International comparisons: how can we learn lessons from social policy solutions in other countries?

Dr Tony Munton

Where the aim is to import wholesale examples of best or good practice then the evidence for successful transfer suggests you simply can't. But what international solutions can provide are the questions we need to ask if we are to find our own solutions to social policy issues. The key to making the best use of international comparisons is to make sure enough time is spent understanding the context in which successfully policy solutions have been delivered in other countries.

As anyone involved in providing research evidence for governments will know, the appetite for knowledge on what other countries do shows no sign of diminishing. The European Union offers a dizzying number of opportunities for cross border policy comparisons. The OECD has set up talking shops for the exchange of policy ideas. Similarly, the United Nations sets great store by making available the details of international policy information (the most unlikely example of which is probably is the UN-HABITAT's Global Atlas of Excreta).

The UK government's approach to the value of international comparisons in policy making is typical. The Centre for Management and Policy Studies (CMPS), based in the heart of government, the Cabinet Office, set up the International Comparisons in Policy Making Project in 2001. Part of the Project's brief was to develop evidence-based guidance for civil servants on how to ensure international policy transfer is conducted successfully. The result was, The International Comparisons Toolkit.

At the heart of the toolkit lies a 5 point plan: Scan, Select, Understand, Assess and Recommend. The great strength of the plan is the emphasis it puts on the need to understand the context in which policy in other territories has been delivered. The history of social policy transfers is unfortunately littered with examples where failing to understand context preceded policy implementation failure.
Size isn’t everything

Professor Nancy Cartwright, in her excellent book *Hunting Causes and Using Them: Approaches in Philosophy and Economics*, provides a great example from the field of education. The issue of class size and the impact it has on children’s learning has been a perennial issue for administrations across the globe. In a very well documented and robustly implemented evaluation, the US State of Tennessee demonstrated that reducing class size had a positive effect on learning outcomes for children. Impressed by the evidence, the State of California implemented a programme of reducing class sizes in the hope of reproducing the results for children. As with so much policy implementation in the US, the change was evaluated, but results showed the reduction of Californian class sizes failed to produce the same increments in children’s academic performance. Why had the transfer of policy, from one US state to another, not produced consistent results?

The answer lies in contextual differences between Tennessee and California. When Tennessee made the move to smaller class sizes, they had both the additional numbers of experienced teachers required, and the space in their schools to accommodate more classes. California had neither. As a consequence of introducing smaller class sizes, they had to recruit a cohort of newly qualified teachers, and utilise temporary classrooms in schools. The result was that despite reducing class size, the overall quality of teaching suffered as a consequence of using inexperienced staff and inappropriate teaching spaces.

Cause and effect

Understanding context then is a crucial element in extracting value from international comparisons. How is it done? The CMPS toolkit talks about reducing policies or programmes to ‘a simple model of key elements linked by cause and effect’. It’s what research people often refer to as developing a theory of change. A good theory of change helps to unravel the causal links between policy implementation and outcomes. Understanding those causal chains is really important to understanding the importance of context in international policy delivery. In the class size example, a theory of change would have helped uncover one of the important causal factors in producing the effect of better educational outcomes: the increased amount of quality time individual pupils received from teachers. With that explicit knowledge, it becomes easier to see that reducing the quality of teaching staff and classroom environment might offset any hypothesised gains from smaller classes. Put simply, theories tell us what questions to ask. That is what makes theories of change so useful to policy development and evaluation - they help identify the key contextual factors that underpin examples of good practice.
So, what kind of contextual elements should we look for when considering examples of good practice from other territories? Richard Rose, Professor of Politics and Director of the Centre for the Study of Public Policy at the University of Aberdeen, with funding from the UK’s Economic and Social Research Council (ESRC), has looked at this issue in some detail. He warns of the need to look at how the limits of available resources are likely to influence transferability, just as in the class size example. However, he also expects researchers doing this kind of comparative policy analysis to have some sense of the political sensitivities involved; what he calls ‘the politics of acceptable practice’.

