

Internal Advisory Systems in Different Political-Administrative Regimes

**Exploring the Fit of Configuration, Administration and Composition of Internal Advisory
Systems in France, Germany, Sweden, The Netherlands and The United Kingdom**

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The Netherlands School of Public Administration

Dr. Martin Schulz (Schulz@nsob.nl)

Daphne Bressers MSc.

Dr. Martijn van der Steen

Prof. Dr. Mark van Twist

Abstract

Every country has an internal advisory system that fits the specific country's needs. Internal advisory systems therefore differ not only to the content of their advice, but also to the institutional setup of the system itself. In this paper we present and discuss an intensive desk study in which we explore the fit of institutional elements of internal advisory systems of France, Germany, The Netherlands, Sweden and the United Kingdom with the political-administrative regimes in which these internal systems are setup in. Based on empirical findings and existing academic literature (e.g. Halligan, 1995; Craft & Howlett, 1995; Fleischer, 2012) we identified institutional elements of advisory systems setups that show differences between these systems: configuration, administration and composition. In this paper we discuss that each country's internal advisory system fits into the specific administrative-advisory system. We also find that though the institutional setup of the internal system is different the underlying issues dealt with are the same. One is the attempt by governments to regulate internal advisory systems while at the same time emphasizing the independence of the advisory bodies within that internal system. The other is the apparent necessity to incorporate facts and knowledge into the decision making process while at the same time incorporating value and opinions strengthening the legitimacy of the policy. Different countries cope with these struggles differently resulting in different setups of internal administrative regimes.

1. Introduction: internal advisory systems

Halligan (1995) describes policy advisory systems as an interlocking set of actors, with a unique configuration in each sector and jurisdiction, who provide information, knowledge and recommendations for actions to policy-advice. Howlett & Migone (2013) argue that the policy advisory system '*transcends the boundaries of internal government expertise and knowledge activities*'. The advisory system is part of the total knowledge infrastructure for policy that comprises all flows of information and knowledge in a country (Craft & Howlett, 2013). It is concerned with a specific part of this knowledge infrastructure and focuses on the policy advice to government. The advisory system entails a large variety of bodies such as advisory councils, (ad hoc) advisory commissions, commissions of inquiry, foresight units, special advisors, innovation fora, 'what works centers', think tanks and universities and many other bodies, all of which provide knowledge and advice to government. Because of the abundance of different bodies in different countries advisory systems cannot be clearly constricted: they include all sources of advice that focus on giving information, knowledge and recommendations to government.

Halligan (1995) seeks for a model to understand policy advisory systems. He points out the different locations of advisory bodies towards government discussing three alternatives: inside the public service, internally located and externally located. Furthermore he points out that government control on the bodies located in these three positions differs. Some countries have a more internal focus, whereas others have a more external focus for obtaining their information and knowledge (Fleischer, 2012; Halligan, 1995).

	Government control	
Location	High	Low
Public service	Senior departmental policy advisors Central agency advisors/strategic policy unit	Statutory appointments in public service
Internal to government	Political advisory systems Temporary advisory policy units • Ministers offices • First ministers offices	Permanent advisory policy units Statutory authorities units
External	Parliaments (e.g. a House of Commons) Private sector/non-governmental organisations (NGOs) on contract Community organisations subject to government Federal international organizations	Legislatures (e.g. US Congress, Trade unions, interest groups) Community groups Confederal international communities/organisations

Table 1: Locational model of policy advice system (Source: Halligan, 1995)

