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ORIGINAL ARTICLE

A matter of information, discussion and consequences? Exploring the accountability practices of interest groups in the EU

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Abstract

Interest groups are perceived as vehicles that can enhance the legitimacy of public institutions at the national and supranational level. However, the potential of these organizations to enhance democratic representation is often questioned and has rarely been systematically analysed. In this article, we examine the under-researched area of interest group accountability, a key component for groups to realize their democratic potential. To do this, we take an organization-centric and top-down perspective and develop a tailored analytical framework including three key dimensions—*information, discussion and consequences*. Drawing on data from a large-scale survey of interest groups active at the EU level, we find considerable variation in the extent to which groups demonstrate practices related to these three accountability dimensions. Furthermore, while receiving funding from EU institutions does not have any significant effect on interest group accountability, we find that organizations representing businesses interests more frequently develop accountability practices related to the dimensions of discussion and consequences, whereas citizen groups are more focused on the information dimension.

Keywords Interest groups · Accountability · Representation · Membership · European Union

Introduction

Interest groups have been valorized for enhancing representative democracy by giving voice to, and aggregating, a wide range of societal interests (Manin 2002; Mansbridge 2003; Lowery and Gray 2004; Saward 2014). While much work has focused on the link between the preferences of groups and public policy outcomes, there has been a paucity of research on the question of accountability.

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The accountability research gap is surprising given that it is an essential component of interest groups' representative and legitimacy claim-making. Accountability is defined as a '… relationship between an actor and a forum, in which the actor has an obligation to explain and to justify his or her conduct, the forum can pose questions and pass judgement, and the actor may face consequences' (Bovens 2007, p. 450). Accountability in the context of interest groups is based on a representative model and specifies to what extent group leadership takes into account membership preferences (i.e. to what extent it explains and justifies its actions) and to what extent membership can hold its leadership accountable for (not) doing so (i.e. the opportunity to ask questions and pass judgement).

Inevitably, there is variation in the mechanisms groups have in place to ensure accountability towards members, and the intensity with which they implement these instruments. Accountability mechanisms through which members can hold leaders to account are absent or very limited in some groups, while in others leaders are subject to significant membership control (Greenwood 2007; Fraussen and Halpin 2018; Warleigh 2001).

The accountability issue is related to the broader tension faced by intermediary organizations that have to balance involving members in organizational governance (and being attentive to their demands) with being effective policymaking partners that can influence policy outcomes. This is the classic *trade-off* between the 'logic of membership' and 'logic of influence' (Schmitter and Streeck 1999; Berkhout 2013), exemplified by the transmission belt function that assumes an organizational structure that ensures organizational responsiveness between membership interests and policy input (Albareda 2018).

In contrast to transmission belt practice, many studies have shown a trend among groups towards professionalization characterized by elite-level (staff and leadership) dominated decision-making and less membership participation and involvement (Albareda 2020; Jordan and Maloney 1998; Halpin 2006, 2010; Klüver and Saurugger 2013; Maloney 2015). As noted by van Deth and Maloney (2012, p. 2): 'From the beginnings of the 1980s we see a gradual organizational change. Organizations become more professionalized, specialized and centralized (Tranvik and Selle 2005). Many voluntary organizations changed their view on membership and gave less priority to organizational democracy'. Klüver and Saurugger (2013) identified the same trend in a wide variety of groups active at the EU level. Recent work by Kröger (2018, p. 12) on the representativeness of EU umbrella associations also found that while they may strengthen output legitimacy by providing policy expertise, '… these umbrellas are not the legitimacy providers at the EU level that some have imagined them to be'. Based on a study of environmental, anti-poverty and agricultural groups in Germany and the UK, Kröger (2018) found that the level and quality of interactions between these groups and their EU umbrellas varied considerably, as did their satisfaction with how EU peak associations represent their interests. In sum, while accountability is central to the representative claim-making of groups (as well as their credibility, legitimacy and trustworthiness, see also Brown and Jagadananda 2007; Keating and Thrandardottir 2017), the evidence remains inconclusive regarding the extent to which accountability is practiced.

To obtain greater insights into the accountability relationship between groups and their members and critically assess the contribution of these intermediary organizations to representative democracy, this article conceptualizes the accountability of groups through a three-dimensional analytical framework. We take an organization-centric and top-down perspective to explicitly acknowledge the implications of the transmission belt function attributed to interest groups for realizing an accountability relationship between members and leaders.

Our study investigates the accountability practices of groups active at the European Union (EU) level. The EU is a highly relevant case because for almost 20 years it has emphasized the importance of internal democratic procedures, effective representative structures and accountability mechanisms within interest groups as being crucial to their 'policy-making partner' status and to enhance the quality of democracy itself. The EU Commission argued that the '… principles of good governance which include *accountability* and openness' should be adopted by interest groups (European Commission 2001, p. 12) (emphasis added). The European Economic and Social Committee (EESC) noted in its 2006 OPINION on *the representativeness of European civil society organizations in civic dialogue* that a key criterion to be considered a representative organization was to 'provide for accountability of its members' (see also European Commission 2003, 2006, p. 5). More recently, the Treaty of Lisbon highlighted the need to increase the legitimacy of the EU by underlining the importance of participation of "representative associations" in the EU democratic life (Art. 11; see Trenz 2009 for a more detailed discussion).

