

ACTORS AND INSTITUTIONS IN THE POLICY PROCESS: THEORETICAL FRAMEWORKS AND EMPIRICAL EXAMPLE

/ THE CASE OF GERMANY, ITALY, US AND GREAT BRITAIN /

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Abstract

The theoretical problem analyzed in this research is the dependence of policy capacity of one of the main actors who reside within the state (the Elected officials) from one of the major characteristics of the Organization of the State (Intergovernmental Division of Power). The policy field in which this interaction will be analyzed is the administrative reform. The countries where these reforms are taking place are Germany, Italy, the United States and Great Britain. The reason for why exactly these countries will be chosen is to cover diverse patterns of institutional structures and historical backgrounds (two Anglo-Saxon and two European countries, two federations and two unitary states, two winners and two losers of the WW II).

The idea staying behind this research paper is that the potential for reforming different administrative systems is basically dependant on the general institutional context in which these systems are embedded. Based on this conclusion the paper is presenting comparative research of the institutional context in the covered countries and is analysing the way it described the administrative reform capacities of their political systems.

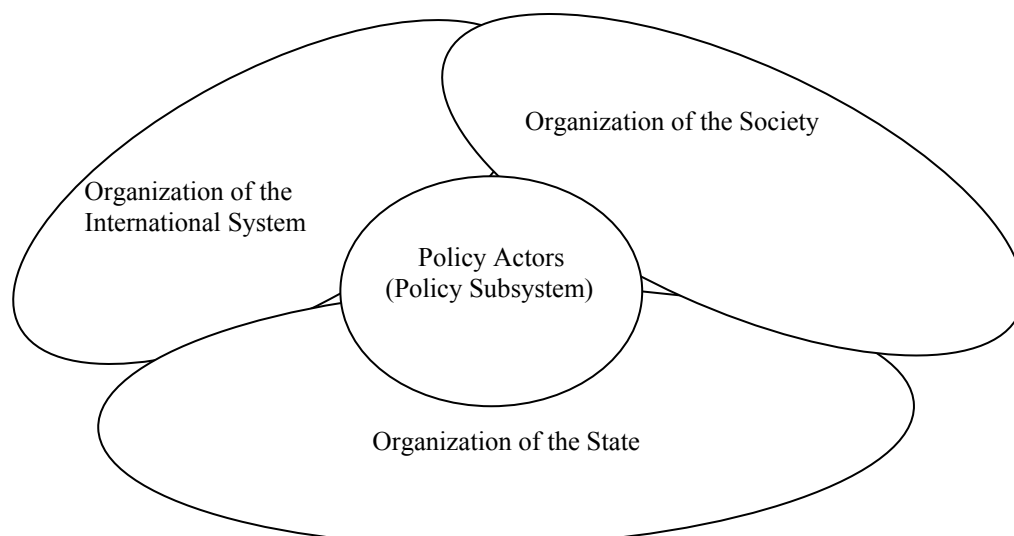
This comparative research will concentrate on the first factor that accounts for the limited capacity for administrative reform - the restricted scope for executive leadership. In this analyses the dominant approach to public policy, which is going to be used is so called Neo – Institutionalism

THEORETICAL FRAMEWORK OF THE RELATIONS BETWEEN POLICY ACTORS AND THE INSTITUTIONS

Which is the first? The egg or the hen? This century-long public debate resembles another debate in the political science: which is the more important factor in politics - the institutions or the actors?

Policies are made by *policy subsystems* consisting of actors dealing with a public problems. The term “ actor“ includes both state and societal actors, some of whom are intimately involved in the policy process while others are only marginally so. Policy subsystems are forums where actors discuss policy issues, persuade and bargain in pursuit of their interests. During the course of their interaction with the other actors, they often give up or modify their objectives in return for concessions from other members of the subsystem. These interactions, however, occur in the context of various institutional arrangement surrounding the policy process and affecting how the actors pursue their interests and the extent to which their effort succeed.

Figure 1; Actors and Institutions in the Policy Process



Source: Howlett, M. (1995), *Studying Public Policy – Policy Cycles and Policy Subsystems*, Oxford University Press. p. 51

Actors in the policy process may be either individuals or groups. The actors involved in a particular policy area can be referred to collectively as a 'policy subsystem'. The policy actors come both from machinery of the state and from the society at large.

For the sake of simplification, policy actors may be divided into the following four categories: elected officials, interest groups, research organizations, and the mass media. The first two reside within the state, the latter three in the society, together they form the principal elements from which members of specific policy subsystems are drawn.

