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Policy Transfer and Diffusion:
Looking at Policy Features and the Policy Process

Title of the paper

Explaining the dynamics and outcomes of policy transfer – development and testing of an integrative framework

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Abstract

Although studies on policy transfer have expanded, a general and comprehensive understanding of policy transfer is lacking. This study offers an evidence-based explanation of policy transfer processes. We extracted constraining and facilitating factors from 180 empirical studies using PRISMA (Preferred Reporting Items for Systematic reviews and Meta-Analysis) and aggregated these factors into a conceptual framework. We synthesize our findings in four 'transfer routes'. We conclude that actors could shape a subset of those factors by taking certain decisions regarding transferability, adoptability and process design, albeit within the boundaries of the environment.

Keywords: policy transfer; policy diffusion; policy mobility; PRISMA; factors

Introduction

Over the past decades, the body of literature on policy convergence has expanded and policies are believed to be increasingly spreading nowadays. Globalization, increasing various interdependencies and spill-over effects, and the widespread use of modern information and communication means (such as the Internet) are frequently cited as enablers of this spreading (Dolowitz, 2006) because these developments enhance access to knowledge about policies from elsewhere. Concurrently, the popularity of evidence-based policy making, favouring the adoption of policies that have proven to be effective

elsewhere (Legrand, 2012), increases policy convergence. In addition, policy makers might opt to adopt policies from elsewhere that are perceived successful at their origin to justify a policy change (Marsden & Stead, 2011).

Although the above illustrates that a growing body of literature acknowledges the importance of transferred policies in present-day policy making processes, studies onto this phenomenon are dispersed. As a consequence, general and comprehensive understanding of the process of policy transfer is still lacking. The past decades, several reviews have been conducted on policy transfer but none of them systematically documented the factors that influence the policy transfer process and thereby the outcomes of this process. Some early reviews focused on understanding policy transfer (e.g. Bennett, 1991; Dolowitz and Marsh, 1996). More recent contributions aimed to describe the conceptual refinements (Benson and Jordan, 2011), innovations in the field (e.g. Peck & Theodore, 2010; Stone, 2012; Temenos & McCann, 2012) or re-assess influential contributions to the literature (Stone, 2016). Although these reviews provides a clear overview of (conceptual) evolution in the field of policy transfer, they do not provide an overall explanation of policy transfer processes and outcomes.

Additionally, most studies are case studies, thus limiting the generalisability of their findings. Furthermore, studies are usually deductive in nature: authors develop a theoretical framework and test it in a case study or employ an existing framework in a different environment. This paper will add to this knowledge, by identifying and aggregating factors that were empirically identified to influence policy transfer processes. By focussing on empirical research rather than new conceptualizations, we will be able to answer the question why some mobilized policies are adopted and successfully implemented, while others are not.

The limited attention to explanatory factors is surprising given the crucial role that these factors play in explaining the success of policy transfer (Marsh & Sharman 2009). In subsequent phases of the policy transfer process different factors play a role, as some authors identified (e.g. Kerlin, 2009; Gullberg & Bang, 2015). Moreover certain factors become decisive during specific phases of a transfer process (Natasha Borges Sugiyama, 2016). Stone (2016) noted that some of these causes of failure or success are recurrent, such as the role of context in transferability, the role of actors to improve or complicate the policy transfer process and the role of learning to establish the transfer of knowledge. Additionally most studies are case studies, thus limiting the generalisability of their findings. Furthermore, studies are usually deductive in nature: authors develop a theoretical framework and test it in a case study or employ an existing framework in a different environment.

We aim to contribute to a more evidence-based framework of policy transfer, by conducting a systematic review. This resulting explanatory framework can serve as a reference point for scientists studying policy transfer processes. As policy transfer processes require extensive resources, such as time, money and human resources, the framework can also help identify challenges in policy transfer that can be used to enhance the efficiency and effectiveness transferring policies, thus reducing the risk of inappropriate, incomplete or uninformed transfers (Dolowitz & Marsh, 2000).

Several terms are used to refer to processes of policy spreading, such as policy transfer, policy diffusion and policy mobility (Prince, 2012; Stone, 2001) and policy adaptation and policy translation (Mukhtarov, 2014). Such terms have overlapping meaning but nuances can be found in their approach to convergence (Marsh & Sharman, 2009). In this article we are interested in the "action oriented intentional activity" (Evans & Davies, 1999) of spreading a policy and the use of "knowledge about

policies, administrative arrangements, institutions, etc. in one time and/or place" to develop policies in another time or place (D. Dolowitz & Marsh, 1996, p. 344). Furthermore, we consider policy transfer to take place between autonomous actors that can make sovereign decisions. According to this definition, policy transfer does not include adoption of mandatory EU legislation in EU-member states but can include voluntary or coerced adoption of international standards. Several bodies of literature have addressed the coercive imposition of standards on other, mainly developing countries, such as literature on institutional transformation and studies on conditionality, including the structural adjustments policy of the World Bank (Stone, 2016). Although we acknowledge the existence and potential relevance of these studies, we will limit this review to intentional adoption or non-adoption of policy by autonomous policy actors, originating from the policy transfer, diffusion and mobility literature.

