Modeling the Role of Culture in Policy Transfer: A Dynamic Policy Transfer Model*

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Abstract: Anticorruption policy transfer has been discussed for decades, but the influence of culture in target countries has not received comparable attention sufficient to explain the lack of progress in reducing corruption in those countries. The conceptualization of culture so far has provided only a limited tool for developing a dynamic theory of policy transfer. We propose a bottom-up model of dynamic policy transfer that takes into account the cultural context in target countries. We first define culture as a set of values that are consistent with each other but that also conflict. We then develop a dynamic policy transfer model that revises the traditional model by considering the proposed concept of culture. Finally, we discuss the practical implications of the model, emphasizing the importance of knowledge of culture at the local level, where a bottom-up implementation of anticorruption policy takes place. We conclude by suggesting strategies for empirical research and specific implications regarding the Korean policy context.

Keywords: anticorruption policy, dynamic policy transfer, culture, culture adaptive policy initiative

INTRODUCTION

There is no country in the world where its citizens consider it appropriate that those governing enrich themselves at the expense of the governed (Dalton, 2005). But this apparent global aversion to politically corrupt behavior, while stimulating

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unprecedented levels of uniformity in legal prohibition and severity of, as well as a definably standardizing global set of sanctions for it, has not resulted in a meaningful decrease in such behavior.

The problem of corruption has become an object of public policy debate and development around the world in the last fifty years as anticorruption policy has undergone a process of globalization and homogenization (see OECD, 2010). While legal and policy instruments against corruption have modernized, so have corrupt practices (Leiken, 1996). Although policy seems to have proliferated and homogenized, actual public management around the world has not been responsive, or accountable to, public interest, public opinion, or general norms of professionalism and rationalism (Kim, 2008). In fact, a dual-track policy evolution appears to be emerging, and may best be observed at two levels, the global and local.

Global and local levels of addressing policy innovation and transfer chiefly diverge at the nation-state boundary. As our gaze is drawn across national borders or upward to transnational entities, observation and analysis remains at the global level. Depending on the reader's paradigm, nation/state entities and boundaries are actual and consequential. Those lines certainly exist via geographic boundaries, information transfer (via mail and the Internet), and—most importantly—legal boundaries, where the laws of one state end and those of another(s) begin.

At the global level, standards and laws concerning political corruption are converging, proliferating, and homogenizing and by now have generated and distributed over five decades' worth of conditional international aid totaling hundreds of billions of dollars through the Bretton Woods global finance superstructure (de Sousa, 2010). It is at the global level where diplomats and national leaders meet, most often representing their nations in transnational organizations (the United Nations, ASEAN, G20, etc.), and discuss matters related to policy. Votes are cast and counted, and policies regarding political activity are promulgated. The global level of analysis also includes transnational civil society.

By contrast, the local level is best defined, for our purposes, as within the nation-state or province or county and includes county or provincial bureaucracies and governing institutions as well as civil society entities and actors. As stated above, the critical boundary is the nation/state demarcation. The local level is where sociocultural pressures take policy decisions and political behaviors in innumerable directions, many of them not responding at all in predictable ways to transnationally-drafted and agreed-upon policy declarations at the global level. This is where most political corruption takes place and where the pressures of the immediate social context speak more loudly than the laws far above at the global level. Despite unprecedented centripetal movement at the global level of convergence in

terms of legal proscriptions of corruption, a stubbornly and ironically persistent thread of corrupt behavior seems to remain everywhere (de Sousa, 2010).

Anticorruption policy transfer has been discussed for decades, but the influence of culture in target countries, in contrast to the formal institutions or policies, has not received comparable attention sufficient to explain the lack of progress in reducing corruption in those nations. More generally, scholars have argued that the simple model of policy transfer assuming a homogenous national context should be revised to account for empirical evidence of local adaptations of global norms (Huh, 2017; Mukhtarov & Daniell, 2016; Park, 2012; Stone, 2017). However, previous research has focused mainly on institutional arrangements and has not accounted for cultural elements and their influence on policy adoption. Moreover, there is much room for theoretical development regarding multiple actors' roles in policy diffusion or lesson drawing in adapting global policy norms to fit domestic cultures and practices (Benson & Jordan, 2011; Rose, 1991; Stone, 2017).

The purpose of this article is to propose a bottom-up model of anticorruption policy transfer that takes into account the cultural context in target countries in order to address the question of why some anticorruption polices are successfully transferred and others not and to assess what is necessary for effective policy transfer. We first propose a conceptualization of culture that is flexible enough to reflect local variability of cultural values and practices as an explanatory variable. We then propose a more dynamic anticorruption policy transfer model that can be built on that understanding of culture.

In the next section, we define culture, policy transfer, and the interplay between them. Then, we develop a model of policy transfer in which culture vigorously and inexorably exerts influence on policy formation, transfer, and implementation at many levels of analysis. In doing so, we discuss a competing values perspective demonstrating that national cultures are clearly not homogenous but are rather composed of many loosely-coupled, perhaps even competing sets of values. Following that, we develop a dynamic policy transfer model that outlines policy proliferation based on demand across nations and regions and evolving into a transnational or global consensus. Then, we highlight the need for what we term "culture-adaptive policy initiatives" that emphasize the sharing of knowledge generated by a bottom-up approach to policy transfer between the local and global levels. Finally, we discuss ways dynamic policy transfer might be framed in future empirical research and specific policy implications in the Korean policy context.

