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# The Study of Public Management in Europe and the United States

## A Comparative Analysis of National Distinctiveness

### Abstract

This article presents an overview of the scientific study of public management, gathering together some of the most authoritative experts in this area of study in Europe and the United States. The national distinctiveness of the study of public management in various countries will be presented in the context of specific state and administration. It will be shown that not only the practice of public management reform, but also the academic study of public management is influenced by the particular institutional context of state, politics and administration.

*Key words:* public management, scientific study, national distinctiveness

### 1. Introduction

This article is a summary of a recently published book, edited by myself (Kickert, 2008), which presents an overview of the state of the art of the scientific study of public management in various European states and the United States, written by eminent, nationally renowned scholars from the various countries. Examples are presented of distinctive approaches to the study of public management in a variety of Western European countries ranging from Norway up North in Scandinavia, the United Kingdom in the West, Germany, France, Switzerland and the Netherlands in the middle, Italy and Spain in the South, to Hungary in the East of Western Europe. The book concludes with an American viewpoint on public management.

Since the world-wide trend of public management reforms in Western administrations, many textbooks and handbooks on managing public organisations have been published. Although many of these books have an excellent quality there is one thing which I cannot help to remark: most of them are Anglo-American oriented. Of course publishing houses have to focus their attention on the big North American and English-language sales market. Books written in German, French, Italian, Spanish, let alone in 'small' languages like Dutch, Swedish, Norwegian or Danish, only have a relatively small national market, and are hardly known across the border.

In *Kickert* (2008) authoritative experts in the study of public management in their respective countries, usually the author of a standard public management textbook in his or

her country, present the specific characteristics of the academic study of public management in their homeland, and place that in the context of their specific national state and administration. It shows the national distinctiveness in the study of public management in a number of European countries. For the basic question in the book is how the scientific study of public management in various countries is influenced by the developments in the various national states and administrations.

## 1.1 Distinct national approaches

States and administrations in continental Europe strongly differ from the Anglo-Saxon ones and the United States, and they also considerably differ amongst themselves. That is reflected in the variety and specificity of the public management reforms that took place in different European countries (*Kickert 1997*). The belief in the early 1990s that the world-wide trend of public management reforms in Western administrations would tend to converge to one single, common, universal 'new public management' pattern (*OECD 1995*), has been refuted since in many comparative studies of public management reforms. The political-administrative context of a particular country does affect the form and content of the 'public management' reforms in that country. The comparative analysis of public management reforms by *Pollitt and Bouckaert (2004)* provided impressive evidence.

This comparative line of thought is pursued here one step further. The historical-institutional context of a particular state and administration does not only affect the practice of public management reforms, but also the scientific study of public management in that country. Unlike the natural sciences, where the nationality of a researcher is irrelevant for his or her study, in the sciences of administration the nationality does matter. The study of administration can never be detached from the particular national administration within a country. And the administrative variety within Europe and between Europe and the United States is immense. That is why the study of public administration in different Western European countries differ by country (*Kickert and Stillman 1999*). A survey of Public Administration education programs in continental European countries (*Hajnal 2003*) showed three distinct clusters: continental European countries with a strong political science component, Nordic countries with a stronger emphasis on business administration, and Southern countries with a predominance of law in their curricula.

In *Kickert (2008)* it was shown that the academic study of public management is also influenced by the particular institutional context of state, politics and administration in the respective country.

