



Accounting for Culture in Policy Transfer: A Blueprint for Research and Practice

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Abstract

In recent years, the burgeoning literature on transnational dissemination of policies has moved beyond orthodox models to incorporate the institutional context by means of social-constructivist approaches. This article engages in a critical review of the status quo by arguing for the importance of an overlooked key variable in policy transfer research: culture. Particularly, it is contended that culture plays an under-acknowledged role in co-shaping transfer dynamics both as a dependent and as an independent variable and consequently deserves a more thorough embedment in mainstream research. To this end, operational recommendations for how future studies can measure, incorporate, and isolate cultural factors are offered and a feasible research agenda is proposed.

Keywords

culture, policy transfer, policy translation, institutional bricolage, cultural analysis

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An Overlooked Institutional Variable

Public policy can be a matter of life and death. Simon Harragin (2004) recounts the terrible food crisis haunting Southern Sudan in 1998. When the famine hit, the UN and international relief agencies started apportioning food supplies to what were perceived to be the most vulnerable minorities while neglecting the increasingly dire situation faced by the entirety of the local population. In a situation of limited resources, local authorities began to undermine this strategy of targeted assistance by redirecting aid distributions to kinship leaders for further redistribution in line with the existing kinship welfare system, which privileged social hierarchy and family affiliation over individual needs. The consequences jointly produced by an underestimation of the scale of hunger and by ignorance of the sociocultural network and practices particular to the country's ethnic setup were nothing short of harrowing: "It is estimated that between 60,000 and

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100,000 people died as a result of the emergency in 1998 that would not have died normally” (Harragin, 2004: 315).

When traveling abroad for work or leisure, we intuitively grasp and feel the impact of cultural differences. In the age of globalization and transnational mobility of goods, persons, and knowledge, such sensitivity has proven all the more pertinent in our daily lives. The tragic example of Southern Sudan sorely illustrates the dangers of omitting the cultural context in the formulation of public policy. Since the notional birth of cultural relativism, that is, the recognition that cultural practices cannot be understood by means of externally imposed criteria, the study of cultural differences has assumed an increasingly prominent role in the academic world (Boas, 1911). Among other disciplines, organizational, business, and management studies have stressed its importance and pioneered in theorizing the contextual role of culture (Hofstede, 1980; Trompenaars, 1993). Yet, for multiple reasons, this approach has been largely confined to a small number of disciplines in the social sciences (e.g. see Bierbrauer, 1994, for the literature on legal culture).

Despite early seminal efforts by Wildavsky (1987) and with some laudable exceptions (Daniell, 2014; Rao and Walton, 2004), policy studies remains one of the areas that have struggled to recognize the role of culture as a contextual element worthy of consideration, so much so that Iris Geva-May (2002a: 243) declared culture “the neglected variable in the craft of policy analysis.” Undoubtedly, the past two decades have seen a mushrooming of comparative policy analysis in general (Geva-May et al., 2018) and of policy transfer research in particular, following empirical trends toward increasing transnational diffusion (Minkman et al., 2018). Nevertheless, policy transfer researchers so far seem to have shied away from developing a comprehensive theoretical and methodological framework for studying the impact of culture on such processes beyond situational accounts (Bertram et al., 2020; Harring et al., 2019; Jeong et al., 2012). This contribution intends to challenge this cultural apathy by outlining a culture-sensitive approach to policy transfer analysis. In particular, it is argued that employing aspects of culture as independent and dependent variables shaping the reception, translation, and incorporation of policy transfer will contribute to a better understanding of the dynamics and ultimate success of such processes. In order to guide future endeavors, some methodological recommendations concerning the conceptualization and measurement of cultural factors are put forward. With a view to adequately capturing the conceptual and empirical richness of the field, this article makes use of Geert Hofstede’s influential and figurative definition of culture as “the collective programming of the mind which distinguishes the members of one human group from another” (Hofstede, 1980: 13). Seeing culture as a sort of “mental software” allows for a consideration of the manifold values, symbols, and patterns of behavior commonly subsumed under the culture label. In addition, the metaphor usefully visualizes the fluid and evolving nature of culture in line with social developments, just like software is constantly updated to function in new operating systems. In contrast to more detailed and focused formulations, Hofstede’s rather inclusive conceptualization thus fits neatly with the explorative outlook of this study.

After clarifying and delineating the conceptual arena, I will revisit Geva-May’s claim about the neglect of (cross-)cultural theory with a focus on the policy transfer literature, from which I seek to derive a theoretical approach to account for cultural variables. Building on this groundwork, the core of my argument highlights the importance of cultural sensitivity in transfer and diffusion processes. The subsequent section, ‘Building a Methodological Repertoire’, then lays out some of the most pertinent methodological tasks faced by culture-sensitive scholars. Drawing on these insights, the conclusion

formulates a research agenda and spells out some common pitfalls. Naturally, my aim is not to develop a full-fledged theory of cultural co-determination of policy transfer, for this would be a Herculean task for any single researcher. Rather, the focus lies on reviewing the growing transfer literature narratively in order to provide a blueprint for researchers wanting to carve out the implicit or explicit role of culture.

