

1. Anglo-American civil service systems: an overview

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The Anglo-American civil services cover two of the classic models of government administration and several smaller systems with reputations for innovative public management that have been influential internationally. The countries involved are identified with a specific administrative tradition and a distinctive reform agenda of the last 20 years, providing the rationale for a separate volume in the series *Civil Service Systems in Comparative Perspective*.

This volume examines five countries that have similar civil services and whose development pathways have been interlinked across three centuries. The primary purpose is to analyse key elements of each system in order to facilitate comparison. A country's civil service can be expected to reflect and illustrate an administrative tradition, but it can also be exposed to fundamental challenges that affect central features of the service. An important facet of this study, therefore, is how these civil services have responded in an era of reform.

The second focus is on the reform pattern associated with these countries, which has been highly distinctive compared with those in other OECD countries. The Anglo-American countries under discussion have invested heavily in reform during the last three decades – and longer if earlier initiatives are counted. The reform dimension has been accorded prominence because it has become a dominant feature of civil services internationally in the last 25 years, especially in the countries featured here. Indeed, several of them are regarded as the most active reformers in the OECD and as the chief purveyors of a distinctive reform paradigm, known as 'managerialism', or 'new public management' (NPM). This volume reviews the results of the reform era for a set of countries that have reformed extensively but are now reassessing the results.

A number of questions arise about country pathways and where they lead, about the reform patterns and how they relate to tradition, and about the impact on the civil service of a period of great change. These serve to indicate the interrelationships between the two dimensions – an evolving civil service and major public management reform.

The origin of this study is a comparative research programme first devised in the early 1990s and resulting in its first phase in a collection that explored theory, concepts and indicators (Bekke et al. 1996). For the second phase, the Comparative Civil Service Research Consortium developed a protocol for analysis of national civil service systems for a conference held at Indiana University in 1997. Four 'regional' volumes (including this one) and one overview collection on comparative civil service systems have resulted from this ambitious project.¹

THE SPECIFICITY OF ANGLO-AMERICAN SYSTEMS

Unlike the other regional volumes in the series, this one covers countries that do not form a geographic region. The grouping represents countries dispersed internationally between hemispheres and continents, rather than linked by regional location. There is a geographic element in that the volume deals with two pairs of contiguous countries (ignoring water boundaries): Australia and New Zealand, and Canada and the United States. The UK might be paired with Ireland (which is discussed in the Western Europe volume – see Millar and McKeivitt 2001) or otherwise regarded as playing the 'mother country' role.

The five countries considered in this volume form a coherent set by way of a common tradition and historical and continuing close associations and interactions. The 'old Commonwealth' – or the 'Westminster democracies' – forms a natural group of industrialised democracies with institutional roots in the British tradition. The Anglo-American group of countries is regarded as reasonably homogeneous for analytical and comparative purposes. The assumption is that this comparability results from a shared heritage, even though the countries are in many respects heterogeneous (Peters 1998, pp. 38, 74–5; Campbell 1983).

One can envisage the relationships at two levels, the broad including the United States and the narrow excluding it. We are thus dealing with two groupings: the Anglo-American and the Anglo-Saxon (or Westminster) – the only difference being the omission of the United States from the latter – although use of these categories is often loose. There are two divergent interpretations of the core features of the US system in relation to other democracies such as the UK: one emphasises the similarities and accordingly categorises the system as Anglo-American; the second focuses on the differences (Lijphart 1984, pp. 32–3).²

One of the main differentiating elements has been the lack of a well-developed concept of the state in the Anglo-American tradition. This produces the contrast between the 'stateless' tradition of these systems and the 'state' tradition of Continental Europe. Although this contrast is perhaps not as stark as some representations of the differences (Dyson 1980), there is nevertheless a

strong basis to the idea of the state and its autonomy from society in countries such as France, whereas a more fluid view of the relationship between state and society has existed in Britain. For the US, the state's connection with society is arguably stronger than in the other countries. In particular, there is the exposure of a professional civil service overshadowed by term political appointees who, as external citizens, could be seen to reflect and reinforce the lack of autonomy from society (Laborde 2000; Wilson 1998).³

Observers of Continental Europe who are sensitive to the existence of different state traditions recognise the Anglo-Saxon category as distinct and meaningful, whereas others may simply focus on the Westminster system or model (Aucoin 1995; Lijphart 1984).⁴ This would normally be the group included here – Australia, Canada, New Zealand and the United Kingdom, and possibly stretched to include the United States.

There are, then, several interrelated ways of approaching these countries. The narrow view focuses on Westminster (or the Commonwealth where the central Westminster principles prevail) – in particular, the fusion of the executive and the legislature under this form of responsible government (alternatively, and more accurately for some purposes, there is the less well known Whitehall model; see Campbell and Wilson 1995). The broader position covers countries with derivatives of the British tradition.