This paper discusses that part of the advisory system that in terms of Halligan (1995) is located *internal to government*. Extensive research has been done to better understand advisory systems (Craft & Howlett, 2013; Fobé et al, 2013; Fleischer, 2012; Glynn et al, 2003; Howlett et al, 2015). The research shows important differences between countries regarding configurations of advisory bodies and their influence on public policy in these countries (Craft & Howlett, 2013). Comparative case studies mostly concentrate on an advisory arrangement in different political-administrative contexts and compare, for example specific types of bodies in different countries. There is very little comparative research on the *advisory systems as a whole in different political administrative contexts* (Glynn et al., 2003, Fleischer, 2012). For that reason this paper contributes to better understanding advisory systems by relating the institutional setup of internal advisory systems of five countries to the political-administrative regimes these systems are set up in. We therefore formulate the following question: *How can the institutional setup of an internal advisory system be understood within the political-administrative regime it is setup in?*

2. Comparing advisory systems' institutional setups

2.1. Institutional elements of advisory systems' setup

Literature shows three institutional elements of advisory systems' setup that we have used in this paper for further exploration: configuration, administration and composition. A brief overview is presented in table 2.

Element	Facets	Authors
Configuration	Size of the system Temporal orientation	Helmer & Scott, 1975; Cambell, 1986; Halligan, 1995; Jones & Storer, 2000; Müller & Walter, 2004; Tierman, 2006; Wilson, 2006; Prasser, 2006; Rouban, 2007; Craft & Howlett, 2013
Administration	Regulation Financing Obligation for government	Boston, 1994; Peters & Barker, 1993; Halligan, 1995; Siefken, 2007; Fobé et al, 2013; OECD, 2011b.
Composition	Member selection criterion	Berman, 1977; Judge, 1981; Elgie, 1991; Admo, 2002; Murswieck, 2006; Westerberg & Niemann, 2007; Green et al. 2009; Fleischer, 2012; Fobé et al., 2013

Table 2: overview of institutional elements

2.2. Configuration: size and temporal orientation

The configuration of advisory systems' setup is discussed in terms of both size (the number of bodies), and temporal orientation (permanent or temporary bodies). When it comes to size small advisory bodies have enhanced flexibility and support trustful relations with their clients (Müller & Walter, 2004). Larger bodies have more resources and therefore more importance for government (Tierman, 2006). Size is also an important element in advisory systems. A large advisory system provides

government with more advices and knowledge, but at the same time has the potential of a ‘battle for voice’ in which not all advice reaches government (Halligan, 1995). With regard to size the debate also focusses on the effect of size on fragmentation within the system (Helmer & Scott, 1975). Bigger advisory systems are assumed to increase their horizontal fragmentation resulting in international specialization and thus capacities to respond to the variety of policy requests (Rouban, 2007). Campell (1986) has argued that growing advisory arrangements lead to vertical fragmentation and the emergence of internal hierarchies.

When it comes to the temporal permanent councils are able to develop advice through time, building on changes in policy and society. Temporary bodies, like ad hoc commissions, are abrogated after finishing their task, so there is no long term development of knowledge and therefore no continued long term tradition in the advice. The configuration of an advisory system in terms of predominately permanent or temporary influences advice that stems from individual bodies. It is also argued that permanent advisory bodies’ role in the policy and decision making processes declines over time, due to its decreasing innovation capacity (Jones & Storer, 2000; Wilson, 2006). Blackstone & Plowden (1988) argue that advisory arrangements are most influential at their infancy: when as they argue the policy advice has an institutionalized and respected role in the policy and decision making processes. Still, the focus of the content in specific instances of providing advice to government may still be on ‘short term and reactive’ (hot) or ‘long-term/anticipatory’ (cold) advice regardless of the predominant temporal orientation of the advisory system as a whole (in terms of Prasser, 2006; Craft & Howlett, 2013).

2.3. *Administration: regulation, financing and obligations for government*

Governments administer advisory systems through regulation, financing and the obligations the system contains for government itself. As to regulation Fobé et al. (2013) state that some countries have a law or terms of reference that regulate the system. It determines the mandate of the advisory bodies within the system detailing their autonomy, the timeslot for the completion of advice and the possibilities for solicited and unsolicited advice. In addition, government can formulate explicit procedure for policy advice to enhance the transparency in the policy making process. Governments also choose to regulate advisory systems by restricting itself and mainly leaving room for advisory bodies within the system to regulate themselves (Siefken, 2007).