The remainder of this paper consists of three sections. In section 2, we outline our application of the PRISMA method to systematically review the literature on factors that influence policy transfer. Accordingly, we wish to provide a comprehensive overview of factors that affect the process of policy transfer and, based on these factors, connect internal and external influences on policy transfer processes. We present all identified factors in section 3 by introducing a conceptual framework on policy transfer and discussing each factor's individual contribution to transfer. The main added value of this review lies in the subsequent deduction of policy transfer routes. In the discussion (section 4), we present four common routes that policy transfer processes can take from initiation to outcome. Finally, we conclude that factors early in the process may predetermine later transfer outcomes.

Method

This article aims to provide an overview of empirical studies since 1996, when Dolowitz and Marsh's seminal article was published, and therefore a systematic literature review is performed. This article makes use of the PRISMA method, an abbreviation of Preferred Reporting Items for Systematic reviews and Meta-Analysis (see Shamseer et al., 2015). In this section we will elaborate on our application of this method, for a detailed explanation of this method please consult Shamseer et al. (2015).

Search strategy

We used the search terms *policy transfer, policy diffusion* and *policy mobility* to systematically review the literature. In the introduction various alternatives to the term policy transfer were introduced, being policy diffusion, policy mobility, policy translation, policy convergence and policy adaptation. These terms are often used interchangeably (Stone 2001). However, the definitions of these six terms carry important nuances that increase or decrease the relevance of terms for our study. We compared definitions and randomly sampled twenty items per search term to evaluate whether this search term contributes to our cause. *Policy translation* mainly co-occurs with policy transfer. The remaining unique items address translation of research findings into policy or translation of policy decisions at a higher administrative level to a lower, executing administrative level. The search term *policy adaptation* returned much noise as most items addressed policy regarding climate change adaptation. *Policy convergence* is *"the tendency of societies to grow more alike, to develop similarities in structures, processes, and performances"* (Kerr 1983, p. 3) and lacks the intentional and action-oriented nature of policy transfer. Also, policy convergence focusses on results, rather than the processes that are central in policy transfer. As a result, policy

translation, policy convergence and policy adaptation were excluded as search terms.

We applied four search strategies. First, we performed an electronic search in two online databases: Scopus and Web of Knowledge. We limited the searches to peer-reviewed articles only, to ensure a certain level of quality of included items. Only English-language articles were included. Dolowitz and Marsh's seminal article (1996) unarguably has been influential (Benson & Jordan, 2011) and is therefore taken as a starting point for this review. Studies from 1996 up to and including 2016 were thus included. Second, we entered the search terms in the databases of eight journals with a non-Anglophone geographic focus to compensate for a domination of items from the UK, USA and Western Europe in the search results. This domination was potentially caused by the decision to include English-language articles only. We selected the journals that focus on Latin America, Africa, Asia and Eastern Europe and that occurred most frequently in the list of journals returned by the database search. The latter criteria was introduced in order to ensure the journal had published about policy transfer. Third, relevant books and book chapters were identified using the electronic databases Web of Science and Scopus. Finally, we asked experts in the fields of policy transfer, diffusion and mobility to examine our references and whether they missed any item. Three experts suggested a total of 56 novel items. Figure 1 summarizes the four search strategies and presents the number of books and peer reviewed articles that were identified with each strategy.

The relevance of identified items was assessed using a list of five eligibility criteria. The first criterion is that only empirical findings are eligible for inclusion, given our goal to develop an evidence-based account of factors that affect policy transfer. The second criterion is that items should discuss agenda setting or policy formulation phases. Implementation or effect evaluation of transferred policies are out of scope.

With similar reasoning we exclude implementation, spreading or enforcement at lower government levels (e.g. local level) of policy issued by higher levels of government (e.g. federation or union). The third criterion is that a study should identify factors as independent variables. This review serves to identify factors that influence the policy transfer process, hence policy transfer is considered the dependent variable in this review. The review is thus limited to articles that investigate independent variables (i.e. the factors that explain policy transfer). The fourth criterion is that the transfer should be taking place or should have taken place, excluding studies on transferability (i.e. export) and suitability (i.e. import) potential of policy. Finally, the studied transfer should be the result of an intentional process. An unintentional policy transfer includes the convergence of policies following changed global policy paradigms.

Item assessment

The resulting items were assessed in a two-step approach. Firstly, we assessed titles and abstracts and excluded items that did not meet the eligibility criteria. Items were always included in case of doubt. Items that passed this first stage were subjected to a full text read. A total of 78 publications ultimately failed a criteria and was rejected in this final stage after all. Figure 1 presents the flow chart of item selection.

Data analysis

All items were inductively coded and the final codes are the result of an iterative process of coding and re-coding in Atlas.ti software. We used a coding process that combined elements of selective and axial coding (Boeije, 2010). A set of codes was pre-determined following Benson and Jordan (2011), identifying the policy (i.e. transfer object), type of actors, the mechanism of transfer (voluntary, conditional or coercive)

and the outcome (non-adoption, imitation, adaptation or inspiration). We also collected data about the study itself: the number of transfers studied, the methods used, the country of the first author's institute and of the origin and destination of the transferred policy. For the coding of factors we used an open coding approach, basing the initial codes on formulations of the item's authors. In other words: factors that are included in the framework are not included because *we* found them relevant, but because they were identified by other authors in their studies. A phrase like "A lack of financial factors obstructed the transfer process." would thus receive the code "constraining effect" alongside the original code "Lack of financial resources" which was later aggregated into "Adoptability: resources". In subsequent iterative rounds the original factor-codes were divided, aggregated or renamed.

The results section is primarily based on the analysis of these codes. We present both a quantitative description of the data analysis (section R1) and an explanation of policy transfer success of failure in the form of a conceptual framework (sections R2 and R3).

