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Understanding the drivers of voluntary accountability by European Union agencies: look to the forum!

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Citation

Boer, T. C. de. (2023, September 19). *Understanding the drivers of voluntary accountability by European Union agencies: look to the forum!*. Retrieved from <https://hdl.handle.net/1887/3641690>

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**UNDERSTANDING THE DRIVERS OF VOLUNTARY
ACCOUNTABILITY BY EUROPEAN UNION AGENCIES:
LOOK TO THE FORUM!**

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Cover design: Flo Kortekaas

Printing: thesis specialist Ridderprint, ridderprint.nl

Layout and design: Anna Bleeker, persoonlijkproefschrift.nl

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UNDERSTANDING THE DRIVERS OF VOLUNTARY ACCOUNTABILITY BY EUROPEAN UNION AGENCIES: LOOK TO THE FORUM!

Proefschrift

ter verkrijging van
de graad van doctor aan de Universiteit Leiden,
op gezag van rector magnificus prof.dr.ir. H. Bijl,
volgens besluit van het college voor promoties
te verdedigen op dinsdag 19 september 2023
klokke 16.15 uur

door

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geboren te Amsterdam
in 1993

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This PhD thesis is part of a project that has received funding from the European Research Council (ERC) under the European Union's Horizon 2020 research and innovation programme (grant agreement No 716439).

ACKNOWLEDGMENTS

Even though I have largely written this dissertation during a pandemic, I enjoyed every part of it. From start to end, it was a very valuable, interesting, informative and most of all joyful process. This is because of the great people around me, who have helped me tremendously throughout the process with their knowledge, guidance, support and humour.

I am immensely thankful to my supervisors Madalina Busuioc, Kutsal Yesilkagit, Dovilė Rimkutė and Saar Alon-Barkat for their very generous feedback and their overall support. I have learnt a great deal from you. Not only about accountability, bureaucratic reputation and European governance, but also about how to survive academic life. I count myself lucky to have had you as my PhD supervisors. Madalina, I deeply appreciate all effort that you have put towards helping me succeed as an early-career academic researcher. Saar, many thanks for your enthusiasm and your methodological advice. Dovilė, thank you for your often very funny insights about academic life as well as your sharp and helpful feedback. I am also grateful to have had the opportunity to write my PhD thesis in close cooperation with Benjamin. We are a great team together. But more importantly, going through the process of writing a PhD thesis would have been much, much less fun without your presence. Thanks for all the good moments.

I also would like to thank my (former) colleagues at the Institute of Public Administration, Leiden University, who made me feel at home right from the start. The Institute is filled with brilliant and kind colleagues who are always ready to help if needed. A big thank you goes to the group of wonderful (ex-)PhDs at the Institute. This group includes among others: Adrià, Annelieke, Bernard, Daniëlle, Eduard, Emily, Erin, Hugo, Lynn, Machiel, Marieke, Moritz, Neli and Samir. The same warmth and brilliancy I experienced at the Department of Political Science and Public Administration, Vrije Universiteit Amsterdam. Even though I have only worked at the Department for a short period of time, I am sad to leave you already.

I finally want to thank my family and friends. I am especially thankful to Susan. I would not have been able to write this dissertation without your love and support.

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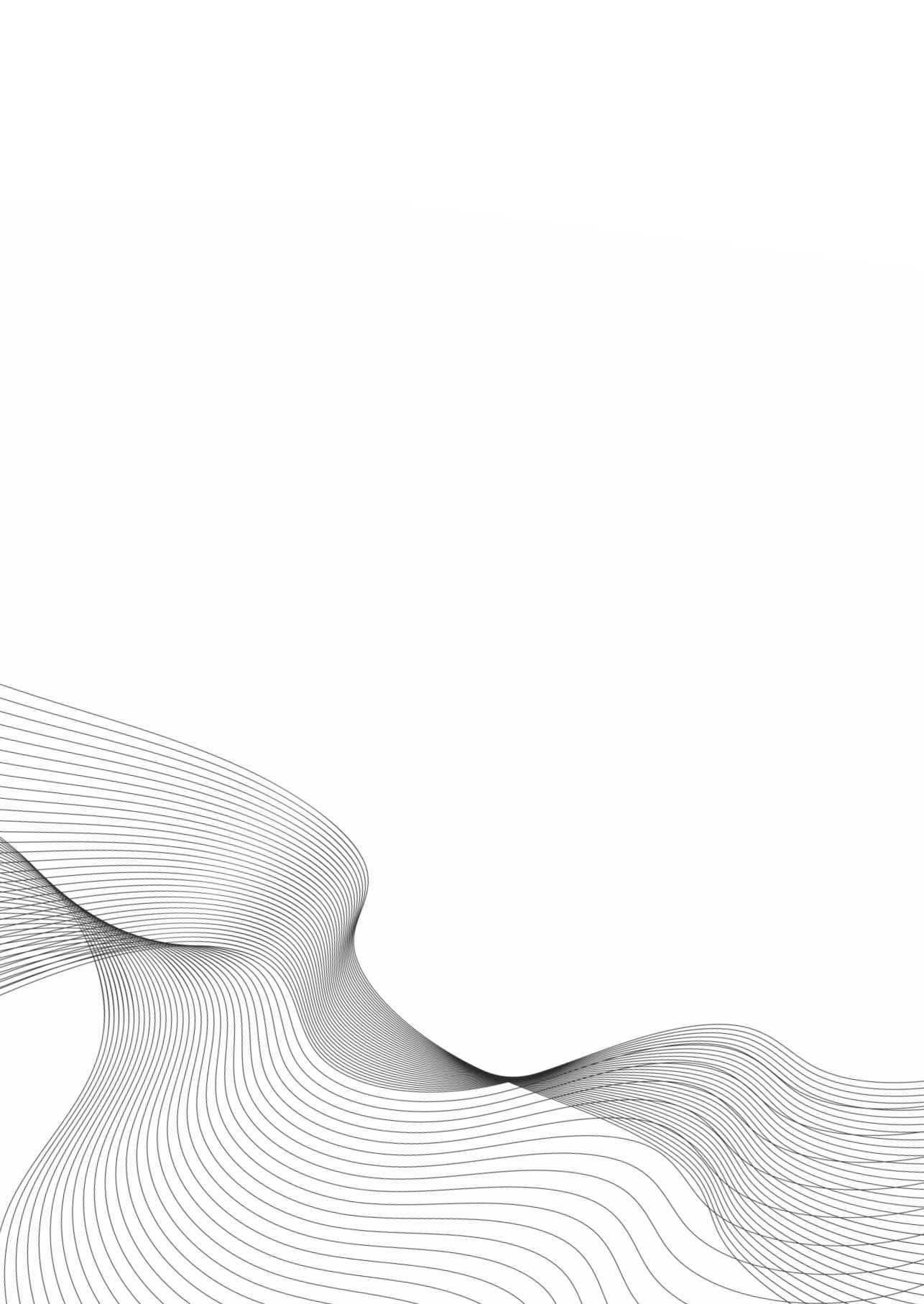
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CHAPTER 1

| Introduction

On 21 December 2020, Emer Cooke, executive director of the European Medicines Agency (EMA), announced in a livestreamed press briefing that the first-ever vaccine against COVID-19 – developed by BioNTech and Pfizer – would be granted conditional market authorisation in the European Union (EU). After the director's announcement, the floor was opened to questions from journalists who were attending the meeting virtually from across the world. The questions were clear reflections of the dominant, rather negative public discourse about the agency at the time. For example, a journalist asked why EMA needed to take more time to reach a decision than the pharmaceutical regulators in the United States (US) and the United Kingdom (UK). The same journalist asked how EMA made sure to steer clear from political pressures and, more specifically, whether public calls from national politicians to reach a decision quickly were the reason that EMA's decision came earlier than the agency had previously communicated. Other journalists asked, among others, about "caveats" and "unanswered questions" regarding the safety and effectiveness of the vaccine for specific groups such as pregnant women and certain age groups. The director and EMA scientists answered the questions from the digital audience in great detail and defended the agency's approach, thereby giving additional, specific insights about how and why the agency came to its decision. EMA continued to regularly organise press briefings about developments in the regulation of COVID-19 medicines in the EU. All briefings can be viewed on EMA's YouTube channel (<https://www.youtube.com/user/emainfo>).

This is an exemplary case of what is referred to in the public administration literature as voluntary accountability. In the case above, EMA made itself accountable to the media, and by extension to the society at large, by facilitating a venue in which journalists had the opportunity to publicly and in real-time question agency top-level officials, demanding of them to explain and justify the soundness of the agency's regulatory decision. By opening up to external scrutiny in this way, the agency faced potential consequences. The press briefing was not a noncommittal exchange of views. Renowned news agencies and media outlets, such as Politico (Deutsch, 2020), Bloomberg (Kresge & Ring, 2020) and Associated Press (Jordans & Cook, 2020), included the information provided by the agency during the press briefing in their reporting, often directly quoting the words spoken by EMA officials. Moreover, as of now (December 2022), the videorecording of the press briefing has been viewed almost 10.000 times on YouTube (European Medicines Agency, 2020). As such, the agency's voluntary account about its regulatory decision plausibly has had reputational implications for the public image of the agency and it might perhaps even have had an effect on citizens' confidence in the safety and efficacy of the new COVID-19 vaccine.

EMA is by far not the only public agency that engages in voluntary accountability. Studies have found that many public agencies – at local/regional (Verschuere et al., 2006), national (Koop, 2014; Magill, 2009; Yesilkagit & Van Thiel, 2008) and supranational levels (Arras & Braun, 2018; Busuioc, 2013; Busuioc & Jevnaker, 2022; Piquet, 2021; Wood, 2018) – have committed themselves voluntarily to accountability. Voluntary accountability can take many different forms. Previous research has documented a wide variety of voluntary accountability practices, including among others self-initiated consultation procedures, interactions on social media, interactive

websites, voluntary external reviews, agency requests for parliamentary hearings, consultative forums, codes of conduct, newsletters and press releases. Such practices are complementary to accountability mechanisms mandated by law.

The emergence of voluntary accountability as a widespread and ‘persistent’ (Reiss, 2011, p. 647) phenomenon is significant since accountability is a core concern in public administration. Holding public officials, and the organisations they work for, accountable is instrumental for legitimizing government actions, avoiding abuse of powers and enhancing public sector performance (Bovens et al., 2008). Especially since the fragmentation of the public sector brought on by public management reforms, such as the implementation of the New Public Management agenda, there have been concerns about the inadequacy of traditional accountability arrangements (e.g., ministerial responsibility) in modern governance (Haque, 2000; Lægreid, 2014; Overman et al., 2015). Traditionally, accountability in the public sector is defined as the legal obligation to respect and comply with the legitimate interests of those affected by the exercise of public authority (Mulgan, 2000; Strøm, 2000). Hierarchy has been the main mechanism of accountability for realising this. An organisation or individual exercising public authority needs to report to its direct superior higher up in the ‘chain of command’, as to connect it to ‘the democratic current that runs throughout contemporary systems of public governance and administration’ (Jarvis, 2014, p. 406). However, this traditional model of accountability has come under pressure in the disaggregate context of today’s public sector. New modes of governance erode traditional notions of accountability and are therefore prone to accountability gaps (Considine, 2002; Hodge & Coghill, 2007; Kerwer, 2005; Lodge & Stirton, 2010; Maggetti, 2010; Mills & Koliba, 2015; Papadopoulos, 2007; Willems & Van Dooren, 2011). Given the limitations of traditional accountability arrangements in modern governance, some view safeguarding accountability even as ‘THE public administration challenge of our time’ (Dubnick & Frederickson, 2010, p. i143).

Voluntary accountability offers *a beacon of hope* amidst concerns about the risk of unaccountable agents. Voluntary accountability is seen as a remedy that could alleviate, and perhaps even help to overcome, accountability problems in the public sector (Brummel, 2021; Koop, 2014; Schillemans, 2011; Scott, 2006) and as such may help to safeguard accountability in modern governance (Michels & Meijer, 2008). Voluntary accountability potentially stands to reinvigorate accountability in the fragmented world of modern governance. The promise of voluntary accountability is that it can be a solution for when public authority is exercised by organisations for which traditional accountability mechanisms are either difficult to realize or ineffective. This includes for example situations where a non-majoritarian status is considered a prerequisite for the well-functioning of public authority or when hierarchy is absent (Acar et al., 2008; Michels & Meijer, 2008; Schillemans, 2011; Wood, 2015). The well-documented rise of voluntary accountability may thus be good news for the state of accountability in modern governance. It also can be seen as a positive step towards finding more constructive accountability practices that work for, and are supported by, public agencies themselves (Compton et al., 2021; Douglas et al., 2021), against the backdrop of increasingly pessimistic views about accountability in contemporary democracies as a facilitator

of a culture of blame, undue negativity about the public sector and stereotypical thinking (Aleksavska et al., 2019; Flinders, 2011; Keane, 2009).

Despite these positive connotations and high expectations, voluntary accountability is, however, poorly understood from a theoretical standpoint. It is a somewhat *counterintuitive organisational behaviour* as dominant theory, most notably, principal-agent theory, portrays public agencies as generally accountability-avoidant. While existing studies have extensively described organisational variation in the adoption of voluntary accountability, the array as well as the type of forms adopted, they often do not actually empirically study, and elucidate, the organisational motivations behind these developments. So far, a variety of mechanisms have been proposed as the dominant driver of voluntary accountability. Yet, it is unclear which of them prevails due to the lack of comparative, explanatory studies. Hence, it is unclear *why* agencies choose to voluntarily take on costly accountability activities in the absence of formal obligations in this respect. This means for instance that we have limited insight into why EMA chose to be accountable in the case illustrated above and why it opted for account-giving to the media, nor in what counterfactual situation the agency would have preferred a different type of accountability or avoided accountability altogether. In order to better understand such societally relevant and theoretically intriguing organisational behaviour, *this dissertation focusses on the drivers of voluntary accountability*. By studying the drivers of voluntary accountability, it uncovers what motivates agencies to engage in organisational behaviour that could contribute to overcoming the accountability problems that modern governance reportedly suffers from.

A core, unique contribution of this dissertation is that it draws attention the role of the forum in voluntary accountability – that is, the audience to whom account is rendered. Paradoxically, while voluntary accountability is self-imposed by the account-giver (or “actor” in accountability terminology), the account-holder (or “forum” in accountability terminology) is a crucial – yet hitherto underexposed – piece in the puzzle of understanding why public agencies seek accountability. The role of the forum in voluntary accountability is twofold. *First*, taking into account the forum provides us with much-needed conceptual boundaries for what constitutes and qualifies as voluntary accountability. At its core, accountability is *an interaction* between an actor and a forum. Irrespective of whether voluntary or not, this relational aspect is critical to whether a practice can qualify as accountability. There is a real risk that by defining voluntary accountability solely based on the actor’s behaviour – and neglecting the role of the forum – a too rosy picture about the state of accountability in modern governance will emerge because one-sided, unanswered attempts at account-giving can be misclassified as instances of accountability. In order to avoid this risk, the agreed-upon *relational nature of accountability* must be taken seriously and anchored more firmly in our conceptualisation of voluntary accountability. In particular, forum engagement – whether forums respond to account-seeking efforts – is identified in this dissertation as a crucial aspect for assessing whether public agency initiatives at account-seeking actually materialise into accountability. *Second*, this dissertation reveals that the *identity of the forum* (who is targeted by account-seeking accounts?) is a *critical clue* as to why a specific mechanism becomes activated, in other words, as to why actors seek voluntary accountability.

Even though voluntary accountability is self-imposed and therefore conditional on the actor's appetite for accountability, audiences targeted by voluntary accounts are an important part of the answer in unearthing the drivers of accountability-seeking behaviour. Accountability-seeking motivations are intimately inter-linked to the relationship actors seek to cultivate and cannot be elucidated in abstract thereof. This is to say that even though voluntary accountability originates from the account-giver, voluntary accountability is in large part *a story of forums*. Hence, as it will be shown in this dissertation, making sense of voluntary accountability requires us to *look to the forum*.

This chapter introduces the dissertation and the rationale behind it. *First*, this chapter introduces the concept of accountability, explains why the phenomenon of voluntary accountability is somewhat at odds with dominant theory and summarizes attempts that have been made to reconcile theory and observed patterns of voluntary account-giving in the public sector. *Second*, it describes the theoretical perspective taken in this dissertation and outlines existing research gaps. *Third*, the main research question and the sub-questions are outlined and explained. Fourth, the research design and the case selection are described. *Finally*, this chapter states the scientific and practical relevance of this dissertation and provides an outline of the rest of the dissertation.

1.1 VOLUNTARY ACCOUNTABILITY: CONCEPT AND THEORY

Accountability typologies abound in the literature (for an overview, see Willems & Van Dooren, 2012) and many different definitions have been proposed (e.g., Bovens, 2007; Lindberg, 2013; Mulgan, 2000; Philp, 2009). One reason for this is that accountability is an 'elusive' (Bovens, 2007), 'magic' (Pollitt & Hupe, 2011) and 'chameleon-like' (Sinclair, 1995) concept. Accountability, Bovens et al. (2008, p. 226) famously wrote, 'is one of those golden concepts that no one can be against.' The concept has strong positive connotations as it brings up associations with notions such as good governance and integrity. It is an undisputed public value that is generally seen as intrinsic to democratic governance. In this dissertation, Mark Bovens' influential conceptual framework of accountability (Bovens, 2007, 2010) is taken as the starting point for analysing and assessing voluntary accountability. In this framework, accountability is understood as a *relational mechanism*. Bovens (2007) identifies four questions pertinent to the study of accountability: *Who* is accountable *to whom*, *for what* and *why*? These questions pertain to the identity of the actor, the identity of the forum, the nature of the relationship between the two and the accountability standard used to evaluate the actor's conduct (Aleksavska, 2021). A number of different answers have been identified to each of these four questions, reflecting the wide variety of accountability mechanisms found in the public sector.

Research on *voluntary* accountability is principally concerned with the *why* question. While the activation and timing of *mandatory* accountability mechanisms is decided upon by an external authority (e.g., deadlines for annual reports, yearly audits, periodical evaluations), voluntary account-giving occurs of an agency's own accord. Hence, why account is rendered is relatively straightforward in the case of mandatory accountability: The actor simply needs to comply with formal obligations. By contrast, no such simple answer exists when accountability is self-

imposed. Voluntary accountability, by definition, crucially hinges upon an agency's motivation to render account (Magill, 2009) – in the absence of formal accountability provisions. Consequently, the occurrence of voluntary accountability is a direct function of an agency's motivation to be accountable. Unmotivated agencies will simply not initiate voluntary accountability practices and might even discontinue existing ones. Ascertaining why account is rendered is therefore the focal point of the scholarly debate regarding voluntary accountability.

Different rationales have been proposed as to what motivates public agencies to engage in voluntary accountability. These rationales reflect more or less competing views about which theoretical model best explains accountability behaviour and outcomes in the public sector. Traditionally, accountability has predominantly been studied through the lens of *principal-agent theory*. This theory revolves around situations where one actor (i.e., the principal) delegates a task to another actor (i.e., the agent). Two core assumptions are central to the canonical principal-agent literature. First, the goals of the principal and the agent are nonaligned yet they both wish to maximize their individual utility, which leads to *goal conflict*. Second, the agent has more information than its principal, which results in an *information asymmetry* between the two parties. It follows from these core assumptions that a public agency, acting as an agent to whom public authority has been granted, has its own bureaucratic preferences that can diverge from those of political executives (Miller, 2005; Shapiro, 2005). Coupled with informational asymmetries that advantage the agent, this creates the opportunity for bureaucratic or agency drift. This refers to the agent deviating from its original mandate by pursuing its own particularistic interests (McCubbins et al., 1987). This is where accountability comes in. Accountability mechanisms, such as oversight and procedural controls, act as a check on the agent to ensure its actions and decisions align with principal preferences, thereby restraining the agent's opportunities to drift (McCubbins et al., 1987). Building on this, dominant accountability frameworks conceptualize accountability as a single, unitary and hierarchical chain that runs opposite to the chain of delegation (Strøm, 2000). The objective of accountability from this perspective is to provide formal incentives for the agent to make decisions that align with principal preferences, so that each agent in the chain acts in the interest of its principal (Gailmard, 2014). Thus, accountability is a solution to agency problems. It keeps agents in check.

From the perspective of principal-agent theory, it is expected that public agencies are keen to resist or escape accountability mechanisms and to preserve the existing information asymmetry. Accountability provisions put control in the hands of the agency's political masters such as the political executive or the legislature, thereby curtailing the discretion of the agency and limiting its room to act. The 'traditional assumption' in the public accountability literature therefore has been that 'rational agents would try to defy, duck or game accountability obligations' (Schillemans & Busuioac, 2015, p. 203). Hence, it is puzzling to understand why an agency would commit voluntarily to accountability as this removes the agency's informational advantage vis-a-vis its political overseers. That is to say that the empirical phenomenon of voluntary accountability does not sit well with the assumption from principal-agent theory that agents benefit from maintaining the existing information asymmetry.

Consequently, the rise of voluntary accountability challenges the theoretical underpinnings of traditional understandings of accountability. In response to this, researchers have attempted to close the gap between theory and practice. Broadly speaking, two approaches can be distinguished. On the one hand, there are those who have sought to *amend* principal-agent theory in order to reconcile the empirical phenomenon of voluntary accountability with theoretical underpinnings that form the basis for dominant accountability frameworks (for a general discussion, see Maggetti & Papadopoulos, 2018). For instance, Koop (2014) has suggested that agencies may rationally choose to incur the costs of making voluntary commitments to accountability – so-called “bonding costs” (Jensen & Meckling, 1976) – in an attempt at pre-empting stricter, more costly mandatory provisions. As noted by Koop (2014, p. 578), “[p]ublic organizations may commit to voluntary accountability as a bonding activity to prevent their principals (politicians) from introducing less attractive mechanisms to foster goal alignment, such as monitoring.’ A theoretically similar argument has been made regarding voluntary accountability programs in the non-profit sector, which according to Prakash and Gugerty (2010), can be viewed as mechanisms that signal to principals that resources are deployed as per the organisational mandate. As donors seek assurances that resources are spent effectively and efficiently, they can be expected to prefer to donate to non-profits who can credibly demonstrate their trustworthiness through membership of an accountability club. Van Slyke (2006) has proposed that agents that find themselves in an evolved principal-agent relationship may be incentivized to foster trust by building rapport with the principal through stronger accountability relationships, because such efforts will likely payoff in the long term. This aligns with the argument that trust-based modes of governance can to some extent alleviate agency problems and reduce the need for external monitoring (Van Thiel & Yesilkagit, 2011). Furthermore, Coremans and Kerremans (2017) have suggested that the agent may give up part of its discretion in order to avoid extreme information asymmetries that could have detrimental outcomes for the agent. They characterize such agents as “information asymmetry managers”.

A second group of approaches can broadly be categorised as *alternatives* to principal-agent theory. The common denominator in this approach is an understanding of accountability that goes beyond accountability as a control mechanism used by principals to keep agents in check. This approach can be seen as reflecting broader criticism towards the dominance of principal-agent theory in research on accountability (Dicke, 2002; O’Kelly & Dubnick, 2020; Olsen, 2013; Philp, 2009; Skelcher, 2010; Whitaker et al., 2004). One oft-used rivalling perspective of principal-agent theory is *stewardship theory* (Davis et al., 1997; Schillemans, 2013; Schillemans & Bjurström, 2020; Van Slyke, 2006; Van Thiel & Smullen, 2021). This perspective stresses that accountability can be mutually beneficial for the actor and the principal in their pursuit of shared goals. The goal conflict assumption is weakened or completely eliminated in this approach and it is assumed that the initial disposition of the principal and the agent is to trust each other, opening up possibilities for ‘bounded self-regulation’ (Schillemans, 2013; see also Magill, 2009, on this topic from a principal-agent theory perspective). As noted by Schillemans (2013, p. 557), stewardship theory presupposes that ‘agencies understand the relevance of external concerns and are given the opportunity to translate them into appropriate internal measures and regulations.’ Schillemans

and Busuioc (2015) take an even broader view on the possible functions of accountability. They argue that account-giving may serve to ensure good performance through organisational learning, build trust, credibility, and help to acquire a “license to operate” and expand one’s autonomy (Schillemans & Busuioc, 2015). This is in line with research that has shown that self-initiated accountability procedures can enhance the credibility and autonomy of agencies (Jabko, 2003; Schillemans, 2012). What is more, Karsten (2015) has demonstrated on the basis of a study among political executive leaders that accountability can – in contrast to the assumptions of principal-agent theory – be beneficial to the account-giver, for instance in terms of creating support, overcoming opposition, avoiding negative sanctions and satisfying psychological needs. Others have pointed at learning as a rationale for engaging in voluntary accountability (Arras & Braun, 2018; Schillemans, 2011).

Drawing on bureaucratic reputation scholarship, Busuioc and Lodge (2016, 2017) develop a reputational theory of public accountability, which advances reputational and legitimacy considerations as an important potential driver behind observed patterns of voluntary account-giving. They argue that accountability processes should be regarded as events in which reputations (of both account-holders and account-givers) are shaped. In the words of Busuioc and Lodge (2016, p. 248), accountability is ‘not about reducing information asymmetries, moral duties, containing agency losses, or ensuring that agents stay committed to the original terms of their mandate. Instead, accountability—in terms of both holding and giving—is about sustaining one’s own reputation vis-à-vis different audiences.’ Agencies do not necessarily stand to lose from account-giving, as it provides them with an opportunity to showcase successes, manage reputational risks as well as track and manage audience expectations (Busuioc & Lodge, 2017). Especially since voluntary accountability essentially happens on the agency’s own terms, it is a way to maximally reap the reputational benefits of accountability (Busuioc & Lodge, 2016). Seen in this light, voluntary accountability is sensible organisational behaviour. However, there has been very little empirical research validating such considerations as a driver of voluntary accountability among agencies.

1.2 A REPUTATIONAL PERSPECTIVE ON VOLUNTARY ACCOUNTABILITY

This dissertation follows Busuioc and Lodge (2016, 2017) and adopts a reputational perspective to study voluntary accountability as it provides a compelling account of accountability-seeking behaviour. This perspective is grounded in *bureaucratic reputation theory*, which has in recent times rapidly gained much influence in public administration research. Its theoretical foundations can be traced back to the work of Erving Goffman (1959) and his dramaturgical approach (Busuioc & Lodge, 2016, 2017; Carpenter, 2010b; Carpenter & Krause, 2012, p. 28), but it has really gotten traction since Daniel Carpenter’s seminal work on the reputation of US regulators (Carpenter, 2000, 2001, 2010a, 2010b; Carpenter & Krause, 2012). Since then, a significant literature has spawned that has started to investigate a wide variety of phenomena in the public sector from a reputational perspective. Researchers have looked at how reputation relates to and affects,

among others, regulatory communications (Busuioc & Rimkutė, 2020a; Maor, 2020; Maor et al., 2013; Müller & Braun, 2021; Rimkutė, 2020a, 2020b), the governance of innovation (Fahy et al., 2021; Maor, 2010), blame-avoidance (Gilad et al., 2015), agencies' scientific outputs and decisions (Maor & Sulitzeanu-Kenan, 2013, 2016; Rimkutė, 2018), inter-organisational cooperation (Busuioc, 2016), participatory and consultation procedures (Moffitt, 2014; Potter, 2019), regulators' relationships with interest groups (Braun & Busuioc, 2020; Carpenter, 2014), accountability (Busuioc & Lodge, 2016, 2017; Doering et al., 2021) and signalling (van der Veer, 2021). In addition, researchers have tried to develop new ways to empirically measure bureaucratic reputation (Bellodi, 2022; Lee & Van Ryzin, 2019; Overman, Busuioc, et al., 2020).

1

The thrust of this literature is the idea that public sector organisations attempt to cultivate their bureaucratic reputation among audiences that matter – that is, audiences whose beliefs and support are crucial to the organisation. Bureaucratic reputation refers to ‘a set of beliefs about an organization’s capacities, intentions, history, and mission that are embedded in a network of multiple audiences’ (Carpenter, 2010b, p. 33). A good reputation is seen as an indispensable and valued organisational asset, which may, for instance, bolster one’s autonomy from political principals and help to shield the organisation against external attacks and criticism. The concept of audiences, defined as ‘any individual or collective that observes a regulatory organization and can judge it’ (Carpenter, 2010b, p. 33), is the ‘central concept’ in reputation-based perspectives. Audiences are important in two ways. First, audiences can weaken or empower an agency by either giving or withholding their support. Second, agencies, both consciously and unconsciously, adapt their behaviour and rhetoric to their audiences. It is for these two reasons that Carpenter (2010a, p. 832, emphasis in original) stated, ‘when trying to account for a regulator’s behavior, *look at the audience, and look at the threats.*’

The reputational perspective intuitively makes sense of accountability behaviour that is seemingly counterintuitive from the perspective of principal-agent theory. Seen as a reputational opportunity, it can be rational for agencies to want more accountability – at least in so far as it helps to protect or enhance their reputation. The reputational perspective therefore has the potential to transcend noted limitations of principal-agent theory with regards to explaining observed patterns of voluntary account-giving in the public sector. Although there is some level of contestation in the literature about whether approaches grounded in principal-agent theory and bureaucratic reputation theory respectively should be seen as complementary or competing (Brandsma & Adriaensen, 2017; Busuioc & Lodge, 2016, 2017; Carpenter & Krause, 2015; Krause & Douglas, 2005; Maggetti & Papadopoulos, 2018), these theoretical perspectives involve clearly distinguishable underlying principles regarding what drives agency behaviour. Importantly, the principles underlying the reputational perspective are comparatively better suited for elucidating the drivers of voluntary accountability. Two fundamental differences are important to note in light of the focus of this dissertation.