Advisory systems are financed in different ways. Within an advisory systems financing is not necessarily setup uniformly. Advisory bodies are financed differently, be it: entirely public, private or a mix of both. Some advisory bodies for example function as a corporation or a trade union in which the member of the union (partly) contribute to the finances of the advisory body. It is difficult to establish a value for money ratio for policy advisory systems. Boston (1994) points out that the

absence of a market and a precise measurement of the impact of the spending on policy advice of advisory bodies.

In addition, policy advice can bring about an obligation for government. In some advisory systems government has to respond to the given advice or is obligated to show how it is used in the policy domain. This to ensure government does not overlook its advisors. This obligation may exist on the level of the system as a whole but can also be found with regard to individual advisory bodies. In other countries no such obligation exists (Halligan, 1995; Fobé et al., 2013).

2.4. *Composition: how advisory systems are manned*

Different authors argue that the composition of advisory bodies is essential in the effect of the advice on the policy and decision making processes (Boston, 1984; Walter, 1986; Westerberg & Niemann, 2007). The head of the advisory body, the gender, age, educational and professional background matter (Westerberg & Niemann, 2007). The members of the advisory body are selected based on the criterion of their background. They are scientists, experts, professionals, representatives or civil servants or a mix of these groups (Fobé et al., 2013; Fleischer, 2012). There is an ongoing on whether civil servants should be included into advisory bodies in order to facilitate the relations with the ministry or should not be made members because of the value of the insights from outsiders to inject outside knowledge and working styles into policy making (Elgie, 1991; Murswieck, 2006; Fleischer, 2012).

A variety of members' educational and professional backgrounds positively influences the knowledge and expertise building in advisory arrangements (Judge, 1981), whereas others argue that a coherent composition of advisory arrangements improves the status and the support for the advice (Berman, 1977). Also, the legacy of the advisory body is relevant to their influence on the policy making process (Green et al., 2009; Fobé et al., 2013). Adamo (2002) asserts that a solid reputation to increasing validity, as well as attention by policy makers. Advisory bodies with a long ranging history have a more established reputation and therefor have more voice than bodies that have to establish themselves as an advisory body on a particular advisory domain (Fobé, 2013).

3. *Political-administrative regimes*

The importance of the political-administrative regime for the advisory system has been stressed extensively (Halligan, 1995; Craft & Howlett, 2015). Advisory systems fit into a political-administrative regime. In order to understand the advisory system, we have to understand the regime. For exploring the institutional setup of internal advisory systems we have selected five countries with different political-administrative regimes: France, Germany, The Netherlands, Sweden and The United

Kingdom that we considered for two distinct features: the state structure and the nature of the executive government.

The *state structure* consists of two dimensions (Pollitt & Bouckaert, 2011). The first dimension is the degree of vertical dispersion of authority – that is how far authority is shared between different levels of government. Along this dimension Pollitt and Bouckaert (2011) recognize three types of states: unitary and centralized states, unitary but decentralized states and federal states. Federal states mostly have a higher number of advisory bodies, because the bodies are located both on a federal and a local level (Halligan, 1995; Fobé, 2013). The second dimension concerns the degree of horizontal co-ordination at the central government level, that is how far all ministries together move into the same direction. This dimension ranges from ‘highly coordinated’ to ‘highly fragmented’. Though, many ministries concerned with different topics do necessarily lead to a higher number of advisory bodies. Policy domains such as health, education and social welfare, make up for the largest part of the budget for advisory bodies (Howlett & Wellstead, 2011).