One would assume that the often asserted convergence of administrative reforms in Western countries, by implication has led to a likewise convergent common scientific approach to public management. Managerial reforms were mainly caused by the underlying budgetary stress. Hence the need for more effectiveness and efficiency, more productivity, more value for money. Hence the emphasis on result orientation, performance indicators, and steering on outputs and results. The developments since the early 1980s of a management science specific to the public sector, has therefore also led to commonalities. Most main-stream Anglo-American textbooks on public management pay ample attention to output budgeting, steering on results, client orientation, competition and market testing, and to the usual facets of management: strategic, organisational, financial, personnel,

and information management (see for example the well-known textbooks by renowned North-Americans scholars like *Bozeman* (1989), *Denhardt* (1993), *Lynn* (1996), *Rainey* (1997) and *Straussman* (*Bozeman and Straussman*, 1990), or by likewise well-known British scholars like *Ferlie* (et al 1996), *Flynn* (1990) and *Pollitt* (1990), or by the Australian *Hughes* (1994)). Although French, German, Italian, Dutch, Swiss and Scandinavian textbooks on 'public management and organisation' do indeed show a remarkable similarity with the main-stream Anglo-American textbooks in similarly paying ample attention to financial management, budgeting, client orientation, marketing and the more, a closer look reveals important underlying differences that are related to their distinct political-administrative circumstances.

Elsewhere (*Kickert*, 2005) three clear examples of distinctive approaches to the study of public management were presented, that is, in France, Germany and Italy, three countries with a distinctive, typical continental European, strong legalistic state traditions. That inquiry was further pursued by broadening up the international perspective to include more European countries, and above all by inviting authoritative scholars of public management in the respective countries to present their national case. Nationally renowned and authoritative experts in the study of public management were asked to each write a chapter on their country. As the objective of the book was to relate specificities in the national approach to the study of public management to the national specificities of state, politics and administration, all authors were asked to use in describing his or her respective country, is:

- a brief historical account of the state and its administration;
- a survey of recent developments and reforms in state and administration;
- a state of the art of the study of politics and administration both in education and research;
- an overview of the specificities of the study of public management in the national context.

## 1.2 Selection of countries

The countries were selected to include examples of different types of state traditions. In comparative politics and administration usually three main European state types are distinguished. First the Napoleonic type of states, with post-revolutionary France as the prime example. Second the Germanic type with its Prussian and Habsburg roots, in which Germany and Austria can be placed. Third the Anglo-Saxon type with Great Britain as the main example. So the three large exemplary countries France, Germany and Britain have been included in the book.

The smaller Northern European states such as the Netherlands and the Scandinavian countries are often considered a mixed form of the Anglo-Saxon and Germanic types of state. Elsewhere (*Kickert and Hakvoort* 2000) we have argued that this does not take into account that a whole range of smaller states from the far North to the middle of continental Europe – Finland, Norway, Sweden, Denmark, the Netherlands, Belgium, Switzerland, Austria – all have three characteristics in common: they all have a consensus type of democracy, they all have a neo-corporatist type of state, and they have socio-political cleavages and fragmented political and social subcultures. So three examples of

these small continental European states – Norway, the Netherlands and Switzerland – have been included in the book.

Although the Southern European states Italy, Spain and Portugal can be considered as examples of the Napoleonic type of state, they have a number of economical, social and political characteristics in common that makes them distinctive. A distinctive Southern model of politics and administration might be discerned (*Magone* 2003). Southern European countries are often underrepresented in comparative studies of government and administration. Even after the end of the dictatorships (the military revolution in Portugal in April 1974, the fall of the colonels in Greece in July 1974, and the death of Franco in Spain in November 1975) and the transitions to democracy, the interest of the international political and administrative science community in the states, politics and administration of Southern countries like Greece, Spain and Portugal remains restricted, even in the field of comparative politics and government, let alone in the scientific community interested in public management. So two major Southern European states – Italy and Spain – were included.

Another type of state that is becoming increasingly important in Western Europe, are the ‘new’ European democracies, the former communist countries of middle Europe, the new member states of the European Union. The transition to free market economy and parliamentary democracy represented much more fundamental and urgent reforms of these states and administrations than the budget-driven efficiency reforms of public management. The modernisation and Europeanization of these states (*Goetz* 2001) requires them to first restore the legalistic principles of the *Rechtsstaat* before embarking on the path of public management. So the example of the Central European state of Hungary has been included in the book.