REVISITING CULTURE AND POLICY TRANSFER

Historical Overview of the Definition of Culture

Culture has been commonly defined as "an all-embracing constellation of norms, traits, and patterns that identify a society and distinguish its people" (Jreisat, 1997, p. 62). This definition is similar to that concept of culture which takes its cue from the fields of anthropology and cross-cultural psychology. Both the symbolic anthropological approach of Clifford Geertz (1973) and the structural, psychodynamic approaches that define and analyze organizations as cultures unto themselves are classified in this theme (Schedler & Proeller, 2007). This stream of cultural study argues that culture should be understood in its entirety, resulting in a relatively amorphous concept of culture that is difficult to deal with as a variable. Combined with specific methodologies such as ethnography, symbolic analysis, and investigations of beliefs, attitudes, values and norms, this approach tries to understand culture as a deep structure embedded in a society as a whole (Schedler & Proeller, 2007, p. 193).

Distinct from the anthropological perspective, Almond (1956) offered a fourfold categorization of political culture. Almond and Verba's (1963) famous Civic Culture redefined for comparative public administration and politics researchers the idea of political culture as basic individual value orientations toward political behavior. Almond's original four types of political culture (Anglo-American, Continental European, Pre-Industrial, and Totalitarian) was endorsed by Diamant (1960) as a focus for comparative public administration over general systems theory (e.g., Parsons, 1951) because it was more specific, and therefore more supportive of better-targeted operationalizations. Almond and Verba's (1963) concept of civic culture describes the interplay between satisfaction with one's life, with one's political situation, and trust in the general public. They saw both concepts as crucial to political stability, and culture as an independent variable that exerted force on democracy and administration through hierarchies of values as well as finding expression through different institutional forms.

These conceptual foundations may have some implications, then, for several rather dominant themes that have been observed by others in the study of policy transfer and diffusion, and the literature on corruption over the years. For example, many studies and opinion pieces in comparative politics and comparative public administration have used one form or another of political culture, as defined by Almond. Furthermore, Almond described concepts such as "attitudes toward politics", "political values", "ideologies", "national character", and "cultural ethos" as

"diffuse and ambiguous", whereas his later concept of "civic culture" had the advantage of at least attempting "logical distinctiveness and comprehensiveness." Diamant (1960, p. 110) cautioned that the use of the concept of political culture as articulated was "essentially static" and made "no allowance for change." Thus, political culture may have raised a few red flags even at that early juncture. Nevertheless, a great body of literature generated over the ensuing decades in comparative politics and comparative public administration has defined culture in political terms in the tradition of Almond (1956) and Almond and Verba (1963).

Conceptualization of Culture

Schwartz and Bilsky's (1987; 1990) contributions from the field of psychology inform another conceptualization of culture further in that their theoretical definition of values holds that cultural values "(a) are concepts or beliefs, (b) pertain to desirable end states or behaviors, (c) transcend specific situations, (d) guide selection or evaluation of behavior and events, and (e) are ordered by relative importance." (1990, p. 878). Schwartz and Bilsky found the same motivational types of values in seven different countries, concluding that the study of disparate world views from different cultures would yield markedly different value systems and associated political structures.

More recently in the field of public management, some major themes have emerged as identified by Schedler and Proeller's (2007) review of the various conceptualizations of culture: (1) It is desirable to view culture as *contextually* as possible—i.e., as an independent variable, whereas political actions and actions by public organizations might better be seen as dependent variables; (2) It is desirable to define culture as *specifically* as possible, describing specific boundaries while allowing for culture to remain at the contextual level; and (3) It is probably a smart thing to define culture in ways that allow observable culture to change and evolve as those who experience it change and evolve.

As a result, certain essential characteristics of the concept of culture seem to emerge: (1) Culture is one of a multitude of factors that affect policy formation and transfer; (2) Culture does not exert *total* control over the shape or success of policy initiatives; (3) Not all cultures are the same; and (4) Cultures at all levels of human experience change constantly, at various rates, for different reasons, and with many varied effects on institutional shape and function, policy formation and transfer outcomes.

Accordingly, it is necessary to establish some conceptual boundaries of the definition of culture that may prove helpful to the study of policy transfer. Specifically,

it is necessary to eschew a *reductionist* view of culture, that is, limiting culture to one or a few simple concepts without considering their place in time or context. It is also important to avoid a view of culture that is *determinist*—in other words, magnifying culture as a "master" force accounting for all variability, or observability, in political institutions and behavior in such a way that leaves no room for other sources of influence. In addition, a mindset of cultural *uniformity* that assumes that all cultures everywhere—including and especially political cultures—are essentially the same or converging toward a globalized norm should be viewed with caution. Finally, it is necessary to avoid a cultural *stasis* posture that prevents an appreciation of the possibility of cultures' abilities to change over time, at various levels, and in response to certain influences.