The second feature we consider is the nature of the executive government. Different authors have described a useful typology to describe this *nature of the executive government* that consists of four types (Lijphart, 1984; Pollitt & Bouckaert, 2011). Single party or minimal-winning or bare majority (1): where one party holds more than 50 per cent of the seats in the legislative. Minimal-winning coalitions (2): where two or more parties hold more than 50 per cent of the legislative seats. Minority cabinets (3): where the party or parties composing the executive hold less than 50 per cent of the legislative seats. Oversized executives or grand coalitions (4): where additional parties are included in the executive board beyond the number required for a minimal winning coalition. Although the composition of the executive boards can vary in each election period, the electoral system in most countries produces fairly stable results. The nature of the executive government influences the advisory system. It can be argued that in majoritarian governments the need for advice is smaller than in a consensual model where parties have to look for shared solutions.

Lijphart (1984) distinguished two models along this line of arguments: the Westminster model of democracy and the Consensus model of democracy and their respective systems of policy making of pluralist and neocorporatist policy making. These different models influence the advisory system in a country. In a Westminster model there is a preference for the ‘speaking truth’ type of policy advising, although this shifts more towards a ‘sharing of influence’ or ‘sharing truth with multiple actors of influence’ that fades the strict distinction between ‘politics’ and ‘advice’ (Craft & Howlett, 2013). In Consensus models of democracy advisory bodies have a bigger role in the consensus builder, which has consequences for the composition of the advisory bodies. In countries with consensus models have a relatively large number of advisory bodies (Cawson, 1982; Lembruch & Schmitter, 1977). In

addition, it can be expected that policy makers in a consensus model have a preference in the involvement of stakeholders in the advisory councils (Fobé et al., 2013).

Country	France	Germany	Netherlands	Sweden	UK
State Structure	Unitary Formerly centralized Coordinated	Federal Coordinated	Unitary; Fairly fragmented	Unitary Decentralized	Unitary Centralized Coordinated
Executive Government	Intermediate	Intermediate	Consensual	Intermediate	Majoritarian (Westminster)

Table 3: types of politico-administrative regime: two features of public administration systems (Adapted from Pollitt & Bouckaert, 2011, p. 42).

4. Methods

The data collected and presented in this paper is the result of an intensive, exploratory desk study. First we identified elements of institutional setup and the facets they are composed of from academic literature. We were able to determine four elements with twenty-three composing facets (Van Twist et al, 2015). We also found that the internal advisory system is rarely an explicit part of country specific analysis in academic studies and that institutional setups of advisory systems are also rarely *empirically* studied. We then turned to country specific sources in order to collect specific information on the determined elements and facets of the institutional setup of advisory system. We have studied a wide array of official documents, laws, regulations, decrees and government websites to collect data. Being situated in The Netherlands ourselves we also requested embassies of The Netherlands in the selected countries and those countries embassies in The Netherlands to provide us with information on the elements and facets for the advisory system in their country. In addition and in order to correctly interpret findings we contacted several scientists in the countries studied who have been involved with studying particular advisory bodies or the advisory system as a whole in their country. They also provides us with information regarding the advisory system of their country. Finally and in order to verify our core findings we discussed them with the Public Governance Committee of OECD in April of 2015. Their notes, some of which came in writing after the committee meeting, were taken into account. This paper presents our findings from this exploratory desk study that concern the internal advisory systems in the five selected countries.