Accordingly, we focus on accountability mechanisms and procedures within membership organizations. Herein, we examine membership-based organizations that represent a variety of societal interests, including citizen-based organizations that advocate for public causes (e.g. environmental and human rights groups), as well as those that represent economic interests (such as trade unions, professional groups and industry federations) (European Commission 2002, p. 6; Beyers et al. 2008). Both group types have significant transmission belt functions, and it is appropriate to examine these organizations in a coherent analytical framework. Our analysis excludes non-membership organizations, such as firms, institutions and foundations.

Our contribution to the study of interest group accountability is twofold. First, building upon earlier work on the accountability of (public) organizations, we develop an analytical framework consisting of three key components of accountability: *information*, *discussion* and *consequences* that characterize a relation between a 'forum' (the membership) and an 'actor' (the leadership). Second, we empirically illustrate our theoretical framework and assess its added value for describing and understanding different dimensions of group accountability relying on a survey of interest groups active at the EU level. Previous studies have indicated the importance of receiving EU funds for interest groups' access to policymakers (e.g. Mahoney and Beckstrand 2011; Persson and Edholm 2018). Herein, we explore the extent to which accountability practices are shaped by EU funding, and control for possible differences across different types of groups and key organizational features such as age and financial resources.

Our exploratory analyses show that there is substantial variation in the extent to which interest groups invest in each of the three accountability dimensions. In addition, we observe that EU funding is not significantly related to any of the three accountability dimensions. However, the type of group (i.e. whether it represents economic or citizen interests) has an effect on organizational accountability practices. More specifically, organizations representing businesses interests more frequently develop accountability practices related to the dimensions of discussion and consequences, whereas citizen groups are more focused on practices related to the information dimension. We discuss and reflect on these findings in more detail in "Conclusion and discussion" section of this article.

An analytical framework of group accountability

In the broader social science and public administration literatures, accountability is considered a key mechanism through which the represented hold representatives responsible for their actions (Bovens 2010). For interest groups, this means that leaders answer for their organizations' performance to '… some stakeholders who can reward or punish' (Brown 2008, p. 2). This is in line with Koop's (2014) and O'Dwyer's and Boomsma's (2015) definitions of voluntary accountability. Koop (2014, p. 565) defines voluntary accountability as '… the degree to which an actor, without being required to, is committed to offering information on and explanation of his or her own conduct to another actor, and may be sanctioned for this conduct', while O'Dwyer and Boomsma (2015, p. 40) note that '… accountability is conceived of as a type of formal oversight and control imposed on individuals and/or organisations … This reflects a traditional view of accountability as a relationship in which people are required to explain their actions'. This implies that, irrespective of individual nuances of forms of representation, elements of informing, discussing and imposing consequences should be part of a framework of group accountability (Bovens 2007; Bovens et al. 2008; Brandsma and Schillemans 2013; Busuioc and Lodge 2016). Group accountability should thus constitute '… a relationship between an actor and a forum, in which (1) the actor has an obligation to explain and to justify his/her conduct (*information*), (2) the forum can pose questions and pass judgement, (*discussion*) and (3) the actor may face consequences for his/her actions (*consequences)*' (Bovens 2007, p. 450). To develop our analytical framework, we first set out the forum and the actor associated with group accountability and subsequently conceptualize the different dimensions of group accountability.

The actor and the forum in group accountability

One of the defining features of groups is that they represent a particular constituency, ranging from companies in a specific industry (e.g. Central Europe Energy Partners, an association of energy companies), people who care about the environment (e.g.

Friends of the Earth Europe) or a specific group in society (e.g. European Youth Forum). Our organizational perspective on accountability mechanisms and procedures means that we consider the membership as the forum to which the organization should be held to account.

Who should be held to account in such membership organizations? In a very broad sense, the group leadership, as a collective actor, should be accountable. As such, it is an 'organizational responsibility', or joint responsibility, rather than a personal one. In practice, though, it will often be the CEO, Director General or the members of the governing body of the group who engage in these discussions with members. At the same time, in many groups, there will be a continuous exchange of ideas and input between staff and members across all layers of the organization. For the sake of parsimony, and in line with our organization-centric and top-down approach, we consider the group as a unitary actor and refer to the group leadership as a collective organizational actor, including senior executives as well as the secretariat. Therefore, when an organization deviates from member preferences, the membership can '… turn directly to the organization and hold it to account for the collective outcome, without having to worry too much about which official has met what criteria for responsibility' (Bovens 2007, p. 467).

Group accountability: information, discussion and consequences

Accountability implies a three-dimensional process that can be considered as continuous and iterative, rather than purely sequential, according to common theories of public accountability (Brandsma and Schillemans 2013). This notion of accountability as an iterative process fits the interest group domain neatly. Group accountability is a process that consists of first, an *information phase* during which group leadership informs the organizations' membership of its proposed action and may also justify past activities and decisions; second, a *discussion phase* during which an exchange of ideas takes place between group leadership and membership; and third, a *consequential stage* in which the group membership may shape the internal governance and the composition of the group leadership.

Information

At the *information* phase, the actor (the leadership) provides an account of their conduct and behaviour to the forum (the membership), related to future plans or past initiatives. In the case of groups, it can include facts and figures regarding results, financial indicators, procedural, policy and strategic issues, prioritization or organizational structure (Behn 2001). This communication with members might be private (via internal channels), but it can also be of a more public nature (for instance, via the organization's website or the media/social media). In this way, our definition implies a broad and contemporary perspective on accountability and involves a wider spectrum of private and public communication activities. The latter category relates to activities such as sharing

statements and positions via the organization's websites, as well as the publication of research reports and communication towards a broader audience via the media. These activities clarify the main positions and planned activities of the organization. Clear communication of organizational policy positions and future objectives enables members to provide informed feedback and input (see Kröger 2018, p. 8).