First, whereas principal-agent theory provides a *contract*-based description of the relationship between agent and principal, ‘there are no contracts, and there cannot be’ (Carpenter, 2010b,

p. 60) in the politics of reputation. Preferences can be laid down in contracts and compliance with these preferences can be monitored through accountability mechanisms, but reputation is inherently unspecific and ambiguous as it cannot be directly measured, monetarized or split up (Carpenter, 2010b, p. 60). This relates to diverging assumptions regarding what is most important in bureaucratic life. In principal-agent theory, *information* is the most important currency sought and fought over. Through the accumulation of expertise over time, an agency will become more expert about its tasks and policy responsibilities than its principals. This informational advantage makes it possible for the agency to pursue its own interests – in defiance of principal preferences. By contrast, bureaucratic reputation theory posits that public agencies value *reputation* above all else (Carpenter, 2001, 2010b). An agency will give up private information if this is needed to protect or enhance its reputation. As noted by Brandsma and Adriaensen (2017, p. 45), ‘[r]eplacing preferences by reputation turns the principal-agent model upside down.’ To put it simply, a reputational perspective entails that reputational incentives take precedence over formal institutions in steering agency behaviour (Krause & Douglas, 2005).

Second, the two perspectives also diverge on who is seen as providing authority to agencies. In principal-agent theory, the principal, by nature of its formal position, has the ability to grant or withdraw authority and to determine the rules of the game with which the agent needs to comply. By contrast, a reputational perspective entails that authority is ‘defined by both the principal and agent through the exercise of both formal and informal mechanisms, and often shaped by third parties or external audiences’ (Carpenter & Krause, 2015, p. 8). By cultivating a reputation for producing particular policies or services, agencies build enduring authority in governance (Bertelli & Busuioc, 2021). The key concept in this regard is that of audiences. In principal-agent theory, the parameters and limits of agency actions are unilaterally defined through legal provisions imposed by the principal. By contrast, bureaucratic reputation theory posits that the room for agency actions is conditional on the beliefs of both audiences who formally wield power over an agency (i.e., principals), as well as those who do not.

Adopting a reputational perspective has two important implications for the study of voluntary accountability. *First of all*, it puts reputational incentives at the heart of explanatory mechanisms of accountability-seeking behaviour. If one accepts the argument that accountability is about reputation, it naturally follows that variation in voluntary accountability should be related to differences in reputational benefits for the account-giver. Agencies will engage in voluntary accountability to the extent that they have reputational incentives to do so. The reputational literature has identified many, mostly informal, dynamics that shape reputational incentives. Based on this literature, various reputation-based explanations of voluntary accountability can be identified, which profoundly differ from those grounded in principal-agent theory. From a reputational perspective, voluntary account-giving may for instance be used as a defensive mechanism in the face of reputational threats such as media controversies and negative public allegations. It may also function as an instrument for ensuring attention from negligent, “drifting” principals whose support is essential for securing resources and overall survival. Voluntary account-giving may furthermore be a solution for highly independent agencies who wish to take

proactive (symbolic) actions in response to criticism regarding their thin democratic base (Alon-Barkat & Gilad, 2016). These types of reputation-based explanations are further explored and tested in this dissertation.

The *second* implication of adopting a reputational perspective is that it broadens the perspective on who are relevant actors in the accountability game and how their roles are conceptualized. In principal-agent theory, societal actors are seen as stakeholders who can trigger a “fire alarm” (McCubbins & Schwartz, 1984). By contrast, a reputational perspective conceptualizes such actors as audiences. Voluntary account-giving to non-principals then is not about some sort of “shadow of hierarchy” looming in the background, but about account-giving to reputationally powerful audiences who are relevant account-holders in their own right. Importantly, the concept of audiences provides a starting point for unpacking the role of the forum – i.e., to whom account is given – in voluntary accountability. Previous research has shown that voluntary accountability is primarily of the horizontal type (Bovens, 2007; Koop, 2014; Schillemans, 2008; Verschuere et al., 2006), meaning that it is rendered to forums on an equal footing (who are *not* principals), although some studies have found that voluntary accountability is sometimes also initiated *upwards*, towards new or existing ‘principals’ (Busuioc, 2013; Jabko, 2003). Variation in the reputational importance of audiences may be an important determinant of whom agencies target with voluntary accounts (and relatedly, how account is rendered). What agencies can expect to gain from accountability in reputational terms to a large extent depends on who is at the other end of the accountability relationship. A reputational perspective fits naturally with a multi-audience approach (Boon et al., 2020). Hence, it takes into account the diversity of *relationships* in which voluntary account-giving occurs and helps us to move beyond treating voluntary accountability as a uniform concept.

The comparison above focuses exclusively on bureaucratic reputation theory and principal-agent theory. Although these theoretical perspectives are nowadays highly influential in the literature on public accountability, there are of course other theoretical perspectives that could be applied to study accountability-seeking behaviour. It is for instance worth mentioning how a sociological institutionalist perspective (DiMaggio & Powell, 1983; Meyer & Rowan, 1977) fits in the comparison made above, especially with regards to versions of sociological institutionalism that emphasize that actors can actively and strategically respond to institutional pressures in order to gain, maintain and repair organisational legitimacy (Oliver, 1991; Suchman, 1995). Similar to sociological institutionalism, bureaucratic reputation theory is principally concerned with legitimacy. Ultimately, sustaining a good reputation is about securing legitimacy. As noted by Rimkutė (2018, p. 72), legitimacy is ‘a product of successful reputation management by selectively responding to various reputational threats’ exercised by different, and often conflicting, audiences (Rimkutė, 2020b, p. 1641). The unique theoretical feature of the reputational perspective relates to the emphasis on audiences. Referring among others to the literature on sociological institutionalism, Busuioc and Rimkutė (2020b, p. 1258) write that ‘the reputational account has a distinct focus compared to this literature, i.e., it pays particular attention to public organisations’ audiences.’ Whereas a sociological institutionalist view on voluntary accountability would lead to a focus

on *institutional norms* prescribing accountability as an important rule of appropriate behaviour in the public sector (Koop, 2014), adopting a reputational perspective by contrast stresses that sustaining legitimacy requires broad support from a cross-cutting network of *audiences* (Carpenter, 2001). Rather than being a (strategic) response to shifts in institutional norms regarding accountability, the reputational perspective suggests that voluntary account-giving serves to establish or cultivate reputationally beneficial relationships with particular audiences whose support helps to secure organisational legitimacy.

1.3 MISSING AREAS IN RESEARCH ON VOLUNTARY ACCOUNTABILITY

As indicated above, previous studies have identified different possible drivers of voluntary accountability – both falling within the principal-agent theory tradition and through alternative theoretical approaches. This has provided us with ideas about what possibly drives the adoption of voluntary accountability practices. Despite these valuable contributions to the field, important research gaps remain.

First, the phenomenon of voluntary accountability is often *difficult to pinpoint conceptually*. No consensus has emerged regarding which practices fall under the concept of voluntary accountability and which ones fall short of the accountability threshold. This conceptual ambiguity hinders comparisons between empirical studies and limits our ability to critically assess the extent to which voluntary accountability can fulfil its promise. Unfortunately, the concept of voluntary accountability seems to have inherited the ‘chameleon-like’ (Sinclair, 1995) qualities from the higher-level concept of accountability. A wide variety of practices – occurring in quite different relationships – is discussed under the rubric of voluntary accountability or related concepts. While there is certainly merit in mapping new accountability practices propelled by changes in the public sector (e.g., the emergence of new information and communication technologies, horizontalization, agencification, mediatization), it is problematic that this seems to go hand in hand with ever-expanding conceptual boundaries of accountability (Mulgan, 2000) and a stream of loosely connected new accountability concepts. *In extremis*, this could jeopardise what has been gained by recent literature agreement about the definition of accountability (Bovens et al., 2014). Most of the practices labelled as voluntary accountability or a related concept appear unrelated at first sight and it is often difficult to connect these practices to established accountability frameworks. In other words, a solid conceptual basis is lacking to examine voluntary accountability systematically.

Second, research on voluntary accountability tends to be *actor-centric*,¹ meaning that it looks mostly at actors to understand what drives voluntary accountability. Key studies in the field have specifically sought to ascertain whether actors’ motivations behind accountability-seeking behaviour are consistent with either a logic of appropriateness or a logic of consequences (Karsten,

1 This tendency can be found in the broader accountability literature (Benoit, 2021; Schillemans & Busuioc, 2015), although recent research has shifted the focus to forums (Benjamin & Posner, 2018; Döhler, 2016; Maggetti & Papadopoulos, 2018; Tidå, 2022).

2015; Koop, 2014), irrespective of the account-holder involved. This seems logical, because after all voluntary accountability is self-imposed; it originates from within the agency. Nevertheless, it ignores that accountability is, fundamentally, a *relational concept* (Black, 2008; Bovens, 2007). In principle, public agencies can render voluntary accounts to every audience in their environment or to all of them collectively. Importantly, voluntary accountability looks quite different depending on who is the account-holder. For example, voluntary account-giving to the general public generally takes a different form than voluntary accountability to expert stakeholders. Whereas the former would be possible by using for instance social media or making appearances in the media, the latter would require for instance setting up a consultative forum. This is to say that because of the actor-centric approach taken in previous studies, the role of the forum in voluntary accountability has not yet been fully unpacked.

Third, existing research has focussed on different types of *organisations*, covering a wide variety of voluntary accountability *practices*. Among others, research has focused on voluntary account-giving by non-profit organisations (Becker, 2018; Gugerty, 2009; Tremblay-Boire et al., 2016; Williamson et al., 2018), municipalities (Doering et al., 2021; Karsten, 2015) and public agencies (Arras & Braun, 2018; Busuioc & Jevnaker, 2022; Koop, 2014; Laegreid & Rykkja, 2022; Magill, 2009; Reiss, 2011; Schillemans, 2011; Wood, 2018). Even within the subset of studies focussed on public agencies, there is remarkably large variation in the voluntary accountability practices studied. It is difficult to draw generalizable conclusions because of this.

1.4 RESEARCH QUESTIONS

This dissertation aims to fill these research gaps in order to advance our understanding of the drivers of voluntary accountability in the public sector. The central research question in this dissertation is: *What drives public agencies' propensity to engage in more extensive practices and/or to initiate more far-reaching mechanisms of accountability than those mandated by law? In other words, what are the drivers of voluntary accountability?* This dissertation explicitly sets out to verify to which extent *reputational considerations* act as a driver of accountability-seeking behaviour, as these considerations have remained largely untested yet potentially play a dominant role in driving voluntary accountability. Alongside this focus on reputational considerations, this dissertation also investigates alternative explanations of accountability-seeking behaviour, especially those that have been proposed and/or documented by previous studies.

The main research question is broken down into four sub-questions, which are at different levels of specification. Each sub-question delves deeper: From laying out the conceptual and analytical groundwork, to investigating multiple drivers, to zooming in on a specific driving logic and next a specific voluntary accountability practice. The first sub-question is: *How can voluntary accountability be understood conceptually and analysed?* Addressing this descriptive sub-question is of utmost importance given the conceptual confusion surrounding the concept. This sub-question will be addressed in chapter two through the development of a conceptual framework of voluntary accountability, which provides the analytical basis for the subsequent chapters. The

proposed framework highlights the crucial role played by *account-holders*, both for discerning conceptually between voluntary accountability and related concepts such as transparency and openness and for understanding the drivers of voluntary accountability. Chapter two has been published as an article (de Boer, 2021).

Chapter three provides the first empirical insights and targets a core question as to the drivers of voluntary account-giving: *To what extent do the mechanisms advanced in the literature (or others still) spur organisational accountability-seeking behaviour towards different types of audiences?* This sub-question is explanatory in nature and is addressed through a qualitative analysis of interview data and answers to open-ended survey questions. Answering this sub-question results in a comprehensive mapping of motivations driving accountability-seeking behaviour, as well as first evidence of the adequacy of the conceptual framework presented in chapter two. As to the latter aspect, the results confirm the main proposition from chapter two that there is a “motivation-audience link”. The type of audience to whom the voluntary account is rendered is a key explanatory factor as to which driving mechanism prevails. Chapter three has been published as an article (de Boer, 2022).

Chapter four zooms in more explicitly on reputational considerations. Relying on a quantitative research design, it asks the following sub-question: *To what extent do reputation-informed mechanisms explain variation in accountability-seeking behaviour?* This sub-question moves the empirical analysis into the area of theory-testing. Formal expectations are strongly grounded in reputation literature but are also based on the findings derived from the qualitative data used to answer the previous sub-question. The results offer support for the relevance of reputational considerations as a driver of voluntary accountability, albeit – consistent with the findings regarding the other sub-questions – drivers vary substantially depending on the audience to whom account is rendered. A version of chapter four is currently under review (revised and resubmitted).

Chapter five is also concerned with testing the drivers of voluntary accountability, but this time the focus is on a specific voluntary accountability practice: social media. The following sub-question is addressed in this chapter: *What explains variation in agency communication on social media and to what extent does the use of social media serve to promote accountability?* Zooming in on social media moves the dissertation closer to concrete, yet impactful practices of voluntary account-giving (Bertot et al., 2012; Brummel, 2022; de Graaf & Meijer, 2019). Social media is often regarded as a prime example of voluntary accountability and high expectations have been raised regarding its potential to empower citizens vis-à-vis government and to democratize the public sector. Addressing this sub-question serves two purposes. It results first of all in an assessment of the extent to which the use of social media meets the accountability threshold and therefore can be understood as an accountability practice. Secondly, it contributes to a better understanding of the factors affecting the use of social media by public agencies. A version of chapter five is currently under review (revise and resubmit).

1.5 RESEARCH DESIGN: CASE SELECTION, METHODS AND DATA

While the theoretical argument put forward in this dissertation is, in principle, generalizable to multiple governance settings across economically developed democracies, the empirical focus of this dissertation is on the specific setting of EU agencies. The EU is a particularly interesting and relevant polity for studying voluntary accountability given its growing relevance as a centre of power and continued legitimacy challenges. The EU plays a pivotal role in the governance of many policy fields, including among others banking and financing, innovation, public health, energy, security, environment, immigration and transport. An important part of the authority that has been transferred from the Member States to the EU institutions is subsequently further delegated to EU agencies (Busuioc, 2013; Curtin, 2005; Dehousse, 2008; Kelemen & Tarrant, 2011). These agencies execute a diverse set of tasks, ranging from seemingly mundane and uncontroversial ones such as information collection to highly consequential ones (e.g., advising on the market authorisation of medicines or the supervision of financial institutions). EU agencies take up a bulk of the bureaucratic work in the EU. As such, they have been characterised as ‘a vital part of the EU’s regulatory and executive capacity’ (Rimkutė, 2021, p. 204). EU agencification is *not* a phenomenon of the past but a continuing process. New EU agencies are currently in the making and the mandates of existing ones are being extended and improved to address pressing cross-border policy problems such as pandemics, climate change and the influx of migrants. For instance, in the wake of the COVID-19 crisis, the Member States and the EU institutions agreed to give further powers to the EMA and the European Centre for Disease Prevention and Control (ECDC), with the objective of improving the EU’s emergency preparedness for, and crisis response to, cross-border threats to human health (Rimkutė & Mazepus, in press). Hence, the actions and decisions of EU agencies, both directly and indirectly, in the present and presumably even more so in the future, affect societies and their citizens.

An important question from a democratic perspective is how to hold these agencies effectively accountable (Busuioc, 2013; Curtin, 2007; Egeberg & Trondal, 2017; Leidorf-Tidå & de Boer, 2022; Lord, 2011; Vos, 2005). This is fundamentally a question about democracy and legitimacy (Bovens et al., 2010; Busuioc, 2013; Majone, 1999). Although EU agencies’ accountability regime has over time been strengthened through the introduction of more and stronger accountability mechanisms (Bovens & Wille, 2020; Harlow & Rawlings, 2007; Tidå, 2022; Wille, 2016), EU agencies are still – on par with the EU more generally – often seen as suffering from a democratic deficit. Important causes are EU agencies’ non-majoritarian status, their near absence from public discourse due to weak visibility and the underdevelopment of checks and balances at the EU level (Curtin, 2007; Howell, 2019; Papadopoulos, 2010). Such criticisms are largely based on assessments of formal accountability obligations, often without incorporating the ways in which EU agencies may go above and beyond these obligations. For EU agencies, voluntary accountability may be a valuable mechanism through which they can strengthen their own accountability and gain legitimacy (Schmidt, 2019). In fact, several studies have documented that EU agencies have adopted a variety of voluntary accountability practices (Arras & Braun, 2018; Busuioc, 2013; Busuioc & Jevnaker, 2022; Piquet, 2021; Wood, 2018). While these studies have suggested possible

mechanisms that may explain the adoption of these practices, no agreement has been reached about which mechanisms prevail and/or under which conditions. By focussing on EU agencies, this dissertation taps into and builds on the valuable work that has been done on EU agencies' accountability-seeking behaviour and takes the next step by seeking to explain variation therein (vis-à-vis different audiences).

As per the research design, a mixed methods approach is employed. This type of research design is advantageous as it helps to transcend the limitations of any particular method and it is often promoted for this reason (Gilad, 2021). For instance, Yang (2014, p. 174) has argued that accountability researchers should 'use mixed methods if possible.' Specifically, a development strategy (Gilad, 2021) is followed. Qualitative methods are employed to refine concepts, theory and measurements, which are subsequently tested through quantitative methods in later stages of the research. The empirical part of the dissertation starts out with an analysis of qualitative interview data. This data was collected through interviews with top-level managers working at EU agencies. This interview data helped to refine core concepts, to get insights into EU agency top-level managers' understanding of voluntary accountability, to get an overview of the voluntary accountability practices adopted by EU agencies and to map EU agencies' motivations to seek accountability. The interview data also provided the first empirical insights in the adequacy of the conceptual framework that was developed before going into the field, as well as a confirmation of the importance of reputational considerations as a driver of voluntary accountability. Deductive theory-testing was done in the next stage. A first test was conducted based on survey data, which was collected in parallel with the interview data. The survey data has some drawbacks as it is perceptual, cross-sectional in nature and consisting of a rather limited number of observations. A second test was devised to mitigate these drawbacks, focussing specifically on an accountability practice of which the relevance became apparent during the interviews: social media. Social media data was collected to construct a longitudinal dataset. This allows for a more forceful (causal) test of the drivers of voluntary accountability – in the specific context of social media.

1.6 SCIENTIFIC CONTRIBUTION

This dissertation contributes to the scientific literatures on accountability, bureaucratic reputation, EU agencies and regulatory governance. First, this dissertation (re)conceptualizes voluntary accountability in order to clarify the meaning of the concept and specify its conceptual boundaries. To start, consistent with the relational understanding of accountability, voluntary accountability is defined as *a relationship between an actor and an engaged forum, in which the actor voluntarily commits itself to offering information on, and explanation of, its conduct and may face consequences*. Defining the concept in explicit relational terms helps to increase the consistency between conceptualisations of voluntary accountability and dominant accountability frameworks. At the same time, it also provides a much-needed re-narrowing of the conceptual boundaries and well-defined criteria for discerning between voluntary accountability and related concepts. Specifically, this dissertation stresses that *forum engagement* – i.e., a party that assesses the actor's account and considers sanctions or rewards – is an essential prerequisite for a practice

to qualify as voluntary accountability. Not taking forum engagement into account may lead us to over-diagnose the incidence of voluntary accountability, possibly giving us a somewhat false sense of security as to the state of accountability in modern governance. This dissertation also highlights that the absence of any formal provisions – which is the defining element of voluntary accountability – implies no stipulation of *how* account is to be given. Accountability-seekers can therefore choose freely from a menu of different accountability instruments. The choice of accountability instrument is also closely interlinked with *to whom* account is rendered. Rather than asking why an agency seeks accountability, the more revealing question then becomes why an agency chooses to adopt a specific accountability practice, directed at a particular audience. It is a prime contribution of this dissertation that reframing the question in this way leads to important insights into accountability-seeking behaviour. The audience is identified in this dissertation – first conceptually and later empirically – as a key factor that helps to unpack and make sense of the multiplicity of mechanisms driving voluntary accountability.

Second, the dissertation contributes to further *theorizing* the role of bureaucratic reputation as a determining factor of accountability behaviour in the European regulatory state. While principal-agent theory is frequently employed to study relations between actors in the EU (e.g., Delreux & Adriaensen, 2017; Kassim & Menon, 2003), including EU agencies' accountability relationships (Curtin, 2005; Dehousse, 2008), the analytical value of this perspective in the context of the EU is increasingly contested. Chains of delegation are often not clear-cut in the EU and accountability relationships are typically less stable, more complex and more intertwined compared to those found in parliamentary democracies at the national level. These relations are therefore difficult to model as unitary chains (Curtin, 2007; Olsen, 2013; Skelcher, 2010). Bureaucratic reputation theory has been proposed as promising alternative lens that can provide important insights for the EU regulatory state, the evolution of EU agencies and their efforts at legitimation (Busuioc & Rimkutė, 2020b). Building on this literature, this dissertation formulates a reputational understanding of EU agencies' accountability-seeking behaviour. Rather than portraying EU agencies as victims of mounting accountability pressures, we need to see EU agencies as “accountability entrepreneurs” driven by reputational considerations. Specifically, this dissertation on the one hand draws attention to the unregulated and informal ways in which EU agencies render account to a variety of audiences in an attempt to further their own legitimacy. At the other hand, it also highlights how accountability might be a strategic instrument in hands of EU agencies for self-promotion, mitigating public criticism and defying principal-control.

This dissertation also contributes to the literature by deductively *testing* proposed explanations of voluntary accountability. This is valuable as the accountability literature is still relatively ‘impressionistic and event-driven’ (Bovens et al., 2008, p. 225), with Brandsma (2014, p. 156) noting that ‘there is still hardly anything we know about factors that influence emergent degrees of accountability, and yet plenty of theories have been introduced and are well-developed enough to be put to the test in real-life settings.’ Doing this for *voluntary* accountability is highly relevant. Studying the drivers of voluntary accountability can help us understand what makes agencies ‘tick’ (Magill, 2009, p. 900) because it can reveal the reasons that agencies take voluntary

actions in the absence of external formal requirements. As such, it gives important insights into the incentives that motivate agency behaviour. This, in turn, can inform us on how to design administrative systems in which agencies are incentivized to organize their own accountability proactively when traditional accountability functions may be either impossible or inadequate.

1.7 SOCIETAL RELEVANCE

Understanding voluntary account-giving by public agencies, as part of their overall accountability, is also important for society. Accountability has been proposed as a solution to a wide range of public sector problems (Dubnick, 2005; Mashaw, 2006) and this is no different for voluntary accountability. One might argue that voluntary accountability is a “diamond” concept – even better than the “golden” concept of accountability (Bovens et al., 2008, p. 226), as it has all desirable traits of the accountability concept, but perhaps fits more naturally with now dominant modes of governance based on shared responsibilities and collaboration (Osborne, 2006). It has for instance, been suggested that voluntary account-giving might be a way forward for balancing output legitimacy – which has traditionally been the main source of legitimacy for EU agencies (Busuioc & Rimkutė, 2020b; Majone, 1999) – with throughput legitimacy (Schmidt, 2019; Sosay, 2006). It is often promoted for this reason. In the words of Maarten Hajer (2012), writing about his experience as a former director of a Dutch independent regulatory agency: ‘Sticking to pure science is not a preferred model but a political choice, given its consequences. There is serious evidence that this line of action is promoted precisely for these purposes. Obviously, this domain of boundary work [between science and practice] is a risky zone of action. It would be totally irresponsible without a keen eye for the ethical and moral dimensions and a commitment to openness and accountability’ (p. 462).

Others however, have pointed at the limitations, or even disadvantages, of voluntary accountability. It may, somewhat paradoxically, undermine important public values as it may be done for self-serving purposes such as preventing the implementation of stricter accountability provisions (Koop, 2014). What is more, especially when geared towards societal stakeholders, voluntary account-giving is a potential source of de-legitimation (Braun & Busuioc, 2020). Accountability initiatives targeted at a narrow group of stakeholders may, for instance, lead to preferential treatment of certain interests and therefore pose the risk of capture and bias (Arras & Braun, 2018; Busuioc & Jevnaker, 2022). The adoption of voluntary accountability practices may furthermore open up public authorities to accountability claims from unrepresentative or even undemocratic voices (Ojala et al., 2019; Papadopoulos, 2010). Others have also argued that voluntary accountability can be burdensome for agencies and may therefore contribute to “accountability overloads” in the public sector (Bovens et al., 2008; Koop, 2014).

The jury is thus still out regarding the overall valuation of rise of voluntary accountability in the public sector. Contributing to this discussion, this dissertation specifically flags that voluntary accountability may be an unreliable instrument because it cannot be enforced externally. As Koop (2014, p. 565, emphasis in original) writes, ‘[a]s voluntary commitments to accountability

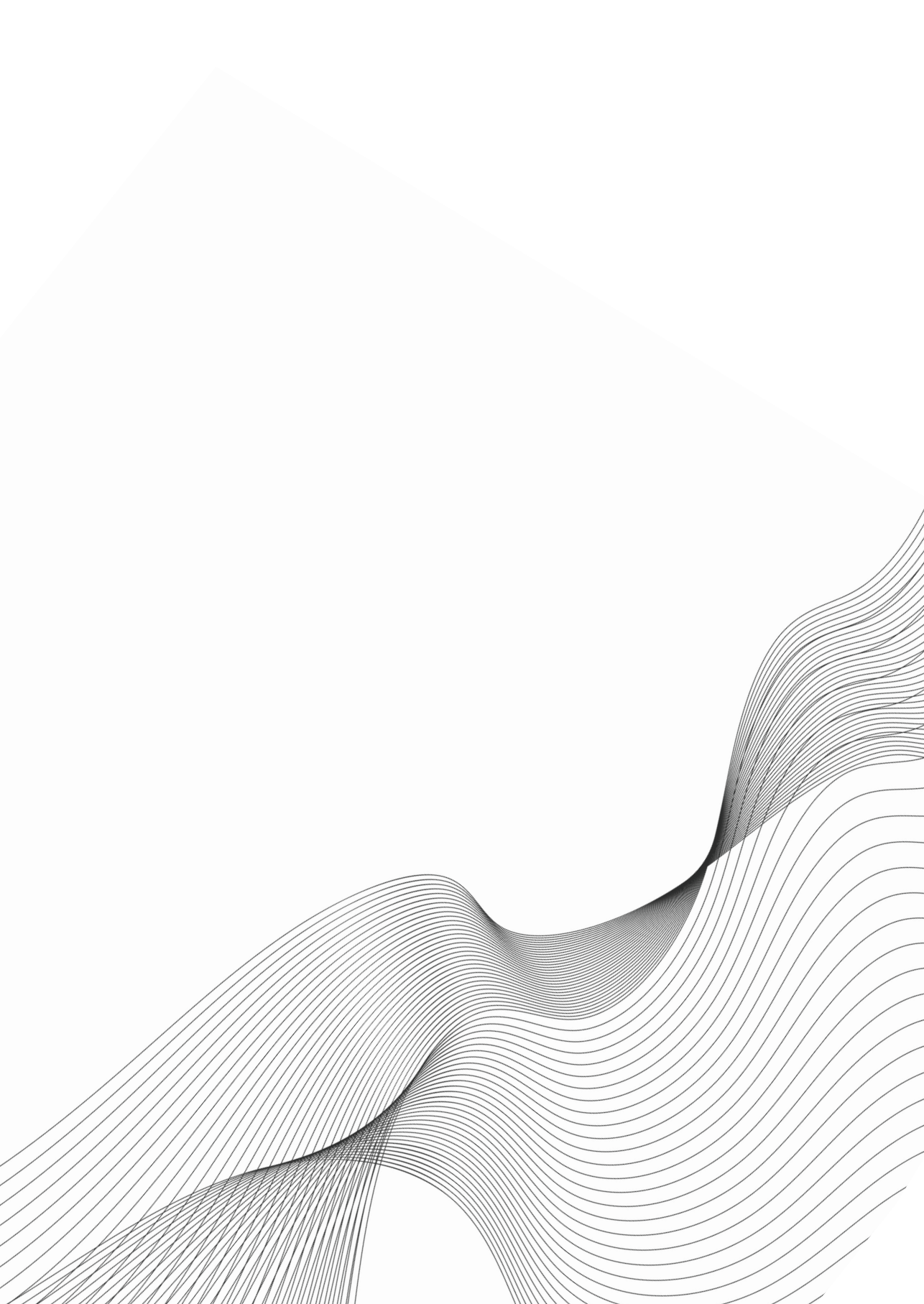
can be adopted as well as abandoned by organizations, they are less coercive than provisions for *mandatory accountability* – that is, accountability requirements which are imposed on actors by law.’ In this respect, this dissertation questions the impact of voluntary accountability practices. Specifically, it draws attention to the *symbolic* use of voluntary accountability for self-serving organisational purposes. It is therefore important to consider in any specific case whether voluntary accountability is substantive or simply a form of “window-dressing”. In case of the latter, voluntary account-giving may help agencies to “appear” accountable but not necessarily have the positive outcomes that are typically associated with accountability (Alon-Barkat, 2020). In line with this, chapter five of this dissertation for instance demonstrates that EU agencies provide less information on social media when the expected reputational consequences become more negative. This suggests that EU agencies are not fully committed to account-giving on social media – only to the extent that negative reputational consequences can be avoided. Taking such strategic considerations into account provides us with a more nuanced picture of the extent to which voluntary accountability can serve as a remedy against accountability deficits in modern governance.