5. *Exploring internal advisory systems*

5.1 *Configuration*

France has a rather small and mostly politically oriented internal advisory system, due to the cabinets that support the president and the ministers. These cabinets are ad-hoc groups of advisors and staff that conduct all sorts of tasks such as providing juridical advice and practical support (Viorescu & Varela, 2008). From the existence of these cabinets follows that France has little ad hoc commissions. Also, France has relatively little advisory councils and committees that function outside of the executive branch of government (WRR, 2007). **Germany** on the other hand has a large internal advisory system (with around 400 advisory bodies) of which many advisory bodies exist for a long period of time (Krevert, 1993). Most of these advisory bodies are permanent advisory councils and less ad-hoc commissions (Thunert, 2000). External to government there also are many political think tanks (Stiftungen). The permanent advisory councils are mostly concerned with one policy domain, whereas the Stiftungen are concerned with a broad range of policy domains. The Stiftungen are installed to organize political reflections (politikberatung) and to provide countervailing power (gegengewichtsbildung). Almost all ministries on a federal level have their own advisory body (Thunert, 2000). Research shows that ministries with many advisory councils use less ad-hoc commissions than ministries with fewer advisory councils (Siefken, 2007). The **Netherlands** reformed its internal advisory system in 1997 with many permanent advisory bodies being terminated leaving only 26 in existence (Tweede kamer der Staten-Generaal, 2011). The Dutch internal advisory system has seen the use of many ad hoc commissions in the period after 1997 though its use seems to decline somewhat (Schulz, 2010; Tweede kamer der Staten-Generaal, 2011). **Sweden** has a substantial number of ad-hoc commissions, the so-called commissions of inquiry (called *Utredninga*) (Molander et al., 2002). These commissions are installed to reflect on the possible policy options in the beginning of each policy and decision making process. Sweden also has several permanent advisory bodies in the form of agency. These bodies are not linked to specific ministries, but offer advice on for example strategic foresight. The **United Kingdom** is organized according to the Westminster model in which government is understood to be assisted by a permanent high skilled civil service and in which only limited external support and advice is consulted. The United Kingdom reformed its internal advisory system in 2010 and formulated a new set of ‘principles of scientific advice to government’ (Doubledag & Wilsdon, 2013). In the United Kingdom the ministries are supposed to have in-house knowledge for technical and scientific advice. Each ministry has a Chief Scientific Advisor (CSA) and the central government has a Government Chief Scientific Advisor (GCSA). Advisory bodies function as non-departmental public bodies (NDPB), that can be divided into advisory committees, advisory councils, panels, review groups and working groups, or as a scientific advisory committee (SAC) (Cabinet Office, 2012). Only limited external parties are invited to give their advice (Government Office for Science, 2010).

5.2 Administration

France has a detailed law to regulate its advisory system (Decree 83-1025, 1983; Glynn et al., 2003). In the law the advisory bodies, the profile of the members and the mandate of the bodies is formulated. Only in some instances the French government is obligated to respond to the advice given by the bodies in the internal system. The advisory bodies are publicly financed and the independent position of advisory bodies operating outside the executive branch of government is emphasized. They have an independent role in providing neutral information to policy makers, but are not allowed to influence the policy and decision making process (Glynn et al., 2003). **Germany** does not have any national regulation to regulate its advisory system (Siefken, 2007), which is a result of the federal structure of Germany. The 'Länder' have significant space in their policymaking process and have their own advisory bodies. For some advisory bodies there is an obligation for government to respond to its advice. The independent position of the advisory bodies is also emphasized in Germany (Thunert, 2000). **The Netherlands** have a national law for regulating most of the internal advisory system (WRR, 2007). This law describes the mandate of advisory bodies. It details for example the number of members, the criteria for member selection, the obligation for advisory bodies to evaluate themselves and the obligation for the Dutch government to respond to the advices of the advisory bodies. In this response the minister reflects on the advice and its implications for the policy process (Tweede kamer der Staten-Generaal, 2011). The law emphasizes the independent position of internal advisory bodies allowing them to also provide unsolicited advice to government. **Sweden** has no general law for its advisory system. Although, the commissions of inquiry have an institutionalized position in the policy and decision making process (Glynn, et al., 2003). This process starts with a policy proposal of the Riksdag, the Swedish parliament. After that a commission of inquiry is consulted. The commission analyses the policy proposal and alternative policy options. In terms of reference the assignment and the time span for the research is formulated, without giving instructions on the content of the advice (Premfors, 1983). The time span for the research is limited to two years to speed up the policy making process, although some commissions take more time. In the third step the proposal is published and sent to several (civil and scientific) actors and organizations. This process is also known as the Remiss process and promotes the transparency in the policy making process. The actors and organization are invited to give their view on the proposal. Then the final proposal is sent to the Riksdag that votes on the acceptance of this proposal (Anton, 2002). The commissions of inquiry and other permanent agencies are publicly financed (Riksdagen.se, 2015). The Swedish government is not obligated to respond to the advice given, though government should make transparent what it did with the advice. The commissions of inquiry and the permanent advisory bodies (agencies) have an independent position towards government. **The United Kingdom** has a *code of practice* (principles of scientific advice to government) that prescribes that the advice should be given on professional and scientific bases and that the data gathering process should be transparent (Government Office for