Finally a leading North-American public management scholar, who is also well-acknowledged with public management in Britain, France and Germany (*Lynn* 2006), was invited to present his view on the study of public management in the ‘new world’ and to give a critical reflection from the other side of the Atlantic Ocean on the various European approaches.

## 2. Different state models in Europe

### 2.1 Napoleonic and Germanic ‘Rechtsstaat’ model

Many continental European countries have a strong legalistic state tradition, France and Germany being the prime examples. The Napoleonic state model, in which the nation state is united and the state serves the general interest, the administration is centralised, hierarchical, uniform, accountable and controlled, and state officials are highly trained and qualified, and organised in professional ‘corps’ (*Wright* 1995; *Wunder* 1995), also marked the state formation of Mediterranean states like Italy, Spain and Portugal. The Germanic *Rechtsstaat* tradition can be recognised in countries like Austria. The main difference between the legalistic Napoleonic and the Germanic *Rechtsstaat* model is that the Prussian state formation was not based on a revolutionary abolishment of monarchy by the bourgeoisie, but on the hegemony of the Prussian elite, in particular the ‘iron chancellor’ Bismarck. The 19<sup>th</sup> century German idea of *Rechtsstaat* meant that the sovereign was to be bound by laws and rules (*Benz* 2001), which were to be equally and fairly ap-

plied to all state subjects, and that judges and administrators were to be neutral. Contrary to the French *principe de légalité* in which the law is the expression of the *volonté générale* of the people (Ziller 2003), in Prussia and Habsburg Austria the emperors remained in absolute power. Parliamentary democracy was only established in Germany after the First World War.

The establishment of the Liberal constitutional *Rechtsstaat* became a fundamental turning point in the development of many European states (Finer 1954; Heper 1987; Page 1992). It introduced the legalistic *Rechtsstaat* thinking about state and administration. Legislation became the fundament of the state. Administration should be based on the primacy of the law. Constitution, laws and regulations became the exclusive source of administrative actions. Therefore the law gained the monopoly of the only relevant expertise for the effective functioning of the state. This led to the *Juristenmonopol* (monopoly of lawyers) in continental European administrations. State officials were predominantly (public) lawyers. The establishment of the *Rechtsstaat* also marked the beginning of modern professional bureaucracy. State officials transformed from personal servants of the King into servants of the impersonal state. They became properly educated and trained professionals with the proper expertise, they fulfilled an official, formally described task, held a formal and protected life-long position, with regular salary and pension. The ideal-type 'bureaucracy' (Weber 1922) was born.

The dominance of legalistic thinking in North-Western European administrations like the Scandinavian ones and the Netherlands, more or less lasted until the Second World War and came to an end with the post-war expansion of the welfare states. In Germany, Austria, France, Italy and Spain, however, the dominance of administrative law has not vanished.

## 2.2 Southern European model

The four Southern European states – Italy, Spain, Portugal and Greece – have a number of important cultural, social, economic, and historical characteristics in common, and their political systems are also often seen as similar (Magone 2003). They have failed to sustain stable democratic political systems in the past, and have experienced authoritarian regimes. They used to be economically less developed than most other Western European countries. In (the Southern parts of) Italy, Spain and Portugal agriculture was dominated by large farms. And unlike many other European countries where the Catholic-Protestant split was a major religious cleavage, in the South the politically important religious cleavage was a clerical-anticlerical one. Politics used to be dominated by the conflict between progressive Liberal and conservative patrimonial parties. The intense conflict between left and right political forces later formed a fertile ground for strong communist influences, such as in post-war Italy and in post-1974 Portugal. A distinctive Southern European model of democracy might be discerned (Pridham 1982), even a distinctive Southern model of bureaucracy (Sotiropoulos 2004).

