

NPM Reforms in Anglo-Saxon and Continental European Cultures

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Preface

If I had written this preface in the years when my doctoral dissertation was accepted, I would, in all likelihood, have begun with clichés such as “With globalization... With the Oil Crisis...” or “Since Ancient Greece... After the French Revolution... With the invention of the steam engine....” But those clichés are now dead. Long live our new cliché: “With AI....”

Yes, “With AI...” would have been the best clichéd opening for my preface. But that is not because my doctoral dissertation is about AI. Not at all. My dissertation deals with the period before AI, with the final moments of the “classical” era. Yet even though AI technologies did not shape the content or the writing of my dissertation, they did shape the formation of this book project. That is because AI has transformed not only mechanical processes but also human behavior, perceptions, and expectations. To put it more plainly in relation to our subject, people are now interested in texts that address a topic directly. They no longer want to encounter, within the main text, ancillary discussions that are only there to make that topic more intelligible. AI can now supply that context for you in a matter of seconds. Put differently, if the reader lacks background knowledge about a secondary issue mentioned in the text, that knowledge can now be reached easily, together with its context.

When I was writing my doctoral dissertation, AI technologies were not yet widespread enough to shape everyday social life. As a natural consequence, the dissertation took the form not of a lean text but of a comprehensive and lengthy work containing many different issues. Today, however, AI technologies have spread across society, and preparing a text that reflects that reality has become a necessity for my book project as well. In truth, even before AI became widespread, the dissertation itself was already quite extensive and long. One reason for that was the tendency to discuss every issue in full detail under the pretext of “introducing the foreign literature.” Yet those issues should

have been limited by the scope of the dissertation. In that sense, this is also a written expression of my own self-criticism regarding my dissertation.

As a result of all these considerations, three separate books have been produced from my doctoral dissertation: “On Bureaucracy, Culture, and Reform”, “NPM Reforms in Anglo-Saxon and Continental European Cultures”, and “Administrative Culture and Public Administration Reforms in Türkiye”. In this way, the original dissertation has been reorganized into works that are more focused, more accessible, and better suited to contemporary reading practices. Each of these works possesses its own internal coherence of meaning, yet when they are read as a book series they also form a broader meta-coherence. I hope these books will prove useful, both individually and together, to academics interested in public administration, to policymakers, and to anyone with an interest in this field.

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Introduction

Public administration reforms are often treated as a matter of technical restructuring, fiscal necessity, or the set of administrative tools preferred by political authorities. Yet what we call reform is not simply an administrative intervention that changes the structure of institutions, the distribution of duties, or the modes of service delivery. Reform is also directly tied to deeper questions such as what the state is, how the public interest ought to be defined, the limits within which bureaucracy should remain, and the kind of ground on which the relationship between citizen and administration should rest. For that reason, any serious effort to understand public administration reforms must turn not only to legal arrangements, organizational transformations, or economic justifications, but also to the administrative culture, political tradition, and patterns of social mentality that lie behind them.

At precisely this point, the New Public Management approach appears not merely as a reform package, but as the product of a deep debate over the position of the state and the nature of public administration. Beginning especially in the 1970s, increasingly visible economic crises, the fiscal pressures generated by welfare-state practices, criticisms directed at the sluggishness of bureaucratic structures, and growing demands for efficiency, productivity, performance, and accountability in public services led to a renewed questioning of the traditional Weberian understanding of administration. In place of rigid hierarchy, proceduralism, and centralized organization in public administration, a new understanding emerged in which flexibility, results orientation, performance measurement, decentralization, a contract culture, competition, and market-like mechanisms came to the fore. Yet it is impossible to say that this understanding found the same response in every country, was implemented through the same instruments, and produced the same outcomes.

That, in essence, is where this study begins. New Public Management is often presented as a reform logic belonging to the Anglo-Saxon world, and at

times it is described as a model transferred from outside into societies whose administrative traditions are culturally and historically different. But such an approach does not adequately explain the complex relationship between reform and culture. Public administration reforms do not take shape in an abstract void. They are formed within particular state traditions, entrenched bureaucratic structures, historical experiences, political institutions, and social values. The same reform principle may generate rapid and deep transformation in one country, while in another it may be implemented in a limited, cautious, or hybrid form. The reason is not simply a difference in political will, but the deeper administrative and cultural fabric.

In this respect, Anglo-Saxon culture and Continental European culture offer two highly fertile axes for a comparative examination of the character, scope, and implementation of New Public Management reforms. The United Kingdom and the United States are of special importance both because they played a central role in the rise of neoliberal policies and because they provided the first and most visible examples of New Public Management in practice. Germany and France, by contrast, experienced the same wave of reform through a different mentality and institutional framework, owing to their strong state traditions, deeply rooted legal-administrative structures, and historical ties to Weberian bureaucracy. A comparison between these two broad administrative-cultural spheres therefore shows not only what reforms were, but also what they became under particular social and institutional conditions.

The central claim of this study is that New Public Management reforms can be explained neither as a wholly universal, culture-free logic of linear progress nor as an exceptional experience peculiar to a single geography. More accurately, the interaction between reform principles and administrative culture is reciprocal. Reforms are constrained, transformed, or reinterpreted by existing cultural and institutional structures. At the same time, reform initiatives can, over time, affect institutional functioning, state-society relations, and patterns of bureaucratic behavior, thereby generating a new administrative orientation. The issue, therefore, is not simply the question of which country carried out how much reform. The real issue is the historical context in which reform was implemented, the administrative tradition within which it operated, and the cultural tendencies with which it produced either harmony or tension.

At this point, culture is treated not as a secondary but as a constitutive variable in this study. Here, culture is understood not merely in the anthropological sense as a way of life or a set of values, but as a framework that shapes administrative behavior, attitudes toward authority, responses to uncertainty, perceptions of hierarchy, relations between the individual and the

state, and reactions to change. Hofstede's cultural dimensions, in particular, do not provide the only tool for explaining administrative differences among countries, but they do offer a functional analytic lens for understanding the social reception of reforms and their institutional feasibility. Dimensions such as power distance, uncertainty avoidance, individualism, masculinity-femininity, long- versus short-term orientation, and indulgence-restraint help explain why public administration reforms are more readily accepted in some societies while they encounter resistance in others.

This does not mean that culture is treated here as a fixed destiny or as a mechanical explanation for administrative outcomes. Culture does not determine reform in a linear way. Rather, it shapes the range of possibilities within which reform is interpreted, resisted, adapted, or normalized. Political leadership, economic crisis, institutional design, and international pressure still matter; yet they operate within a cultural and administrative field that gives reform its practical meaning.

Within this framework, the study first discusses the emergence, development, and principal reform axes of the New Public Management approach. It then examines, through the cases of the United Kingdom and the United States on the one hand, and Germany and France on the other, how different administrative traditions responded in different ways to the same wave of reform. In this way, it seeks to show not only the content of reform policies, but also the cultural and institutional ground on which those policies acquired meaning. The true nature of public reforms becomes visible not merely in statutes or government programs, but in the relationship those reforms establish with entrenched state traditions.

In conclusion, this study aims to read New Public Management not simply as a technical model of administration or merely as a set of market-oriented public policies, but as a field of transformation in which the multilayered relationship among culture, bureaucracy, politics, and reform becomes concrete. A careful examination of the similarities and differences between Anglo-Saxon and Continental European administrative traditions is important because it shows why reforms moved in the same direction but not to the same degree. Accordingly, the study seeks, on the one hand, to contribute a comparative perspective to reform debates in the public administration literature and, on the other, to make visible the points left unexplained by approaches that exclude culture. For what makes reform in public administration lasting, effective, and meaningful is not merely the creation of new institutions, but the ability to read correctly the administrative and social ground on which those institutions will stand.

Section I



1. The New Public Management Approach From Past to Present

In this study, the New Public Management approach, which was built in place of, or upon, the traditional Weberian understanding of public administration, is treated as a paradigm shift, while the steps taken in that direction are treated as a set of reforms, or a meta-policy. This chapter, structured around that basic premise, begins with the antecedents of New Public Management and the processes and policies that prepared the ground for it. It then moves to the character of the approach itself, discussing its first concrete applications and its general policy orientation. In the final part, it examines the reforms referred to as the second wave and their relationship to Hofstede's cultural dimensions.

1.1. Antecedent Developments and Reforms

Although Giddens argues that the state, or the nation-state, does not rest solely on economic foundations, as Orthodox Marxism suggests, and that such reductionism produces misleading interpretations, an economic point of departure has nevertheless been preferred here in discussing New Public Management. That choice stems from the fact that the subject matter is shaped around questions such as *What should governments do?* and *What should the role of the state be?*, along with answers such as the night-watchman state, the allocative state, the distributive state, and the stabilizing state (Jackson,

2016, p. 27). Put differently, although not exclusively, the reform packages introduced by governments were predominantly fiscal in character.

When one speaks of the antecedents of New Public Management, the first developments that come to mind are those that unfolded within capitalism after the Great Depression. The *laissez-faire*, *laissez-passer*¹ economic understanding that had risen against privileged, protectionist, and exclusionary state policies gave way, after the global economic collapse of 1929, to a different understanding (Skousen, 2014, p. 48). At the beginning of the twentieth century, when financial instruments were not yet developed in their contemporary sense, states issued money against gold. But during the First World War countries began printing money without such backing. That process reduced purchasing power and intensified inflation, especially in Europe. At the same time, capital increasingly flowed toward the United States, which had continued to issue currency on the basis of gold. When nearly half of the world's circulating capital accumulated there, the excessive rise of the stock market and of prices led the government to pursue deflationary policies. As production fell, the American stock market collapsed on Thursday, October 24, 1929 (Eğilmez, 2018, pp. 120–121).

The Great Depression, which classical economic assumptions could not explain, produced very high unemployment and a severe contraction of production in the United States. The concentration of capital in nonproductive areas drove prices down, and that sharp fall in prices narrowed the labor market. Despite falling prices, goods remained unsold or were destroyed (Paya, 2013, p. 140). Because the United States occupied a leading position within global capitalism and because markets had already assumed a global character, this crisis—or, more accurately, this devastation—generated destructive consequences in other countries as well (Eğilmez, 2018, p. 119). In fact, economists such as Ludwig von Mises had already warned that easy credit and the continuation of the gold standard would produce precisely such outcomes (Skousen, 2014, pp. 332–333). Yet, because of the dominance of classical economic thinking, the necessary precautions were not taken.

After the Great Depression broke out, extensive debates emerged over its causes and over what should be done. The first response of states was to intensify the old protectionist system. In the United States, Britain, France, and Germany, among the industrial countries most heavily affected by the crisis, imports were restricted, and in some instances customs duties reached one hundred percent in the name of national economic recovery. These economically

1 This expression does not mean that the state does nothing.

nationalist policies were accompanied by quota restrictions (Berend, 2015, p. 85). Alongside these practical responses, theoretical and academic responses also appeared. The most famous, and the most widely accepted, was John Maynard Keynes and *The General Theory of Employment, Interest and Money*. Keynes differed from the classical economists in two fundamental ways. First, he rejected the micro perspective by focusing on macro-level parameters such as supply, demand, and cyclical imbalances. Second, in the debate over whether supply or demand was decisive, he argued that demand was decisive. That second point was especially important for understanding the role and position of the state (Küçükkalay, 2011, pp. 330–331). Keynes maintained that, for crisis to be overcome and the economy to revive, demand had to rise, and that this could be achieved through government spending (Skousen, 2014, p. 395).

The Keynesian call to increase public spending and public investment was highly persuasive under conditions in which financial instruments were preferred to productive investment and in which war had produced high inflation and unemployment. Developments after the 1930s, particularly the Second World War, further demonstrated how useful and how accurate Keynes's theory was under the conditions of the time (Berend, 2015, pp. 100–101). For that reason, classical theory gave way for a long period to Keynesian theory.

Just as the First World War gave rise to a Keynesian, interventionist understanding, the Second World War—breaking out before the destruction of the first had even been repaired—turned the state into a far more visible market actor. The roots of what came to be called the welfare state reach back, in fact, to a series of measures taken by the state under the impact of the Industrial Revolution, in response to Marxist doctrine and to its growing popularity among the masses. In countries such as Britain and Germany, sectors with a distinctly public character and public utility were kept under state control and management (Hughes, 2014, pp. 78–79).

While Keynesian economics and the welfare state were being implemented in industrialized countries, a different strategy took shape in countries that had not completed industrialization—or, more precisely, capitalist transformation—but could no longer be regarded simply as agrarian societies. Just as Marxism helped generate the welfare-state concept in industrial societies, the Soviet threat and the Second World War contributed to the emergence of the developmental state in developing countries. The underlying assumption was that countries that had not gone through the same stages as industrial societies could complete those stages rapidly through financial and fiscal support and

thus adapt to the capitalist economic order (Berber, 2006, pp. 192–200). The very pursuit of that objective reflected the realization, sharpened by the Great Depression and by Keynes, that the world economy had become global and that macroeconomic balances had to be maintained.

In the literature, this developmental state is also associated with import-substituting industrialization. From the 1950s to the 1970s, unlike the advanced countries, it favored a partially closed and protectionist model rather than an open economy, insisting that the state should play an active role in industrial production so that industrialization could be completed (Paya, 2013, pp. 312–313). The foundations of these postwar reconstruction policies were laid through a series of economic and financial agreements. Beginning at Bretton Woods in 1944 and continuing through subsequent meetings, countries reduced the extreme tariff and quota barriers they had adopted in the shock of the Great Depression. The IMF was established to integrate advanced countries into the international financial system, while the World Bank was created to support the economies of developing countries (Berend, 2015, pp. 252–253).

Yet this relatively stable and orderly period began to unravel in the late 1960s. The world encountered, after the two World Wars, a new conflict that was regional in terms of the countries directly involved but global in its consequences: the Arab-Israeli War. What gave that conflict a global character was the fact that the Arab states involved were members of OPEC and reduced oil production while imposing an embargo on countries that supported Israel. The embargo, which began in 1973, struck the American economy first and most severely, but by virtue of economic interdependence it affected all the major economies (Venn, 2002, p. 5).

High inflation, rising unemployment, and the resulting budget deficits subjected the American-led Bretton Woods system to serious criticism (Tayfur, 2014, pp. 192–193). It was argued that the system was no longer compatible with a global vision, that economic issues had to be addressed through a broader political perspective, and that the role of the state—in the form of public spending and foreign aid—was harming the market. Although the oil embargo affected many European countries as well, the heaviest blow fell on the United States, and the questioning of the dollar-centered system was largely explained by America's dependence on oil. In the 1970s countries such as France and Germany relied much more on their own resources, such as coal, while the United States depended on oil in everything from electricity production to transportation (Venn, 2002, pp. 1–2). When the uncertainty and economic burden of the Vietnam War were added to this situation, the

American economy contracted sharply, and revenues diminished in the face of rising costs (Stork, 1975, p. 232).

The first responses to the Oil Crisis included abandoning the dollar's link to gold and readjusting customs tariffs in order to strengthen national economies. Once the crisis environment reached a more manageable point, Keynesian economics gradually began to be abandoned and the assumptions of classical economics began to reemerge. Yet this was not a pure return. Although the state's share in the economy was reduced, a number of regulatory measures continued to follow (Balaam & Dillman, 2015, pp. 235–237).

At this point the Bellagio Memorandum deserves special attention. Hosted by the Rockefeller Foundation in Bellagio, Italy, in 1974, and chaired by Sir Frank McFadzean, a British oil executive at Shell, a group of academics and global entrepreneurs met to discuss the causes of the Oil Crisis, its consequences, and the measures that should be taken. The memorandum that followed argued, in broad terms, that the crisis had created uncertainty in many political and economic areas; that states should continue protectionist policies for a time until that uncertainty was lifted, but that liberalization should then be introduced; that governments should cooperate with private financial institutions to repair the damage caused by the crisis; that international political and economic organizations such as the IMF and the UN should be modernized because they had failed to fulfill their responsibilities; and that cooperation in democracy and development should be pursued through a holistic perspective without distinguishing sharply between developed and underdeveloped countries (Rybczynski, 1976, pp. xxxiii–xxxv).

In short, the memorandum stressed state-private and state-state cooperation, insisted that politics and economics could not be separated, and called for national and international institutions to become more responsive to market conditions. It also advocated global integration and deregulation, together with the necessary institutional adjustments, across all countries regardless of their level of development. It may not be one of the texts most frequently cited in the literature, but it is mentioned here because of the importance both of its content and of its authors, and because it bears a notable resemblance to what in Türkiye came to be known as the January 24 Decisions (Kaya, 2013, pp. 8–9).

These developments matter for this study not because they form a separate economic history, but because they altered the terms in which the state itself came to be judged. From this point onward, the problem was no longer only how the state should intervene in the economy, but whether its own administrative form had become part of the crisis. After outlining

these pre-1980, or more precisely pre–New Public Management, economic developments, it is equally useful to note the administrative developments that accompanied them. These too unfolded in the light of economic change. The Great Depression of 1929 altered not only economic paradigms but also the fundamental policies of the state. Owing to the United States’ place in the global financial system, American national policies inevitably influenced or directed the policies of other states.

As a response to the crisis environment generated by insufficient demand, Franklin D. Roosevelt, echoing Keynes’s view that demand was king, spoke during the presidential campaign of a new order in which public expenditure would be increased in order to reduce unemployment and stimulate production (Jacoby, 1997, p. 36). That campaign promise later gave its name to the Keynesian package of public policies known as the New Deal. Roosevelt expanded the number and range of public works, supported agriculture, subsidized agricultural prices, concentrated on social housing, prioritized rural development, and reduced working hours and workdays. The policies implemented under the New Deal were not limited to these measures; they also included numerous legal arrangements alongside presidential decisions (Rauchway, 2008, pp. 1, 137–142).

The reforms and policies associated with the New Deal laid the foundations for what would become the golden age of developmental administration and the welfare state between the 1950s and the 1970s. Yet it should be stressed that the welfare policies of that period stood in a rather different place, both methodologically and in terms of scope, from the welfare practices of Industrial Revolution Britain and Prussia (Jacoby, 1997, p. 9). Under the influence of the scientific management current, the welfare understanding that rose from the 1950s onward saw development as a social issue and, through a managerial and holistic perspective, positioned the state as a powerful actor in the market on both the production and consumption sides (Brock, 1988, p. 6).

This also shows that management itself was a determining factor. Contrary to common belief, management and the manager were not inventions of the modern world. Although their roots are Latin, their usage goes back as far as the sixteenth century. What is modern is the scientific study of management, which, like the other social sciences, took shape in the early twentieth century, with Frederick Winslow Taylor playing a pioneering and even revolutionary role (Witzel, 2004, pp. 1–2).

It should also be remembered that, in that period, no sharp distinction was drawn between administration and management. Weber’s ideas therefore did not conflict with Taylor’s ideas; in some respects, such as technicality and

controllability, they complemented them. Even so, management was more narrowly focused on work and processes, whereas administration dealt with higher-order policy matters. In the United States, Taylor, and in Europe, Fayol, led a scientific management movement that concentrated on work and process, aiming to obtain the greatest possible output with the fewest resources (Lynn, 2006a, pp. 6–10, 92–95). This produced highly useful results for states during the First World War, and the perceived success of this approach encouraged its adoption during the Second World War and after. Taylorism, indeed, was also considered successful in wartime (Witzel, 2012, p. 226).

The emphasis on war here stems from the fact that war creates circumstances in which the need for production rises sharply while human and material resources remain limited, making efficiency and productivity imperative. Yet the golden age of scientific management between the 1920s and the 1970s cannot be explained only by its advantages in wartime. The Weberian understanding in the public service and Taylorism, together with its successor currents in the public sector, also made possible the successful implementation of meta-policies such as the New Deal, the welfare state, and developmental administration, all of which were marked by planning, centralization, statism, and regulation (Hughes, 2018, pp. 56–61).

In summary, the dominant policy set up to the 1971–1973 Oil Crisis can be described as rigid, hierarchical, centralized, planning-oriented, statist, mechanical, and bureaucratic. Under Keynesian assumptions, and in response to the destruction caused by war, public spending and the range of public services expanded to enormous proportions. The growing scale of public activity once again raised, in a new setting of crisis, the question of what the duties, responsibilities, and powers of the state ought to be (Aksoy, 1998, p. 4; Jackson, 2016, p. 27). Even in the 1950s, when the welfare state and developmentalism were broadly embraced by politicians, criticisms were already being voiced that the state should withdraw from the market, that free-market mechanisms should be adopted, and that bureaucracy had grown to such dimensions that it restricted liberties and reduced efficiency (von Mises, 2010; Witzel, 2012, p. 226).

More plainly, the budget deficits and financial crises generated by the rapidly expanding welfare policies pursued from roughly 1945 until the 1980s, together with many political, social, technological, environmental, and legal factors, brought the old order into question and gave rise to a new understanding of state and economic governance (Bovaird & Loeffler, 2016, pp. 14–17). At the center of this debate stood the concept of market failure, understood as the situation in which incorrectly defined property

rights, externalities, and incomplete information lead markets to generate high transaction costs (Jackson, 2016, pp. 27–28). That definition does not, by itself, cover every area in which public authority differs from private initiative, but it does provide a functional benchmark for comparison.

In the period beginning with the Great Depression and continuing through the devastation of the Second World War and the Cold War, the state intervened actively in markets in order to secure macroeconomic stability, growth, development, fair distribution of income, efficient use of resources, and balance in foreign trade (Aktan, 2005, pp. 26–29). Yet from the 1970s onward, the transition from modern society to postmodern society, changing preferences, rapid developments in information and communication technologies, intensifying international competition, and globalization combined to produce a situation in which modernism in social life, Keynesianism in economics, Weberian administration in public management, and Taylorism in management were all increasingly seen as having exhausted their function (Ateş, 2013b; Vural, 2005).

Still, this transition should not be read in terms of a simple opposition between right and wrong. Thomas Kuhn's reflections on paradigm change are important here. Kuhn (2015, pp. 182–183) described paradigms not through the categories of truth and falsehood, but through opposition, and argued that the struggle between the new paradigm and the old was structured through that opposition. He also noted that such opposition could take on a revolutionary character. Looking back at the 1970s and the years preceding them, one can indeed see that academics and political actors engaged in a struggle with the defenders of the old paradigm.

Why, after roughly half a century of perceived success, did the state come to be seen as having failed, both in markets and more generally, by the 1970s? The answer can be given on two levels, administrative and economic. On the administrative side, Weber, Taylor, and Fayol had developed a paradigm centered on preventing waste and ensuring efficiency, but that paradigm, despite later refinements, proved insufficient in the face of changing conditions. The hierarchy that had been elevated to a principle did not produce organizational productivity in the way promised. Bureaucracy made control possible because it was predictable, yet it could not keep pace with the speed of change. Moreover, the attempt to separate administration from politics and reduce it to a purely technical pursuit was increasingly seen as both invalid and irrational, while the argument of political control proved insufficient from the standpoint of accountability. At the same time, bureaucracy itself appeared increasingly at odds with the democratic ethos of postmodern society, with decision making

concentrated in the hands of a limited group whose members often prioritized their own interests (Hughes, 2018, p. 62).