We focus on the public-facing aspects of the information dimension because groups have multiple relevant audiences (Berkhout 2013) that increasingly demand external accountability and high levels of transparency (see Keating and Thrandardottir 2017 for a discussion related to NGOs). This approach is aligned with recent work on forms of 'voluntary accountability', which acknowledges a non-binding aspect of information provision to wider audiences and includes associated communication practices such as providing information on activities and decisions on the organization's website, publishing annual activity plans and newsletters, as well as issuing press releases (see Koop 2014, p. 565; 571).

The relevance of this public-facing perspective on the information dimension of group accountability is further corroborated by recent research, which demonstrated that groups often consider (online) public forms of communication the ideal way to reach members. As Kohler-Koch and Buth (2013, p. 142) highlighted in relation to EU politics, '… instead of relying on staggered communication through the vertical chain of member organizations, they want to directly address the individuals at the grassroots level and therefore opt for electronic media, including interactive websites and e-newsletters'.

We are well aware that information provision can have multiple purposes beyond accountability—e.g. it can be used as a membership recruitment or retention tool, or as a means of raising an organizations' media profile. Specifically, the more public aspect of the information dimension can be related to the well-established concept in the interest group literature of 'outside lobbying'. Outside lobbying refers to activities aimed at '… mobilizing and/or changing public opinion' (Dür and Mateo 2013, p. 662). While outside lobbying is often discussed in the context of policy influence, it also has much relevance to organizational maintenance. For instance, Hanegraaff et al. (2016, p. 571) argue that '… lobbying can also be viewed as a way to raise funds and to interact with members, donors or patrons'. In this regard, much work points to the value of outside lobbying for group communication, recruitment and retention of members and hence its relevance for taking it into account as important information dimension of interest group accountability.

Discussion

In the discussion phase, the forum (the membership) assesses the information provided by the actor (the leadership) and may ask for additional information and pose follow-up questions (Brandsma and Schillemans 2013). This enables the 'forum to debate with the actor about its conduct' but also represents an opportunity for the 'actor to explain and justify one's past conduct' (Brandsma and Schillemans 2013, p. 955). Previous studies have highlighted variations in how this phase is defined

and operationalized. As noted by Brandsma and Schillemans (2013, pp. 959–960), while some scholars have focused on the norms that 'form the basis of judgement in the discussion phase' (Ashworth 2000; Wang 2002), others have looked at the actual discussion between the forum and the actor, measuring forms of 'questioning by the forum through site visits, evaluations and inquiries' (Carman 2009).

Despite these nuances, a critical feature of the *discussion* dimension is that it involves an 'exchange of ideas' between the actor and the forum. In the case of groups, the institutionalized feature that most organizations have, and that is expected to contribute to discussion, is the annual plenary meeting or the general assembly.[1] In these settings, group members and leaders meet and discuss the activities performed by the organization—e.g. policy positions and priorities, lobbying strategies, membership services, or the financial position of the group. While the annual conference might be the (snapshot) moment where a group is given a more general mandate to focus on certain policy topics, the refinement of this mandate can be an ongoing activity. Obviously, there will be considerable variation in how groups implement this in practice. We therefore relate *discussion* to formal opportunities members have to engage in an exchange with group leaders concerning key dimensions of the role of interest groups in public governance, more specifically the determination of their policy positions and lobbying strategies.

Consequences

The third dimension of the accountability process concerns how the forum passes judgement on the activities of the actor and punishes, corrects or rewards the actor for his/her performance (Brandsma and Schillemans 2013). As Shamsul Haque (2020, p. 25) argues, 'Accountability implies a certain degree of control'. However, consequences may be positive or negative depending on the level of members' satisfaction or dissatisfaction. The goal at this stage is to ensure that the behaviour and functioning of the organization becomes, or remains, aligned with membership preferences. The European Commission expects interest groups to be accountable to their members, and typically a group '… has to explain and justify its conduct to the members or constituencies and it may have to face consequences, either through the mechanisms of elections and voting, or by losing donations' (Kohler-Koch 2010, p. 111). The decision-making power of members and their capacity to block or amend decisions (i.e. their veto power) (Brandsma and Schillemans 2013) is therefore an important aspect of group accountability yet may vary in its actual manifestation across groups. As highlighted by Koop, '… the possibility of sanctions can be formal and explicit, but also informal and implicit' (2014, p. 571).

Our conceptualization of the consequences stage of group accountability focuses on the mechanisms through which members can proactively intervene and are formally entitled to (co)-shape—with the group leadership—the internal governance

[1] It is also important to note that leaders can pick up cues and signals from members through non-institutionalized avenues as well—e.g. surveys, public opinion research, social media, etc.

Table 1 Dimensions of CSO accountability

Component	Conceptualization
Information	Communication activities concerning political activities aimed at an organization's broad constituency
Discussion	Exchange of information on specific policy issues between members and group leaders
Consequences	Formal role of members in internal governance of the organization

and functioning of the organization.[2] The extent to which members are involved in the internal governance of the group is crucial to understand the capacity of members to hold the leadership accountable for their actions and control how the organization functions. To what extent do they have a formal say on issues such as a change to the statutes of the organization? Do members have the power to appoint (or dismiss) the group leadership? If members have such control, then they can impose consequences on the group leadership for its behaviour—i.e. reward or punish.