Formalism and legalism strongly prevail in the Portuguese, Spanish, Italian and Greek administrations. The vast majority of civil servants in Southern Europe are administrative lawyers. Legalism and formalism were historically introduced as counter-balance against political interference, and in highly politicised Southern administrations that is still the case. Formalism and legalism are major reasons for the rigidity and inefficiency of Southern bureaucracies. Management reforms, which are based on an economical

frame of reference in terms of effectiveness and efficiency, are contradictory to the legal frame of reference in terms of legal accountability. As management reforms have to be formulated in juridical language in order to become legally enacted, the legalistic monopoly remained unbroken (Kickert 2006).

In contrast to North-Western Europe where trained and qualified professionals run a rational, professional, 'neutral' administration, in Greek, Italian, Spanish and Portuguese administrations the factor of overriding importance is politicisation (Sotiropoulos 2006). Political control of administration, relations between politicians and bureaucrats, political nominations of officials, party patronage and clientelism, fundamentally differ from the political practice that in the rest of Western Europe.

### 2.3 Consensus and corporatism in small continental European states

Many of the smaller states in continental Europe are highly similar in three respects.

First their type of state and politics. They all have a consensus type of democracy (Lijphart 1984). By contrast to the majoritarian Anglo-American two-party system of democracy, they have a multi-party system with proportional elections where governments consist of coalitions between more parties. The search for compromises and consensus is a main ingredient of their political culture. The search for consensus in the post-war *Große Koalition* in Austria, in the *Proporz* system of division of seats in government in Switzerland, in the coalition governments between the Flemish Christian-democrats and Walloon Socialists in Belgium, in the varying coalitions between the Social-democrats, Christian-democrats and conservative Liberals in The Netherlands, in the multi-party coalition cabinets in Denmark and Norway, which sometimes do not even have a parliamentary majority, these forms of consensus democracy explain for the political stability in these societies.

Secondly their type of state-society relations. They all have a neo-corporatist type of democracy. Contrary to the American pluralist type of democracy, in a neo-corporatist type of democracy interest representation takes place by a few, well-organised groups, which are recognised by the state and to which many public tasks and state authority have been delegated (Williamson 1989). Sweden has a Social-democrat type of corporatism, The Netherlands a typically confessional type, Belgium a linguistic, regional and confessional type, Austria again another type, but all are variations of the same basic type of neo-corporatism;

Thirdly their type of society. They all have socio-political cleavages and fragmented political and social subcultures. Austria has its Christian and Socialist *Lager*. Switzerland has its regional and linguistic fragmentation into *Kantons*. Belgium has the linguistic cleavage between Flanders and Walloon and the political cleavage between Socialists and Christians. The Netherlands had a *Verzuiling* (pillarisation) into Protestant, Catholic, Socialist and Liberal-neutral pillars.

The whole range of countries from the far North to the middle of continental Europe - Finland, Sweden, Norway, Denmark, The Netherlands, Belgium, Switzerland, Austria - all have these three characteristics in common, albeit in more or less degrees and in different variations. In Scandinavian states no political fragmentation like in Austria, Switzerland, Belgium or the Netherlands, exists.

The three Scandinavian states – Denmark, Sweden and Norway – are examples of the model of consensual and corporatist democracy where political parties, officials and interest groups co-operate to produce public policy. Compromise, co-operation and consensus are its characteristics. Traditionally the Social-democratic parties in the various Scandinavian countries were highly influential. A typical characteristic of the Nordic states is the intensive and formalised role that interest groups play in the preparation and formulation of public policies. The distinctive model of Scandinavian politics and government is related to the specific Nordic model of welfare, with Sweden as its typical example. The welfare sector is large, social rights of citizens are basic, most public services are provided by the state, and Social-democratic, egalitarian values dominate (*Arter* 1999; *Elder et al* 1982; *Heidar* 2004).

### 3. Study of public management in Europe and the US

In the subsequent chapters of the book (*Kickert*, 2008) the following public management scholars present the specificities of the various approaches to the study of public management in their respective countries.