On the economic side, the idea of market failure was supplemented by the notion of state failure. If the causes of market failure could also apply to the public sector, the public sector also possessed additional causes rooted in its own specifically public character. To understand state failure, one must also consider the instruments of intervention available to the state, because the state's regulations and economic activities are themselves measures taken in the name of the public interest (Aktan & Dileyici, 2005, p. 129).

In this sense, the state possesses four main instruments of intervention: it may procure goods and services through its budget; subsidize private firms so that they produce certain goods and services; itself produce goods and services for sale in the market; and, through its coercive power, regulate certain economic activities by permitting, forbidding, or limiting them (Hughes, 2018, p. 27). Because procurement and subsidy continued to exist even under newer management approaches, criticism concentrated above all on the instruments of direct production and regulation. The production instrument, organized around the question of which goods and services should be produced by the state and which should be left to the private sector, is one of the central themes of this study (Dileyici & Vural, 2005).

The regulatory instrument, by contrast, became the balancing point of reforms carried out in line with New Public Management. Linked to the production instrument, regulation refers to the state's normative activity, undertaken in the name of the public interest, to ensure the smooth functioning of economic life by preventing market failures. This instrument is still widely used today. Yet where private interest is especially strong, regulation can also produce negative outcomes, since politicians or bureaucrats may, through lobbying, protect individual or group interests and thereby prioritize private gain over the public interest. For that reason, the question of where and to what extent the state should use its regulatory authority is an extremely sensitive one (Aktan & Karaaslan, 2005, pp. 97–98; Dollery, 2009, p. 23).

As is clear, this subsection has ranged across many events, ideas, problems, and proposed solutions. Just as the Great Depression generated a general theory through the analysis of the crisis and the assembling of policy proposals, the developments of the 1970s also produced a holistic approach through the explanation of events, the articulation of ideas and policies, and the ranking of remedies. For that reason, it is important to discuss Public Choice theory in some detail.

Governments plan and implement many policies. Yet even when some of those policies are designed in ways that appear relatively flawless and responsive to economic developments, they do not always yield the desired outcomes; at times they produce the opposite. Public Choice theory, defined as a scientific analysis of government behavior and, especially, of individuals' behavior toward government, appears precisely at this point in order to illuminate what had been neglected (Tullock, 2002, p. 3). Although inquiry into the effects of political and bureaucratic actors on public policy can be traced back to the eighteenth century, the theoretical and more formal work associated with Public Choice began in the 1960s under the influence of figures such as James M. Buchanan and Gordon Tullock (1999), drawing in part on the earlier intuition, associated with Pareto, that minorities could guide majorities (Lane, 2000b, p. 206; Mueller, 1997, pp. 1–5).

The issue to which Public Choice theory objected, or on which it sought to provide a new perspective, was the assumption—implicit in much of what had been argued up to this point—that the unmanageable growth of public expenditure and the fact that market failure had come to be regarded as state failure could be solved through policies designed on the basis of that assumption (Dollery, 2009, p. 22). Public Choice redirected attention from policy in the abstract to policy processes, and especially to the actors within them. It argued that those actors shape public policies according to their own interests or the interests of the groups they represent (Clark & Lee, 2013, pp. 5, 8).

This also contained a criticism of Weber's bureaucracy. According to the Weberian principle of impersonality, politicians and bureaucrats were expected to protect the public interest or seek the general welfare (Hughes, 2018, pp. 70–71). In practice, however, that expectation did not hold. What appeared instead was a conflict between private interest and public interest, a conflict that often ended to the detriment of the latter (Buchanan & Tullock, 1999, pp. 282–283).

At bottom, this divergence reflected different understandings of the state. Public Choice theorists rejected the organic-state conception in which the state is primary. In its place they embraced a conception in which individual rights and liberties are primary and the state is built on cooperation. In their words, the state is a contractual enterprise that rests on and reflects the common concerns of individuals. That view stood in sharp opposition to approaches that sacralized public office and public interest (Musgrave, 1999, p. 31).

In short, Public Choice theory rejected some of the principal assumptions of traditional public administration, while, through the emphasis it placed

on the individual and the private sector, it provided an important foundation for New Public Management. At the same time, it made clear that the shift in the economic paradigm by itself could not fully explain the character of contemporary management or public reform; Public Choice completed that picture by explaining the role of actors, incentives, and institutional behavior (Dollery, 2009, pp. 29–30). Put differently, the long process of change that began with the Great Depression and continued through the Oil Crisis was presented in economic, political, and administrative terms in order to show under what conditions New Public Management matured.

1.2. The New Public Management Approach: Emergence and Development

From the First World War to the Oil Crisis, many major economic developments occurred that also affected the administration of the state. The inability of the existing economic and political order to respond to the new social order and to the other developments that emerged as its result made it necessary for new ideas and practices to come onto the agenda and be implemented. As in many public policies, practice developed before the academic literature in New Public Management as well. Yet this should not be taken to mean that these practices were policy sets composed solely of practical measures, detached from a theoretical foundation.

Roughly a decade after the first applications of the New Public Management approach, David Osborne and Ted Gaebler wrote *Reinventing Government* (1992), which is treated as a foundational text. Under the heading of acknowledgments, the authors state that the book is about the pioneers of the new form of governance and their ideas, and that they owe everything to them. These remarks by Osborne and Gaebler show that, even if they had not yet found practical counterparts, many studies aligned with the New Public Management approach had already appeared in the literature. The authors also count Peter F. Drucker among the foremost pioneers, especially because he privileged management over administration.

Although Drucker has highly important works and ideas on management, they are not discussed here in detail because doing so would take us beyond the scope of this section. Yet the following observations and recommendations by Drucker (2013, p. 265) should still be noted:

- That the state should concern itself with its own work and performance,
- That with the end of the Cold War democracies won the peace,

- That the growing corruption and decay in society caused by the collapse of the social state should be halted and reversed,
- That domestic economic and fiscal policies lost because of the failure of the Keynesian state should be brought back under control,
- And that civil society, which is indispensable for political and social stability, should be supported worldwide, especially in former communist countries.

As these points partly suggest, Drucker groups the pre-1980 world into two clusters: the Keynesian order, based on increasing public investment and public production, and the Social State, based on expanding social assistance and services. Despite their differences, both increased public spending and, it may be argued, obstructed civil society, the private sector, individual initiative, and the free market. What may initially seem puzzling in Drucker's emphasis on the Cold War and on the failure of the Keynesian and Social State becomes quite clear when viewed from this perspective. In his view, these two governing approaches damaged civil society and thus produced mistakes and gaps that had to be remedied (Drucker, 2013, pp. 266–268).

After Drucker's account, which can be read as a summary of the pre-New Public Management period, the discussion turns to implementation- or policy-based evaluations, and the subject arrives at Margaret Hilda Thatcher, the British prime minister who first implemented public policies in line with the New Public Management approach (Lynn, 2006a, p. 117). Although some writers argue that New Public Management did not begin with Thatcher, but rather with the IMF's fiscal and economic action packages after the Oil Crisis in 1976, and that it first took the form of reducing cash payments and expenditures (Barzelay, 2001, p. 24), that is, as a continuation of efforts to save the capitalist system (Yıldırım, 2018, p. 253),² New Public Management contains meanings that go beyond such evaluations. According to Lane (2000b, p. 304):

2 As discussed in the preceding subsection on the processes that prepared the ground for New Public Management, global actors are known to have taken certain economic measures within an emergency-action framework. Although these formed a foundation, it would not be correct to treat them as the beginning of New Public Management or as an attempt by the capitalist system to rescue itself. Those actions had the character of economic and fiscal measures limited in scope, rather than that of a coherent and continuous public policy covering the many fields in which states act. It is wrong to confine New Public Management to a purely economic domain. As stressed throughout the first chapter, although economic developments are important determinants, explaining all events on an economic basis is, plainly put, economic reductionism. This leads to the neglect of certain dimensions and, for that reason, to the incorrect evaluation of events and phenomena.

New public management is a general theory about how government can get things done; how government can get services organized and offered to citizens. NPM is not about politics, but about what happens after parliament has decided on the objectives. Its basic claims are that public administration is old fashioned and can be replaced by new public management.... At the end of the twentieth century, it is perhaps interesting to consider a theory that transcends the pure theory of bureaucracy and Weber. Is it really possible to do without it? New public management not only raises political conflict among the political parties in the electorate, but also raises contention among scholars. Some scholars are very much in favour of NPM, whereas others are more traditional, clinging to public administration.

As the quotation above clearly shows, the transformation that began in the late 1970s had not only an economic meaning but also an administrative one. Indeed, it may also be said to have involved social, cognitive, and cultural differentiation. It corresponds to a period in which the modernist paradigm lost its validity and was replaced by postmodernism, which established dominance especially in administrative terms, that is, in public administration, and in the social sphere as well (Ateş, 2013a, pp. 98–101, 2013b; Barzelay & Armajani, 2016, pp. 789–791; Özmen, 2013, p. 77). Put more simply, the 1980s were the years in which not only an alternative to Keynesian economics, but also an alternative to Weberian, or traditional, administration was produced.

In addition, the Washington Consensus is frequently invoked in the literature to support the economic argument. Especially from the 1973 Oil Crisis to the late 1980s, Bretton Woods institutions such as the IMF and the World Bank launched structural adjustment programs aimed at adapting the economies of countries described as underdeveloped to the new economic order. These adjustment programs accelerated when Mexico declared in 1982 that it would be unable to repay its debts, that is, when it announced a moratorium, and they were also seen to resemble the reform packages implemented by British Prime Minister Thatcher and American President Reagan (Şen, 2005, p. 184).

The Washington Consensus may also be defined as the reshaping, in the face of the emerging economic order, of the efforts undertaken after the Second World War, or in other words within the Cold War framework, by the IMF, the World Bank, and countries such as the United States and the United Kingdom, which held leading positions in the world economic system, to develop and integrate the countries they described as second- and third-world countries into the capitalist system (J. Williamson, 2008, p. 16). John Williamson further states that the economic policies implemented after the

Oil Crisis shared common features and could be gathered within a certain logic. Because the sources of those policies were in Washington, he named this consensus the Washington Consensus and grouped it under ten headings: fiscal discipline, the reordering of priorities in public expenditures, tax reform, the liberalization of interest rates, competitive exchange rates, privatization, deregulation, granting property rights to informal assets, and the liberalization of trade and foreign direct investment (J. Williamson, 2008, pp. 16–17).

This consensus, summarized by Williamson in ten points, explains well the largely economic measures taken by states in response to the pre-1980 ruptures. These policies, which may be called first-wave reforms, took shape under Thatcher's leadership, as noted earlier. Alongside privatization, which Thatcher introduced into the literature as a public-economic policy method (Schultz, 2004, p. 337; J. Williamson, 2008, p. 16), many measures of liberalization and retreat from the social state were implemented, including the sale of public housing to tenants, the transfer of some educational institutions to the private sector, and the review of health services. Public employment was also reduced, and a system of hiring contractual personnel on a performance basis was adopted. As a result of these measures in broad terms, the British state contracted by approximately thirty-one percent in the areas in which it delivered services (Koven, 2009, p. 151).

As is clear, the policies and reforms carried out in line with the New Public Management approach and summarized above were not, as has sometimes been claimed, disconnected practices. On the contrary, they constituted a coherent and systematic set of actions and discourses with a theoretical foundation. Indeed, Thatcher is known to have been influenced by the ideas of public choice theorist William A. Niskanen and to have shaped her policies accordingly (Dawson & Dargie, 2002, pp. 37–38; Peters, 2018, p. 302). To offer a general introduction, while public choice theorists focus on the effect of public bureaucracy on the allocation of resources, Niskanen's model claims more specifically that the bureau, together with its administrators and professionals, seeks to expand the qualitative and quantitative dimensions of its units on the supply side (Lane, 2000a, p. 65).

It is obvious that the statements above require detailed discussion. Within the framework of rationality theory, it is unsurprising that every legal or natural person—or even every entity—acts to maximize its own interests. What makes Niskanen distinctive, however, is the part of this general theory that concerns the state and public administration. Put more clearly, Niskanen's basic theoretical approach has two dimensions: state government and bureau management. In the first dimension, he argues that “[state] *government is*

defined by who controls the government and by the economic and fiscal conditions that best serve their interests” (Niskanen, 2008, p. 141). In other words, he draws attention to the fact that the definition changes according to whose interests are prioritized. Indeed, when one thinks of political regime types such as aristocracy, which privileges the interests of aristocrats, oligarchy, which privileges oligarchs, and democracy, which—at least in theory—places the interests of the people first, one can say that this claim has merit.

In the bureau dimension, which follows in parallel with this view of state government and moves from the general to the specific, Niskanen reminds us that public service is delivered through these bureaus and that bureaus display political behavior; he argues that a comprehensive theory of the state can only be constructed if this reality is taken into account. He also approaches both dimensions economically, thereby offering a different perspective on the traditional understanding of public administration and producing an alternative to it (Niskanen, 2008, p. 189). To summarize what has been said so far, Niskanen explains the functioning of the state through the political behavior of bureaus and their members, especially in economic matters.

Of course, it would be wrong to limit the bureau’s drive to maximize its interests only to monetary and fiscal matters. Bureaucrats must also be said to pursue and maximize non-monetary interests such as prestige, power, the ability to rule, and flexibility in hiring (Akbeý, 2013, p. 199). Yet because the New Public Management reforms that began with Thatcher focused on monetary issues due to the fact that public spending had reached an unsustainable level as a result of the 1973 Oil Crisis and various related factors, emphasis came to be placed on the fiscal dimension. At least for the first-wave reforms, this can be said with confidence. Once the fiscal crisis had been addressed, other dimensions came to the fore in subsequent reforms.

Another important point concerns the means by which bureaus maximize their fiscal interests. There are two answers to this. The first is the taxes allocated to them; the second is transfer payments carried out by the state (Niskanen, 1989). In addition, the tax rates and revenues that increased under Keynesian economics, together with public spending and that raised the potential size of both the general budget and the special budgets of bureaus, also triggered the process of maximization (Jackson, 2016, p. 29). Bureaus, or bureaucrats, in fact develop their strategies through these two sources—that is, through the budget. Put briefly and clearly, the budget-making process constitutes the most concrete instrument through which bureau managers and bureaucrats maximize their interests (Hughes, 2018, p. 72).

In this context, bureaucrats, by virtue of power resources such as monopolizing technical knowledge and expertise, can easily manipulate the budgeting process by presenting the costs of public goods and services as higher than they really are, thereby increasing the share allocated to them from the budget. It is also stated that the legislature and/or the executive cannot fully operate oversight mechanisms because of the power resources mentioned above that bureaucracy possesses, and that as a result public resources cannot be used efficiently. Niskanen argues that, in order to eliminate the oversight problem and ensure that budget processes are conducted rationally and efficiently, a competitive method should be adopted, such as forcing bureaus that provide similar services to compete with one another or with private-sector institutions, or creating counter-bureaucracies. In this way, interest maximization that works against the public is transformed into a public benefit, because competition among bureaus or firms seeking the resource lowers costs (Peters, 2018, p. 12). As will be noted in later paragraphs, this proposal was implemented under various names, such as a contract culture and market testing.

Up to this point, introductory remarks have been made on the partly theoretical and partly practical foundations of New Public Management. In what follows, the focus shifts to the leading or mainstream discourses and general principles. Although both academic and popular writing show that the reforms carried out after 1980 were not originally known by a single name, and that in the early period they were often framed more in terms of goals, through labels such as the war against waste or liberal government, the widespread usage—setting aside Osborne and Gaebler’s *Reinventing Government* (1992) in the United States—has been “New Public Management”. Yet this diversity of labels does not mean that the reform packages were inconsistent or lacked common ground. On the contrary, many of the policies implemented after 1980, and especially after 1990, correspond to “a massive trend, highly similar managerial doctrines, and universal management reforms” (Lynn, 2006a, pp. 106–109).

To put it more plainly and to understand matters by going directly to the source of the ideas, Christopher Hood, the pioneer of the New Public Management approach, states that the administrative reforms carried out after 1980 in many countries, especially in Britain, can be gathered around the items summarized below and correspond to a *megatrend* and a doctrinal whole (Hood, 1991, p. 3):

- i. attempts to slow down or reverse government growth in terms of overt public spending and staffing;

- ii. the shift toward *privatization* and *quasi-privatization* and away from core government institutions, with renewed emphasis on ‘subsidiarity’ in Service provision.
- iii. the development of *automation*, particularly in information technology, in the production and distribution of public services; and
- iv. the development of a more *international* agenda, increasingly focused on general issues of public management, policy design, decision styles and intergovernmental cooperation, on top of the older tradition of individual country specialisms in public administration.

It should be noted that, as is clear from the date on which they were written, the common denominators presented above correspond to first-wave reforms. The fact that the state had reached enormous and unsustainable proportions, both administratively and fiscally, made it inevitable that such reforms would be prioritized. Yet, again in Hood’s (1991) formulation, it may be said that New Public Management, alongside fiscally weighted actions, also serves as a guide with specific principles, foundations, and an internal logic, through doctrines such as professional management in the public sector, clearly defined standards and performance criteria, greater emphasis on output control, the shift toward separating public-sector units along U-Form³ management lines, greater competition in the public sector, and a stronger orientation toward private-sector managerial styles.

Of these doctrines, the last three were observed more strongly than the others in the first reform applications. This does not mean that the others were ignored, but it does indicate that these final three came to the fore in the order of priorities. One may also say that this helps explain the view that New Public Management was, in a narrow sense, merely a form of managerialism, an attempt to turn public institutions into companies. To state it openly, evaluations made in relation to Thatcher’s policies were produced quite early and in fragments. As the confusion of the crisis environment receded and policies came to be viewed from a more comprehensive perspective, it became clear that Hood’s seven doctrines formed the common ground of post-1980 public policies.

At the same time, it would be wrong to say that New Public Management can be read and understood solely through the doctrines listed above. One

3 U-Form organization means, in summary, that employees are managed by the unit closest to them, in contrast to M-Form organizations, which are run from a single center. Put briefly, the individual takes orders not from the center but from the unit to which he or she belongs, and that unit is made autonomous in terms of budget as well as of authority and responsibility. For detailed information, see O. E. Williamson (1983).

must also look closely both at the concrete reflections of these doctrines and at the development New Public Management underwent over the years. In this connection, many further qualities may be listed in addition to those already mentioned, including an emphasis on performance, flexible fiscal and administrative structures, performance-based pay, contractual employment, individualized employment contracts, the use of market mechanisms, privatization, and public entrepreneurship (Bovaird & Loeffler, 2016, pp. 14–17).

Taken together, what emerges is a global management paradigm in which the center of public service is occupied not by rules and procedures but by the wishes and demands of citizens; in which rigid rules and regulations are reduced so that room for movement and initiative is widened; in which the role of central government shifts in favor of local and civil actors; and in which the market economy becomes operative (Otenyo & Lind, 2006, p. 503).

In addition, there are approaches that seek to clarify these policies by classifying public reforms after 1980 according to the common features they possess. Since not all of them can be discussed in this study, two are presented as representative examples. The first does not evaluate the policies implemented after 1980 within a single framework; instead, it groups them into two separate categories, an economically based new paradigm—or, in other words, New Public Management—and organizational and administrative traditions (Jreisat, 2001, pp. 540–542). As noted in earlier paragraphs, this classification appears to have emerged from a limited perspective that treated only the “urgent and reactive” policies implemented in the Thatcher era as New Public Management.

However, this should not be taken to mean that every policy implemented after 1980 took shape in line with New Public Management, or that all such policies must be evaluated within this category. In short, it is also wrong to define New Public Management as a “blank canvas” that can be painted however one wishes (Ferlie et al., 1996, p. 10). Every reform and policy reflects the marks of the period in which it was designed. As discussed in detail in the section on the United States, some reform packages implemented before the 1973 Oil Crisis also displayed parallels with New Public Management (Ömürgönülşen, 2013, p. 354).

The second approach, by contrast, groups the public reforms implemented after 1980 in many countries, especially Britain, under New Public Management. In other words, it accepts that these reforms were shaped by a common logic, while also arguing that the policies in question formed different clusters within themselves. This approach groups what it calls reform ideals under

four headings: Market-centered, managerial participation, deregulation-liberalization, and flexible government-management. It should be noted that the market-centered dimension is an economically weighted one shaped around Niskanen's fiscal theories, as mentioned earlier (Peters, 2018, pp. 302–310). Viewed broadly, then, the economic dimension explains only one side of New Public Management reforms. Naturally, one may also speak of other reform and policy clusters besides these classifications, but since they fall outside the scope of this study, only the aspects that are analytically useful are addressed.

What the two approaches share—and where they differ—is the question of whether the post-1980 public reforms led by Britain and described as “neoliberal” (Aksoy, 1998, p. 5) correspond to a coherent set of policies shaped around certain principles, or in other words whether they constitute a paradigm. In the literature, some authors have argued that the reforms gathered under the label of New Public Management are actually only an improved version of practices stretching from Weber to the present. Since the concept of paradigm is itself a subject of debate, and without entering into a detailed discussion, one may summarize paradigm change as the replacement of an old order by a new one (Hughes, 2018, pp. 334–335).

In this sense, and as suggested in the discussion above, New Public Management replaced the basic principles of traditional administration with new ones. Some of these new principles are in fact the direct opposite of the old. The clearest example is the separation of politics and administration. In traditional administration, public employees act only through procedures rather than taking initiative and making decisions. In New Public Management, however, public managers play an active role in the policy-making process and, like politicians, can themselves formulate public policies (Bovaird & Loeffler, 2016, p. 19). This amounts to a formal recognition of a reality that already existed *de facto* through the “power resources of bureaucracy” discussed forcefully in the first chapter but that had been neglected by the traditional approach.

Another argument raised is that the reforms were not universal or international in character but remained confined to a particular geography. More specifically, it was claimed that they occurred only within OECD countries or under right-wing governments. Yet New Public Management found application not only under left-wing or social democratic governments, but also in Africa, Asia, and Latin America, outside the Anglo-Saxon countries (Otenyo & Lind, 2006, p. 503; Peters, 2018, p. 324). In short, New Public Management corresponds to a change and a new order in which the old

paradigm was replaced by a post-bureaucratic, postmodern, and post-industrial paradigm in many different fields (Lynn, 2006b, p. 573).

Alongside the debate over whether New Public Management is a paradigm, the literature has also frequently claimed that approaches such as New Public Governance and Public Value are paradigms in their own right, and that New Public Management has now lost its validity. In fact, it would be more accurate to direct the criticisms aimed at New Public Management toward these latter two approaches (Hughes, 2018, pp. 335–336). Put differently, these two approaches do not differ from the core principles of New Public Management to a degree that would allow one to say that they establish an entirely separate paradigm.

Other criticisms directed at New Public Management may be summarized through the assessments of Dunleavy and Hood (1994) and Lane (2000a). In this connection, Dunleavy and Hood, in order to respond to the criticisms, constructed four groups: fatalist, hierarchical, individualist, and egalitarian. Fatalist criticism holds that problems mostly stem from human nature and will continue no matter what. Hierarchical criticism argues that human beings and nature operate through order and hierarchy, and that the reforms in question would disrupt this order, create chaos, and interrupt public services, which require continuity. Individualist criticism maintains that the reforms cannot truly secure individual initiative and that the public sector will preserve its privileged position at certain points. Egalitarian criticism, by contrast, claims that the reforms corporatize public administration and, in addition, generate weaknesses in public services to the detriment of the poor (Dunleavy & Hood, 1994, pp. 10–12).