Accordingly, we define culture *as a set of internally coherent clusters of values, beliefs, norms and attitudes, in which clusters can be loosely or tightly coupled, as well as conflicting with other clusters*. Adopting this view of culture, especially in view of what can be described as a trend toward the globalization of policy against corruption, leads us to describe two levels of reality we mentioned in the introduction: One, at the global level, where anticorruption policy is (at least in official proclamations) converging and homogenizing; and another, at the local level, where corrupt practices seem to continue unabated, and a multitude of countries have failed to implement anticorruption laws they nevertheless have accepted, written and promulgated, either through the course of imitation, "herding", or in response to coercive, conditional aid. Kamrava (1999, 114) captures this variegated but pervasive nature of culture as it relates to the state well, especially as it acts in response to globalization:

> National cultures are often divided and conflicted within themselves, and differences with the culture of the state add yet another level of contradiction and incongruence to an already contested conception of identity. … There is an increasing lack of congruence between the cultural dispositions of the ordinary people and those of the state apparatus and its stewards.

Policy Transfer and Culture: The Traditional Model

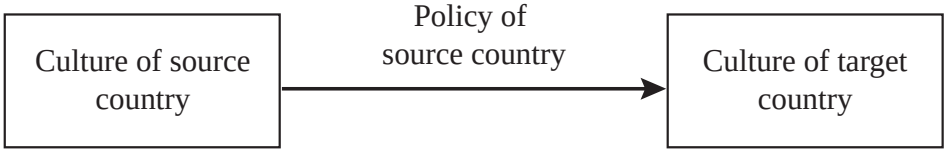
The foregoing argument is useful for building a dynamic policy transfer model based on a culture-adaptive, bottom-up policy logic. Policy transfer is the process by which ideas, knowledge and institutions developed in one time or place are used in the development of policies, programs and institutions in another time and place (Common, 1997; Dolowitz et al., 2000; Nikos, 2000), most often defining source

and target cultures as political entities. Policy transfer is a process primarily driven by political institutions (Dolowitz, 2004; Michael, 2004), particularly transnational organizations. We use this concept in distinction to policy *diffusion*, which is defined by Michael (2004) to occur primarily as practitioners share information on how to implement policy changes throughout professional and sometimes informal networks. Policy transfer is often largely disconnected from knowledge of the sociocultural contexts in which the policy of focus would be implemented, carrying an inherent risk of failure due to mismatch between the source and target sociocultural contexts (Boo, 2010; Huh, 2017). Dolowitz (2004, p. 27) notes that

> [I]t is likely that many instances of policy transfer are linked to processes associated with herding … and symbolic movement … there is evidence that if an international order appears to be developing around a common norm or procedure, nations not part of the order will begin 'transferring' these norms or procedures once a 'tipping point' (or critical mass of states) is reached. … Thus, if global forces indiscriminately encourage nations to become more alike, it is likely that the long-term impact of globalization will lead to unpleasant and unexpected political, social, and policy consequences.

Policy transfer as described above implies a cultural impact on policy consequences driven by top-down institutional transplantation, and such has demonstrably been the case with anticorruption law. In cross-national comparison, it is possible that there are conditions in which the origin and target cultures of a policy are sufficiently similar to the extent that the sociocultural contexts of policy being transferred support that policy, both in terms of its legal, structural anchors and in terms of its behavioral support in the actual, lived experience of citizens "on the ground," in "real life." Figure 1 summarizes the logic of the traditional model of policy transfer.

Figure 1. The Traditional Model of Policy Transfer



Sociocultural similarity between the country of policy origin and the target country is a widely prescribed requirement for policy transfer success (Dolowitz, 2004; Dolowitz et al., 2000; Häusermann, Mach, & Papdopoulos, 2004; Legrand, 2016). If the cultures of the two countries are not sufficiently similar such that the sociocultural contexts do not support the transferred policy, especially in terms of the functional and behavioral anchors of the policy, the probability of transfer success would be reduced (Stone, 2012). The resulting lack of support from the sociocultural context for the transferred policy might be observed as systematic noncompliance with promulgated laws, persistent corruption in the face of repeated attempts at policy initiation, harsher sanctions, and closer scrutiny. Momentum is lost just as soon as it seems to have been gained (Passas, 2010).

This traditional model of policy transfer has much room to be extended in two aspects. First, as discussed above, the national culture of a country can be better seen as a cluster of different values and other factors than as a single structure or phenomenon. This means that we cannot simply compare a source culture and a target culture as if they were unitary entities. Instead, we need a framework in which a culture is seen as a necessarily complex receptor for transferred policies to penetrate the target country (Stone, 2012). Second, the model ignores current practices in policy transfer at the global level: Policy transfer does not occur between just two countries but between *different* countries (Legrand, 2016). Some countries might agree to build the foundation for a global norm, but many other countries may decide to accept the norm—or to reject it. Therefore, it is necessary to develop a more sophisticated model of policy transfer that considers both cultural diversity and the dynamic nature of policy transfer at the global level. In the next section, to respond to the requirement of expanding the consideration of cultural diversity, we first develop a competing values perspective on culture. Then we develop a dynamic policy transfer model by considering the many-to-many transfer of a policy.

A DYNAMIC POLICY TRANSFER MODEL

A Competing Values Perspective

Culture is understood as being importantly related to corruption, political change, and the adoption of institutions (Almond, 1956; Jreisat, 1997; Kamrava, 1999). As Kamrava (1999, p. 115) argued:

> All states, even the most culturally aloof, must invariably contend with the forces produced by, influenced or motivated by culture. The relationship between the two is often complex and paradoxical, multi-layered and multi-faceted. States influence culture, and culture influences the state. . . . Insofar as political developments are concerned, their overall nature and characteristics cannot help but be influenced by culture in general and its specific manifestations in particular.