Tracing the Evolution of Policy Transfer Studies

A few words on the conceptual boundaries of policy transfer are in place to situate this article in the muddled landscape of existing scholarship. The phenomenon of policies “traveling” abroad (Kingfisher, 2013) has been a source of inspiration for numerous researchers, resulting in a myriad of different labels and conceptualizations. These include “lesson-drawing” (Rose, 1991, 1993), “institutional transplantation” (de Jong et al., 2002), “policy diffusion” (Maggetti and Gilardi, 2016; Marsh and Sharman, 2009; Simmons and Elkins, 2004), “policy mobility” (Cochrane and Ward, 2012), “policy translation” (Stone, 2012), “policy learning” (Dunlop, 2009; Dunlop and Radaelli, 2018), “institutional bricolage” (de Jong, 2013; Stone, 2017), and “policy assemblage” (Clarke et al., 2015; Prince, 2010). Proponents of these respective strands of research have quarreled over conceptual questions for decades, putting forward varying definitions and seeking to delineate themselves from others’ work. Disciplinary backgrounds, analytical foci, and emphases placed on specific aspects of the processes under study differ according to the perspective employed (Delcour and Tulmets, 2019; Dolowitz and Marsh, 2012; Dussauge-Laguna, 2012a).

Nevertheless, there is considerable and increasingly recognized overlap between the existing approaches. The legitimate and productive debates about their relative demarcations are not worthy of reiteration for the purposes of my argument, as others have taken up that task (Maggetti and Gilardi, 2016; Marsh and Sharman, 2009; Mattocks, 2017). Instead, this article will build on Dolowitz and Marsh’s (2000) seminal work on policy transfer, which has surged as one of the most influential and widely accepted formulations (Benson and Jordan, 2011). Describing their approach as a “heuristic” rather than a fully developed theory, Dolowitz and Marsh (1996: 344) define policy transfer as “a process in which knowledge about policies, administrative arrangements, institutions etc. in one time and/or place is used in the development of policies, administrative arrangements, and institutions in another time and/or place.” This rather broad working definition captures the essential elements of transfer processes and builds on their contextual link to a given time and place. Recognizing this spatial and temporal—and therefore also socio-institutional—specificity is a prerequisite for considering the role of cultural variables. Indeed, Mark Evans goes as far as to elevate cultural specificity to a defining feature of transfer, which he conceptualizes as “the *cross-cultural* transfer of knowledge about institutions, policies or delivery systems from one sector or level of governance to another level of governance in a different country” (Evans, 2009: 238, emphasis added).

In general, existing theories on policy transfer can be roughly divided “between the rational-formalist tradition of work on policy transfer, rooted in political science, and social-constructivist approaches emerging across other social science disciplines” (McCann and Ward, 2013: 3). In recent years and after explicit calls to move toward multidisciplinary and social-constructivist approaches (Benson and Jordan, 2011; Dolowitz and Marsh, 2012; McCann and Ward, 2013; Peck, 2011), the rational model viewing policy transfer as mechanic, state-centered, and linear has come under increasing attack.

Critics point to the multiplicity of actors (Stone, 2004), examine the crucial role of time in the process (Dussauge-Laguna, 2012b), stress dynamics of co-adaptation and mutual learning (de Jong, 2013; Peck and Theodore, 2001), or question the role of social beliefs throughout the process (Kingfisher, 2013). Sun Kim (2017: 373–374) goes as far as to argue that

[i]n fact, most of the critiques [. . .] directly or indirectly acknowledge the cultural aspects of policy transfer: conflicts between global and local actors, and changes across time and in space happening in the process and practice of policy transfer are inevitably influenced by the cultural and historical factors of a locality.

My argument falls within this rising tide of critical analyses that explicitly factor in the pervasiveness of social forces.

Where Is the Culture? Policy Transfer in Context

The importance of context is generally a well-recognized fact in the body of policy transfer literature (Minkman et al., 2018; Randma et al., 2012). Existing classifications of contextual elements—biophysical (Attard and Enoch, 2011), institutional (Bulmer and Padgett, 2005), socioeconomic (Wood, 2015), or political (Cook and Ward, 2012)—relate to all conceivable aspects of the process (Dolowitz and Marsh, 2000). A number of these contributions account for the role of cultural attitudes in one way or another and with differing emphases, but close to none elaborate this feature at greater length. Instead, existing cultural research of policy transfer is selective, dispersed, and piecemeal. This section revisits some of the most influential streams in the literature to identify promising entry points for cultural analysis.