1.8 OUTLINE OF DISSERTATION

The next four chapters unpack the research puzzle presented in this introductory chapter. Chapter two presents a conceptual framework of voluntary accountability, which has the central objective of remedying the conceptual confusion that surrounds the concept of voluntary accountability. Chapter three investigates based on qualitative data when the mechanisms underlying voluntary accountability identified by previous research prevail. Whereas chapter three provides a comprehensive mapping of different explanatory mechanisms and links them to audiences, chapter four focusses more explicitly on the explanatory power of reputational mechanisms as a driver of voluntary accountability. Chapter five zooms in on accountability through social media which is a prime example of voluntary account-giving to general audiences. Table 1.1 provides an overview of the four main chapters of the dissertation, including details about the publication status of each chapter. Chapter six summarizes the results from this dissertation and provides an answer to the overarching research question. The theoretical and methodological implications of the dissertation are also discussed in chapter six, as well as the limitations of the research and the recommendations for further research.

■ Table 1.1: Overview of main chapters

Chapter	Research question	Methodology	Data collection	Data analysis	Publication status
2. Conceptualizing Voluntary Accountability: A Framework	How can voluntary accountability be understood conceptually and analysed?	Conceptual	N/A	N/A	Published in <i>Public Management Review</i> (single-authored; de Boer, 2021)
3. A Multi-Audience Approach to Understanding Voluntary Accountability: The Motivation-Audience Link	To what extent do the mechanisms advanced in the literature (or others still) spur organisational accountability-seeking behaviour towards different types of audiences?	Mixed methods (largely qualitative)	Original interviews Survey data	Qualitative coding/analysis in Atlas.ti Quantitative analysis in R	Published in <i>Public Administration</i> (single-authored; de Boer, 2022)
4. A Test of Reputation-Informed Mechanisms behind Accountability-Seeking Behaviour Vis-à-vis Six Different Audiences	To what extent do explain variation in accountability-seeking behaviour?	Cross-sectional quantitative study Development of formal independence index	Original survey data Unobtrusive data Founding regulations	Ordinary least square regression in R Bayesian factor analysis in R	Under review with an international, peer-reviewed journal (<i>revised & resubmitted</i> , co-authored with Benjamin Leidorf-Tidå)
5. The Use of Social Media as an Accountability Instrument: A Promise Fulfilled?	What explains variation in agency communication on social media and to what extent does the use of social media serve to promote accountability?	Longitudinal quantitative study Machine learning	Social media data Other unobtrusive data	Generalized linear mixed models in R Sentiment analysis in Python	Under review with an international, peer-reviewed journal (<i>revise & resubmit</i> , co-authored with Madalina Busuioc and Aaron Swaving)





CHAPTER 2

Conceptualizing Voluntary Accountability: A Framework

This chapter is published as: de Boer, T. (2021). Updating public accountability: a conceptual framework of voluntary accountability. *Public Management Review*. <https://doi.org/10.1080/14719037.2021.2006973>



2.1 INTRODUCTION

Voluntary accountability is a well-established phenomenon in modern governance. A host of empirical studies document the adoption of practices by public sector organisations or public officials through which accounts are rendered in the absence of any formal obligation (Busuioc, 2013; Doering et al., 2021; Karsten, 2015; Koop, 2014; Laegreid & Rykkja, 2022; Puppis et al., 2014; Schillemans, 2011; Verschuere et al., 2006). Voluntary accountability reportedly relies on a variety of mechanisms such as self-initiated consultation procedures, social media, interactive websites, voluntary external reviews, requests for parliamentary hearings, consultative forums, codes of conduct, voluntary accountability programs and press releases/conferences.

In policy documents and political texts, such practices are recognized as instruments for rendering account too. To illustrate, the Organisation for Economic Co-operation and Development (2021) writes on its website that public communication ‘is a prerequisite for government transparency and integrity, and for the ability of citizens to hold them accountable and participate in public life.’ In a similar vein, the World Bank strives for enhanced citizen engagement because ‘[c]itizens play a critical role in advocating and helping to make public institutions more transparent, accountable and effective’ (World Bank, 2021). Similar statements have been made regarding the adoption of digital technologies. For example, Obama (2009, January 21) wrote in a memorandum addressed to the heads of executive departments and agencies that ‘[t]ransparency promotes accountability and provides information for citizens about what their Government is doing. (...) Executive departments and agencies should harness new technologies to put information about their operations and decisions online and readily available to the public.’ Nowadays, many public bodies – whether they are street-level bureaucracies, independent agencies or core government – are embracing social media and other digital technologies in the name of accountability. This suggests the existence of a whole new class of accountability practices that are largely voluntary in nature and whose resemblance to traditional accountability instruments (e.g., parliamentary hearings, formal reporting, legal procedures, financial auditing) is often difficult to grasp.

While voluntary accountability has been qualified as a ‘persistent’ (Reiss, 2011, p. 647) phenomenon, its conceptual clarity needs further unpacking. The scope of the concept has expanded beyond the traditional understanding of accountability, often conflated with related, but conceptually distinct, practices that fall short of the accountability threshold. Moreover, the phenomenon of voluntary accountability does not sit comfortably within the broader understanding of accountability. While dominant and influential conceptualizations of accountability (Bovens, 2007) note that an account-giver (“actor” in accountability terminology) can in principle render account voluntarily to an account-holder (“forum” in accountability terminology), at the same time there seems to be an inherent tension between this phenomenon and the conceptualization of accountability put forward. A central component in seminal accountability frameworks (Bovens, 2007; Mulgan, 2000; Strøm, 2000) that implicitly or explicitly draw on assumptions from principal-agent theory is the presence of an “obligation” to render account: “The most concise description of accountability would be: ‘the *obligation* to explain and justify conduct’” (Bovens, 2007, p. 450, emphasis added). Yet, this sits somewhat at odds with the notion that voluntary accountability is *self-imposed* (Koop,

2014, p. 565) and therefore, by definition, rendered in the absence of an obligation. It remains thus unclear how the concept fits in our broader understanding of public accountability.

Reconciling voluntary accountability with existing understandings of accountability is relevant, since a whole array of account-giving practices are undertaken voluntarily, in the absence of an obligation (even of the moral kind). Referring to non-majoritarian institutions, Busuioc and Lodge (2016, p. 253) note that '[s]eeking accountability (...) is an important strategy for such actors to manage reputational risks and demonstrate that account giving is being taken seriously.' Voluntary accountability has even been called 'an essential tool for active reputation management' (Doering et al., 2021, p. 376). Actors have been found to render voluntary accounts in order to build support for their policies (Moffitt, 2014) and controversial decisions (Karsten, 2015), to create mutual trust (Van Slyke, 2006), to gain autonomy and reputation (Busuioc & Lodge, 2017) and in the process may even offset principal control (Bertelli & Busuioc, 2021). Such strategic motivations behind voluntary accountability are in line with a broader literature that speaks of entrepreneurial actors who are 'proactive in managing their own legitimacy' (Black, 2008, p. 152). This literature stresses that bureaucratic actors gain power and autonomy through pro-actively engaging in and maintaining (accountability) relationships with relevant audiences (Carpenter, 2010b). Reputed organisations are able to (co-)shape the formal constraints on their authority and the terms of their formal mandate (Carpenter & Krause, 2015). This could entail that rather than improving the general state of accountability in modern governance, practices of voluntary accountability could stand to subvert it. In order to advance our understanding of such mechanisms as well as the potential positive and adverse consequences of voluntary accountability, we need to first lay more analytical ground towards an integrated conceptual framework and consensus on the meaning of the concept.

This chapter therefore sets out to update existing accountability frameworks by developing a conceptual framework of voluntary accountability. The proposed framework stays close to Bovens' influential accountability framework (2007), while at the same time drawing attention to some elements that need recalibration in order to incorporate the phenomenon of voluntary accountability. In this sense, our framework – in light of recent empirical developments – "updates" existing accountability frameworks. Specifically, we identify *four aspects* that function differently when accountability is voluntary in nature: *why* the account is rendered, *why* actors are held accountable, *how* and *to whom* account is rendered. In structuring the account along these elements, we mirror Bovens' work on accountability to ensure adequate embedding and synergies between the two conceptualizations, while simultaneously adapting it to the specific demands of voluntary accountability. As will be argued in this chapter, these adjustments are necessary because voluntary accountability, unlike mandated accountability, is not settled formally. In contrast to its mandatory counterpart, in the case of voluntary accountability, the relationship between the actor and the forum is *not* the product of a formal stipulation by an external authority (e.g., the legislator) imposing a duty to give account but instead emerges unforced through mutual acquiesce and engagement from both sides. It is argued here that recognition of this *distinctive aspect of voluntary accountability* is important for obtaining a shared conceptual understanding, for unpacking the underlying mechanisms behind the phenomenon, and for reflecting critically upon its normative implications.

A conceptual framework of voluntary accountability in the public sector is thus direly needed. The rationale for this is three-fold. *First*, seemingly unrelated phenomena, ranging from maintaining a website to voluntary accountability programs with formal sanctions, have been classified as voluntary accountability or one of the many related concepts that mean approximately the same thing such as social accountability, horizontal accountability, direct accountability and stakeholder accountability. The chapter hopes to help mitigate the existing conceptual confusion around the topic by establishing when a practice qualifies as voluntary accountability through a clear-cut definition and to contribute to greater consistency in how the concept is applied. It furthermore provides a systematic instrument for assessing political or bureaucratic claims, such as the ones mentioned above, that the adoption of a certain practice promotes accountability.

Secondly, the proposed framework completes the conceptual structure of accountability (Sartori, 1970) because every possible form of accountability is either mandatory or voluntary. While most studies examine mandatory accountability mechanisms, *de facto* account-giving does often not occur because of formal obligations (Romzek et al., 2012; Scott, 2006). Thus, by situating voluntary accountability within our broader conceptual understanding of accountability, we can get a more complete picture of the state of accountability in modern governance. This can, in turn, help us to make better assessments of the potential advantages (e.g., remedying democratic deficits, enhancing organisational learning, ensuring balance of powers) and disadvantages (e.g., overloads, incompatible accountabilities, bias) of accountability in its full picture.

Third, we present a novel research agenda that highlights the implications – both theoretically and normatively – of the proposed framework. This agenda focusses on the varying rationales behind voluntary account-giving, the logic behind decisions regarding how and to whom account is rendered and the consequences of voluntary accountability for democracy. This opens up new pathways for empirical investigations that will help us better understand the drivers and the implications of voluntary accountability.

2.2 THE CHALLENGE OF ACCOUNTABILITY IN MODERN GOVERNANCE

Traditionally, accountability has been conceptualized as a hierarchical chain that runs opposite to the chain of delegation. Citizens are the ultimate principals who ‘have transferred their sovereignty to popular representatives, who, in turn, have transferred the drafting and enforcement of laws and policy to the government. The ministers subsequently entrust the execution of their tasks to the many thousands of public servants at the ministries, who proceed to delegate part of their tasks to more or less independent bodies and institutions’ (Bovens, 2007, p. 463; see also Strøm, 2000). Implementing organisations are contractually and/or statutorily obliged to inform civil servants on their performance regarding the delegated task. Public servants are, in turn, accountable to the minister by means of hierarchy within the ministry and the minister is accountable to parliament whose members are accountable to the people during elections. Accountability can be said to

function properly in this model when every actor is required to give account to its superior so that a single accountability chain runs from policy implementers all the way up to voters.

This model of accountability has come under stress as an indirect consequence of public sector reforms (Considine, 2002). A wide variety of new accountability practices – both mandatory and voluntary – that have been introduced to remedy accountability problems caused by the structural disaggregation of the public sector that has taken place over the last couple of decades (Michels & Meijer, 2008). These new practices are often enacted outside the hierarchical relationship that is associated with the “ideal-typical” unitary model of delegation and accountability (Strøm, 2000). As such, reforms in the public sector ‘have stretched the elasticity of our received notions of accountability to the breaking point’ (Considine, 2002, p. 23).

In response to these changes, many new concepts – including voluntary accountability – have been proposed with the aim to align the accountability idiom with the new empirical reality (see Table 2.1 for an overview). Together, these concepts reflect the increasingly complex, multidirectional “web of accountability” (Page, 2006) in which public institutions operate these days. The growing role of the internet as a platform for societal accountability (Bovens, 2007) has led to the development of concepts like web-based accountability (Saxton & Guo, 2011) and dynamic accountability (Schillemans et al., 2013). Related concepts such as direct accountability (Meijer, 2005), citizen accountability (Meijer & Schillemans, 2009), participatory accountability (Damgaard & Lewis, 2014) and citizen-initiated accountability (Schillemans et al., 2013) were coined to describe the growing influence of citizens in accountability processes. Other authors have proposed concepts that describe the growing role of all kinds of stakeholders in horizontal, multi-actor and multi-level governance settings, such as media accountability (Maggetti, 2012), informal accountability (Romzek et al., 2012), mutual accountability (Whitaker et al., 2004), extended accountability (Hall et al., 2000) and stakeholder accountability (Meijer, 2007).

The vast majority of practices flagged by these new concepts are undertaken voluntarily by account-givers. As such, the proliferation of new accountability concepts should be seen in the light of the ‘trend towards the introduction of forms of accountability which are not provided for in legislation’ (Koop, 2014, p. 565). Similar trends have been described in the non-profit sector (i.e., voluntary accountability clubs) and the private sector (i.e., corporate social responsibility). It is noteworthy that Bovens (2007) traces the emergence of horizontal accountability (which is primarily voluntary in nature) to the debate about corporate social responsibility: ‘Influenced by the debate on *corporate social responsibility and corporate governance in business*, more attention is being paid to the role of non-governmental organisations, interest groups and customers or clients as relevant ‘stakeholders’, not only in determining policy, but also in rendering account’ (Bovens, 2007, p. 457, emphasis in original).

Whereas scholars studying corporate social responsibility (Roberts, 2003) and voluntary accountability clubs (Gugerty & Prakash, 2010) have sought to construct all-encompassing frameworks for analysing these new phenomena, the public administration literature has been

flooded with many new, somewhat disjoint concepts. While new concepts can be incredibly valuable, there is a need for a more integrated approach. *First*, it is often difficult to gauge how the different concepts relate to each other. In some cases, the similarities are even so substantial that concepts can be considered synonyms. *Secondly*, only relatively few concepts are clearly defined, demarcated and embedded within the broader conceptual structure of accountability. This is also reflected in the different uses of the same concept (see column ‘compare with’ in Table 2.1). *Thirdly*, most concepts are used sporadically, which hinders broader theory development.

■ **Table 2.1: Overview of recent accountability concepts**

Concept	Author(s)	Definition	Compare with
Informal	Romzek et al. (2012, p. 443)	‘[T]he unofficial expectations and discretionary behaviors that result from repeated interactions among network members in recognition of their interdependence in pursuit of their shared goal(s).’	
Social	Joshi and Houtzager (2012, p. 146)	‘[C]itizen-led action for demanding accountability from providers.’	Bovens (2007, p. 457) and Brummel (2021)
Extended	Hall et al. (2000, p. 84)	‘[I]nterdependent relationships within the regulatory space ... acting as constraints on [the actor] to explain and justify its actions and decision.’	Thomann et al. (2018)
Media	Maggetti (2012, p. 388)	‘[A]ccountability of [Independent Regulatory Agencies] before the media.’	
Mutual	Whitaker et al. (2004, p. 115)	‘[K]ey stakeholders in dialogue to determine responsibilities, authorize discretion, establish reporting procedures, and create review processes for the relationship.’	
Dynamic	Schillemans et al. (2013, p. 415)	‘[O]pen data systems that allow citizens and stakeholders to use the data to hold governments accountable.’	
Citizen-initiated	Schillemans et al. (2013, p. 415)	‘[An] initiative ... from citizens who may also use their own observations and data to summon authorities to action or hold them accountable for their policies.’	
Web-based	Saxton and Guo (2011, p. 272)	‘[A]ny online reporting, feedback, and/or stakeholder input and engagement mechanisms that serve to demonstrate or enhance accountability.’	
Citizen	Meijer and Schillemans (2009, p. 255)	‘[M]echanisms and practices where public sector organisations directly account for their conduct in the broadest sense of the words to citizens, clients or more generally to societal stakeholders.’	
Stakeholder	Meijer (2007, p. 167)	‘[F]orms of accountability that start from the notion of stakeholders as accountability forums.’	

■ Table 2.1: Continued

Concept	Author(s)	Definition	Compare with
Participatory	Damgaard and Lewis (2014, p. 262)	'[T]he degree that citizens are enabled to oblige an accountee to explain or justify his or her conduct, pose questions and pass judgment, and define and apply possible consequences.'	Hupe and Hill (2007)
Direct	Meijer (2005, para. 6-8)	'[Forms with] no or few formal rules for information provision ... no format for debate ... [and] no formal sanctions.'	
Horizontal	Schillemans (2011, p. 309, emphasis in original)	'[F]orms of accountability <i>where the accountee is not hierarchically superior to the accountant.</i> '	O'Donnell (2003)

In this chapter, we propose a framework of voluntary accountability as a unifying concept. Our focus is on *voluntary practices* as existing accountability frameworks have proved to be valuable analytical tools for studying mandatory accountability. Yet, they are less well-equipped for studying voluntary accountability because they define accountability as an obligation. Hence, the gap in the conceptual structure of accountability relates to voluntary accountability specifically. This chapter sets out to extend the analytical value of existing frameworks to the realm of voluntary accountability practices – which are increasingly relied upon in modern governance. We will concentrate exclusively on voluntary accountability *within the public sector*, as others have already developed conceptual frameworks for similar phenomena within the non-profit sector (Gugerty & Prakash, 2010) and the private sector (Roberts, 2003). As our approach is firmly rooted in existing understandings of accountability, we believe the framework can contribute towards a more systematic and integrated analysis and evaluation of voluntary accountability in modern governance.

2.3 DESCENDING THE CONCEPTUAL LADDER OF ACCOUNTABILITY: DEFINING VOLUNTARY ACCOUNTABILITY

Voluntary accountability is a subtype of the broader concept of public accountability. Following the logic of Sartori's ladder of abstraction (1970), a specification of another concept needs to have all properties of the higher-level concept. This implies that any property of accountability should also be incorporated in the conceptualization of voluntary accountability. To this end, it is important to clarify first what accountability is and how voluntary accountability differs from other types of accountability before delving into the meaning of voluntary accountability itself. Accountability can be 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). This definition highlights two important properties of accountability that are commonly agreed upon in the literature.

First, accountability constitutes a *social relationship* between an account-giver and an account-holder (e.g., Black, 2008; Bovens, 2007; Busuioc & Lodge, 2017). This relational element of accountability is regarded as *crucial* for discerning between accountability and related,

but distinct, concepts such as transparency or openness. While the former represents a communicative *interaction*, the latter may be entirely *one-directional*. The *interaction* element is a critical element for a practice to qualify as accountability (irrespective of the form it might take). Secondly, accountability has three phases (Bovens, 2007). The process begins with the *information* phase, in which the actor informs the forum on its conduct. Thereafter, the forum assesses this account in the *discussion* phase. The forum judges the adequacy of the provided information, may ask for more information and can pose follow-up questions. At the final *consequences* phase, the forum may apply sanctions or rewards in line with its judgement.

The fundamental difference between voluntary accountability and mandatory accountability lies in the *nature of the obligation*. Unlike mandatory accountability, voluntary accountability is rendered in the absence of a *de jure* obligation. Such obligations are usually set out in legislation, statutes, contracts, regulations and other legal documents that determine the rights and duties of an organisation. However, this binary categorization – i.e., voluntary accountability versus mandatory accountability – hides a whole spectrum of accountability. As noted before, accountability processes, by definition, have three phases: information, discussion and consequences. In practice, obligations often pertain only to the first phase or the first and second phase, but not to all three phases. Approaching the concept in this manner reveals that two other accountability processes can be discerned that consist of a mix of both mandatory and voluntary phases (see Table 2.2).

First, *mandated transparency* occurs when an actor is required to release information without any further responsibilities for external parties to use this information for account-holding. Freedom of information acts, sunshine laws and the release of performance information by inspectorates are typical practices that fall under this category. These measures guarantee the disclosure of information, but they do not ensure that an assessment about the actor's conduct is made by a forum or that proper consequences are available and implemented (Meijer, 2007). This is consistent with established accountability conceptualisations that have already noted that information provision/transparency alone is a pre-requisite of accountability but not a sufficient condition for it. Only when the information provided gives rise to scrutiny, such practices qualify as a genuine form of accountability (Bovens, 2007, p. 453).

Second, the category of *weak mandatory accountability* consists of practices whereby a forum is granted authority to demand information from an actor and formal rules warrant debate, but the forum lacks formal sanctioning power. Thus, the difference with traditional mandatory accountability pertains to the possibility of consequences, which is largely absent in the case of weak mandatory accountability. Examples of weak mandatory accountability are client panels and user councils. Such bodies are granted access to information and organisational leaders are required to appear a minimum number of times per year before the panel or council (Meijer & Schillemans, 2009). Yet, there is no formally defined opportunity to impose sanctions or rewards. Such practices contain the critical element of interaction between actors and forums and as such qualify as accountability – albeit in its weaker form (due to a lack of consequences). Such bodies

generally tend to resort to informal sanctions or rewards (e.g., public praise, expressing criticism, inducing feelings of shame) or rely on other forums to enact actual consequences.

■ **Table 2.2: The absence/presence of obligations in each accountability phase**

Categories of accountability	Accountability phases			Is it accountability?
	Information provision	Assessment by forum	Possibility of consequences	
Proactive transparency	Voluntary, but provided	Unregulated & absent	Undefined & unlikely	No
Voluntary accountability	Voluntary, but provided	Unregulated, but present	Undefined, but plausible	Yes
Mandated transparency	Required	Unregulated	Undefined	Only when the information provided is (expected to be) scrutinized
Weak mandatory accountability	Required	Regulated	Undefined	Only when informal sanctions and/or rewards are available
Traditional mandatory accountability	Required	Regulated	Defined	Yes

Thus, what sets voluntary accountability apart from other accountability processes is *the absence of an external obligation in all three accountability phases* (i.e., information, discussion and consequences). Yet, all three phases need to be present for a full-fledged accountability process to occur. Coupled with the crucial notion that accountability is relational, voluntary accountability then refers to *a relationship between an actor and an engaged forum, in which the actor voluntarily commits itself to offering information on, and explanation of, its conduct and may face consequences*. While this definition does not contain any reference to an “obligation”, it is firmly rooted in existing conceptualizations of accountability. It stays close to these conceptualizations by stressing the relational core of accountability as well as the three phases.

Although the proposed definition stays close to Bovens’ established conceptualization in many respects, there are important implications of this seemingly small adjustment. As we will demonstrate below, the voluntary element has important consequences for thinking about *why* account is rendered, *why* actors are held accountable, as well as *how* and *to whom* account is rendered. While these aspects are imposed – and, therefore, fixed – by an external actor in traditional, mandatory accountability processes, this is not the case when account-giving is voluntary. The whole relationship between the actor and the forum is *not* – in contrast to mandatory accountability processes – *predefined* by an external obligation. Consequently, the establishment of an accountability relationship is entirely based on discretionary decisions in the case of voluntary accountability.

It should be noted that this discretion exists on *both sides of the relationship*. The proposed definition underlines this by speaking of a relationship between an actor and an *engaged* forum. For it to be described as voluntary *accountability* (which requires the presence of a ‘social relationship’), not only does the actor seek accountability, but there should also be a forum that wants to hold the account-giver accountable. This means in practice that voluntary accountability requires acceptance by *both the actor and the forum*. Actors commit to this relationship by providing information and explanations, while forums can accept this relationship by assessing the information provided and considering sanctions or rewards. Thus, there are two requirements that need to be fulfilled before a practice qualifies as voluntary accountability: *voluntary commitment from the actor* (“actor self-committal”) and *engagement from the forum* (“forum engagement”).

Importantly, scrutiny by a specific forum is always required to meet the accountability threshold; a process that stops after voluntary information disclosure does not qualify as accountability. To illustrate this point, a public institution may maintain a publicly available website with information about its own performance, but this fact alone does not mean that it is accountable. Whether maintaining a website can induce an expectation of accountability and help to keep the public institution in check ultimately depends on the extent to which another party ‘accepts’ the relationship. Concretely, this means the presence of an account-holder – for example, an individual citizen, a journalist, an interest group or a politician – that *could*, and *is willing to*, evaluate the website’s information and pass judgement. It should be noted that not every release of information on the website needs to be followed up by a forum before it can be regarded as accountability. Yet, overall forum engagement should be substantial enough to induce a *general* expectation of accountability on the side of the actor. The rationale for this is that an actor will only adjust its behaviour in anticipation of being held accountable when it knows from past experience that scrutiny is a realistic expectation. Thus, maintaining a website does *not* qualify as accountability when forum engagement is largely a hypothetical scenario without much precedent in reality. This would for instance be the case when a website is not visible, attracts few visitors and is rarely used by stakeholders for interactions with the actor. Of course, the manifestation of forum engagement depends on the practice under examination. Forum engagement can be expressed in metrics such as the number of replies to a Tweet from a public institution, the extent to which press releases spur media coverage or the number of responses from stakeholders to a self-initiated consultation procedure.

With this definition of voluntary accountability in mind and along the lines of Bovens’ framework, we identify four questions that need to be asked when accountability is voluntary (cf. Bovens, 2007). The *first* question is *why does the actor render voluntary account?* This question relates to possibly the main difference with mandatory accountability, where account must be given regardless of the motivations of the account-giver. Whereas in the case of mandatory accountability the answer is straightforward (“because it is required by mandate”), in the case of voluntary accountability this becomes the central question to explicating the rise of voluntary accountability and its drivers. As we will see below, several competing rationales have been put forward in extant literature. The *second* question is *why are actors held accountable?* This question

logically follows from our definition of voluntary accountability, which implies, as argued above, the presence of an engaged forum. The *third* question pertains to *how* is the account rendered? Unlike mandatory accountability, in the case of voluntary accountability actors can freely *choose* from a broad arsenal of accountability instruments which differ greatly in form and function. Recognition of this great diversity is crucially important, we argue below, for understanding the varying rationales behind accountability-seeking behaviour. The *fourth* and final question is to whom the account is rendered? This question is related strongly to the third question as certain instruments are typically geared towards certain forums (e.g., voluntary accounts on social media are often geared towards the general public). While answering these last two questions in the case of mandatory accountability results in a mapping of different typologies of accountability relationships provided for by formal design, doing so in the case of voluntary accountability allows us to understand which social relationships actors are actively pursuing and initiating of their own accord. Crucially, because in the case of voluntary accountability actors are not mandated but rather have a choice of which forum to give account to, and about what (i.e., the content of their accounts), tackling these questions simultaneously gives us a level of insight into actor motivations (the “why” of voluntary account-giving). The first two questions will be discussed in the next section and the other two questions will be discussed thereafter.

