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Title

**A comparative analysis of policy transfer cases in the road transport sector.
Underlying features that shape transfer success.**

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Introduction

A central observation of policy transfer studies is that within a connected and globalised world, the opportunities for sharing ideas, learning from others and observing different approaches towards the same problem have never been greater. Across levels of government within federal systems, between nearby countries within regions, and more broadly across the world, governments and their agencies are actively engaged in observing, learning and sharing information on how to address policy challenges. This ongoing process of interjurisdictional interaction occurs within the broader context of operational pressures governments face to improve their efficiency and do better with the resources they have for dealing with contemporary policy problems. All organisations seeking to progress operational efficiency and lift their strategic effectiveness look at how others do better. This is common for both public and private organisations. This paper explores this process and provides a comparative analysis of two case studies that observe the transfer of transport regulation and compliance policy from Australia to South Africa and from Australia to Sweden. The purpose of this comparative analysis is to critique in more detail the applied value that derives for governments and their agencies when engaged in policy transfer activities. Do these cases reveal evidence of active searching for how to do things better or is there more at play in the process of policy transfer?

An emerging paradox is evident within the policy transfer space between the political rhetoric of leaders and parties who seek to disengage from global policy frameworks and the active work of public sector agencies, experts, industry and community groups who are engaged in the practice of sharing of ideas, systems and policy models. So while the political leaders of some national governments seek a return to local things that made them great, at the operational level agencies have never been more open and active in sharing ideas and trialling new policy approaches. In fact, it would be negligent of agencies and their governments not to look elsewhere and enquire if other states and countries have found a way to deal with a particular policy challenge in a more effective and efficient way. It is within this context that this paper seeks to explore both the

nature of the collaboration and engagement that occurs and also what the gains are for jurisdictions and their policy sectors when representatives pursue collaborative work around policy transfer. Here the analysis goes beyond simply considering what was transferred and how it now works, to what structured the nature of collaboration and engagement and facilitated the transfer (and translation) of policy into another context. Discussion also asks how might the development of theory and the specific findings from this field of research prove useful for policy and regulatory practice as agencies search for solutions to the contemporary challenges they face?

This paper is organised into six sections. Following the review of the literature is a discussion on methodology. The evidence collected for each case study involved intensive qualitative work which has been an effective methodology for eliciting evidence and insights that address the analytical focus of this paper. Section four provides a succinct overview of each case study. The purpose here is to highlight the characteristic features of each transfer process. The case study overviews reveal the diversity of mechanisms under which transfer can occur and also highlight key features that display the collaborative engagement that is common to both cases. The analytical discussion follows and identifies six underlying features that are characteristic of voluntary and collaborative policy transfer. The paper is then brought to a conclusion.

A Review of the Literature

A notable feature of the policy transfer literature is the relative agreement on definition of concept. For the majority of authors the starting point is the definition provided by Dolowitz and Marsh (2000) where transfer is described as the movement and adoption of policy, programs or administrative systems from one jurisdiction to another. This definition is further refined with attention paid to processes of transfer, considering whether this occurs within a coercive or voluntary context. Central to the analysis is the idea of learning (Rose 2000) and how the challenges of addressing social, economic and environmental concerns encourages public sector agencies and their officials to look to other governing

systems and the ways in which they have addressed similar concerns. Learning is particularly evident under voluntary processes of transfer, though it still remains central to the success of transfer characterised under more coercive circumstances. Rather than a contested field, scholarship on policy transfer tends to have an increasing focus on exploring where we might observe this phenomena occurring and analysing how the process of transfer manifests itself and is shaped in particular cases (see for example, the range of cases presented in Hadjiisky et al, 2017).

In their recent review of the policy transfer literature, Hadjiisky et al (2017) articulated numerous fields of study that bring with them distinctive frames of analysis that shape our understanding of policy transfer. Of these frames there are two areas of analysis that are most relevant to this study. The first is diffusion/learning/policy transfer in which the focus is on lesson learning and the rational assessment and transfer of policies through a predominantly voluntary process. The second frame taken from this work concerns the socio political conditions of policy transplantation; the focus being on the analysis of the institutional, cultural, political and environmental factors that impact upon transfer processes. In this study we are interested in identifying the shared policy objectives that brought jurisdictions together. Within this context the nature of the policy instruments and administrative systems that then become the vehicles that characterise implementation also forms an important point of interest. To a large extent these instruments and systems are reflective of what is achievable within the local institutional, political and cultural environment.