In exploring how to conceptualize culture's influence, multiple approaches come to mind. Early contributions stress (lacking) "cultural proximity" as a constraint on transfer (Dolowitz and Marsh, 2000: 9). Such a simplistic view is problematic for many reasons. Not only does it lack proper operationalization: in light of the increasing recognition of cross-cultural fertilization and co-adaptation, a binary picture of either present or absent "proximity" seems inappropriate to grasp the rich dynamics at play. Instead, Gita Steiner-Khamsi's (2014) process-centered model provides a more nuanced perspective by means of distinguishing between the two interdependent and consecutive, yet logically distinct processes of reception and translation. In her view, the reception stage takes into account those contextual features that increase the receptiveness for policies from elsewhere, whereas the translation stage captures "the act of local adaptation, modification or re-framing of an imported reform" (Steiner-Khamsi, 2014: 153). In a nutshell, whereas reception describes the *input* side of policy borrowing, that is, its underlying motivation and introduction to the policy agenda, translation relates to the *throughout* and *output* stages. Another crucial stage of any transfer process needs to be accounted for, however: the *outcome* of transplantation as measured by the degree of incorporation of the transplant into a given target audience or community. Essentially, incorporation denotes notions such as policy success, acceptance, and effectiveness, and is evaluated against given (usually predetermined) normative criteria (Fawcett and Marsh, 2012; Marsh and McConnell, 2010). Notably, reception, translation, and incorporation do not follow a linear trajectory but can be intertwined and complementary: after its initial reception, a transferred policy may be punctually or constantly retranslated in line with certain incorporation parameters such as public acceptance.

Arguably, cultural characteristics play a role in each of these three stages. For example, Tim Legrand (2016) demonstrates how the mutual reception of policies has been massively facilitated by a common political culture in the Anglosphere. In a similar vein, Francis Castles (1993) speaks of “families of nations” within which policies diffuse with great ease due to similar institutional and cultural arrangements. Mark Evans (2009) explicitly (and somewhat pejoratively) recognizes but oversimplifies culture as a key “cognitive obstacle” in the pre-decision phase. In general, cultural prejudices and the resulting selectivity in the receptiveness of (potential) transplants are recurring themes in the literature (Lao, 2015; Steiner-Khamsi, 2014; Stone, 2017; Weyland, 2006). Statistical analysis seems to tentatively confirm these hypotheses. For instance, a recent study on the adoption of renewable electricity as a (partly policy-driven) innovation found a significant relationship between cultural values and diffusion levels across 66 nations (Kaminsky, 2016).

Regarding the second stage, translation, Bertram et al. (2020) demonstrate how cultural orientations toward the future can co-explain certain design features in migration and integration policy by favoring the adoption of culturally proximate choices. Other studies in the “translational” camp have emphasized the role of communication (Park et al., 2014), a process that is deeply dependent on, if not entirely constructed by, its cultural environment (Bel, 2010; Bonvillain, 2020). The translation of a policy is inextricably bound to the actors involved in the “localization” of the transplant in question (Hasan et al., 2020; Kuhlmann and Annandale, 2012; Wood, 2015; Zapata and Zapata Campos, 2015). Such agency-centered models stress the importance of a diverse range of agents at every step of the transfer process and allow for a differentiation of various kinds of (sub-)cultures, for example, bureaucratic or policy culture (Common and Gheorghe, 2019). Diane Stone (2004) identifies at least eight different types of agents, from business lobbyists and think tanks to societal pressure groups to bureaucrats, elected officials, and international organizations. Her analysis explicitly factors in cultural similarity as a cognitive heuristic, especially in the reception and incorporation stages. Subsequent empirical studies have highlighted transfer agents in more detail, including inter alia the role of bureaucrats in spreading policy expertise on river delta planning (Hasan et al., 2020), feminist groups in mainstreaming gender into healthcare policy (Kuhlmann and Annandale, 2012), urban policymakers adopting innovative transportation systems (Wood, 2015), or expert policy entrepreneurs embedded in “instrument constituencies” around the issue of poverty reduction policies in the Philippines (Saguin and Howlett, 2019). Inevitably, all those involved in policymaking are consciously or unconsciously guided by cultural parameters in both their preference formation and their actions (Wildavsky, 1987). Put bluntly, any recognition of individual or organizational agency implicates a recognition of the cultural forces to which these agents are subject, as is a well-established fact in the literatures on cross-cultural management, marketing, and communication (Thomas and Peterson, 2018; Trompenaars, 1993). If one adopts Hofstede’s (1980: 13) vivid definition of culture as the “collective programming of the mind,” it becomes difficult to conceive of any actor within the process escaping culture’s reach.

Moving beyond translation, culture may also serve as the mediate or immediate subject of transfer, in the sense of a deliberate “soft” diffusion of certain cultural norms. Such proliferation of beliefs and attitudes is well known and well studied in history, anthropology, and cultural geography under the label of “cultural diffusion” (Levitt, 1998). A captivating example is presented by the spread of cricket as a by-product of

colonialism (Kaufman and Patterson, 2005). Although mentioned by Dolowitz and Marsh (2000), this process has received rather little attention in the context of policy transfer so far (a laudable exception is provided by Stone, 2004).