2.4 INVESTIGATING THE RATIONALES FOR ACTOR SELF-COMMITTAL AND FORUM ENGAGEMENT

2.4.1 ACTOR SELF-COMMITTAL: WHY ACCOUNT IS RENDERED

Whereas when it comes to mandatory accountability it is irrelevant to the existence of the accountability relationship whether the actor is actually motivated to be accountable – i.e., there is no choice –, this is in fact the focal point in the debate around voluntary accountability. This debate revolves around adjudicating between different driving rationales explaining voluntary accountability behaviours, specifically the logic of appropriateness and the logic of consequence. Koop (2014, p. 567) has argued in a key study on voluntary accountability that voluntary account-giving ‘does not have clear advantages for the organizations that render account.’ Consequently, accountability-seeking behaviour should be understood as following from the logic of appropriateness. That is, it follows from ‘internalized prescriptions of what is socially defined as normal, true, right, or good, without, or in spite of calculation of consequences and expected utility’ (March & Olsen, 2011, p. 480). This explanation of voluntary accountability fits well within the *democratic* perspective of accountability which stresses the normative connotation of the concept and its role in sustaining democracy.

Karsten (2015) questions the proposition that account-giving is costly for the account-giver and proposes the logic of consequences as an alternative explanation. This logic entails that an actor evaluates the consequences of possible actions and chooses to do what is expected to contribute most to the fulfilment of one’s own goals (March & Olsen, 2011). In accordance with this logic, Karsten (2015, p. 697) contends that voluntary account-giving is motivated by *political-strategic*

motivations. That is, it is the result of a cost-benefit analysis made by self-interested actors ‘who estimate the strengths and weaknesses of alternative types of accountability behaviour under different circumstances.’

Other authors have proposed additional rationales that do not neatly fit within the logic of appropriateness or the logic of consequences (Busuioc & Lodge, 2016, 2017; Schillemans, 2011). Various scholars have pointed to *learning motivations*. On the one hand, learning motivations can be seen as following from the logic of appropriateness. It has been argued that empowering stakeholders through accountability can help an organisation to better cater to the needs of those who it is supposed to serve (Damgaard & Lewis, 2014, p. 259; Schillemans, 2011). On the other hand, there may also be an instrumental rationality at work. Many public sector organisations need to obtain information from stakeholders in their environment in order to draft high-quality policies and make sensible decisions. Hence, establishing accountability relationship with the possessors of this valuable information can help to satisfy organisations’ informational needs (Arras & Braun, 2018).

Still other authors have pointed to *reputational motivations*. These scholars argue that account-giving affords the account-giver an opportunity to highlight favourable aspects of the organisation (Busuioc & Lodge, 2016, 2017; Doering et al., 2021). Voluntary account-giving may therefore be part of a strategic effort to build broad public support, which is crucially important for sustaining (regulatory) power, gaining autonomy and overcoming opposition (Carpenter, 2010b). Such accounts put emphasis on voluntary accountability as a form of *strategic* reputational management. Yet, cultivating one’s reputation can also be seen as normatively appropriate behaviour. As suggested by Maggetti and Papadopoulos (2018, p. 180), ‘reputation may not only have an instrumental value but be intrinsically valued too.’ Busuioc and Lodge (2016, p. 250, emphasis in original) wrote on this very point that the process of reputation-building through account-giving ‘is not necessarily always strategic. Actors can come to internalize audience expectations, and to this extent, the relationship can come to be *constitutive*.’

This short overview of the extant literature shows that valuable efforts have been made to theorize and document possible rationales behind accountability-seeking behaviour. It further indicates that the jury is still out on what exactly motivates actors to seek accountability. What we will argue in more detail below is that the multiplicity of rationales should be seen in the light of the different manifestations of voluntary accountability as well as the social relationships in which it occurs. This implies that this question (i.e., why account is rendered) cannot be addressed separately from the other three questions that characterize voluntary accountability (i.e., why actors are held accountable, how and to whom account is rendered). Section 2.5 elaborates on this argument, but we will first expand upon the notion of forum engagement.

2.4.2 FORUM ENGAGEMENT: WHY ACTORS ARE HELD ACCOUNTABLE

As noted before, forum engagement is an integral aspect of voluntary accountability, and public accountability more broadly, and a key element to whether an accountability-seeking practice qualifies as accountability. Yet, it has often been overlooked that its presence cannot be taken-for-

granted, even though there is no theoretical ground to assume the presence of forum engagement *a priori* in the case of voluntary accountability. As Meijer (2014, pp. 513-514, emphasis added) writes, 'there is no *ex ante* reason to assume that transparency and accountability are "friends": we need to evaluate their relation on the basis of *empirical* research.' Meijer (2014, p. 517) also notes that one lesson that can be drawn from the existing literature is that 'proactive transparency has little value for accountability.' In a similar vein, Busuioc and Lodge (2017, p. 98, emphasis added) write that what defines voluntary accountability is the 'one-sided, nonrequested, voluntary character of the interaction, with a forthcoming account-giver and relative *disinterested passivity on the side of the account-holder*.'

The literature mentions at least five reasons why potential account-holders are hesitant to take up a role as engaged forum. First, they may fear that they will be blamed for unpopular decisions or insufficient oversight, as hinted by Damgaard and Lewis (2014) in regards to people's observed lack of motivation to participate in client councils. Second, actors may provide so much unstructured, decontextualized information that stakeholders need to invest a lot of resources to distinguish the relevant information from the noise – a strategy which Hood (2007, p. 204) illustratively labelled 'snowing'. Thus, voluntary accountability may not only contribute to "accountability overloads" on the side of actors (Bovens et al., 2008), but also to "information overloads" on the side of forums. Third, an actor can also decide to present highly polished, biased information that has little value for assessing the actor's conduct (Meijer, 2014). As voluntary accountability happens basically on the actor's own terms, there are no formal rules that ensure that an actor's initiative is anything more than a presentational strategy. Fourth, it may be that potential account-holders lack necessary capacity, skills, resources or knowledge to assess complex information, such as in the case studied by Lindén (2015), where lay audiences were invited to review appeals of asylum seekers whose applications were rejected. Finally, Mizrahi and Minchuk (2019) have argued, and demonstrated empirically, that citizens face a collective action problem when trying to hold public sector organisations accountable; their survey results show that citizens are less inclined to monitor these organisations when the costs of monitoring are not shared equally. Such accounts underline that forum engagement cannot be taken-for-granted. Succinctly, forum engagement is critical because in its absence accountability becomes indistinguishable from transparency.

Apart from the substantive relevance of understanding the "other end" of accountability relationships better, empirical assessments of forums' behaviour help to determine to what extent actor self-committal results in full-fledged accountability processes. Note that assessing the level of forum engagement is also relevant when studying mandatory information provision (i.e., mandated transparency), as forum engagement cannot be taken-for-granted in this case either. According to the Oxford Handbook of Public Accountability, transparency relates to 'the availability of information about an actor allowing other actors to monitor the workings or performance of this actor' (Meijer, 2014, p. 511). Hence, forum engagement is essentially the marker of the difference between genuine voluntary accountability practices and mere transparency. Consequently, *actor self-committal without any (possibility of) forum engagement can easily be misclassified as voluntary accountability when forum engagement is left out of the analysis*. As the

literature has identified multiple reasons why potential account-holder do not become engaged, it may be that the most that can be claimed in many cases of actor self-committal is enhanced transparency or openness (rather than accountability). Conflating voluntary accountability with such concepts is problematic because ‘transparency as such is not enough to qualify as a genuine form of accountability’ for the reason that ‘transparency does not necessarily involve scrutiny by a specific forum’ (Bovens, 2007, p. 453).

Hence, it is crucial to assess *empirically* the degree of forum engagement following from an actor’s initiative. Not performing this empirical assessment will inevitably lead to a too ‘rosy picture’ about the state of accountability in modern governance by leading us to document phenomena as accountability that do not meet the accountability threshold.

2.5 HOW AND TO WHOM VOLUNTARY ACCOUNT IS RENDERED

Besides discretion regarding the commitment to accountability, actors are also free to choose *how* and *to whom* account is rendered. Although voluntary accountability is more often than mandatory accountability geared towards society (Bovens, 2007; Koop, 2014; Verschuere et al., 2006), empirical studies on voluntary accountability reveal there is in fact a lot of variation in the practices adopted. This variation exists both in terms of the type of instrument relied upon to render account (i.e., *how* account is rendered) as well as in terms of the type of forum involved (i.e., *to whom* account is rendered). The variety of voluntary practices documented in extant literature can nevertheless be grouped in three broad categories, each of which represents a functionally different form based on *how* and *to whom* account is rendered. While some voluntary account-giving will – much like a “message in a bottle” – be aimed at *no specific forum in particular*, other practices involve the provision of more targeted voluntary accounts, such as the use of consultative forums or presentations in which account is rendered to *specifically selected societal stakeholders or to principals*.

Answering these questions (i.e., *how* and *to whom?*) – beyond offering us different typologies of voluntary accountability – is important, we argue, in offering us clues as to *why* account is being given and the degree to which forums are generally engaging with the voluntary account (as summarized in Table 2.3). That is, each category of practices is related to a different set of driving motivations (see column ‘logic of action’ in Table 2.3) and different rationales for forums to engage with account-givers, leading to varying expectations about the presence of forum engagement (see column ‘expected forum engagement’ in Table 2.3). In other words, the four questions are interlinked and the answer depends on the type of practice under consideration.

The typology thus highlights that different types of voluntary accountability have distinct features that must be recognized in order to make conceptual and theoretical sense of the great diversity of practices that are classified as voluntary accountability. Most importantly, the motivations behind accountability-seeking behaviour will plausibly vary depending on how and relatedly, to whom voluntary accounts are rendered. Rendering account without a specified forum in mind

(“message in a bottle”) will presumably provide an organisation with different benefits than those to be gained from engaging a specific constituency. While in the former case, voluntary account-giving might serve to signal a general organisational commitment to openness, the latter will serve to gain support or resources that a specific constituency alone can provide. As such, discerning between types of voluntary accountability can potentially account for contrasting findings on motivations behind voluntary accountability towards the general public (Koop, 2014) versus voluntary accountability towards political representatives and voters (Karsten, 2015). In other words, moving beyond the current understanding of voluntary accountability as a unitary phenomenon – driven by a common underlying logic – will help us to grasp the *varied* rationales behind it. We elaborate on each voluntary accountability type in turn.

2

■ **Table 2.3 Types of voluntary accountability**

Label	How?	To whom?	Logic of action	Expected forum engagement
A message in a bottle	Press releases/conferences Media appearances Social media Interactive websites Open data systems	<u>General audience:</u> Mass media Social media users The general public	<u>Mixed:</u> Democratic motivations Reputational motivations	Low
A discerning voluntary account	Advisory boards Consultative forums External reviews by stakeholders or peers Client panels User councils	<u>Specific societal stakeholders:</u> Interest groups Clients & users Professional peers Regulatees	<u>Mixed:</u> Reputational motivations Learning motivations	High
Paralleling the principal-agent relationship	Requests for parliamentary hearings and parliamentary visits Deliberations with citizens as voters	<u>Principal:</u> Parliamentary committees Politicians Citizens as voters	<u>Logic of consequences:</u> Political-strategic motivations	Medium

2.5.1 A MESSAGE IN A BOTTLE: ANYONE THERE?

Documented voluntary practices of this type are generally geared towards a wider, often unknown, public. Since the introduction of new communication technologies, particularly social media and the internet, this type of voluntary account-giving has become commonplace. Nowadays, many public sector organisations rely on these technologies to demonstrate accountability directly to citizens (Bertot et al., 2012). Additionally, traditional media are increasingly recognized as a significant forum (Maggetti, 2012). The media can spark new accountability processes by uncovering misconduct (e.g., the Watergate scandal), but the media are also the target of many voluntary accounts. Many organisations proactively render account to the media and, by extension, the general public through means of press releases/conferences and interviews (Puppis et al., 2014).

Practices aimed at informing such *general audiences* can be seen as a “message in a bottle” because the actor disseminates information in the public domain about its behaviour without knowing in advance who – if anyone – will actually find and use this information to hold the actor accountable. While various authors have noted the potential utility of practices aimed at general audiences for enhancing accountability (Bertot et al., 2012; Puppis et al., 2014; Schillemans et al., 2013) and some authors use the adoption of this type of practices as an indicator of accountability (Christensen & Lodge, 2018; Koop, 2014; Saxton & Guo, 2011), forum engagement is arguably particularly difficult to achieve with practices of this nature. As shown by Mizrahi and Minchuk (2019), general audiences face a collective action problem because the costs and benefits of monitoring are distributed unevenly. Moreover, it is often unclear with this type of practices whether potential account-holders would be interested in the information at all. Consequently, forum engagement will likely be *low* when account is rendered to general audiences.

Given their non-targeted character, such “message in a bottle” practices are likely driven by the logic of appropriateness – and democratic motivations in particular – rather than consequential thinking. The most important function of accountability towards the general public is to democratize modern governance (Willems & Van Dooren, 2012). It puts citizens in the position to hold organisations directly accountable (rather than indirectly via the ballot box), which explains why it is heralded as the remedy against alleged ‘democratic deficits’ (Bovens, 2007). Given the strong connotation with democratic quality, public officials may see it as their democratic-civic duty to explain and justify the use of taxpayers’ money to society (Olsen, 2013), consistent with the logic of appropriateness. Moreover, “message in a bottle” practices have the least tangible benefits for the account-giver because the general public typically cannot provide material rewards or expert information. Consequently, consequential thinking seems a less probable explanation for this type of account-seeking behaviour (Koop, 2014). Nevertheless, beyond internalised expectations, proactively reaching out to the general public by explaining and justifying one’s actions may perhaps be essential for securing more elusive resources, such as trust from citizens, a positive public image, support from one’s environment and legitimacy (Busuioc & Lodge, 2017).

2.5.2 A DISCERNING VOLUNTARY ACCOUNT: TARGETING SPECIFIC SOCIETAL STAKEHOLDERS

This type of voluntary account-giving involves practices in which account is rendered towards often specifically selected stakeholders who enjoy a privileged status that separates them from the general public. Members of these groups are often selected based on certain criteria, such as expertise, representation of interests or professional background. Consultative forums, stakeholder boards, visitations and external reviews (Arras & Braun, 2018; Busuioc & Jevnaker, 2022) are some examples. Another well documented example is the use of public advisory committees by agencies, in the absence of formal obligations in that respect (Moffitt, 2014). Organisations can also engage with specific stakeholders by establishing public consultation procedures. Agencies in the US (Magill, 2009; Reiss, 2011), several European countries (Thatcher, 2002) and the EU (Arras & Braun, 2018) have been found to hold public consultation procedures in the absence of, or beyond, statutory responsibilities. Although such procedures are in principle

open to everyone, they typically function as an instrument for advantaged stakeholders to provide technical feedback on specific issues (Yackee & Yackee, 2006). Note that these practices are mandatory for some organisations (Schillemans, 2011); it depends on an organisation's formal obligations whether these practices are undertaken voluntarily.

One plausible dominant rationale behind these practices is learning. Public institutions may feel that such practices are necessary as to obtain relevant information and policy feedback from stakeholders in their environment. This motivation may be particularly strong among actors with high informational needs such as regulatory agencies (Arras & Braun, 2018). Reputational considerations may also play an important role. Rendering account to allying stakeholders may be part of a coalition-building strategy, whereby the actor seeks to build a coalition that can function as a counterweight against the democratic control exercised by principals (Carpenter & Krause, 2015).

Forum engagement can be expected to be relatively *high* when voluntary accounts are targeted at specific societal stakeholders. Often, these stakeholders will have a strong interest in engaging with the account-giver, such as when regulatees try to exert influence on the rules of a new regulation through public consultation procedures (Joosen, 2021). It has been pointed out that too much forum engagement, especially when certain interests are overrepresented in the forum, raises concerns about the potential undemocratic effects of accountability towards societal stakeholders. In such cases, account-giving may give way to bias or even capture (Arras & Braun, 2018; Busuioc & Jevnaker, 2022). Moreover, strong accountability ties with societal stakeholders can lead to offsetting the control of legitimate authorities (Bertelli & Busuioc, 2021).

2.5.3 PARALLELING THE PRINCIPAL-AGENT RELATIONSHIP: RE-ENGAGING THE PRINCIPAL

Voluntary accountability practices occur not only towards horizontal forums, as discussed above, but can also be vertical in nature – i.e., targeted towards principals. This type of voluntary accountability involves practices that are voluntarily initiated by actors upwards, towards new or existing *principals*. That is, they exist *in parallel* with mandatory accountability mechanisms such as appointment and dismissal procedures, parliamentary hearings and reporting requirements. The existence of voluntary accountability in vertical relationships is intriguing because it contrasts Bovens' claim (2007, p. 460) that vertical accountability is always mandatory, whereas horizontal accountability happens basically on a voluntary basis. Requests for hearings before the European Parliament (EP) by EU agencies (Busuioc, 2013) and the European Central Bank (Jabko, 2003) are instances of voluntary accountability running in parallel with the principal-agent relationship. Karsten (2015) has examined accountability-seeking behaviour by Dutch local political executives towards municipal councillors and voters. These relationships can be seen as principal-agent as well, since voters mandate municipal councillors through local elections, after which the elected representatives delegate part of their authority to political executives.

It has been suggested that account-giving towards principals is undertaken to re-engage with principals (Schillemans & Busuioc, 2015, p. 210). This strategy is particularly attractive

when principals – which often hold powerful tools at their disposal (e.g., budgetary, mandate amendments) – show low interest in the actor. Under these conditions, the actor may run the risk of being forgotten, with potentially far-reaching consequences for the budget and the allocation of tasks. Hence, it can be expected that voluntary account-giving towards principals will occur in particular when the principal is not actively engaging with the account-giver. Yet, the principal being targeted with voluntary accounts will presumably not be completely unwilling to scrutinize the conduct of the account-giver since this would be detrimental for the relationship with the actor in question. Consequently, forum engagement can be expected to be *medium* when the account is geared towards principals.

Such voluntary practices are presumably driven by consequential thinking rather than the logic of appropriateness as it has clear political-strategic advantages for the account-giver. Schillemans and Busuioc (2015, p. 210) list several advantages, including ‘gains in terms of reputation, relations, political salience, credibility and even autonomy.’ Therefore, they suggest that ‘rational public bodies and organizations will not necessarily choose to escape accountability, but to the contrary, it might be in their *strategic interest* to promote and expand on their accountability’ (Schillemans & Busuioc, 2015, p. 210, emphasis added). Busuioc (2013) suggests that a resource reasoning is at play; agency leaders may view agency-initiated parliamentary hearings as an opportunity to profile their organisation, to lobby for parliamentary support and secure financial resources. Similarly, Karsten (2015, p. 696, emphasis added) mentions four ways in which account-giving towards principals ‘serves the *political-strategic interests* of the accountant.’ Likewise, Jabko (2003, p. 721, emphasis added) has shown that the European Central Bank’s decision to seek accountability towards the EP was ‘the result of a *simple calculation* – the expected gains in terms of consolidated independence are far higher than the expected costs of acknowledging the European Parliament’s role as a privileged interlocutor.’

2.6 IMPLICATIONS AND WAYS FORWARD

To recap and bring together the various threads discussed above, the conceptual framework presented above (see Table 2.3) allows us to better understand the drivers, manifestations and implications of accountability-seeking behaviour by public sector organisations. The framework gives impetus to novel directions for research on voluntary accountability. Most importantly, the conceptual framework helps us to differentiate voluntary accountability from other phenomena with which the concept has increasingly been conflated. It helps to separate general communicative and bureaucratic practices from those specific practices that meet the accountability threshold. As such, the framework is a useful instrument for evaluating whether a voluntary practice meets the full accountability criteria. This is important since a whole range of voluntary practices have been described as accountability instruments without careful consideration of the mechanism through which these practices are supposed to bring about increased accountability. Hence, there is a serious risk that many practices have been routinely conflated with voluntary accountability. This can lead us to over-diagnose the incidence of voluntary accountability, lulling us into a somewhat false sense of security as to the state of accountability in modern governance. This

demonstrates the importance of treating *forum engagement* as an integral aspect of voluntary accountability and the need for empirical researchers to assess the degree to which actors are actually held accountable through voluntary practices.

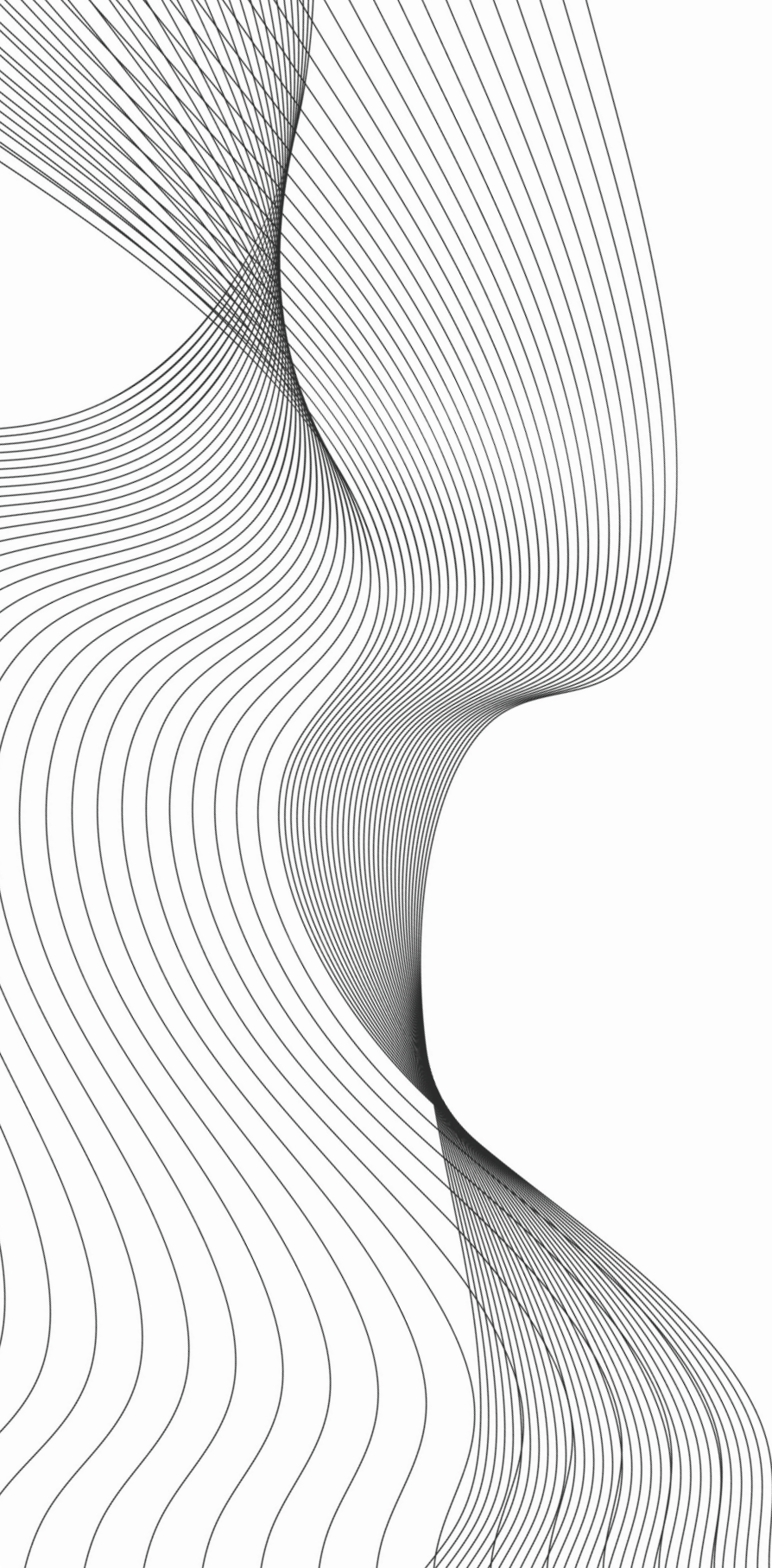
The framework could, for instance, be used to address questions about the promise of social media – a prototypical example of a “message in a bottle”-type of practice – for accountability (Bertot et al., 2012). The framework reminds us that it is neither the intentions of public bodies nor the properties of social media that determine whether social media contributes to public accountability, but the presence of mutual interactions between account-givers and account-holders. Importantly, the framework shifts the attention from asking questions about whether social media *can* bring about more accountability (for which the answer is typically “yes”) to asking questions regarding the actual enactment of accountability on social media. The proposed framework can aid us in studying this empirically. For instance, little is known about the extent to which Twitter promotes actual accountability, although it is often discussed as an example of voluntary accountability. Our framework will lead the analyst to examine the extent to which voluntary information provision on Twitter by public bodies results in actual forum engagement (i.e., citizens engaging with the tweets of public bodies) and/or consequences (i.e., the extent to which public bodies face consequences, whether reputational or other). Alternatively, one could, for instance, survey citizens to measure their willingness to engage with public bodies on social media or conduct a content analysis of citizens’ responses to messages from public bodies. Thus, the framework directs the analyst to relevant questions that need to be addressed to assess whether social media meets the accountability threshold and to make informed normative judgements about the promise of social media for promoting accountability in modern governance.

The conceptual clarification is also useful to move us forward in investigating the *rationales* behind voluntary accountability – a topic of considerable academic debate (Busuioc (Busuioc & Lodge, 2017; Karsten, 2015; Koop, 2014; Schillemans, 2011) and high theoretical relevance (Schillemans & Busuioc, 2015, p. 209). A core concern in the literature has been to adjudicate between two competing logics – i.e., the logic of appropriateness and the logic of consequences – to identify *the* logic that serves as a general driver behind accountability behaviour. Instead, the discussion above points at the need to determine *under which conditions* a certain motivational logic is most likely to become a dominant driver of account-seeking behaviour. For instance, organisations facing insufficient resources might be driven towards one-on-one engagements with principals (e.g., voluntary accountability towards politicians who decide on much-needed resources), whereas a reputational logic might drive organisations to embrace practices involving the participation of a diverse group of societal stakeholders (such as public committees), when faced with specific threats that require broader public support (Moffitt, 2014).

Another important strand for future research refers to finding out which factors determine *how* and *to whom* actors seek to advance their accountability. It is uncontroversial to state that actors wish to be evaluated positively. However, this may shed light on the observed variation in voluntary accountability practices. As actors seek positive evaluation, they are likely to advance

their accountability towards forums from whom they expect *support* and *whose support they need*. In the words of Busuioc and Lodge (2016, p. 255), actors ‘prioritize their accountability-giving behavior toward those key audiences on whose endorsements they are dependent.’ This argument is in line with findings by Potter (2019) who found that public agencies in the US take more time to consult with societal stakeholders if there is greater ideological distance between the agency and Congress – one of the principals in the US. Potter (2019) explains this as a strategic effort by agencies to gather support from influential groups in anticipation of opposition from principals. In other words, actors may seek to advance their accountability to forums with favourable opinions in order to build support for policies that are regarded as undesirable by another forum. Such dynamics could have important consequences for the democratic function of accountability (Bertelli & Busuioc, 2021).

More generally, *the consequences of voluntary accountability* deserve more attention in order to provide a solid evidence base for any normative claim. Voluntary accountability is often considered a remedy for accountability gaps within the public sector and declining citizens’ trust in public institutions (Bovens, 2007; Schillemans, 2011). However, these positive consequences do not sum up the full picture of possible effects when strategic motivations are taken into account. Karsten (2015, p. 695) writes in this regard, ‘referring citizens and councillors to mechanisms through which they could be held to account and by stressing and facilitating their own accountability, executives tried to avoid citizen participation and councillors becoming involved in decision-making.’ In addition, it has been suggested that actors may emphasise one kind of accountability to resist other accountability claims when facing multiple, conflicting accountabilities (Black, 2008). For instance, hospital employees (Pellinen et al., 2018) and museum directors (Overman, 2021) have been found to emphasize their professional accountability in order to deflect responsibilities in terms of aspects of their accountability towards democratic institutions. Furthermore, actors may seek to cultivate an accountability relationship with an allying stakeholder to resist more demanding accountability relationships. For instance, Day and Klein (1987) describe in their classic book on accountabilities in the public sector how schools produce ‘self-accounts’ in order to create a dialogue with parents. These voluntary accounts ‘can be seen as a defensive strategy for creating a constituency of support designed to weaken attempts to move towards a hierarchical system of managerial accountability (...). Downward accountability is invoked in order to resist upward accountability; *giving an account is seen to be a way of avoiding being called to account*’ (Day & Klein, 1987, pp. 170-171, emphasis added). These examples show that, paradoxically, more voluntary accountability does *not* necessarily mean more democratic control. What is more, if strictly undertaken as presentational strategy, rational actors can be expected to particularly engage in voluntary accountability towards nonspecific, internally diffused forums. Under this condition, actors can expect maximal reputational benefits, as they *appear* accountable while facing low potential costs arising from close monitoring (Busuioc & Lodge, 2016, p. 254). This highlights that studying voluntary accountability not only contributes to an improved accountability theory, but also can give societally relevant insights and a fuller picture of the state of accountability in modern governance.