As policy is adjusted and modified for local circumstances, the socio political analysis of transfer and implementation inevitably directs our attention to translation. Page and Mark-Lawson (2007: 49) suggest policy transfer that involves a 'straight-forward...simple movement of a set of policies from one place to another with no (or limited) change of state' is rare. Peck and Theodore expand the complexity of the process of policy transfer, proposing that it is 'not one of simple emulation and linear *replication* across policymaking sites, but a more complex process of nonlinear *reproduction*' (2010: 170 [original emphasis]). This process can be 'visualized as a field of adaptive connections,

deeply structured by enduring power relations and shifting ideological alignments' (Peck and Theodore 2010: 169). The complexity of this 'messy interpretative' process (Stone 2017: 55) is further deepened when a variety of diverse and influential factors associated with the unique circumstances of the receiving jurisdiction are taken into account. Domestic policymaking processes (Béland 2005), institutional arrangements (Manwaring 2016), economic and social conditions and historical experiences (Sayim 2011) and culture (Marsden and Stead 2011) are just some elements that influence the transfer of policy. This multifaceted field, coloured by interweaving and relating factors, calls for flexible and responsive forms of policy transfer (Desai and Snavely 2007, Peck and Theodore 2010). Evans (2009) states that if the transfer of policy is to be successful the process must be driven by local actors. It must be 'compatible with the value system of the recipient organization, culturally assimilated through comprehensive evaluation and piloting, builds on existing organizational strengths and delivers public value in terms of direct or indirect social or economic benefits' (Evans 2009: 402). In this study the analysis aims to highlight the role of local actors in successful policy transfer as well as the critical contribution played by collaboration, ongoing interaction and form of this engagement between jurisdictions and how this has helped progress processes of *interpretation* and *cultural assimilation*.

Picking up on the theme of the success or failure of policy transfer, Stone (2017: 56) proposes that understanding policy transfer as being 'rarely a perfect process of transmission' means that the 'binary distinction between "success" and "failure" is inappropriate'. Policy transfer 'has multiple dimensions, often succeeding in some respects but not in others, according to local circumstance and actors, and upon perception and interpretation' (Stone 2017: 56). In some instances the transferred policy may look 'completely different' in the receiving jurisdiction (Stone 2017: 56). This may have come about through a process of localisation, described as the adaption and modification of policy to suit local conditions (Stone 2017). Rather than view this change as an example of policy failure, Stone (2017: 65) urges the reader to adopt a 'morphological stance of policy ideas' that 'allows us conceptual space for a valorisation of translation and

interpretation'. By recognising the importance of learning lessons from processes of trial and error, it becomes possible to make sense of the policy issue in different and dynamic ways (Stone 2017). This study involves two cases of policy transfer that have both undergone significant modification and adaption to suit local conditions and the objectives of local actors. When reviewing these cases Stone's (2017) insights into the complexity of the translation and adaptive process is helpful. Rather than conforming to the binary view of success and failure as critiqued by Stone, it is possible to draw lessons from these case studies that can be applied to greater arcs of policy development. A primary objective of this paper is to highlight the applied benefits for policy and regulation practitioners that might emerge from being engaged in policy transfer projects.

Within the literature it has been acknowledged that a gap exists, with instances of policy transfer involving 'developing' states being overlooked by a preoccupation with case studies involving jurisdictions in the global North (Marsh and Sharman 2009, Marsden and Stead 2010, Sayim 2011). This study both conforms to historical biases and examines one case that involves the transfer of policy from Australia to Sweden. However, the second case involving a regulatory policy being transferred from Australia to South Africa examines the phenomena within a developing state context. So we explore two distinctly different cases that are linked by virtue of sharing the context of road transport policy. The inclusion of the South African example will also put to the test the argument that the transfer of policy is more likely to be a smooth process where it occurs between states with similar cultural, institutional and legal structures (De Jong and Geerlings 2005, Clavier 2010). Sayim (2011) has lead the challenge in this area, proposing that the economic, developmental and historical experience of a 'less-advanced' receiver country may result in an enthusiasm and openness to importing policy ideas from abroad. The case study involving policy transfer to South Africa tends to confirm this claim.