VARIATIONS WITHIN ANGLO-AMERICAN SYSTEMS

From the outside the commonalities may look strong, but within this Anglo-American group there are wide variations. First, there are different ways of examining the governmental institutions: three are federal systems and three (including Ireland) are unitary systems. Presidentialism is represented by the US, in contrast to the parliamentarism of the others.

In terms of fundamental features of the civil service systems, there are variations between the traditional open (US) and closed models of recruitment, the associated role of the career service, and modes of accountability. They also have different-sized public sectors (relative to GDP), with those in Australia and the United States being relatively small, the rest falling in the middle range for the OECD. The breadth of the spectrum is most obvious in political-bureaucratic relations: the UK lies at one end, with strong separation of the two realms; the US lies at the opposite end, with a mix of political and professional appointments. The United States remains unique in some respects, and neighbouring Canada occupies something of an intermediate position between its North American neighbour and the others.

The claims of the United States' 'exceptionalism' should be recognised but not overstated. Its governmental institutions are unusual and they have

consequences for public policy. The nation is notable for a civil service that is denied a significant policy role in government and for its reliance on external political appointees. There are good reasons for accepting the argument that the US system is different but not comprehensively unique (Wilson 1998).

COMMONALITIES AND IDENTITY

Beyond institutional traditions, a number of factors continue to reinforce the identity of the Anglo-American group. The patterns of interaction – historically formed and culturally supported by language and heritage – are very important. There has been a long tradition of studying the export and transfer of British institutions, within the Empire and the Commonwealth, and sometimes more systematic and comparative research into Westminster countries. The prestige of the Westminster model, which is often conflated with British politics, has fluctuated, with a peak in the 1950s followed by a slump that mirrored British decline (Wilson 1994). British researchers turned inwards, the level of interest abating further with the transfer of interest to the growing significance of the European Community.

The endogenous influences on members of this group came through two channels: networks and bilateral relations between countries. The formal networks derive from relationships developed between Britain and its colonies and maintained during decolonisation. The Commonwealth has provided a key channel of communication between members, the most coherent being that based on Canada, Britain, Australia and New Zealand. This had its basis in a common language, cultural legacy and institutions, and it forged connections of great strength, at least until relatively recently. The networks have had two operating features: meetings of civil service elites and staff exchanges between members. Examples are the active relations between central agencies (for example, civil service commissions) and between line agencies (for example, social security) (Halligan 1996).

Location and institutions also play a part. The antipodean countries of Australia and New Zealand have closely linked pathways (Castles et al. 1996), and Canadian development has reflected that nation's proximity to the US (Savoie 1999), although both pairings involve at least one significant difference in governmental structures. The combination of federalism and Westminster has linked Canada and Australia (Alexander and Galligan 1992), whereas unitary government has produced a special bond between Britain and New Zealand (the latter depicted as the perfect example of the Westminster model – Lijphart 1984, p. 16).

One question in transfer patterns concerns countries' propensity to look externally and their preparedness to borrow others' innovations. Some

countries – notably Britain and the US – have been absorbed in their own traditions and have traditionally operated as repositories of a distinctive form of government that exports institutions and is relatively impervious to external influences (although they have long maintained a peer focus). Small nations such as Australia and New Zealand have been more externally oriented, perhaps because of colonially induced reactions and an inclination to scan automatically the experience of larger kindred systems and the broader international environment (Halligan 1996). The age of reform has been something of a leveller in this regard: all the countries in this group have studied each others' reforms, and their borrowing pattern has exhibited endogenous features. Recent history has provided a fillip to group identity, since this reform solidarity has contrasted with the position in other OECD countries.

CIVIL SERVICE REFORM AND REAFFIRMING GROUP DISTINCTIVENESS

During the 1980s and 1990s civil service reform had one of its most active periods internationally in the 20th century. Administrative changes of great magnitude occurred, many of them seemingly irreversible; reform was rediscovered as viable and even effective. For a number of OECD countries the main indicator that things were different was that the character of the reform was comprehensive, in contrast to the incrementalism of the past. Despite substantial variations between countries in the process, type and impact of the reforms, there were strong similarities between some programmes (Halligan 2001).

These similarities were especially apparent among Anglo-American countries, with parallels being drawn between the UK, the US and Canada (Pollitt 1990; Savoie 1994) and with Australia, Canada, New Zealand and the UK being grouped because they more explicitly adhered to precepts of what was called 'new public management' than other OECD countries (Hood 1996). At the peak of the OECD's fixation on NPM, the Anglo-American experiments were upheld as the ideal (OECD 1995).