CHAPTER 3

A Multi-Audience Approach to Understanding Voluntary Accountability: The Motivation- Audience Link

This chapter is published as: de Boer, T. (2022). Why do public agencies seek accountability? The role of audiences. *Public Administration*. <https://doi.org/10.1111/padm.12859>



3.1 INTRODUCTION

Many public tasks have been delegated away from the core of government to public agencies at arm's length during the last couple of decades. Delegation to (quasi-)autonomous agencies is considered to pose a threat to the traditional, hierarchical model of accountability (Strøm, 2000) and failure to make agencies sufficiently accountable can undermine the legitimacy of modern governance (Bovens et al., 2008). Hence, guaranteeing accountability through the design of effective institutions is one of the major challenges for public administration today (Dubnick & Frederickson, 2010).

A notable and counter-intuitive development in this regard is that agencies – as well as other kinds of organisations operating at arm's length from government (Schwabenland & Hirst, 2020) – across the world and at both local, national and supranational levels have *voluntarily* adopted practices to enhance their accountability. Studies have documented voluntary accountability among a wide variety of public sector organisations, including national (Koop, 2014; Magill, 2009) and supranational (Arras & Braun, 2018; Busuioc & Jevnaker, 2022; Wood, 2018) (quasi-)autonomous agencies, municipalities (Doering et al., 2021; Karsten, 2015) and social service providers (Romzek et al., 2012). Voluntary accountability reportedly relies on a variety of mechanisms, including self-initiated public consultation procedures in the absence of/beyond statutory responsibilities (Arras & Braun, 2018), interactive websites and social media (Bertot et al., 2012), voluntary external reviews (Doering et al., 2021), actor-initiated requests for public/parliamentary hearings (Busuioc, 2013), self-regulation (Magill, 2009) and consultative forums (Arras & Braun, 2018; Busuioc & Jevnaker, 2022).

This 'persistent' phenomenon (Reiss, 2011, p. 647) is theoretically intriguing as dominant theory portrays agencies as generally accountability-avoidant (Schillemans & Busuioc, 2015). As a result, a scholarly debate has sparked about why agencies would commit themselves voluntarily to accountability. Attempting to adjudicate between possible competing rationales, various scholars have made valuable contributions to this debate by seeking to identify the core mechanism responsible for voluntary accountability. Different studies have proposed different dominant mechanisms at play. Albeit not an exhaustive overview, some of the dominant logics put forward read as follows. Schillemans (2011) has argued that accountability-seeking behaviour stems from the felt need to compensate for the inadequacy of traditional arrangements (e.g., ministerial responsibility), in the disaggregate context brought on by public management reforms. Koop (2014) on the other hand, has made the argument that accountability-seeking behaviour is driven by dominant institutional norms that prescribe accountability as an indispensable element of good governance in today's public sector or, alternatively, that such behaviour can be seen as strategic attempts to pre-empt calls for additional statutory provisions. Karsten (2015, p. 697) has contended that voluntary account-giving is the result of a cost-benefit analysis made by self-interested actors 'who estimate the strengths and weaknesses of alternative types of accountability behaviour under different circumstances.' Finally, Busuioc and Lodge (2016, 2017) have advanced reputational considerations as an important potential driver behind accountability-seeking behaviour.

While a variety of (competing) rationales have been proposed, it remains unclear when these mechanisms are likely to become a prevailing or dominant driver of voluntary accountability. This gap is significant since there is controversy over what factors are most important for safeguarding accountability in modern governance (e.g., Busuioc & Lodge, 2017; Olsen, 2013; Romzek et al., 2012; Scott, 2000). Studying voluntary accountability can help to illuminate our understanding in this regard as it provides a unique opportunity for evaluating competing accounts as to the relative importance of different incentive structures (e.g., institutional, reputational, moral, financial). As noted by Magill (2009, p. 900), it is 'a promising way to assess these competing accounts because it is voluntarily undertaken – and by that I mean it is generated by the agency even though no source of authority requires the agency to take an action.'

Rather than searching for one dominant mechanism, this study attempts to uncover when a particular mechanism, or a combination thereof, prevails. Specifically, this study aims to assess to which extent specific mechanisms are linked to specific types of audiences. Building on accountability studies (Bovens et al., 2008; Willems & Van Dooren, 2012) that indicate that accountability serves different purposes depending on the type of relationship in which it occurs, we argue that agencies presumably have different incentives to seek accountability depending on the audience. For this reason, we suggest *that the type of audience to whom the voluntary account is rendered is a key explanatory factor as to why specific mechanisms become activated*. This chapter next explores and elucidates which mechanisms in particular are relevant for specific types of audiences. Our analysis relies predominantly on 15 interviews with top-level managers working at EU agencies (of which 10 interviews with executive directors), supplemented with data from 75 survey responses across 39 agencies. This research was guided by the following research question: To what extent do the mechanisms advanced in the literature (or others still) spur organisational accountability-seeking behaviour towards different types of audiences?

This study makes two contributions. First, it uncovers *the audience* as a crucial factor that helps account for varying dominant rationales underpinning accountability-seeking. This makes us see the literature on organisational accountability behaviour in a new light. The findings reveal that voluntary accountability should be understood as driven by a mixture of complementary mechanisms, whereby the dominance of a specific mechanism is *conditional on the type of audience and the resources they can bestow upon the agency*. Second, this study contributes to the literature by exploring organisational accountability-seeking behaviour of multiple agencies towards multiple audiences. It does so by adopting a largely qualitative design which provides insights into *why* certain mechanisms are associated with specific types of audiences. Moreover, a qualitative approach can 'address the question of whether there are still other causal mechanisms at work' (Koop, 2014, p. 579) beyond those documented by existing empirical studies.

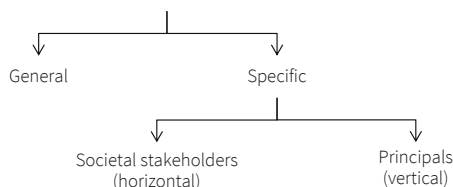
3.2 VOLUNTARY ACCOUNTABILITY: DEFINITION AND POSSIBLE RATIONALES

While accountability is traditionally understood as an obligation (Bovens, 2007; Mulgan, 2000; Strøm, 2000), actors may also explain and justify their conduct without being obliged to do so. When accountability is self-imposed rather than mandated externally, this is referred to as voluntary accountability (Koop, 2014, p. 565). Conceptually, voluntary accountability can be understood as *a relationship between an account-giver and an engaged account-holder, in which the account-giver voluntarily commits itself to offering information on, and explanation of, its conduct and may face consequences* (de Boer, 2021).

Agencies have been found to render voluntary accounts to a variety of audiences, including members of parliament, political executives, external reviewers, clients/users, peers, citizens, interest groups and the media. To make sense of the multiplicity of audiences, we propose a typology that allows us to systematize this literature further. Our typology consists of two main categories: general audiences or specific audiences (see Figure 3.1). First, accountability-seeking towards a *general audience* involves the explanation and justification of one's conduct towards a *wider, often unknown, public*. It can be thought of as “*a message in a bottle*” because the account-giver voluntarily provides information about its conduct without knowing in advance who – if anyone – will actually use this information to scrutinize the account-giver. This type of voluntary accountability has been propelled by innovations in information and communication technologies. These days, many agencies use websites, social media and other forms of public communication to render account to society at large.

Second, voluntary accounts can be geared towards a *specific, explicitly targeted audience*. Within the category of specific audiences, one can further distinguish between *horizontal audiences* (societal stakeholders) and *vertical audiences* (principals). Voluntary accountability towards societal stakeholders – that is, horizontally – often entails inviting a selective group of organisations and/or individuals to scrutinize the conduct of the organisation and to provide feedback. Examples include voluntary external reviews, consultative forums, client councils and user panels. Such practices are often referred to as horizontal accountability in the literature because of the non-hierarchical relationship between account-givers and account-holders (Schillemans, 2011). For instance, accountability to societal actors is referred to as a prototypical example of horizontal accountability in seminal public administration literature on accountability (Bovens, 2007). This differs from voluntary accountability geared towards principals, such as in the case of requests for parliamentary hearings (Busuioc, 2013). The relationship between agencies and their principal(s) is hierarchical in nature as principals formally wield power over agencies (Bovens, 2007, p. 460). For this reason, accountability towards principals is also referred to as vertical accountability.

■ **Figure 3.1: Types of audiences**



3.2.1 POSSIBLE RATIONALES BEHIND ACCOUNTABILITY-SEEKING BEHAVIOUR

As mentioned in the introduction, scholars have identified multiple rationales behind accountability-seeking behaviour. An important part of the debate revolves around adjudicating between the logic of appropriateness and the logic of consequence. The logic of appropriateness entails that actors act in accordance with ‘internalized prescriptions of what is socially defined as normal, true, right, or good, without, or in spite of calculation of consequences and expected utility’ (March & Olsen, 2011, p. 480). Koop (2014) argues that voluntary accountability can be regarded as based on this logic because voluntary account-giving ‘does not have clear advantages for the organizations that render account’ (p. 567). Specifically, Koop (2014) contends, on the basis of sociological institutionalism, that public agencies are embedded in highly institutionalized environments which prescribe accountability as an important rule of appropriate behaviour. Public agencies have internalised the idea that being accountable is a desirable state of affairs – something that they should strive for in order to meet the principles of good governance and democracy. Thus, this norm-based rationale can be called *democratic motivations*. Additionally, Koop (2014) has suggested that agencies may also commit themselves voluntarily to accountability as to prevent the implementation of stricter legal provisions. Such *pre-emptive strategy motivations* seem consistent with consequentialist thinking, as this argument rests on the idea that accountability-seeking behaviour follows from a calculation of expected costs and benefits of two potential outcomes: voluntary account-giving versus more stringent mandatory accountability.

Karsten (2015) has argued against the proposition that account-giving is necessarily disadvantageous for the account-giver. According to Karsten (2015), seeking accountability can very well be rational, opportunistic, self-interested behaviour in some situations. Consequently, actors may render voluntary accounts because of *political-strategic motivations* rather than normative beliefs or legislative threats. He demonstrates the validity of this argument through a study of political executive leaders’ accountability behaviour. He discerns six motivations in total, falling both within the logic of appropriateness and the logic of consequences.

Other proposed rationales cannot easily be classified as either the logic of appropriateness or the logic of consequences (see Goldmann, 2005, for a critique on the analytical distinctiveness of the two logics of action). One of these rationales is *learning*. On the one hand, learning motivations can be seen as following from the logic of appropriateness. Public institutions may feel compelled to foster learning through accountability in order to achieve desirable goals, such as improving the quality of policies or increasing client satisfaction (Bovens et al., 2008; Schillemans, 2011). On the

other hand, enhanced learning through accountability also serves the interests of the account-giver. Many agencies are dependent on information held by actors in their environment and establishing accountability processes towards them can help to satisfy agencies' informational needs (Arras & Braun, 2018).

Still others have pointed at the importance of account-giving for maintaining a positive reputation (Busuioc & Lodge, 2016, 2017; Doering et al., 2021). These authors stress that account-giving is instrumental for building *audience support* and tracking and managing the expectations of *audiences*. This is crucially important for sustaining (regulatory) power and gaining autonomy and may even function as a counterforce against the influence of principals (Carpenter, 2010b). While this literature tends to assume self-interested, rationally acting actors (Maor, 2020), actors may – in line with the logic of appropriateness – also regard reputation as an intrinsic value. As noted by Busuioc and Lodge (2016, p. 250, emphasis in original), reputation-informed behaviour 'is not necessarily always strategic. Actors can come to internalize audience expectations, and to this extent, the relationship can come to be *constitutive*.'

3.2.2 MAKING SENSE OF MULTIPLE RATIONALES

Building further on the valuable insights from existing studies, this study attempts to make sense of the multiplicity of rationales documented in the literature. Specifically, this study looks at the *role of audiences*. There are several cues in the literature indicating the potential relevance of audiences as a factor that could explain when a particular mechanism, or a combination thereof, prevails. First, a consistent finding is that accountability has different functions and leads to different outcomes depending on who is at the other end of the relationship (Bovens et al., 2008; Willems & Van Dooren, 2012). As agencies can choose the audience themselves when accountability is voluntary, they have control over the most likely function/outcome of the accountability they engage in. Consequently, an agency will presumably seek accountability towards an audience that best fits with the agency's motivation. Second, empirical studies have examined different relationships – for instance, agencies and society at large (Koop, 2014), agencies and societal stakeholders (Schillemans, 2011), municipalities and their peers (Doering et al., 2021) and political executives and citizens/councillors (Karsten, 2015) – and found different dominant mechanisms. Consequently, the multiplicity of dominant mechanisms identified in the literature could be an artefact of the different relationships – and, relatedly, different practices – that have been researched.

Based on these two arguments, we hypothesize that it is reasonable to *expect that agencies seek accountability to different audiences for different reasons*. Although this study is largely explorative in nature, we formulate tentative expectations to guide the analysis. First, we expect *democratic motivations* and *pre-emptive strategy motivations* to drive voluntary account-giving towards *general audiences* in particular. *Democratic motivations* are likely to drive voluntary account-giving towards the general public because this type of accountability establishes a direct relationship between the agency and citizens, allowing citizens to bypass the hierarchal chain of accountability and directly hold public officials accountable (Bovens et al., 2008). In the context of EU agencies,

this relationship can take a more symbolic form as few citizens actually engage with EU agencies. The absence of a strong, integrated European media landscape makes it difficult for EU agencies to reach citizens with information, as well as for citizens to use their “voice” as an instrument for holding EU agencies accountable (Papadopoulos, 2010, p. 1034). Nevertheless, EU agencies may feel morally obliged to act transparently and in an accountable manner because this is widely regarded as appropriate behaviour in modern democracies. Hence, they may perceive account-giving to society as a democratic duty (Olsen, 2013), regardless of the degree to which citizens actually engage with their work. Furthermore, EU agencies with *pre-emptive strategic motivations* will presumably sign up for low-cost, yet visible, practices that are typically geared towards general audiences such as maintaining a website, issuing press releases or publishing a newsletter. Faced with a legislative threat, agencies may adopt such practices to do just enough to prevent their principals (politicians) from introducing resource-heavy, statutory provisions, while at the same time limiting the costliness of their self-imposed commitment to accountability (Koop, 2014).

Second, *voluntary account-giving towards vertical audiences* (principals) is expected to be driven by *political-strategic motivations* in particular. Although agencies operate autonomously from their principals to some degree, principals can still exert influence and control over important agency decisions in various ways. Like the political executive leaders who render voluntary accounts towards municipal councillors to get controversial decisions approved (Karsten, 2015), agencies may see voluntary account-giving as a political-strategic instrument that can be used to increase the probability that principals take favourable decisions regarding their functioning and the allocation of resources. In line with this argument, Busuioc (2013, p. 130) has suggested – in the context of voluntary account-giving by EU agencies towards the EP – that ‘an explanation for agency initiatives of voluntarily approaching the EP and embracing new practices of informing and account-giving is their eagerness to raise their profile with the EP as a way to enlist parliamentary support at the budgetary phase.’ In other words, strengthening accountability relationships with principals may come with benefits in terms of being favoured financially or otherwise and these benefits may outweigh the costs of additional scrutiny, time investments and possible negative consequences. EU agencies have multiple principals (the EP, the Council of the EU and the European Commission (EC)) and we expect voluntary accountability towards such audiences to be initiated for political-strategic motives.

Third, in the case of *voluntary accountability towards horizontal audiences* (societal stakeholders), it can be expected that *learning motivations* and *reputational motivations* are the main driving forces. In both cases, the agency needs to engage with a specific (set of) stakeholder(s), either those who hold useful information or those who the agency considers to matter for its reputation. In the case of *learning motivations*, agencies will presumably gear their voluntary accounts towards *selective societal stakeholders* with expertise and vested interests in the domain of the agency, as they can provide high-quality information and valuable feedback. Furthermore, *reputational motivations* can also be expected to drive accountability-seeking behaviour towards societal stakeholders as a central notion in reputational theory is that sustaining support from diverse, yet electorally-relevant audiences empowers agencies vis-à-vis their principals (Busuioc

& Lodge, 2017; Carpenter, 2010b). Account-giving can help agencies to track the expectations, and to manage the perceptions, of those audiences whose support sustains agency (regulatory) power and autonomy. Carpenter's historical account demonstrates how the cultivation of positive audiences with a multiplicity of electorally-relevant, politically cross-cutting audiences (i.e., swing groups) can lead principals to have to re-think their stance on agency programmes (Carpenter, 2001). Potter (2019) too, demonstrates how agencies "expand the participation valve" to include specific groups – when these are *supportive* of agency programmes. They will increase for instance, the comment period when the concerned interest groups are in "the agency's corner" (Potter, 2019, p. 122). Such efforts are *targeted* rather than indiscriminate.

Theoretically, our general claim is that voluntary accountability should be understood as a relational concept, meaning that accountability is essentially co-produced by the actor *and* its audiences. As audiences differ in important respects, understanding the drivers of voluntary accountability requires attention to the relationships that actors seek to cultivate by committing to a particular type of accountability. Hence, taking the audience of voluntary accounts into consideration, we argue, might help to reconcile seemingly contradictory theoretical claims about what explains voluntary accountability. This leads us to theorize about the driving mechanisms of voluntary accountability at the level of accountability *relationships*. When the audience is *specific*, voluntary account-giving can help to secure important organisational resources from particular audiences: information/feedback from societal stakeholders in the case of *learning motivations*, a good image among societal stakeholders in the case of *reputational motivations* and budget/tasks from principals in the case of *political-strategic motivations*. Furthermore, we expect *democratic motivations* to lead to account-giving towards *non-specific* audiences because of the strong connotation of this type of voluntary accountability with democratic principles, such as transparency and freedom of information. Finally, *pre-emptive strategic motivations* are expected to drive voluntary account-giving towards *non-specific* audiences too, because the high visibility of this type of voluntary accountability is presumably most effective against legislative threats.

3.3 RESEARCH STRATEGY AND DATA

To explore the mechanisms driving accountability-seeking behaviour, we collected data from top-level managers of EU agencies. EU agencies are a relevant case because previous research has shown that EU agencies engage in accountability-seeking behaviour towards general audiences (Wood, 2018) as well as specific audiences, both horizontally (Arras & Braun, 2018; Busuioc & Jevnaker, 2022) and vertically (Busuioc, 2013). In other words, the main advantage of selecting EU agencies relates to the reasonable expectation derived from previous research that they render *voluntary* accounts, and that they do so towards all three types of audiences.

We draw on both in-depth, semi-structured interviews as well as qualitative and quantitative data collected through a survey. The study is, however, predominantly qualitative in nature. As noted by Koop (2014, p. 574) this type of research is needed to better understand what drives voluntary accountability: 'Further research of a more qualitative nature will be needed to provide

an answer to the question of the causal mechanism' that drives accountability-seeking behaviour. Our qualitative data is supplemented with quantitative data collected via a survey as to gauge the "size" of the phenomenon at hand.

We followed a purposive sampling approach for the selection of the interviewees. We focused our sample on top-level managers given that, as managers at the peak of organisational hierarchies, they will have a birds-eye-view about the various accountability initiatives undertaken by their agency. As Yang (2009) writes, 'organizational reporting is usually a decision made by a collective of top managers or the leadership team' (p. 84). Specifically, we aimed to speak with executive and deputy directors, as we expected them to be in the best position to have a comprehensive overview of their agency's account-giving practices. Upon our invitation, some agencies proposed an interview with another member of the organisation (e.g., internal auditor). Consequently, some interviews were held with persons that are not an executive director or a deputy director (see Table 3.1 for more details). We conducted 15 interviews (with a total of 18 respondents) – face-to-face, via a video connection or over the phone. Out of these, 10 interviews were with executive directors. The interviews were carried out between October 2019 and March 2020 and lasted approximately 60 minutes on average. All interviews were recorded and transcribed *verbatim*.

In the interviews, we asked interviewees to provide *examples of initiatives taken by his/her agency to explain and justify its work beyond legal requirements*. This question stays as close as possible to the agreed-upon academic definition of accountability, which, in its simplest form, can be defined as 'explanation and justification of actions and decisions' (Michels & Meijer, 2008, p. 168) – ensuring consistency with the dominant understanding of accountability. We deliberately aimed to steer respondents away from talking about practices that may – *but do not necessarily* – lead to accountability. It is well-established in accountability literature that transparency is a necessary but not sufficient condition for accountability. Only when this information actually is taken up by a forum leading to explanation and justification do such practices qualify as genuine forms of accountability (Bovens, 2007, p. 435). Moreover, the framing is consistent with prevailing accountability frameworks that posit that not sticking to the 'narrow' definition of accountability can easily lead to conceptual stretching (Bovens, 2007; Mulgan, 2000). Our follow-up questions about the rationales for seeking accountability focused explicitly on the examples mentioned by the respondent. This prompted the respondent to reflect on a concrete, real-world initiative that is, according to academic standards, considered as accountability. Importantly, this setup limited the influence of respondents' individual perceptions of accountability on the results, without determining *a priori* which specific practices constitute voluntary accountability.

■ **Table 3.1 Description of respondents**

Data source	Total (No. of agencies with a regulatory task)	Organisational position				
		Executive	Deputy	Administrative	Operational	Other
Survey	75 (42)	18	4	19	30	4
Interview	15 (9)	10	1	0	0	7

We collected survey data in parallel with the interviews. The purpose of the survey was two-fold. First, it provides a *quantitative* estimate of the extent to which EU agencies actually render voluntary accounts to various audiences. To this end, survey respondents were asked to score their agency's accountability-seeking behaviour towards a variety of audiences: "the media", "the general public", "major corporations", "interest groups", "European Commission", "European Parliament", "Council of the EU" and "Management Board". Second, the survey allowed us to corroborate and supplement the interview insights with additional observations from a broader pool of agencies. To this end, each survey respondent was asked, in a series of open-ended questions, to provide an example of an accountability initiative taken by his/her agency and subsequently to state the main motivation behind this initiative. The survey was disseminated to a total of 220 public officials from 45 EU agencies. In total, 75 public officials from 39 different EU agencies completed the survey, which amounts to a response rate of 34,1%.

3.3.1 CODING AND ANALYSIS

All qualitative data (from both the interviews and the survey) was coded and analysed in Atlas.ti. The coding process involved the coding of three sorts of information: the type of accountability initiative, the motivation behind it and the type of audience to whom the account is rendered. First, *accountability initiatives* were coded inductively in order to get a sense of the practices through which, according to EU agency leaders, EU agencies seek accountability. Second, *motivations* were coded in a three-step process of open coding, axial coding and selective coding. This *abductive* process allowed us to remain open to new mechanisms not yet documented in the literature and to be sensitive to discrepancies due to contextual differences, while also benefiting from existing knowledge. In order to assess the reliability of the final coding scheme for the coding of *motivations*, another researcher was asked to independently code the qualitative data using a pre-defined codebook. Krippendorff's alpha is 0.689, which is considered acceptable. Third, the coding of the *types of audience* was based on three predefined categories (i.e., general audiences, specific societal stakeholders and principals), in line with our typology.

This largely inductive approach is tailored to the study's main aim, which is to assess to which extent specific mechanisms behind voluntary accountability are linked to specific types of audiences. Simultaneously, it aims to complement existing studies that have used fixed coding schemes to map and analyse voluntary accountability practices (e.g., Busuioc & Jevnaker, 2022; Koop, 2014; Wood, 2018). Our approach adds to these studies in two ways. First, it provides a check on whether we – as public administration scholars – are actually studying the "right" practices. Studies using a fixed coding scheme need to make assumptions about what counts

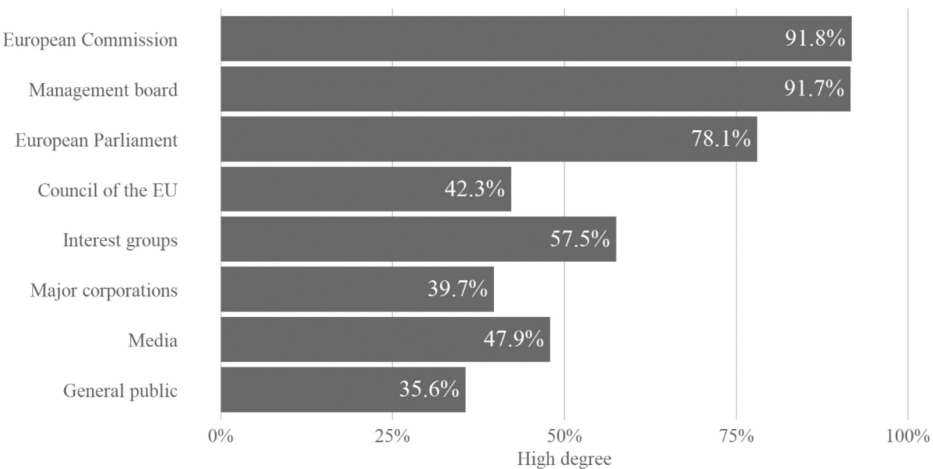
as voluntary accountability and what does not. Our approach provides insights into what kind of practices agency leaders *themselves* consider to be important practices/instruments for rendering voluntary accounts. Second, it allows us to analyse many different forms of accountability-seeking behaviour at the same time – even including practices that have not yet been discussed in the literature in terms of accountability.

Respondent numbers will be used in the text as to preserve the anonymity of the respondents. Each respondent number is composed of a first number corresponding to a particular agency and a second number corresponding to a particular respondent.

3.4 ACCOUNTABILITY-SEEKING BY EU AGENCIES

To start, the quantitative data from the survey gives insight into the direction of voluntary accounts and EU agencies' chosen interlocutors. Figure 3.2 displays the percentage of respondents that say their agency seeks accountability to a high degree. A "high degree" is defined here as answering 4 ("much") or 5 ("a great deal") on the question: 'To what extent does your agency take initiative to explain and justify its work beyond legal requirements to representatives of the following actors?'. This question was measured on a five-point Likert scale. Our findings indicate that respondents view the EC and the Management Board as the most important targets of voluntary accounts. Over nine out of ten survey respondents indicated that their agency seeks accountability to these two institutions to a high degree. Far less survey respondents (approximately one-third) say the same thing when it comes to accountability-seeking towards the general public. To some extent, the low score for the general public may be the result of asking respondents about explanation and justification instead of transparency/openness. Nevertheless, accountability at its core relates to explanation and justification, which according to the survey results, is something that few respondents believe their agency undertakes vis-à-vis the general public.

■ **Figure 3.2: Accountability-seeking to whom?**



It is also interesting to see *how* voluntary accounts are rendered. The analysis of the qualitative data – both from the survey as well as the interviews – resulted in the classification of 29 different accountability initiatives in total. Table 3.2 displays which initiatives were most often mentioned by respondents from different EU agencies. Voluntary account-giving occurs, according to EU agencies covered by this study, by and large, through EU agencies’ everyday activities. *Informal meetings/contacts* and *public events/conferences* were mentioned most frequently (both 17 times). *Social media* (ten times) and *websites* (eight times) are two online practices that were frequently given as an example of voluntary accountability.

It should be noted that the data presented in Table 3.2 has not been generated from a random sample and as such these numbers should not be taken to be representative of the whole population of EU agencies. Still, the general pattern is illuminating – painting a picture of what EU agency leaders think of when asked about voluntary accountability. First of all, the data suggests that most respondents in our sample believe that their agency enacts voluntary accountability through conventional bureaucratic practices rather than through engaging in novel initiatives that would require spending much additional resources (e.g., consultative forums, voluntary external reviews, client satisfactions surveys). Second, it indicates that, according to EU agency leaders themselves, a wide variety of practices can contribute to accountability. Importantly, many of these practices can be regarded as a “light” version of voluntary accountability – they entail a strong component of information provision, but do not necessarily contribute directly to debate or the formation of judgements. Note that this data does not tell us how many EU agencies have adopted a certain practice as the same tool (e.g., a website, social media) may be used/perceived as an accountability instrument by some EU agencies, but not by others. Instead, it tells us what respondents believe to be the most important voluntary practices that make their organisation more accountable towards a particular audience. In the next section, we address what motivates EU agencies to render voluntary accounts through these practices.

■ **Table 3.2 Overview of accountability initiatives mentioned by respondents**

Description	Count
Informal meetings/contacts	17
Public events/conferences	17
Social media	12
Presentations	10
Workshops/seminars	10
Website	8
Publications	5
Site visits	5
Other	51

3.4.1 WHEN DOES WHAT MECHANISM PREVAIL?

With regards to the drivers behind these practices, our investigation resulted in five distinctive motivations. Out of these, three have been identified by previous studies: reputational motivations, democratic motivations and learning motivations. Additionally, we found two motivations that, to the best of our knowledge, have not been explicitly documented in relation to voluntary accountability before: financial motivations (which may be considered a specific form of political-strategic motivations) and effectiveness motivations.