Third, and perhaps most studied and acknowledged, culture carries considerable weight in the incorporation stage of policy transfer. Indeed, early contributions to the literature have repeatedly noted the role of culture in facilitating or preventing successful transfer (Rose, 1993), including Dolowitz and Marsh's (2000) concept of "inappropriate transfer." For example, Fawcett and Marsh (2012) employ this latter lens to underline how a shared culture enabled the success of a transplanted review program. However, the binary view of "success" and its mirror image "failure" implicated in these theories has been subjected to much legitimate criticism denouncing it as overly rationalistic and as overlooking the instrumental value of "error" in policy learning and translation (Stone, 2017). Moreover, employing these seemingly absolute and objective categories neglects the degree to which success criteria are themselves culturally informed (Geva-May, 2002b; Wildavsky, 1987). Nevertheless, empirical studies have found convincing associations between the cultural dimension of a policy transfer and its incorporation in the target system, irrespective of whether "success" is defined by internal, self-determined objectives or against external standards. In their meta-study of policy transfer routes, Minkman et al. (2018: 235) conclude that culturally co-determined "normative and institutional fits" are a decisive catalyst for transfer processes. Other studies illustrate the same for stakeholder engagement in contaminated land management (Sam et al., 2017), educational policy transfer (Kim, 2017), sustainable transportation policies (Ashmore et al., 2018), and the acceptance of a new public information system (Kim and Kim, 2010).

Finally, another strand of research has disregarded the process-centered model of policy transfer in favor of a holistic perspective. Influenced by a wider trend toward an "idea-tional" analysis of public policy that marries sociological knowledge with political science insights (Béland, 2009), policy transfer has been recast through the concepts of "institutional bricolage" (de Jong, 2013) and "policy assemblage" (Clarke et al., 2015). Both derive their inspiration from the creative arts and share a common understanding of transfer as policy (re-)creation from a variety of available source material (Stone, 2017). The resulting artifact is a hybrid formation that draws on a pool of local, transnational, and global knowledge to assemble a context-informed transplant. Writers on institutional bricolage argue that formal (e.g. policy) and informal (e.g. culture) institutions are deeply intertwined and may cross-fertilize each other: "'bureaucratic' institutions may be 'socially embedded,' but are not inevitably so, while processes of bricolage may result in the bureaucratisation of 'traditional' cultural or social arrangements" (Cleaver, 2002: 13). Hence, an integrated analysis of the "institutional whole" must combine cultural elements with formal aspects of policy transfer. It is therefore unsurprising that bricolage scholars have stressed how transfer agents strategically or inadvertently employ cultural sensitivity in importing foreign policies (Carstensen, 2017; de Jong, 2013; Koppenjan and de Jong, 2018). What is more, the institutional perspective incorporates the potential impact of public policy in shaping culture, a much-overlooked effect of transfer practices. In turn, policy assemblage entails the "work of aligning divergent political motivations, translating different ideas, and rendering appropriate subjects and spaces" (Prince, 2010: 183). From this perspective, culture can be seen as a kind of assembling aid in guiding or latently steering the assembly process (Koh, 2011; Mellaard and van Meijl, 2017; Schwittay, 2011).

In conclusion, diverging perspectives on policy transfer (process-oriented, agency-centered, “assemblage” approaches) fail to systematically account for cultural variables beyond rather simple models and catch-all phrases. At the same time, various entry points urgently demand or at least allow for an extended consideration of the cultural environment.

The Case for Cultural Sensitivity

Catherine Kingfisher (2013: 3) posits that “two insights—policy as a power-laden artifact and architect of culture, and policy produced not only officially but also in a myriad of unofficial ways—serve to displace models of policy as rational, neutral and acultural.” This displacement of the aculturality of policy is an indispensable realization for any culturally sensitive scholar or practitioner. The preceding section has provided a conceptual synthesis of cultural bearing on different transfer stages, actors, and institutions. But *why* does culture matter? Two different perspectives come to mind.