This classification is also treated by Hood as a matter of management culture. Accordingly, resistance to reforms that have been or will be undertaken is analyzed within this framework. More precisely, Hood argued that the source of resistance to New Public Management reforms lies in four management cultures—fatalist, hierarchical, individualist, and egalitarian—and that these cultural groupings must be taken into account if reforms are to be implemented successfully (Hood, 1998, pp. 24–27). In this study, however, a method is adopted that is similar in logic to Hood's but differs in emphasis. Whereas Hood preferred a classification derived from the specific resistance directed at New Public Management, this study adopts a more general and inclusive method based on resistance to innovation, change, and reform, using Hofstede's cultural classification.

Returning to the summary of criticisms directed at New Public Management, Lane's (2000a) assessment provides highly useful data. Lane groups the

criticisms⁴ under five headings: That it contains only right-wing ideological views, that it is not new but merely a repetition of old discourses, that it is a manipulative discourse serving particular interests, that it is an inconsistent mixture of popular ideas, and that it is the adaptation of a microeconomic theory from the private sector to the public sector (Lane, 2000a, pp. 6–7). These criticisms and Lane’s responses are also highly useful in clarifying what New Public Management is and is not.

Before concluding the discussion of what New Public Management is, a general evaluation should also be offered alongside the account built around these criticisms. In this respect, New Public Management corresponds to a quality- and performance-oriented approach in management; the improvement of service delivery and functional responsiveness; the institutional separation of public demands, public decisions, and service-production functions; and, wherever possible, the reorganization, liberalization, downsizing, and localization of bureaucratic public institutions in line with technological, sociological, and economic developments (Lynn, 2006a, pp. 106–109).

It is also possible to classify and examine New Public Management according to the shifting points of emphasis that emerged across countries and years. For example, Barzelay argues that reforms concerning what government is and how it should function constitute one variation of New Public Management, while reforms concerning public services constitute another, and he summarizes New Public Management through this distinction (Barzelay, 2001, p. 24). As Barzelay himself indicates, these distinctions also follow a temporal sequence, the first linked to the British experience and the second to the American one. In a kind of inverted-pyramid order, reforms first addressed the macro-level functioning of the state and then moved to the action dimension, that is, to service areas.

Although a period-based examination is useful for understanding the character of reforms, seeing the larger picture requires a holistic perspective. In this regard, the method adopted by D. Osborne and Gaebler⁵, the leading American representatives of New Public Management, may be said to provide precisely this. In the introduction to *Reinventing Government* (Osborne & Gaebler, 1992), they state that bureaucracy, which had been the nearly unrivaled mode of management in both the private and public sectors since the beginning of the twentieth century, had lost its validity in the contemporary world,

4 For detailed information, see Lane, J.-E. (2000a, pp. 6-7). *New Public Management*. New York: Routledge.

5 Although the authors preferred the term *Reinventing Government* to *New Public Management*, it is well known that they addressed the same phenomenon.

and that once the distinction between business and the state is recognized, governments become not procedural but entrepreneurial.

Osborne and Gaebler also set out the principles of New Public Management—or, in their terms, of Reinventing Government—under ten headings and explain one by one what government, or the state, ought to be like (Osborne & Gaebler, 1992, pp. ix–x):

- Catalytic Government: Steering Rather Than Rowing.
- Community-Owned Government: Empowering Rather Than Serving.
- Competitive Government: Injecting Competition into Service Delivery.
- Mission-Driven Government: Transforming Rule-Driven Organizations.
- Results-Oriented Government: Funding Outcomes, Not Inputs.
- Customer-Driven Government: Meeting the Needs of the Customer, Not the Bureaucracy.
- Enterprising Government: Earning Rather Than Spending.
- Anticipatory Government: Prevention Rather Than Cure.
- Decentralized Government: From Hierarchy to Participation and Teamwork.
- Market-Oriented Government: Leveraging Change Through the Market.

As is discussed in detail in the following country chapters, New Public Management—though it had an economic theoretical base—was first implemented by government in Britain, and only afterward did academic studies follow. Yet because applications in the United States developed after Britain, it became possible for governmental programs there to be formulated within the theoretical framework of New Public Management.

Al(bert) Gore, Vice President under President Bill Clinton, prepared a report containing 378 problems and proposals for solutions, one clearly shaped in parallel both with developments in Britain and with the work of Osborne and Gaebler (Gore, 1993). Structured around four pillars — cutting red tape, putting customers first, empowering employees to get results, and cutting back to basics — the report translated New Public Management principles into a concrete governmental program. Under these headings, the report proposed, among other things, simplifying the budget process, decentralizing personnel policy, eliminating excessive regulation, strengthening local governments, introducing competition among service units, making

all employees accountable for outcomes, and reorganizing savings programs (Gore, 1993). The Al Gore report is therefore significant not only because it summarizes the general principles of New Public Management, but also because it demonstrates how those theoretical principles were operationalized as a practical policy agenda.

To summarize, just as every new management approach tends to define the preceding period as one of waste and inefficient resource use, New Public Management likewise argued that Weberian public administration used public resources neither effectively nor efficiently because it privileged procedure, process, and the chain of command, while failing to embrace localization, flexibility, and initiative. In this respect, New Public Management incorporates many new principles aimed at preventing waste and ensuring that more can be done at lower cost through the effective and efficient use of resources. These include transferring policy decisions from central units to local units, placing citizens' needs at the center, loosening rigid rules so as to open spaces for initiative among employees, and encouraging competition both inside and outside the public sector.

Although the summary above is fairly comprehensible at the level of principles, the relationships among the public policies implemented by governments from 1978 onward may not be immediately clear at first glance. Put differently, differences in policy implementation shaped by countries' needs, by the urgency of those needs, and by cultural factors may create the impression that there is no overarching purposive or causal coherence. Yet when these policies are analyzed around the 'basic principles' mentioned above and discussed in many earlier places, it becomes easy to see that they form a coherent whole.

At the same time, it would be wrong to claim that every reform implemented by governments was in line with New Public Management, or that every principle necessarily corresponded to a reform. Governments may have had reform needs for various reasons other than the Weberian model, and some existing practices may also happen to fit the New Public Management approach. For that reason, understanding which reforms stem from New Public Management and which stem from country-specific causes requires a comparative analysis.

1.3. Second-Wave Reforms

The reforms carried out in line with the New Public Management approach, beginning with British Prime Minister Margaret Thatcher, spreading to different countries, and continuing to the present, vary according to certain

factors. Leaving aside differences stemming from countries' internal dynamics, it is possible to examine New Public Management reforms around two main axes by adopting B. Guy Peters's (2018, p. 333) classification. These two axes are referred to as first-wave reforms and second-wave reforms, and the evaluation here proceeds accordingly. Other classifications also exist, of course. Yet because New Public Management reforms constitute not the center but the sample of this study, the more general twofold classification has been preferred.⁶

It may be said that first-wave reform policies were built on granting managers decision-making initiative and/or opportunities to govern, and on reorganizing the structure of administration itself. In other words, first-wave reforms such as privatization and deregulation concern arrangements relating to administration as such. Second-wave reforms, by contrast, focus less on administration itself and more on managers—or employees—such as by expanding employees' authority in decision-making and implementation. In this respect, first-wave reforms form the precondition for second-wave reforms. Put briefly, determining who will govern what and at what level belongs to the first wave, whereas determining how governance will be carried out within the designated domain belongs to the second wave (Peters, 2018, p. 333).

Earlier in this chapter, it was noted that “public reform” may also be evaluated as public policy. From that angle, and in order to view the reform waves from a different perspective, first-wave reforms may be classified under Lowi's policy categories as *regulatory public policies*, while second-wave reforms may be classified as *self-regulatory public policies*⁷ (Theodoulou, 2013, p. 125).

6 Bilal Eryılmaz (2018, pp. 53–54) has addressed New Public Management reforms in three stages: “The first stage, running from 1979 until the mid-1980s, consists of legal-structural liberalization (deregulation) in the public sector, the removal of subsidies on public goods and services, and other austerity measures. The second stage, intensifying from 1985 onward, consists of the privatization of public economic enterprises and of the 3-E policies — Economy, Efficiency, and Effectiveness — named after the initials of the English terms. The third stage, finally, is an open-ended process aimed at improving quality in public administration. What makes the difference between countries is the level of progress each country or administrative unit records in this field”. One may say that the first and second stages in this classification correspond to what B. G. Peters treats as the first wave, while the third stage corresponds to second-wave reforms.

7 As will be seen clearly from the detailed examples of New Public Management reforms discussed in later sections, the state's withdrawal from certain sectors — especially through privatization — made it necessary to introduce certain regulations in those fields in order to preserve the public interest. Such reforms can therefore be classified as “regulatory” policies. Following these policies, under the second wave the state began to implement policies regulating its own internal functioning. For this reason, first-wave reforms are placed under the regulatory (external) category and second-wave reforms under the self-regulatory category. For detailed information, see Birkland, T. A., *An Introduction to the Policy Process: Theories, Concepts, and Models of Public Policy Making* (Routledge Taylor & Francis Group, 2015); Theodoulou, S.

This does not mean, of course, that all New Public Management reforms should be evaluated only within these two categories. Yet the distinction between first and second wave is useful in explaining the reasons for the differentiation that appears between them. As will be discussed later in detail, reforms were generally implemented, according to need, as transformational measures within distributive and redistributive policy categories without a strict temporal separation; nevertheless, the early applications of New Public Management were largely regulatory, whereas as reforms became established and widespread they acquired a more self-regulatory character.

This regulatory reform classification, however, should not be understood as referring to restrictive policies through which the state seeks to bring unregulated areas under its control or to constrain them. As will be discussed later in detail, opening certain goods and services in public hands—especially those that are monopolistic and/or public in character—to competition, or transferring them directly to the private sector, also made it necessary to establish certain regulations in order to safeguard the public interest. Put briefly, the state sought, in the name of the public interest, to remove monopoly in a given field by setting the rules of the market, thereby increasing competition and, with it, effectiveness and efficiency (Anderson, 2003, pp. 8–9).

As concrete counterparts of second-wave reforms, one may list major public reforms such as performance management at the individual and institutional levels, the shift from cash-based accounting to accrual accounting, strategic management, and e-governance, in which e-government and governance are integrated (Peters, 2018, pp. 333–343). It would be wrong to say, however, that all these reforms were first implemented with the advent of New Public Management. Some were practices reshaped in accordance with the needs of the age, while others were applications that had produced successful results in the private sector and were then adapted to the public sector. This too is consistent with the distinction between first- and second-wave reforms. Unlike the previous section, which dealt with the emergence and development of New Public Management, this section focuses on explaining second-wave reforms. This is because the first applications differed from country to country and are discussed in later chapters, whereas second-wave reforms have a more universal character than the first.

In this context, performance management is a concept that appears fixed and easily understandable to all, yet in fact has been defined in many divergent ways and has not produced consensus as to what it is (Eren & Kahraman, 2020,

Z., “In Search of a Framework to Understand the Policy Process”, in *Public Policy: The Essential Readings*, ed. Theodoulou and Cahn (Pearson Education, 2013), 123–133.

pp. 302–303). Performance management may be defined as the steering and/or management of information in order to create value, where performance itself has a meaning centered on output and outcome (Eren, 2020, p. 77). It should also be added that performance management cannot be treated as equivalent to tactical information and management. Rather, performance management is a managerial form—or instrument—in which certain criteria are incorporated into decision-making and implementation processes (van Dooren et al., 2015, p. 20).

The part directly related to the subject of this study is the question of what performance criteria are and on what basis they should be determined. With New Public Management, the effective and efficient use of time, labor, money, and all intangible and tangible components—in short, of all resources—and the reduction of expenditures have become central public goals (Bouckaert & van Dooren, 2016, p. 149). Yet one must not forget that this results-based approach, defined as “achieving more with less”, may not always produce positive results and can, on the contrary, adversely affect efficiency and effectiveness (van Thiel & Leeuw, 2002, pp. 267–268).

Although effectiveness and efficiency carry positive meanings in themselves, concentrating on these two concepts—in other words, on costs—while it may save resources and make it possible to do more with less (Eren, 2020, p. 78), also gives rise to a quality problem (Quenneville et al., 2010, p. 161). Performance management is therefore a managerial instrument—borrowed from the private sector—in which, alongside effectiveness and efficiency, service quality is also taken into account and kept at an optimal level (Verhoest et al., 2010, p. 211). Moreover, experience gained through the application of performance management to the public sector has changed the answer to the question of by what standard effectiveness, efficiency, and quality should be determined. In this context, the focal point of performance has shifted from the relationship between input and output to the relationship between purpose and outcome (Rajala et al., 2018).

Performance management is also a managerial instrument directly related to accountability and transparency. In this reciprocal relationship, performance criteria are both audited through accountability and transparency and, at the same time, make the effective realization of accountability and transparency possible (Taner, 2020, pp. 54–55). It is difficult, however, to call this a full audit. Because performance measurement is carried out through concrete, measurable, and reviewable parameters for practical reasons, the concept of performance is unavoidably drawn toward the financial sphere. Yet even if there is a problem of economic reductionism at the institutional level, one

should not forget that governments are politically audited through elections, civil society organizations, interest groups, opposition parties, and similar channels, all of which evaluate outcomes against national goals (Hughes, 2018, pp. 324–327).

To summarize performance management as a second-wave reform, it signifies moving beyond a process- and procedure-centered approach and, beyond a merely output-centered one, toward a new understanding in which clearly defined policy goals and outcomes are audited within a framework of accountability and transparency. Put plainly, it may be said that a holistic perspective has been adopted in which the outcomes generated by outputs are also taken into account and in which effective monitoring is pursued in political, economic, and social terms (Ateş & Bektaş, 2020, pp. 32–33).

If one evaluates this in light of Hofstede's (2011, pp. 15–16) cultural dimensions, optimal efficiency would likely be achieved in a cultural environment where performance criteria are determined clearly so as to avoid uncertainty, where power distance between positions within the institution is low for the sake of effective oversight, and where there is individual responsibility, resilience in the face of hardship (restraint), patience (long-term orientation), and an entrepreneurial spirit (masculinity).

Another important reform within the second wave is the transition from cash-basis accounting to accrual accounting. Before the 1990s, revenues and expenditures in public accounting were recorded in the period in which they were collected, whereas later they began to be recorded in the period in which they were realized (Küçüksavaş, 2016, pp. 30–31). The crucial point here is the distinction between the emergence of an expense or revenue and its realization. Put differently, there is a temporal difference between the two accounting methods.

Because of its many advantages, accrual accounting may make it possible not only to increase governments' financial resources beyond taxes, duties, and fees, but also to improve the quality and quantity of services, to realize long-term projects, and to establish a fiscally sustainable budget. In this way, it may prevent future expenditures—such as interest on debt, pension payments, health expenditures, and public investments under construction—from producing budget deficits and fiscal-financial crises (Peters, 2018, pp. 340–341). Since accrual accounting requires the creation of short-, medium-, and long-term budgets, going beyond annual or, more precisely, short-term financial planning, it also appears related in this respect to Hofstede's long-term orientation dimension.

Another second-wave reform, strategic management, can be traced back to very early dates, even if not in its present sense, through the concepts of strategy and planning. In this context, strategic planning is known to have been adopted in the public sphere in a broad range of areas, from settlement and housing planning during the rapid urbanization that emerged with the nineteenth-century Industrial Revolution to state budget and labor-force planning during the rise of developmentalism in the 1950s (Bovaird, 2016, p. 58).

In its contemporary sense, however, the concept of strategy emerged in the military sphere. Strategy is the process of correctly assessing resources, in a concise and coherent way and in line with long-term goals, after the competitive environment has been properly analyzed, and of turning this into an effective practice or policy (Hughes, 2018, pp. 222–223). Strategy is also a result of the pressure exerted by postmodern life to make immediate decisions in the face of problems. Put differently, strategy offers managers and employees a framework that helps them make sound decisions in the face of that pressure (Poister & Streib, 1999, pp. 308–309).

Strategic planning, by contrast, corresponds to a design in which, from a perspective that sees the bigger picture and carries a long-term view, the institution's very existence—what it is, what it does, and why it does it—is assessed, and in which its effectiveness, efficiency, functionality, and value are enhanced in the future in line with goals and priorities (Poister, 2010, p. 247). For the purposes of this study, not only what strategic planning is but also how it is created is important. In this regard, strategic planning should be formed on the basis of feasibility and effectiveness, taking into account internal and external factors and the wishes, expectations, and needs of all stakeholders of the institution (Williams & Lewis, 2008, p. 654).

Strategic management corresponds to incorporating strategy, strategic thinking, and strategic planning as a whole into decision-making and administrative processes. In technical terms, strategic management may be defined as the process by which environmental and organizational factors are formulated and implemented in a strategic context so as to develop organizational capacity and increase organizational performance (Poister et al., 2010, p. 525).

For strategic management to function as smoothly and effectively as suggested above, it is tied to three basic principles: Purpose, resources, and action. First, the institution must have a clear view—its mission—regarding its own existential purpose. Then, in line with that purpose, all of its human, economic, social, and financial resources—in short, all its intangible and

tangible assets, together with their strengths and weaknesses—must be subjected to a holistic assessment. After this environmental scan, carried out through the method known as SWOT analysis⁸, an action plan is formed in which standards are formulated and boundaries are set. Naturally, flawless preparation does not mean that the results will be flawless. It is also necessary that employees be willing to implement the designated plan, that managers be guiding leaders, that the organizational climate and environment be suitable and competitive, and that day-to-day and immediate decision-making processes be able to respond as quickly as possible to emerging problems at the tactical level (Hughes, 2018, pp. 223–224).

A careful reading of the discussion above shows that no strong distinction is made here between the private and public sectors in strategic management. This reflects a deliberate choice, but the main reason is that strategic management does not display serious divergence across sectors⁹. In both sectors, especially after 1980, strategic management has evolved from mere planning into a mode of management and thinking that is flexible and open to change (Bovaird, 2016, pp. 70–71).

Strategic management, summarized in broad terms above, was first applied successfully in the private sector for many years and was then introduced into the public sector in line with New Public Management. Because the public sector was unable to realize the transformation that the private sector managed successfully in the face of change, the successful implementation of strategic management in the public sphere made certain reforms necessary. In this regard, one may list structural reforms such as decentralizing institutions around a service-centered understanding and empowering units, establishing market- and firm-like structures, blurring the distinction between the private and public sectors, and strengthening the managerial cadre (Rosenberg Hansen & Ferlie, 2016, pp. 2–3).

The reason strategic management occupies more space here than the other second-wave reforms is that, like New Public Management itself, it aims to convey not only a technical dimension but also an intellectual perspective. In sum, strategic management corresponds to a flexible and results-oriented form of governance with a long-term projection. In that respect, it is suited to New Public Management, standing in contrast to traditional administration's rigid hierarchical structure and its procedure-centered, short-sighted management

8 A classic method of analysis, frequently used in strategic management, in which an institution's Strengths and Weaknesses are evaluated together with Opportunities and Threats.

9 Alongside structural and ontological similarity, however, the differentiation caused by the political environment should not be neglected.

style (Durna & Eren, 2002, pp. 59–61). Evaluated through Hofstede’s cultural dimensions, it may be said that strategic management helps prevent uncertainty because it contains future-oriented plans and projections, and that it offers a long-term perspective because it involves forward-looking moves rather than merely day-to-day tactics.

The final second-wave reform examined here is e-governance, which corresponds to the combination of two important New Public Management reforms: E-government and governance. Developments in information and communication technologies have fundamentally transformed the service-delivery instruments of the state or government and the relations among actors. Moreover, this technology-management integration, which has largely taken the form of transferring public services to the internet, should be said to have minimized such negatives as the bureaucratization generated by the human factor in service delivery, as well as transaction and production costs, while making effective accountability possible (Chadwick, 2003, p. 444; Marche & McNiven, 2003, p. 75; Palvia & Sharma, 2007, p. 2).

The transfer of face-to-face services into electronic environments requires a series of preparatory steps, especially infrastructural work, including automation, informatization, and transformation. In the automation stage, the Weberian bureaucratic mode of management based on “written documents” is abandoned, technology-based work is adopted, and the necessary electronic tools and equipment are procured so that the infrastructure is made suitable. In the second stage, the information required for service delivery is transferred into digital environments. In the third stage, the institutional structure is transformed by redefining duties, responsibilities, and powers in a way appropriate to the new situation (Hughes, 2018, pp. 295–296).

E-governance, in turn, corresponds to the use in state administration of governance—understood as governing together by including all parties likely to be affected by the outcomes of a public policy, or all those targeted by that policy, in policy processes such as formulation, implementation, and improvement, in order to secure maximum efficiency (Loeffler, 2016, p. 208)—through information and communication technologies; that is, it is the integration of e-government and governance. Put briefly, e-governance is the digitalization of governance for the purpose of improving the quality, productivity, and efficiency of public services (Palvia & Sharma, 2007, pp. 2–3).

E-governance also makes democratic values such as participation, accountability, and transparency possible and helps protect them. In this respect, e-governance may also be read as the coming together of e-government and e-democracy (Saxena, 2005, pp. 499–500). Looking at the implementation

of e-governance, one sees that many factors enter the process. In this context, e-governance finds application on multiple levels, from the global to the local, from citizens to the private sector, and from policy making to operational processes and legal regulations (Finger & Pécoud, 2003, p. 7).

E-governance has generated radical changes in public administration¹⁰ and, with ongoing technological development, continues to do so at an ever-increasing pace. Although this highly consequential phenomenon appears related to Hofstede's long-term/short-term orientation and indulgence/restraint dimensions, it is more directly connected to power distance and uncertainty avoidance.

The transfer of basic state-citizen interactions, such as the payment of tax debt, into digital environments minimizes the domination exercised by public officials through state power over both citizens and lower-level employees. In short, through e-governance, power distance within the triad of ruler, ruled, and citizen narrows. In addition, the transfer of data into digital environments makes information easily accessible and processable. This not only makes accountability possible but also allows for healthier planning. In summary, e-governance has the effect of reducing uncertainty and power distance. In this respect, it is likely to encounter resistance where power distance is high and support where uncertainty avoidance is strong.

10 It is of course not possible to limit the effects of e-governance to public administration. As technology takes up an increasingly large place in human life, transformation has occurred — and continues to occur — in cultural, psychological, sociological, economic, political, and many other areas (Peters, 2018). This has, in turn, brought with it the renewed questioning of concepts such as the state and democracy.

Section 2



2. Public Administration Reform in Anglo-Saxon Culture

Anglo-Saxon culture and the countries associated with it occupy a central place in this study because they formed both the core of the neoliberal policies that constituted the economic basis of New Public Management and the first settings in which those reforms were implemented. At the same time, it should be remembered that although New Public Management possessed important economic foundations, practice generally preceded theory, and theory followed after the fact. This pattern can be seen clearly in the cases of the United Kingdom and the United States, which are treated here as the two principal countries of the Anglo-Saxon world.