Science, 2010). The Chief Scientific Advisor checks the use of these principles. The advisory bodies that operate a non-departmental public body are financed by different miniseries that also determine their budget. The advice strongly concentrates on evidence based policy and strategic foresight. Government has no formal obligations to respond or show use of the advice it receives. The code of practice also emphasizes the independence of the advisory bodies (Government Office for Science, 2011).

5.3 Composition

The cabinets in **France** are composed based on their ideological preferences and do have direct contact with the minister. Most of the high officials of France are educated by the Ecole National d'Administration (ENA). French top officials are high educated professionals that already from their student time build a large political networks. Politics and the top of the civil service (including the internal advisory system) are therefore intertwined. The less politicized advisory bodies are composed both out of experts, civil servants and representatives. The members can be selected by either 'peers' or by an official government organization. The French advisory system does not have a clear division between the functions of consultation and advice (Glynn, et al. 2003). In **Germany** some councils are composed of experts and academics and some are composed more from a corporatist point of view out of a combination of representatives and experts. In the academic councils the independent advice is highly valued, whereas the corporatist structures aim at creating consensus among different actors (WRR, 2007). The law in The **Netherlands** prescribes a strict division between consultation and advice as functions for advisory bodies with in the internal system with the former being abolished (Ministerie van Binnenlandse Zaken en Koninkrijksrelaties, 2011). With a few exceptions almost all internal advisory bodies in the Netherlands are therefore formally composed only of experts and scientists. In **Sweden** the commissions of inquiry and the advisory bodies are composed out of a mix of members, such as experts, scientists, civil servants, politicians, jurists and representatives. This mixed composition is highly valued because it is argued that this leads to a broad perspective on the policy proposal (Glynn, et al., 2003). In the **United Kingdom** the advisory bodies are only composed of experts. The advisory bodies are composed with a variety in gender, age and background. The scientific and independent perspective of advisory bodies is emphasized.

Country	Configuration	Administration	Composition
France	Politicized Ministerial cabinets'	Existence of law on advisory system with a high level of detail	Both experts and representatives
	Some advisory councils		
	Almost no ad-hoc commissions	For some advisory bodies a mandatory response of government to advice	No division between consultation and expert-advice

		Publicly financed	Members are selected through a council by peers or by official government organization
Germany	Many advisory bodies Mainly permanent councils and less ad hoc commissions Almost all federal ministries have their own advisory body	No central law or regulation, some 'Länder' have regulations For some advisory bodies a mandatory response of government to advice Publicly financed	Both experts and representatives No division between consultation and expert-advice
Netherlands	Structured advisory system Few permanent advisory bodies Many ad-hoc commissions	Existence of law on advisory system Mandatory response of government to advices Financed through public money	Experts Strict division between consultation and expert-advice to prevent advice of becoming a consultation process
Sweden	Many advisory bodies Mainly (ad-hoc) commissions (commissions of inquiry) Some permanent councils not linked to specific ministries	No uniform law on the advisory system, but terms of reference on their use with commissions of inquiry institutionalized in policy making process Unwritten rule to show what is done with the advice Advisory bodies are mostly publicly financed	Both experts and representative No division between consultation and expert-advice
UK	Recent reform of the landscape of advisory bodies General rule that ministries should have in-house technical and scientific knowledge, only little call for advice Few permanent advisory bodies functioning as a non-departmental body (NDPB) or scientific advisory committee (SAC)	No general law, but terms of reference detailing the internal advisory system Mostly publically financed Response to advices is not mandatory	Depends on the mandate of the advisory body: sometimes only civil servants and sometimes experts and scientist. <i>Neutrality</i> is key element. Division between consultation and expert-advice.