From an instrumental point of view, culture constitutes an indispensable variable upon which the design and outcome of transfer hinge. This is the viewpoint assumed by orthodox, rationalistic theories on policy transfer and by those scholars standing in their tradition. What is more, an instrumental understanding of culture is arguably of utmost value to policy analysts and transfer practitioners that require a practicable and intuitive guideline to factor context into their considerations. To illustrate this point in the context of democratization, Ammar Maleki (2015) argued for a cultural compatibility lens on different models of democracy in the sense of moving from the idea of “best practices” toward “most compatible models.” In contrast to the former, the latter notion extends beyond normative prescriptions to serve a given predominant culture by considering the more variegated interactions between different models of democracy and cultural factors. In policy transfer, a similar approach seems sensible. For example, whereas aligning policy design with the cultural orientations of the target group can bear positively on transfer acceptance, the same strategy may also lead to the adoption of culturally proximate but otherwise inadequate, ineffective, or even harmful design choices (Bertram et al., 2020). Cultural compatibility can thus both facilitate and aggravate successful transfer. In this scenario, culture is usually treated as an independent variable and its impacts on some given dependent variable. This research design has been tentatively explored with regard to the cultural co-determination of, for example, public acceptance of environmental engineering policies (Karimi and Toikka, 2018), the symbolism of sustainable cars and its related policy implications (Ashmore et al., 2018), or the adoption of renewable electricity (Kaminsky, 2016). While existing studies employ a healthy mix of statistical and qualitative methods, similar research across different sectors will become necessary to strengthen the explanatory force of these relationships empirically beyond mostly descriptive accounts. In addition, the dependent variables employed so far have only covered specific aspects of transplantation outcomes such as policy acceptance or adoption. A promising gap to be explored connects these methods to the rich literature around policy transfer success (Fawcett and Marsh, 2012; Stone, 2017) by developing more refined operational measures of successful transfer as a dependent variable.

As alluded to above, however, another view of culture as intrinsically worthy of study has emerged among critical and social-constructivist approaches. These scholars seek to explore sociocultural dynamics in detachment from the straitjacket of orthodox paradigms in order to reach a deeper analytical understanding of transfer, translation, and

bricolage processes. At least to some extent, this requires a recognition of the bounded rationality of the process at hand (Weyland, 2006), with culture serving as one of multiple factors mitigating rationality and deconstructing the image of a linear sequence. Within the social-constructivist school, culture becomes relevant by virtue of its connection to a spatial or temporal *locus* within which policy assemblage and “localization” take place. Cultural sensitivity therefore entails an appreciation of the continuing effects of cultural co-determination in shaping adaptation processes (Kim, 2017). Viewed from such perspective, culture effectively becomes the immediate object of study; it is treated not merely as an independent but at least partially also as a dependent variable. Regrettably, empirical studies with such an outlook are still scarce. Martin de Jong’s (2013) otherwise captivating account of selective institutional bricolage processes in Chinese bureaucracy leaves the reader wondering how the long-standing diffusion of Western policies have impacted, and will co-shape, Chinese attitudes in the long term, both within policy elites and among the general population. This is all the more intriguing in light of the widespread assumption repeatedly expressed by (mostly US-American) scholars that privatization and economic liberalization policies will inevitably render Chinese political culture more permeable for democratic values and tendencies (Redding, 1996). Other studies do factor in the impact of policy on culture or social change more broadly, but lack the comparative, policy transfer-informed lens: they highlight the interactions of specialized court tribunals with the wider community in the United States (Mirchandani, 2005) or stress the importance of shifting cultural perceptions about violence in extant prevention programs (World Health Organization, 2009). Merging the insights of the latter with the vocabulary and outlook of policy mobility scholarship could go a long way in understanding the reciprocal dynamics between formal institutions and mostly informal culture.

Irrespective of the stance taken along the conventional-heterodox spectrum, cultural analysis deserves a more thorough embedment in the toolkit of policy transfer scholars and practitioners. Answering this call, however, presents novel methodological challenges for those wishing to consider cultural elements. The following section will outline some of the most pertinent obstacles in conducting culturally sensitive research, without definitively resolving them or establishing a universally applicable methodology. Notably, these questions are not new and have received extensive treatment in the cross-cultural literature. The added value of this overview lies in its policy transfer-informed perspective.

Building a Methodological Repertoire

Defining, Conceptualizing, and Operationalizing Culture

In spite of the overwhelming volume of literature on the topic, one of the most disputed questions in cultural research concerns the notion of culture as such. Its socially constructed and context-dependent nature has rendered culture a somewhat elusive phenomenon in the social sciences, one that is intuitively understood but notoriously difficult to apprehend conceptually. It is therefore unsurprising that fierce scholarly debates have produced a colorful range of definitions with differing degrees of overlap. In the early days of anthropological research, culture was often equated with simplified, pseudo-scientific, and racially tainted notions of ethnicity, race, and religion, influenced by the legacy of colonialism (Manganaro, 2002). At least since the end of the World War II, however, cultural research emerged as an independent field of research (Kluckhohn,

1951; Parsons et al., 1951). The cultural pioneer Edward T. Hall summed up the early conceptual challenges neatly: “Culture hides more than it reveals, and strangely enough, what it hides, it hides most effectively from its own participants” (Hall, 1973: 30).