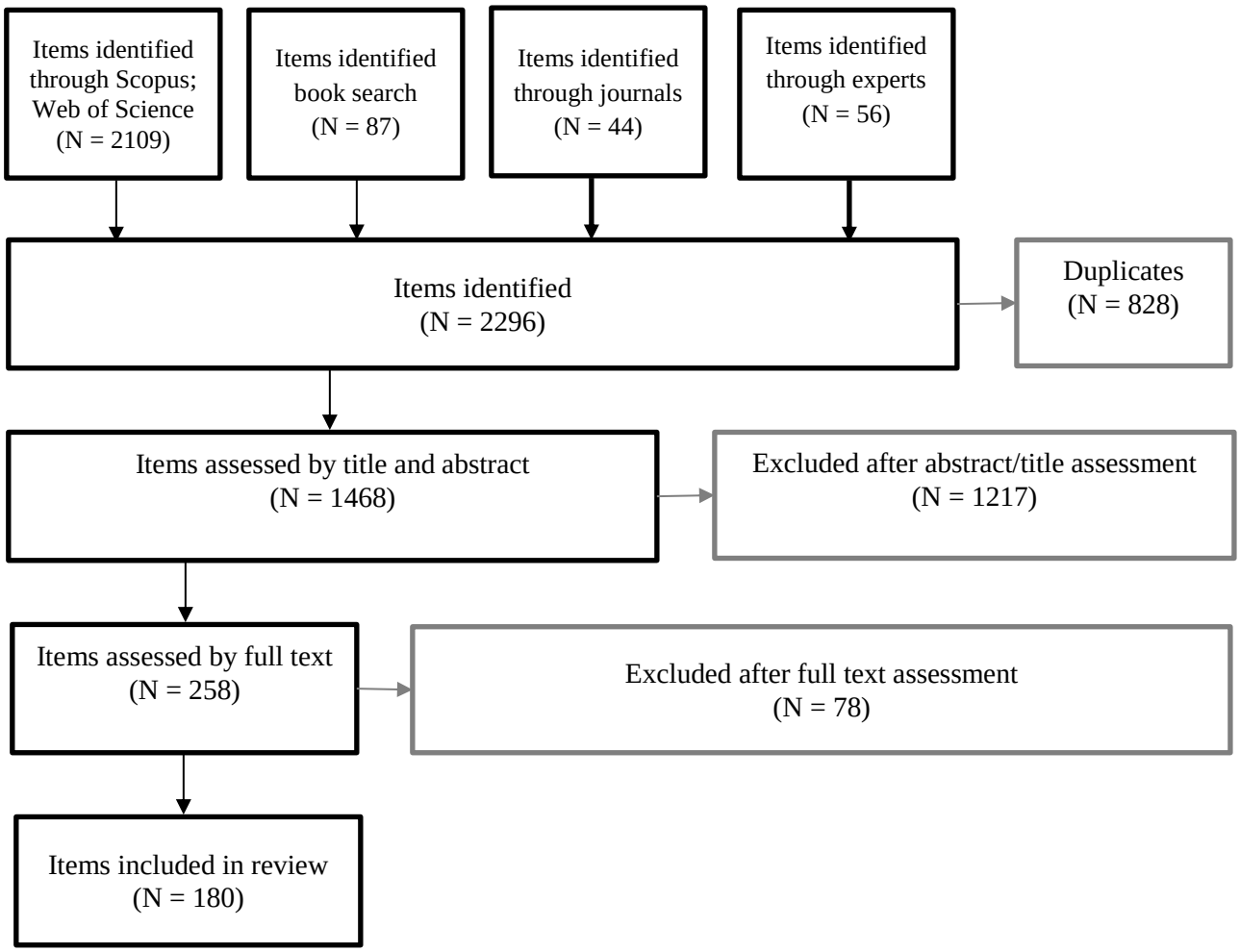

Figure 1 – Flowchart from initial searches to items included in the PRISMA-based literature review.

Results: overview of presented factors and towards a conceptual framework

After presenting general results in section 3.1, we move to the presentation and integration of factors into a conceptual framework in section 3.2

Describing the research focus of included items

A total of 180 articles is included in the review, see Appendix A for all references. These articles originate from 124 different journals. Although journals from diverse fields of research are included, such as *Urban Studies* (4 times), most frequently-cited journals relate to policy analysis. These other journals are *Policy studies* (8 times), *The Policy Studies Journal* (5), *Journal of European Public Policy* (5), *Governance* (4), *Public Administration and Development* (4), *Journal of Communist Studies and Transition Politics* (4) and *Journal of Comparative Policy Analysis: Research and Practice* (4).

The included items are dominated by policy transfer research in Western countries with Anglophone countries as its centre of gravity. A vast majority of the studies was conducted by first authors affiliated in Anglophone countries, headed by the UK (26%, N=180), USA (21%), Canada (9%) and Australia (6%), and in Western-European countries such as the Netherlands (5%) and Germany (6%). Moreover, the empirical studies included in the review focus on transfer from, to and between these countries as well. The UK and USA are studied most often, both as source and as destination of a transferred policy.