Table 3.3 shows the five motivations identified in the data and how often they were mentioned *per agency* in relation to a specific type of audience. This co-occurrence matrix tells us, first of all, that reputational motivations and effectiveness motivations appear most often in the data. In total, these motivations account for over 70% of all motivations mentioned by the agencies included in this study. Second, it is noteworthy that, judging from the co-occurrence matrix, agencies' motivations are linked to audience types. While two motivations seem to be significant drivers of accountability-seeking behaviour *across audiences* (i.e., reputational motivations and effectiveness motivations), the other motivations are not. The next three sections tell the story behind these numbers for each type of audience and give detailed insights into why certain mechanisms are associated with specific types of audiences.

■ Table 3.3 Co-occurrence matrix

	Descriptions of goals of accountability-seeking behaviour*	General audiences	Specific		Total
			Societal stakeholders	Principals	
Reputational motivations	• Seeking diverse audience support • Tracking and managing audience perceptions • Showcasing successes	12	10	14	36
Effectiveness motivations	• Realizing policy implementation • Performing tasks required to fulfil one's mandate	6	9	18	33
Democratic motivations	• Demonstrating the good use of public money • Meeting the principles of good governance	11	0	3	14
Learning motivations	• Improving the quality of policies/decisions • Fostering organisational learning through feedback	0	7	1	8
Financial motivations	• Lobbying for a higher budget	2	0	4	6

* Some descriptions are taken from Karsten (2015).

3.4.1.1 General audiences: “Message in a Bottle”

Two motivations are particularly dominant drivers of accountability-seeking towards general audiences. A first strand of dominant motivations relates to *reputational* considerations. Respondents expressing this kind of motivation emphasize how voluntary account-giving can contribute to greater *audience support* for their own organisation and its activities. For instance, one EU agency uses social media ‘to get more political support from citizens, beyond the sector players and stakeholders’ (respondent 23.3). In a similar vein, another respondent noted that voluntary account-giving to the general public helps to ensure ‘a good acceptance in the public’ (respondent 6.1). Cultivating one’s reputation among a broad audience matters for a variety of reasons, although not all reasons are equally important for all agencies. For instance, the visibility gained by being accountable to society at large may be particularly welcoming for regulatory agencies that need to demonstrate their credibility. As one respondent explained:

Media is important to disseminate our products, deliverables or outputs. For visibility. And to increase the credibility as a centre of expertise at the European level. Because if we will do our work in the shadow, still we might be effective, but we might have less support. (respondent 22.2)

While most accountability initiatives are taken proactively, some respondents mentioned instances where voluntary account-giving towards general audiences was rather used as a reactive, defensive mechanism. These respondents stressed that it allows them to counter public criticism, avoid blame and offset principal control. That is, these agencies resort to rendering voluntary accounts in situations where the reputation of the organisation is threatened by negative coverage in the media or by public criticism. For instance, one agency gives ‘[r]egular interviews in [the] press’, which are seen as a platform for ‘[c]omplementing or countering information from other sources’ (respondent 15.1). This kind of motivation reiterated multiple times by respondents from different agencies:

[We are] being blamed or being mentioned for certain things. Where you feel, (...) I need to explain under this particular issue who does what. And if you break it down - who does what - you might find out that there was no [agency] important operation (...) involved in this whole thing that you have. So, sometimes [an issue] can be in need of further explanation in order to get it right. (respondent 33.1)

Such blame-avoidance strategies – for instance providing additional information on websites – become relevant also to disperse principal-critique:

We have some statistics on our website, so that one can see what types of companies are involved. It’s our intention to be as transparent as possible with the public [about that]. (...). We always have people in [political] parties, even whole [political] parties in the European Parliament, who are against everything what industry does. So, if we were fulfilling this image that we only feed the big players in Europe (...), then we would also give them arguments to just have negative statements. Which they have in any case, but we want to present ourselves here also in a positive way. (respondent 6.1)

The quotes above indicate that voluntary account-giving does not necessarily serve the provision of unbiased information. At least some respondents view it as a tool for selectively showcasing organisational successes or dispelling public criticism and principal-critique.

The other strand of dominant motivations relates to the normative, democratic aspect of accountability. Respondents expressing *democratic motivations* emphasize that public sector organisations have a duty or responsibility to act in a transparent and accountable way. They feel that EU agencies – as public institutions operating in a democratic polity – ought to explain in simple language what they do and how it impacts the lives of ordinary citizens. Respondents using this kind of argumentation often contended that EU agencies should strive towards enhanced accountability in particular given that EU citizens are often not aware of the working of the EU and its agencies. In the words of two respondents:

We are cooperating also with the media on the general question: What is the agency doing? Because there we see our responsibility, also in the matter of accountability. There's still the gap between what people know and what people should know about what kind of services are provided within the European level. (respondent 5.1)

We had a day of open doors, where we got surprisingly many citizens coming [and] asking us questions. So, we can really sell the idea of Europe. It's a way of closing the loop back to the citizens. (respondent 23.1)

3.4.1.2 Specific Audiences: Societal stakeholders (horizontal relationships)

Accountability-seeking behaviour towards societal stakeholders appears to be driven by a different set of motivations. First, there is, as with accountability-seeking towards general audiences, a strong *reputational* component to it. For instance, respondents pointed out how accountability serves to track and manage audience expectations – a key element to reputation building. Specifically, it serves to gain a better understanding of what different segments within society expect them to do. This understanding is vital for meeting their stakeholders' expectations as well as to anticipate potential criticism. As one respondent explained:

Our stakeholders have strong, and often opposing, interest[s] towards our work. It is important that they understand how we work, and that we understand their expectations. (respondent 12.1)

And reiterated by the other respondent:

We collect their feedback on the way we work, on the issues that we focus our attention on, on what their expectations are, and how we can meet them in terms of what we do, and also how we work. (respondent 16.1)

Second, respondents stress the importance of *learning* through direct interactions with societal stakeholders. Such interactions often yield valuable feedback that can be used to improve the quality and relevance of outputs. In the words of two respondents:

We organize special events and special meetings for [our stakeholders] in order to make sure that they keep us on our toes. (respondent 25.1)

It's important to know your product and the target audience. And that's why we have validation workshops (...) to ensure that our products are relevant to them. So, this is a form of accountability. (respondent 22.2)

Interestingly, learning motivations and reputational motivations appear to go together very well as they co-occur a couple of times in the data. For instance, the respondent quoted above stressed not only the importance of being relevant for the agency's stakeholders, but also linked the validation workshops to securing stakeholders' approval of agency decisions. The respondent said:

All public administrations are very risk averse. So, every time we take a decision, we need to ensure that we have the proper validation processes and to have the approval of stakeholders through these processes. (respondent 22.2)

This can be interpreted as a reputational motivation because it is often reputationally costly for an agency to take a decision that its key stakeholders disapprove (or even worse, to reverse a decision due to limited support from stakeholders). As explained by the respondent, the validation workshops help to secure the approval of stakeholders before a decision is made, allowing the agency to keep up an appearance of consistency and to prevent reputationally-costly ex post reversals.

The same combination of learning motivations and reputational motivations can be gleaned in another interview in which the respondent talked about voluntary audits by users. These audits produce learning stimuli and actionable feedback: 'Depending on the outcome, we act' (respondent 25.5). Yet, the respondent mentioned simultaneously a clear reputational consideration behind this initiative:

If [users] disagree with something, you will see it the next day in the press. It's very immediate. It affects our day-to-day business and we are very glad that we can do this together with our users. (respondent 25.5)

Thus, by inviting users to directly provide feedback to the agency's management, it is expected that they are less inclined to express their criticism publicly in the press. This is an illuminating example of how learning and reputation are interlinked. The voluntary audits foster organisational learning and simultaneously reduce the reputational risks of lessons being learnt in public.

3.4.1.3 Specific Audiences: Principals (vertical relationships)

Accountability-seeking towards principals (the EP, the Council of the EU and the EC) appears to be driven by a mixture of effectiveness motivations, reputational motivations and financial motivations. First, voluntary account-giving towards principals is seen as a prerequisite for effective policy implementation. Respondents expressing *effectiveness* motivations argue that voluntary account-giving is unavoidable in a healthy, functional working relationship with principals. Many agencies can only be effective when national governments in the Council of the EU, the EC's policymakers and/or Members of the EP (MEPs) use their expertise and recommendations. Agencies must therefore cooperate closely with those on whom they are dependent in order to fulfil their mandate and deliver on established goals. Such cooperation, whether it is in a network or bilateral, often includes practices that are perceived as accountability. Asked about the reason behind voluntary account-giving towards the EC, one respondent said, for instance, that they 'simply work together. On certain issues, we join forces (...) for the common results to be delivered' (respondent 33.1). Another respondent indicated that voluntary account-giving to the EC ensures 'effectiveness of EU approach' (respondent 23.2). In a similar vein, one respondent said about an agency-initiated presentation of a report in the EP:

It's a way of disseminating the information to the policymakers. And that's part of our mandate, to appropriately inform policymakers. (respondent 14.1)

Second, *reputational* motivations are an important driver of voluntary account-giving towards principals as well. One respondent, for example, explained his desire to more frequently present the agency's work to the parliamentary committee overseeing his agency as follows:

Well, I mean it is primarily a question of understanding and of the reputation of the agency. I mean, like let's say a private company operating on the market, reputation is important. (respondent 25.1)

And again:

That's why we go to the Parliament. If we have something very strong to present, like the [name of report], it makes sense to present it. To attract attention. (respondent 14.1)

Third, the data suggests that influencing financial decisions is also a significant driver of voluntary account-giving to principals. Many respondents feel that EU agencies must live up to ever-increasing expectations, while lacking the necessary financial resources to deliver the expected results. For instance, one respondent lamented that Member States 'are asking us to do more, but they want to cut our resources' (respondent 7.1). According to another respondent, the heavy financial constraint on EU agencies has led to a 'budgetary game', meaning that EU agencies 'need to convince the European Commission and the budgetary authority to give eventually more money than the [budgetary] ceiling' (respondent 26.1). Consequently, EU agencies compete with each other over scarce financial resources. In the words of one respondent:

The [European] Union budget is under severe strain from the Member States who don't want to pay into the [European] Union's budget. And through that, there is an immense competition on resources. And, therefore, it's much more likely that any individual entity will get cut than it will happen to be in the political spotlight and be favoured. (respondent 12.1)

Respondents stressed that the decision-making process about budget allocation happens in a political context. It is therefore ultimately 'a question about visibility' (respondent 22.2). While some respondents considered the visibility of the agency to be outside the agency's zone of influence, others thought that budgetary decisions could actually be influenced by proactively explaining and justifying the work of the agency to those institutions that decide on the allocation of resources. These respondents would make a connection between the competition for resources and seeking to give account towards the EP, the EC or the Council of the EU:

The EU institutions are those who decide on the resources allocated to the agency. So, it's in the interest of the agency to demonstrate accountability and transparency towards them, to demonstrate the value of the work that we deliver for the EU, for European citizens, for the Member States. (respondent 26.1)

The Council [of the EU] takes the decision about our budget. And it would make more sense that we will be able to go there to explain what we are doing and speak with Member States on their point of view. (respondent 35.1)

3.5 DISCUSSION: THE ROLE OF AUDIENCES FOR UNDERSTANDING ACCOUNTABILITY-SEEKING BEHAVIOUR

The above analysis suggests that our understanding of the drivers of accountability-seeking behaviour can be enhanced when taking the direction of voluntary accounts into consideration. Concretely, we find that accountability-seeking behaviour is driven by a mixture of five distinctive, yet complementary, motivations. Two of these (i.e., reputational motivations and effectiveness motivations) are important drivers across audience types, although effectiveness motivations were mentioned relatively more frequently in relation to voluntary accountability towards principals. The three remaining motivations diagnosed in this study (i.e., democratic motivations, learning motivations and financial motivations) are linked to voluntary account-giving towards specific types of audiences.

Reputational motivations were mentioned most often by different agencies. While this cannot be interpreted as indicative of the pervasiveness of this rationale over other motivations, it does suggest that reputational considerations play a non-negligible role in driving voluntary account-giving behaviour. Contrary to our expectation, this motivation was mentioned regardless of what type of audience is involved. The empirics indicate that voluntary account-giving is considered to yield reputational benefits in two ways (see Müller & Braun, 2021, for similar evidence in the case of the European Central Bank). On the one hand, it allows agencies to *proactively* construct

a favourable narrative about the organisation's capacities and competences (Busuioc & Lodge, 2017). As noted by Black (2008, p. 151), 'to give account is to construct and present a narrative of past events or actions.' It appears that the respondents agree with this characterization of accountability. As voluntary accounts can be rendered on one's own terms, it provides a great opportunity for narrating about past conduct in the most positive way. On the other hand, the data suggests that a subgroup of the respondents view voluntary account-giving rather as a *reactive*, *defensive* strategy that allows them to develop a counter-narrative in response to public criticism and negative media coverage.

Effectiveness motivations were mentioned only slightly less frequently than reputational motivations. While this motivation has not appeared in previous studies, it can be understood as arising from the institutionalized fragmentation of power and resources that characterizes many regulatory systems (and perhaps the EU regulatory state in particular due to its multi-level structure and the multiplicity of principals). As argued by Scott (2000, p. 50), '[i]nterdependent actors are dependent on each other in their actions because of the dispersal of key resources of authority (formal and informal), information, expertise, and capacity to bestow legitimacy such that each of the principal actors has constantly to account for at least some of its actions to others within the space, as a precondition to action.' In other words, EU agencies may feel compelled to develop ties with external actors who hold key resources that agencies need to act effectively, which, in turn, unintentionally but inevitably, will lead to the development of accountability practices.

In line with our expectations, *democratic motivations* were mentioned in particular when the audience is general. Fully in line with the argument made by Koop (2014), EU agencies feel morally obliged to close the democratic gap between European governance and EU citizens. That is, it is an attempt to communicate transparently about what EU agencies do and why it matters through rendering account via platforms (e.g., popular press, social media, websites) that are typically more accessible for the average EU citizen than mandatory accountability practices. It is interesting to note that there seemingly is not only an increasing pressure for accountability coming from post-representative mechanisms 'monitoring' what government is doing (Keane, 2009), but also increasing appetite within the administration itself to be monitored in the name of democracy.

Learning motivations appear, as expected, to be related predominantly to accountability-seeking towards specific audiences of the horizontal kind (i.e., *specific societal stakeholders*). Although there is plausibly considerable variation between agencies, the data suggests that (at least some) EU agencies need to take decisions on complex issues that directly affect the interests of different societal groups. For these agencies, there is a need to enhance the (perceived) quality of decisions through learning *from* stakeholders and learning *about* their expectations. There is also a clear reputational aspect to this latter motivation. Agencies know that if they do not get it right in the first place and fail to meet their stakeholders' expectations, their decisions could be contested. In other words, learning does not only entail gathering technical, neutral information in order to better understand complex issues. It is also an opportunity 'to interact and track audience expectations' (Busuioc & Lodge, 2017, p. 94). Hence, it can be seen as a strategy of seeking to

enhance the acceptability of decisions and securing support to the agency's line of action (see Moffitt, 2014, for a similar argument in the US context).

Financial motivations are mainly mentioned in relation to voluntary account-giving towards *principals*. While previous empirical studies have not explicitly documented this type of motivation, the observed pattern confirms the proposition expressed by Schillemans and Busuioc (2015). They wrote that accountability 'ascertains that the organization is on the radar of the decisional powers-that-be, which is probably beneficial for allocation decisions on budgets and tasks' (p. 210). Moreover, the financial motivations documented in this study may be considered a particular, context-specific version of the political-strategic motivations observed by Karsten (2015). Like the Dutch political executives, EU agencies view rendering account as a strategy to 'prevent negative sanctions from being imposed, or promote the use of positive sanctions' (Karsten, 2015, p. 695) – financial ones in the case of this study.

We did not find evidence that EU agencies seek accountability to *pre-empt legislative threats*. This driver may be context-specific (cf. Koop, 2014). However, it could also be that this rationale is simply more difficult to document and establish through interviews with agency respondents. An alternative, theory-driven explanation would be that EU agencies rarely get exposed to legislative pressures because such pressures could potentially undermine their formal independence and therefore work against the long-term interests of principals (Thatcher, 2005). Our study cannot confirm or rule out these possible explanations. More research is needed to determine if legislators signal legislative threats to prompt EU agencies to take accountability initiatives.

So, what does this all mean for the existing explanations of accountability-seeking behaviour? We believe that our analysis provides at least three new theoretical insights. First, the results above indicate that there is no general, decontextualized answer to the question what drives accountability-seeking behaviour. While it has been suggested that studying agencies' accountability initiatives 'may help us evaluate competing accounts of agency incentives' (Magill, 2009, p. 862) – i.e., what makes an agency tick? –, this study suggests that there is no holy grail of one set of matching motivations explaining accountability-seeking behaviour by and large. Accountability can perform a variety of functions and agencies have considerable control over the outcome of accountability when account is rendered voluntarily. Consequently, it depends on an agency's specific needs and beliefs whether an agency engages in accountability-seeking behaviour and, if so, which form it takes.

Second, it should be recognized that voluntary accountability – like the general concept of accountability (Bovens et al., 2008; Willems & Van Dooren, 2012) – is a multi-faceted concept, which comprises many different practices that are undertaken in relation to a variety of audiences. As shown above, the audience is an important part of the explanation why specific mechanisms become activated. Consequently, actors' motivations to seek accountability cannot be understood outside the relationship in which the voluntary account-giving occurs. Accountability-

seeking motivations are intimately inter-linked to the relationship actors seek to cultivate and cannot be elucidated in abstract thereof.

Third, while various authors have sought to determine whether voluntary account-giving should be regarded as following from normative prescriptions about appropriate behaviour or consequentialist thinking, this distinction is somewhat a false dichotomy (Goldmann, 2005). As shown above, some motivations comprise elements of both logics of action and it is often difficult to clearly separate them analytically. For example, do agencies wish to improve the quality of their decisions/policies by learning through accountability because they believe increasing public sector performance is inherently good (i.e., logic of appropriateness) or because high-quality decisions are less likely to be resisted and publicly criticized (i.e., logic of consequence)? For these reasons, it is more appropriate to see the logics of action as complementary and overlapping rather than competing and mutually exclusive.

3

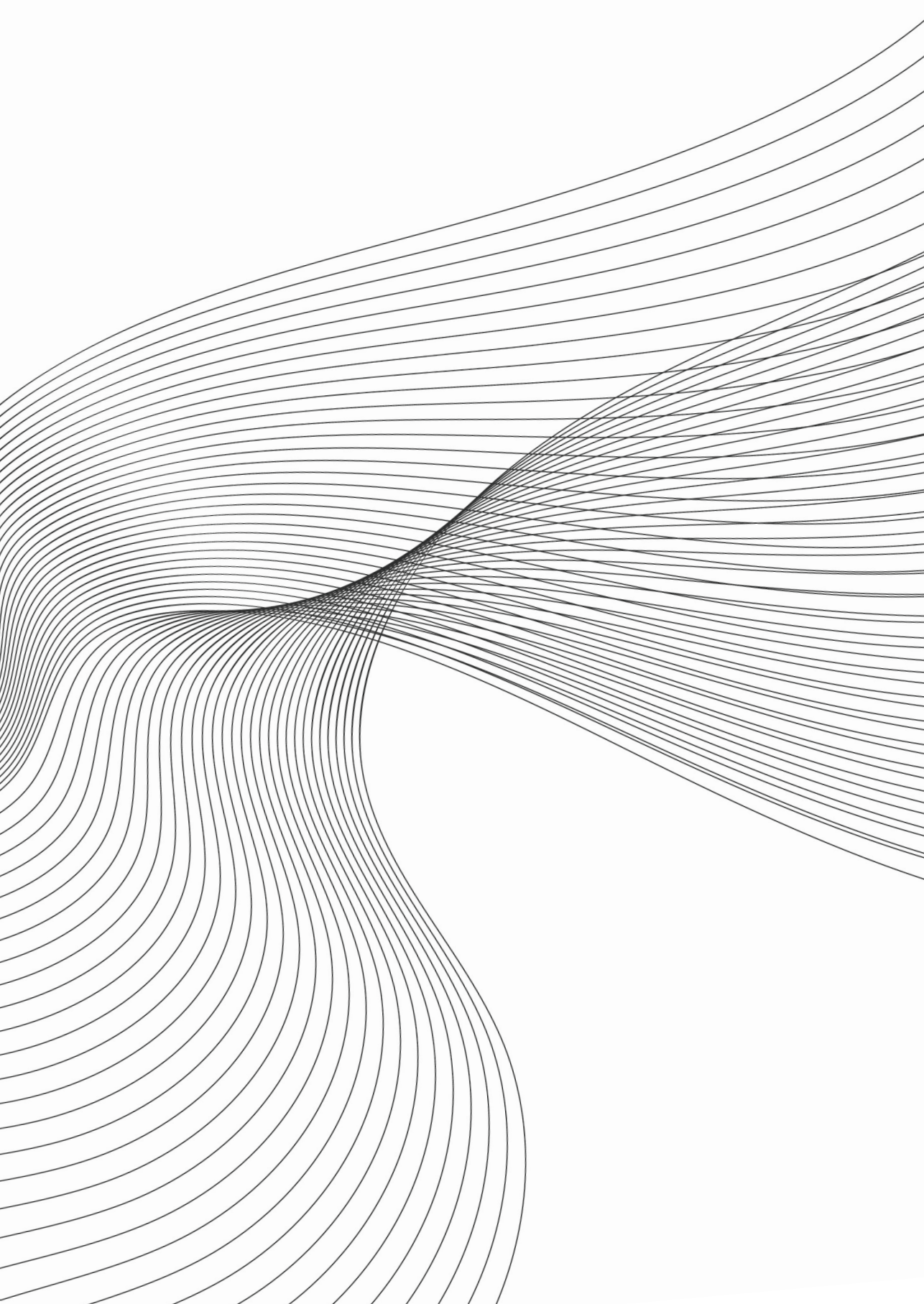
3.6 CONCLUDING REMARKS

In conclusion, this study has shown that agencies render account to different audiences for different reasons. Most importantly, this study shows that there is no single dominant mechanism driving accountability-seeking behaviour. Instead, different motivations, and combinations thereof, lead to accountability-seeking towards different types of audiences. This study helps unpack these motivations and how they link to specific audience types. Moreover, this study has documented two new mechanisms behind accountability-seeking, which we labelled “financial” and “effectiveness”. This finding holds important lessons for modern governance. It indicates that financial stimuli and interdependencies incentivize agencies to commit to voluntary accountability. These two factors could potentially help to advance accountability in modern governance. Furthermore, this study has validated empirically that reputational drivers are important theoretical pieces in the puzzle of understanding accountability-seeking behaviour. While it has been theorized before (Busuioac & Lodge, 2016, 2017), this study has demonstrated empirically the importance of reputational motivations as a driver of agencies’ accountability-seeking behaviour.

The empirical findings originated from a particular research context: the EU. Importantly, the EU differs in some respects from other polities. For instance, EU agencies may be particularly likely to seek accountability as they have been recurrently blamed for suffering a democratic deficit on a par with the EU more broadly. Voluntary account-giving may be a way for EU agencies to compensate for their weak democratic basis caused by their insulation from politics and to proactively manage their legitimacy through reputation (Rimkutė, 2020a). Furthermore, learning may be particularly important for EU agencies as the EU is a prototypical regulatory state (Majone, 1997) in which agencies need to keep up-to-date about the latest developments in order to successfully regulate the complex operations of regulated sectors (Arras & Braun, 2018). Finally, the extent to which agencies seek accountability may depend on the type of administrative system in which an agency operates, as some systems are more legalistic than others – leaving less room for voluntary accountability.

The findings of our study have important normative implications. It has been suggested that horizontal forms of voluntary account-giving can compensate for the loss of traditional accountability caused by the rise of horizontal and multi-level forms of governance (Bovens et al., 2008; Schillemans, 2011). The analysis above indicates that EU agency leaders are generally convinced of the need to take initiatives to explain and justify the agency's work beyond legal requirements, yet they do so by seeking "light" versions of accountability. By and large, respondents mentioned low-cost, rather symbolic initiatives to become more transparent/accessible. Only a few respondents provided examples of practices that stimulate a critical dialogue with stakeholders and/or contain an explicit element of sanctions (e.g., site visits, validation workshops, voluntary audits by users). This suggests that accountability initiatives are sometimes best described as a *presentational strategy* (see Yeung, 2009) rather than an attempt to increase the scrutiny of agency operations.

Although such initiatives, once initiated, can potentially take a life of their own and develop into full-scale accountability practices in the future (Busuioc & Lodge, 2016), this finding raises questions about the extent to which voluntary accountability can legitimize governance through (semi-)autonomous agencies. Further research is needed to assess the effects of different types of accountability initiatives on the legitimacy of public agencies. Future research could also focus on further improving the typology used in this study. While our typology proved to be an effective instrument for mapping, analysing and interpreting EU agencies' accountability-seeking behaviour, more research is needed in order to assess if voluntary accounts are rendered to still other audiences as well as whether the typology travels well in other research contexts. Furthermore, while this research focuses on organisational rationales, further research could investigate the micro-foundations behind the motivations identified in this study as well as the role of individuals in promoting accountability. It would be valuable to learn if organisational leaders have their own rationales for promoting accountability, for instance to address underperformance by motivating staff to ensure performance is up to standards according to external audiences. Alternatively, public managers' willingness to spend time on voluntary account-giving may be partly dependent on the extent to which they identify themselves with the agency. As noted by Carpenter (2010b, p. 47), the force of reputation 'is founded in part upon the force of image, esteem, and self-presentation in individual life.' As organisational identity attributions are more directly relevant for those at the top of organisational hierarchies (Carpenter, 2010b, p. 67), accountability-seeking behaviour may for instance be related to an agency leader's desire to profile herself and/or reflect ways in which individual identity and esteem are shaped by wider social evaluations of the organisation to which one belongs. Finally, future research could move beyond the "speak" of agency leaders and employ methods that would allow one to study how specific accountability initiatives unfold in practice (e.g., ethnographic methods) as well as how voluntary accounts are received by those targeted though such efforts.





CHAPTER 4



A Test of Reputation-Informed Mechanisms behind Accountability- Seeking Behaviour Vis-à-vis Six Different Audiences

This chapter is revised and resubmitted to an international, peer-reviewed journal. This chapter is co-authored with Benjamin Leidorf-Tidå. The author statement can be found in appendix 1.A.



4.1 INTRODUCTION

Accountability is the cornerstone of democratic governance. Consequently, the accountability of EU agencies has received a good deal of attention in academic research (see Busuioc, 2013; Curtin, 2007; Egeberg & Trondal, 2017; Leidorf-Tidå & de Boer, 2022; Maggetti, 2010; Thatcher & Sweet, 2002). Within this rich literature, most empirical studies focus on EU agencies' formal accountability relationships with forums such as management boards (Buess, 2015), non-state stakeholders (Pérez-Durán, 2018), Member States (Buess, 2014), the EP (Font & Pérez-Durán, 2016; Lord, 2011), the EC (Egeberg et al., 2015), as well as the EU "watchdogs" – the European Court of Auditors and the European Ombudsman (Bovens & Wille, 2020; Busuioc, 2013; Tidå, 2022). Such studies have greatly advanced our understanding of the many ways in which EU agencies are held accountable for different aspects of their conduct by a variety of institutional account-holders.

This body of research has resulted in a comprehensive understanding of how the EU has developed over the years into an increasingly 'dense' accountability landscape (Wille, 2016). In this landscape, EU agencies are subject to a myriad of accountability pressures and in many cases there have been calls for even more and/or different kinds of accountability (Olsen, 2013). It has been noted that under such conditions public agencies 'do not need to undergo the rise of public accountability pressures passively; they can to some extent manage them and become accountability entrepreneurs instead of accountability victims' (Bovens, 2005, p. 204). Voluntary account-giving is one of the entrepreneurial strategies that could allow EU agencies to determine their own destiny and shape audience expectations and perceptions with regards to agency accountability (Black, 2008).

In fact, voluntary accountability is a well-documented phenomenon among EU agencies. Wood (2018) maps the variation in the extent to which EU agencies are proactively engaging with societal stakeholders in their environment through various communicative, collaborative and evaluative practices. Moreover, recently collected data indicates that two EU agencies voluntarily include non-state stakeholders in their respective management boards (Arras & Braun, 2018, p. 1266), five EU agencies have initiated public consultation procedures beyond legal requirements (Arras & Braun, 2018, p. 1266) and six EU agencies have voluntarily established stakeholder forums (Busuioc & Jevnaker, 2022). In addition, Busuioc (2013) and Piquet (2021) have documented that some EU agencies have sought to strengthen their accountability to principals, for instance by requesting hearings before the EP. While these studies map the existence of, and the variation in, voluntary accountability practices among EU agencies and explore possible explanations, they do not deductively test the drivers of such accountability-seeking behaviour.