The *institutions* can be defined narrowly as the structures and the organization of the state, society, and the international system. Institutions shape actors' behaviour by conditioning the latter's perception of their interests and affecting the probability of their realization by constraining some choices and facilitating the others. Even more significantly, some institutional arrangements are believed to be more conducive to effective policy-making and implementation than the others. While not monolithic, omnipresent, or immutable, institutions cannot be avoided, modified, or replaced without considerable effort.

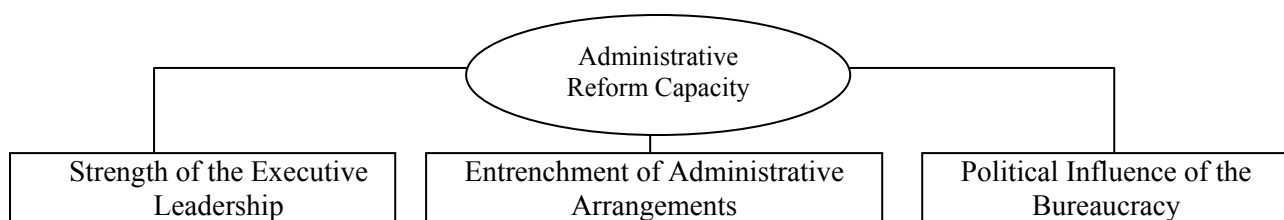
As an answer to the introductory question of the paper we can say that both actors and institutions play a crucial role in the policy process. Individuals, groups, classes, and the state participating in the policy process uncouthly have their own interests and the outcome of their efforts are shaped by institutional factors. However, there is no way of predicting in advance which one is more important at a particular moment. We must, therefore, consider both, leaving it to the empirical analysis to reveal the relative significance of each in specific circumstances.

In this paper my attention will be focused on one fragment of the theoretical framework, which will be analyzed through empirical examples in defined policy field¹. The *theoretical problem* is the dependence of policy capacity of one of the main actors who reside within the state (the Elected officials) from one of the major characteristics of the Organization of the State (Intergovernmental Division of Power). The *policy field* in which this interaction will be analyzed is the administrative reform. *The countries* where these reforms are taking place are Germany, Italy, the United States and Great Britain. The reason for why exactly these countries will be chosen are to cover the state structure, which represents diverse patterns of institutional structures and historical background (two Anglo-Saxon and two European countries, two federations and two unitary states, two winners and two losers of the WW II).

The idea staying behind this research paper is that the potential for reforming different administrative systems is basically dependant on the general institutional context in which these systems are embedded. Based on this conclusion the paper is presenting comparative research of the institutional context in the covered countries and is analysing the way it described the administrative reform capacities of their political systems.

In the specialised literature we can find three factors that describe the administrative capacity for reform - Strength of the Executive Leadership, Entrenchment of Administrative Arrangements, Political Influence of the Bureaucracy. (Knill, 1999)

Figure 2; Factors Describing The Administrative Capacity For Reforms



This comparative research will concentrate on the first factor that accounts for the limited capacity for administrative reform - *the restricted scope for executive leadership*.

¹See Annex 1

EMPIRICAL FRAMEWORK OF THE RELATIONS BETWEEN POLICY ACTORS AND THE INSTITUTIONS

In this analyses the dominant approach to public policy, which is going to be used is so called *Neo – Institutionalism*. It is one of the three general sub-types of deductive approach. The main characteristic of the *Neo – Institutionalism* is that it acknowledges the crucial role of institutions in political life. In its perspective institutions themselves are the products of human design, the outcomes of purposive actions by instrumentally oriented individuals. Following this approach I will start with brief analyses how the historical background shaped the institutional framework of the covered countries.

• Historical Background of the Recent Institutional Frameworks

In order to achieve a deeper understanding of the political system of the Federal Republic of **Germany** one should always have in mind the 20th century history. The contemporary German state is a continuing testament that the lessons of the past have been learned. The rise of Hitler to power in 1929 was seen mainly as a consequence of the absence of constitutional safeguards. That 's way prioritisation of the political consensus that has been evident throughout post—war German history was of paramount importance when the Basic Law being drafted in the late 1940. As such, the German constitution was written with the clear intention of avoiding the mistakes of the past.

The case of **Italy** is quite similar to the German one. Just like as its wartime ally Italy had a lot of history lessons to learn. The Constitution, which has been the subject of almost non-stop debate since its ratification in 1948, was the product of a reaction to the politics of the Fascist Regime that it replaced. The creators of the post-war Italian republic, like their German colleagues, were concerned to create a political system in which power was dispersed as widely as possible to prevent any one organisation or individual gaining control over state apparatus. To this end the Constitution created a series of checks and balances.