The notion that public policy should arise from, fit, and be applied to its own culture, history, and other sociocultural features is by no means new. Berkowitz, Pistor, and Richard (2003) cite Montesquieu's argument that the government and spirit of each nation's laws closely reflects its geography and climate as well as religion, history and culture, spotlighting what he wrote in 1748 that "the political and civil laws should be tailor made for each nation and that it would therefore be a great coincidence, should they fit another people equally well." Berkowitz et al.'s "transplant effect", together with Montesquieu's prescient observation, Dolowitz's (2004) "policy transfer" concept, and our distinction between "top-down" and "bottom-up" policy design and implementation (Lambsdorff, 2009) reaffirm the importance of culture in policy design and application.

To avoid the shortcomings of cultural determinism or of oversimplification of national culture, it is important to note that culture as a whole may not exert unidirectional, causal influence on the state and its institutions in such a way that is indicated in Figure 1. In fact, *multiple culture*s operating in a given society can be seen as a set of consistent, as well as often "competing", complexes of values, beliefs and attitudes, each producing different effects on the state, institutions, and policy implementation therein.[1]

We therefore proposed a definition of culture as a set of internally coherent clusters of values, beliefs, norms and attitudes, in which clusters can be loosely or tightly coupled as well as conflicting with other clusters. This definition implies that a conceptualization of culture in terms of policy transfer should meet two theoretical requirements. First, the definition of culture must reflect an anthropological understanding of culture that is all-embracing, coherent, and observable. Second, at the same time, the definition of culture must leave room to incorporate observations of different political groups (frequently described as "subcultures") often

1. A similar approach, the "competing values framework," has been suggested in organizational studies such as that by Cameron and Quinn (2011), although they typify organizational cultures and examine their effect on organizational performance and employee motivation, which is not our purpose here.

advocating different values, beliefs, and attitudes toward what is desirable—that is, the proposition that a national culture contains multiple sets of values. Accordingly, our conceptual focus is on the effect of cultural diversity rather than a specific type of culture.

An example is the problem of how whistleblowers are conceptualized within and across cultures. At the national level, Transparency International (TI) (2010, p. 6) has advocated "a shift in culture", noting that, in many countries, whistleblowers are perceived as "disloyal ... untrustworthy, and sometimes even as spies and traitors"; instead, TI argues, whistleblowers should be seen as "champions of the public interest." Interestingly, though, corruption often occurs in response to a sense of obligation to others in informal relationships or networks other than those of the official, institutional relationships found in the state (de Graaf & Gjalt, 2008). At the group level, whistleblowers have been found to be discouraged from "crying wolf" for fear of incurring retaliation from within their informal, embedded personal networks (Park & Blenkinsopp, 2009); however, they have also been regarded as heroes by different people, organizations, and media writers. For example, when there was no legal protection of whistleblowers from retaliation—regardless of public or private sector membership—an NGO called "People's Solidarity for Participatory Democracy" in South Korea provided political support and social safety nets for whistleblowers (http://www.peoplepower21.org/English). Value conflicts are even found at the individual level. For example, Hwang et al. (2008) found that, although public accountants in Taiwan acknowledged that corruption is a serious challenge to the integrity of society and the need and importance of whistleblowing to fight against corruption, they also expressed concern about loss of face and damage to their reputation because of whistleblowing from within their personal *guanxi* networks. In summary, culture is not a unidimensional force exerting influence on the state and its policy. Culture must be seen and studied from different angles and at different levels, including the transnational, national, organizational, and even individual levels.

This competing values perspective implies that certain subsets of values within a cultural community can be reconciled with specific policies—while other values might remain incompatible with those same policies, thereby impeding thorough implementation for reasons both persistent and sometimes difficult to identify. This dynamic could take policy implementation in unanticipated directions. It may be difficult to change a whole complex of beliefs and values in the short term (Hofstede, 2012). But if a cultural community has already been embracing different competing values, some dormant and some salient, and some of which compatible with the norms implicit in new policies, public managers may be able to find a way to

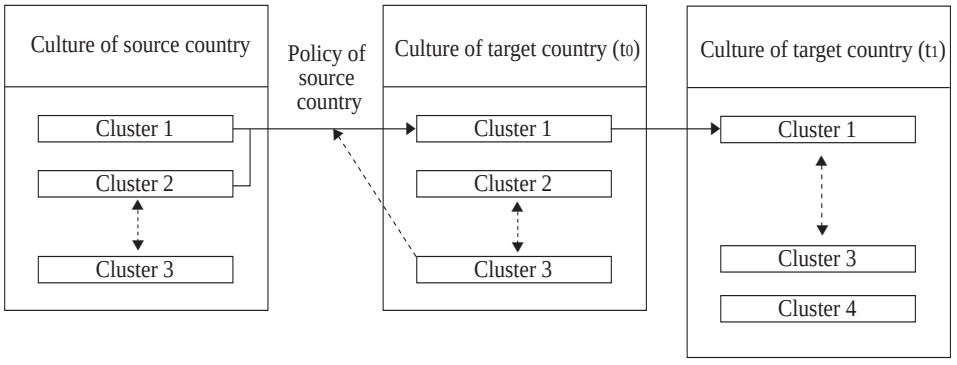
acknowledge those values and reframe the issue. Cultural communities provide different venues for the perception of, and action in response to, corruption, and it is critical to understand the details of cultural values being framed—and reframed—and societal sectors that facilitate reframing of the issue. This work requires diversity in a society, which turns our attention from a "top-down" approach to a "bottom-up" approach.