According to Benson and Jordan (2011) the field of policy transfer research diverged from its initial focus on transfer between nation states. Although such a diversion is observable on a conceptual level, only a small proportion of actual empirical studies involves non-state actors. 173 items discuss at least one state actor,

while only 34 discuss one or multiple non-state actors (such as researchers, consultants or NGOs). State actors are generally national governments or international governmental organisations (IGOs, such as the OECD, EU or World Bank) in policy diffusion and transfer studies. Policy mobility literature added studies on transfer between local governments. The results further suggest that national governments are generally senders, receivers and initiators of transfer processes. They are rarely facilitators or transfer agents, while IGOs primarily act as senders and facilitators rather than receivers of policy.

The included items most often consist of in-depth analysis of policy transfer. Most authors study a specific instance of policy transfer (80%, N=180), although 20% of the articles compares multiple different transfer activities. The vast majority of studies is qualitative in nature, using interviews (57%), observations (15%) and document analysis (9%) as most reported research instruments. However, roughly one in four articles does not report on the methods used. Similarly, only 73% of the articles defines how the research is structured in terms of a theoretical framework, model or concepts. One-third of the articles that specify their theoretical basis develop or test a new theoretical framework, while most built on existing concepts. There are even 11 studies that do not mention neither their methods for data collection nor the theoretical underpinnings of their analysis.

Towards a conceptual model of policy transfer

The previous paragraphs described the results of the selective coding process. As described in section 2, axial coding of factors was based on the original authors' description of a factor and whether this factor had a facilitating or constraining effect.

We aggregated factors into four groups (see Table 1) and used those as building blocks for a simple conceptual framework, see Figure 2. *Environmental factors* create the context that delimitates the playing field for factors of the other building blocks, namely *Transferability, Process Design* and *Adoptability*. This arrow from left to right represents (causal) influences of the building blocks on the outcome of transfer and not necessarily time. In the following section we will discuss in-depth the building blocks of this model and the associated factors.

Table 1 – Factor groups and their occurrence. The second column describes the total times factors in this building block were identified. As a single item can mention several factors in the same building block we added the last column showing the number of articles that mention at least one factor in a building block.

Building block	**Total times mentioned**	**Number and percentage of items mentioning this (N=180)**
Environment	86	61 (34%)
Transferability	156	67 (37%)
Adoptability	170	102 (57%)
Process design	171	110 (61%)
Total	*583*	

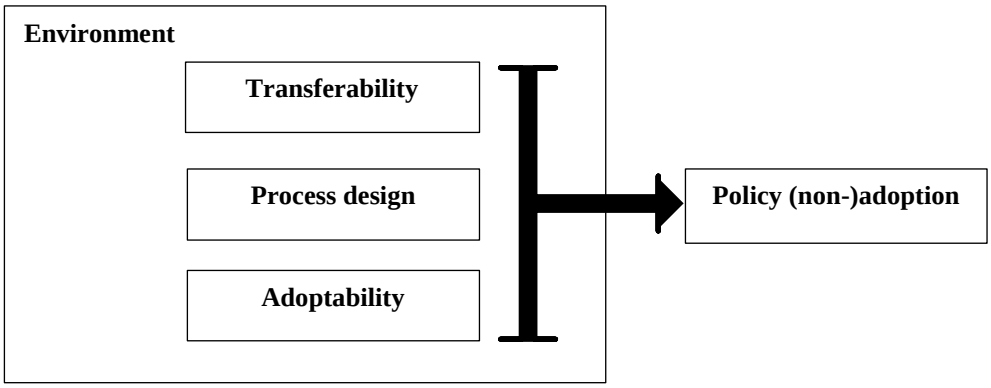

Figure 2 – Simple conceptual framework of policy transfer.

Environmental factors

The first building block concerns environmental factors. As discussed in the introduction, factors can be present in various phases of the transfer process. The environmental factors play a role in all phases. We distinguish between the *policy arena*, the *subsystem* and the *general context.* See Table 2.

Table 2 – Occurrence of factors related to environment.

Factor	Total times mentioned	Number and percentage of items mentioning this (N=180)
Policy arena	44	42 (23%)
Subsystem	26	23 (13%)
General context	16	14 (8%)

The *policy arena* consists of the factors that directly shape the freedom of movement of the key actors. This includes the Zeitgeist, existence or absence of competition with peers and the political climate (i.e. who forms the government). A policy might be at the right place at the right time (e.g. Cook & Ward, 2012) or make use of a policy winding due to right timing (e.g. Busch, 2005). A change of government can change the policy arena in favourable ways and open up a transfer process (e.g. Delpeuch & Vassileva, 2016), but may suddenly terminate nearly-completed transfers as well (e.g. Dussauge-Laguna, 2012).

The *subsystem* relates to the availability of alternative policies and the institutional and political context. Policy transfer can provide an alternative to a destination actor, for example in Eastern Europe EU's renewable energy policies provided an alternative to existing policies relying on Russian gas (Ademmer, 2015). However, a transfer process may be disturbed by the availability of alternative policies to the transferred policy (e.g. in the case of competing health policies, see Clarke, 2013)

or flourish in the absence of competing policies (e.g. in the case of IWRM, see Allouche, 2016).

The *general context* sets the boundary conditions for the policy transfer actors and is formed by the bio-physical (e.g. Attard & Enoch, 2011), cultural (e.g. Tsakatika, 2012) and socio-economic (e.g. Edwards & Beech, 2016) conditions. For example, the British and Australian Labour parties operated in similar neo-liberal systems but economic adversity required British Labour to adopt a dramatically different political position (Edwards & Beech, 2016).

Transferability

The second building block of the framework addresses the *transferability* of policy. We identified several factors in the review data that relate to the transferability of the transfer object. Transferability-related factors dominate early stages of the transfer process, corresponding to the exploration phase. See Table 3.