Britain, in both political and administrative terms, possesses a deeply rooted tradition. As an expansive imperial power, it shaped the governance of many countries and also exerted a formative influence on the administrative system of the United States. It is well known, indeed, that the American political system took shape in opposition to the British Crown. For that reason, while American public administration was strongly influenced by British tradition, it also developed its own distinctive features and thus represents a different strand within Anglo-Saxon culture. That differentiation, moreover, reflected the fact that the United States also borrowed in certain respects from the

other major family of public administration examined in this study, namely Continental Europe, represented here by France and Germany.

After briefly discussing the general administrative traditions of these countries, the following sections turn to the reforms they carried out in line with New Public Management. Before addressing reform policies as such, however, each country's national culture is examined through Hofstede's cultural dimensions. In this way, the study seeks to show how national culture shaped the formation of those policies and influenced whether reforms produced the intended results. That, in turn, helps clarify the role of bureaucratic culture—an almost universal product of Weberian administration—in determining whether reforms undertaken under the banner of New Public Management succeeded or failed.

2.1. Public Reform in the United Kingdom

The United Kingdom is important not only because it was the country in which New Public Management first emerged and developed, but also because, with its ancient governing tradition, it forms the origin of many administrative and political practices. In particular, the structure of the British Parliament, known as the Westminster model, constitutes the first example of the parliamentary system that has been widely adopted in contemporary democracies (Heywood, 2012, p. 399). In the Westminster model, whose origins go back to the Magna Carta signed in 1215 between King John and the barons, the first step in this direction was the limitation of the monarch's powers before a group, or the acquisition by a group of certain powers vis-à-vis the monarch (Asilbay, 2013, p. 251; Bilgin, 2015, pp. 196–197; Fendoğlu, 2010, p. 10). Over the centuries this transfer of power continued in increasing degree and eventually culminated in the creation of the office of the prime minister, first headed by Robert Walpole (Weller, 2014, p. 492).

The shaping of the United Kingdom's ethnic, cultural, and human elements took a long time. Although the English have formed the majority, one should not forget the contribution made in the administrative and political sphere by Scotland, Wales, and Northern Ireland, which, over the course of history, were united under the name of the United Kingdom (Andrews & Levy, 2006, p. 1409). It is also known that the United Kingdom had a global administrative reach especially in the nineteenth century and ruled countries in very different parts of the world for long periods through its colonial policies (Parlak & Caner, 2013, p. 99). Yet after the First World War, the influence of the kingdom on which the sun never set gradually declined and, in some cases, disappeared altogether (Özkurt, 2018, p. 324).

When one examines the political structure, the British Parliament appears as a dual system composed of the upper house, the House of Lords, and the lower house, the House of Commons. Although both chambers have undergone many changes over time, members of the House of Lords, which today consists of clergy and nobility, are determined by a mixed method, both election and appointment, whereas members of the House of Commons are determined only by election. Moreover, although the House of Commons is called the lower house, it occupies the more effective position in political life than the House of Lords (Yayla, 2014, pp. 99–100).

The state structure of the United Kingdom rests, in essence, on a monarchy with centuries of history. Yet because it includes monarchical elements such as the Crown and the king or queen alongside democratic elements such as parliament and a cabinet composed of members of parliament, one must speak not of an absolute monarchy but of a constitutional monarchy. Ultimately, although the head of state is the monarch, the existence of equal citizens before the law, the adoption of a system based on fundamental rights and liberties, the fact that parliament and government are composed of persons who come to office through democratic elections, and the fact that citizens are able to monitor institutions and officeholders through various mechanisms all confirm the constitutional character of the monarchy (Parlak & Caner, 2013, p. 99).

As these remarks already suggest, executive power—that is, political authority—in the United Kingdom is formally dual-headed. It is well known that the governing authority formally possessed by the monarch has, especially over the last century, been exercised by Parliament and government through constitutional convention and statutory development. Put more clearly, the political system may be formulated as one in which the reigning monarch transfers her power of rule to a cabinet responsible to parliament. In short, although sovereignty is fragmented, parliament normally predominates and is the decisive actor in political decisions (Gall & Gleason, 2007c, p. 55). Yet it should also be noted that this parliament-centered conception of sovereignty is unsettled in certain situations by the conferral of extraordinary powers upon the monarch. This has a side that is contrary to parliamentary sovereignty and thus to democratic values, but it also has a positive side insofar as it gives the monarch, or His/Her Majesty's government, the opportunity to implement reform policies rapidly (Karasu, 2013, p. 149).

Viewed holistically, the government of the United Kingdom may be summarized in four clusters: An executive cluster composed of the monarch, the Prime Minister, the Cabinet, and the Privy Council; a legislative cluster composed of the House of Lords and the House of Commons; an administrative-

political regional cluster composed of England, Scotland, Wales, and Northern Ireland; and a judicial cluster. Since the executive and legislative clusters have already been discussed to some extent, it is useful, in line with the scope of this study, also to address the administrative-political regional cluster and the judicial cluster (Andrews & Levy, 2006, p. 1410).

Although the United Kingdom appears highly fragmented, this does not alter the fact that it possesses a unitary system of government. For a variety of social, cultural, economic, political, and similar reasons, the United Kingdom is known to have devolved certain administrative and, at some points, political powers to the geographical regions of England, Wales, Scotland, and Northern Ireland. The status of these specially governed regions should not be confused with that of the states in the United States, discussed in the following section. As the Northern Ireland example shows, the government of the United Kingdom may take back the powers it has granted to local units when the unitary structure is perceived to be under threat (Özkurt, 2018, p. 329).

At this point, the distinction between federalism and the unitary structure becomes important. In broad terms, while in a federal system sovereignty is shared between the central government and local government, a unitary state devolves the power to exercise authority to lower administrative units. In a unitary state, then, the real holder of power and sovereignty is the central government, while local units can exercise authority only within the permission granted by the center, which may take that authority back when necessary (Hague & Harrop, 2004, pp. 228, 236).

The United Kingdom's constitutional order and judicial structure, alongside political and administrative matters, form another important field. This judicial sphere, as it may be called, carries traditions accumulated over centuries. Chief among these is the fact that the British Constitution is not written—or, more precisely, is not gathered in a single text. It may be said that this constitution, composed of statutes, charters, agreements, customs, parliamentary rules and decisions, and judicial precedents, corresponds to the totality of uncodified legal texts (Gall & Gleason, 2007c, pp. 55–56; Hague et al., 2016, p. 110). Because it has not been codified and assembled into a single document, this constitution can be changed more easily in line with needs than written constitutions elsewhere, and thus remains current (Roskin, 2011, p. 37).

Contrary to what is customary and widespread elsewhere, the absence of a constitutional court in the United Kingdom is another matter connected with and complementary to this flexibility. The supremacy of parliament and the absence of a codified constitutional text make constitutional change relatively easy. The fact that statutory amendments cannot be blocked on the

ground that they are unconstitutional further strengthens parliament's hand in legislation and reinforces its sovereignty. Yet it should also be noted that there exists a court called the Supreme Court, which, beyond the constitutional review function associated with constitutional courts, also serves as the highest judicial and appellate court (Yayla, 2014, p. 105).

The course of the relationship between the legislature and the judiciary can be illuminated by examining the transformation over time of the judicial powers possessed by the House of Lords. In the process that began with the establishment of the Department for Constitutional Affairs in 2003 and continued with its abolition in 2009 and replacement by the Ministry of Justice, the control exercised by the House of Lords over the judiciary began to weaken, at least partially. The powers of the Lord Chancellor, who, under that title, directed both the House of Lords and the judicial organization and appointed members of major judicial bodies including the Supreme Court, were gradually transferred to the ministry (Karasu, 2013, p. 150).

These developments, however, do not mean that the influence of the House of Lords has been entirely eliminated. Even under the later arrangements, members of the Supreme Court are selected from within the House of Lords (Yayla, 2014, p. 105). Nevertheless, although senior judicial members continue to be chosen from within an appointed chamber, it cannot be denied that compared with the earlier period there has been progress in the independence of the judiciary (Özkurt, 2018, p. 331).

Everything said thus far about the United Kingdom shows that it has a structure very much its own. Even though it has served as a political, administrative, and judicial model for many countries for various reasons, it has retained this distinctiveness even today. At the center of that distinctiveness lies the relationship among the legislative, executive, and judicial branches. In a setting where the executive is drawn from the House of Commons and the members of the highest judiciary are drawn from the House of Lords, it must be said that Montesquieu's principle of the separation of powers does not apply very well to British politics. As Roskin puts it, what exists instead is more a fusion of powers (Roskin, 2011, p. 37).

If the legislative and judicial dimensions are set aside for the purposes of this study, one may say in summary that the government of the United Kingdom is structured around five main institutions: the monarch, the prime minister, the cabinet, the government, and the civil service (Andrews & Levy, 2006, pp. 1410–1411):

- The monarch is the head of state and the symbolic¹¹ ruler of the executive.
- The prime minister is the head of government and the functional ruler of the executive.
- The cabinet is the collective ruler of the executive.
- The government is the leader, or head, of public administration.
- The civil service is the administrative personnel that implements the decisions of the cabinet and the government.

As these statements also show, even the executive in the United Kingdom does not consist of a single unit but is distributed among multiple institutions. The fact that this occurs within a setting marked by an uncodified and dispersed constitutional order and by statutes that can be altered easily by the legislature also reveals another special trait of British government. In such a complex and multi-actor structure, even if exceptional cases are not denied, the reason affairs proceed with such harmony may be linked to governing traditions and culture extending over centuries.

The earlier discussion of culture suggested that it can ultimately be understood as a strategy or method of survival developed in response to environmental factors, whether internal or external, tangible or intangible. Taken together, these suggest that culture can ultimately be understood as a strategy or method of survival developed in response to environmental factors, whether internal or external, tangible or intangible (Bodley, 2011, p. 10; Smircich, 1983, p. 342). The emphasis on environmental factors shows that, alongside traditions and customs, differences such as geographical structure and location must also become part of cultural analysis. In this respect, because the United Kingdom is an island country and thus did not suffer invasions to the extent seen on the European continent, it is argued that its political and administrative practices displayed relative continuity and thereby acquired a cultural character (Yayla, 2014, p. 97). Indeed, even if only relatively speaking, political and administrative continuity over a given territory can contribute to the formation of a nation. Put differently, despite subcultural diversity, geographical integrity and continuity can generate an overarching culture, that of the nation (Giddens, 2008, p. 161).

11 Being symbolic is a de facto condition. The monarch legally (de jure) possesses, but does not exercise — or exercises only in line with the advice of the prime minister, cabinet, and government — such significant and scarcely symbolic powers as appointing civil and military officials, exercising an absolute veto over legislation, determining defense and foreign policy, and commanding the armed forces (Andrews & Levy, 2006, p. 1411).

Another important factor that secured continuity in the formation of British political and administrative culture was the survival of the English monarchy during the democratizing movements that began with the French Revolution and resulted in the fall of long-standing monarchies such as those of France, Germany, and Russia. In other words, while continental Europe experienced revolutionary ruptures, the United Kingdom preserved its tradition through a relatively soft transformation. This cannot be explained solely by the fact that it ruled an isolated island, but one may also say that the cultural, political, and administrative breaks that arose from the direct physical contact of continental countries with one another were experienced less severely in the United Kingdom because its borders, and thus social mobilization, could be controlled more easily. This enabled the English nation, despite all ethnic and religious differences, to integrate around political and administrative practices (Rose, 1969, p. 83).

From these observations, one may infer that the geographical position and characteristics of states are determining factors in many political and administrative matters. Yet life is too complex for events and phenomena to be explained through a single cause. For that reason, while retaining the geographical factor, it is analytically more useful in the context of this study to proceed on the basis of outcomes.

In this respect, British politics and political culture can be analyzed through four determining components: Deference, class, race, and gender. British political institutions and politicians belong to an elite stratum. Because public administrators are assumed to receive a high-quality education, they also possess social prestige in the eyes of the public as capable problem-solvers. Put differently, the British tend to think that, thanks to the qualifications of public officials, problems can be resolved through political mechanisms, and they generally comply with political decisions. In the United Kingdom, both class consciousness among workers and that of the middle class are highly developed due to the country's historical role as the birthplace of the Industrial Revolution. This too is reflected in politics, and the existence of the Labour Party within the two-party system confirms it. The issues of race and gender that emerge alongside class consciousness, by contrast, are reflected in the low level of minority and female representation in both politics and the public sphere (Kingdom, 2000, pp. 15–18). Even today these remain central themes in political debate, while adequate ethnic and gender diversity has still not been secured in either the cabinet or parliament. It is important to recall that these four components are nourished by British traditions that took shape through continuity and were consolidated over centuries.

In general terms, pragmatism appears to form the principal cultural texture that determines both politics and society in the United Kingdom. This view, which defends practicable policies aimed at producing solutions and securing benefit on the basis of inherited political, administrative, and social experience, constitutes the core of British politics and pushes political parties to shape their programs accordingly in order to survive within a two-party electoral system (Yayla, 2014, pp. 102–103). In short, in British politics, what counts are positions with concrete counterparts that promise to solve problems.

It should also be noted that actors occupy an important place in British administrative and political life. At first glance one may think of members of the royal family and aristocrats. Yet, although an opposite trend is in principle possible, in the current situation what matters in British government is not bloodline but education. In this system, which is claimed to be meritocratic, bloodline has in practice been replaced by college ties or school ties. In the English educational system, what has become important is not which family one comes from but which school one has graduated from. In elite public schools such as Eton, Harrow, Rugby, St. Paul's, and Winchester, students receive more than an ordinary education: they are socialized into the personal behavioral patterns and character traits of an elite stratum, and emotional bonds are cultivated among them so as to create a college-centered network in working life. It should also be stressed that English politics has long been dominated by Oxford and Cambridge graduates, under the label “Oxbridge” (Roskin, 2011, pp. 56–57).

It is often said that, through the transfer of power and authority between the monarch and the Prime Minister and between the House of Lords and the House of Commons, the British state system gradually moved away from its elitist structure and became more democratic. Yet, as the school example above suggests, the traits of deference and class structure in British culture have survived by changing form. More concretely, because these schools are attended mostly by the children of wealthy families of social status, they turn public office—which is formally open to everyone—into an elitist structure and cause democratization to remain largely on paper (Kingdom, 2000, p. 17; Rose, 1969, p. 94). In short, the elite public-school and Oxbridge phenomenon hinders democratization in English politics. This should not, however, be interpreted as meaning that the United Kingdom is not a democratic country. In the end, the United Kingdom must still be counted among the advanced democracies when compared with many others (Özkurt, 2018, p. 325).

Looking at British culture through Hofstede's cultural dimensions is appropriate for the purposes of this study. According to Hofstede's

classification, Britain shows low power distance and low uncertainty avoidance, high individualism, above-average indulgence and masculinity, and a time orientation balanced between the long and the short term (Hofstede et al., 2010, pp. 5–6). These values carry various meanings for administration, both individually and in their interrelationships. Put differently, each dimension, both on its own and in relation to the others, suggests certain behavioral patterns and offers individuals and researchers a basis for making predictions.

In terms of interrelationships, one may say that there is a negative relation between the dimensions of power distance and individualism. That is, countries with high power distance tend generally to be collectivist, while those with low power distance tend toward individualism. Yet it would be wrong to claim that this holds for all countries. For example, Austria and Israel, which have the lowest power-distance scores, are individualistic but also display closeness to collectivism. It is therefore more appropriate to establish a direct relation between power distance and collectivist rather than individualist culture. Indeed, collectivist societies are generally observed to possess a patrimonial organizational structure, meaning that power is concentrated at the top around a father figure (Hofstede et al., 2010, pp. 102–104).

As for the relationship between masculinity and femininity, it is harder to establish a direct connection, though it may be said that the phenomenon of the traditional family signifies something here. As with collectivism and high power distance, patrimonial structure is also a determining component in the masculinity dimension. Put more simply, the father figure in the traditional family forms a point of reference for masculinity. In societies where family ties are looser, or where there is no traditional family structure in the classical sense, masculinity may be expected to be lower. In short, family structure may be determining in the levels of masculinity and femininity (Hofstede et al., 2010, pp. 152–153).

Although the effects of countries' internal dynamics must not be denied, if these are bracketed one may speak of a negative relation between uncertainty avoidance and masculinity. Accordingly, as uncertainty avoidance rises, or as willingness to take risks falls, there is a tendency to move from masculinity toward femininity. Put differently, masculine countries may be said to be more open to taking risks than feminine ones, to experience less anxiety and stress in the face of uncertainty, and therefore to be more moderate and adaptable when confronted with processes of change. Naturally, in making such a generalization one must not forget countries like Japan, which combine a high masculinity score with a highly cautious orientation (Hofstede et al., 2010, pp. 213–214).

Looking at the relation between uncertainty avoidance and individualism/collectivism, and once again setting aside internal factors, one may say that collectivist countries tend to be cautious and experience more anxiety and stress in the face of uncertainty, whereas individualist countries feel more at ease and are, accordingly, more open to change and innovation. It may also be argued that in countries where uncertainty avoidance and collectivism are both high, written rules are more common, and for that reason bureaucratization is more extensive (Hofstede et al., 2010, p. 218).

This relation between uncertainty avoidance and collectivism inevitably brings to mind the concept of patrimonial bureaucracy and government. Defined through the structure and power relations of the family, which is the smallest social and administrative unit in the traditional sense, patrimonialism is an unequal form of rule, resembling a master-servant relation, in which power is concentrated at the top. Because it “relieves” those who are governed of the burden and stress of decision-making, patrimonialism also removes uncertainty. People who simply obey the orders they receive can secure food and livelihood and thus sustain their lives in a relatively safe environment (Weber, 2012, pp. 371–380).

As an example of this, one may cite the doctoral study conducted by Sayın (2006) on Turkish bureaucrats. In that study, Sayın sought to measure bureaucrats’ perception of the state by presenting them with paired concepts such as State–Society, Father–Security, Security–Order, and Assurance–State and examining the congruence between them. These very concepts summarize the link noted above between uncertainty avoidance and collectivism.

As for the final dimension, one may speak of a negative correlation between indulgence and long-term orientation. Put differently, as societies’ desire for personal gratification rises, they make shorter-term plans and place greater emphasis on spending rather than saving. By contrast, individuals in societies with a long-term orientation tend to show a greater willingness toward restraint. This indicates that they give up short-term pleasures in order to place more weight on future investments. Of course, as with other interdimensional relations discussed above, it would be wrong to claim that this generalization holds for all countries. Egypt, for example, combines the shortest-term orientation with the lowest indulgence score. Yet this does not prevent us from speaking of a general tendency (Hofstede et al., 2010, pp. 286–287).

Beyond these pairwise correlations, the Covid-19 pandemic has visibly increased the importance of the indulgence/restraint, uncertainty avoidance, and long-term/short-term orientation dimensions, both individually and in

relation to one another, in public policies, in reactions to policies, and in social events. Numerous scientific studies (Kapoor et al., 2021; Schroeder, 2020; Voegel & Wachsmann, 2021; Wang, 2021) and news reports (BBC, 2021; DW, 2021; Hosbas, 2020; Iddiols & Shelley, 2021) provide data that confirm this interpretation.

Presenting the interrelations among Hofstede's cultural dimensions is important because it helps show what kinds of outcomes the New Public Management approach may produce in practice, both through its own internal dynamics and through local, that is, country-specific, dynamics. For that reason, such an introductory discussion is offered in the section on the United Kingdom before moving on to the reforms implemented in line with New Public Management. The other countries are then evaluated by reference to this discussion, and repetition is thus avoided.

The first reform movement in line with New Public Management began in the United Kingdom when Margaret Thatcher became prime minister. In Thatcher's policies, economists such as Niskanen and think tanks such as the Institute of Economic Affairs played an influential role (Dawson & Dargie, 2002, p. 38). Since the conditions under which these policies emerged and their characteristics were discussed in detail in the earlier section on New Public Management, this section concentrates directly on the reforms themselves.

At the beginning of the twentieth century, the production boom caused by industrialization made it necessary to use human and material capital efficiently and to prevent 'waste,' and traditional management theorists such as Taylor and Fayol likewise took the prevention of waste as their primary goal. Although the methods and concrete actions differed, Thatcher, who came to power in 1979, set out with the same aim: to prevent "waste". According to the general view of Niskanen and other public choice theorists, the source of waste was public bureaucracy. Thatcher's policies were shaped in accordance with this understanding. The absence of a written constitutional order opened up a broad field of maneuver and made it possible to implement reforms in core domains of British public administration, such as the civil service (Pollitt & Bouckaert, 2011, pp. 50–51).

Public expenditures had been rising from the 1950s through the 1970s as a share of national income, and this trend was intensified by the inflationary effect of the Oil Crisis, pushing the British government toward radical solutions. Indeed, if one looks at the ratio of public expenditures to national income between 1979 and 1980, one sees that the decline that had begun in earlier years reached a very sharp level. Once the state abandoned the Keynesian mission of stimulating the market, it was almost inevitable that production would fall

and that painful outcomes such as rising unemployment and inflation would appear in the first phase (Horton & Farnham, 1999, pp. 5–8). The major changes this caused in people's incomes and expenditures also generated social reactions. Since the focus of this study is solely on public reform and public administration, those broader social repercussions are not discussed here.

As is clear from the discussion above, Thatcher implemented reforms that reduced public spending within the enabling setting provided by the British governing system and culture and in line with a market-oriented understanding. This reform package, which began from an interventionist, centralist, and managerialist perspective, took shape in the privatization of public enterprises—that is, the transfer of public companies and holdings from the public to the private sphere (Schultz, 2004). In this respect, important and high-cost sectors most affected by the Oil Crisis, such as energy, steel, public transport, ports, electricity, gas, and airlines, were privatized. Naturally, such a large policy also made necessary a number of institutional changes and meta-policies, such as the Efficiency Unit, Management Information Systems for Ministers, the Financial Management Initiative, and the Next Steps program (Lynn, 2006a, p. 117).

Yet New Public Management reforms in the United Kingdom did not consist only of Thatcher's radical privatization policies. In the sequence of reform waves, the first phase corresponded to reducing costs, the second to devolving the fiscal and administrative powers and responsibilities of central government to lower units, and the third to restructuring the managerial system around performance-oriented, concrete, and rational criteria. Privatizations belonged to the first of these stages. Still, given the scale of the reforms, it is understandable that Thatcher remains the first figure to come to mind when one speaks of privatization within the reform process that continued through John Major and Tony Blair (Farnham & Horton, 1999, pp. 42–43).

Beginning with British Telecom in 1984 and ending with British Rail in 1994, the privatization of major state economic enterprises cut the state's share in the markets by half and generated around one hundred billion pounds in fiscal resources. The politics of privatization did not simply mean the state's withdrawal from markets and the creation of new revenue. By the 1990s, roughly eight hundred thousand employees had moved into the private sector, and in this way the largest cost item of the state at that time was significantly reduced. A reform package with such broad social and political consequences necessarily required substantial support. If one looks at the years in which privatizations were carried out, it becomes apparent that many of them followed Thatcher's third electoral victory. This period marked a milestone

not only for privatization but also for many cultural and structural changes in line with New Public Management (Pollitt, 2006, p. 780).