In summary, we identified three accountability components. First, members of groups need to be informed via a variety of information channels (*information*). We advanced a comprehensive and contemporary perspective on information aligned with the literature on voluntary forms of accountability that emphasizes the importance of public-facing activities. Second, group members should be engaged in activities through which they can exchange ideas and debate with group leaders concerning key aspects of the political engagement of the group, such as its policy positions and lobbying strategies (*discussion*). Finally, group members should have the decision-making power to determine the internal governance and leadership of the organization (*consequences*). Table 1 summarizes the main dimensions of group accountability.

Research design

To assess the relevance of our analytical framework, we empirically assess the occurrence of the three core dimensions of group accountability and potential sources of variation in accountability practices. To do this, we draw on the INTEREURO Survey. This questionnaire was designed to examine organizational characteristics (such as group type, age, resources and whether groups receive EU funding) and the wide array of political strategies groups adopt to influence EU and national policymaking (Beyers et al. 2014). The questionnaire was sent to key policy staff of

[2] We also acknowledge that the 'exit' option might be an important post hoc consequence for groups that do not involve members in decision-making processes. This is important to many groups because they need a stable membership for organizational maintenance and survival. Yet, for the purpose of this article we focus on the more formal procedures that members have at their disposal to control the internal affairs of the group.

2,028 interest groups that were selected from the Transparency Register of the EU,[3] the OECKL Directory, and via elite interviews and media analyses (Beyers et al. 2014; Stamm 2014; Bernhagen et al. 2016). In total, 738 respondents completed the survey between 9 March and 2 July 2015 (Bernhagen et al. 2016). This represents a response rate of 36.2%, which is rather high compared to other recent large-scale web-based surveys of groups.

Our empirical focus concerns the accountability mechanisms between member organizations (the forum) and the organization's leadership (the actor). The sample only includes federated groups active at the EU or supranational level and encompasses both economic and citizen groups. These groups can be European or supranational umbrella organizations and their members are organizations (such as firms or NGOs) and/or (sub) national associations. The complex nested nature of federated groups—as they often gather associations that have other organizations or associations as members—poses particular accountability challenges to these organizations. Importantly, the way in which they implement accountability practices is likely to be different from national associations that tend to have a more homogeneous membership base who are closer to the decision-making power (De Bruycker et al. 2019).

While some of the included organizations, such as the European Law Society, have individual professionals as members, due to the Society's nested membership structure we consider national law societies as the primary members that constitute the forum. Obviously, questions of accountability are relevant to groups with individual citizens as members, such as the Young Academy of Europe whose members are individual young scientists, without a 'national organizational membership' layer between the EU level and individual members. However, given the low presence of such direct individual membership in the group population active at the EU level, we excluded these organizations from our analysis. Consequently, our sample ($n = 410$) includes two broad categories of groups that predominantly have organizations as members: 'Trade, business & professional associations' (labelled as Business & Professional groups, $n = 211$) and 'Non-governmental organizations, platforms and networks and similar' (labelled as Citizen groups, $n = 199$).[4] In line with our definition of the forum and actor, we define group leadership as the actor, operationalized as the key policy staff who completed the survey. The members, to which the key policy staff refers in their answers to the survey questions, are the forum.[5]

Based on several questions in the INTEREURO Survey, we measure the three dimensions of group accountability. Importantly, our measures do not indicate whether an actor is accountable or not, but rather emphasize differences in type and levels of accountability mechanisms set in place (see Koop 2014, p. 565 for a similar

[3] EUROPA—Transparency Register, available at: http://ec.europa.eu/transparencyregister, accessed 16 October 2014.

[4] The groups excluded from the sample are: 'Local, regional and municipal authorities (at sub-national level)'; 'Organizations representing churches and religious communities'; 'other public or mixed entities, etc.'; 'Other similar organizations'; and 'Trade unions'. Together, all these categories only represent 9.95% of the sample, and none of these categories gather more than 14 organizations.

[5] The survey contained a filter, asking the respondents whether their organization was membership based and if so, what kind of members their organization has.

approach). First, our measurement of the *information dimension* relates to the variety of channels and tools that groups use to provide information about their activities to their broad constituency and other relevant stakeholders. As set out above, we focus on the public-facing aspects of the information dimension and more specifically on those activities aimed at providing information to a broad audience. Following Koop (2014, pp. 571–572), we look at recurring elements of information accountability such as maintaining an up-to-date website and publishing newsletters and press releases. Thus, we measure the usage of information tools via a question that asked respondents how their organization typically engages with members through a variety of communication activities. The answer categories are measured on a five-point Likert scale where respondents indicated the frequency with which they seek to engage members in each activity (ranging from 'we did not do this' to 'at least once a week'). The question included multiple means of communication, and we conducted a principal component analysis (PCA) to assess whether an underlying dimension associated with our broad perspective on information could be discerned. In line with recent scholarship and our theoretical framework, the items included in this dimension underline the increasing importance of public forms of communication for informing members (see Table 4 in "Appendix").