Based on a reputation-informed perspective, this study aims to explain the observed variation in voluntary accountability among EU agencies using a quantitative research design that combines survey data and unobtrusive data. Survey data was collected from EU agencies' senior managers and directors in order to systematically measure organisational accountability-seeking behaviour vis-à-vis six different audiences. Addressing the question what explains EU agencies' accountability-seeking behaviour is relevant in various ways. First, it has long been debated how to legitimize governance through EU agencies – and by extension the EU regulatory state more

generally – given the weak democratic basis of EU agencies due to their formal independence from democratic institutions (Follesdal & Hix, 2006; Majone, 1999; Moravcsik, 2002; Vos, 2005). Accountability is typically considered one of the primary mechanisms for reconciling formal independence with democracy (Busuioc, 2009). Studies have hitherto predominantly focused on mandatory accountability mechanisms in this regard, although it is increasingly recognized that EU agencies themselves can play a key role in overcoming their own democratic deficits (Busuioc & Rimkutė, 2020b; Schmidt, 2019). By drawing attention to, and uncovering the drivers of, the unregulated and informal ways in which EU agencies render account to a variety of audiences, this study helps us to better understand to what extent, and why, EU agencies contribute to the legitimization of the EU regulatory state.

Second, this chapter contributes to scholarship on reputation in the EU. It has been argued that bureaucratic reputation theory provides a compelling account of why agencies engage in voluntary accountability (Busuioc & Lodge, 2016, 2017), whereas alternative theories that have dominated the debate about EU agencies' accountability for a long time (e.g., principal-agent theory; Kassim & Menon, 2003) fall short in this regard (Karsten, 2015; Schillemans & Busuioc, 2015). Moreover, it has been argued that bureaucratic reputation theory provides a promising lens for studying the EU regulatory state (Busuioc & Rimkutė, 2020b) and various empirical studies provide support for this (Busuioc, 2016; Busuioc & Rimkutė, 2020a; Fink & Ruffing, 2020; Piquet, 2021; Rimkutė, 2018, 2020b; Tidå, 2022). Despite the burgeoning literature on EU agencies and their reputation, the oft-made assertion that EU agencies' accountability-seeking behaviour is motivated by reputational considerations has remained largely untested. By deductively testing theoretical expectations derived from reputational scholarship in relation to accountability-seeking behaviour, this study helps to make further progress in understanding how reputational dynamics affect EU agencies' behaviour.

4.2 A REPUTATIONAL PERSPECTIVE ON VOLUNTARY ACCOUNTABILITY

The accountability of EU agencies has been studied predominantly through the lens of principal-agent theory. When effective accountability mechanisms are *not* in place, principal-agent theory expects public agencies ("agents" in principal-agent terminology) to seize opportunities to pursue their own goals, rather than to act in the interest of their political masters ("principals" in principal-agent terminology). As such, the standard assumption in this theory is that agencies will try to 'defy, duck or game accountability obligations' (Schillemans & Busuioc, 2015, p. 203). However, contrary to this assumption, EU agencies have been found to *voluntarily* engage in a variety of practices that increase their accountability, such as extensive public communication and social media presence, non-mandated consultations with stakeholders and requests for parliamentary hearings (Arras & Braun, 2018; Busuioc, 2013; Busuioc & Jevnaker, 2022; Wood, 2018). The image arising from this literature is that many EU agencies are in important ways *accountability-seeking* rather than *accountability-avoidant*.

Recently, Busuioc and Lodge (2016, 2017) have proposed bureaucratic reputation theory as a promising lens for answering why agencies seek accountability. The bureaucratic reputation literature is concerned with how public sector organisations, or more specifically regulators, attempt to cultivate their reputation among audiences that matter – that is, audiences whose beliefs and support are crucial to the organisation. A good reputation is an indispensable and valued organisational asset, which may, for instance, facilitate efforts to build public support, bolster one’s autonomy from political principals, and help to shield the organisation against external attacks and criticism (Carpenter, 2010b). A reputational perspective on accountability suggests that accountability practices are not mainly about controlling agencies to prevent them from “drifting” away from principal interests. Instead, accountability practices are considered to be events in which reputations (of both account-holders and account-givers) are shaped. Accountability practices can either improve or damage the reputation of agencies depending on the actual outcomes of accountability. In accountability proceedings, agencies will thus seek to present themselves in reputationally beneficial ways (Busuioc & Lodge, 2016).

Voluntary accountability allows an agency to demonstrate that it is capable of discharging the tasks assigned to it in a correct, just, competent and effective way. What is particularly important in this regard is that voluntary accountability, in contrast to mandatory accountability, tends to occur largely on the agency’s own terms. When account-giving is voluntary, an agency can thus stay in control of its own accountability regime and thereby ‘reap the reputational benefits of accountability while lowering the associated potential costs’ (Busuioc & Lodge, 2016, p. 254). Agencies may also render voluntary account in order to establish good relations with, and secure support from, specific audiences. As such, agencies can build so-called “coalitions of esteem” (Carpenter, 2000), which serve as informal sources of authority that can empower and protect them against threats from their principals (Bertelli & Busuioc, 2021). Political principals may refrain from taking corrective actions (e.g., reversal of a decision, dismissal of agency head) against highly appreciated and well-networked agencies because they expect high reputational losses from such actions (Carpenter & Krause, 2015).

4.3 REPUTATION-INFORMED EXPLANATIONS OF VOLUNTARY ACCOUNTABILITY: FORMAL INDEPENDENCE, MEDIA SALIENCE AND EP INTEREST

The EU has gone through “waves of agencification” (Busuioc, 2013; Curtin, 2005; Dehousse, 2008; Kelemen & Tarrant, 2011). There are many different kinds of EU agencies, diverging on several dimensions, including their formal independence (Wonka & Rittberger, 2010). But while different agencies have different degrees of formal independence, they are generally structurally disaggregated from their political principals, operating at an arm’s length. In the EU, the formal independence of agencies has been promoted as one of their main virtues, as their insulation from unpredictable political pressures supposedly allows agencies to base (regulatory) decisions and actions on technical expertise rather than political and/or industry interests, thereby increasing their efficiency and credibility (Majone, 2001).

However, this “rise of the unelected” (Vibert, 2007) does not come without complications, as the independence of EU agencies has caused concerns about possible accountability deficits (Curtin, 2007; Fisher, 2004). Paired with agencies’ non-majoritarian nature, questions have been raised about EU agencies’ ‘lack of a democratic mandate to take potentially far-reaching decisions’ (Busuioc & Lodge, 2016, p. 253). As such, while the independence of EU agencies’ has been the main “selling point” of the agency model”, it has also ‘created corresponding compensatory pressures for the introduction of mechanisms for enhanced legitimation’ (Busuioc & Jevnaker, 2022, p. 158). Going above and beyond accountability obligations and adopting voluntary accountability practices can thus be a strategy to manage reputational risk stemming from their non-majoritarian nature, allowing agencies to signal that they do take their accountability seriously (Busuioc & Lodge, 2016). For this reason, voluntary account-giving can serve to enhance the legitimacy of EU agencies. As independence is the main cause of democratic deficits, more independent EU agencies have a greater need to compensate for their lack of democratic legitimacy. Accordingly, our first hypothesis is formulated:

H1: More independent EU agencies will render more voluntary accounts.

Accountability also provides agencies with opportunities to showcase good performance and successes towards their principals. An essential prerequisite for this function of accountability is that principals invest in holding agencies accountable by processing and assessing the information provided by the account-giver. However, empirical studies have shown that while particular agencies are scrutinized intensively (e.g., Rimkutė, 2020b), many agencies ‘languish in obscurity’ (Pollitt, 2006, p. 29), have ‘minimal direct contact’ with key political account-holders such as parliaments (Hogwood et al., 2000, p. 222) and ‘operate at the periphery of political attention’ (Schillemans, 2011, p. 10). As such, agencies may run the risk of disappearing altogether from the radar of important ‘decisional powers-that-be’ (Schillemans & Busuioc, 2015, p. 210). This could have damaging consequences for agencies when political principals decide on the allocation of budgets, non-pecuniary resources and tasks. In order to avoid running the risk that essential resources are allocated to agencies that are deemed to deal with more politically pressing issues, agencies that receive little attention from their political principals may need to engage in voluntary accountability to proactively demonstrate their value through self-initiated accountability procedures. Vice versa, those agencies that are already on top of political principals’ mind may not engage much in voluntary accountability because they already have plenty of encounters with their principals in which they can establish and maintain their reputation.

While this theoretical mechanism could in principle be invoked by a lack of attention from any EU principal, we presume that it is most prominent in the case of the EP. First, the EP has been found to be especially volatile in its attention and interest (Font & Pérez-Durán, 2016), paying much attention to certain EU agencies while neglecting many others. Second, the EP is being uniquely situated to provide democratic legitimacy to EU agencies as the only directly elected principal in the EU and engagement from the EP with the agency’s work is therefore considered by EU agency leaders as an important source of democratic legitimacy (Leidorf-Tidå & de Boer, 2022). Third,

the EP plays a prominent role in a variety of accountability procedures (e.g., agency mandate, the discharge procedure, appointment procedures) and the decisions made by the EP in these procedures have important consequences for EU agencies. Being on the radar of the EP is therefore crucial for EU agencies (Busuioc, 2013). Hence, our second hypothesis is formulated as follows:

H2: More interest from the EP is associated with lower levels of voluntary accountability.

Due to a negativity bias in the media – i.e., the media’s inclination to view negative developments as more “newsworthy” than positive ones (Boon, Salomonsen, Verhoest, et al., 2019) – attracting much attention from the media is inherently risky for agencies. Moreover, high salience often indicates that an agency is controversial, meaning that its audiences have strongly opposing expectations about the agency. Consequently, media salience is often regarded as one of the main sources of reputational threats (Gilad, 2015; Rimkutė, 2020b). Under such conditions, agencies may aim to shield themselves against possible critique and attacks by building a good reputation with specific audiences. Such efforts help agencies to build so-called “coalitions of esteem” (Carpenter, 2000), whose support constitute an informal source of authority. This has been termed “reputation-sourced authority” (Bertelli & Busuioc, 2021). Challenging and criticizing agencies with much reputation-sourced authority is believed to be risky for audiences, as allegations against highly appreciated and well-networked agencies could backfire and cause high reputational losses for the accuser (Carpenter & Krause, 2015). Agencies subject to higher media salience therefore have stronger incentives to use voluntary account-giving to create a reputational buffer that protects them against criticism and allegations. Our third hypothesis is formulated accordingly:

H3: Higher levels of media salience are associated with more voluntary accountability.

As will be explained more elaborately below, this study focusses on voluntary accountability towards six audiences. Nevertheless, the hypotheses do not differentiate between audiences as we believe there to be insufficient theoretical understanding of which audiences matter under which conditions to meaningfully theorize this aspect (cf. Boon et al., 2020). We therefore treat the question about the direction of voluntary account-giving as an open empirical question that will be answered retrospectively in the discussion section of this chapter.

4.4 DATA AND METHODS

The hypotheses are tested using a quantitative research design, relying on a combination of original survey data and unobtrusive data. For the measurement of voluntary accountability, an online survey was disseminated to senior managers and directors from the 45 EU agencies that were a member of the EU Agency Network² at the time that the survey was administered, tapping into the unique experiences and insights that are held by these top-level EU executives. The survey

² <https://euagencies.eu/>

was sent to all senior managers from each EU agency in one of the following positions: executive director, deputy director, administrative director and head of operations. As organisational structures vary across EU agencies, organigrams were consulted to find the relevant positions within each EU agency. The official EU Who's Who³ was consulted if no organigram was available or if the organigram did not provide enough information to identify the individuals occupying the relevant positions. A general rule for inclusion in the sample was that public officials are only included when they work under the direct supervision of the executive director. An invitation email with a link to the survey was sent to all managers in the sample of which email addresses were available and several reminders were sent subsequently to boost the response rate. The survey was disseminated to 220 senior managers and completed by 75 persons (34% response rate) from 39 different EU agencies.⁴ For this study, data from the 30 decentralized EU agencies (based on individual 55 responses) in the dataset is used.⁵

4.4.1 MEASUREMENT

The dependent variable – *voluntary accountability* – is measured with the following survey question: ‘To what extent does your agency take initiative to explain and justify its work beyond legal requirements to representatives of the following actors?’ The answers could vary from “Not at all” (1) to “A great deal” (5). We asked this question with regards to the following actors: “European Parliament”; “Council of the EU”; “interest groups”; “major corporations”; “the media”; and “the general public”.⁶ This selection includes all types of audiences that have been identified as relevant targets of voluntary accountability as well as reputation management (Boon et al., 2020; de Boer, 2021). It includes *principals* (the EP and the Council of the EU), *societal stakeholders* (interest groups and major corporations) and *general audiences* (the media and the general public).

3 <https://op.europa.eu/s/wwnp>

4 One respondent with straight-lined answers, who answered “Not at all” (1) on all questions relating to voluntary accountability, was removed from the dataset. Of the 75 respondents that completed the survey, two respondents did not answer any of the questions about voluntary accountability.

5 While the reason for including non-decentralized EU agencies was to raise the sample size and relatedly increase the probability of finding statistically significant relationships, it was found upon analysis that the inclusion of non-decentralized EU agencies has largely determinantal effects. For example, model fit is substantively worse when non-decentralized EU agencies are included compared to when they are excluded. We presume that one important reason for this is that we lack sufficient data to measure *EP interest* accurately for non-decentralized EU agencies. Looking at the full population of EU agencies (i.e., the 45 EU agencies that were a member of the EU Agency Network at the time that the survey was administered), we see that non-decentralized EU agencies ($M = 5.17$, $SD = 7.18$) were mentioned on average in far less agenda items during the eighth parliamentary term than decentralized EU agencies ($M = 20.33$, $SD = 12.13$). Two non-decentralized EU agencies that filled in the survey were not even part of any agenda item. This means that the measure of *EP interest* relies only on a handful agenda items for most non-decentralized EU agencies in the sample. This measure is therefore likely to be unreliable for this subset of EU agencies, which would lead to a reduction of power and, even worse, a possible bias in the estimates. Furthermore, while non-decentralized EU agencies are structurally detached from the EC and other EU institutions in the same way as decentralized EU agencies, they may simply be too different in terms of their incentives to engage in voluntary account-giving and therefore not comparable in this respect. We believe that the most appropriate solution is to not include non-decentralized EU agencies in the analysis. For comparison, the results of the analysis of the full sample (i.e., including non-decentralized EU agencies) can be found in appendix 4.E.

6 We also asked about voluntary accountability towards the EC and the Management Board. However, these items are not used in this study.

All measures of the independent variables are from different sources to prevent common source bias (Favero & Bullock, 2015) and operationalized as follows. *Formal independence* was operationalized with an index consisting of fourteen items. Data was collected by manually coding EU agencies' founding regulation. Our formal independence index takes its starting point in the independence index developed by Wonka and Rittberger (2010). This index was revised and improved methodologically following the recommendations and guidelines provided by Hanretty and Koop (2012). After data collection, we conducted a Bayesian factor analysis using the MCMCpack package (Martin et al., 2011) in R to derive the final independence scores. This procedure has been described by Hanretty and Koop (2012, p. 213) as the 'first-best solution' for estimating formal independence scores. Multiple diagnostic statistics were consulted to assess the validity of the results. The independence scores of the individual EU agencies, the coding scheme and further details can be found in appendix 4.A. Given that formal independence is the *raison d'être* of non-majoritarian institutions and therefore at the heart of debates about regulatory governance in the EU (Majone, 1997; Wonka & Rittberger, 2010), the availability of an updated and enhanced formal independence index is relevant beyond this study. It opens up new avenues for studying more precisely the foundations behind the institutional design of EU agencies, as well as how formal independence affects EU agencies' organisational behaviour and other relevant outcomes (e.g., expertise, credibility).

EP interest was operationalized as the average number of MEPs that take the floor during agenda items pertaining to an EU agency. This operationalization is consistent with insights from the political science literature that indicate 'that congressional hearings are the best measure of congressional attention' (Walgrave et al., 2017, p. 555). We decided to operationalize this variable by focussing on MEPs' *participation* during relevant agenda items, as opposed to simply looking at the conducted number of hearings. The reason for this is that oversight activities, such as parliamentary hearings or appointment procedures, are in part routine and stipulated explicitly by legal documents such as founding regulations. Hence, the number of parliamentary oversight activities (partially) reflects the institutional design of an EU agency. It is therefore an imperfect measure of MEPs' actual interest in an EU agency. By contrast, the degree of participation during relevant agenda items reflects more accurately MEPs' willingness to engage with the work of an EU agency, and it has the benefit of helping us to distinguish more clearly between EP interest and EU agencies' formal design. This latter aspect is particularly important for our study as EU agencies' formal design is part of our measure of formal independence. Data on EP interest was collected from meetings taking place in the twelve parliamentary standing committees with oversight responsibilities for at least one EU agency during the eighth parliamentary term (2014-2019). Some agenda items involved voting. These agenda items were excluded from the analysis as MEPs then usually only cast their vote and do not take the floor at that moment. After removing the agenda items in which votes were cast, the dataset with the full population (i.e., all 45 EU agencies) contained 733 agenda items, of which 551 agenda items pertain to the 30 decentralised agencies that are analysed in this chapter. The measure of EP interest was created on the basis of this data.

Media salience was measured by counting the number of references to an agency in 27 European newspapers. The selection includes newspapers in five different languages (English, French, Spanish, German and Italian) from seven (former) Member States (UK, Ireland, France, Spain, Germany, Italy and Austria). Data was collected through the Factiva database and spans the five-year period immediately before collection of the survey data (October 2014 - October 2019). We deliberately chose a long time period, because this ensures that the measure reflects an agency's *overall* media salience since the effects of external events that may have led to an unusual high level of media attention for an agency at a particular moment are smoothed out. The selection of newspapers builds on Reh et al. (2011) and Font and Pérez-Durán (2016).⁷ The distribution of this variable was found to be positively skewed and nonlinearly related to the outcome variables. This variable was therefore log-transformed.

Two control variables are included. We control for whether an agency has a *regulatory* (i.e., decision-making) task, an *informational* task or *another* type of task (Busuioc & Jevnaker, 2022; Rimkutė, 2020a), as task environment has been found to be an important predictor of the perceived relevance of different types of audiences (Boon et al., 2020). We also control for *organisational size* to account for the human resources available at an agency to invest in voluntary accountability. This variable was operationalized as the number of permanent staff in 2019, in FTE, working at an agency. This data was collected from the European Court of Auditors' report and EU agencies' annual reports. This variable was log-transformed.

4.4.2 ANALYSIS

The survey was disseminated to multiple senior managers and directors from the same EU agencies, which resulted in multiple observations per EU agency. As we aim to explain *organisational* behaviour, we decided to aggregate individual responses into organisational scores. This was done by taking the average across all answers from respondents belonging to the same EU agency. For example, if one respondent would answer "Somewhat" (3) on the question about voluntary accountability towards the media and if another respondent working at the same EU agency would answer the same question with "Much" (4), the final score for that organisation would be 3.5. Because of this aggregation, the measurement level of the outcome variables is not truly ordinal, but instead more or less continuous. We therefore chose to run ordinary least square (OLS) regression.

⁷ The following newspapers were included: Der Standard (Austria); Die Press (Austria); L'Express (France); Le Figaro (France); Le Monde (France); Le Monde.fr (France); L'Indépendant (France); Frankfurter Rundschau (Germany); taz - die tageszeitung (Germany); Die Welt (Germany); Der Tagesspiegel (Germany); La Stampa (Italy); La Nazione (Italy); Il Resto del Carlino (Italy); Il Giorno (Italy); Corriere della Sera (Italy); El País - Nacional (Spain); El Mundo (Spain); ABC (Spain); Daily Mail (UK); The Observer (UK); The Sun (UK); The Guardian (UK); The Independent (UK); The Times (UK); The Irish Times (Ireland).

4.5 RESULTS

Summary statistics and correlations for all variables included in the analysis after transformation are presented in Table 4.1. The descriptive statistics show that self-reported voluntary accountability is generally high. On a scale from 1 to 5, it ranges between 2.5 (Audience 6: Major corporations) and 4.08 (Audience 1: European Parliament). Furthermore, the level of variation in the six indicators for voluntary accountability differs remarkably, with voluntary accountability toward the EP having the least variation ($SD = 0.58$) and voluntary accountability towards the Council of the EU having the most variation ($SD = 1.2$). It is also noteworthy that logged *media salience* and *EP interest* correlate with each other substantially ($r = 0.46$), which is to be expected and can be seen as a sign of external validity for our novel measure of *EP interest*. Note that an assessment of the values of the variance inflation factor (VIF) indicated that multicollinearity is not a concern. All values are well below the conservative threshold of 5.

Table 4.2 presents the results of the regression analysis. Stepwise regression models are available in appendix 4.C. All models report traditional standard errors, as heteroskedasticity is not statistically confirmed in these models. Nevertheless, the results are slightly different depending on whether classical standard errors or robust standard errors are used. As recommended by King and Roberts (2015), we are treating the size of the discrepancy between the two types of standard errors as a diagnostic – an indication of a problem in the model that should make us more cautious/conservative in interpreting the results. Models with robust standard errors are reported in appendix 4.B. The most important discrepancies will be mentioned below.

We see that our first hypothesis, which stipulated that formal independence affects voluntary accountability, is not supported. Although the coefficient for this predictor is in the expected, positive direction in all but one model (the exception is “Audience 6: Major corporations”, with a coefficient of -0.01), it’s only significant at the 0.1 level in the model explaining voluntary accountability towards the EP.

Our second hypothesis formulated our expectation that the level of EP interest would have a *negative* effect on voluntary accountability. The expected negative relationship is statistically confirmed in the case of voluntary accountability towards the EP ($p = 0.002$). Moreover, the models show that there are marginally significant negative relationships between EP interest and voluntary accountability towards the Council of the EU ($p = 0.06$) and the media ($p = 0.08$).

Our third hypothesis stated that media salience has a positive effect on voluntary account-giving. The results show this variable is significant at the 0.05 level in four models and the coefficients in these four models are in the expected direction. Specifically, we find that media salience is positively related to voluntary accountability towards the EP ($p = 0.02$), the Council of the EU ($p = 0.03$), the media ($p = 0.03$) and the general public ($p = 0.05$).

Concerning the control variables, the results show that regulatory EU agencies render significantly more voluntary accounts to interest groups ($p < 0.001$) and major corporations ($p < 0.001$) than EU

agencies that neither have a regulatory task nor an informational task. We furthermore find that EU agencies with an informational task engage significantly more in voluntary accountability towards the media ($p = 0.01$) and interest groups ($p = 0.001$) compared to EU agencies that neither have a regulatory task nor an informational task. We do not find a statistically significant relationship between staff size and voluntary accountability, but it is noteworthy that the coefficient for this predictor is negative in all six models.

As mentioned above, we checked whether robust standard errors deviate substantially from classical standard errors. This robustness check revealed three discrepancies that are worth mentioning. The positive relationship between formal independence and voluntary accountability towards the EP is no longer statistically significant at the 0.1 level when using robust standard errors ($p = 0.14$). Moreover, the positive relationships identified between media salience on the one hand and voluntary accountability towards the EP and the general public on the other hand should be interpreted cautiously as they are no longer statistically significant when robust standard errors are used (in both cases, $p > 0.1$ when robust standards errors are used).

■ Table 4.1: Descriptive statistics (N = 30)

Audience 1: European Parliament	4.08	0.58	(1)	1	.	.	.	.	.	.	.	.	.	.	.	.
Audience 2: Council of the EU	3.27	1.20	(2)	.68	1	.	.	.	.	.	.	.	.	.	.	.
Audience 3: Media	3.54	0.73	(3)	.33	.37	1	.	.	.	.	.	.	.	.	.	.
Audience 4: General public	3.24	0.70	(4)	.31	.30	.31	1	.	.	.	.	.	.	.	.	.
Audience 5: Interest groups	3.28	1.03	(5)	.00	-.16	.17	.16	1	.	.	.	.	.	.	.	.
Audience 6: Major corporations	2.50	1.14	(6)	-.07	-.24	.03	.22	.62	1	.	.	.	.	.	.	.
Media salience (log)	3.44	2.25	(7)	.29	.19	.39	.29	-.03	-.04	1	.	.	.	.	.	.
EP interest	5.63	2.01	(8)	-.29	-.18	.02	-.06	.13	.10	.46	1	.	.	.	.	.
Formal independence	0.40	0.64	(9)	.20	.13	.00	.09	.26	.26	.18	.27	1	.	.	.	.
Number of staff (log)	5.23	0.90	(10)	.12	-.09	.04	-.04	-.17	.06	.63	.25	.12	1	.	.	.
Regulatory agency	0.33	0.48	(11)	-.08	-.20	-.11	.05	.45	.71	.26	.16	.37	.35	1	.	.
Informational agency	0.43	0.50	(12)	.12	.20	.47	.17	.14	-.34	.06	.16	-.14	-.28	-.62	1	.
Other type	0.23	0.43	(13)	-.05	.00	-.43	-.25	-.67	-.39	-.36	-.38	-.24	-.06	-.39	-.48	1

■ Table 4.2: Regression models

Audience 1: European Parliament		Audience 2: Council of the EU		Audience 3: Media		Audience 4: General public		Audience 5: Interest groups		Audience 6: Major corporations		
Predictors	Estimates	p	Estimates	p	Estimates	p	Estimates	p	Estimates	p	Estimates	p
Intercept	4.60 (0.69)	<0.001	5.59 (1.64)	0.002	3.67 (0.89)	<0.001	4.35 (1.00)	<0.001	3.33 (1.05)	0.004	1.99 (1.19)	0.106
Media salience (log)	0.15 (0.06)	0.017	0.31 (0.14)	0.034	0.17 (0.07)	0.031	0.18 (0.08)	0.046	-0.11 (0.09)	0.245	-0.16 (0.10)	0.124
EP interest	-0.19 (0.05)	0.002	-0.25 (0.12)	0.059	-0.12 (0.07)	0.083	-0.11 (0.07)	0.150	-0.01 (0.08)	0.891	0.04 (0.09)	0.685
Formal independence	0.32 (0.15)	0.052	0.52 (0.36)	0.166	0.02 (0.20)	0.924	0.08 (0.22)	0.705	0.10 (0.23)	0.656	-0.01 (0.26)	0.974
Number of staff (log)	-0.02 (0.14)	0.863	-0.38 (0.33)	0.256	-0.10 (0.18)	0.572	-0.25 (0.20)	0.216	-0.20 (0.21)	0.345	-0.02 (0.24)	0.926
Reference: Other type of agency												
Regulatory agency	-0.19 (0.27)	0.487	-0.70 (0.64)	0.283	0.33 (0.34)	0.351	0.25 (0.39)	0.528	2.18 (0.41)	<0.001	2.22 (0.46)	<0.001
Informational agency	0.15 (0.26)	0.561	0.04 (0.60)	0.943	0.87 (0.33)	0.013	0.29 (0.37)	0.432	1.52 (0.38)	0.001	0.54 (0.44)	0.228
Observations	30		30	30	30	30	30	30	30	30	30	
R ² / R ² adjusted	0.457 / 0.315		0.307 / 0.127		0.456 / 0.314		0.244 / 0.047		0.615 / 0.515		0.595 / 0.490	

Note: Table entries are unstandardized OLS regression coefficients.

4.6 DISCUSSION

The results from the analysis above indicate that hypothesis 1 is not supported. We find no robust relationship between formal independence and the outcome variables. One possible explanation for this finding is that the analysis lacks enough statistical power to demonstrate this relationship. In all models – with the exception of model “Audience 6: Major corporations” – the coefficient for formal independence is in the expected, positive direction. It is furthermore noteworthy that the coefficients for formal independence in the models explaining voluntary accountability towards *principals* (“Audience 1: European Parliament” & “Audience 2: Council of the EU”) are much larger than the coefficients for formal independence in the other models and closest to traditional levels of significance. This pattern is consistent with findings from Apaydin and Jordana (2021), who demonstrated in a comparative case study that highly independent agencies will direct voluntary account-giving towards a smaller group of political principals – rather than the wider community of societal stakeholders – in order to “re-connect” with their principals and ensure that enough resources are secured to competently execute the tasks that have been delegated to them. Hence, if one were to design a study with more statistical power in order to demonstrate statistically that formal independence affects voluntary accountability, we suggest focusing on voluntary accountability towards principals.