It would be difficult, however, to say that the strength Thatcher possessed at the center was equally present in local government. Thatcher and other members of the Conservative Party argued that local governments were being run through ideological and political pressure, without financial discipline, without criteria of efficiency and performance, and at a distance from competitiveness and effectiveness, and they complained that because of this public spending was not being reduced to the desired level. Labour Party local officials played a major role in this. Yet despite the major tensions this produced, bureaucratic culture and the rigid hierarchical structure in local government were broken down, and an entrepreneurial culture, a citizen-centered approach, and market mechanisms became established (C. Painter & Isaac-Henry, 1999, pp. 163–165; Yayla, 2014, p. 106).

Alongside the privatization of state economic enterprises, another important reform took place in the field of health. As in every developed country, health services occupy one of the foremost places among public services. In the United Kingdom, health services directly provided by the state have operated actively since 1948 under the name of the National Health Service and within the framework of the social state. As in all other areas, structural problems and irrational decisions had produced an inefficient mode of management in health as well. In public choice terms, doctors, nurses, pharmacists, and other “professional” health workers used their technical knowledge and specialized expertise to shape budgets and expenditures in their own favor in ways contrary to the public interest. In order to correct this, the rigid hierarchical structure was first shifted from the M-Form to the U-Form model and reorganized around services, after which certain health services began to be procured from the private sector by contract (Corby, 1999, pp. 180–183).

After privatization, the second radical reform package introduced by Thatcher was the Next Steps Agency Reform. Based on an evaluation report prepared by gathering the views of all internal and external stakeholders in order to assess the policies implemented between 1979 and 1986, this reform aimed to create auxiliary bodies within ministries for management and implementation. Certain powers and responsibilities belonging to ministries were devolved to these agencies, which were formed along functional and mission-based lines (Kutlu, 2012, pp. 115–117). In this way, the reform sought to prevent the traditional and rigid bureaucratic ministerial structure from resisting innovation and thus to ensure the successful implementation of reforms envisaged under New Public Management. Hundreds of units were

created as a result, and at one point the number of public officials working in agencies rose to as much as eighty percent of all public officials (Horton, 1999, pp. 147–148).

The success and spread of the Agency Reform were due in part to the fact that groups expected to oppose innovation—namely senior bureaucrats and the opposition party—supported it instead. Bureaucrats did so because they believed that the reform would increase their powers, their budgets, and in short their autonomy. A closer look at the reform shows that it was consistent with one of the central principles of New Public Management, namely initiative: it created a structure capable of moving from a hard hierarchy to a more flexible and manageable order. In fact, this was precisely the reform's purpose. Politicians set policy goals in order to solve citizens' problems, while the stages from the formulation of policy to its implementation were left to experts (Kutlu, 2012, pp. 115–117).

The fact that the opposition—or more concretely, the Labour Party—explicitly supported the Next Steps Agency Reform, unlike privatization, stemmed from an ideological shift within the party itself. While the Conservative Party reached broad social constituencies through the discourse of the New Right, the Labour Party, unable to produce anything new beyond opposition to privatization, moved from radicalism toward the center and adopted the discourse of the New Left, or New Labour. This shift was driven partly by necessity, given the Conservatives' repeated electoral victories and the economic conjuncture (Horton & Farnham, 1999, p. 15). Thanks to this transformation within the opposition, the process that had begun under Thatcher and Major continued, even if in a modified form, and contributed to the institutionalization of the reforms (Farnham & Horton, 1999, pp. 42–43).

With Tony Blair's election as prime minister, this line of thought took concrete form under the label of the Third Way. This perspective, which may be summarized as a compromise between the classical developmentalist social-state model and the market-oriented New Right, softened the sharp edges of both sides and built a middle road. Rather than fully subordinating itself to the market, the Third Way also sought to preserve the social state while assigning the state the responsibility of monitoring market mechanisms and remedying their deficiencies. In short, the Third Way sought to establish a ground of compromise among the individual, society, and the state, while also opening spaces of freedom for individuals, local units, and firms. Put differently, it continued the policies of the Conservative Party that had gained acceptance among the public, while revising the policies that had generated

strong reactions and adapting them to the conditions of the day (Ateş & Demirel, 2014).

Of course, it would not be correct to confine public administration reform in the United Kingdom to Thatcher and the Third Way, to examine it only at that depth, and to expect it to represent all reforms. Important reforms originating from the European Union, as well as measures carried out by prime ministers other than Thatcher and Blair, were also implemented (Pollitt & Bouckaert, 2017, pp. 337–341). Yet because covering every reform would exceed the scope of this study, only those core policies that emerged under New Public Management and that illuminate the relationship between culture and reform are discussed. This limitation also applies to the sections devoted to the other three countries.

This study treats the reforms carried out during the Thatcher period as the clearest and most concrete examples of New Public Management in practice and therefore evaluates their relationship with British national culture. In this regard, it may be said that both Thatcher's style of leadership—Thatcherism (Heywood, 2012, p. 436)—and the compatibility between British culture and the principles of New Public Management, played a role in the relatively smooth implementation of these sharp transformations. One may even add that Thatcher's own leadership style was itself compatible with British culture. In short, the compatibility of culture with leadership traits and with the structure of reform is a determining factor in the implementation of reforms.

2.2. Public Reform in the United States

The United States of America is a country that has served as a model for many others in administrative, political, and democratic terms and, whatever the debates over the reasons may be, it has been one of the world's greatest economic, military, and political powers. Of course, this statement may be judged correct or incorrect depending on the time period and point of view. Yet at least under present conditions, this does not alter the fact that the United States remains a decisive actor in world politics and the world economy. In addition, the United States has certain qualities that are, in comparative terms, difficult to dispute, such as being the first modern democracy with the world's oldest written constitution and the founder of the presidential system. At first glance, the fact that it is the first modern democracy with a written constitution may appear surprising for a country that is relatively young compared with the states of Europe. Yet this surprise fades once one recalls that America was built by European migrants (Yayla, 2014, pp. 85, 87).

After the geographical discoveries, people who wanted to make a new beginning migrated from Europe, and especially from Britain, to America. Following this migration, which reached mass proportions, the colonization process began. The indigenous population was ignored, a form of government in line with the Anglo-Saxon tradition was adopted, and the colonies were ruled by governors appointed by the British monarch. Although government was organized according to the Anglo-Saxon tradition, what emerged was still a hybrid structure different from that of Britain itself. The governor, appointed by the king, ruled the colony both with attention to local dynamics and in loyalty to the British monarchy. This arrangement played a key role in shaping American government. The political tradition carried from Britain to the New World, under conditions of intellectual and spatial freedom, allowed a pluralist understanding to take root and eventually resulted in the rise of the American independence movement sparked by Britain's heavy taxation, as symbolized by the Boston Tea Party (Önder, 2018, pp. 61–62). Since the overwhelming majority of the American colonists were of British or European origin and had high political consciousness, it should not be surprising that, compared with Britain's other colonies, they embarked on independence struggles so early and were able to build a democratic regime.

The ethnic and administrative ties of the American colonies demonstrate that the British tradition was also formative within the new political system. Yet this formative effect took shape not in accordance with Britain, but in opposition to it. The new regime, established after the victory in the War of Independence under the name of the presidential system, was designed so as to exclude what were seen as the problematic aspects of British government (Hague & Harrop, 2004, p. 40). One must remember that the British system at the end of the eighteenth century was far less democratic than it is today and that the monarchy was still highly effective. At that time, the monarch held influence over the executive and also over the legislative and judicial branches. In the presidential system, by contrast, the legislative, executive, and judicial branches were accepted as equal and independent. The sharing of power among three equal and independent branches naturally made coordination and compromise necessary, and for this reason negotiation and consensus became key concepts of the new system (Koçak, 2015, p. 23).

In short, whereas the British parliamentary system is characterized by a fusion of powers (Roskin, 2011, p. 40), the American presidential system applies the separation of powers in a very strict and explicit way (Fendoğlu, 2012, p. 41). Moreover, and in connection with this, within the presidential system the executive comes into being within the office of the president, independently of the legislature and through separate elections (Miş et al.,

2015, p. 17). This can be interpreted as a reflection of the British political tradition. The ‘president,’ who holds executive power alone, resembles the monarch in possessing only executive power, but instead of inheriting that office by blood, reaches it by election. Put plainly, the executive was made single-headed and the “choice of the king” was democratized.

As can be seen in broad outline, the American political system—that is, the presidential system—did not emerge, unlike the British political system, as the product of a long historical process, but rather as the result of a political decision taken in light of accumulated experiences. On the basis of these experiences, the advantages of a single-headed executive were accepted, while a conception of leadership was devised in which powers and tenure were limited (Tunçkaşık, 2015, p. 8). At the same time, the division of power into three equal and independent parts made coordination and compromise indispensable. For example, in the policy-making process—which may be seen as the government’s hands and arms—the legislative and judicial branches also possess a say, and many policies cannot be implemented without agreement among them (Warren, 2011, p. 6). In practice, of course, one must add that negotiation is usually conducted by bureaucrats authorized by the president, while the final decision is made by the president himself (Workman, 2015, p. 73). Thus, in the American political system, the separation of powers does not mean a structure in which each branch ignores the others; rather, it means a system in which the branches coexist in coordination.

Another feature, alongside this balance among the branches, that makes compromise necessary is the American party system. Although it is, like Britain, a two-party system, party discipline is looser in the United States, and members and representatives can support positions different from the party line. In other words, even when the majority in the legislature belongs to the president’s own party, different outcomes may still arise (Cheibub, 2007, p. 117). Yet it must also be recalled that the fragmented structure of the legislature strengthens the hand of the executive. While it is quite difficult to achieve agreement in a legislature composed of members elected one by one from separate districts and states, the same is not true of the executive. The president, by virtue of being a single actor, can turn decisions to his advantage (Kamalak et al., 2015, p. 144).

Broadly speaking, the United States is governed not through a unitary structure but through a federal one. This means that legislative, executive, and judicial powers are also shared with lower-level governments, that is, with the fifty constituent states. Because the federated states can shape their own governments freely under the autonomy guaranteed by the constitution,

considerable diversity appears. At the federal level, or in other words at the central level, the executive is represented by the President, the legislature by a bicameral Congress composed of the Senate and the House of Representatives, and the judiciary by the Supreme Court together with federal courts and the courts of the states and local governments. Owing to the rigid constitutional structure, it is quite difficult to alter this distribution of power and authority, both between the federal government and the federated states and among the legislative, executive, and judicial branches. Thus, although lower levels may display flexibility and diversity, the basic structure described above remains almost fixed (Gall & Gleason, 2007d, p. 111; Ömürkünülşen, 2013, p. 295; Önder, 2018, pp. 67–68).

From what has been said, one should not conclude that the American system was from its inception the world's most democratic and majoritarian one. Although even in its 1787 form it was among the most democratic systems of its day, it has taken on its current shape through historical evolution. In the original constitution, a limited electoral system existed in which women and African American citizens lacked the right to vote, and even senators were not chosen by direct election. Only the House of Representatives, albeit through a limited electorate, came to office directly. The system reached its present form through constitutional amendments and additions to the constitution (Schneider & Levy, 2006, pp. 1447–1448). For this reason, the statement made at the beginning of the section—that the American system was a matter of political choice—is partly correct but also partly incomplete. More accurately, the foundations of the American system were laid through political choice and then matured over time into their present form.

Although distinctions based on race, such as Black citizens, and gender, such as women, have been removed from the electorate, the President, unlike members of Congress—that is, the Senate and the House of Representatives—is still chosen indirectly through an electoral college of 538 electors determined according to the principle of general suffrage (Parlak & Caner, 2013, pp. 80–81). Congress itself, which takes office through direct election, consists of 535 members in total: 100 senators, two representing each state, and 435 members of the House of Representatives, allocated according to population figures from the previous decade. In order to make pluralism possible, elections for the Senate and House of Representatives occur at different times both internally and relative to one another. Members of the House are elected for two years, whereas one-third of senators are renewed every two years and serve six-year terms (Schneider & Levy, 2006, p. 1450).

Despite the many layers of this governmental structure, its functioning is notably flexible. This flexibility, made possible by the dominance of a pragmatist culture in public administration, facilitates processes and creates spaces of initiative for managers. So much so that, unless otherwise specified by law, public administrators—whether local or central—possess wide authority within their areas of responsibility. Public services are carried out chiefly by state governments and, in many cases, through the private sector. This has given American public administration a simpler hierarchical structure than that found in many European countries (Ömürgönülşen, 2013, pp. 295–296).

In addition to its governmental structure, American democracy also has a highly layered character. Citizens are able to participate in the policy-making process at almost every level and can make their voices heard (Chandler, 2000, p. 221). The combination of administrative flexibility and citizens' capacity to participate in policy processes helps explain why the United States is perhaps one of the most democratic countries in the world and/or why it possesses one of the most active civil societies (Yayla, 2014, p. 85).

Looking at social culture in broad terms, the impact of America's being a country of immigration is highly visible. When European explorers discovered the continent, a substantial indigenous population was living there, but migration transformed the demographic structure. Although warfare and the number of Europeans arriving to establish colonies were important factors, the most decisive factor was the epidemics caused by microbes carried from the Old World. The indigenous population, lacking immunity to these microbes, declined extremely sharply and, in other words, came close to extinction. All of this produced a cosmopolitan social structure (Diamond, 2018, pp. 245–251).

In the United States, where the population was initially composed mainly of Europeans, demographic diversity increased further as people—largely from what would today be called third-world countries—were drawn not only by broad employment opportunities and high levels of prosperity but also by the attraction of a multicultural environment. Indeed, those born outside the United States came to make up roughly one in every eight people. Despite these changes, the overall population continues to be weighted toward Europeans and Black Americans. Among these groups, and as already suggested by the historical account above, the English remain foremost. Yet, although certain cultural similarities exist, this does not alter the reality that the United Kingdom and the United States are two different countries that happen to speak the same language (Borrego & Johnson, 2012, pp. 32–35).

Just as the negative experiences produced by British rule were decisive in shaping the administrative system, they were also decisive in shaping the

widespread beliefs, values, and attitudes of politicians and society. In this respect, American political and social culture may be summarized around concepts such as freedom grounded in a democratic and constitutional order, majority rule, the protection of minorities, self-government, unity, representation, the rule of law, judicial review, the separation of powers, secularism, tolerance, individualism, participation, and transparency (Henderson, 2004, p. 236). Yet it would be wrong to say that the British experience alone explains the roots of the political system. The Founding Fathers are also known to have been influenced by the ideas of John Locke, who defended property rights, the separation of powers, and the principle that the right to govern belongs to the people (Yayla, 2014, p. 89). In short, the American system emerged as the result of a political choice grounded in philosophical foundations.

According to Hofstede's cultural dimensions, America's national culture is characterized by low uncertainty avoidance, long-term orientation, and low power distance, together with above-average masculinity, very high individualism, and a strong indulgent orientation (Hofstede et al., 2010, pp. 95, 257). When compared with the United Kingdom's values, the two appear largely similar. They diverge, however, on the long-term orientation dimension. From this one may infer that Americans are more respectful of tradition than the British and that they tend to make shorter-term plans. With the administrative and cultural structure thus outlined, one may now turn to public reform.

The increase in public spending generated by the Welfare State and Keynesian economics reached a fiscally unsustainable level with the Oil Crisis, and as in all petroleum-dependent countries this led to radical measures in the United States as well. Ronald Reagan, upon coming to power, implemented a series of policies designed to reduce public expenditures, beginning with the state's role in the economic sphere. Through the first measures, which resulted in the functional and structural downsizing of the state, resources were created, personnel costs were reduced, and production was made more competitive (Kutlu, 2012, pp. 127–128).

America's closeness to a private-sector logic and its market-centered orientation made privatization much easier to accept than in the United Kingdom. Both administrative and cultural factors were decisive here. More clearly put, because federalism, strong local governments, entrepreneurial spirit, and multiculturalism were compatible with New Public Management, reforms were carried out more quickly and with fewer difficulties (Henderson, 2004, pp. 236–237). In fact, it would be wrong to restrict this situation solely to New Public Management. It is also known that many reforms, most of

them in the twentieth century, contributed to transforming change itself into a cultural texture (Sobacı, 2014, p. 121).

There are even views that trace reforms in line with New Public Management back to the period before Reagan. According to this view, President Jimmy Carter took the first step by enacting a public personnel reform package. This system, which encouraged and enabled managers to take initiative, adopted performance as the central criterion in both pay and hiring (Ömürgönülşen, 2013, p. 354). It may thus be said that with this reform, which clearly positioned itself against the Weberian understanding of the civil servant and public personnel, Carter can be regarded as the precursor of New Public Management in the United States.

Yet when one considers American administrative culture, it would be misleading to claim that granting initiative to managers and adopting performance criteria alone were the decisive factors. The American culture of managerialism, business orientation, and support for free enterprise, together with the open and layered structure of public administration, made it easy for successful private-sector practices to be adopted in the public sector as well. Many reforms before Carter, such as the adoption of budget planning and effectiveness management, demonstrate this (Pollitt & Bouckaert, 2017, p. 344). Although in the Reagan era this came to resemble the policies of certain other countries, especially Britain, under the New Right or neoliberalism (Koven, 2001, p. 157), it may also explain why the reforms that remained unnamed until President Bill Clinton came to be labeled Reinventing Government (Kutlu, 2012, pp. 127–128). The fact that many management techniques already existed in practice, with only a few genuinely new methods such as privatization, meant that the reforms represented a rediscovery carried out in a more integrated form suited to new conditions (Sobacı, 2014, p. 121).

In summary, the reforms that came to be named—and thus came to rest on a common basis—with the book written by Osborne and Gaebler (1992) included, as noted above, not only management techniques but also, as in the United Kingdom, innovations such as reducing the public sector through privatization, contracting out services to the private sector (Moussios & Legge, 2001, pp. 145–146), and/or supporting nonprofit institutions working for the public good. In short, unlike the reforms before Carter and those of the Carter period, the reforms implemented under Reagan and Clinton took shape within the framework of Public Choice Theory (Önder, 2018, p. 100).

It may be said that reforms in the Clinton period, as budget deficits reached unsustainable dimensions, were carried out in a more planned and explicit manner after the “urgent and nameless” Reagan-era policies, just as in the United

Kingdom. In this context, Vice President Albert Arnold Gore prepared a report clearly influenced by the work of Osborne and Gaebler (Borins, 2002, p. 184). The report concretized the arguments presented theoretically in *Reinventing Government* and set out hundreds of proposals for solving emerging problems in a manner consistent with American culture and generally centered on the user—customer or citizen—and on entrepreneurship (Ömürgönülşen, 2013, p. 355). Prepared within the framework of President Clinton’s National Performance Review under the motto “putting people first”, the report was organized in stages and contained hundreds of recommendations under four main goals: preventing red tape, prioritizing users, encouraging employees to achieve results, and returning to the essentials through simplification, that is, functional and organizational downsizing (Gore, 1993).

When the reports, publications, and research generated around reform in the United Kingdom are compared with those produced in the United States, a clear difference emerges. Similar to the pioneering role played by Osborne and Gaebler’s work (1992) in America, there appears to have been no official or quasi-official policy or reform guide in the United Kingdom comparable to the Al Gore Report, apart from a few studies by Hood (1991, 1998).

In the United Kingdom, New Public Management reforms may generally be said to have been implemented over time in a manner consistent with the paradigm. Alongside short-term reform packages, one also sees long-term and structural reforms such as *Next Steps*. In other words, the process that began with Thatcher’s arrival in office in 1979 and continued through John Major and Labour’s Tony Blair, albeit with certain variations in each period, displayed a general tendency. In short, British politicians and public managers implemented both short- and long-term reform packages.

In the United States, by contrast, reforms appear to have been more problem-solution oriented and comparatively short- or medium-term in character. This should not, however, lead one to think that the reforms were disconnected from one another, even though their targets changed according to the conditions of the time. On the contrary, they served a common aim—the prevention of waste and the efficient use of resources—through similar instruments employed within the New Public Management framework (Borins, 2002, p. 183; Lynn, 2006a, p. 110). Put differently, whereas the United Kingdom pursued smaller actions in line with a large and common objective, the United States broke the common objective into smaller goals and concentrated on those goals as a whole.

This difference between the United Kingdom and the United States can be explained through Hofstede’s cultural dimensions. When the cultural

characteristics of the two countries are considered together, the clearest divergence appears in the long-term orientation dimension, while the other dimensions are fairly close to one another. Whereas the United Kingdom's score stands around the average at 51 out of 100, the United States, with a lower score of 26 out of 100, tends to plan short- or medium-term policies rather than long-term ones and, out of respect for inherited arrangements, avoids radical change, preserving institutional structures to a large extent while revising them only to the degree required by circumstances (Hofstede et al., 2010, pp. 56–62, 92–97, 138–143, 190–194, 252–258, 280–285). In other words, American policies may be said to consist less of deeply institutional reforms than of public actions whose boundaries and scope are clearly drawn, often moving from public to private solutions and aimed at resolving specific issues such as personnel management (Baldwin & Farley, 2001, pp. 119–120). The difference between the reform and economic approaches of the Reagan and Clinton periods also confirms this (Koven, 2001, p. 161).

There are, however, also views critical of the highly dynamic reform agenda in the United States. Although needs may be addressed quickly, it is argued that in order for reforms to be socially internalized and thus for governance to be secured and reforms to yield their full benefit, one should wait for a certain period and then improve policies in light of their outcomes (Eikenberry & Pautz, 2008, p. 198). It should be acknowledged that the feature that enables the United States to adapt quickly to change also has a downside, as noted above. In some reforms change happens rapidly, whereas in others the shape of reform or its effects emerge only over time. Yet given the cultural, administrative, and historical background of the United States, and given the core character of New Public Management itself, these dynamics seem on the whole to have produced positive results.

The fact that the United States applied management techniques earlier than most other countries, and did not undertake large-scale institutional changes of the British kind, may lead to criticisms that the country had no real reform need and that its policies remained superficial. Yet the fact that, at the federal level, the United States possesses fewer central institutions than unitary states and that some public services were never fully provided by the state from the outset does not mean that the American state lacks a bureaucratic character. Although the range of services—such as the absence of a universal public health service—is somewhat narrower than in many other countries, both the overstaffing of the central government and the organization that takes place at the state and local levels produce a markedly bureaucratic structure. The large number of personnel employed in federal administrative units is especially striking (Peters, 2008, pp. 140–143). This situation, seen by citizens as the

principal source of waste in public resources and one that pushed politicians and managers to formulate policies accordingly, may be said to have been decisive in shaping the broad contours of public reform in the United States (Pollitt & Bouckaert, 2017, p. 344).

Taken as a whole, everything discussed in this section regarding the United States—its political, cultural, social, administrative, historical, and institutional dimensions—may be summed up by the familiar observation that Americans love their state but do not love bureaucrats (Yayla, 2014, p. 85). In short, alongside such factors as an entrenched entrepreneurial culture and managerialism, another important reason for success is that the demand for reform came from below. Moreover, unlike in the United Kingdom, major social reactions against reform did not arise, and this relative ease of implementation may surely also be linked to the vitality of American civil society.

The most concrete example of the impact of civil society—or, more precisely, of its institutionalized form, lobbying—on public policy can be seen clearly in the last period of Barack Obama’s presidency. Lobbying, especially as an economic sector ranking after tourism revenues, occupies an important place in the American political system (Thurber, 2011, p. 363). Events such as the September 11 terrorist attacks pushed security to the top of the American agenda and led gun manufacturers to intensify their lobbying efforts (R. W. Painter, 2010, p. 203). Obama, by contrast, sought to increase transparency around lobbying, which he viewed as one of the main causes of corruption, and to break the pressure lobbying exerted so as to allow greater flexibility in policy making (Coglianese, 2009, p. 534).