Table 3 – Percentage of studies that mention factors related to transferability.

Factor group	**Total times mentioned**	**Items mentioning this factor (N=180)**	
Conveying ability	22	21	(12%)
Actor relations	25	22	(12%)
Tolerance: Receptivity	10	10	(6%)
Tolerance: Decision making power	17	13	(7%)
Normative fit	40	35	(19%)
Policy features: Characteristics	7	7	(4%)
Policy features: Reputation	35	32	(18%)

A first factor of transferability is the *ability of the source actor to convey policies*. The source actor can have a positive image (e.g. Khirfan & Jaffer) or a less positive one (Bok, 2014), resulting in respectively stimulating and discouraging adoption of policies from this actor. Closely connected to a source actor's reputation is its legitimacy to transfer. Authors especially reported legitimacy issues faced by the EU in policy transfer to neighbouring countries outside the Union (Onursal-Beşgül, 2016; Radaelli, 2000; Vezirgiannidou, 2015; Xheneti & Kitching, 2011). However, Ademmer and Börzel (2013) provide an alternative explanation, namely that the high compliance costs of adopting EU-policies may outweigh the benefits for non-EU countries such as Turkey.

Transfer processes are more easily established when there are existing relations between source, adopting and third party actors. Such contacts increase the acquaintance with policies elsewhere through membership of an international organisations such as the EU or OECD (e.g. Ayoub, 2014; Oanc, 2015) and policy networks (Sloam, 2005), through colonial history (Smith et al., 2002) or through trade and cooperation relations (Jinnah & Lindsay, 2016; Randma-Liiv & Kruusenberg, 2012).

Transferability is further determined by the *tolerance* of the adopting actor. This ability is determined by the receptivity and decision making power of this actor. *Receptivity* denotes the openness of the receiving actor to consider policies from elsewhere. A lack of openness limits the potential for transfer from the start (e.g. Dolowitz & Medearis, 2009; Keating & Cairney, 2012). Openness is necessary but not sufficient, as actors may lack *decision making power*. Adopting actors can be dependent on other states or donors (e.g. Ohemeng, 2010). Such dependency reduces their sovereignty and can benefit (coercive) policy transfer within or limit transfer to parties

outside the spheres of influence (Ademmer, 2014). Vezirgiannidou (2015) further demonstrated that actors able to make sovereign decisions are less vulnerable to external pressures.

Finally, *policy features* and *normative fit* determine transferability. Flexibility (Kerlin, 2009; Lavenex, 2014) and low context-dependency (de Jong & Bao, 2007; de Loë et al., 2016) of policies increases the range of possible applications. Especially infrastructure policies may be tailored to specific biophysical conditions, reducing their transferability (Attard & Enoch, 2011; Michaels & de Loë, 2010). On the contrary, transferability increases when the policy matches the values (e.g. Chapman & Greenaway, 2006) and political objectives of the receiving actor (e.g. Clavier, 2010). Then again, policies with a reputation of proven effectiveness and success are popular transfer objects for policy makers because such policies are justified by their (perceived) success (e.g. Metz & Fischer, 2016; Ovodenko & Keohane, 2012).

Process design

The third building block concerns the interaction between transfer actors, shaped by a particular *process design.* Process design plays a role in both the process towards policy exchange and in adopting and implementing the transfer object.

Table 4 – Occurrence of factors related to transfer process design.

Factor group	Total times mentioned	Items mentioning this factor (N=180)	
Mutual adaptation	28	25	(14%)
Management and network	34	31	(17%)
Transfer type: Exchange	23	20	(11%)
Transfer type: Level of	17	16	(9%)
Actors: Key actors	39	37	(21%)
Actors: Coalition building	30	28	(16%)

External relations in the form of *building coalitions* and engaging all *key actors* are essential in the process design. Policy consensus enhances the ultimate success of a transferred policy, whether this support is built around a broad coalition of domestic stakeholders (e.g. Müller & Slominski, 2015) or external support e (e.g. de Loe, Murray, Michaels, & Plummer, 2016). An adopted policy can fail in the final implementation phase as well, because support from executive officials was not secured earlier phases (Šimić Banović, 2015). Key players, such as policy entrepreneurs and political leadership, can control this transfer process. This leadership can follow from existing leaders' characteristics such as charisma (e.g. Ohemeng, 2010) or be managed through strategic human resource management. An example of such strategic management is the employment of experienced West-German policy officials in East-

Germany after the latter adopted West-German institutions after reunification in the nineties (Welsh, 2010).

In the previous section we introduced the need of openness to external policies by the adopting actor. While exchanging knowledge, actors engaged in the process need to be open to *mutual understanding of and adaptation* to values, practices and beliefs of the other actors. Transfer agents should look for both similarities and differences (Hoyt, 2006, p. 238). Insufficient adaptation of policies to the local context may result in inappropriate policy transfer. De Jong and Bao (2007) argue that mutual understanding of cultural differences is in fact more important than having a similar culture. This understanding can be achieved by two-way instead of one-way communication as Park, Chung and Wilding (2016; Park, Wilding, & Chung, 2014) demonstrated. Language is an important factor in (preventing) miscommunication (Fawcett & Marsh, 2012; Xheneti & Kitching, 2011; Welsh, 2010). The role of language is disputed though, as Stadelmann and Castro found no positive influence of having the same language on climate policy diffusion in a large-N study (Stadelmann & Castro, 2014).
Clarity about the *management and network* is important (D. P. Dolowitz & Medearis, 2009; Timms, 2011), but studies differs on whether hierarchy (Wunderlich, 2012) or a flat organisational structure with high autonomy for transfer agents (Khirfan & Jaffer, 2014) is more beneficial. However, the importance of having a dense policy network with informal relations is stressed in several studies (e.g. Chien and Ho, 2011).