An attempt to synthesize the debates and developments in this field here would be futile (and has been laudably shouldered by others, such as Daniell, 2014; Hofstede, 1991), so I will restrict myself to mentioning a few pressing points. Definitions of culture are as colorful as they are contested (Hall, 1976; Hofstede, 1991; Kluckhohn, 1951; Parsons et al., 1951; Schwartz, 2006; Triandis, 1994; Trompenaars, 1993). Most of these share a recognition of cultural subcomponents in the form of shared values, norms, attitudes, and practices within a predefined group. Among other parameters, conceptualizations differ according to their respective disciplinary backgrounds. In the reign of political science, one of the most prominent approaches comes from anthropologist Mary Douglas, who was later joined by Aaron Wildavsky in developing a relatively simple model of distinguishing between broad cultural attitudes in the context of policy and politics: Cultural Theory (Douglas and Wildavsky, 1983). Cultural Theory provides a tool to make sense of institutional competition by situating individuals along two metacultural dimensions of *group*, that is, the degree of incorporation into a social unit, and *grid*, that is, the degree to which position-specific constraints are imposed. Douglas and Wildavsky’s work, though far from being unchallenged (van der Linden, 2015), has been particularly influential in policy studies (Verweij and Thompson, 2006). For the context of policy transfer, the crucial question of conceptualization is arguably an open one and will partially be influenced by the field of research and the specific object of study. Notably, whichever theory of culture is adopted will ultimately also bear on its operationalization. Decades of research have provided a rich variety of cultural dimensions, some with qualitative roots (Douglas and Wildavsky, 1983; Triandis, 1994), while others have been extracted from large quantitative data sets such as Hofstede (2011) or the GLOBE (Global Leadership and Organizational Behavior Effectiveness) study (House et al., 2004). This somewhat messy and overlapping field has been helpfully organized into “clusters” by Maleki and de Jong (2013), resolving some of the open academic disputes. Since many of these “dimensionalizations” vary in analytical refinement and have been subjected to legitimate criticisms, this choice is not a trivial one and requires careful deliberation and justification. With some exceptions (Ashmore et al., 2018; Bertram et al., 2020; Kaminsky, 2016), the scarce studies that do recognize cultural difference as a relevant factor fail to clearly conceptualize and operationalize culture. Emblematic of this shortcoming is Harold Wolman’s (2019) rather casual and selective analysis of differing “political cultures” between Canada and the United States in his evaluation of the transferability of regional governance institutions. The ubiquity and intuitive appeal of the “culture” term invite such a laissez-faire approach. In light of the unresolved debates, however, omitting a clear and well-justified definition and coherent conceptualization diminishes a study’s analytical clarity and runs risk of sparking more confusion than insights.

Level of Analysis: From Organizational Culture to Global Culture

Culture is not a monolith—it is a multifaceted system with multiple, partly congruent layers to which any individual is subjected (Karahanna et al., 2005). These layers hinge upon the size of the community in focus: from relatively small groups with few members to organizational culture, to nationally shared values, and even transnational or global common cultural traits as proposed by cosmopolitanists (Appiah, 2006). Different layers

may be in conflict with each other, with definitive consequences for the policy transfer process. For instance, Jochem de Vries (2015) examines how “planning culture” as a bureaucratic subculture may run counter to societal culture at large and concludes that this misfit can co-explain differences in the urbanization processes between the Netherlands and Flanders. Naturally, the level of analysis is dependent on the wider policy transfer theory employed and the concrete object of study. Organizational and professional “policy” culture may be a useful lens in examining the translation and assemblage practices engrained in transfer. In their account of Romania’s public administration, Common and Gheorghe (2019) find that a bureaucratic culture deeply burdened by the country’s communist legacy and high levels of politicization has fueled “strategic” policy transfer processes. These are marked by a desire to satisfy external stakeholders such as the European Union (EU) and consequently display low levels of internal acceptance, which in turn negatively impacts desired outcomes (Common and Gheorghe, 2019). On the contrary, societal or national culture seem to provide a useful perspective in examining the incorporation of transplants, at least in somewhat homogeneous societies. Among others, this outlook has been taken up in Ashmore et al.’s (2018) recent assessment of cultural attitudes toward environmentally friendly vehicles (and related policies) across different cultural clusters.

In addition, levels of analysis are not uncontested: the use of arbitrarily drawn up and often colonially imposed nation-state borders has been criticized as inadequate to capture the richness of pluralistic societies (McSweeney, 2002; Wallerstein, 1990). Although many operationalizations of culture are still state-centered (Hofstede, 2011; House et al., 2004; Schwartz, 1992), this “methodological nationalism” (Stone, 2004: 545) is slowly being replaced by alternative models. Some of those stress the role of transnational agents and the emergence of a global policy culture (Simmons and Elkins, 2004; Stone, 2004). Within the EU and its rising significance as a “massive transfer platform” (Bulmer and Padgett, 2005), distinctly European configurations of culture have crystallized, as Benson-Rea and Shore (2012) demonstrate in their study of EU diplomacy culture. Apart from supranational variants, subnational, regional, and local cultures have also received increasing attention. For example, Hogler and Henle (2011) convincingly argue that differences in regional values held across the United States can explain the prevalence of anti-unionist law and policy at state levels. Whereas early formulations of these phenomena were rather anecdotal in nature and lacked proper systematization, recent studies have both empirically grounded and conceptualized alternative accounts of culture beyond the nation-state in promising ways (Richter et al., 2016; Venaik and Midgley, 2015).