To measure the *discussion process,* i.e. the stage where there is an exchange of ideas between the forum and the actor, we use decision-making practices as a proxy to explore the extent to which interest groups discuss and consult their members when deciding and establishing policy positions and strategies rather than examining the existence of formal decision-making bodies within groups. While formal arrangements such as general assemblies offer an opportunity for members to engage in an exchange of ideas, many groups have such a formal arrangement in place, which renders it less useful as discriminatory variable across groups. At the same time, groups will vary tremendously in how they will implement practices to refine mandates that are agreed-upon via such formal decision-making bodies. We therefore focus on two important substantive dimensions of decision-making practices within interest groups to operationalize the discussion dimension. Generally, decision-making practices have been used to study the extent to which groups involve their members (Albareda 2018) and have been found to affect how easy or difficult it is to agree on policy positions within groups (De Bruycker et al. 2019). This variable implies an exchange of information between leader and members and a degree of members' participation in the group (see also, Berry et al. 1993). Moreover, the formalization of the decision-making procedure relates to the norms that 'form the basis of judgement in the discussion phase (Ashworth 2000; Wang 2002)' (Brandsma and Schillemans 2013, pp. 959–960). To operationalize the discussion dimension, we relied on a question for which respondents had to indicate the importance of their membership for (1) establishing positions on policy issues and (2) deciding on advocacy/lobbying strategies and tactics. Both items correspond to the same question focused on how organizations primarily make decisions in different areas. We distinguish between organizations that do not involve their members in any of these activities, those that take decisions on these issues through 'voting among the members', and those that do so by 'consensus'. Similar to our

measurement at the information stage, we conducted a PCA. Two items correlated with an underlying dimension that accurately reflects our conceptualization of discussion and estimates the level of interaction members have with group leaders. This variable ranges from 1 to 5, where 1 indicates that group members do not have any decision-making power in any of the two items and 5 means members decide on both items by consensus (see Table 5 in "Appendix").

Finally, we measure the *dimension of consequences,* which we conceptualized as the decision-making power of members regarding issues of internal governance (e.g. decisions related to the appointment of key leadership posts and changes to statutory rules). Corresponding to our operationalization of discussion, we assume that members have a formal right to provide input (and can impose consequences) through two different decision-making procedures: by 'voting among the members' or by 'consensus.' Again, we performed a PCA to examine whether the individual items reflected a potential underlying dimension that fits our conceptualization of the dimension of consequences. The analysis reveals four items related to the involvement of members in internal governance (see Table 6 in "Appendix"). The variable then ranges from 1 to 5, where 1 means that group members do not have decision-making powers in any of the items related to consequences, while 5 indicates that the members decide by consensus on the four items used to operationalize this accountability dimension. In addition, Table 7 in "Appendix" presents the descriptive statistics and a correlation matrix among the three accountability dimensions as well as the other variables included in the multivariate analyses in the next section.

Analysis

Our analysis proceeds in two steps. We first provide an empirical description of the analytical dimensions of group accountability from our sample of organizations active at the EU level. We subsequently offer a first exploratory analysis regarding potential sources of variation of accountability across different groups by considering EU funding, common organizational features such as group type, age and resources, and the level of access groups have to EU public officials.

Group accountability in the EU: taking stock

To what extent do groups active at the EU level inform their members and broader constituency about organizational performance and activities? To what extent do they engage in an exchange of ideas with their membership? Are there consequential procedures in place when their membership does not agree with the leadership's chosen course of action? In this section, we present descriptive statistics concerning the three dimensions of group accountability. The histograms presented in Fig. 1 in "Appendix" include the constructs used to measure each

Table 2 Descriptive statistics of accountability components

Variable	*N*	Mean (S.D.)	Min–max
Information	256	2.391 (.840)	1–5
Discussion	377	2.419 (1.547)	1–5
Consequences	336	2.764 (1.113)	1–5

dimension and illustrate the occurrence of each of the accountability dimensions discussed below.

The communication practices used to measure the *information* dimension of group accountability—including contacting journalists to increase media attention, active involvement in media debates, publishing statements and position papers on the website and publishing research reports and brochures—have a right-skewed distribution. Only 27% of the observations engaged in information activities at least once every three months or more frequently. The mean and distribution of each of the underlying items that compose this variable are roughly similar (except for the item 'Publish statements and position papers on your own website', which is somewhat higher) and suggest that most groups have some sort of information mechanism in place.

The second dimension of group accountability involves *discussion*. In this case, the distribution of discussion accountability is strongly right-skewed. More specifically, 46% of the groups do not involve their members in the decision-making process to establish policy positions and decide on advocacy strategies. Furthermore, in only 19% of the cases, members decide by consensus on the two components related to the discussion dimension of accountability discussion.

The third dimension of accountability we examine is *consequences*; this relates to the decision-making power of members in internal governance. We observe that in 14% of groups, members do not have any say in these decisions. The results also indicate that only 9% of groups have the four items used to measure the capacity of members to impose consequences on the internal governance of the group. Despite the significant number of group members who do not have a say on the organization structure, these results indicate that in the majority of cases, members have some sort of capacity to shape the internal governance of the group (even though it might be limited to a small set of decisions). Accordingly, they have the formal right to intervene when they disagree with organizational practices (Table 2).

Exploring group accountability: information, discussion and consequences

The previous section demonstrated that while the three dimensions of group accountability can be identified to a varying degree in our sample, their presence and strength vary. To better understand this, we analyse the variance in accountability practices. We first assess the impact of EU funding on groups' good

governance practices. It is worth noting that relations between interest groups and the EU can have a significant impact on the structure and operation of the interest groups it funds. For example, Sanchez-Salgado (2011, p. 5; 9) has argued that EU patronage has shaped interest groups' 'organizational structures and management techniques' and facilitated the growth and professionalization of some organizations. At the same time, the Commission has emphasized that it '… fully respect(s) the independence of the organization and does not intend to interfere in their structure' (Pérez-Solórzano Borragán and Smismans 2012, p. 412). We measure EU funding via a question that asks respondents to indicate the percentage of their annual budget that came from EU institutions—this variable ranges from 0 to 100. Descriptive statistics show that 63% of the groups in our survey do not receive any EU funding and, on average, 13.8% of their income comes from the EU.