The case of **United States** is from one side quite different from the two briefly described above – they were a winner of the WW II and they didn't need to change their political system. But from the other side the US state system is formed after the War for Independence and it is reflecting the will of the founding fathers to secure a political system that allows settlers freedom from a dominant repressive government. As a result of this wish the founding fathers elaborated the world is most famous system of checks and balances. The other important factor, which shaped the form of the US state institutions and public administration is the fact that they are effectively the spiritual home of capitalism. A successful economy needs complex regulations to avoid the creation of powerful exploitative monopolies and fraud. A successful economy also needs complex economic infrastructure and a substantial army to defend its interests home and abroad. The US has, therefore developed a highly complex government system and administration in order to police its freedoms and regulate its democracy.

In **Great Britain** the political culture has been marked by a high degree of continuity. History has never seen a popular revolution. The architecture of the modern state was drawn largely in the nineteenth century, when the rising industrial bourgeoisie sought a means of supporting the emerging capital economy. The reconstruction that followed the Second World War added a new layer to the modern state with the creation of a comprehensive welfare state, including the NHS, and the nationalisation of a number of major industries in the form of public cooperations.

In the political realm, under the *Neo – Institutionalism* perspective, institutions are significant because they constitute and legitimise political actors and provide them with consistent behavioural rules, conceptions of reality, standard of assessment, affective ties, and endowments, and thereby with a *capacity for purposeful action*. So, keeping in mind the dependence of the potential for reforming different administrative systems from the general institutional context in which these systems are embedded I will proceed with an analyses of one concrete element of this context - the executive leadership.

There are few institutional characteristics, which can be pointed as an institutional veto points towards the strong executive leadership (like in the case of Germany) or on contrary, as factors describing the strong executive leadership (like in the case of GB).

These institutional characteristics are: the structure of the state, the role of the party competition, the role of the judicial review, corporatists or pluralist tradition, and the organisation of government.

- **Structure Of The State**

One of the most important factors affecting a government's capacity to make policy is whether it has a federal or unitary form of government.

Quite important characteristic of the **German** federal system is the functional division of labor between the federal government (*political competencies*) and the *Lander* (*implementation competencies*), i.e. separation between politics and administration. Although, there are strong interlinkages of policy making between the federal and regional level. As the opportunities for federal administrative guidance and control of the *Lander* is restricted to a low number of constitutionally defined cases, intergovernmental co-ordination has to be reached by negotiations between autonomous bureaucracies. The distribution of legislative competence at federal, state and local level was a conscious decision taken at the end of the Second World War to avoid the over-centralisation of political power that had facilitated Hitler's rise to power. Such a structurally and procedurally interlocked system is not conducive to comprehensive reforms and institutional innovations.

The Federal Republic of Germany has a bicameral parliamentary system and legislation is required to pass through the upper (*Bundestag*) and lower (*Bundesrat*) Parliamentary chambers. The *Bundesrat* provides a forum for state representation at the federal level. So the upper chamber resembles to some extent the US Senate. The sixteen states have between three and six seats in the *Bundesrat* depending upon the population size, although, as in the US, this rough approximation leads to obvious distortions.

According to the Basic law the state operates under the principle of subsidiarity similar to that which is now adopted by the European Union. Thus, power is allowed to devolve down to the unit of the government closest to the people which can effectively undertake a particular task.

Actually long before the European Union was to adopt this concept the culture of subsidiarity was developed in the **United States**. Two basic elements of the separation of power that characterise US liberalism are the division between federal and state governments and the independence of the local government sector. Support for the state community rights stems from Madisonian concern to prevent domination of the nation by a single powerful dictator. (Madison, 1961) The tenth amendment of the Constitution firmly established that the states are responsible for governing their territories on all matters not reserved by the Constitution to the federal government. The early nineteenth century French political writer Alexis de Tocqueville observed that the basis of liberty in the US lay in the independence and participative democracy at the heart of local government (Tocqueville, 1956). But it is important to be noticed that over the last 200 years there has been a gradual erosion of the independent power of the states to the advantage of the federal government through the power of the federal pursue and favourable rulings from the Supreme Court.

The task of authoritatively determining the laws of the federal government rests with the legislature that is collectively termed the Congress and is divided into two Chambers: the House of Representatives and the Senate. The House of Representatives is elected every two years and its members represent single member constituencies of roughly equal populations. The Senate represents the states, each of which has two senators. Those 100 senators are elected for six years and every two years a third of the Senate is due for election.