The emergence of this distinctive pattern of reforms and the resemblances between reforms in different countries raise the question of a connection between these developments. It was not coincidental; rather, it was the product of a pattern of interaction that accorded legitimacy and relevance to initiatives from countries of the same administrative tradition, and facilitated rapid transmission and acceptance of ideas and practice. The reforms became identified internationally as new public management – involving a somewhat imprecise (and changing) ensemble of reforms – and, in a less flattering way, as the

English disease or Thatcherism, it being British writers who first identified the emerging trend (Pollitt 1990; Hood 1996). In addition to the major reforms in Britain (for example, privatisation, executive agencies and the citizens' charter), individual country programmes gained international significance; here, the New Zealand 'public management model' and the 'reinvention' of the United States are of particular note. The reform movement therefore served to reinforce the notion that the Anglo-American group within the OECD was distinctive and different.

ANGLO-AMERICAN CASES

Each of the country chapters in this volume examines key features of the civil service from the standpoint of interpreting the directions taken by the system. Before this, the context is established in Chapter 2 by Guy Peters, who develops the notion of administrative traditions as having advantages over alternative concepts. He is also able to identify an Anglo-American tradition. His preliminary specification of the dimensions of traditions provides a means of comparing similar systems and of explaining why reform acquired prominence in these countries.

Britain has been a leader in civil service change for 150 years, playing at several points a pivotal role that has strongly influenced the other Anglo-American systems – and often other systems too. In Chapter 3 David Richards examines the impact of the structural, personnel and cultural reforms of the last 30 years. He argues that, despite the magnitude of the changes, the constitutional framework has provided the parameters for the reform process. The British case is best interpreted in terms of path dependency, which has produced evolutionary change emanating from the rare occasions of major reform historically.

The Australian chapter (Chapter 4) focuses on those traditional boundaries around the public service that have been subjected to extensive change. Three important changes are explored: the internal reconstitution of the Australian public service; and the reformulation of two key external relationships – between the public and private sectors and between the political executive and public servants. The evidence suggests that Australia has in some respects moved further from a traditional model than other 'Westminster systems' but that traditional conventions continue to provide constraints.

New Zealand is best known in this context for its public management model in the 1990s, although it has become apparent that this reform may have been but a phase contrasting with the nation's earlier public service history and what has succeeded the experiment. In Chapter 5 R.C. Mascarenhas examines the public service's adaptation as modernising proceeded subject to the interaction

between generic influences, particularly from Britain and indigenous forces. The radical reforms failed to be institutionalised in a small and economically vulnerable society, eventually resulting in a U-turn.

In Chapter 6 O.P. Dwivedi portrays the Canadian case as one that has evolved its own distinctive culture, characterised by possibly the most hybrid features of the Anglo-American group. It is a highly innovative system – and one that first recognised the management approach four decades ago – but it can also be seen as less committed to management reform if judged by its mixed record in implementation at the national level. Nevertheless, it has produced a distinctive public service that contrasts in interesting ways with the others.

The United States has been somewhat on the margins of this group since the 19th century, but always connected. This is the system with the longest commitment to management in the public sector; it is also one that has been less successful in following it through. In Chapter 7 Patricia Ingraham and Donald Moynihan analyse the US civil service and its capacity for change under divided government. They take as a starting point Aucoin's (1995) depiction of the United States as a 'laggard' to examine why this is the case and the fate of the reinvention of the National Performance Review in the last decade.

The concluding chapter reviews several central dimensions of the civil service based on the framework for the Civil Service Research Consortium, and draws out some of the contrasts and convergences among the various systems. Several questions emerge:

- the question of balance in the redesign of civil services in the medium term;
- the role of countervailing pressures to radical departures that exert influence to produce path-dependency tendencies;
- the extent to which these civil services have significantly changed over time.

The ascendancy of the political executive is apparent in the US, which has moved towards heavy politicisation in the post-war period, and in Australia and the UK, where the role and influence of political advisers have become more central.

Another set of questions centres on the long-term meaning and impact of reform and the durability of administrative and state traditions. The chapter concludes with reference to contemporary issues that may suggest future directions for the civil service: whether boundaries should continue to exist or be ignored and a renewal of arguments for strengthening the identity of the civil service.

NOTES

1. The other three regional volumes cover Asia, Western Europe, and Central and Eastern Europe (Burns and Bidhya 2001; Bekke and van der Meer 2001; Verheijen 1999). The overview was produced by Perry (1999).
2. The connections between the US and the UK have been made in other ways, one comparative text regarding them as part of the 'civic culture' (Heady 2001).
3. The revival of interest in the role of the state is a reminder that Anglo-American systems exhibit the components of a state, even if they are not strongly developed.
4. It is reportedly 'fashionable to treat Britain and the United States as part of an allegedly "Anglo-Saxon" category in comparative politics', a category for countries with low levels of social protection (Wilson 1998, p. vi).

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