agencies, tools and instruments, monitoring and compliance mechanisms at the lowest institutional level (Versluis, 2007, p. 53). The adoption, transposition and practical implementation stage involves solely the country at hand and its capacity to put in practice what is desired. Unlike other studies which included the monitoring and evaluation/enforcement stage, in this framework these stages are not considered stand-alone stages but rather cross cutting processes which occur both from the supranational level (e.g. national implementation reports) and from the national level (e.g. reports and evaluations from different agencies on the ground – e.g. the Romanian Agency for Quality Assurance in Higher Education). Last but not least, as stated in the BP goals, ideally these policies will lead to convergence across participating countries, that is the process of becoming more similar, a

coming together of two or more distinct entities or phenomena. This final stage refers mainly to the final outcome of all participating countries, and the summing up of their achievements.

These different stages within the EHEA portray a rather simplistic and general cycle which puts forward a complex mechanism through which country representatives, EU institutions and international bodies come together and set the higher education agenda for the region. Through cooperation in higher education countries can strengthen their higher education system, and address common problems which otherwise could not be dealt with at the national level or alone. For policy-makers, introducing reforms through a common initiative would be easier than facing the potential opposition at the domestic level, as cooperation can overcome resistance from universities, academics and students alike. Besides, it is a driving force in moving forward common reform agendas, it allows countries to engage in joint actions and deliver common services, and enjoy the potential benefits of cooperation. Broadly speaking, cooperation in higher education can contribute to fostering greater regional integration, competitiveness and economic growth. However, reaching the common objective of convergence, harmonisation, compatibility, comparability and the creation of a common European higher education area requires to explore what are the driving forces which stand between what is intended (policy model) and what is expected (outcome/convergence).

Notwithstanding its legally-unbinding and strong intergovernmental character, participating countries have implemented many elements of the EHEA. Implementation studies had shown that indeed participating countries move towards the same direction, however they do so at varying degrees and paces. This, in turn affects the desired end goals of “full harmonization” and policy convergence with regards to the overall commitments, in other words to make the European higher education systems to “more alike, to develop similarities in structures, processes and performances” (Heinze and Knill, 2008, p. 498).

Veiga and Amaral (2006) claim that the OMC presents several problems which do not allow for a “full” implementation and coherent results. It is argued that the EHEA is a complex (different national contexts, interests and objectives, time horizons, electoral politics, etc.), top-down process and involves different levels (European, national and institutional), and accordingly this leads to implementation problems. Their main argument is that higher education institutions have a certain degree of autonomy which questions the “rational top-down linear process,” the basic assumptions of OMC. Moreover, they argue that since member states have their own national higher education policies the use of soft law is not effective, the OMC is not an appropriate mechanism for implementing the EHEA, and since there are many tensions between European and national level there is no coordination for a coherent implementation. In sum, as Sin et. al. (2016) claim, soft law mechanisms produce “integration but in practice generate eclectic, divergent, unpredictable or perverse outcomes” (p. 3).

A closer look to the last implementation report shows that there is a lot to be done. What is puzzling is that there is not only a clear uneven implementation in terms of the commonly agreed policy areas as mentioned above, there is also an uneven implementation across countries and regions. What is even more puzzling is that implementation results/outcomes cannot be categorized based on the Western Europe – Central Eastern Europe distinction, higher education systems or governance types, there is no clear pattern of implementation given the existing similarities across different higher education systems.

The focus on the adoption, transposition and practical implementation stages has been triggered by the fact that these stages represent, as presented in Table 1, different levels of implementation and therefore allow for a better understanding of how national level factors contribute in unpacking the implementation of international voluntary agreements. For example, a country can have in place the required legal framework however there is nothing concretized in term of actual policies. Such a differentiation would allow for a better



understanding of how different stages develop and the extent to which they precondition each other. Moreover, this aspect is relatively under-studied, the existing scholarship lacking a theoretically grounded and methodological sounded explanation for illuminating why certain intentions or visions are visible in practice

### The Romanian case

Bringing in the discussion between different implementation stages and different actors/ targets, based on the above model, in the next section I develop a more comprehensive framework which allows to capture the connection between these stages and the responsible levels and actors for each of them. The table below has been developed after assessing how Romania (member from 1998) responds to the Bologna Process.