The Constitution gives identical powers to both of the two Chambers. So, in order for the representatives of the States (the Senators) to have a strong influence over politics the legislative process requires that any proposal pass through the Chambers. If either of them does not agree on a bill it will not become a law.

The existence of a federal system significantly affects the capacity of state officials to deal with pressing issues in a timely and a consistent fashion because the reforms in the public administration are made and implemented by the national/central as well as state/provincial governments. Federalism has been cited as a major reason for the weak capacity of the governments in Germany, US, Australia and Canada. It has constrained these states' capacity to develop consistent and coherent policies.

The idea of subsidiarity recently has been developed in **Italy**. Legislation introduced in 1997, the first of three laws aimed at streamlining the administrative system and named after the sponsoring minister Franco Bassanini, has sought to transform the relationship between the central and the local government by reversing the historical division of reserved powers. Instead of listing the functions which were specifically attributed to the local government and reserving everything else for the central government, the so-called Bassanini I Law stipulates that only the functions

specifically allocated to the central government remain there, everything else is performed by the regional or local governments. This reverses the logic of the relationship between central and local government and makes the concept of subsidiarity the guiding principle of future central-local relations.

A system of 20 semi-autonomous regions were established, which, although falling short of full federalism, provided for a significant degree of regional autonomy.

Although **Britain** doesn't have a Constitution it does not mean that there are no laws affecting political practices. Conventions, customs and traditions have, on the whole played a major role; although that role itself is not a fixed one.

Strong executive leadership emerges first from the Centralisation of the political power within a unitary state structure. Since the UK, unlike Germany knows no constitutionally-entrenched guarantee of local self-government or regional autonomy, local authorities and regions can have their powers rescinded at any time by a simple parliamentary statute. Furthermore, there is no second chamber comparable to the German *Bundesrat*, which may serve as a channel for the regions and local authorities to advocate their interests in the policy-making process.

Thus, there are no particular institutional hurdles preventing public sector reforms as, for instance, the two-third-majority requirement for changes to the German constitution.

- **The Role Of Party Competition**

Giving the institutional fragmentation of the **German** state, party competition has not become the dominant mechanism of political leadership. In contrast to the Westminster model with its tendency for strong party governments, a German government supported by a Bundestag majority find itself tied into a complex network of institutions and organisations where decision-making by bargaining is often the norm. Hence, in Germany, party competition is to a lesser extent a vehicle of political leadership than a co-ordination mechanism in the fragmented institutional structure; between the federal and regional governments as well as between different regions.

The impact of party competition in promoting strong executive leadership is furthermore restricted by the German electoral system, which in many instances leads to the establishment of coalition governments. Thus, the scope for comprehensive reform decisions is additionally reduced, given the need for compromise and bargaining between the governing parties.

Although the executive leadership in the **US** could be considered as a strong one, it is often quite possible that the President is not the leader of the party, which has the majority in the Congress because of the character of the US party system. That's way the executive often has a difficult task convincing the Congress to approve its measures. The Congress is autonomous of the government constitutionally as well as in practice, which explains why the President must strike bargains with the legislature or risk defeat, irrespective of whether his/her party holds a majority in the Congress.

One of the most influential ways for the Congress to obstruct the President is through the voted budget. In addition to the legislative function the Congress has also responsibility of checking the activities of the executive.

The fragility of the political executive in **Italy** is reaching much higher extend. Since the creation of the Italian Republic in 1948, Italy has had 57 governments, giving each a life expectancy of a little over 300 days.² To some extent this record is a result of the electoral system, which was based upon strict proportionality combined with party lists. In order to change this tendency the Italian parliament changed the electoral system from a proportional to a majoritarian. Albeit this change governmental stability remains a distant hope.

In **Great Britain** the party competition is the only mechanism for the legitimatisation and control of executive leadership, given the absence of any formal limits on governmental activity, as provided by the *Rechtsstaat* and federal separation of powers in the German case. The scope for executive leadership therefore depends almost exclusively on the extent to which a government can rely on the support of its parliamentary majority. There are indeed few checks on the executive to launch administrative reforms in this type of Parliamentary systems (like also Japan, Canada and Australia) as long as the government enjoys majority support in the legislature.

² There were 25 Prime ministers in Italy during this period comparing with 7 Chancellors in Germany.

The existence of strong majorities is, on the other hand, facilitated by the strict majoritarian electoral system, which favours the emergence of stable and powerful one-party governments.

- **The Role of the Judicial Review**

The role of the judiciary in the policy process varies according to the nature of the countries' political institutions.