Methodology

This study undertakes a comparative policy analysis, looking at two distinct and unique examples of policy transfer. The first case study involves the transfer of a regulatory program that involves the satellite tracking of trucks to confirm compliance to route and other monitored conditions (speed for example). This program, known as the Intelligent Access Project (IAP) was transferred from Australia to Sweden. The second case also involves a program of regulatory compliance, however in this case the focus is on motivating compliance to higher safety and performance standards through a program of voluntary accreditation. The Australian program, the National Heavy Vehicle Accreditation Scheme (NHVAS) was transferred and adopted in South Africa as the Road Transport Management System (RTMS). Comparative policy analysis allows for a detailed investigation that highlights the dynamic factors involved in each case study while attempting to extrapolate these findings to make more general observations that are applicable to a wider understanding of what shapes policy transfer (Rihoux and Grimm 2006). This method makes possible the development of insights that may not have been gleaned from only analysing one particular case and so builds our understanding of the policy transfer process (Otenyo and Lind 2006, Rihoux and Grimm 2006, Cheyne and Hambleton 2011).

Both cases have been analysed using qualitative research methods involving interviews, participant observation and analysis of relevant literature and documents. A unique feature of this comparative study is that interviews were conducted with actors directly involved in the transfer process. The IAP case study involved the conduct of 22 interviews. This included eight interviews in Australia with representatives from transport agencies (Transport Certification Australia), IAP telematics service providers, truck industry associations and truck industry consultants. These interviews provided an in-depth understanding of the functioning of the IAP and insights into the transfer of the IAP to Sweden. Subsequent research in Sweden involved fourteen interviews with representatives from the national road transport agency Trafikverket, truck manufactures, road safety research centres, academic experts, logistic firms, hauliers and industry associations and consultants to the industry. As well as interviews research involved participant observation at policy and stakeholder

meetings where road transport policy reform and the functioning of the IAP trials in Sweden were discussed. This data was supplemented with the analysis of agency reports and policy papers relevant to the IAP and the process of heavy vehicle transport reform in Sweden.

In the NHVAS/RTMS case study 12 interviews were carried out with key informants that have been active in the transfer and development of the RTMS in South Africa. These informants included representatives of government transport agencies (national and provincial) and trucking industry associations, truck operators, auditors and actors from the banking and insurance sector. The analysis also involved participant observation, attending and observing national RTMS Steering Committee meetings and industry workshops, which provided further insights into the functioning of the RTMS in South Africa. Before moving to the analysis of aspects of transfer that are common and distinctly different for each case a more detailed account of each example of transfer is provided below.

The Policy Transfer Cases

The Intelligent Access Program (IAP) – From Australia to Sweden

The Intelligent Access Program (IAP) is a national voluntary program for heavy vehicles administered by Transport Certification Australia (TCA). Utilising the Global Navigation Satellite System (GNSS), participating vehicles are monitored for route, speed and time. In return for permitting 24/7 monitoring of vehicles, transport operators gain regulatory concessions such as improved access to the road network for high-risk vehicles. These might be heavier and longer vehicles, or involve unique vehicle configurations and transport routes that deliver significant productivity advantages to trucking and transport operators. IAP allows regulatory agencies to more effectively manage risk by linking 24/7 electronic monitoring with high risk road users. Through the IAP system both the productivity and efficiency of the road system is maximised while risks (non standard vehicles and loads) are constantly monitored.