**Public consensus**

The delivery of evidence-based policy has, to some extent, been bedevilled by a lack of enthusiasm on behalf of some of the research community to either understand or accept the political realities of policy development and delivery. Of course effective policy needs to be developed in full cognisance of the relevant evidence. But policy is rarely, if ever, developed solely on the basis of knowledge about what works. Policy change has to be politically acceptable. Whatever decision is made about the best option for policy, it has to be made on the basis of consensus between a range of stakeholders including politicians, the voting public, and expert opinion. Indeed, it could be argued that forming policy in the absence of the approval of the voting public is, almost by definition, undemocratic. Criminal justice policy in England and Wales is a case in point. No end of evidence has been produced by criminological researchers showing how ineffective some custodial sentences are in dealing with crime and criminal behaviour. With around 70% of those sent to prison coming out to reoffend, prison is often simply not a cost effective way of dealing with crime. Nevertheless, the political realities are that the public in the UK simply do not have the appetite for replacing custodial sentences with community alternatives.

**Different systems**

Criminal justice policy provides another good illustration of how context has to take more systemic considerations into account. Next to health and education, crime is one of the top issues that influence voting in the UK in ways that simply do not have the same resonance with voters in other countries. Despite, or perhaps because of that fact, political researchers are often asked to provide comparisons of global criminal justice systems. On the face of it, some of the comparisons are stark in the extreme. For example, around half of the old EU-15 countries have between 70 - 80 lawyers per 100,000 of population while others (including England & Wales) have more than 200. Similarly, according to the European Commission for the Efficiency of Justice, the legal aid budget in France is around £3 per capita,
while in England and Wales the figure is £34 per capita, ten times as much. However, we can only start
to make sense of these comparisons when we appreciate the differences between the adversarial
judicial system in England and Wales and the inquisitorial system in France. Most cases in France do get
to full trial; examining magistrates have the power to divert offenders into other parts of the system
before that stage. That saves a great deal of money on lawyers. However, the inquisitorial system
demands a trained, professional judiciary. That comes at a price, especially when compared to the
largely unpaid magistracy in England and Wales. The final reckoning is that the criminal justice systems
in France and England and Wales cost roughly the same, but because of fundamental differences, those
costs fall in different elements of the two systems.

The fact that systems vary doesn't make comparisons valueless, of course. On the contrary, the fact that
differences do exist can be of interest in itself. Comparisons of criminal justice systems across different
countries can uncover a wealth fascinating facts. For example, in Scotland, juries of 15 people can return
one of three verdicts: 'guilty', 'not guilty' or 'not proven'; Holland and Sweden, thought by many to be
the most liberal of European countries, do not have jury trials; and in the Czech Republic, women make
up 61% of the judiciary.

**Different political histories**

A fourth important element of context concerns political history; policy choices open to any government
are inevitably linked to what previous administrations have committed to. The history of social policy in
any country influences expectations among the electorate that set limits around the degree and
direction of change that would be politically acceptable. Nowhere has this influence been more evident
than in the development of health services in the UK. Because of the history around formation of the
National Health Service, successive governments have had to formulate policy change within the
constraints of providing a service that is free at the point of delivery. Other European governments have
been able to develop health policy without the same constraints.

**Data equivalence**

A final caveat to attach to the endeavour of making the most of international comparisons concerns the
more mundane issue of data equivalence. It is an unfortunate fact of life that whilst different countries
may choose to give elements of their data collections the same names, they are often not comparable.
Take European crime figures on theft. The standard definition of theft is ‘depriving a
person/organisation of property without force with the intent to keep it'. However, not all countries have the same counting rules: Denmark, Moldova and the Ukraine do not include theft from a motor vehicle in their figures; Hungary, Poland and Russia don't include theft where the sums involved are small; all countries exclude embezzlement with the exception of Albania, Bulgaria and Greece among others. Knowing those differences exist has an inevitable impact on interpretation of the figures.

* * *

Learning lessons from other countries was one of the key principles included in the UK Government White Paper, *Modernising Government* (1999). Our experience of providing evidence to support the development and implementation of policy suggests the principle is a good one. The trick to making international comparisons effective is getting the balance of effort right. It's not just a matter of tracking down examples of good practice; it is about taking the time to make explicit the theories of change that underpin good examples of policy and delivery, and then using those theories to identify the contextual factors likely to have an impact on how well those solutions are going to travel.