A third institutional veto point in **Germany**, which restricts the scope for executive leadership, emerges from the *Rechtsstaat* principle which implies that the parliamentary legislation is subject to judicial review by the Federal Constitutional Court as to the constitutionality of the legislation in question. Hence, the Court offers an important possibility to modify or block governmental reform initiatives even after they have been accepted by the parliament. In this respect Germany is far more similar to France and Italy than to Britain because specific administrative courts, rather than the Parliament, are seen to be the principle means of holding the administration to account.

In **Italy** a Constitutional Court was created to ensure that legislation was in conformity with the requirements of the Constitution. The constitutional provision of *abrogative referenda*, that is, referenda the object of which is to modify or remove the existing law, was designed to ensure that even decisions which passed the scrutiny of the Constitutional Court could be challenged by the ordinary citizen if he or she could collect the necessary amount of support. Constitutional guarantees of judicial autonomy had the potential of providing checks on the behaviour of administrators and politicians.

In the **US** following the American Revolution, natural-law principles of sovereignty which had informed the British legal thought were replaced by the principles of natural rights and of the constitutional supremacy. One demonstration of this was the division of powers so characteristic of the American system of government. Another less obvious manifestation was the refusal of the American judiciary to subordinate itself to either Congress or the executive, and to insist upon its own role in determining the legality of laws and regulations of all kind, including those enacted or promulgated by the other two branches of government.

According to the analysed principle, the US are again closer to the above-mentioned countries than to Great Britain. This is a result of a quite strict system of checks and balances. The third element on the federal separation of powers, the Judiciary culminates in the constitutionally established Supreme Court. The Court has the power to interpret the exact meaning of the Constitution.

Generally speaking, judicial autonomy and assertiveness complicate policy-making and erode the state's policy capacity to a greater or lesser extent.

British practices (which differ substantially of these in the US) developed out of efforts to control local governments on the part of central officials under the monarchy. Many of these efforts were, of course, resisted by the local populace, both commoners and nobles. However when the Parliament replaced the monarchy as the source of central political power the same principals of judicial review which had been the symbol of despotism became a symbol of democratic government.

Given the role of the parliament as a sole authority to adopt or reject laws, and the absence of a written constitution, Britain knows no judicial review subjecting the laws passed by the legislature that would scrutiny their constitutionality. Whereas in Germany parliamentary legislation might be subject to judicial review, in Britain the parliament is regarded as the highest court in the land. Hence, in Britain, the opportunities to block governmental activities through the courts are rather slim.

The absence of a comprehensive system of legal rules guiding the organisation and operation of the public administration means that the government has considerable flexibility to adapt these conditions when advancing administrative reforms. The lack of detailed and tightly coupled rules guiding administrative practices and procedures significantly reduced the institutional cost of administrative change and permits policy-makers grater room for manoeuvre.

- **The Level of Autonomy**

Autonomy refers to the extent of a state is independent from self-serving and conflicting social pressures. Observers of politics have long argued that the self-serving motives and actions of groups benefit their members at the expense of the rest of the society.

The roots of the *Corporatism* theory extend back to the Middle Ages when there were concerns about protecting the "intermediate strata" of autonomous associations between the state and the family. These includes guilds and other forms of trade associations as well as, religious organisations and churches. Corporatism can be defined as a system of interest intermediation in which the constituent units are organised into a limited number of singular, compulsory, non-competitive, hierarchically ordered and functionally differentiated categories, recognized or licensed (if not created) by the state and granted a deliberate representational monopoly within their respective categories, in exchange for observing certain control on their selection of leaders and articulation of demands and supports. Under the corporatist theory, public policy is shaped by the interaction between the state and the interest groups or group recognized by the state.

The **German** tradition of corporatism implies important institutional and factual veto positions which limit the scope for strong executive leadership. The multitude of co-operative arrangement between public and private actors, as well as the delegation of powers to private associations, increase the government's need to bargain and accommodate various societal interests when formulating and implementing political reforms.

Pluralism can be defined as a theory in which multiple groups exist to represent their respective members' interests, membership is voluntary and groups associate freely with each other without state interference in their activities. Pluralism is based on the assumption of the primacy of interest groups in the political process. Politics in the pluralistic perspective is the process by which various competing interests are reconciled. Public policy is thus a result of competition and collaboration among groups working to further their members' collective interests.