Object of Analysis: What Aspects of Culture?

Any culture-sensitive scholar is confronted with a jumbled toolkit of cultural dimensions (elsewhere termed values, orientations, or attitudes). Some of these have seen a successful history and have been taken up in numerous studies, such as Hofstede’s (and others’) scale from individualism to collectivism and Douglas and Wildavsky’s axes of “group” and “grid,” while others have been less influential (see Minkov and Hofstede, 2013, for an overview). In theory, a pre-selection of single dimensions can be circumvented by including all potential elements of any given operationalization in the analysis, as seen with some statistical approaches (Kaminsky, 2016). Nonetheless, such research designs are often prohibitively burdensome and prior hypothesizing thus becomes necessary. Which cultural orientation affects a particular transfer is highly dependent on the

transplanted policy, as well as on other contextual factors. A panacea is not at hand; any cultural analyst must carefully choose and justify whichever dimension is employed by reference to the specific circumstances. Notably, such choice may also be subject to an availability bias, as data are more readily available for some dimensions (e.g. Hofstede and GLOBE, whose dataset on a wide range of countries is accessible online) than for others (in particular qualitative dimensionalizations that lack comprehensive empirical grounding). A successful example of this is provided by Ashmore et al. (2018), who convincingly establish the presumption that the power distance and the collectivism/individualism scores of a society are of particular relevance to the dependent variable of “eco-cars” symbolism.

Given the diversity underlying culture as a social phenomenon, any classification into linear dimensions must necessarily simplify the dynamics at stake—providing a tool or a heuristic for policymakers and scholars rather than an extensive description. As such, the model has various shortcomings and limitations, including a bias toward quantitative analysis and a static view of culture (Signorini et al., 2009). In addition, it may be empirically flawed by failing to factor in related social mechanisms (Heine et al., 2002). Alternative, more complexity-embracing and sector-oriented operationalizations of culture may therefore be mandated to reach a fuller understanding of policy transfer, especially for studies with a qualitative focus and where context specificity is high. A case in point is the realm of education policy, in which historical-cultural legacies and particular political values loom larger than universalizing dimensions along collectivist/individualist lines, as increasingly recognized and refined in the literature (Kim, 2017; Koh, 2011; Steiner-Khamsi, 2014). Similarly, an arresting study in the context of the ongoing COVID-19 pandemic shows that specific cultural subcomponents such as attitudes toward handwashing correlated with the speed and magnitude of spread during the early stages of the virus’s diffusion in March 2020 (Pogrebna and Kharlamov, 2020), suggesting that differentiated policies may need to be taken by authorities in response to the threat.

Accounting for What? Isolating the Impact of Culture from Other Contextual Factors

A fourth methodological challenge for the culturally sensitive policy diffusion scholar is owed to culture’s fluid boundaries with other social institutions. How can the effects of culture on transfer processes be isolated from the interconnected surrounding context? Unsurprisingly, this challenge has been haunting the field of cross-cultural studies since its seminal stages. The transfer of policies is embedded in an equally complex social network, being subject to political institutions, economic rationales, and public pressure. In the absence of opportunities to manipulate variables, one way forward consists of investigating atypical, distinctive modes of sociocultural organization and their interaction with policy dynamics. This is the case where, for example, administrative borders divide culturally homogeneous populations. Daniel Posner makes use of such a “natural experiment” in analyzing why cultural differences become politically salient in some cases and do not in others (Posner, 2004). While his findings elucidate political mobilization dynamics more generally, his method of exploiting existing real-world cases could prove useful in understanding why transplanted policies often take on a life of their own in other cultural contexts. This point also relates to earlier appeals to move from methodological nationalism toward scrutinizing different forms and effects of transfer within multicultural and ethnically diverse nations such as India, South Africa, Switzerland, and many others.

For comparative scholars, the key to controlling for other contextual influences lies in a careful case selection. Analyzing cases with similar contextual features other than culture (e.g. similar motivation and timing of the transfer, similar policies transferred, similar institutional framework) in the sense of a “Most Similar Systems Design” (Anckar, 2008) strengthens the explanatory force of cultural variables and enables meaningful comparison while avoiding a misleading and inaccurate cultural determinism. Recent applications of this can be found in Bertram et al. (2020) with regard to refugee sponsorship policies in nine countries and in Bode (2015) in relation to hospital policies in Mexico and Germany.