#### 3.1 France. La spécificité du modèle français d'administration

*Bartoli* (2008) describes the relatively recent development of the study of public management in France in relation to the specificities of the French model of state and administration. For the long and rich history of the French state has led to many specificities that are crucial to understand the functioning of its administration and its study. The traditional distinction between the public sector and the private world is centuries old, and under Napoleon's reign the state and administration has been further enhanced. France knows a strong central state. The size and diversity of the French public realm is remarkably high. The state's civil service has a complex and legalistic nature. Managerial logics have only recently been introduced in France. Typically French is the special connotation of the term *service public*, defined as 'all activities of general interest carried out by the public administration'. Typically French is the existence of different civil services, the special status of civil servants, the existence of professional bodies of civil servants, the educational system with its *grandes écoles*, the recruitment by competitive examination, just to mention a few.

The study of public management is opposed to the traditional juridical approach of *gestion publique*. Public management science in France is mainly derived from law and economy, organisation sociology, political science and management science. *Bartoli* gives a highly informative overview of the very particular French system of administration, and the teaching and research in public administration and management.

#### 3.2 Germany. Poorly institutionalised and fragmented

*Reichard* (2008) gives an account of the development of public management in Germany. As mentioned before the German *Rechtsstaat* formation in the 19<sup>th</sup> century was not based on a Liberal revolution and formed by a Liberal bourgeoisie, but based on Prussian he-



gemony with the *Kaiser* remaining in absolute power. Typically German are Hegelian notions that the state is separated from and standing above society. In *Hegel's* view the state is the *Verkörperung der sittliche Idee* (the embodiment of the moral value). The state stands for harmony and unity. The individual citizen is *Untertan* (state subject, literally meaning submissive). The German state developed a different relation to democracy than in France. The state was a purely legal entity, where administrative law (*Verwaltungsrecht*) was absolutely dominant. This legalism, by the way, explains for the fact that the state and administration could continue to function in times of political breakdown, like in 1918 and 1945. It is only after the World War II that Germany separated from this tradition. Civil servants are, however, still predominantly lawyers. The *Juristenmonopol* still exists and administrative law still dominates.

*Reichard* relates the recent administrative reform patterns in Germany to the field of public management. Not surprisingly in the prototype example of the *Rechtsstaat* the administrative law approach still dominates the academic study of public administration. A political science based approach of administration started only after the Second World War and is still having difficulties in getting a proper institutional position in academia. The study of public management is mainly located in *Fachhochschulen* (polytechnics), in business administration and economics departments. *Reichard's* conclusion is that public management as an academic field is poorly institutionalized and rather fragmented in Germany.

### 3.3 Great Britain. Public service delivery and its management

*Osborne* and *McLaughlin* (2008) present a highly informative account of the development of the discipline of public administration and management, the more so because the tension between the political science and managerial roots of the discipline in Britain are now described by authors whose basis lies in management science. Their account refreshingly differs from the usual political science review of state, politics and administration and its study, and much more focuses on public service delivery and its management.

After a historical description of the development of the British state from night watch, via paternalistic, to welfare state, and the recent moves to contract and plural state, the consequences are sketched for the specific British way of public service provision. The authors proceed by drawing the various disciplinary roots of the study of public administration. Political science has been and still remains highly influential. Administrative law has had no significant influence in the 'common law' type of British state and administration. *Osborne* and *McLaughlin* pay ample attention to the ongoing debate in Britain between political and policy science on the one hand and management science on the other. In the strongly political science oriented British administrative science community the polytechnic and business administration based study of public management is not highly regarded. The authors make clear that such an antagonistic stance can hardly contribute to further progress. More relevant seems the relationship between public administration and management on the one hand, and the practice of public service delivery and pluralist policy-making on the other. Finally *Osborne* and *McLaughlin* consider whether public management is different in central government, local government, in the voluntary sector, or in public-private partnerships.