Pluralism originated in the **United States** and continues to be the dominant perspective within the American political science. But pluralism's applicability to countries besides the US is problematic because of differences in political institutions and processes. British parliamentary institutions found in Australia, Canada or the United Kingdom, for example do not led themselves to the kind of open access that groups enjoy in relation to the Congress in the US. In America the active involvement of the members of the Congress in drafting bills opens up grater opportunities for interest groups to influence the policy process, the result of which may be diluted or even conflicting policies.

Opposed to the German tradition of corporatism, the political influence of British associations is basically dependent on the extent to which they are able to rely on informal contacts to the political-administrative system. Notwithstanding the general preference for bargaining and consultation, the British government appears to have considerable discretion in deciding not only which groups are included and excluded, but also in defining issues, which exclude any substantial group involvement or negotiation. This picture is in clear contrast to Germany where the idea of non-negotiable policies has seen less apparent.

The autonomy of the Italian government from self-serving motives and actions of interest groups is an issue of a serious concern. To some extent with this characteristic some of the authors are explaining the political crises in Italy (Spence, 2000). The crises of the political parties are described in terms of transformation of the parties from institutions devoted to the mobilisation of the electorate and the expression of ideological and political preferences to "machines for mobilizing, distributing and exchanging resources". This aspect of behaviour of the political parties is discussed in literature in terms of the process of "clientelism", the practice of powerful political figures using their control over the public resources to reward specific client groups within the society. This practice lays at the very foundation of the party system of corruption and patronage that infected every corner of the political system. The political class, preoccupied with the demands of maintaining clientelistic relationships had little time or inclination to raise their sights to focus upon the much needed political and institutional reforms.

Comparing to the other three cases, the nature of the relations between the government and the interest groups in Great Britain can be described as the most favourable environment for formulation and implementation of the laws concerning reforms in the field of the public administration.

- **The Organisation Of Government**

The organisation of government at the ministerial level in **Germany** contributes to the reduced scope of executive leadership. Apart from the necessities arising parliamentary coalition building, the *Ressortprinzip* (departmental principle) plays an important role in the context. Ministers, albeit to the "guiding principles", are the autonomous hierarchical heads of their departments. Thus, the ministers are fully responsible for their actions. So, there is a low inter-ministerial (horizontal) coordination, but at the same time there are developed inter-governmental coordination mechanisms (vertical coordination). Given the strong tendencies toward administrative segmentation favoured by this autonomy, the existing powerful executive leadership is much more difficult for the federal chancellor than for a British prime minister, who can rely upon the principle of ministerial responsibility. Some authors described this system as "a system of organized responsibility" (Banner, 1991).

Thus, the German political system is characterised by both fragmentation and decentralisation of political power, implying fundamental limitations on the government's ability to successfully formulate and implement comprehensive policy innovations and administrative reforms.

In **Italy** there is a Council of Ministers representing each of the departments of state and is presided over by the President of the Council of Ministers, the equivalent of the British Prime Minister. In reality however, cabinet government of the British model has never existed in Italy. Italian governments were and continue to be coalitions of often not very co-operative partners. The notions of collective responsibility for governmental actions are largely absent. Whilst the Council of Ministers and the President of the Council are in formal charge of government policy, most important decisions tend to be made by inter-ministerial committees formed by ministries having similar or complimentary responsibilities, which seek to co-ordinate the activities of the ministries. Many of these committees have been abolished in recent times in the attempt to speed up simply decision-making at the centre.

The US President being the chief executive is able in theory to arrange the structure of his government as he sees fit. Customs and practices, however, have created a framework of departments of which are under the control of the secretary of state who is, therefore the senior politician in charge of a particular area of responsibility. The weak and undisciplined party system in US ensures that the President once elected, has little need to select prominent rivals to senior offices of state. The Secretaries are often close confidants of the President. They form the cabinet and the President became its head. The body is usually less influential than its European equivalents. The President can and frequently ignores the advices of his cabinet and may often prefer the advices of aides appointed to his Personal office at the White House. Even the title "secretaries" shows the different attitude in the US political system comparing with the appropriate in Europe title "ministries".

It is important to be emphasised that the limitation on executive leadership emerging from these numerous veto points should not be confused with a restricted capacity to resolve political problems for which the institutional characteristics provide distinctive opportunities based on bargaining and consultation (especially in the case of Germany). But while these mechanisms might prove appropriate in dealing with emerging problems, they generally restrict the government's ability to formulate and implement comprehensive political and institutional reforms.

The strength of executive leadership in **Britain** can be traced to patterns of governmental organisation, namely the British doctrine of collective responsibility. The emphasis of the collective decision-making rather than departmental autonomy reflects only the constitutional requirement that the government stand united in parliament. It also reflects the belief that the work of the government can be carried out effectively only if it remains united and well co-ordinated.