A final approach that has gained considerable traction explicitly studies the integration of culture into other institutions (Béland, 2009; Cleaver, 2002; de Jong, 2013). In their search for new tools, Mukhtarov et al. (2017) prepare the ground for ethnographic research of policy translation in a somewhat radical shift away from traditional political science methodology toward anthropological and sociological epistemologies. Analyzing translation processes by observing policies, places, and actors ethnographically requires an active, participant immersion of the researcher in the policy environment, as repeatedly called for in recent contributions (Clarke et al., 2015; Kingfisher, 2013; McCann and Ward, 2013). This offers auspicious modes of investigating the micro-politics and micro-cultures involved in the creation and implementation of policy knowledge. In addition, these new methods stand to unearth, confirm, or dismiss some of the generalizing assumptions produced by orthodox transfer studies. Indeed, as the literature moves further away from conventional comparative analysis, the issue of isolating culture to account for a dependent variable is likely to fall behind an intrinsic treatment of cultural embedment.

What Role for Culture in Policy Transfer Research? Carving Out a Research Agenda

Part of the attractiveness of policy transfer as both a conceptual and empirical phenomenon lies in its idiosyncratic position within the wider tension between the global and the local in times of growing interconnection. As such, it epitomizes the struggles of scholars and practitioners to grapple with a shared (and converging?) global policy community (see Kingsbury et al., 2005; Slaughter, 2009) in the nation-state centered paradigm. I have attempted to add an overlooked variable to the toolbox of policy transfer students: culture. As a latent but omnipresent environmental factor, it plays a key role in the cross-national reception, translation, and integration of policies, as increasingly recognized by a nascent generation of context-sensitive transfer research. Since a comprehensive framework for recognizing this role is still lacking, I have outlined some of the conceptual debates and methodological struggles faced by scholars embarking on this task. A number of caveats deserve to be spelled out at this point. The first one is a warning: a recognition of cultural *co*-determination of transfer processes must avoid the trap of cultural determinism, that is, it must remain critical at all times and look for other explanatory factors. In addition, there is a danger of “culturalism” in the sense of ascribing value-laden judgments to cultural attitudes (for a negative example, see Harrison and Huntington, 2000). Although notions of “best culture” and “inferior cultures” are (unfortunately) still widespread, they are not only ethically repulsive but also factually inaccurate and unscientific. Culture constitutes an ever-changing and complex social force and cannot be evaluated against external standards. A final limitation concerns the ambition of this contribution: rather than claiming universal interdisciplinary applicability and an

exhaustive review of the literature, I have sought to provide some seminal ideas and collect relevant work about the intersection of policy transfer and cross-cultural studies, in the hope that other scholars will take up some of these ideas in future studies.

What are some of the paths that future research could explore? To begin with, cultural values deserve a deepened analysis in exploring transfer incorporation, that is, policy success and effectiveness. Arguably, much of policy transfer research tries to establish why transfer fails and how failure can be prevented. Empirical studies on cultural interference are a crucial instrument to answer this question. Another interesting avenue lies in exploring the myriad of ways in which culture shapes translation processes. Whether and how do cultural orientations contribute to the specific type, degree, object, actor, and/or motivation of transfer? For example, Diane Stone (2004) stresses the pivotal differences between the “soft” diffusion of (cultural) norms by inter- and supranational institutions and a “hard” transfer of policy structures. The latter may well display a distinct interaction with culture than the former. In general, the understudied phenomenon of culture as an *object* of transplantation provides an auspicious strand for exploration. In addition, there may be sector-specific differences that warrant further attention: in recognition of professional, organizational, and “policy” cultures, different policy areas are likely to exhibit unique degrees and dynamics of culture co-determination. What is more, the relationship between relevant subcultures and societal culture at large can go a long way in explaining transfer processes, as Jochem de Vries (2015) demonstrates. A more normative branch of analysis might explore methods of facilitating cross-cultural receptivity and policy dialogue to accelerate policy diffusion. Finally, the impact of foreign transplants on local cultures ought to be examined critically (Sen, 2004). After all, the (more or less voluntary) spread of neoliberal policies to countries of the Global South has shown numerous disruptive effects (Goldman, 2005; Simmons and Elkins, 2004). For some, the notion of policy transfer is no more than a euphemism for the creeping imposition of hegemonial policy and ideology. These asymmetries of power inherent in the transfer concept should be investigated further in the context of culture and its related social categories of race, gender, religion, and so on.

In following the preliminary agenda sketched here, the design of culture-sensitive methodologies and appropriate research strategies will require heightened attention if meaningful insights are to be gained. But the grounds for such an—undoubtedly challenging—exercise have been prepared by recent scholarship and the payoffs are tangible. In view of the field’s conceptual pluralism and popularity, a cultural turn in policy transfer studies seems a long overdue and extremely promising development of the current literature. The far-reaching, sometimes definitive effects of culture in and for the craft of public policy deserve an elevation from their current niche existence into mainstream research.

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