We further control for three organizational features of groups commonly included in studies of their involvement in EU governance, namely *group type, age* and *resources.* Group type is measured by a dummy variable that captures the distinction between Citizen Groups (coded as 0) and Business & Professional Groups (coded as 1) to examine whether accountability and its dimensions vary across these different types of groups. Secondly, we include the log of age as this is often related to differences in organizational development and complexity (Mintzberg 1983) and therefore could also affect accountability practices. For example, as organizations mature, they may become more prone to take members' support for granted and engage in fewer accountability practices (e.g. Koop 2014, p. 570). Thirdly, the variable resources is captured through the logged number of FTEs in the organization. As argued by Koop (2014, p. 566), '… commitments to [voluntary] accountability impose considerable costs on organizations. As accountability involves the provision of information and explanation, it requires human and financial resources'.

Lastly, we also include *access,* operationalized as the frequency with which the organization has been involved in serving on advisory committees at the EU level. This is an important variable that might affect groups investment in accountability dimensions, as maintaining accountability practices might be more difficult when groups are policy insiders that face high demands from policymakers (Saurugger 2012).

Table 3 presents three ordinary least squares regressions, one for each accountability dimension.[6]

[6] Importantly, the three variables used to assess the accountability components (Table 2) are independent and the highest correlation is found between the two variables related to discussion and consequences. Yet, this correlation is below .4; hence, we can safely assume that the two variables are substantively different. To control for missing cases, the same analyses have been conducted with the 174 observations for which we have complete data. Importantly, the same values hold at a very similar level. In addition, multiple imputation estimates ($n = 410$) lead to the same results and significant levels, with only three exceptions: age is not negatively related to information, yet it becomes positively and significantly related to the consequences dimension; EU funding is negatively related to the discussion dimensions, yet the coefficient is very low (−.006; p value = .092); and access is not significant anymore for the consequences dimension (p value = .177).

Table 3 Explaining dimensions of CSO accountability

Explanatory factor	Information	Discussion	Consequences
EU funding	.000 (.002)	− .003 (.004)	.001 (.003)
Citizen groups	REF	REF	REF
Business and professional groups	− .272* (.115)	.768** (.245)	.422* (.191)
Age	− .116^{+} (.069)	.030 (.145)	.151 (.115)
Resources	.282*** (.041)	− .013 (.086)	− .133* (.065)
Access	.317*** (.049)	.202^{+} (.060)	.133^{+} (.079)
Constant	1.940*** (.219)	1.443** (.462)	1.816*** (.372)
N	210	205	184
Adjusted R^2	.348	.078	.059

$^{+}p \leq .1$; $^{*}p \leq .05$; $^{**}p \leq .01$; $^{***}p \leq .001$

Our results indicate that EU funding is not significantly related to any of the accountability dimensions. Receiving money from EU institutions does not affect the extent to which interest groups invest in organizational mechanisms to promote information, discussion and consequences. EU funding does not appear to encourage a more intensive exchange of information and discussion between the leaders and group members, neither does it reinforce the ability of members to control the internal governance of the organization through consequences.

If we consider the effects of other organizational features, our results indicate that members of business and professional organizations have a deeper engagement with the discussion and consequences aspects of the accountability process, whereas citizen groups more often demonstrate practices related to the information dimensions. Our results suggest that when it comes to the specific practices of discussing policy positions and lobbying strategies, and the ability to shape the internal governance and impose consequences on the leadership, business groups offer more opportunities to their members than citizen organizations. This could relate to the more complex and developed organizational structures of business groups, compared to citizen groups, or the greater ease with which firms and business professionals can be involved in group decision-making (see Walker 1983). Accordingly, citizen groups appear to invest less in practices related to the dimensions of discussion and consequences, but are more proactive in informing their members through public-facing communication mechanisms.

These results are aligned with research that highlights the limited discussion with, and responsiveness towards, the grassroots level within citizen-based interest groups active at the EU level (Kohler-Koch and Buth 2013, see also Warleigh 2001, 2003). These groups are often focused on political efficiency, rather than functioning as 'transmitters of aggregated policy positions from CSOs of different member states' (Defacqz 2018, p. 134). In contrast, members of business organizations often want and seek more control over their groups' structure and activities (Wilson 1995;

Greenwood 2007, p. 349; Berkhout et al. 2019). This could imply that citizen-based group leaders are more autonomous and arguably less accountable to their members, than the leadership of business groups (see De Bruycker et al. 2019).

Our second organizational feature, age, is only negatively related to information accountability, indicating that younger groups more actively invest in this dimension. Resources have a positive effect on 'information' and a negative effect on 'consequences'. This suggests that, contrary to Koop's (2014, p. 566) argument, the financial capacity of a group is not key to the development of internal democratic practices and could imply strong path dependencies: once certain processes for member involvement have been established, they tend to remain stable over time (Pierson 2004, pp. 17–53; Blee 2012). Lastly, groups with greater access to EU public officials score higher on information, discussion and consequences. That is, having more meetings with public officials at the EU level does not hinder the ability of groups to invest in the three accountability dimensions. This is aligned with previous research that finds that involving members has the potential to be a 'beneficial inefficiency', because while it generates additional organizational costs, it ultimately results in better access to public officials (Grömping and Halpin 2019; Heylen et al. 2020). It may also be the case that members (especially in business and professional groups) can provide authoritative information that can enhance the possible policy influence of the organization.