Regardless of how formal the exchange process is organised, the process evolves in a certain *transfer type*. Following existing typologies (Goldfinch & Roberts, 2013; Rose, 1991) we distinguish between imitation, adaptation and inspiration. Imitation (also referred to as copying, mimicking or harmonisation) is considered a 'quick fix' for policy makers in urgent need of a solution and is associated with several

forms of failed transfer (Crot, 2010; Toens & Landwehr, 2009). Adaptation refers to the incorporation of the basic model with changes and includes emulation along with the more recent terms of translation and assemblage. Bulmer and Padgett (2005) suggest that bargaining results in transfer that are the synthesis of several policies and rely less strongly on one source. Inspiration results in the creation of new policies that are based on (elements of) policies from elsewhere, such as the "hybrid system created that drew on US and Australian examples for inspiration and copied selected aspects of policies and statutes." (Michaels & de Loë, 2010, p. 501). Learning is often associated with successful transfers (e.g. Biesenbender & Tosun, 2014). Additionally, we include negative lessons in the category of 'other' adoption models. Negative lessons as outcome refer to the decision to seek alternatives as a result of limited success of the originally considered policy.

Finally, the *level of coercion* has an influence on the policy transfer process. External pressures can enhance the acceptance of certain policy norms by other countries, for example when these norms are part of a trade agreement (Jinnah & Lindsay, 2016), but may initiate transfers that are inappropriate for the objectives of the adopter (Parnini, 2009) or transfers that are not completed (Webber, 2015).Conditional transfers are formally voluntary but practically the result of external pressure. An example concerns the conditional loans from the World Bank (Larmour, 2002). We will discuss the relation between the level of coercion, the exchange mechanism and the adoption or non-adoption of the transferred policy in the subsection 'Policy (non-)adoption'.

Adoptability

The final building block is *adoptability,* and Table 5 presents its factors. Adoptability factors usually play a role during later phases of the policy making process.

Table 5 – Occurrence of factors related to adoptability.

Factor group	Total times mentioned	Items mentioning this factor (N=180)	
Suitability: Institutional fit	47	37	(21%)
Suitability: Flexibility of policy	11	11	(6%)
Capacity: Policy evaluation	18	17	(9%)
Capacity: Expertise	27	26	(14%)
Ability to change policy course	38	34	(9%)
Resources	29	28	(16%)

In the first building block we introduced the normative fit of a policy as part of its transferability. Besides this normative fit the *institutional fit* plays an important role as well. A transfer object is adopted in a certain institutional context. If certain pre-requisites are met a smooth policy integration may be possible. For example, transfer of educational norms an reforms from the EU to Turkey was possible due to the America-based model of higher education in Turkey (Onursal-Beşgül, 2016). When actors fail to meet these pre-requisites, implementation failure is inevitable, as was the case in transfer to India of industry reforms due to the unforeseen lack of a regulatory agency in India (Xu, 2005). The *flexibility of a policy* can reduce the mismatch to a certain degree. Policies with a fixed core but high flexibility in implementation will be adopted easier at destinations with a reduced normative or institutional fit (Kerlin, 2009). Moreover, simple or simplified policies will require less organisational capacity and are therefore less prone to failure in this phase (Lepinard, 2016).

This organisational capacity consist of the *expertise* to search and implement external policies and the organisational capacity to *evaluate policies*. Extensive policy evaluation will ensure that policy learning takes place and that only policy with a good fit is transferred (Fawcett & Marsh, 2012). Such evaluation also enables negative lesson drawing (Timms, 2011). An important requirement is that destination actors are sufficiently equipped to organise the process of searching and implementing external policies (Randma-Liiv & Kruusenberg, 2012). Such organisation "requires significant commitment by politicians and, especially, public servants to investigating its operation (…") (Fawcett & Marsh, 2012, p. 184).

Sufficient *resources* are needed to adopt and integrate a transferred policy. Such resources could be time and human and financial resources. These resources are required in all phases. However, a lack of resources is often mentioned to cause failure in the adoption phase, especially lack of time and financial resources (e.g. Marsden, Frick, May, & Deakin, 2012).

Even with sufficient organisational capacity and favourable policy characteristics, the adopting actor should be able to *change the policy course*. Previously made policy decisions create path dependency. Path dependency can be beneficial to the transfer (e.g. Gullberg & Bang, 2015) or abort the transfer at any time due to inability to change the policy course (e.g. Zhang, 2012). In the final phases of the transfer a lack of support from decision makers might be catastrophic. This lack may not have hampered the transfer process itself, but restricts the outcome of policy transfer. An example is the fruitful exchange of ideas between Dutch and Japanese train operators where the Japanese decision makers had decided on a different policy before the transfer was even completed (van de Velde, 2013b). Involving or ensuring access to decision makers early in the process facilitates the process (Kerlin, 2009).