### 3.4 Norway. Combination of organisation theory and political science

*Christensen and Laegreid* (2008) illustrate the relationship between the study of public administration and management, and the development of the Norwegian state and administration over time. In Norway the study of public administration has a strong political science perspective. Administrative science actually is an integral part of political science. Typical characteristics of the Norwegian approach of public administration is the combination of organization theory and political science focusing on empirical studies of decision-making and on institutional changes in organizations. This political and organization science mixture is the internationally well-known Norwegian trade-mark, for which the basis has been laid by the long and close co-operation between *Johan Olsen* and *Jim March*. Another well-known Norwegian trade mark is the neo-institutional approach, for which *Johan Olsen* also laid the basis when he and *March* rediscovered the importance of institutions.

In Norway public management is taught in business schools. Public management reforms in Norway were hardly driven by budget deficits. Due to its immense gas and oil reserves the Norwegian state has no budgetary problem. In the Norwegian consensual and corporatist state public management was more a matter of pragmatism and efficiency.

### 3.5 The Netherland. Managing complex networks and public governance

The account of the study of public management in the Netherlands is presented by myself. Like elsewhere in Europe the study of public administration in The Netherlands dates from after World War II. It was the construction and expansion of the post-war welfare state that required scientific support for all new plans and policies, hence the beginning of policy sciences. The 1970s showed a steady expansion of the field of public administration, which at first had a domestic orientation. Only later did it become more internationally oriented, mainly directed at colleagues in the United States. The study of public administration and management more or less followed the North-American example. A remarkable characteristic of the Dutch study of administration is its close relation to administrative practice. Many public administration scholars are strongly involved in advisory work, contract research, counselling, are member of government committees etc.

Dutch local government underwent in the mid 1980s a major reform wave, that later became an almost prototypical example of 'new public management'. The so-called 'Tilburg model' of municipal reform was later followed in Germany and Switzerland. National administration in the 1990s underwent a variety of public management reform.

After long following the American example finally in the 1990s the Dutch field of public administration and management developed some distinct approaches, such as the approach of 'managing complex networks' and 'public governance'. Management in complex and dynamic inter-organisational networks, more or less resembling the British approach of networks and governance, became a Dutch specialty. These typical Dutch approaches of public management can be related to the historical characteristics of Dutch politics, government and governance. The underlying state tradition beneath governance in complex networks is centuries old. Steering by a strong central state has hardly ever existed in Dutch history. State governance in The Netherlands has always been a matter of persuasion, deliberation, pragmatism and compromise.

### 3.6 Switzerland. Wirkungsorientierten Verwaltungsführung

*Schedler* (2008) outlines the basic principles of independence and neutrality that the Swiss cherished for centuries and still do. The underlying Swiss state traditions of federalism, non-professional part-time politicians (*Milizprinzip*), direct democracy, and the regional, cultural and linguistic differences have an impact of both the functioning of the administration and its study.

The study of public administration and management in Switzerland arose mainly in response to need for practical skills. Its origins lie in three major disciplines, of which the first two form the core of *Verwaltungswissenschaften*. First public law which has a long tradition following the French Napoleonic approach. Secondly political science which has treated public managers more or less as micro-politicians, hence its strong attention for policy analysis. Thirdly management science, which in the beginning was a straightforward translation and application of generic management, that is, business administration. Only budgeting and accounting were specifically public sector oriented fields. The study of public management was mainly domestic and in German. The international focus was minimal.

The trend of 'new public management' reform in Swiss administration, in which *Schedler* has played an active role, has resulted in an increasing demand for research, teaching and executive education in public management.