At the heart of the executive core sits the Prime Minister. Although constitutionally *primus inter pares*, the position commands a formidable array of political resources. In recent times, both Thatcher and Blair showed themselves fully willing to exploit this potential.

The British political system facilitates strong executive leadership. Given the concentration and centralization of political power, which is typical for the Westminster model, British governments are to a lesser extent confronted with institutional veto points, implying the potential for more radical and comprehensive policy innovations is much higher than in the German *Verhandlungsemokratie*.

In the light of the strong capacity for executive leadership in Britain, the potential for comprehensive and encompassing reforms is considerable, assuming the corresponding motivation of its political leaders.

CONCLUSION

In the political science literature there are two quite used characteristics connected with the organization of the state – “strong” and “weak”. Considering the goal of this research to describe the dependency between actors and institutions in the process of the reforming the public administration, and trying to summarize the conclusions I will explore two different perceptions for these characteristics.

The countries covered in this competitive research can be ranked according to the strength of their executives and bureaucracy. Germany can be described as a country with relatively strong executive and the same time strong bureaucracy. Thus, we can suppose that the formulation and the implementation of the reforms in the field of the public administration will be a difficult and a slow process. The two Anglo-Saxon countries are characterized by strong executive body and weak bureaucracy. So, the executive leadership in GB and US has the required potential for launching the administrative reforms. Italy is represented by weak executive and at the same time weak bureaucracy. Considering the theoretical dependency between the natures of the executive and the bureaucracy we can expect middle adoption of the administrative reforms.

Figure 3; Ranking of Analysed Countries According the Strength of the Bureaucracy and the Executive

Nature of Bureaucracy	Nature of the Executive	
	Strong	Weak
Strong	Germany (weak adoption of the reforms)	
<i>Weak</i>	Great Britain & United States (complete adoption of the reforms)	Italy (mid adoption of the reforms)

The second approach to the two characteristics - “strong” and “weak” is connected with the already mentioned two dimensions of the organization of the state, which affect its ability to make and implement policies. They are autonomy and capacity. Autonomy refers to the extend of the state’s independence from self-serving and conflicting social pressures. “Capacity “ means the capacity to make and implement effective policies. Thus, states with political institutions that promote autonomy and capacity are described as “*strong states*” and those without such institutions “*weak state*”.

It is quite difficult to rank the analyzed countries according to this concept. It doesn’t sound quite appropriate when the researchers using this concept are describing US as a weak state (obviously considering the influence of the interest groups in the Congress) (Howlett, 1995). Following this logic and in combination with the conclusion illustrated in Figure 4 we can try to define the states covered in the research: Germany is a state with middle autonomy because of the strong culture of corporatism and mid capacity. Great Britain – strong autonomy (The government has discretion in deciding which groups are participating in the negotiations) and strong capacity. Italy – low autonomy from the influence of the interesting groups and self-serving interests groups and mid capacity for reform.³

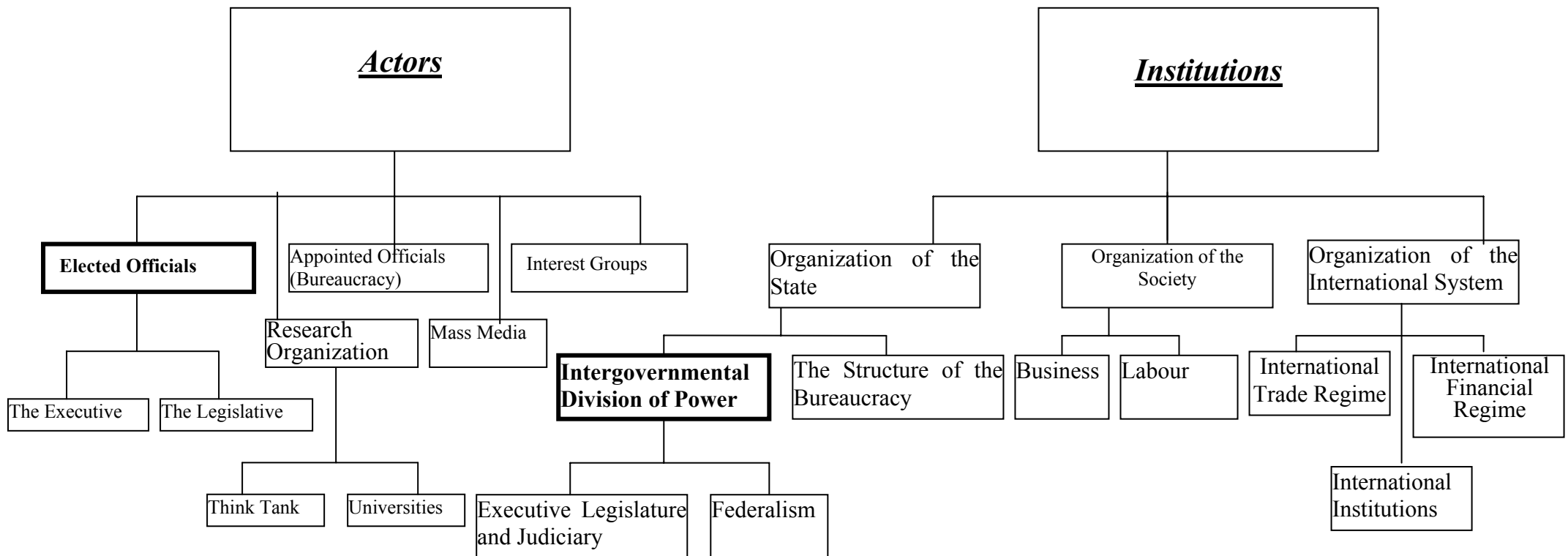
Figure 4; Ranking of the Analyzed Countries According the “Autonomy” and “Capacity” of the Executive