Table 4: summary of key features of internal advisory systems

6. *Analyzing internal advisory systems within political-administrative regimes*

In analyzing the fit of institutional elements of internal advisory systems within political-administrative regimes we take two approaches. First we look at the fit of the internal system within each of the explored countries itself. Secondly we look at the fit from a comparative perspective between countries.

Each of the internal advisory systems has institutional elements that show fit within the political-administrative regime of the country it is setup in. The internal advisory system in France that is dominated by political ministerial cabinets and composed from top political networks fits into a highly centralized structure of power. As does the core activity within the system that is to render facts for political decision making. The large internal advisory system of Germany that is composed of both experts and representatives and which is a product of self-regulation fits into a federal system where decentralized power has its own advisory systems and decision making takes place in more of a consensus setting. The Netherlands have for the longest time known an advisory system that showed fit with its consensual government structure. Having had a system up to 1997 that allowed for representatives to be members of advisory bodies, having a wide array of several hundreds of permanent councils that also allowed bodies to be used for consultation purposes. Being fed up with the ever growing system government abolished it and by law moved the system more towards a knowledge and expert-advice driven system. As for Sweden the internal advisory system fits into a long established tradition of the policy making process requiring each policy proposition to be advised on by a commission of inquiry. The decentralized state structure also fits with the follow up process of the commissions of inquiry in which a broad consultation process is set up. Having rather small ministries with large executive agencies we also see a fit with the largely temporary character of the bodies set up within the internal system. In the United Kingdom we see a fit between the internal advisory system that is knowledge and expertise driven with the Westminster (majoritarian) government structure. Government requires facts and knowledge for underpinning its policies, but the internal advisory system is to keep clear from political motivations.

When looking at the fit of institutional elements from a comparative perspective we notice that with regard to the *configuration* of the advisory systems all countries in their internal advisory systems set up both permanent and temporary bodies. The division between permanent and temporary bodies is different however. As is the general size of the internal system. Our data suggest that these differences may be understood from the political-administrative system the internal advisory system is setup in. In countries where power is centralized (France and the UK) we have encountered smaller internal systems, whereas in decentralized, coordinated or fragmented countries (Germany, Sweden, Netherlands) we encounter larger internal advisory systems. The division between permanent and temporary seems to be more the product of country internal policy or political-administrative traditions. The policy process of Sweden for example, that has very small ministries relies on ad hoc

commissions to bring together the right experts and interest groups to advice on each specific policy proposition. Thus there are many ad hoc commissions and fewer permanent councils. The Netherlands have abolished most of its permanent councils because the number had gotten out of hand only to see large numbers of ad hoc commissions being setup in the following period.

When it comes to *administration* we found that all countries in our comparison (except for Germany where happens on the level of the Länder instead of the federal level) in some way or another actively try to regulate the internal advisory system. So the political-administrative system does not appear to be an explaining factor for the existence of regulation. The Netherlands and France have a specific law on their internal advisory systems in which the mandate of the advisory bodies is established. In The Netherlands we found a relatively new setup of the internal advisory system, the law on advisory systems was only introduced in 1997. The United Kingdom has a code of practice concerning its scientific advice that was revised in 2010. Also in Sweden we did not encounter a law on advisory systems, but a long term and institutionalized tradition on advisory bodies that exists over 400 years. In Germany we did not find a law on a federal level, but we did find some indications of laws on the level of the different Länder. These regulatory effort are of particular interest since the independence of internal advisory systems is emphasized in all countries. Apparently the internal advisory system regardless of the political-administrative system it is set up in is in need of explicitly emphasizing its independence: it has contested autonomy. The advisory bodies within the internal system operate on an independent basis yet within disciplinary boundaries. Credibility is based on autonomy while disciplining the system is necessary to have some control over it. This struggle is visible in most of the internal advisory systems we explored.