### 3.7 Italy. Management and the dominance of law

*Meneguzzo* (2008) describes the fairly recent developments of public management research in Italy, which were the result of the administrative reforms that started in the early 1990s. The public uproar about the corruption scandals led to a landslide in the political system, that paved the way for state reform (decentralization), privatizations and public management reforms. As the Italian administration is still dominated by lawyers and obsessed with legalism, it is no wonder that the study of administration is still dominated by public law. Reforms in Italian administration have to be laid down in legislation. The frame of reference of public law is, however, fundamentally different from the frame of reference of public management. Public management reforms have not succeeded in breaking the monopoly of administrative law in Italian administration. Public management is only gradually gaining some terrain, both in practice and in academia. A distinctive Italian approach to public management is the so-called *Economia Aziendale* approach, a kind of institutional economic theory of organizations. Public management in the beginning mainly was the application of business administration to the public sector. No wonder that in Italy public management is mainly studied in (public sector departments of) business schools, of which the Bocconi university in Milan is the most prestigious.

### 3.8 Spain. An interdisciplinary and ill-defined terrain

*Ballart* (2008) after a brief historical review outlines the developments that took place after the death of Franco (1975) and the transition from dictatorship to democracy (constitution 1978). Although the Opus-Dei technocrats have carried out some administrative modernizations under the Franco regime, and to some extent laid a basis for the scientific

study of administration, that field only really started to develop after the establishment of democracy. The study of administration in Spain is traditionally dominated by public law. The establishment of a democratic *Rechtsstaat* after the long authoritarian regime also reinforced the dominance of administrative law. Only public finance and budgeting were recognised as serious alternatives. Only since the 1990s did the field undergo a qualitative change with the rise of policy analysis and management and organisation science. The study of public administration and management in Spain is nowadays claimed by law, political sciences, economics and sociology. It therefore is an interdisciplinary and ill-defined terrain. Officially political science and administrative science jointly form a university degree. Public management is also used to denote Business School programmes. Nevertheless *Ballart* manages to present an informative and systematic overview of the state of the art in Spanish public administration and management research. His conclusions are that the object of study still is predominantly domestic, that there are many specialists in various policy sectors, but few scholars in public management. The many textbooks are written in Spanish and are rather practical than theory-driven.

### 3.9 Hungary. Management and the transition to democratic *Rechtsstaat*

*Hajnal* and *Jenei* (2008) begin with a historical account of the development of the study of public management that already starts in the middle ages, a remarkable sense of historical awareness. After the communist era, Hungary underwent a radical transition to market economy and liberal democracy. From the 1990s on the utmost important task was to restore the democratic *Rechtsstaat* tradition. Joining the free Western world was also symbolised by the strong desire to attain membership of the European Union, which was attained in 2004. The fundamental reforms of economy, society and state were much more important and urgent than managerial efficiency reforms. Legalism and managerialism have a tense relationship. The legal frame of reference is about legality, legitimacy, legal security and equality, rules of proper administration etc. In a country with a long and despised tradition of communist dictatorship those legal values are of course cherished. Public management has an economic frame of reference in terms of effectiveness, efficiency, and economies, but was hardly as important as the painful transition of the formerly communist planned economy to a free market economy. The closing of the huge and inefficient state companies in Hungary led to massive unemployment and bitter poverty. Pressure for public management reforms in Hungarian administration had primarily an external source, that is, the monetary requirements of the European Union. *Hajnal* and *Jenei* conclude that in Hungary there does not yet exist a separate field of study of public management. The study of public administration is only in its beginning phase.

### 3.10 The United States. Management in the new world and a reflection on Europe

*Lynn* (2008) was given the last word in the book to present his view from the other side of the Atlantic. His historical account of the study of public management in the 'new world' certainly made clear that the stereotypical simple prejudice against Anglo-American 'managerialism', as a narrowly defined intra-organisational matter of effectively and effi-

ciently 'running the business of government' definitely does not coincide with his view on the American approach to public management. According to *Lynn* from its 18<sup>th</sup> century beginnings the American state had an executive management orientation. Yet emphasis was laid upon democratic control, checks and balances, and separation of powers. In the late 19<sup>th</sup> century the separation of administration from politics was meant to prevent corrupting and political partisanship. In a certain sense the formerly despised European tradition of administration was introduced, but then with a strong separation between legislature, executive and judiciary (*trias politica*). The early teaching of public administration and management was associated with reform movements, such as the call for professional city managers and the introduction of management in federal government. After the 'New Deal' it became really widespread. In the late 20<sup>th</sup> century an intellectual crisis in the field of study led to the rediscovery of constitutional foundations, the acceptance of governance, and to new public management.