Expansion 1: Cultural Diversity

Figure 2 depicts the conceptualization of culture in a new way in accordance with the discussion above, with numerous cultural clusters coexisting within a national culture. Policy transfer viability is a derivative of similarities between national cultures. Four logical propositions therefore emanate from this model. First, Figure 2 indicates that *Cluster 1* in each culture are compatible with each other as well playing the role of a "cultural connection" between two countries. Second, *Cluster 3* in the target culture negates successful policy transfer.[2] Third, competition between cultural clusters within a culture such as *Cluster 2* and *Cluster 3* as indicated in Figure 2 may limit the likelihood of policy transfer success. Fourth, a target culture may change, in some vital aspect, over time. Cultural change can be described as change in cultural clusters: First, clusters can be expanded, newly formed or dissolved, and associations between them might also change; second, the degree and span of internal change can vary across clusters, fundamentally influencing the success or failure of policy transfer. For example, in Figure 2 *Cluster 1* is depicted as gaining more salience at t_1 than at t_0, indicating that the transferred policy may find a stronger cultural foothold.

2. It is worth mentioning that policy transfer cannot always be evaluated clearly as success or failure. Policy transfer can be holistic or partial, visible or invisible, and can be interpreted and implemented differently by multiple stakeholders (Park, 2012; Stone, 2017). It would suffice to mention here that we don't assume that policy transfer can be simply either successful or unsuccessful.

Figure 2. Expansion 1: A Revised Model of Policy Transfer: Application of the Competing Values Perspective



Note: The solid line indicates a positive relationship between the elements. The dotted line indicates a negative relationship between the elements.

In summary, policy transfer can be understood in a more dynamic way by considering the cultural elements of the source and target countries that support or oppose that policy in both cultural ecologies. When we understand culture as a set of clustered values that are compatible or conflict with each other and changing over time, which can be observed when we pay attention to what people value and how they behave, these many variables can be taken together to model policy transfer in a more realistic way. These validity improvements can dramatically change how policy transfer is observed and studied.

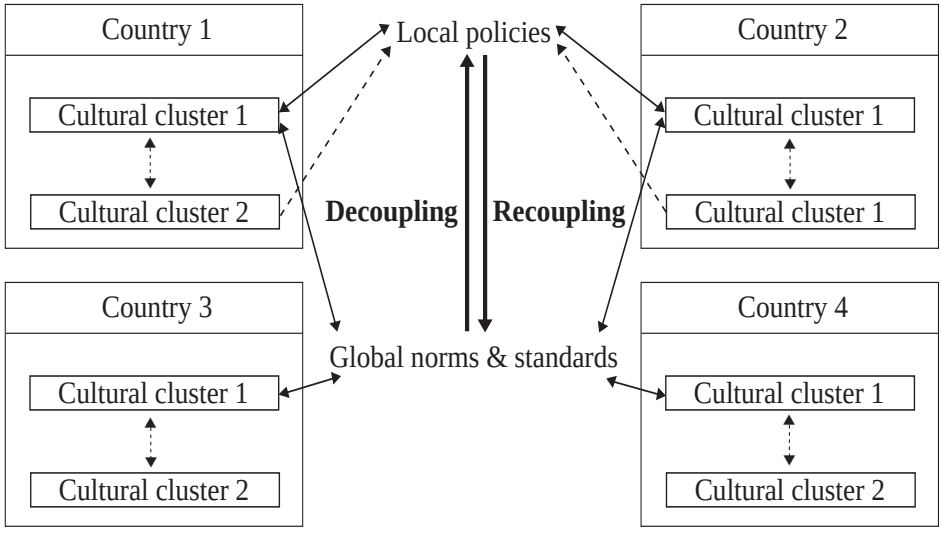
Expansion 2: Dynamic Policy Transfer

A more "dynamic" model can be developed on the foundation of a policy transfer model that considers the competing values perspective described above. This model still considers the variability of culture as pivotal, but also considers the dynamics between the spread of global norms and domestic adaptation. Alleviating the restriction of policy transfer between two countries, this dynamic policy transfer model considers the interaction between global norms and local adaptation. We conceptualize their relationship by the decoupling and recoupling process of policy transfer. *Decoupling* means that domestic actors, either at the national or provincial level, enjoy autonomy in understanding how their own anticorruption initiatives might best vary from the global standard while being empowered by the global goal of reducing corruption. *Recoupling* means that lessons from local implementa-

tions are collected and shared among policy implementers at appropriate levels. This recoupling process may facilitate the formation of a more effective policy framework and stronger norm at the global level (Marsh & Sharman, 2009), since it is better informed by specific instances of successful anticorruption policy in specific local settings. Recoupling therefore represents an important systems-theoretic role of providing feedback.

We depict the dynamic policy transfer model in Figure 3, where *global norms and standards* are extracted from the common cultural clusters across countries and local policies reflect them through decoupling and recoupling. Note that Figure 3 is different from Figure 2 in that the culture and policy of the source country is replaced by the more modern idea of a global norm. This replacement reflects the trend of global anticorruption policy formation which is a collaborative process involving leading countries such as the G20 (OECD, 2010) and specifically among EU countries (Meyer-Sahling, 2011). Furthermore, the global norm is defined not by a country-based set of value clusters but rather by a set of commonly accepted values in those nations.