Under the IAP system transport operators must have an electronic device installed in their vehicles that transmits information regarding compliance to their chosen IAP Service Provider. As Figure 1 illustrates, the IAP involves the interaction of different actors that each possess defined roles and responsibilities (TCA 2016). TCA are responsible for certifying and auditing IAP Service Providers. Certification ensures systems are sufficiently tamper proof and remain in effective working condition to provide a reliable compliance regime. IAP Service Providers are responsible for supplying and operating IAP services to transport operators, including installing the in-vehicle units. Transport operators pay a fee for the services delivered by their chosen IAP Service Provider. Road authorities specify access conditions and entitlements that transport operators are expected to adhere to. This information is shared with TCA and included in the IAP framework of conditions accessed and monitored by IAP Service Providers. Although participating vehicles are monitored constantly, only data pertaining to a breach of specified access conditions is of interest to road authorities. In the event of noncompliance, for example a transport operator travels off an approved route or is detected not adhering to the speed limit in a specific location, a report is electronically generated by the IAP Service Provider and sent to the relevant road enforcement authority. The receiving road authority will analyse this report, assessing whether action or a penalty for the offending transport operator is warranted.

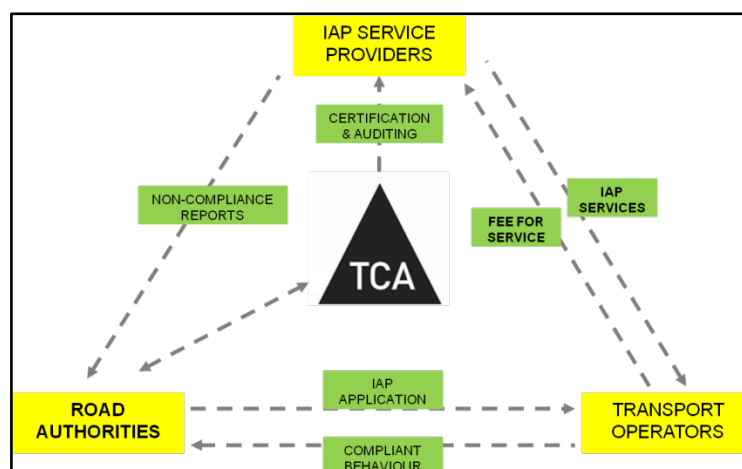


Figure 1: The IAP Operational Framework

The IAP and Sweden

Swedish interest in the IAP was stimulated by a presentation on the concept at the 2009 Intelligent Transport Systems World Congress held in Stockholm. The concept was considered a possible compliance tool that could help address similar constraints the Swedes faced with regard to providing greater road access for longer and heavier vehicles, particularly in the forestry sector. Interaction and interest in the IAP concept continued to develop during 2010 and 2011 with visits to Australia by Swedish transport officials, academics and road transport industry representatives. During this formative period policy officials from both countries developed strong interpersonal connections and both parties developed a better understanding of how the functionality of the IAP might fit within the policy and road transport compliance framework in Sweden. In 2012 a memorandum of understanding was signed by TCA and the Swedish Transport Administration (Trafikverket), providing a structured framework for their working relationship. In 2014 a three year trial of the IAP commenced in Sweden and this was supported with a visit of TCA staff to trial sites. The IAP trial involved a range of Swedish transport industry stakeholders and the TCA was a partner in this process. Officials from TCA participated on the trial steering committee and the organisation provided technical support. A unique feature of this case of policy transfer is that the central operational components of the IAP remained based in Melbourne, Australia. Swedish vehicles participating in the trial were remotely monitored from Australia, with noncompliance reports being generated and sent via the telematics provider (also based in Australia) to TCA. TCA would then forward these infringement notices to Trafikverket and the trial managers in Sweden. This feature of the IAP trial enabled Swedish stakeholders to experiment with and experience the IAP in their local context whilst avoiding the large costs associated with duplicating the IAP back office infrastructure that supports the program in Australia.

Swedish transport officials managed the IAP trial through a highly engaging and consultative process. A range of stakeholders were involved in the trial including

national transport agencies, researchers from the Swedish National Road and Transport Research Institute (VTI), the forest research institute, Skogforsk as well as truck manufacturers Volvo and Scania. The organisational arrangements for the trial embedded the analytical and assessment activity into local policy analysis and policymaking processes. The progress of thinking, analysis and the interaction of actors over the duration of the trial effectively became the process through which the IAP policy was translated and assimilated into the local context. The IAP trial concluded in late 2016 and in early 2017 it was announced that a modified version of the IAP would progress to implementation. These modifications place greater reliance on existing in-vehicle technology supplied by local vehicle manufacturers Volvo and Scania, and involved a phased approach from auditable self-tracking by firms to an eventual national remote tracking system. The regulatory scheme is known as Intelligent Access Control (IAC) (Wendel 2016) and applies to vehicles that carry extra weights (up to 74 tonne) beyond the standard limit of 64 tonne.