*Lynn's* final concluding remarks from the American viewpoint on public management about the European developments in public administration and management, are equally reflective and critical. He contrasts 'old' public administration with 'new' public management and concludes that public management and managerialism in Europe have come to mean something different than in the United States. In Europe public management, the delivery of public services in a businesslike way, is distinguished from public administration, whereas Americans do not see both as different from each other. According to *Lynn* Europeans tend to emphasize public *management*, Americans tend to emphasize *public* management.

#### 4. Conclusions and discussion

There is an international common universe of discourse on public management. The convergence of a common scientific approach of public management is evident. Managerial reforms were almost always caused by budgetary pressures. Public management is about effectiveness and efficiency, productivity, value for money and client-orientation. Public management is about result orientation, performance indicators, and steering on outputs and results. Textbooks on public management pay attention to output budgeting, steering on results, client orientation, competition and market testing, and cover the usual facets of management: strategic, organisational, financial, personnel, and information management. And most public management textbooks are Anglo-American.

The purpose of this review was to show that the study of public management in Europe does not always correspond with the main-stream Anglo-American approach, that there are specific different approaches in Europe. It is no coincidence that the differences are most clear in countries with a prevailing legalistic state tradition. For a fundamental difference between continental Europe and the Anglo-Saxon world is the legalistic difference between public and common law. In many continental European countries a *Rechtsstaat* tradition prevails with a dominance of administrative law. State officials are lawyers. The only relevant study of administration is considered to be the juridical one. Such a strong legalistic state tradition does not exist in Great Britain or the United States, but is still strongly dominant in countries like Germany, France, Italy and Spain. Remark though that these countries also differ amongst themselves.

France does have a strong legalistic state tradition and the *état administrative* is dominated by highly trained civil servants. The very top-officials in French administra-

tion are not only administrative lawyers, but were also educated at the *institutes d'étude politique* and subsequently graduated at a *grande école* like the *École Nationale d'Administration*. Public management does play a central role in French state reform. German (national) administration is still almost exclusively dominated by administrative lawyers. Public management reform has not taken place at the national level, but only at the level of municipal and regional (*Länder*) government. Likewise are Italy and Spain strongly dominated by administrative law. Public management reforms are very hard to introduce and sustain in these legalistic countries.

In North-Western Europe the dominance of the legalistic paradigm came to an end with the post-war construction and expansion of the welfare state. It was recognised that the planning and realisation of all kinds of welfare arrangements could not be based on the single expertise of administrative lawyers only. This marked the post-war rise of social sciences, and particularly the policy sciences which were used as a scientific rationalisation of the strong steering and planning by government. In countries like Norway and The Netherlands the study of administration and management more or less followed the American example. Yet they possess a distinct state tradition of consensual and corporatist democracy. Which in due course inevitably influenced their approach of public administration and management.

One might tend to think that the ongoing further modernisation of European states and administrations will further move them away from traditional legalism towards modern managerialism. Academic education of future public officials should provide students with a modern view on the functioning of state and administration. And nowadays that is widely considered to be public management. In various Western European countries there are, however, indications that the neo-liberal, businesslike, managerial reform trend of the 1980s and 1990s is on its retreat. In Britain, Scandinavia and the Netherlands governments are reconsidering the necessity of recent privatisation, are reducing the autonomy that was recently granted to public bodies and agencies, are questioning the democratic accountability of excessive managerial autonomy, are protesting against excessive salaries of some new public managers, and want the state to regain more control. Maybe the heydays of public management are over.

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