Figure 3. Expansion 2: Dynamic Policy Transfer Model



Note: The solid line indicates a positive relationship between the elements. The dotted line indicates a negative relationship between the elements. The bold solid line indicates the decoupling and recoupling loop.

The logic of decoupling and recoupling indicated by the bold arrows in Figure 3 is the heart of the model of policy transfer. When we consider the *decoupling* of policy, we can say that a policy adapted by each country need not be identical to, or a subset of, that which is globally prescribed. Figure 3 implies that the adoption of global norms and standards, such as whistleblower protection, should be modified to fit local norms and values (Stone, 2012). *Recoupling* enables the iterative evolution of global norms and standards in response to what occurs at the local level. The policy diffusion process is therefore depicted in Figure 3 as a cyclical relationship. As such, the probability of policy transfer success can be defined as a function of the evolution of global norms and standards and the sum of the characteristics of domestic policies. For instance, Table 1 briefly demonstrates the development of whistleblower protection in South Korea and the United States according to the emerging global norm during the early 2000s. Although both countries moved to expand the coverage of protection and strengthen sanctions in line with global norms, the details of their policies are quite different. This divergence of policy illustrates the iterative decoupling and recoupling process through which local policies do not necessarily mirror one another, but remain diverse even as they accomplish very similar goals.

Table 1. Whistleblower Protection: A Comparison between South Korea and the United States

	South Korea	United States
History of Major Legislation	Anti-Corruption Act (2001) Act on Anti-Corruption and the Establishment and Operation of the Anti-Corruption and Civil Rights Commission Act (2008) Act on the Protection of Public Interest Whistleblowers (2011) other sectoral acts	False Claims Act (1986) Military Whistleblower Protection Act (1988) Whistleblower Protection Act (1989) intelligence community Whistleblower Protection Act (1999) No FEAR Act (2002) Sarbanes-Oxley Corporate Reform Act (2002) American Recovery and Reinvestment Act (2009) Dodd-Frank Wall Street Reform and Consumer Protection Act (2010) Whistleblower Protection Enhancement Act (2012) other sectoral Acts
Scope	public sector (—comprehensive) private sector (—excluding important laws)	sectoral
Protection	comprehensive: identity, legal/ physical protection, liability exemption, personnel, burden of proof shifting	court was conservative (e.g., Garcetti v. Ceballos [2006]) with respect to the public sector does not cover all public employees identity, legal protection, burden of proof shifting

Note: The categories of features of whistleblower protection identified here were informed by OECD 2010, p. 5.

In conclusion, the dynamic policy transfer model implies that policy transfer is not merely a process involving two countries. Instead, modern policy transfer is better understood from the perspective of global-local interactions at multiple layers. Nevertheless, Figure 3 illustrates the proposition that successful policy transfer depends on fit with the local culture(s) of the target country. However, the model incorporates three major theoretical expansions. First, the distinction between the source and target cultures is blurred to reflect the emergence of global norms across developed and developing countries. Second, the model emphasizes that policy transfer is not a one-shot practice but an ongoing, possibly iterative process that involves interaction among local cultures, country-based policies and global norms, over time. Finally, we consider local policies to be fundamentally important to the dynamic policy transfer process.

An Example of Dynamic Anticorruption Policy Transfer

One case from South Korean anticorruption policy illustrates how culture plays a key role in dynamic policy transfer. In 2006, there was an effort at the national level to establish a law that would punish both teachers who receive monetary gifts and parents who offer them. Expert groups such as legal service organizations, NGOs, and the executive branch reacted positively to the legislation, but the teachers' unions strongly opposed it, arguing that the law would erode the honor of the majority of teachers who were innocent of bribe-taking (Glionna & Park, 2009; The National Assembly, 2006). The teachers' unions rejected external control in this way, framing the legislation as threatening their legitimacy, arguing for internal control based on their professional standards of ethics. Eventually the bill failed to be enacted.

However, as the competing values perspective proposes, there were two cultural factors that encouraged the adoption of the policy core in different ways. First, local education offices, including the largest metropolitan branches in the country, voluntarily attempted to establish a whistleblower reward system (Lee, 2011). Although the scope of the regulation was limited to local schools, this case shows that even politically and culturally sensitive anticorruption policies can find both supporters and opponents operating from different value sets at different levels. Viewing a national culture as homogenous or monolithic would simply ignore such complexity. Instead, the case implies that a localized policy can find a cultural niche at the local level as a national culture is composed of different cultural clusters (or simply "subcultures").

Furthermore, we can identify cultural changes over time that eventually expand a more favorable environment for policy transfer. In the case, those practices have eventually been reflected in the most recent anticorruption law in 2016 at the

national level, in which stricter regulation of, and punishment for, improper solicitation and graft in throughout the entirety of the Korean public sector—including teachers—was prescribed (Choe, 2016). Remarkably, in a survey after the implementation of the law, more than 90% of public servants responded positively to the enactment and implementation of the law (Park, 2017). As discussed above, this remarkable change spanning a mere ten years indicates that a cultural foundations supporting a CAPI can be expanded as time goes on.