The National Heavy Vehicle Accreditation Scheme (NHVAS) – From Australia to South Africa

The National Heavy Vehicle Accreditation Scheme (NHVAS) is a voluntary regulation scheme administered and managed on a national basis by the Australian National Heavy Vehicle Regulator (NHVR). The scheme consists of three modules under which a transport operator can gain accreditation. This includes mass management, maintenance management and fatigue management. Participation in the NHVAS requires operators to meet higher standards in compliance practice than those stipulated by the general regulations. This is assessed by approved auditors who examine operating systems, record keeping and business practices. For those operators that meet the requirements and gain accreditation, certain concessions on regulatory limits are provided that provide an economic advantage. For accreditation under mass management this means eligibility to carry up to three tonnes above the regulated limit; for maintenance, operators are exempt from annual vehicle inspections; and for fatigue

management there are more liberal limits for driving hours (NHVR 2013). The varying modules and concessions are designed to encourage and reward better compliance in key areas of safety concern, specifically the maintenance of vehicles, loading practices and better management of driver fatigue. Accredited vehicles also receive a sticker that is displayed on the vehicle to identify its status and also means that drivers are more likely to be waved through at road side stops and inspections. Random audits and spot checks can be requested or carried out by the national regulator (NHVR) to help validate compliance to scheme standards and to reduce any wrong-doing and manipulation of data.

In Australia the NHVAS is popular amongst the trucking industry, with approximately 100,000 vehicles enrolled in one or more modules of the Scheme (NHVR 2016). The management and enforcement of NHVAS has a strong focus on educative engagement. The scheme aims to encourage better compliance practice through regulatory concessions and incentives rather than punitive enforcement measurements such as penalties and fines. Regulators and industry associations are supportive of the scheme, viewing it as an effective supplement to the existing regime of prescriptive enforcement (Baas 2008; Walker 2012).

South Africa and the Road Transport Management System (RTMS)

On an internationally comparative basis the trucking industry in South Africa has a very poor safety record. For example, its annual fatality rate is at least seven times greater than Australia (OECD 2011: 176). In the early 2000s national transport agencies began to search for alternate approaches that might improve industry compliance to regulatory standards and lift the safety performance of operators. A national report on the safety performance of the trucking industry suggested the Australian experience with NHVAS might present opportunities for improvement (Steyne, Nordengen et al. 2004). Following this report, a process of engagement and discussion commenced between Australian and South Africa transport regulators. There was already some level of familiarity between officials based on interaction at international forums and joint participation on OECD research projects. This was subsequently intensified through a series of

visits to Australia in 2003, 2004, 2005, 2010 and 2013. These visits involved transport agency officials (national and provincial), industry representatives and a leading industry specialist from the national industrial research institute (Council for Scientific and Industrial Research (CSIR)). During these visits Australian transport officials showcased regulatory and enforcements systems and provided access to transport operators who demonstrated innovations in practice as well as providing evidence of their experience under programs such as NHVAS. This level of regular interaction was supplemented with further engagement between officials at international forums such as the bi-annual International Symposium on Heavy Vehicle Transport Technology (HVTT). Regular interaction helped build strong cooperative relationships between Australian and South African officials and this facilitated a willingness to share information and provide advice on policy challenges. In particular, key officials from the then Australian National Road Transport Commission (NRTC) and the South African Council for Scientific and Industrial Research (CSIR) developed close working relationships that involved the regular exchange of information and engagement in joint problem solving.

With the regular provision of information and advice from Australia, South African transport officials developed their own local version of NHVAS and introduced the Scheme in 2003. The scheme, known as the Road Transport Management System, was modelled along the same lines of the NHVAS. It was voluntary in nature and relied on an audited assessment of the operator's systems, records and practices against specified standards. However, unlike the NHVAS, the RTMS has a much more expansive range of operational standards and operators are expected to meet all requirements under the scheme rather than selecting optional modules. The scheme covers driver wellness (such as management of driving hours, diet, HIV prevention and testing), vehicle operations (including driver training and maintenance), vehicle loading and business productivity (including record keeping) (Nordengen and Oberholtzer 2007).