If we consider the arrangements on how government has to deal with the advice it receives we notice a distinction between the Westminster and the consensus model. With the UK clearly leaving it up to government to decide if it wishes to respond to the advice and countries having an intermediate or consensus model formulating obligations for government to respond to the advice. The Netherlands, Germany, France and Sweden have some sort of obligation or tradition in which government is to respond to or show use of given advice (be it in specific instances or towards specific advisory bodies). This may be explained from the function advice has in these countries. As we also notice that most of these countries have both experts and representatives (or on occasion even public servants) as members in their advisory bodies and the function of the advice is not only on expert-advice but also on consultation government has to show its intentions with the advice in the light of future cooperation's. So the way in which government is to handle advice it receives fits the political-administrative regime of the country.

Finally, when looking at the *composition* of the internal system we tend to see the Westminster model of the United Kingdom with a strong focus on science and evidence based policy that therefore almost exclusively attracts experts. Government needs factual and scientific advice to underpin its policies and the position of civil servants is highly emphasized. In the intermediate and more consensus model oriented countries of for example the Germany, France and Sweden advisory bodies have also a function in creating consensus among societal actors. Though in France the focus of advice is also on giving depolitized, factual advice to government. The advisory bodies here also consist of representatives that have a certain interest in the advice that is given by the advisory body to government (compare Fobé et al., 2013). The Netherlands has a consensus tradition, but formulated a strict division in its law between ‘consultation’ and ‘expert-advice’. The advisory bodies in the Netherlands therefore only consist out of experts and professionals. In general the internal advisory system of The Netherlands seems to be moving more towards a knowledge-based expert-advice giving system like we would expect to see in the United Kingdom. This analysis emphasizes the struggle of policy makers in organizing both expertise for and legitimacy of policy decisions. Advice is based on facts and at the same time few governmental issues can be solved with facts alone. Values always play a part in the policy process. Our analysis shows how different countries deal with this struggle.

7. Conclusion and discussion

In this paper we have shown how the institutional setups of five internal advisory systems fit the political-administrative regimes they are set up in. From this we take two insights. First we argue that the internal advisory system is first and foremost a country specific arrangement. It is internally congruent. Each country has an internal advisory system that fits the needs of that specific country. Still, when taking a closer look we notice that the underlying struggles are the same for each country. Merely the choices made in dealing with them are different. We have emphasize two of these specific struggles. One is the attempt by governments to regulate internal advisory systems while at the same time emphasizing the independence of the advisory bodies. The other is the apparent necessity to incorporate facts and knowledge into the decision making process while at the same time incorporating value and opinions strengthening the legitimacy of the policy. Different countries cope with these struggles differently resulting in different setups of internal administrative regimes. For this reason learning from the institutional setup of internal advisory systems in other countries is difficult. Institutional setups cannot be transplanted into other political-administrative regimes. Even in rather comparable political-administrative regimes specific political situations give rise to different advisory setups. So learning from institutional setups is less a case of copying these institutional setups and more a case of defining the current position and underlying movements of a country and comparing those to choices made in other countries. In comparing the internal advisory systems we therefore see chances to better understand the developments in single countries, our example being The Netherlands

that seems to be changing its internal advisory system away from the consensus tradition more towards an expert-advice driven system.

Secondly we argue that since the different institutional elements of internal advisory systems are intertwined setting up advisory systems is a matter of taking steps on all the different elements. An obligation to respond to advice stemming from the advisory system for example fits with a system that has consultation at its heart and selects members of advisory bodies not only on expertise but also on the criterion of representativeness. This also underlines that in researching internal advisory systems' setups we have to consider the fit between these institutional elements.

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