Conclusion and discussion

To better understand group accountability, this article proposes a theoretical framework consisting of three core dimensions of accountability. In order to be accountable to their members, group leaders should keep members well-informed on matters crucial to organizational performance and policy activities; engage in a meaningful exchange of ideas on the organizations' course of action; and have mechanisms that ensure that the group leadership faces consequences when members disagree or object to the decisions they make. Based on this framework, our empirical analysis assessed the occurrence of accountability practices and offered a first exploration of the variation across different groups to illustrate the added value of our analytical approach. While our empirical assessment focused on groups active at the EU level, we believe this theoretical framework and the dimensions we identify are equally relevant for groups active at the national level. The forum, the type of members and their relationship with the group leadership might take different forms and require an adjusted operationalization of the dimensions for an application at different levels of government. Yet the principles of information, discussion and consequences are equally relevant to assess the accountability of groups across different levels of government.

Our findings indicate that most groups display elements of each of these three dimensions to a varying degree. While considering the limitations related to the

operationalization of the variables, we observe that the three dimensions have very similar means and none are more frequently found in our sample. We also see that EU funding has no effect on the extent to which groups involve their members and practice each of the accountability dimensions. Lastly, compared to citizen groups, organizations that represent business interests generally demonstrate more interaction with their members through practices relate to the discussion dimensions, and their members more frequently have the decision-making power to impose consequences on the leadership. Citizen groups appear more focused on the information provision towards their member through the channels assessed in this article, as these practices were less frequent among business association.

Some of our findings may be partly influenced by our research design. We therefore discuss several potential issues related to our approach before we turn to the implications of our research.

First, the nested nature of EU and supranational groups is a distinct characteristic that may lead to the presence or absence of certain accountability mechanisms when compared to national associations with citizen members (see Hollman 2018). In that regard, the same theoretical framework should be applied in a comparative research design (e.g. Berkhout et al. 2017) including national, EU and international groups to assess whether the accountability scores obtained by EU-level groups are relatively high or low.

A second important implication of our findings is the potential (small) impact of institutional factors on accountability mechanisms put in place, illustrated by the null finding on EU funding. As noted above, it is remarkable that EU patronage does not reinforce accountability practices given that the European Commission places such a strong emphasis on good governance and internal democracy within groups (European Commission 2001). Some unexplored but relevant mechanisms that need to be examined in future work relate to the question of how the specific political and institutional environment in which groups operate, and the extent to which they are confronted with competition for members, affects the various accountability practices groups adopt. Thirdly, groups included in this study have organizations as members. Consequently, the jury is still out regarding the extent to which individual membership groups, that are more common at the national level, would be more accountable to their members than organizational membership groups.

Third, we opted for an organizational-centric and top-down approach. However, as noted by Kröger (2018, p. 10) for some interest groups it is not so much the absence of participatory opportunities that explains the low level of interactions, but rather '… the limited usage actors made of these structures, because of a lack of resources and/or because of a lack of interest'. In other words, future research needs to assess the actual involvement and use of accountability mechanisms by members as well to provide a more comprehensive assessment of interest group accountability. Lastly, our operationalization of information accountability focuses on public-facing communication practices and is largely in line with previous work on horizontal and voluntary accountability. However,

the internal provision of information is important and could be affected differently by the variables that we considered. Relatedly, our operationalization of the other dimensions (discussion and consequences) focused on selected aspects as well, but as groups are likely to vary in the accountability practices they adopt (and thus demonstrate a richer variation of such practices), future work should include a more fine-grained operationalization of the three accountability dimensions to more accurately capture the full variation and prevalence of group accountability practices.

One important implication of our analysis is that it is difficult to assess whether the accountability practices of EU and supranational interest groups active at the EU level are high or low, as we do not yet have a clear benchmark. However, more intense accountability practices are likely to improve the legitimacy of these organizations and their claims thereto. At the same time, from an organizational perspective, it is questionable whether the benefits actually outweigh the costs, in terms of financial resources and time, or the increased likelihood of rising members' discontent. In conclusion, our findings and their implications point to the relevance of understanding group accountability in a more systematic way, and in this article, we have offered an analytical framework to theoretically structure future empirical endeavours.

Appendix

See Fig. 1 and Tables 4, 5, 6 and 7.