A major point of divergence from the NHVAS model was that the RTMS was developed as a hybrid model with significant involvement of industry in the

design, management and operation of the scheme. RTMS is managed through a national steering committee comprised of representatives from national and provincial road agencies, truck industry associations, representatives from consignors, the banking and finance industry, the national industrial research institute (Council for Scientific and Industrial Research (CSIR)), major trucking industry operators, representatives from the truck sales and manufacturing industry and the insurance industry. The RTMS steering committee meets regularly to discuss compliance standards and operational matters and undertakes promotion and education campaigns to showcase the benefits of membership and to grow participation in the scheme. The ways in which the programme is funded and managed also differ from the NHVAS. Unlike the Australian scheme, state funding is not provided for the administration of the RTMS. Rather, membership fees are expected to cover operational costs. The scheme also has a stronger reliance on market incentives to encourage compliance and enforcement, such as branding, financing discounts through banks and insurers, and incentive requirements from major contractors in the transport chain. The scheme is not enforced or monitored by national or provincial inspection agencies, however it is relied upon by some provinces (Kwazulu Natal for example) as a requirement for approval of non-standard vehicles (extra long car carriers and innovations driven through performance based standards). The scheme does assist with enforcement discretion and at some provincial checking stations vehicles displaying the RTMS placard may be waved through.

The RTMS is reported to have an impact on heavy vehicle compliance and road safety. In addition to the general benefits of improved operator compliance, the RTMS steering committee has been proactive in working with provincial governments and the timber, coal and sugar cane industries to address overloading and poor vehicle maintenance. These targeted trials have been reported as effective in reducing the erosion of infrastructure and preventing major road accidents within specific regions (RTMS 2012).

Discussion and Analysis

When reviewing the above two cases the comparative analysis has identified six underlying features that can be seen to characterise policy transfer work. These features, elaborated below, provide guidance to what shapes successful policy transfer and also points to the gains for practitioners who engage in this work.

1. Policy transfer is initiated and sustained between parties around shared core policy objectives and concerns.

The two case studies highlight how the initial interaction of public sector agencies commenced with the identification of a shared interest in similar policy or regulatory objectives. The cases show that it is this shared concern for seeking the same policy outcome that has been the starting point for conversations, the sharing of information and the initial willingness to investigate how action is mobilised around a similar policy problem in another jurisdiction. The interest in shared policy objectives is also the glue that helps sustain relationships and interaction over time. Policy transfer takes time (Pal, 2017) and relationships and engagement are effectively sustained over this period while the shared interest in problems and solutions endures.

2. Policy transfer is essentially founded on relationships between people.

Policy work involves people and policy transfer is fundamentally shaped by the shared willingness and interest of particular people to work together on similar problems across different jurisdictions. In each case study the drive for action and the sharing of information has been led by identifiable champions of transfer (Oliveira 2017). Relationships form between people located in organisations that work on similar policy challenges. Where these relationships are robust and enduring the chances of transfer are strengthened and sustained over time. The two case studies show that despite the capacity to share and remotely communicate information, it has been the physical interaction and engagement within another jurisdiction that has given impetus to the commitment to engage in policy transfer activities. Site visits, interaction and the direct verbal exchange of ideas and experiences have been a central process of committing to policy

transfer. In some sense each case demonstrates that 'seeing is believing' and this has strengthened the efforts of champions of transfer in progressing their objectives to reshape local policy practice. In both case studies it was observed that the positive social relations of people across jurisdictions was a major factor that sustained ongoing interest and commitment to policy transfer. Through close collaborative relationships policy workers developed a shared interest in supporting the successful transfer of policy to another location. The act of showing an interest and being prepared to work with colleagues across jurisdictions is an underlying foundation of policy transfer practice.

3. Engagement in transfer ranges along a continuum from the casual exchange of information to formal structured mechanisms for interaction and the exchange of information.