	AUTONOMY	CAPACITY
US	<i>Low</i>	<i>Strong</i>
GREAT BRITAIN	<i>Strong</i>	<i>Strong</i>
GERMANY	<i>Mid</i>	<i>Strong</i>
ITALY	<i>Low</i>	<i>Mid</i>

Although this attempt for some kind of ranking of these countries, which is illustrated in Figure 4, the author will sustain from describing them as a “weak” or “strong”.

ANNEXES

Annexe 1; Actors and Institutions in the Policy Process: Theoretical Frameworks*

* This scheme is based on Howlett, M. and M.Ramesh, *Studying Public Policy – Policy Cycles and Policy Subsystems*. Oxford University Press. 1995

Annex 2; Summary of the Characteristics Describing the Strength of the Executive Leadership

////////////////////	Germany	Italy	US	GB
Historical Background of the Institutional Framework	-Defeated in WW II - Necessity to learn the history lessons - Strong constitutional safeguards to prevent new authoritative governments came to power	- Defeated in WW II - Necessity to learn the history lessons - Strong constitutional safeguards to prevent new authoritative governments came to power	-The War for Independence against GB government and exploitation - Constitutional safeguards against repressive government - Strong debate about level of the decentralisation	-History has never seen a popular revolution. -The architecture of the modern state was drawn largely in the XIX c., when the rising industrial bourgeoisie sought a means of supporting the emerging capital economy.
Structure Of the State	-Federal decentralised -Strong local autonomy -Constitutionally guaranteed rights for the local authority -Subsidiary principle	-Decentralised structure - Relatively strong local autonomy - Constitutionally guaranteed rights for the local authority -Subsidiary principle	-Federal decentralised -Strong local autonomy - Constitutionally guaranteed rights for the local authority -Subsidiary principle	-Federal centralised - Weak local autonomy -Absence of constitutionally guaranteed rights for the local authority
The Role of the Party Competition	- It is not a dominant mechanism of political leadership - Coalition governments	- Fragility of the political executives (57 governments since 1948)	- Under disciplined party system - Often the president is not belonging to the party which has majority in the Congress	-It's the only mechanism for legitimatisation of the executive leadership -The strong parliamentary majority facilitated by the electoral system
Judicial Review	-The <i>Rechtsstaat</i> principle	-Constitutional Court which is ensuring the conformity of the legislation with the Constitution	- Supreme Court which is interpreting the exact meaning of the Constitution	-No judicial review subjecting the laws passed by the legislature - Parliament is regarded as the highest court in the land
The Autonomy of the Executive	- Strong traditions of corporatism - Multitude of cooperation agreement between public and private actors	-Reason for political crises -Base for a vast system of corruption and clientelism	-Strong traditions of pluralism -Open access to the Congress that the interest groups enjoy	-The government has discretion in deciding which groups are participating in the negotiations
The Organisation of The Government	- <i>Ressortprinzip</i> (departmental principle) -Low ministerial (horizontal) coordination -System of organised responsibility	- The government is coalition of often not very cooperative partners - Notion of collective responsibility for governmental actions are largely absent	-The title is not "minister", but "secretary of state" - The body is less influential than its European equivalents	-Strong executive leadership -Stable one party government -Doctrine of collective responsibility

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