As observed in this case, the adoption of global norms at the national level was not viable at times, although anticorruption policy implementation was possible at the local level in which local cultural values compatible with the global norm found a more stable policy niche where values, political supporters, and policy experts resided. It was then that local institutional wisdom and operating knowledge rose organically as citizens and public leaders responded to awareness of global mandates (True & Mintrom, 2001).

TOWARD DYNAMIC POLITY TRANSFER: PRACTICAL IMPLICATIONS

In the previous sections we developed a model of dynamic policy transfer that reflects the current state of global policy transfer, particularly when culture plays the pivotal role in the success—or lack thereof—of proliferating and standardizing anticorruption policy transfer around the world. The bottom line of the dynamic policy transfer model is to not assume that policy makers understand *a priori* what leads to, or what eliminates corruption, but to adopt a posture that allows policy designers and implementers to speak for themselves—from within their own cultures and lived experience—about which forces work together within their sociocultural systems to reduce corrupt situations and compromised behaviors.

In this section, we discuss the practical implications of the model we suggest with respect to what should be seen as a desirable approach to policy transfer: "culture-adaptive policy initiatives (CAPIs)" that would increase the likelihood of the success of an anticorruption policy transfer effort. We focus on the process by which policy at the global level is transferred to the national level—but translated in terms of local cultural meaning that gives it vital connection to the values, beliefs and symbols that lay a foundation of long-term legitimacy and staying power, which was summarized as the dual process of decoupling and recoupling in the model. The process of developing CAPIs includes decoupling from the globalized level first, in order to experiment with implementation at the local level, and

then recoupling to the globalized network to share information on local implementation, but taking care meanwhile to make sure that contextual information is not lost in the retranslation to the global policy network.

Local Adaptation: Decoupling

Although policy transfer today is often transnational-institution-driven, operates by a top-down logic, and applies globalized norms or policy terms to national, sectoral, and organizational cultures, the dynamic policy transfer model has at its core CAPIs which are conceived of and advocated by citizens, officials, institutions, policymakers and policy implementers within national boundaries (Benson & Jordan, 2011; Evans 2009). Then, lessons are shared with knowledge clients at the global level (Michael, 2004; True & Mintrom, 2001). The ultimate result, aside from the more immediate policy target of problem-solving, is an increase of governing intelligence at the macro level, across institutions, political entities, professional associations, and public/private/nonprofit sectors. CAPIs—rather than being based on abstract legal frameworks which often have little connection to lived experiences in most local communities—derive their assumptions and goals from the experienced world. For this to happen, policy generation requires a buffering stage, during which policy is "decoupled" from the global level of policy or legal imperative for experimentation.

Sharing Culturally Modified Policy Knowledge: Recoupling

To spread knowledge obtained by policy implementation at the national level, avenues should be identified through which CAPIs can be shared by policy implementers, that is, public managers who are (1) likely to be responsible for public policy implementation and (2) networked with each other at some informal but professional level (Legrand, 2016), so that practical, "tacit" knowledge of how anticorruption policy implementation works in their sociocultural context can proliferate. As these policy implementations evolve from local cultural features, they yield better outcomes. Policy implementers may then recouple to the global policy level—yet another buffering stage, in which local implementation knowledge is translated to the global code and added to the global policymaking apparatus in the form of policy intelligence. It is after recoupling to the global level that critical information can be carefully shepherded back into the global policy network so that policy designers at that level learn from others' experiences. Problem-solution connections can be reframed as problem sets or culture- or people group-specific knowl-

edge. In these ways, policy knowledge can proliferate and self-organize across a variety of professional, institutional, formal and informal networks, resulting in greatly strengthened policy and deeper implementation understanding.

Directions for Empirical Research

Although the purpose of this article is to propose the dynamic policy transfer model, it is worthwhile to discuss potential directions for empirical research. Both qualitative and quantitative approaches offer hope for research in the future.

First, case studies can be performed to trace flows of tacit and implicit knowledge that accounts for local culture in the global policy network. A longitudinal case analysis would be particularly helpful (Howlett & Cashore, 2009) since, as seen in the case of Korean anticorruption policy, it usually takes time for a transferred policy to become accepted within the target culture. Furthermore, a comparative analysis of the institutionalization of a policy over time may elicit empirical bases for causal or association inference. Table 1 illustrates the evolution of the whistleblower protection laws in South Korea and the United States, which differ in their institutionalizations of the transnational norm. Then, a more comprehensive case study may investigate the cultural factors that affected the institutionalization of the policy in both countries.

In addition, from a more practical perspective, case studies regarding bottom-up implementation of globally-generated anticorruption policy may provide useful knowledge about anticorruption policy development. True and Mintrom (2001) demonstrated how local policy knowledge about gender equality proliferated through the international community to form global norms of gender policy. Because CAPIs emphasize inductive "learning by doing by local actors," gathering cases with different combinations of cultural clusters, histories of policy implementation (or nonimplementation), and policy environments including—and especially—implicit social structures and political actors would be a most interesting endeavor.