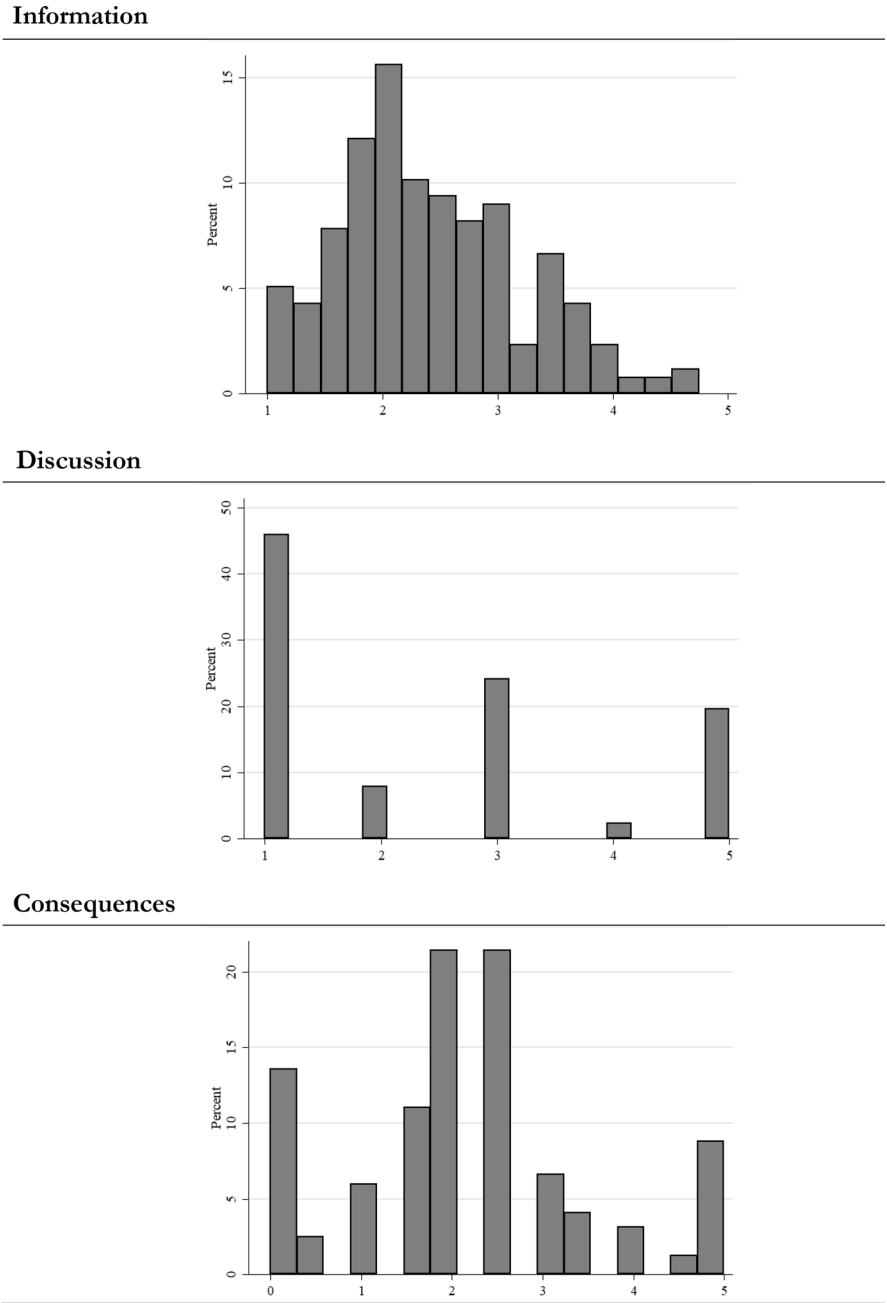

Fig. 1 Distribution of accountability dimensions

Table 4 Information construct

Item	Mean (S.D.)	Loadings
How often has your organization engaged in the following activities?		
Organize press conferences or distribute press releases	2.184 (1.053)	.410
Publish research reports and brochures	2.228 (.879)	.411
Active involvement in media debates such as giving interviews, editorials, opinion letters	2.281 (1.114)	.393
Publish statements and position papers on your own website	2.904 (1.074)	.374
Cronbach's alpha		.832

$N = 246$; rotation: orthogonal varimax (Kaiser on)

Response options and values: 1 = we did not do this; 2 = at least once; 3 = at least once every 3 months; 4 = at least once a month; 5 = at least once a week

Table 5 Discussion construct

Item	Mean (S.D.)	Loadings
How does your organization primarily make decisions in the following areas?		
Establishing your organization's position on policy issues	.410 (.453)	.554
Deciding on advocacy/lobbying strategies and tactics	.294 (.433)	.643
Cronbach's alpha		.660

$N = 278$; rotation: orthogonal quatrimax (Kaiser on)

Response options and values: 0 = other decision-making procedure; 1 = voting among members; 2 = consensus among members

Note: In order to make the scales for our three dimensions comparable, we recode this variable to create a scale that ranges from 1 to 5, where 1 means that a CSO relies on 'other decision-making procedures' for the two items and 5 means that a CSO relies on 'consensus among members' to decide on the two items

Table 6 Consequences construct

Item	Mean (S.D.)	Loadings
How does your organization primarily make decisions in the following areas?		
Budget	.384 (.385)	.433
Appointing board members	.488 (.310)	.508
Appointing chairperson	.385 (.353)	.406
Changes to statutory rules or the constitution, etc	.506 (.344)	.516
Cronbach's alpha		.817

$N = 263$; rotation: orthogonal quatrimax (Kaiser on)

Response options and values: 0 = other decision-making procedure; .5 = voting among members; 1 = consensus among members

Note: In order to make the scales for our three dimensions comparable, we recode this variable to create a scale that ranges from 1 to 5, where 1 means that a CSO relies on 'other decision-making procedures' for the four items and 5 means that a CSO relies on 'consensus among members' to decide on the four items

Table 7 Descriptive statistics and correlation matrix of dependent and explanatory factors

Variables	*N*	Mean (SD)	Min–Max	1	2	3	4	5	6	7
1. Information	256	2.392 (.840)	1–5	–						
2. Discussion	377	2.419 (1.547)	1–5	−.017	–					
3. Consequences	336	2.765 (1.113)	1–5	−.030	.356*	–				
4. EU funding	380	13.834 (24.884)	0–100	.165*	−.172*	−.123*	–			
5. Group type	410	.514 (.500)	0–1	−.173*	.225*	.238*	−.446*	–		
6. Age (log)	401	2.981 (.775)	1.098–5.753	.062	−.006	.114*	−.061	.130*	–	
7. Resources (log)	348	1.101 (1.218)	−.693–6.214	.478*	−.015	−.117*	−.141*	.024	.284*	–
8. Access	257	2.000 (1.023)	1–5	.406*	.096	.096	.102	.046	.060*	.152*

*$p < .05$

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