The two case studies highlight that while relationships and people are central to instances of policy transfer, the nature of how this interaction occurs may vary significantly. In the case of policy transfer to Sweden, relationships and interaction were structured within a formal framework of commitment and practice. Traditional administrative instruments such as a MOU, a joint steering committee and an official project trial shaped the manner and boundaries of interaction. The formal structure did however, generate a sense of certainty that transfer (in some form) will occur. Tension arose in the transfer of policy due to the formal nature of the trial. The formality of the process meant that stakeholder engagement, interaction and management of tension occurred within a more procedural construct. This meant that there was more at stake for both negative and positive critiques of the trial.

Formalising the process of interaction over the period of transfer represents one end of a continuum of possible forms of engagement. The South African case study, while formal in the sense of organised delegations scheduling regular engagement to observe and learn of different policy practice, essentially relied on the personal relationships of a few staff from each country who were similarly involved and prepared to share information on road transport regulation and reform. The sharing of ideas occurred on an ad hoc basis and information

exchange was undertaken to assist in considering options and potential pathways. However, this was not carried out with the expectation that immediate action would follow. From the Australian perspective there was a willingness to share information and evidence of experience without an expectation about how the South African's might use or act on this material. There was less certainty in this process that transfer would occur. The process was therefore casual and unstructured, relying on South African officials to initiate requests and then assess the utility of the information and advice provided. In this case transfer was the result of committed adopters working in South Africa who found willing providers of information in their Australian counterparts. In contrast to the Swedish case however, at this casual end of the spectrum there tends to be less engagement and buy in from the original jurisdiction and transfer is driven by the desire for change emanating from the adopting location. In these situations the advocacy and enthusiasm of a champions of transfer are central to the ongoing success of the transfer process (Oliveira 2017).

4. Engagement mechanisms (regardless of their formal or informal nature) are inherently linked to local policy making processes.

The observation here is that policy transfer involves a process of 'localisation' (Stone 2017) and this is progressed through engagement mechanisms. The two case studies show that regardless of the level of formality that structures the interaction of transferring states and their representatives, processes are inevitably embedded within local policy making structures. In the Swedish case the formal administrative structures of a steering committee and a three year trial became a means of linking analysis and decision making into local processes. These administrative tools became the vehicle for local stakeholder participation. They provided avenues for critique and reflection on how the transferred policy might be translated into local operation. The administrative arrangements also formally structured the interaction and engagement of the transferring party (Australian officials) and endorsed their role as transfer agents within the local policy process.

Ironically, in the South African case it is the absence of formal structures that defined engagement that allowed information on the transferred policy to immediately flow into local policy making processes. Decision making and development of the RTMS was shaped by South African stakeholders, informed about how something similar works in a different context. There was no formal recognition of the Australian transfer agents in the local policy making process and input was derived through interpersonal relations, rather than from formal administrative obligations. The immediate embedding of transferred information into local processes permitted freedom to modify and reform the original policy design and reshape it into a framework and operating system that was attuned with the local context. These case studies demonstrate that regardless of the nature of engagement and interaction, successful policy transfer will inevitably result from explicit links with local policy processes.

5. Policy transfer involves the movement of ideas, systems and processes into a localised context.

The above discussion has pointed to this important feature of policy transfer. The embedding of processes of interaction into local policy making frameworks naturally drives the movement of ideas, systems and processes into a localised context. Local stakeholders, institutions and culture reshape the shared understanding of how an ideal policy should work. It is here that we see dominant local forces reshape policy to reflect their interest. For the case studies presented in this paper it is the dominant neoliberal forces and market interests that have come into play to reshape policy to advance dominant local interests. In each case policy transfer is occurring within a highly competitive sector dominated and effectively shaped by market forces. In the South African case important actors stepped forward to play a role in policy development and implementation to help advance and secure the profitability of markets. In this case we saw market players align their commercial interests with the advancement of state goals associated with road safety. The localised action and analysis of stakeholders supported an arrangement that helped reduce risk and strengthened markets. A safer trucking market would become a more reliable and less risky investment. In the Swedish case it was the power of local

multinational firms that played an active role in promoting a policy design that aligned with local technical capability and operational preferences. Both case studies demonstrate that the process of localisation increasingly means transferred policy being reshaped to support market interests and practices that characterise the local policy sector. This may occur through a formal structured process or in a more casual and responsive process to local circumstances.