Yet despite all of Obama’s efforts, it would be wrong to claim that the influence of lobbying, a traditional institution of American politics, was decisively broken, even if some developments did occur (R. W. Painter, 2010, p. 206; Thurber, 2011, p. 363). Indeed, the policy known as Gun Control, which sought to restrict individual firearm ownership and was criticized as contrary to the freedom to bear arms enshrined in America’s founding text (Baker & Shear, 2013; Esposito & Finley, 2014, pp. 74–75; Spitzer, 2015, p. 66), could not secure enough support either in Congress or in society because of lobbying activity and was therefore rejected (Weisman, 2013).

Another policy of Obama’s that stood in tension with America’s cultural and economic realities was the health reform known as Obamacare. This reform, which envisaged bringing all citizens within the scope of health insurance and having the state cover health services for those without income (Barnett et al., 2013, p. 3), encountered major opposition from many groups, especially

liberals and Republicans, on the grounds that it restricted individual freedoms and would lead to increased public spending (Calmes, 2009). The opposition to this reform, which Obama pursued at all costs, continued even after it was enacted. During Obama's presidency, every effort—from applications to the U.S. Supreme Court seeking the law's annulment to legislative proposals—proved unsuccessful, and the reform remained in force (BBC, 2014; Radikal, 2012).

Yet the health reform that Obama protected through the veto power in his second term, together with other reforms such as immigration legislation, provoked reactions strong enough to contribute to the Democratic Party's electoral defeat (BBC, 2016; Sanchez et al., 2011, p. 3). The opposition to Obamacare, which formed one of the central elements of Donald Trump's election campaign (BBC, 2017), may be said to have found practical expression to such a degree that the reform was almost dismantled altogether (Oberlander, 2017).

In short, both in the cases of Obamacare and Gun Control, Obama's failure to take into account things "specific" to America hindered the smooth implementation of reform. In a country such as the United States, which ranks first on Hofstede's individualism dimension and also has a short-term orientation (Hofstede et al., 2010, pp. 95, 257), it would not be realistic to expect the successful or frictionless implementation of policies criticized for upsetting the balance between freedom and order and for allowing the state to grow and encroach upon the individual sphere (Esposito & Finley, 2014, p. 74; Spitzer, 2015, p. 9).

To summarize, America's cultural, administrative, political, and economic structure is largely compatible with the basic principles of New Public Management, and management techniques were in use in the United States even before New Public Management itself (Ömürgönülşen, 2013, pp. 356–357). Yet the private-sector-centered economic crisis after 2008 led to New Public Management reforms being called into question and to an expansion of the state's sphere of activity (Önder, 2018, p. 100). At the same time, these later reforms, which implied the growth of the state, were not embraced by American society and administration to the same extent as New Public Management and encountered strong opposition.

Section 3



3. Public Administration Reform in Continental European Culture

Unlike the United Kingdom and the United States, where New Public Management first emerged and where market-centered governance gained its clearest early form, the Continental European tradition represented here by Germany and France was shaped by a state-centered and largely Weberian administrative culture. These two countries are especially important because they were among the principal settings in which traditional public administration was formed and refined, and because they continued to provide influential models within Europe. In France, moreover, the centralized and Weberian style of administration associated with the Napoleonic tradition also shaped the administrative cultures of many third countries through colonial expansion.

France and Germany did not remain untouched by the broader New Public Management paradigm. Rather, they integrated that paradigm with their own political, economic, administrative, and cultural differences. The fact that downsizing and marketization did not occur in France and Germany to the same extent as in Britain or the United States does not mean that the reforms did not derive from the same general principles. It means that those principles were filtered through different state traditions, institutional structures, and political cultures. In this respect, the Continental European

cases also provide a response to the claim that New Public Management was merely an Anglo-Saxon export imposed on others.

3.1. Public Reform in Germany

This section, devoted to the Federal Republic of Germany, turns not to very distant centuries, as in the case of the United Kingdom, but to comparatively more recent periods. As is well known, Germany inherited both a governing tradition often summarized through the Prussian School and Cameral Sciences and a legacy of principalities ruled without political unity. Although there were occasional short-lived and instrumental forms of unification at different moments in history, this fragmented structure persisted until the nineteenth century. Germany, gathered under an imperial identity, made the transition in 1870 to what can be recognized as a modern public-administrative structure. Even though their political regimes differed, cultural and geographical proximity played the key role in bringing the German principalities together. It may also be said that this cultural proximity and political autonomy were decisive in producing Germany's present administrative structure (Muratoğlu, 2014, p. 298; Sadioğlu, 2018, pp. 147–148).

Leaving aside the fact that Germany had two different systems of government after the Second World War, one in the East and one in the West, it may be said that Germany has maintained a remarkably consistent mode of government from the imperial experience to the present. With its permanent public-service cadre, tripartite political structure composed of the federal state, the constituent states, and local governments, rule- and procedure-based administration, administrative jurisdiction, and expenditure-centered budgeting system, Germany displays a form of administration that may be summarized as a typical Weberian bureaucracy. At least outside recent years and temporary exceptional moments, it may be argued that it did not undergo a radical and fundamental transformation for more than a century (Jann, 2003, pp. 95–96).

For the reasons mentioned above, this section concentrates on the governmental practices of modern Germany and, instead of offering a historical survey of the kind given for the United States and the United Kingdom, focuses on the most recent political and administrative form. Put more clearly, whereas in the Anglo-Saxon context the analysis centered on government, or in other words on political power and the struggle to hold it, the German case is approached from the standpoint of the state. The theoretical basis of this preference may be said to lie in the Germans' understanding of the "organic state", as opposed to the Anglo-Saxon conception of the public interest (Pollitt & Bouckaert, 2017, p. 61).

The establishment of the Federal Republic of Germany is directly linked to the Second World War. Near the end of the global devastation caused by Hitler, the country was occupied by two different powers and de facto divided into East and West. Four years after this division in 1945, the occupying powers led by the United States, the United Kingdom, and France founded the Federal Republic of Germany in the West, while the Soviet Union founded the German Democratic Republic in the East (Eroğul, 2008, pp. 211–212).

The separation between liberal-capitalist West Germany and socialist East Germany under mandated administrations ended in 1990, when a liberal party was elected in East Germany. East Germany entered the framework of the Federal Republic of Germany in October by shifting to the state system on the legal basis provided by Article 23 of the West German Basic Law (*Grundgesetz*), and political unity was thus restored. After unification, the number of states rose to sixteen and nationwide elections were renewed. Unlike East Germany's brief Soviet experience, the stable governing model adopted in West Germany became dominant in both administration and politics after unification (G. Smith & Gablinger, 2006, p. 479).

In keeping with its cultural inheritance, Germany is governed within a law-based political order. Political and administrative organization is therefore determined to a great extent on a constitutional basis. The German Basic Law (*Grundgesetz*), which falls into the category of written, casuistic, and rigid constitutions, places heavy emphasis on the federal structure, unequivocally forbids measures such as the complete transformation of the states' orders or the abolition of the federal order, and designs all administrative, political, and judicial public institutions in conformity with federalism (Parlak & Caner, 2013, pp. 151–152).

Another determining factor in the German Basic Law is, of course, the Nazi experience. This experience, described as an exceptional accident, is understood to have arisen when the German state tradition fused with popular ideology. For this reason, while preserving the organic-state tradition after Nazism, the final form of the Basic Law was given within a framework of parliamentarism and pluralism, together with legal oversight, fidelity to rules, democratic accountability, and the control of the public sector within liberal and social traditions. In short, this move—meaning the subjection of the German state tradition to legal control—also caused administrative law to occupy a very important place (Jann, 2003, p. 106).

If one brackets the political aspect and focuses on administration, it quickly becomes clear that German federalism differs from American federalism. As members of a common culture, the German states display a more integrated

character than the more separate and variable American states. Put more plainly, the federal state in Germany may be defined as a “union” formed through the transfer of unitary-state powers to the state level. Just as the Basic Law emphasizes federalism, the state constitutions also emphasize that they are members of the federal state, thereby displaying reciprocal commitment (Muratoğlu, 2014, pp. 304–305).

The fact that Germany’s administrative structure operates through relations among member states may, when viewed in the context of the European Union, be said to constitute another important factor explaining Germany’s leading role, alongside other determinants (Oğurlu & Felekoğlu, 2019). The sharing of sovereignty between the federal state and the constituent states means that more than one sovereign can rule across overlapping geographical areas. Although legally defined spheres of competence and responsibility largely prevent conflict among these sovereigns, it should also be remembered that in certain situations the federal state may intervene in the decisions of the constituent states (Muratoğlu, 2014, pp. 304–305). This, in turn, may be interpreted as corresponding to the supranational structure of the European Union and to the way member states preserve their sovereignty vis-à-vis it. The reason for stressing the German federal system and the distribution of authority among the “member states” to this degree is to identify correctly which spheres belong to the national level and thus to assess properly the relation between New Public Management reforms and national culture.

In Germany, the legislative, executive, and judicial powers are divided with the constituent states in a dual structure appropriate to federalism (G. Smith & Gablinger, 2006, p. 481). Since this study focuses on the national level, the local-government tier is not examined in detail here. When one compares the two administrative traditions more broadly, the unitary structure of the United Kingdom concentrates a highly elaborate institutional architecture at the national level, whereas the German federal system distributes much of that complexity to the constituent states, leaving the national tier comparatively leaner. Given the principles of localization and devolution of authority, it may be said that German federalism is at least compatible with New Public Management in this respect.

Although Germany consists of sixteen separate states, it displays relative coherence in national politics. In the political field, a limited number of parties operate, such as the Social Democratic Party of Germany (Sozialdemokratische Partei Deutschlands, SPD), the Christian Democratic Union (Christlich-Demokratische Union, CDU), the Christian Social Union (Christlich-Soziale Union, CSU), the Free Democratic Party (Freie Demokratische Partei,

FDP), and the Greens (Die Grünen). In terms of political weight, however, it may be said that German politics has largely been shaped by the Christian Democratic Union, the Christian Social Union, and the Social Democratic Party of Germany (Gall & Gleason, 2007b, p. 107).

Another determinant of German politics is the party and electoral system. In light of the painful Nazi experience, the Parties Law may be said to maintain strict discipline and oversight within parties. Under the personalized proportional representation system, each voter has two votes. Half of the Federal Assembly is elected directly by voters through a majoritarian formula, while the other half is determined, as in U.S. presidential elections, through an electoral mechanism chosen by voters. Parties that fail to cross the five-percent threshold at the federal level cannot send representatives even if they receive high support at the state level (G. Smith & Gablinger, 2006, p. 482).

The Federal Council, which represents the states, resembles the United States Senate in structural terms, but differs in the way its members are determined. Members of the Federal Council consist of state-government officials or their representatives, that is, they do not come to office through direct election. In any case, apart from the requirement that constitutional amendments obtain a two-thirds majority in the Council and the fact that the Council's president acts on behalf of the President of the Republic in his absence, the body does not possess very extensive powers (Akin, 2013, p. 368).

Taken together, the observations above suggest that German federalism stands at a point quite different from American federalism. Cultural and political experience in general, and parliamentarism in particular, are decisive here. The fusion of federalism and parliamentarism within the German tradition creates the impression of a system that appears federal in form but unitary in practice. Viewed holistically, Germany may be said to possess, despite being federal like the United States, a very strong example of devolution¹² resembling that found in the United Kingdom.

When the implementation stage of New Public Management is considered, attention turns to central government. In the German case, this corresponds to the federal level of government or executive power, where the Federal Chancellor¹³ and the federal ministers are the most important and most effective

12 Devolution refers to the central government's transfer of some of its powers — including certain legislative and executive powers — to a local authority. The local authority can freely carry out legislative and executive activity within the area so defined. Catalonia in Spain, and Wales, Scotland, and Northern Ireland in the United Kingdom, are governed by this method (Hague et al., 2016, pp. 184–185).

13 Since the German case is being discussed, “Chancellor” and “Minister” refer to the Federal Chancellor and federal ministers. Because the state (Länder) level is not the focus, the qualifier “federal” is omitted below for ease of reading.

institutions. The chancellor, as a result of parliamentarism, is chosen from within the Federal Assembly by the President of the Republic and takes office after receiving a vote of confidence by an absolute majority of the chamber. Ministers are similarly appointed by the President upon the chancellor's proposal. A government formed in this way falls only if an absolute majority of the total membership of the assembly votes no confidence. Although ministers possess autonomy within their own ministries, they formulate and implement policies under the coordination of the chancellor (Karatepe et al., 2018, p. 23).

Despite the impression that executive power is equally distributed and that the chancellor is merely first among equals, this is not how the system operates in practice. The fact that ministers are responsible not to parliament but to the chancellor, that the vote of confidence is given to the chancellor personally, that a “constructive vote of no confidence” (*konstruktives Misstrauensvotum*) can succeed only if an alternative candidate is simultaneously proposed (Eroğul, 2008, pp. 236–237), and that the chancellor is the sole actor in establishing ministries other than Foreign Affairs, Interior, Justice, Finance, and Defense and in determining their powers and responsibilities all strengthen the chancellor's hand vis-à-vis both ministers and parliament. Unlike the parliamentary history of Türkiye, the fact that only a limited number of chancellors have served since 1946 also confirms this (Parlak & Caner, 2013, pp. 160–161).

In broad outline, Germany's federal public-administration structure consists of top-level, upper-level, middle-level, and lower-level federal units. The top-level federal units, constitutionally guaranteed, provide direct federal public services such as border security, finance, foreign affairs, and the military; upper-level units, by contrast, are based in the capital without territorial branches and provide services such as patents and statistics. Middle- and lower-level federal units are exceptional and are created when needed (Akin, 2013, pp. 375–377; Karatepe et al., 2018, p. 26).

Yet the relative administrative simplicity of the federal level does not reveal the profile of the country as a whole. Unlike the federal government, the state administrations possess a markedly bureaucratic structure. Eroğul (2008) explains this by arguing that the center is dominant in legislation, whereas the states are dominant in execution. More clearly, federal units set the policies to be implemented and their guiding principles, while the states carry them into effect. As a natural consequence, the states also spend a very significant share of the budget (Eroğul, 2008, pp. 236–237).

Viewed as a whole, the observations above make it possible to speak of a resemblance between German federalism and the Next Steps Agency Reform

in the United Kingdom. As will be recalled, in that reform the ministerial structure was reduced and confined to policy making and principle setting, while implementation was transferred to semi-autonomous units. Unlike the United Kingdom, which implemented this reform under New Public Management, Germany did not need such a move because of both the Nazi experience and its earlier political experiences.

This should not be taken to mean that the United Kingdom is more bureaucratic than Germany. One must say that, although Germany displays a relatively lean structure at the federal, or national, level, the state level continues to exhibit a pattern very much in line with the traditional Weberian model. One may ask why all these examples have been presented. The answer is that they show that the claim that New Public Management and the German administrative system are diametrically opposed does not in fact reflect reality.

It was noted earlier that, alongside institutions, the cultural texture is also a determining variable in the shaping of reforms (Howlett, 2002, 2003). Following the institutional evaluation, then, one must turn to the other determining factor, namely German culture and its reflections in administration. The near-unanimous view among scholars of political culture is that German culture takes shape around respect for and obedience to political authority (Yayla, 2014, p. 127). The roots of this commitment, conceptualized as German discipline, are known to reach back to the Prussian period and to Cameralism (Usta & Akıncı, 2018, p. 82).

As will be noticed, the section on the United Kingdom went back as far as the thirteenth century and examined British state government as something that matured over a very long historical period beginning with the Magna Carta. The section on the United States likewise, by stressing the United Kingdom's influence, discussed a similarly long accumulation and its consequences. In contrast, the present section on Germany gives emphasis to comparatively more recent history. It should not be forgotten that, despite its entire cultural inheritance and the dominance of that inheritance, the current German state structure was shaped in practice in the post-Nazi period by the Western Allies.

In light of the information above, it would also be wrong to think that German reality was constructed only through the developments of the 1950s. German politics and administration, although shaped by the Allies after the Second World War around a pluralist, participatory, democratic, and federal model so as to prevent the recurrence of a catastrophe similar to Nazism, must still be understood in light of the enduring predominance of the *Rechtsstaat*, that is, the rule-of-law tradition. Unlike the United Kingdom, where constitutionalism developed against monarchy, in Germany a rule-based

governing tradition strengthened into a bureaucratic-authoritarian structure. This became even more entrenched within the imperial order and produced a non-participatory society oriented toward obedience to authority (Almond & Verba, 1989, p. 36).

In short, the political and administrative structure of the Federal Republic of Germany does not rest on a single, simple cultural texture but on a hybrid and layered one. Put differently, in Germany one sees simultaneously the absolutist mode of government formed around the idea of the organic state, which corresponds to state-society integration, and the republican order shaped by the two occupying forces, liberal democracy and socialism.

One may also speak of the social reflections of this political division. Roskin, shifting from a state-centered to a society-centered reading, conceptualized this fragmented structure in Germany as a split German personality. In his view, Germans display a disciplined, hardworking, and productive character in both work and private life—realism—while at the same time living with a nostalgic attachment to communal spirit and to the dream of a Great German Empire, that is, romanticism (Timmins, 2000, p. 75). The Nazi catastrophe itself is thought to have arisen from this personality suspended between reality and dream. In short, if it is not controlled, the combination of the Reich fantasy and German industriousness may produce destruction on a global scale (Roskin, 2011, p. 251).

When the realism-romanticism duality is analyzed from another angle, the “liberal democratic” model introduced by the Western occupation powers may also be interpreted as an attempt to create a “new nation” and, as a natural consequence, to change Germany’s political culture. These structural transformations, undertaken in the name of denazification, produced a hybrid condition in which both cultures coexisted, one that in some respects even resembles a postcolonial situation. Yet both changing a society’s culture wholesale and denazifying the country are tasks that require extraordinary effort and time. Once one adds the fact that the newly constructed culture must also be internalized by one or two generations, the magnitude of the undertaking becomes even clearer (Verba, 1969, pp. 130–132).

In short, it must be emphasized that the attempt by Western states to construct a new nation and a new political culture could succeed only over a long period of time. At first glance, and within the scientific climate of the 1940s, it may have seemed plausible to imagine that everything and everyone would transform overnight once the institutional structure was changed. Yet contemporary studies stress that institutional change must be accompanied by a societal transformation at the national level in a domain such as culture.

Indeed, contrary to the expectation that liberal tendencies would dominate after one generation, fascist and racist discourses (Castles, 1984, pp. 37–38) and far-right political formations (Wilkinson, 1995, p. 84) reappeared. The discourse of the guest worker directed against Turkish laborers—the “new Jews” (Wagner et al., 1989, p. 562)—first turned into the discourse of the unwanted immigrant (Dastidar, 2001, p. 1007) and then into murderous violence, such as the Solingen tragedy, which resulted in the deaths of five Turks (Gurr, 2000, p. 155; NYTimes, 1993, p. 30).

General evaluations of German culture become more meaningful when viewed in light of Hofstede’s cultural classification. Taken one by one, the dimensions show that, like the United Kingdom, Germany also has a low power-distance score (Hofstede et al., 2010, pp. 95, 257). Low power distance indicates that lower-level managers and employees are also able to participate democratically in decision-making processes, to a degree that varies with the score. In this respect, participation in decision-making in Germany may be said to be organized around pluralism. The federal structure and the autonomy of the constituent states and local-government units may be seen as concrete reflections of this.

Although Germany scores above average on individualism and is therefore more individualistic than some countries, it should still be said that, in comparison with the United Kingdom and especially the United States, it also retains a markedly collectivist element. On the basis of this score, then, even if Germany may be described as an individualist society, it would be wrong to conclude that the individual always comes before society. On the masculinity dimension, Germany, with a score above average, stands out through a results- and performance-oriented, entrepreneurial, competitive, and rational character. Yet, as with individualism, one cannot speak of an extreme masculinity. Even if the competitive aspect is prominent, it should be remembered that in some areas it recedes into the background (Hofstede et al., 2010, pp. 56–62, 92–97, 138–143, 190–194, 252–258, 280–28).

When one turns to uncertainty avoidance, one of the dimensions most relevant to the success of New Public Management reforms, Germany appears to have an above-average score. In this respect, one may say that Germany follows the widespread pattern of shaping its administrative practices through the traditional Weberian model, that is, by taking legal regulation as its guide. When considered together with individualism, uncertainty avoidance fits quite well with Weber’s theory of rational/legal authority and bureaucracy. Put more directly, above-average levels of both individualism and uncertainty avoidance correspond to bureaucratic administration. This becomes possible

because the rationality linked to individualism is combined with the legally defined distribution of powers and responsibilities (Hofstede et al., 2010, pp. 56–62, 92–97, 138–143, 190–194, 252–258, 280–28).

One of the two dimensions that most strongly shape Germany's cultural character is long-term versus short-term orientation. With its very high long-term score, Germany does not appear institutionally bound to the past; instead of preserving institutional structures and solving problems through narrow and short-term plans, as in the United States, it tends to undertake long-term and comprehensive plans. In other words, German culture is highly open to deep institutional changes, that is, reforms, in order to solve problems. Germany's political and administrative transformations over the last few centuries constitute concrete examples of this.

Another dimension shaping Germany's cultural character is indulgence versus restraint. In this dimension, which concerns the priority given to personal comfort and pleasure, lower index values indicate that individuals are more tolerant of restrictions on their personal comfort in unusual circumstances. In short, this may be summarized as an ability not to feel threatened under conditions of restraint, and it is among the defining traits of German society. In public-administration terms, Germany's score of 40 suggests that employees can bear the pressure generated by reforms that require departure from what is familiar. Indeed, during the pandemic that emerged at the end of 2019, when individuals were subjected to various restrictions in both public and private life, the Germans' cultural disposition in this regard was often observed with admiration.

In Hofstede's account, which explains nearly all the dimensions of German culture, the dimensions of long-term/short-term orientation and indulgence/restraint are of special significance for public-administration reform. Taken together, they suggest that even a difficult process involving long, complex programs of change requiring deep institutional transformation, and actions that threaten people's comfort zones, is not especially hard for German society—at least from a cultural standpoint. Put more plainly, Hofstede's findings indicate that Germany is culturally open to change. These cultural indicators should not be read as direct predictors of reform success. They are better understood as clues to the social and administrative conditions under which reform becomes easier to justify, harder to resist, or more likely to be translated into a particular institutional form.

Once Germany's political, administrative, and cultural structure has been examined, it becomes analytically more meaningful to examine the reforms implemented—or intended—in the country within the New Public

Management framework through the lens of culture. Like every country integrated into capitalism, Germany has periodically implemented, and continues to implement, political and administrative structural reforms in line with socio-economic transformations in the world. Since the developments beginning with the Great Depression of 1929 and continuing through the Second World War and the Oil Crisis were already examined in the sections on the United Kingdom and the United States, Germany's structural changes in those periods are not revisited here.