Policy non-adoption

The final element of our model concerns the outcome of the policy transfer process in terms of adoption or non-adoption. This outcome is divided into successful, formal and unsuccessful policy transfer. Successful transfer refers to a completed transfer process where the receiving policy maker adopted the policy. Ultimately, successful transfers achieve political goals as well. Unsuccessful refers to transfers that were considered but never initiated or that were initiated but aborted along the way. Formal policy transfer finally refers to policy transfer where the policy was formally adopted but was not implemented or enforced. As could be seen in tables 6 and 7 most included articles describe cases of successful policy transfer and the majority of review items concerns more voluntary transfer. Table 7 further shows that mechanisms with more evaluation and translation less often result in unsuccessful or formal transfer.

There are two explanations for this majority of successful and voluntary transfers in the studies. The first explanation is that such cases receive more attention, making them more feasible as study object and therefore create overrepresentation of such cases in empirical studies.

A second explanation could be that voluntary transfers are more likely to result in successful adoption. Our data supports previous claims (e.g. Ogden et al., 2003) that coercive or conditional transfers are more likely to result in unsuccessful or formal transfer than voluntary transfers. Webber (2015) even draws a direct relation between the coercive nature of the transfer and the resulting incomplete transfer. An explanation is that the receiving actor is merely interested in complying with the conditions for other purposes, rather than adopting policy out of genuine interest. However, especially in developing countries a lack of compliance might be the result of lacking infrastructure to implement a certain policy, rather than lacking the willingness (Bennett et al., 2015).

Another similar trend can be observed for the transfer type, see tables 6 and 7. Imitation and adaptation are most commonly studied, but imitation results more often in non-adoption when compared to adaptation and inspiration.

Table 6 – Outcomes of policy transfer cases by force of initiation.

Force of initiation	***Total N***	**Successful**	**Unsuccessful**	**Formal**
Coercive	*25 (16%)*	8%	4%	4%
Voluntary	*98 (55%)*	38%	12%	5%
Conditional/other	*17 (11%)*	6%	3%	2%
Undefined	*3 (2%)*			
Total	*143 (100%)*	*52%*	*18%*	*11%*

Table 7 – Outcomes of policy transfer cases by mechanism.

Mechanism	**Adoption**	**Non-adoption**	**Formal**	**Total N**
Imitation	60%	28%	12%	46 (100%)
Adaptation	73%	15%	13%	47 (100%)
Inspiration	76%	18%	6%	19 (100%)
Other	64%	29%	7%	28 (100%)

Applying the framework to policy transfer from the Netherlands to Indonesia

In May 2017 we performed a document analysis and held several interviews with policy makers, consultants and stakeholders in Jakarta, Indonesia. For each factor in the framework we assessed the transfer of water management policies from the Netherlands to Jakarta. We identified several constraining factors in the transfer process. During the International Conference on Public Policy in Singapore in June 2017, we will use this case as an illustration for our framework.

Discussion and conclusions

General remarks on the framework

To address the lack of an evidence-based explanation of policy transfer processes, we based our review of empirical studies on policy transfer. These studies were dominated by Anglophone transfers and usually conducted using interviews and document analysis to study one or multiple cases of policy transfer. These cases predominantly involved state actors rather than non-state actors and we observed a concentration of voluntary transfer that resulted in policy adoption. We identified four clusters of factors (*transferability*, *process design*, *adoptability*, *environmental factors)* that influence this *policy (non-)adoption*. Two results stand out. First, factors related to *process design* play a crucial role in policy transfer processes and the ultimate success or failure of such a process. Especially the selection of the *right actors*, both individuals and coalition-wise, plays a key role. Second, previous studies attribute considerable value to similarities or differences in context (e.g. Stone, 2016)). The review supports this claim, but also indicates that the *policy arena* is more often a decisive enabler or barrier for policy transfer. Related concepts such as *normative* and *institutional fit* are more important than the general context and so is *policy reputation.* These results suggest that the emphasis on context as explanation for policy transfer outcomes should be accompanied by actor selection, institutional and normative fit and the momentary political situation. More importantly, the involved actors can control these factors to a certain extent, in contrary to (general) context. Some factors are an important barrier when they are absent and a key facilitator when present, or vice versa. An example of such a factor is having sufficient *resources*. Control over such factors is important for those involved in policy transfer, and the insights of our model pave the way for

purposeful management of policy transfer processes.

We refrained from a phase-based model, but conclude that most factors in the transferability building block played key roles during earlier phases of the transfer, while factors related to adoptability became decisive during later phases. The temporal role of factors was suggested before (e.g. Kerlin, 2009; Gullberg & Bang, 2015) and this review systematically mapped them. This temporal element is interesting, because they may direct transfer agents' attention during, for example, agenda setting.

In summary, we can conclude that some factors are more important than other factors and that actors can control the nature of these factors to a certain extent. Furthermore, conditions at the early phases of policy transfer may eventually affect the final results in terms of transfer and adoption mechanisms. Coming research could further analyse the nature of the relation between and the relative importance of factors. Based on the insights form our conceptual framework, we will discuss four policy transfer routes that policy transfer can take from initial conditions to final outcomes.

Route varieties of policy transfer

The framework provides a comprehensive overview of factors that *other* authors have found, but this section reflects the deeper insights we gained by scrutinising their studies. When we combine the factors discussed in the framework with the policy transfer routes, we cannot neglect that the initial conditions of a policy transfer process influence the outcomes of that trajectory. These 'route varieties' include opportunistic, framed, conditional and learning policy transfer.