6. Engaging in policy transfer lifts the analytical capacity of jurisdictions to critique, respond and develop solutions to local problems.

We work in a time where governments seek to restrain public expenditure and in some cases cut and reduce departments. The case studies demonstrate that engaging in policy transfer can facilitate access to a significant body of analysis in the form of Jurisdiction A's knowledge and experiences that Jurisdiction B does not have. In these situations, analysis does not need to be performed in Jurisdiction B, it is made available via the transfer process. Here we see how policy transfer goes beyond the actual movement of an idea or policy from one jurisdiction to another, but also provides access to a body of knowledge and experience that facilitates and assists the problem analysis and critical thinking that is an inherent part of local policy formulation processes. This represents one important aspect of policy work that the transfer literature has not thoroughly critiqued. The case studies examined here show that the analysis that takes place at this stage has subsequently shaped local implementation decisions.

Policy transfer therefore, represents an increase in analytical power as the experience, lessons and analytical skills of two jurisdictions (rather than one) are involved in problem-solving around a common policy issue. This enhances the ability of Jurisdiction B to expand their own knowledge base in order to formulate a policy solution or develop a tool that suits and addresses their own unique local conditions. The extent to which this occurs is significantly shaped by the nature of interpersonal relations and the networks of individuals and actors involved in policy transfer. Other significant factors include how open actors are to sharing information and providing support during the transfer process. Engagement in shared analysis also presents opportunities for further learning

by the transferring jurisdiction where the new adopting state introduces refinements and adjustments that may sharpen policy effectiveness. Policy transfer activity can provide valuable feedback and contribute to the policy development and improvement cycle of the originating jurisdiction (Fawcett and Marsh 2012).

Conclusion

This paper set out to examine the value that derives for agencies involved in policy transfer and whether there is more at play in policy transfer than simply a rational analysis of finding out how to do things better from others. The analysis of the two cases has highlighted that there exist underlying features essential to the success of voluntary policy transfer. In particular it points to the fundamental importance of collaborative interpersonal relationships in policy transfer activity. Here we note that people and the way they construct and build relations becomes an underlying feature of the policy transfer architecture. Policy is so much connected to the governing of society, and so, it is not surprising that people who have roles in structuring the governing of our world then become critical agents in shaping how that might occur with the benefit of drawing on the learned experience of others. These relationships comprise a willingness and openness to share lessons and knowledge between jurisdictions, and in this way act to sustain the transfer process. And while these relationships are essentially formed around a shared interest in a common policy problem they play a key role in connecting the ideas and experience of one place to the decision-making structures of another. Here we see relations (perhaps structured through formal mechanisms of communications, international research trips and site visits) connect with formal policy mechanisms that explore how shared core policy objectives might be progressed. A major benefit that results from this collaborative engagement is the increase in analytical focus on a shared problem. As jurisdictions combine their analytical effort, share knowledge and experience around a problem the intellectual potential for devising options and solutions is increased. In a scenario where government expenditure on such tasks is tightening, this highlights the increasing benefit that derives from being engaged in policy transfer. In an

increasingly globalised world, the possibility for jurisdictions in different geographic locations to share information, policy ideas and insights and to work together to resolve common policy problems grows. The only break on this process is the willingness of policy workers to build cooperative relations. In this context the interpersonal becomes critical to the success of the technical. The analysis of the Swedish and South African case studies suggests that regardless of the extent of formality designed (or not) into processes of interaction, collaborative relationships between actors is a significant factor in determining the success of voluntary policy transfer.

The analysis shows that the nature of the formality and structure of the transfer process also impacts upon how local policy making processes will engage with the project. For example, in the Swedish IAP case the formal nature of the three year trial and involvement of the steering committee meant that the critique and reflection by local stakeholders effectively opened channels on how to translate the IAP into local operation. In the South African case the casual nature of the policy transfer process meant that ideas and technical information could be more freely modified and reformed to suit the local context. Again, a spirit of openness in the collaborative relationships facilitated this less structured and result-focused form of interjurisdictional policy transfer. This comparative study shows that as public sector agencies seek to improve their efficiency and impact on policy problems policy transfer appears a form of work that is of increasing value.

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