In the 1970s, which constitute the classic starting point of New Public Management reforms, Germany, like other Western countries, also began to criticize the growth of the state through the concepts of rising public expenditures and state failure. Neoliberal experts whose views had not previously been taken seriously became influential in shaping public policy. Neoliberals argued that the cause of the state's excessive public expenditures and economic failure lay in "bureaucratization". In this respect, views emerged calling for the traditional bureaucratic structure, which designed rules on the basis of assumptions disconnected from reality and imposed them on employees, to be reduced to a minimum, and proposing the simplification of the rigid and highly detailed normative order (Jann, 2003, pp. 95–96).

The welfare-state orientation of the 1950s combined with Germany's Rechtsstaat tradition made German administration—already to some extent bureaucratic in line with traditional Weberian administration—even more bureaucratic. Before the 1970s, the German administrative system acted both as planner and implementer. Yet from the beginning of the 1970s, especially with the adoption of American-style budget planning, the upper bureaucratic structure at the federal, state, and local levels began to evolve away from implementation and toward guidance and rule-setting (Seibel, 2006, p. 765).

Although the example above offers some small clues pointing toward the functional shrinking of the state, it would not be correct to treat it as a full precursor of New Public Management. Reforms of the New Public Management type are encountered only in the late 1980s and early 1990s. The main body of Germany's classic rigid and hierarchical administrative structure is formed largely by the federal government and the state governments. It would not be right to say that the local-government units, that is, the municipalities, possess structures as complex as these higher tiers (Schedler & Proeller, 2002, pp. 170–171). This may be explained by Germany's being at once both a federal state and, in many respects, a centralized one.

The relatively simpler structure of local governments in comparison with the other administrative tiers is important from the standpoint of New Public

Management reforms. The reason is that the reforms implemented after 1980 were carried out mainly by local governments, that is, municipalities. Referred to as the *Neue Steuerungsmodell* or New Steering Model—echoing Osborne and Gaebler’s formulation that government should steer rather than row (Osborne & Gaebler, 1992)—this reform movement represents the transition of local units from a procedure- and process-centered administrative understanding to a market- and results-oriented managerial one. Although municipalities bore the main weight, it is also clear that the states themselves implemented reforms within the framework of the New Steering Model. In short, New Public Management reforms proceeded mainly from municipalities upward to higher administrative layers (Franzke, 2008, p. 81).

In German reform history, where the first wave was constituted by democratization reforms after Nazism, the New Steering Model reforms make up the second wave. Beginning as a transfer of powers from the states to local authorities, the reforms developed broadly along the axis of legal liberalization and market opening, ranging from the reorganization of the budget system around efficiency and effectiveness to the implementation of liberal, market-centered policies in line with the Maastricht criteria of the European Union (Lynn, 2006a, p. 122).

It is nonetheless striking that reforms clearly in line with New Public Management appear only at a rather late date, around 1995. There are many reasons for this, but the most dominant is reunification with East Germany. The liberalization of East Germany, which had long been governed within a Soviet administrative and economic system, and its integration into the capitalist economy was a highly difficult process. Moreover, when one sets the socialist system of East Germany—where the entire economic sphere belonged to the state—next to New Public Management, which implies the withdrawal of the state from many fields of economic production and its retreat to the bounds of the minimal state, it becomes clear how difficult the post-1990 process of liberalization and downsizing was for united Germany compared with the Federal Republic before reunification (Derlien, 2008, pp. 171–172).

After the partial reform movement of 1995, the first serious reform initiative came in 2003. At the federal level, this initiative focused on simplifying ministerial legislation, including statutory law itself. It is known that this reform movement, launched in order to remove the confusion and conflicts of authority generated by nearly one hundred statutes and circulars, has not yet fully concluded and continues in the present (Karatepe et al., 2018, p. 24).

Following this reform, a package called Agenda 2010 was created, containing many far-reaching changes such as the wider diffusion of business principles

and governance, the reduction of the fiscal burden borne by the state in the social-security system together with increased financial obligations for the private sector and citizens, the strengthening of local-government revenues, and the further devolution of authority. Alongside reform headings such as the modernization of Germany's e-government and personnel systems, there were also serious privatization efforts in line with the New Public Management paradigm from the early 1990s onward. Over a period of more than ten years, Germany reduced the number of public economic enterprises in which it held one hundred percent ownership from 214 to 144 (Akın, 2013, pp. 386–391).

From the discussion above, it is quite clear that Germany has not experienced a reform movement as intense and dynamic as that seen in the United States and especially in the United Kingdom. In summary, while Germany's New Public Management initiatives may appear limited when compared with the Anglo-Saxon countries, they continue to exist over a very wide field along the axes of decentralization and de-bureaucratization. In addition, while reform packages in the United Kingdom and the United States have generally involved central units, in Germany they have primarily involved local-government units, that is, municipalities (Franzke, 2008, p. 83; Lynn, 2006a, p. 123).

It is not easy to state with certainty to what degree the reforms carried out from the 1990s to the present have changed German public administration. Yet the proportional comparison of public-personnel employment at the federal, state, and municipal levels is useful at least for indicating the direction of the trend. On the basis of the figures presented in Derlien (2008, p. 180), one may generally say that both privatization and the adoption of part-time work, together with the gradual reduction of personnel hiring, produced a striking decline in staffing at the federal and state levels. At the same time, because powers were transferred to municipalities, and despite an overall downward trend, slight increases in municipal staffing also appeared. Similarly, the devolution of authority from the federal state to the constituent states resulted in increased employment in certain fields. In short, a clear pattern emerges of reduced personnel numbers, changes in the personnel regime, and a redistribution of authority from the center toward the local level.

To summarize the discussion, the German version of the New Public Management approach — the New Steering Model (*Neue Steuerungsmodell*) — aims, in line with the broader paradigm (Klages & Löffler, 1998), at the following (Pollitt & Bouckaert, 2017, p. 299):

- Result-oriented budgeting;
- Cost calculation of administrative products;

- Introduction of commercial book-keeping;
- Decentralized resource accountability;
- Definition of indicators for quality standards;
- Customer orientation;
- Outsourcing, contracting out, and privatization;
- Openness to ‘competition’.

The relationship between culture and reform may be evaluated from two angles. The first is the widely used classification of cultural families. According to this, Germany belongs, together with France, Belgium, and Austria, to the Continental European cultural family. Yet the reform comparisons built on this clustering do not fully capture Germany’s reform history. When Derlien’s (2008) data on German public-personnel numbers and certain privatizations are considered together with the comparative work of Hammerschmid et al., (2007), which matches cultural families with reform headings, it becomes clear that Germany diverges from Continental Europe at certain points and moves closer to the Scandinavian cultural family.

The second cultural evaluation is Hofstede’s dimensional classification, which is also used throughout this study for cross-country comparison and which analyzes each country through six distinct dimensions. In this light, when the Hofstede profile discussed above is compared with the findings of Derlien (2008, p. 180) and Hammerschmid et al. (2007, p. 153), the resulting picture becomes considerably more meaningful and intelligible. Germany and the United Kingdom score identically on power distance and very closely on masculinity–femininity, while differing slightly on uncertainty avoidance and individualism–collectivism and clearly on long-term–short-term orientation and indulgence/restraint. In short, Germany is not diametrically opposed to Anglo-Saxon culture. Comparisons based on different data sets (Schröter, 2007, p. 305) also provide evidence that confirms this interpretation.

3.2. Public Reform in France

France belongs to the Continental European cultural family. Although it shares many administrative and cultural elements with its geographical neighbor Germany, as will be discussed in the following sections it also displays important differences. France’s administrative, social, economic, political, and cultural structure has been shaped, as in many countries, within a historical process. Accordingly, the subject is approached here first by examining the roots of present-day France, and then by tracing the French phenomenon and values that rise on those roots.

In the geographical area that today includes parts of Germany, France, and their neighboring territories, Germanic communities once lived in the form of tribes. These Germanic tribes, which for a period formed a political union, were later divided by waves coming from the East and lived on under different political rules (Giddens, 2008, p. 160). Although they shared common ancestors, the fact that Germany and France developed into separate states stems from this division.

The emergence of a French culture distinct from Germanic culture and close to its present meaning occurred when the communities living in that area came under the rule of the Roman Empire. Over a span of roughly five centuries, Roman rule produced change not only in administrative and political terms but also in the socio-cultural sphere. The adoption of Christianity in particular represents the most important cultural transformation of that period. The Gallo¹⁴-Roman society that emerged from centuries of interaction moved, with the end of the Empire's rule over the region, into a distinct political organization under the name of the Frankish Kingdom, and in this way the political and administrative foundations of France in its present sense were laid (State, 2011, pp. 33–35).

Of course, the emergence of a centralized and bureaucratic France did not take place over a short period. The dissolution of the fragile and loose political unity that began with the Frankish Kingdom lasted until the sixteenth century. This period witnessed many important developments within Europe, above all the struggles for political and religious supremacy (Gall & Gleason, 2007a, pp. 22–23). Among the reasons why France, in sharp contrast to Germany, developed a rigidly hierarchical structure, one may count not only the Roman heritage but also attachment to the Catholic Church.

Alongside these factors, another development of vital importance was English rule over parts of French territory. The French, who for various reasons were subject to the English for a certain time, added the experience of the English monarchy to the political and administrative experience they had already drawn from the Roman Empire and the Catholic Church (State, 2011, pp. 33–35). Put more clearly, the French synthesized Germanic culture with the empire of the Romans, the church of the Catholics, and the monarchy of the English, thereby constructing a nation distinct from the Germans.

France's political and administrative centralization reached its peak in the sixteenth and seventeenth centuries. Indeed, beneath the monarch, a governing class performing administrative services emerged. The administrative units that

14 The name given to the ancestors of the French.

arose through the delegation of authority and specialization diversified further and gained strength especially under King Louis XIV (Dreyfus, 2014, pp. 34–35; Poggi, 2014, pp. 94–95). After a brief interruption in the monarchy, the synthesis and institutionalization of all the political and cultural experience accumulated until then became possible with the accession of the Bourbon family to the throne. The politically strengthened monarchy acquired a more centralized form and thereby consolidated its sovereignty (Eroğul, 2008, p. 147).

Within this historical trajectory, it should be noted that the Roman, Church, and English experiences that act as constitutive elements of France’s political, administrative, and cultural texture carry, as will be readily understood, an “external” character. Aside from these external determinants, the Revolution of 1789 constitutes one of the four main pillars that shape France. It is not easy to summarize the events and phenomena that made the Revolution possible; in broad terms, however, it may be described as a class-based struggle for supremacy between the middle class (bourgeoisie), which had become a great economic power, and the aristocrats, who held political rule despite making no significant contribution to the country’s economic development (Stovall, 2015, pp. 16–18).

The French Revolution of 1789 is often described not merely as a revolt against monarchy but as the moment in which a new understanding of sovereignty, rights, and citizenship entered history. Nevertheless, it should be remembered that this revolutionary process was also shaped by class conflict and by the struggle of a rising bourgeoisie against an aristocratic order that no longer contributed meaningfully to the country’s economic development.

In broad terms, the Revolution may be read as a class-based struggle for domination between an economically powerful middle class—the bourgeoisie—and an aristocracy that still held political control without making a comparable contribution to the country’s economic development (Stovall, 2015, pp. 16–18).

In order to understand what effect the Revolution had on France’s political, administrative, and cultural texture, one must focus on its outputs. In this respect, the Declaration of the Rights of Man and of the Citizen constitutes the clearest and most important product of the French Revolution of 1789. Beginning from the proposition that all human beings are born free and equal, and continuing with claims that private property is a natural right and that citizens must also have a say in lawmaking, the Declaration, even if it was not wholly libertarian or democratic in every sense, played a vital role in the bourgeois challenge to the existing aristocratic order, in the establishment of

democratic values, and in the destruction of absolutism (Hobsbawm, 2003, p. 69).

It would be wrong to say that the ideas forming the backbone of the French Revolution emerged only with the Revolution itself. A group of thinkers often referred to as the “constitutional bloc”, especially Locke and Montesquieu, had already advanced the argument that in order to secure individual freedom, the sovereignty of the state—legislative, executive, and judicial—had to be limited and divided (Kapani, 2018, pp. 29–30; Kaynar, 2017, p. 288). In this way, a broad public climate was created and the need for a normative founding document based on social compromise was defended (Çetin, 2017, pp. 74–75). In short, constitutionalism, which predated the French Revolution, found the opportunity to be realized through the Declaration of the Rights of Man and of the Citizen.

In Hofstede’s terms, France’s “mental software”, that is, its culture, began with the experience of its Germanic ancestors under the Roman Empire and took much of its final form with the Revolution of 1789. Certainly some changes took place in line with historical circumstances. Yet it would be wrong to describe these as ruptures capable of producing ontological transformations. Since 1789, which marks the starting point of present-day France, the major transformations that have occurred—setting aside the interruptions caused by short-lived constitutional monarchies—have consisted largely of changes in the balance of power between the legislature and the executive.

A change in the system of government, meaning a reorganization of the powers, responsibilities, and limits of the executive, naturally brings with it a new constitution in a country such as France, which has a written constitutional order. Since the French Revolution, five constitutional changes have occurred. Each of them represented a new republic. Put more clearly, France, where the fifth constitution has been in force since 1958, has lived in the period of the Fifth Republic ever since (Parlak & Caner, 2013, pp. 28–29). Although the Third and Fifth Republics were relatively long-lived and stable, the others were quite short-lived (Roskin, 2013, p. 79). In short, French political life followed a highly turbulent course until 1958.

When one examines present-day France, that is, the Fifth Republic, and its administrative and political system, it becomes necessary, unlike in some other countries, to focus first on the executive and to carry out the analysis around that axis. Among the principal factors that triggered changes in the system of government were the Second World War (Cowans, 1991, p. 68) and the independence movements that arose in the colonies (T. Smith, 1974,

p. 218). Whatever the immediate causes, the French executive took much of its present form in and after the 1958 referendum (Gaffney, 2003, p. 689).

Upon the painful experiences of the German occupation and the Vichy regime that followed, and in order to remedy the deficiencies of the Third Republic and ward off the socialist threat, the Fourth Republic was proclaimed under a constitution shaped in part by American influence (Stovall, 2015, pp. 369–372). Yet for a France facing colonial crises at a time when decolonization was spreading across the world, urgent action was more vital than a slow compromise. Once these delicate circumstances were combined with France's noisy and fragmented political life, it became *de facto* impossible for the executive to perform its duties effectively. The main reason for this was seen as the insufficient empowerment of the head of the executive and the ease with which parliament could dismiss governments (Roskin, 2011, p. 123).

At this point, the key figure is Charles de Gaulle. After the expulsion of the Nazis and the Vichy regime from France, de Gaulle, accepted as the leader of the struggle, was authorized to form the government and draft a new constitution. Although he had already insisted, under the Fourth Republic, on strengthening the executive, this ambition could be realized only in part through the Constitution of the Fifth Republic and the constitutional amendment of 1962 (Elgie, 1999a, p. 67; Pasquino, 2007, p. 17). Whereas in classical parliamentary systems the president occupies a symbolic and representative role, the 1962 change greatly increased the president's powers and responsibilities in the sphere of the executive, especially with regard to national and international policies (Andrews & Michael, 2006, p. 446).

In addition to the powers guaranteed on the constitutional plane, both the fact that the president comes to office through election and the *de facto* authority stemming from the conventions established in the de Gaulle period mean that any conflict between the president and the prime minister tends to be resolved in favor of the president (Gaffney, 2003, pp. 691–692). Moreover, where there is no disagreement between the president and prime minister, or when they come from the same political current, the prime minister's *de facto* role is largely to serve as the spokesperson of the president before the cabinet and the legislature (Roskin, 2013, p. 86).

This governing practice inserted into parliamentarism later came to be called semi-presidentialism (Elgie, 1999b, p. 1). Because parliamentarism and presidentialism emerged over centuries of political experience, they acquired characteristic features and formed coherent models. The French model, however, as a hybrid structure lacking that same coherence, has produced highly varied applications across countries (Elgie, 2007, p. 2). Even though

it displays variety (Elgie & Schletter, 2011, p. 44; Wu, 2011, p. 21), the distinctive feature of semi-presidentialism is usually taken to be the coexistence of an elected head of state with significant executive functions and a council of ministers formed from members of the legislature (Elgie, 2011, p. 1).

Once the nature of the executive has been addressed, a broader view of French administration—deeply attached to its traditions—suggests that it is structured around two main layers. The first layer, shaped by the Old Regime before 1789, the revolutionary regime, and finally the imperial regime, is marked by centralization, bureaucracy, unitarism, rationality, and hierarchy. The second layer arose from the adaptation of the first to the conditions of the time, such as the process of European integration (Şengül, 2007, pp. 563–564).

In this second layer, which attained a constitutional basis in the early 2000s, the distinguishing feature was the change carried out in the sphere of centralization. According to this new arrangement, rigid centralism softened markedly through the principles of delegation and deconcentration, both of which still fit within a unitary-state understanding. With this change, the planning and implementation of public policies came to be shared between central and local government (Karahanoğulları, 2013, p. 78). Put differently, many of the powers, duties, and responsibilities exercised by the territorial branches of ministries—similar to those found in Türkiye (Eryılmaz, 2018, p. 165)—were transferred to local authorities.

The ministers, who carry out national, that is, central, services, constitute the other wing of the executive after the president. As a result of semi-presidentialism, however, the position of the council of ministers within the executive is not autonomous. In addition to the president's independent executive powers, he is also the head of the council of ministers. Meetings held without the participation of the president have no major political weight or binding effect. In the meetings called cabinet meetings, where discussions are held on the implementation of decisions taken in the council of ministers, no new and binding decisions are adopted (Eroğul, 2008, pp. 181–182). In this sense, the prime minister's role within government does not extend much beyond coordinating between ministers and the president (Roskin, 2013, p. 86).

The structure of ministries is not fixed by rigid and immutable rules. There is no ministry whose existence is constitutionally mandatory, nor is there a numerical limit on ministries. The prime minister can organize ministries in line with his own priorities and those of his party program. Indeed, it is clear that ministries are frequently reorganized according to the political orientation

of the prime ministers who take office. At first glance, such rapid change might seem likely to disrupt public services. Yet the formation of ministries does not mean the creation of wholly new institutions; rather, it means only that the superior authorities to which those institutions are attached are changed (Roskin, 2011, pp. 130–131).

The president is not linked only to the council of ministers in the conduct of state affairs. The Council of State (*Conseil d'État*) and the Constitutional Council (*Conseil constitutionnel*) are also among the major higher structures with which the president interacts directly. The Council of State, attached to the president, is a subordinate body composed solely of civilians and endowed, in extraordinary circumstances, with duties and powers similar to those of Türkiye's National Security Council, such as advising the government and parliament (Parlak & Caner, 2013, p. 35). The Constitutional Council, unlike the American Supreme Court, performs a role closer to that of the Turkish Constitutional Court as the highest organ of constitutional review. Although it belongs formally to the judicial branch, it carries a strongly political character because it plays a critical role in disputes between the executive and legislature and between the president and the council of ministers (Roskin, 2013, p. 92).

Contrary to what is often assumed, the relationship between the French president and the judiciary goes well beyond the surface or the purely symbolic. This can be seen clearly in relation both to the Constitutional Council and to the High Council of the Judiciary. Of the nine members of the Constitutional Council, three are appointed directly by the president, who also chooses the president of the Council from among them. Moreover, because there is no requirement such as being a judge or lawyer, former presidents can also sit on the Council as *ex officio* members. Likewise, all the members of the High Council of the Judiciary—an organ that has a say in many judicial matters, from the appointment of Court of Cassation members to the appointment and discipline of judges and prosecutors—are appointed by the president (Eroğul, 2008, pp. 186, 192).

A general view of the judiciary also shows that, unlike the Anglo-Saxon legal system, France has a dual system (*dualité de juridictions*) composed of a judicial (ordinary) jurisdiction and an administrative jurisdiction. This distinction emerged after the Revolution of 1789 and the construction of the constitutional order, when the principle of separation of powers was adopted. Since the administration, as part of the executive, was held not to be subject to the ordinary judiciary, but the executive also needed to be limited and reviewed, a separate mechanism arose. Although review carried out under certain rules may itself be seen as a form of adjudication, the founders treated

the judging of the administration as part of administrative action. Yet, by adopting the principle that administrative adjudication should be performed by more than one person, they laid the foundations of administrative justice through the creation first of provincial councils and then of the Council of State (*Conseil d'État*) (Karahanoğulları, 2013, pp. 66–67).

As in many other countries, legislative power in France is exercised through two chambers, the National Assembly and the Senate. Similar to the House of Commons in the United Kingdom and the House of Representatives in the United States, the National Assembly is regarded as representing the French people, and population therefore serves as the principle for determining its membership. Members are elected every five years together with substitutes, since members who become ministers lose their parliamentary seat. The Senate, by contrast, is determined not on the basis of population but on the basis of territorial administration, that is, local governments, and aims to secure equal representation of local units within the central state. As ministers can also be chosen from among senators, senators too are elected for six years together with substitutes. Senate elections, however, do not occur directly. Senators are chosen by regional councils, departmental councils, and municipal councils that themselves are elected directly by the public (Tunç, 2018, pp. 192–194).

Legislative activity in parliament takes place chiefly in the National Assembly. Yet whereas the assemblies of the Third and Fourth Republics played an active role in both legislation and government in line with parliamentarism, it would be misleading to say that the National Assembly of the Fifth Republic stands as a strong counterweight to the executive. As a result of the restrictions that de Gaulle introduced in the legislature in order to secure governmental stability, the Assembly now deals mainly with bills sent by the government. The Senate, which is the upper chamber, is similarly limited in its powers. Even so, it should be noted that in the Senate, where the agricultural population is represented strongly, laws contrary to the interests of farmers encounter serious opposition (Roskin, 2011, pp. 131–135).

The transfer of the powers of central-government territorial branches to local authorities makes it necessary to treat local government, alongside the judicial, legislative, and executive branches, as a power factor in its own right. In France, local government is organized on three levels according to need: Regions, departments, and municipalities (Andrews & Michael, 2006, p. 446). Regions are composed of departments that are geographically close to one another and share common needs. They are governed by a Regional Council elected directly by the public and by a Council President chosen by

the council itself. Similar processes apply in the departments (Parlak & Caner, 2013, pp. 43–45).

Municipalities, however, form the most important pillar of local government, both numerically and in terms of the powers they possess. Since no minimum threshold has been established, it is known that more than thirty-six thousand municipalities operate across France. The determining organ of the municipality, as in the regions and departments, is the municipal council. The mayor is again chosen from within the council. In addition to being a local executive, the mayor also acts as the local agent of the central state and as the representative of judicial police authority (Tuñç, 2018, p. 201).

Within the framework of the principle of subsidiarity, municipalities in France not only have powers and responsibilities similar to those of municipalities in Türkiye but also perform many functions normally carried out by the territorial branches of the central state. Death, birth, and marriage registration, the preparation of voter lists, military procedures, local policing, social assistance, infrastructure services, social housing construction, the designation of industrial zones, and many services in the fields of education and culture fall within municipal responsibility (Şengül, 2012, pp. 36–37). To summarize, the Fifth French Republic rests on an administrative structure marked by a strong executive and broad local-government powers. It is also apparent that, thanks to the powers held by the president, the executive occupies an advantageous position not only vis-à-vis the legislature but also vis-à-vis the higher judiciary.