*Table 2. Policy stages and policy targets in the European Higher Education Area*

<b>The European Higher Education Area</b>	<b>Implementation stages</b>	<b>Responsible levels</b>	<b>Responsible actors and their roles</b>	
<b>Supranational level</b>	Policy formulation/ Decision-making	International Bologna structures	Country representatives, stakeholders	
			Decision-makers	Policy entrepreneurs
<b>Country level</b>	Adoption	Central level	Parliament, Government	
			Policy targets	Decision-makers
	Transposition	Administrative level	Ministerial agencies and bodies, the academic community, higher education experts and professionals, interest groups	
			Policy targets	Policy implementers
	Implementation	Institutional level	Higher education institutions (including staff, academics, students)	
			Policy targets & implementers	End beneficiaries
<b>Supranational level</b>	Outcome / Convergence	System wide	Participating countries	
			Policy targets	End beneficiaries

As the above table shows higher education policy stands completely in the hands of the participating countries, however the EHEA structures provide many opportunities for peer learning, trainings, seminars, forums and other such tools which create the possibility to bring upfront best experiences, obstacles and challenges in implementation but also to create a space for dialogue between the different stakeholders. While it is clear that legislators have to legislate, public officials to administer and executives to execute, in general policy actors play multiple roles (Biggs and Helms, 2014). The above framework even though its is a rather simplistic one, provides a starting point which better allows to analyze different dynamics in the implementation process. The multiple roles of the policy actors above show how complex, ambiguous and in the same time politicized the policy making process is.

While each of the level has its own category of policy actors, decision-makers, implementers, targets or end beneficiaries, in this context each of these categories become targets which have to align their behaviour with the supranational requirements. It is expected therefore that they will act in conformity with the required policy. For example, in the case of the social dimension (EHEA action line related to access, equity, equal opportunity to quality education and widening participation of underrepresented groups), all these levels are engaged and expected to do their job, most of the times their success depends on the success of the previous stages and actors. For example, if there is national strategy for it, the likelihood of higher education institutions incorporating such measures is low. On the contrary, there are cases when higher education institutions can circumvent national processes, and implement what fits with their institutional development plan. This is the case of quality assurance policies or mobility programs.

On the one hand, this duality or multiplicity of roles contributes in understanding actors' multiplicity of roles in the implementation process, on the other hand this differentiation helps in grasping a better understanding of the factors which implementation, by dissecting different

levels in the implementation process, different stages and different types of targets for each level and stage.

While the Romanian case can not be further examined currently due to the lack of empirical evidence, other studies which approached different policy areas and countries within the Bologna can sustain the proposed framework. I will try to provide several examples.

For example, Moscati (2009) looks at the implementation of the BP in Italy. He argues that the existing type of higher education system in Italy (one of the most traditional ones in Europe) was one of the obstructing factors in implementing the Bologna reforms. He also finds that the type of government and the support from academics matters.

Veiga, Amaral and Mendes (2008) aim to provide a general overview on the major factors facilitating the implementation of the Bologna Process in four countries (Spain, Italy, Portugal and Greece). Their findings show that universities as stand-alone institutions and as policy implementers and end beneficiaries, with their autonomy can circumvent the central level and decide which policies to take on board or not. Another major finding was the role of academics, students and staff and their support (through advocacy and lobby, methodological proposals, etc.) or resistance in welcoming higher education initiative.

Last, Kettunen and Kantola (2006) look at the quality assurance aspect and aim to identify the responsible bodies and institutions involved in the implementation of the Bologna at different levels. Their findings show that “quality assurance is most effective when it is located close to teaching and learning. Therefore, education policy should be implemented using the methods of strategic management and quality assurance at the levels of higher education institutions, departments, degree programs, teachers and students” (Kettunen and Kantola, 2006, p. 266). In line with the existing literature, this paper supports the idea that lowest rank institutions matter and they have many times a final say in the implementation of reforms.

## **Conclusion**

This paper aimed to bring a different point of view on the implementation literature by shedding light on the relationship between implementation and compliance. While it does not claim that the approach used here can be used in other settings, it contributes in understanding the implementation of international voluntary agreements, especially processes or initiatives which fall under the multilevel governance. The paper distinguished between different levels and stages of the implementation process and distinguished between the multiplicity of role of the policy actors in each of these layers and stages.

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