Opportunistic policy transfer is characterised by bounded searches, considering a single external policy that mainly serves to justify policy measures 'at home'. The adopting actor is usually the initiator of the transfer attempt. Political urgency to act can

trigger opportunistic transfer, of which the imminent threat of a financial crisis is an iconic example. These 'quick fixes' usually rely on imitation as exchange mechanism, as time is highly constraint and a limiting factor (O'Hara, 2008). Constraining factors are usually found in the process design building block, as the exchange is characterised by unidirectional flow of information accompanied by limited knowledge about key issues and poor policy evaluation. Opportunistic transfers might result in inappropriate or uninformed transfer. Adoptability seems to be a strength of opportunistic transfers, making use of environmental factors, but the process design limits its successes.

Marketed policy transfer is initiated after policy marketing or relies on existing (bilateral) relations between source and adopting actors. Such strategies enhance the occurrence of transfer, but these strategies are not without risk. Actors' reputation can be improved by lists of excellence, for example by city ranking on various policy topics or policy promotion. The source actor plays a dominant role and is likely to act as transfer agent to influence formal adoption. These transfers depend on imitation and limited adaptation. Such framing can enhance the perceived normative fit and fuel diffusion, although such marketed policies risk ending up as inappropriate transfer due to limited evaluation of the policy. Similarly, Astrid Wood (2015) warns that existing contacts can increase the transferability but not necessarily results in the most suitable policy. Transferability is artificially propelled and challenges are mainly encountered in the adoptability building block.

Conditional policy transfer ranges from transfer through peer-pressure (Cohen-Vogel & Ingle, 2007) to transfers based on limited sovereignty or full dependency of adopting actors. Conditional transfers often involve third party actors, such as international governmental organisations (IGOs). Such transfer benefit harmonisation and are a means for more powerful actors to influence decision making elsewhere.

These transfers risk inappropriate transfer and associations with neo-colonialist influences. Limited financial resources are mentioned several times as a major constrain and vice versa (e.g. Jinnah & Lindsay, 2016), thus suggesting that financial support might be more effective than imposing financial inducements to laggards. Transferability is enforced in conditional transfer and major challenges are found in the adoptability block, although elements of the process design play a distinct role as well.

Finally, a process of *mutual learning* may result in policy transfer. Learning transfers can be initiated by any actor, but decision making remains exclusive to the receiving actor. The search for policies is usually bounded and extensive policy evaluation or piloting is part of the process, resulting in well-considered decisions and broad support coalitions. As a consequence, this route requires considerable resources and is therefore not always attainable. A full learning process results in adaptation, inspiration or mutual influencing and is less vulnerable for incomplete or uninformed policy transfer. Learning can make conditional transfers successful, although a 'learning paradox' exist (Evans & Barakat, 2012; Toens & Landwehr, 2009). Unsuitable knowledge may be internalized, resulting in inappropriate transfer. Nonetheless, learning is generally associated with improved transfer because learning internalizes procedures of policy formation. The process design is the strength of learning transfer and requires attention throughout the exchange.

Limitations and a future research agenda

Our framework is largely based on successful, voluntary transfers. This skewness may be the result of the eligibility that excluded studies on implementation and enforcement of adopted policies, which may describe unsuccessful cases. This study could be extended by including articles that focus on these steps of the policy

cycle to increase our understanding of the relations between factors and outcome by sharpening the framework and routes that we introduced here.

The PRISMA method proved to be effective in identifying a wide range of factors described in existing studies. The prescribed selection procedure lead to the inclusion of articles that would have remained unnoticed with other (systematic) review methods. However, we acknowledge that there are other bodies of literature 'out there' that may address the same phenomenon but use different labels, such as literature on transformation of institutions (e.g. Goetz, 2011). The inclusion of non-English literature could further add to this review, as our results are now dominated by Anglophone studies.

During this review we noticed that the term *transfer mechanism* can refer to different phenomena: the model of reproduction (e.g. inspiration, Theobald & Kern, 2011), the voluntary or coercive nature of transfer (e.g. Keating and Cairney 2012), the mode of exchange (e.g. policy learning, see Nicholson-Crotty and Carley 2015) and the channels through which policies spread (e.g. Jazif-Munoz 2015). As described in the introduction, the same goes for the various terms for policy spreading. These terminological voids are problematic, especially given the continuous assimilation of policy transfer studies in other research fields (Benson & Jordan, 2011). A future conceptual contribution can build a common vocabulary.

Finally, actors engaged in transfer make decisions that results into distinct circumstances. These circumstances eventually induce various factors that line up for a certain trajectory. This study has indicated that several factors shape the circumstances of policy transfer and thereby leads transfer process to line up for certain policy routes. Thinking in terms of policy transfer routes highlights that there is a relation between the mechanisms of policy transfer, the type of adoption (mechanism) and the ultimate

policy success as well. Future studies can build on our framework and route varieties by further operationalization of factors and by establishing the added value of this framework in various case studies. Alternatively, research may focus on the ability to shift between policy transfer routes. The identified learning route further confirms the preference for 'policy translation' or 'learning' (e.g. Stone, 2001) over imitation and adaptation. A question that remains is how scientists and policy makers in practice can use these insights to actively anticipate these circumstances in a policy transfer process.

This study increases our understanding of how the process of policy transfer relates to success or failure and what constraints or facilitates these processes. We conclude that actors could shape some of the identified factors by taking certain decisions regarding transferability, adoptability and process design, albeit within the boundaries of the environment. Professionals may use these insights in managing transfer processes and forms a conceptual departing point to study how these processes can be steered more consciously.

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Appendix A – The 180 items included in the review[1]

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