Second, quantitative methods can be applied by utilizing existing longitudinal worldwide survey data such as the World Values Survey and the Global Integrity Report at both the individual and national levels. Such surveys are based on specific theoretical frameworks such as public service values, the four Almond political culture types, the Hofstede dimensions of cultural variability, and the Triandis dimensions of vertical and horizontal individualism and vertical and horizontal collectivism (Triandis & Gelfand, 1998). Existing instruments, both valid and reliable across a wide variety of cultures, should be applied to investigating relationships between policy innovations and local cultural elements. Moreover, using these tools helps researchers bring the level of analysis down to the individual level, which is difficult

to do in one-off case studies. The World Values Survey, Hofstede and Triandis dimensions describing culture represent literatures widely applied to the private sector, but they have not been largely explored in the public sector applications. Table 2 provides examples of measures that should be brought to bear in comparing cultural elements related to corruption in the World Values Survey. Given such data, a quantitative analysis may focus on measuring cultural diversity within countries, between countries, and between individual countries and transnational imperatives, and changes in these relationships over time. In addition, findings of this kind may be compared with data on policy transfer and its subsequent effects.

Table 2. Example World Values Survey Indices

Survey Label	Scale
Make effort to live up to what my friends expect	1: agree strongly, 2: agree, 3: disagree, 4: strongly disagree
How much freedom of choice and control	1: none at all, … , 10: a great deal
Schwartz: It is important to this person adventure and taking risks	1: very much like me, 2: like me, 3: somewhat like me, 4: a little like me, 5: not like me, 6: not at all like me
Important in a job: good job security	0: not mentioned, 1: mentioned
Schwartz: It is important to this person to always behave properly	1: very much like me, 2: like me, 3: somewhat like me, 4: a little like me, 5: not like me, 6: not at all like me
Schwartz: It is important to this person tradition	1: very much like me, 2: like me, 3: somewhat like me, 4: a little like me, 5: not like me, 6: not at all like me
Future changes: Greater respect for authority	1: good thing, 2: don't mind, 3: bad thing
Democracy: Criminals are severely punished	1: not an essential, … , 10: an essential characteristic of democracy
Following instructions at work	1: follow instructions, 2: must be convinced first, 3: depends
Having a strong leader	1: very good, 2: fairly good, 3: bad, 4: very bad
Political action1: signing a petition	1: have done, 2: might do, 3: would never do
Political action2: joining in boycotts	1: have done, 2: might do, 3: would never do
Political action3: attending lawful/peaceful demonstrations	1: have done, 2: might do, 3: would never do
Justifiable 1: claiming government benefits	1: never justifiable, … , 10 always justifiable
Justifiable 2: avoiding a fare on public transport	1: never justifiable, … , 10 always justifiable
Justifiable 3: cheating on taxes	1: never justifiable, … , 10 always justifiable
Justifiable 4: someone accepting a bribe	1: never justifiable, … , 10 always justifiable
Confidence: press, police, parliament, civil services, government, political parties, major companies, justice system	1: a great deal, 2: quite a lot, 3: not very much, 4: none at all (sum of all scores)
Trust: your neighborhood, people you know personally, people you meet for the first time, people of another religion, people of another nationality	1: trust completely, 2: trust a little, 3: neither trust or distrust, 4: not trust very much, 5: not trust at all (sum of all scores)

Source: World Values Survey, 2009.

CONCLUSION

In this article, we proposed a model of dynamic policy transfer that includes a competing values perspective of culture to better understand and improve the global anticorruption policy transfer enterprise. It has long been recognized that culturally-*unadaptive* policy transfer has failed the anticorruption movement, that the bottom-up approach in public administration has earned attention for its knowledge value and adaptability, and that the fight against corruption is not only a global cause but also a local project requiring both patience and cultural insight. Based on these facts, we first proposed a definition of culture that can reflect variability within and across countries, and developed a dynamic policy transfer model by expanding the traditional policy transfer model. Finally, we discussed practical implications of the dynamic policy transfer model for generating successful culture-adaptive policy initiatives around the globe, and suggested directions for future empirical research. This paper contributes to the literatures of policy transfer in general, and anticorruption policy in specific, by proposing a policy transfer model that considers more flexible and complex interrelationships between culture and policy, both at the global and local levels.

Although the model is intended to be applied in more general contexts, using it as a lens to account for specific features of the Korean anticorruption policy implementation process proved useful in several ways. First, the dynamic policy transfer model emphasizes the role of social movements at the local level. For example, the case of the Solicitation Act and the Whistleblower Protection Act show the active role of NGOs and local governments as policy advocates and entrepreneurs. This means that democratization and decentralization of South Korea over the last four decades facilitated successful policy transfer. Second, as scholars have argued (Stone, 2017), it is important to note that the success and failure of policy transfer is a social construct that changes over time. The case of the Solicitation Act shows how local implementation of a policy idea can be cultivated by and, in turn, give rise to supportive cultural clusters, and eventually be expanded to the national level. This experience cannot be observed without a sense of time, as the Windows of Opportunities Framework implies (Kingdon, 2011). Therefore, policy entrepreneurs may need to adopt a long-term and flexible approach toward policy transfer. Finally, the model implies that transnational policy isomorphism should not be imposed in a top-down fashion. Experience tells us that wholesale adoption of global norms in anticorruption policy and others has not met policymakers' expectations (de Sousa, 2010; Huh, 2017; Park, 2012). The traditional concept of policy transfer includes both voluntary and compulsory policy adoption (Benson & Jor-

dan, 2011), while CAPIs involve policy translation (Stone, 2017) and more active lesson drawing (Rose, 1991), both of which are crucial for successful policy transfer.

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