Although the French Republic appears to be governed mainly by the president at the center and by municipalities at the local level, it is well known that the bureaucratic structure is at least as influential in government as these elected authorities. French public personnel, who provide one of the clearest examples of the power resources traditionally associated with bureaucracy in Weberian public administration (Eryılmaz, 2013, pp. 111–119), account for roughly twenty-six percent of nationwide employment. Public employees working in central administration, local administration, health services, and other sectors are classified into three categories in terms of recruitment, career path, and employment rights: A (senior managers and decision makers), B (middle managers), and C (implementers and frontline service providers), with entry qualifications corresponding respectively to a bachelor's degree or above, high-school level, and no diploma requirement (Karahanoğulları, 2013, pp. 106–107).

While personnel in categories B and C resemble their counterparts in Türkiye, category A officials are subject to certain special conditions.

Formally, an undergraduate degree is sufficient for managerial office, but for prestigious positions it is necessary to receive training in special “schools of administration”. The most important of these is ENA (*École Nationale d'Administration*)¹⁵, attached to the Prime Minister’s Office. Graduates of this school, known as *énarques*, are appointed to the state’s most important positions according to their rank in the school and may carry their careers as far as the prime ministership and presidency (Tunç, 2018, pp. 204–205).

ENA, founded on the belief that public officials working closely with elected leaders should receive a special education enabling them to analyze problems in an analytical framework and propose correct solutions, has been subject to serious criticism for drifting away from its founding purpose. More explicitly, it is argued that ENA graduates—who were expected to help elected leaders by correctly formulating the needs of the public—have instead formed an elite culture and transformed the decisions of elected officials in line with their own purposes. It is also known that members of this elitist bureaucratic group often politicize themselves and enter active politics through various routes (Hanley, 2003, pp. 27–28; Şengül, 2015).

After addressing the concrete structure of France, it is useful to concentrate on culture, the abstract texture that underlies it. Earlier it was noted that French culture, with its Germanic roots, was shaped under the Roman Empire, the Catholic Church, and the temporary English presence. Although this synthesis helps reveal the larger picture by setting out the cultural foundation, it can remain insufficient for identifying details and period-specific changes. For this reason, it is particularly important to ask what local and global events of the last century have added to French culture.

France entered the twentieth century as a multicultural and multinational country in which religious and ethnic differences were largely ignored, owing both to the social and political climate created by the Revolution of 1789 and to the colonial process. Thanks to France’s dominance in Africa and Europe, French long persisted across the world as both a language of law and a language of diplomacy. Yet in the process of transformation that began after the First World War and accelerated with the Second, France proved unable to preserve either its multicultural and multinational structure or the dominance of its language. As nationalism intensified, France lost its cultural diversity and became increasingly more French. Once this was followed by the spread

15 Since ENA was replaced in 2022 by the Institut national du service public (INSP, 2021), the discussion here treats ENA primarily as the historical institution through which the French senior civil-service elite was formed. Its significance for this study lies less in its current institutional status than in the administrative culture and elite reproduction pattern it historically embodied.

of American popular culture and consumer culture, France began to move steadily away from the values of the Revolution (Hewitt, 2003, pp. 4–5).

The principal determinants of this process—which amounted to a shift from a dominant culture that once shaped the world to a more passive one—were globalization and industrialization. As transportation and communication accelerated with technological development and their costs fell, political, economic, and social interaction expanded. When this was combined with the fact that the United States, having become the world leader over a Europe reduced to ruins by two world wars, undertook the reconstruction of Europe in its own way, through the importation of industry, a scenario very different from that of the Revolution of 1789 emerged within French economic and social life, which had depended heavily on agricultural production (Bousquet & Pessin, 2003, pp. 41–42).

Yet it would be wrong to say that the American cultural “invasion” that intensified in the 1950s occupied French culture without encountering resistance. It is clear that serious public policies were implemented in defense of French culture and literature, beginning with the ‘Free France’ movement under Charles de Gaulle (Cowans, 1991, p. 66) and continuing into the first years of the Fifth Republic. Even so, these efforts remained limited to a relatively narrow period, at least until the revival of Gaullist political formations after the 1990s. From that point onward, despite rises and falls, a process began in which France was, in a sense, re-Frenchified (Kelly, 2003, pp. 181–185).

From the Revolution of 1789 to the present, France has repeatedly experienced oscillations in social, political, economic, and cultural life. Broadly speaking, when one refers to traditional French political culture, what comes to mind is high centralization, weak localization, and political instability caused by a fragmented party system and weak political leadership. Traditional administrative culture, by contrast, while similar in its centralizing tendency, has displayed a much more stable and powerful character than political culture. This is naturally because administration became institutionalized long before democratic political organization did (Owen, 2000, p. 50).

It is also well known that Giddens argued that bureaucratic centralization played a constitutive role in the emergence of the nation-state model that dominates the contemporary world. According to Giddens, France set itself on the path to nationhood through the stable administrative structure it established first in the Île-de-France¹⁶ region, even before achieving cultural and linguistic

16 Today this region, which contains Paris, is the most populous in France. It may also be called the heart of France.

unity. Long-term rule from a fixed center enabled administrative traditions and conventions to form within the state, and this in turn generated the idea that the other spheres of social life should also be harmonized (Giddens, 2008, p. 162). In short, there was a French bureaucracy before there was a French democracy.

It is possible to trace in French history the marks of many political shifts, from a period under Roman and English rule, to oscillations between monarchy and constitutionalism, and finally to the republics that were repeatedly redesigned. Yet despite all this movement, the administrative structure, that is bureaucracy, continued to exist steadily from the sixteenth century onward. As indicated in earlier paragraphs, this can be seen clearly in the ministerial structures that were reorganized around the prime minister.

If one sets all this political movement aside, national defense, economic protection and promotion, and the provision of public service and social security may be said to constitute the three basic characteristics of the French state. Put differently, all other factors can be treated as secondary beside these. For this reason, France, which exhibits different cultural traits from period to period, may at the same time be described as both a strong and a weak state (Hayward, 2003, pp. 35–38). Yet as has already been noted, these three basic characteristics do not in themselves require a particular political regime, while they do make a bureaucratic structure indispensable.

Roskin (2011, p. 171) conceptualizes this situation as an *immortal bureaucracy*. In his view, the many changes in the political system over the centuries have increased both the size and the strength of the bureaucracy. Once bureaucracy attained a certain degree of autonomy, it became able to continue managing the apparatus of the state without disruption, largely unaffected by changes of government, even when those governments came from different ideological backgrounds. In addition to the fact that senior public officials are educated in specific schools through an elitist approach, they are endowed with broad powers that strengthen their hand not only against the executive but also against the legislature. Moreover, inspections carried out within the framework of tutelage have not eliminated the intervention of the central bureaucracy, despite the spread of decentralization. It may even be said that each step taken to reduce bureaucratic power has ended up strengthening it further (Roskin, 2011, pp. 171–173).

If one looks at French social culture, one sees a situation more stable than the turbulence of politics. The French have many characteristic features, but the most prominent is individualism. Yet this individualism is not constructed in the same way as American individualism through individual-to-individual

relations. French individualism has a more complex structure shaped through the individual-state relation, the individual-society relation, and the distinction between public and private (Brault, 1962, pp. 43–46). Métraux (2001) analyzes French individualism around the concept of *le foyer*, meaning home, family, and intimate private life. According to him, a French person develops formal relations with those outside this sphere and dislikes speaking about the *le foyer* itself (Métraux, 2001, pp. 3–4).

The workplace reflection of this private-life-centered observation was conceptualized by the French sociologist Crozier (1964) as a “horror of face-to-face relationships” (*horreur du face-à-face*). In professional life, according to this view, the French avoid one-to-one verbal communication in both individual and intergroup relations—or, more clearly, in relations of authority—and construct an insulated formal system of relations (Crozier, 1964, p. 214). This horror of face-to-face relationships, which takes concrete form in impersonal and aristocratic behavior (Bezes, 2016, p. 251), can be read within the traditional Weberian model of administration as the transformation of features such as impersonality, authority hierarchy, legally grounded authority, administration through documents, the system of rules, and most fundamentally the separation of public and private life into durable characteristics shared by French public personnel at all levels, from the lowest to the highest (Eryılmaz, 2013, pp. 60–63).

Roskin (2013, p. 99) describes this characteristic of the French as follows:

Outside of family, French people feel uncomfortable with face-to-face relationships. Some tourists find the French unfriendly, but they are reserved and formal to everyone. The French style is opposite that of the American, which values informality and friendliness. To avoid face-to-face relationships, the French prefer structure and formality with clear but limited impersonal rules that keep out of one’s private domain.

Taken together, these cultural features suggest that the French display two different behavioral patterns framed around freedom and authority depending on social status and/or the social role they hold. Put more concretely, a French person may exhibit a libertarian attitude in private life while displaying an authoritarian attitude in the provision of public service. What matters is whether the person is someone who wants to sip coffee in the park or the person responsible for security in that park. This is not meant to imply a rigid class division. A person’s behavior can change immediately according to the role being performed. This fragmented personality may be summarized as

“an anarchist secretly admiring the police, and a policeman secretly admiring the anarchist” (Roskin, 2013, p. 99).

This difference also becomes very clear when one evaluates France through Hofstede’s cultural dimensions. French culture differs markedly both from Anglo-Saxon culture and from German culture. In this sense, the dimensions that most strongly shape the character of French culture are power distance, masculinity/femininity, and uncertainty avoidance (Hofstede et al., 2010, pp. 102–105). The observations above provide the concrete reflections of these dimensions.

This becomes even clearer when the dimensions are examined one by one. France does not differ sharply on the axes of individualism/collectivism, long-term-short-term orientation, or indulgence-restraint. Yet on the dimensions of power distance, masculinity-femininity, and uncertainty avoidance, it stands quite apart from the countries compared here. Beginning with power distance, the French have a higher score than the others (Hofstede et al., 2010, pp. 56–62, 92–97, 138–143, 190–194, 252–258, 280–285). This means that in administration, and indeed in many other fields, a more authoritarian attitude is displayed than in those comparison cases, and that decisions are taken by superiors without consulting subordinates. More than that, this arrangement is also accepted by subordinates themselves. The prevailing understanding is that everyone has a sphere of responsibility appropriate to their hierarchical position, that decisions should be made by managers, and that employees should simply perform what is asked of them in the manner expected.

On the masculinity-femininity dimension, France, with a score below both the general average and the averages of Germany, the United States, and the United Kingdom, appears less eager to take immediate decisions and initiative, to try new things, and to adapt to them (Hofstede et al., 2010, pp. 56–62, 92–97, 138–143, 190–194, 252–258, 280–285). As might be expected, France ranks very high on uncertainty avoidance. In a country that differs significantly from Germany and very sharply from the United States and the United Kingdom, public employees tend to carry out written, clear, concrete, and preplanned actions, while refraining from initiative and decision in sudden and unexpected situations. In short, unforeseen situations and surprises are not especially welcomed in France.

When one offers a holistic evaluation on the basis of Hofstede’s dimensions, the integration between France’s scores and the traditional Weberian bureaucratic model becomes strikingly visible. Setting aside the question of whether France shaped Weber or Weber shaped France, French public administration may be said to provide one of the finest examples of the Weberian bureaucratic

model. Once France has been discussed in a manner suitable to the aims of this study, one can turn to its interaction with the reforms implemented under New Public Management. While the United Kingdom and especially the United States began moving from an *administration* model to a *management* model before the 1980s, France is known to have remained cold toward business-like reforms and to have resisted them for some time. Throughout that period, it sought to contain the perceived need for reform within the bounds of administrative modernization and decentralization. Reforms in line with New Public Management became possible only when the elites of the Ministry of Finance, the strongest bureaucratic and political force in France, became acquainted with neoliberal policies (Pollitt & Bouckaert, 2017, p. 287).

At the same time, reforms compatible with New Public Management, though not yet directly framed by that doctrine, were also implemented at the beginning of the 1980s. The Oil Crisis, which affected the economies of all countries, also negatively affected the French public economy. Whereas petroleum dependence was the main cause of public budget deficits in many countries, in France the principal cause was the wages of a public sector that had reached enormous dimensions, together with the health, social-security, and pension expenditures associated with it. Especially between 1969 and 1981, the number of public employees increased by 150 percent, rising sharply from two million to five million. Although politicians recognized the burden that this rise in personnel numbers placed on the budget and eventually on the national economy, it would be wrong to say that society at large shared the same awareness. A study conducted in the 1970s showed that 75 percent of the population encouraged their children to become public employees (Rouban, 2008, pp. 222–224).

Of course, the fiscal burden produced by the rise in the number of public officials did not by itself create the need for reform. The French bureaucracy, which concentrated in itself nearly all the negative aspects of bureaucracy and combined them with an elitist structure, made it necessary to protect citizens against the administration. In this context, central administration, which became the first reform priority for politicians in the early 1980s, was brought under control through decentralization (Kickert, 2007, p. 31). The fact that France, unlike its other European neighbors, preferred localization undermined the conventional image of a “centralized France”. Put differently, by adopting decentralization, France sought both to break centralism and to shrink the state (Schedler & Proeller, 2002, p. 169).

The reason decentralization became the first item on the agenda in the early 1980s lay in ideological and political causes. More specifically, the Socialist Party

and the victory it achieved in local elections in the 1970s shaped the direction of the reforms of the 1980s. Traditionally inclined to develop policies against the central government, the Socialist Party abandoned that strategy and decided to concentrate on local government. It should be stated immediately that this shift toward local government did not mean a departure from socialism. Unable to overcome the resistance of the central elitist bureaucracy, the Party chose to reach its aims by transferring authority, responsibility, and resources from central government to local authorities (Keating, 1983, p. 241).

After the victories of the 1970s, the election of the Socialist Mitterrand as President of the Republic also supplied the legal basis required for transferring powers and resources to local governments. In a short time, many powers belonging to the Ministry of the Interior were devolved to local units (Schmidt, 1990, pp. 118, 120). Put differently, this policy, meaning the relocation of the state from the center to the local level, was formalized through the law of 2 March 1982, which largely removed the tutelary powers of prefects over departments and municipalities, and thus marked the first major step in dismantling traditional centralism (Lynn, 2006a, p. 125).

These decentralization reforms carried out under Mitterrand were at their liveliest between 1981 and 1984. Yet it should also be stated that even in this form they did not amount to fully autonomous local government in the contemporary sense (Wilsford, 2009, p. 386). To summarize French decentralization, whereas pioneer states of New Public Management such as the United Kingdom and the United States preferred privatization in order to escape the economic bottleneck caused by the Oil Crisis and Welfare State policies, France produced its own solution by seeking to weaken the influence of the central bureaucratic elite and to strengthen socialist municipalities.

The weakening of central tutelage and the increased authority and fiscal autonomy of local authorities do not mean that France moved away from a Napoleonic administrative and political culture, unlike Spain, which devolved political authority to regional governments. The reason is that, unlike Spain, France transferred powers to local units primarily in administrative and fiscal rather than political terms (Bezes & Parrado, 2013, p. 46).

Although Mitterrand also developed policies in line with New Public Management before 1986, the first fully fledged reforms of this kind began only when Chirac, a center-right politician and also an ENA graduate, became prime minister. Clearly inspired by Thatcher and Reagan, the reforms of this period were characterized by privatization, the transition of the state to a regulatory role in the market, liberalization in exchange-rate and monetary policy, and other deregulatory measures (Wilsford, 2009, p. 386).

After Chirac's relatively brief period as prime minister—and later as president—the reform process did not end; on the contrary, it continued in more visible form. In the Tenth Plan-1989, the role of the state was redefined and a move was targeted from a procedure-centered understanding toward one responsible for results. These reform policies, described in specifically French terms as the renewal of public services, the modernization of the state, or state reform (Bezes, 2001, p. 100), rested fundamentally on two pillars: the provision of quality-centered public service and the auditing of that service, and the spread of project-based public service. To achieve these aims, principles of human-resource management were adopted, various training programs were organized, and steps were taken to improve relations with the public (Lynn, 2006a, p. 125).

The examples given above should not be taken to mean that reform policies were abstract or superficial initiatives. In the decade from 1991 to 2001 following the Tenth Plan, many commissions were established in order to secure and strengthen effectiveness, efficiency, and accountability in public service. The reports and reform packages produced by these commissions, which aimed to reinterpret public services and their delivery from a strategic perspective, were taken seriously by politicians and public managers and efforts were made to implement them (Bezes, 2007, p. e70).

There is a mistaken view that France is incompatible with New Public Management and that such reforms either cannot be implemented there or, if implemented, cannot produce successful results. One reason for this misunderstanding is that France has reinterpreted New Public Management reforms through its own political and administrative culture while also implementing reforms specific to itself. Another reason is the tendency to reach general conclusions by looking at Napoleonic countries such as Spain, Greece, and Portugal, whose political and economic instabilities are not simply the outcome of their administrative culture but of major internal problems (Ongaro, 2010, pp. 187, 189).

Alongside these two reasons, another cause of misunderstanding is that reform in France has been spread over time. Whereas countries such as the United Kingdom, New Zealand, and the United States implemented rapid and coherent reform packages, France moved comparatively more cautiously. Reforms that clearly reflected New Public Management and were implemented in the Anglo-Saxon countries by the beginning of the 1990s became possible in France only in the early 2000s. During this period, drawing on public-policy and budgeting guides from countries such as Canada and the United Kingdom, efforts were made to redefine the function of the state around

performance and performance auditing. Unlike the Mitterrand reforms, those of this period covered not only the local level but also central government and regional administrations (Bezes et al., 2013, p. 158).

When one focuses on the reforms of the 2000s in this context, one sees that a series of legal measures were enacted in the fields of budgeting and financial management. Innovations such as strategic long-term planning, citizen-centeredness in public service, the adoption of total quality management techniques, a better definition of coordination among units in service delivery, and a shift in budgeting from a resource-based approach to a performance-based one were accepted within the framework of these legal arrangements. In addition to these structural changes, steps were also taken to strengthen managers, for example by allowing them to transfer resources from one spending category to another within the budget (Ongaro, 2009, pp. 202–203; Sadran, 2003, p. 59).

Compared with the United Kingdom and the United States, the French reform process differs in both timing and content. For example, whereas privatization ranked first elsewhere, France gave priority to decentralization because the Socialist Party held greater strength in local government. The relative delay of the other reforms may be explained by the French character, which expects decisions to come from above (power distance), remains cautious (masculinity/femininity), and acts through legal regulation (uncertainty avoidance).

Thus, the French case does not disprove the cultural argument of this study; it makes that argument more precise. France did not reject New Public Management altogether, nor did it adopt it in the Anglo-Saxon manner. It translated reform into a language compatible with its own administrative history: decentralization before full marketization, legal reform before managerial autonomy, and state modernization before a direct celebration of the market. In this sense, France shows that reform can move in the same broad direction while preserving a distinct administrative grammar.

Conclusion

This study has treated New Public Management not as a narrow technical response to the economic crises of the 1970s, but as part of a broader paradigm shift concerning the role of the state, the nature of bureaucracy, the delivery of public service, and the social ground on which reform rests. The first major conclusion to emerge from this perspective is that New Public Management is neither simply the sum of a number of market-friendly administrative tools nor a universal prescription that can be applied in the same way everywhere, independent of culture, history, and institutional tradition. It is better understood as a reform logic that carries certain common principles and objectives, yet takes concrete form only through its encounter with different administrative structures, political experiences, and social expectations. To understand the character of reform, one must therefore ask not only what was changed, but also on what cultural and institutional ground the change took place.

As the first chapter has shown in detail, the emergence of New Public Management was the product of a long sequence of crises, debates, and breaks extending from the Great Depression of 1929 to the Oil Crisis, from welfare-state practices to Public Choice theory. The principal criticisms directed at traditional Weberian public administration centered on bureaucratic inertia, excessive centralization, rigid proceduralism, inefficiency, the weakness of accountability, and the ineffective use of public resources. In response, New Public Management sought to make public administration more functional, more controllable, and less costly through instruments such as performance, results orientation, decentralization, flexibility, competition, strategic management, accrual accounting, and e-governance. Yet, as the study has shown, the meaning and implementation of these principles depend directly on the administrative cultures of the countries that adopt them.

The chapter on Anglo-Saxon culture clarified why New Public Management reforms appeared earlier, more visibly, and more systematically in the United Kingdom and the United States. In the United Kingdom, a deeply rooted but flexible constitutional order, the room for maneuver provided by parliamentary tradition, a pragmatic political culture, and the leadership style of the Thatcher years came together to make it possible to pursue privatization, agency creation, performance emphasis, and the reorganization of the central state in a forceful way. In the United States, by contrast, individualism, entrepreneurship, federalism, strong local government, and a public culture already close to private-sector logic made reform easier to absorb, even if it unfolded in a less centralized and less uniform manner than in Britain. At the same time, the American case also showed that reforms misaligned with institutional and cultural structure could face serious resistance even when strongly backed by political leadership.

The Continental European cases show that New Public Management was not a transformation belonging only to the Anglo-Saxon world. Rather, it appeared in different administrative traditions in more selective, more limited, and more hybrid forms. In Germany, the strong tradition of the *Rechtsstaat*, federalism, disciplined bureaucratic culture, and long-term thinking pushed reform toward decentralization, de-bureaucratization, changes in personnel regimes, results-oriented budgeting, and local managerial reform rather than toward a radical dismantling of the state. Indeed, the study suggests that although Germany belongs culturally to Continental Europe, its reform practice places it in an intermediate position rather than in total opposition to the Anglo-Saxon world. In France, despite a historically centralized and elitist state structure, the burdens created by public employment, fiscal pressures, and administrative heaviness generated a visible need for reform. Decentralization, the limitation of central administration, and a partial retrenchment of the state in certain areas all point to the fact that even a Napoleonic administrative tradition can be pushed toward reform under particular conditions.

The broadest conclusion that follows is therefore this: the success of public administration reform cannot be explained solely by economic necessity or solely by political will. Reform succeeds when there is a degree of fit among administrative culture, the historical state tradition, the structure of political institutions, social expectations, styles of leadership, and the character of the reform instruments themselves. The same principle produces different results in different countries. Decentralization, performance management, privatization, or strategic management do not carry the same political or social meaning everywhere. For that reason, it is misleading to read public administration reform as a single line of universal progress. A more accurate

approach is to understand reform as a multilayered field of transformation that contains certain general tendencies but is continually reshaped within local administrative and cultural contexts.

In the end, when New Public Management reforms in Anglo-Saxon and Continental European cultures are compared, the decisive difference does not lie in whether reform occurred, but in the scope, speed, direction, and sources of legitimacy of reform. In the Anglo-Saxon world, reforms were earlier, more visible, and more openly shaped by market logic. In Continental Europe, the same transformation was generally implemented in a more cautious, more selective manner and in closer accommodation with existing state traditions. This shows that culture is not an insurmountable obstacle standing before reform. It is a constitutive variable that shapes reform's form, rhythm, and depth. For this reason, the question is not whether a country is culturally "ready" or "unready" for reform, but how reform is reworked once it enters a particular administrative tradition. The key question in debates on public administration reform is therefore not which model is more correct in the abstract, but which reform instrument is more compatible with the administrative and social reality of a particular country. Durable and effective reform in public administration becomes possible only when that compatibility is recognized.

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