In support of hypothesis 2, we observe that EP interest is negatively related to voluntary accountability towards the EP, the Council of the EU and the media, although the relationship is only marginally significant in the case of the Council of the EU and the media. Yet, this finding can be interpreted as an indication that a lack of interest from principals in formalized oversight activities incentives EU agencies to *proactively* demonstrate their value, either by directly seeking to give account to principals or by voluntarily giving account to the media. Thus, agencies are not (only) concerned about being scrutinized too much – which would lead them to lose their information advantage over their political masters as would be the classical assumption in principal-agent theory – but they (also) fear too little scrutiny. While principal-agent theory is almost exclusively concerned with rent-seeking behaviour when agencies are not sufficiently accountable, bureaucratic reputation theory provides a nuanced picture of the ways in which agencies can both benefit and suffer from accountability processes. Rather than assuming that agencies ultimately want to escape accountability as much as possible, it stresses that, while escaping accountability has certain benefits, agencies want to avoid becoming completely “out of sight” and therefore “out of mind”, as this could have detrimental consequences in terms of reputation, resources, relations and salience. It can be in agencies’ interest to be in principals’ “sight” in order to ensure that they are on principals’ “mind”.

We furthermore find that that media salience has a robust *positive* relationship with voluntary accountability towards both the Council of the EU and the media, lending support to hypothesis 3. This further corroborates the importance of media salience as a driver of voluntary accountability (Koop, 2014). Interestingly, almost all relationships between media salience and EP interest on the one hand and voluntary accountability on the other hand are *insignificant* when *not* controlling for any other variables. In the bivariate regression models (see appendix 4.C), the only significant

effect of either media salience or EP interest concerns the effect of media salience on voluntary accountability towards the media. This suggests that including both media salience and EP interest in the model removes some of the error associated with omitting these variables, leading to an increase in the amount of variance that can be attributed to the other variable, in turn allowing us to identify these variables as significant predictors of voluntary accountability. This is an interesting finding as media salience and parliamentary attention have previously been treated as indicators of the larger construct of salience (Koop, 2014). Possibly, media salience and parliamentary interest may be less closely aligned in the context of the EU than at the national level, but it could also be that our novel measure of *EP interest* better captures variation in MEPs' attention for reasons other than pure salience considerations. This finding is also relevant for the reputational literature, which has so far almost exclusively focused on media salience (e.g., as an indicator of reputational threats). Our results suggest that measures of attention from other audiences should be incorporated in quantitative studies on the effects of reputation on organisational behaviour and rhetoric. In other words, audience multiplicity should also be taken seriously in the measurement of reputational variables.

The empirical support for H2 and H3 refines the expectation formulated by Busuioc and Lodge (2017), who wrote that 'political interest in agency performance is found to be related to salience considerations; organizational bodies at the low end of the salience spectrum will have to seek approval and support elsewhere.' We find that EU agencies facing principal neglect tackle the problem *head-on* by rendering account to the principals that neglect them and seeking to increase their salience by rendering account to the media. Voluntary accountability towards interest groups and major corporations appears on the other hand, to depend heavily on organisational task. So, rather than (only) rendering voluntary accounts towards societal stakeholders to compensate for neglect by principals, this points to the function of voluntary accountability as an opportunity for agencies with regulatory/informational tasks to acquire information, expertise and knowledge from stakeholders in their environment. Agencies with regulatory/informational tasks tend to depend more heavily on (expert) information from stakeholders in their field (Arras & Braun, 2018) and therefore have greater needs to establish accountability processes through which their informational needs can be satisfied.

4.7 CONCLUSION

To conclude, this study has sought to test whether reputation-informed explanations can help us understand why and to whom EU agencies seek accountability. Hypotheses were tested using a dataset combining original survey data collected from members of EU agencies' top management and unobtrusive data. The analysis shows that reputational rationales appear to be important drivers of accountability-seeking behaviour, as both media salience and EP interest were found to be significantly related to voluntary accountability vis-à-vis multiple audiences. The data underlying the analysis has some shortcomings that warrant caution. Notably, the low number of observations does not allow us to reach definitive conclusions about the patterns found. A power analysis of the sensitivity revealed that the models presented above could only be relied upon for

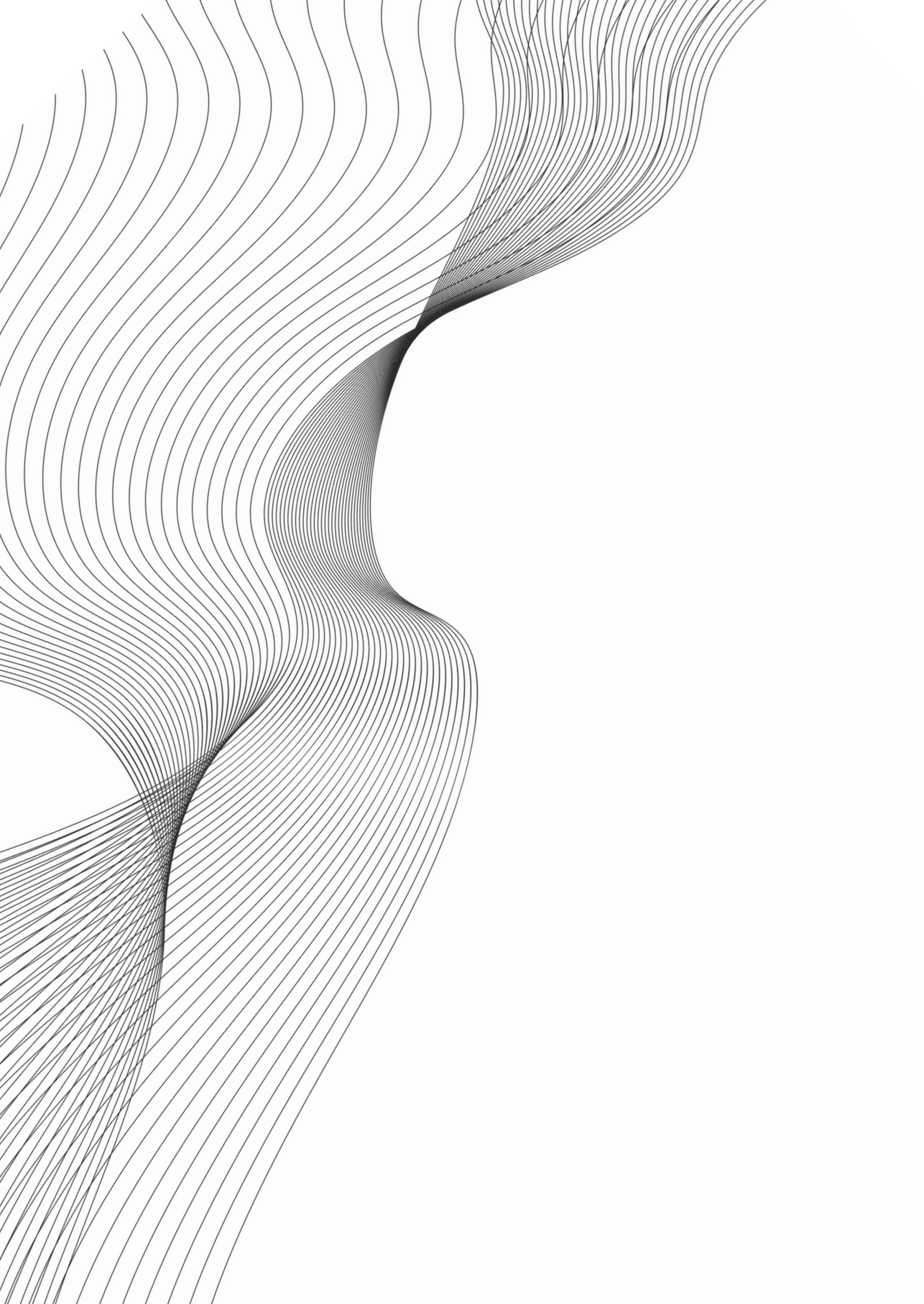
detecting effects of Cohen's $F^2 > 0.59$, which is considered a very large effect size (see appendix 4.D for more information). Furthermore, endogeneity cannot be fully ruled out as account-giving may to some extent be a predictor of some of the explanatory variables included in the analysis and not simply a response to them (e.g., media salience may be higher for EU agencies that are more actively seeking accountability to the media). Nonetheless, as a plausibility probe of a possible mechanism behind voluntary accountability, this study gives insightful directions for future research. At a minimum, the empirical evidence from this study suggests that reputational mechanisms need to be seriously considered as a factor driving voluntary accountability. Further research – using richer datasets and/or methods better able to deal with possible problems of endogeneity – is needed to determine more precisely the strength of the patterns found and to unravel the web of causality. Furthermore, our study has focused predominantly on explaining the intensity and direction of voluntary accounts. Notwithstanding the importance of these aspects, future studies could zoom in on other aspects, such as *how*, *for what* or *when* voluntary accounts are rendered.

Despite these limitations, our study sheds light on the proactive role of EU agencies in managing and shaping their own accountability landscape and the mechanisms driving this organisational behaviour. Although not all EU agencies are equally likely to become “accountability entrepreneurs”, a one-sided focus on formal accountability arrangements will lead us to miss important practices of actual account-giving and account-holding. Furthermore, the findings highlight, once more (Karsten, 2015; Maggetti & Papadopoulos, 2018; Olsen, 2013; Philp, 2009; Schillemans & Busuioc, 2015), that principal-agent theory has serious shortcomings as a framework for understanding *actual* accountability behaviour in the public sector. The reputational perspective provides a promising alternative in this regard.

Finally, this study serves as a reminder that audiences do matter and that understanding voluntary accountability requires a multi-audience perspective (de Boer, 2021). While audience multiplicity is certainly not a new concept (Carpenter, 2001, 2010b), it seems that scholarly interest in audience multiplicity has recently renewed and spread more broadly as various recent studies have (re-) emphasized the importance of this concept for reputation (Boon et al., 2020), accountability (Aleksovska et al., 2022; van de Sande et al., 2021) and other democratic qualities (Maman, 2022). Complementary to these studies, this study provides more specific insights into audience multiplicity within the context of voluntary accountability.

On a more general note, this study fits with a stream of recent studies that call for a recalibration of the dominant view of EU agencies as largely passive actors (Arras & Braun, 2018; Busuioc & Jevnaker, 2022; Wood, 2018). Such studies concur with insights from research on, among others, regulation, accountability and reputation. For instance, Black (2010, p. 337) writes: ‘The assumption is frequently that regulators are there as passive objects to be ‘rated’ on some form of legitimacy scorecard. However, again, regulators are not passive in their relationship with their evaluators.’ In the same way as their counterparts in the Member States (e.g., Koop, 2014), EU agencies are no longer – or perhaps never have been – the victim of accountability pressures. Instead, they should be seen as entrepreneurs who proactively manage their own accountability and attempt

to build their own legitimacy. Importantly, it is largely unclear at this point what the (normative) implications of such entrepreneurial behaviour are. EU agencies' accountability initiatives could stand to make European governance more legitimate, but at the same time voluntary accountability, especially when geared towards societal stakeholders, could induce bias in EU agencies' decision-making processes (Busuioc & Jevnaker, 2022) or de-legitimize ex-post oversight by principals (Bertelli & Busuioc, 2021). Finding out whether EU agencies' entrepreneurial stance should be celebrated or viewed cautiously is therefore an important challenge that lies ahead.





CHAPTER 5

The Use of Social Media as an Accountability Instrument: A Promise Fulfilled?

This chapter is currently under review with an international, peer-reviewed journal (revise & resubmit).

This chapter is co-authored with Madalina Busuioc and Aaron Swaving.

The author statement can be found in appendix 1.A.



5.1 INTRODUCTION

Public accountability is being transformed in the information age. Public organisations across the world have adopted social media as an instrument for public communication (Feeney & Porumbescu, 2020; Mergel, 2017). Social media platforms such as Twitter potentially stand to become ever more important “battlegrounds” where the accountability of public organisations plays out in real-time in modern governance. Public organisations – be they public agencies (Mergel, 2017), local government (Hand & Ching, 2014; Kagarise & Zavattaro, 2017) or street-level bureaucracies (Campbell et al., 2014; de Graaf & Meijer, 2019) – are proving to be increasingly aware of the relevance of such platforms and invest considerably in their online communications from websites to social media presence. These organisational behaviours are said to be reflective of broader organisational concerns with cultivating a good organisational reputation, considerations that are understood to shape, among others, the accountability behaviour of public organisations in important ways (Busuioc & Lodge, 2016, 2017). Public organisations for instance, are found to increasingly engage in accountability-seeking behaviour – volunteering information and reaching out to outside audiences beyond formal mandated requirements – with the internet (Bovens, 2007, p. 457), including social media (Brummel, 2021; Ojala et al., 2019; Schillemans et al., 2013), emerging as an important outlet in this regard. The jury is still out however, on the accountability effects of these practices.

On the one hand, the use of social media in the public sector has been argued to potentially make public institutions more transparent and accountable (Bertot et al., 2012). Social media allows citizens to observe what their government is doing and, through this increased transparency, citizens can hold public institutions accountable. Social media, too, has the potential to strengthen the position of the general public as an accountability forum. It makes citizens less reliant on their representatives and/or on formal procedures for holding public institutions or officials accountable allowing citizens to directly engage with public officials in real time, voice their discontents and/or pass judgement on government performance. As noted by Bovens (2005, p. 200), rendering direct accounts to the public – as in the case of social media – ‘is horizontal accountability in the true sense, as the complete hierarchical chain, including Parliament, is surpassed and the agency, the minister, or the public manager is directly accountable to the citizenry.’ Horizontal accountability practices more broadly, are said to have the potential to make up for shortcomings of vertical, mandatory accountability arrangements (Schillemans, 2011), increasingly relevant given the diffuse character of modern governance (Michels & Meijer, 2008). As such, these practices could amount to positive (normative) developments from an accountability perspective, as “net contributors” to public accountability.

On the other hand, organisations’ up take of social media in the name of promoting accountability (and other uncontroversial public values) could simply be “ritualistic” or “symbolic” in nature. In other words, while social media provides an opportunity for organisations to strategically communicate with their audiences, ‘to showcase themselves in a positive light’ (Busuioc & Lodge, 2016, p. 254), this might not necessarily materialise into actual accountability. In addition to information provision (or transparency), meaningful accountability demands *engagement*

(an interaction between an actor and a forum) and the *possibility for consequences* (formal or informal such as reputational or other) when actor behaviour falls short of expectations (Bovens, 2007). In other words, '[p]urely informal or voluntary transparency does not amount to accountability' (Willems & Van Dooren, 2012, p. 1017). While social media provides an opportunity for organisations to communicate and inform about their performance to broader audiences, it is not clear to what extent actual engagement from audiences ensues or rather whether these practices amount to a 'monologue without engagement' (Bovens, 2007, p. 452). In fact, the relationship between transparency and accountability is not straightforward (Hood, 2010) and remains poorly understood today (Porumbescu et al., 2021).

A particular concern in the context of social media is that voluntary transparency – that is, transparency initiatives that are not formally regulated or mandated – can have little value for accountability (Meijer, 2014). We do not know, in other words, *to what extent* such developments amount to accountability or even serve to facilitate it. Put differently, while the relationship between social media and accountability is often assumed it is an open *empirical* question whether a practice can be regarded as accountability (Bovens, 2007). This is the puzzle we set out to investigate.

To that end, we develop an original measure of public accountability on Twitter and apply this to an important category of public bodies: EU agencies. The EU context provides a unique opportunity to study this because EU agencies are encouraged to use social media as a tool for boosting engagement with citizens (European Commission, 2013). As such, we have a medium-sized population of structurally similar public bodies that operate in a variety of policy areas, affording us an especially auspicious setting for comparative assessment. Our empirical analysis relies on an original dataset of Twitter data comprising two years (2018-2019) of tweets in English and amounting to 39,246 entries. This novel dataset is used to study EU agencies' presence on Twitter and their interactions with their audiences on this platform allowing us to ascertain to what extent these practices meet a "minimum accountability threshold" to qualify as accountability encounters. Finally, we also extricate key explanatory drivers that can help account for observed patterns.

The contribution of our study is three-fold: *First, methodologically* we develop a new measurement for public accountability on Twitter. Our study provides a set of indicators corresponding to prevailing frameworks that conceptualise accountability as a relational mechanism (Bovens, 2007). We develop indicators for each accountability phase using (i) frequency counts of agency tweets (*information phase*), (ii) frequency counts of user replies to agency tweets (*debate phase*) and (iii) the valence of user replies (*consequences phase*). Since both social media (Mergel, 2017) and accountability (Brandsma & Schillemans, 2013) have proven to be phenomena that are difficult to quantify, most empirical studies on the nexus between social media and accountability are qualitative in nature (e.g., Bertot et al., 2012; Karré & Vanhommerig, 2014; Ojala et al., 2019). Thus, our measure will allow scholars to concretely study and quantify a thus-far elusive phenomenon as well as to unpack and study its potential effects/implications for public accountability.

Second, our investigation speaks to an important *theoretical question* in the accountability literature: whether, and if so to what extent, such practices meet the accountability standard or are merely ritualistic, “window-dressing” practices in nature, of limited contribution to improving the state of public accountability in modern governance. Our measure allows us to speak to this question as it lays out a minimum threshold that needs to be met before we can speak of accountability on social media, allowing researchers to rule out practices that do not meet this threshold.

Thirdly, the article contributes to our understanding of strategic communications by EU agencies (Busuioc & Rimkutė, 2020a; Horsti, 2012) as well as to the literature on EU agency accountability (Busuioc, 2013). While public communication has been identified as an essential tool for reputation-building (Carpenter, 2010b; Maor, 2020), this literature has mostly looked at communication channels other than social media (e.g., press releases, websites, annual reports). Similarly, the literature on EU agency accountability has not specifically examined the impact of social media in this respect.

5.2 THEORETICAL FRAMEWORK

Public accountability is a core value in modern governance. Since the publication of Bovens’ seminal framework (2007), the majority of accountability studies conceive of accountability as a relational mechanism (Bovens et al., 2014). This notion of accountability refers to ‘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 as a mechanism entails three phases: ‘The process starts with the *information* phase, in which the actor provides an account of his conduct and behavior toward the accountability forum. (...) In the subsequent *discussion* phase, the forum assesses this account and may ask for additional information and pose follow-up questions. (...) In the end, the forum will pass judgment on the behavior of the actor in the *consequences* phase and will punish, correct or reward the actor when needed’ (Brandsma & Schillemans, 2013, p. 955, emphasis in original).

Crucial to this understanding is that accountability is a *social relation*. Being accountable requires that one takes actions to *explain and justify one’s* conduct to others. In the words of Black (2008, p. 150), ‘[t]o be accountable is to agree to subject oneself to relationships of external scrutiny which can have consequences.’ While there is a level of contestation or debate in the literature as to what extent *consequences* represent a constitutive element of accountability (Bovens, 2007, p. 451), there is literature agreement that information alone does not suffice and that, at a minimum, interaction with a specific forum is critical for a relationship to qualify as accountability (de Boer, 2021).

Social media is said to be of growing relevance for public accountability (Bertot et al., 2012; Brummel, 2021; Ojala et al., 2019; Schillemans et al., 2013) and public organisations are expanding their social media presence. Such practices are said to be illustrative of broader patterns of

so-called *voluntary accountability*, where public organisations are increasingly found to seek accountability (via a variety of self-initiated mechanisms), beyond and above formal mandated obligations. In a variety of institutional settings and at both national and supranational levels, public bodies have been found to voluntarily bind themselves to new ties (Busuioc, 2013; de Boer, 2021; Koop, 2014; Schillemans, 2011). From a principal-agent perspective, such organisational behaviours are described as counter-intuitive (Koop, 2014), as this perspective expects organisations to ‘try to defy, duck, or game accountability obligations’ (Schillemans & Busuioc, 2015, p. 203).

Reputational considerations are said to have considerable purchase power in terms of explaining these unexpected patterns (Busuioc & Lodge, 2016, 2017). Voluntary accountability practices are understood to play an important role in bolstering organisational support. Such practices can serve to allow organisations to “court” and cultivate support from broader audiences (beyond hierarchical principals and formal account-holders) – a crucial element to successful reputation-building and informal authority in governance. Public organisations are thus theorised to endorse accountability-seeking practices ‘where they see them as helpful in advancing their reputation and managing “reputational risk”’ (Busuioc & Lodge, 2016, p. 253).

5.2.1 DOES TWITTER MEET THE ACCOUNTABILITY THRESHOLD?

The effects of these developments and their implications for accountability in modern governance are poorly understood. On the one hand, as noted above, the use of social media by public bodies could contribute to improving public accountability. More specifically, social media can serve as a voluntary form of horizontal accountability – where agencies interact with forums that stand on an equal footing such as clients, users, regulatees, organized interests, the media and the public at large – which has been theorised to offset shortcomings of traditional modes of accountability (Schillemans, 2011). Social media improves citizens’ access to government information in a cost-effective manner. When more information is available, citizens are better able to monitor what their government is doing and citizens may use their voice to correct public bodies when they do not meet their expectations (Bertot et al., 2012; Karré & Vanhommerig, 2014). As Kim and colleagues write, one purpose of social media usage in the public sector is ‘making public information be open and easily accessible to the citizen to *promote accountability*’ (Kim et al., 2015, p. 339, emphasis added). Moreover, social media can be seen as part of the public sphere in which critical debate about the functioning of public bodies takes place (Ojala et al., 2019). Thus, in a way that is perhaps not entirely dissimilar from a voting station, a newsroom, a parliament building or a courthouse, such platforms could potentially provide a space for judging the actions of government. For instance, Jackson and Welles (2015, p. 936) describe Twitter as ‘a space that offers unique possibilities for public debate among activists, citizens, and media-makers seeking to define and redefine the role of the state in civil society.’ This description closely matches with how Willems and Van Dooren (2012, p. 1018) describe accountability forums: ‘[A] virtual meeting place where ideas, views or arguments of a set of actors on a particular issue can be exchanged.’

However, for accountability to materialise, public bodies not only need to release information but undertake actual *engagement* with audiences. As Bovens (2007, p. 451) notes in his influential account, '[a]ccount giving is more than mere propaganda, or the provision of information or instructions to the general public.' It requires not only the provision of information but actual *explanation* or *justification* of actions and decisions (from which consequences can follow). Accountability is closely linked to answerability, a key element which differentiates it from mere transparency (or information provision). In other words, accountability requires, at a minimum, that information provision leads to discussion (debate) with the agency's audience.

Even when this requirement is met, the quality of accountability may be higher or lower depending for instance, on the quality of the information provided or the relevance of the topics discussed. While our indicators do not incorporate the quality of information or debate, they do capture a minimum requirement for such practices to meet the accountability threshold: whether information provision results in debate. The extent to which the information provided leads to actual forum engagement allows us to gauge whether social media use is an organisational commitment to accountability or mere one-sided propaganda amounting to little more than a "monologue without engagement". In line with the descriptions of social media above, we hypothesize:

H1a: Information provision by EU agencies leads to discussion on Twitter. (Minimum accountability threshold present)

On the other hand, such practices could simply be reflective of little more than presentational strategies. Public organisations are recurrently found to invest considerable effort to present themselves in a positive light in order to court broader audience support and/or in an attempt to avert reputational risk. Given that agencies voluntarily use social media platforms, they could well strategically shape their use thereof for entirely self-promoting purposes: releasing information on Twitter to strictly advertise successes, ignore negative comments and generally afford little by way of explanation or justification – in other words, use social media in ways that affords little to no accountability. Koop (2014) for instance, found in her study that the consequences of voluntary accountability procedures introduced by agencies generally tended to be weaker (with little or no consequences) compared to those of their statutory counterparts. Moreover, by their very nature, voluntary practices are less coercive/stringent as they can be adopted as well as abandoned by agencies (Koop, 2014).

Optimistic accounts on the promise of social media for promoting accountability typically see transparency and accountability as "matching parts", 'meaning they are separable but complementary' (Hood, 2010, p. 989). That is, more information or better access to public information (i.e., transparency) is regarded as a catalyst for enhancing the scrutiny of public power (i.e., accountability). However, if merely undertaken for strategic and presentational purposes, the relationship between transparency and accountability may get troubled. Under this condition, transparency and accountability may well be an "awkward couple", 'meaning they

involve elements that are not only separable but by no means always combine to produce good governance, and indeed can be in tension at least sometimes' (Hood, 2010, p. 990).

Research on social media has documented such “awkward couple” relationships. Although these studies do not explicitly discuss their findings in terms of accountability, various studies have shown that public sector organisations do disseminate information through social media, but at the same time are very reluctant to promote dialogue with their stakeholders. Mergel (2017) writes in this regard that public institutions rarely ‘ask citizens for individual input, engage them in back-and-forth discussions to gain a deeper understanding of citizens’ needs, or provide direct feedback to citizen questions or individual requests’ (p. 490) – something that has been called ‘a missed opportunity’ (Manetti et al., 2017, p. 1006). In an exploratory, small-N study about social media usage by cities in the Phoenix metropolitan area, Hand and Ching (2014) find that the number of posts on social media appears unrelated to engagement from citizens, which, according to the authors, suggests that social media is an instrument in the hands of government to speak “truth from power” rather than an instrument through which citizens can speak “truth to power”. As they explain: ‘We expected a somewhat linear relation between the number of posts and the number of comments: namely, the more posts a city makes, the more comments they would generate. However, this relation was not the case and could indicate a bias toward speaking-from power if the posts by the city are not conducive to inviting citizen comment’ (Hand & Ching, 2014, p. 372). Thus, in light of the above, and in contrast to our initial hypothesis, we could expect that the accountability threshold is not met. More formally:

H1b: Information provision by EU agencies does not lead to discussion on Twitter. (Minimum accountability threshold absent)

Theoretically, these developments can cut either way – it is an open empirical question as to which of these scenarios materialises and to what extent.

5.2.2 STRATEGIC TRANSPARENCY AS A REPUTATIONAL STRATEGY

Reputation literature has theorised that while reputational considerations can spur voluntary accountability, at the same time, organisations will attempt to control the terms of accountability. After all, accountability is ‘potentially risky, especially as future repercussions are uncertain’ (Busuioc & Lodge, 2016, p. 254). The *voluntary* nature of such arrangements affords organisational actors opportunity to strategically attempt to manage account-giving and minimise potential costs by signing up to procedures that are less stringent or that allow organisations to present themselves in a positive light: ‘[O]rganizational actors would ideally aim to reap the reputational benefits of accountability while lowering the associated potential costs’ (Busuioc & Lodge, 2016, p. 254).

In light of this, we expect that agencies’ appetite for information provision on Twitter will be driven by their expectations about the likely consequences. Agencies are likely to provide more information when they expect positive consequences to ensue from the interaction. In other words, to the extent to which these practices meet the accountability threshold (i.e., information provision is associated

with debate, see H1a above), we expect agencies to invest in strengthening accountability ties only in so far as they expect these to have positive reputational benefits for the organisation.

H2: When agencies can expect more positive consequences to follow from the provision of information, they provide more information.

5.2.3 WHICH AGENCY CHARACTERISTICS?

Next, we further set out to investigate whether specific agency characteristics might lead them to be more active on Twitter. Reputation literature has suggested that agency characteristics are important determinants of the degree to which agencies get exposed to reputational threats (Boon, Salomonsen, & Verhoest, 2019). Consequently, some agencies might be more eager voluntary account-givers than others, as account-giving offers opportunities for such organisations to present themselves in a positive light, potentially offsetting/minimising reputational risk.

As a norm of ‘appropriate behaviour’ and an ‘icon’ of modern governance (Bovens, 2007), accountability (or, more precisely, being perceived as accountable) can bring important reputational benefits to organisations. Therefore, agencies can be expected to seek accountability by means of social media usage as a strategy to manage reputational risk and build audience support (Busuioc & Lodge, 2016). The pattern is hypothesised to be more prevalent among agencies faced with heightened reputational risk – i.e., among more salient agencies due to increased attention, visibility and political controversy.

H3: EU agencies subject to greater political salience provide more information on Twitter.

At the same time, accountability-seeking behaviour is also said to be an important strategy for ‘actors facing recurrent “moral” criticism regarding their lack of a democratic mandate to take potentially far-reaching decisions’ (Busuioc & Lodge, 2016, p. 253). As non-majoritarian bodies, the proliferation of agencies and relatedly, the rise of the unelected (Vibert, 2007), has given rise to significant legitimacy concerns by virtue of their thin democratic base. Allegations of democratic deficits in this respect are especially pronounced for agencies endowed with higher levels of independence (Maggetti, 2010). In order to “prove them wrong”, independent agencies could embrace voluntary practices, such as social media usage, to publicly demonstrate their commitment to transparency and accountability. As such, agencies can try to use social media as a short-cut to democratic legitimacy (i.e., advancing accountability directly to the citizenry instead of their political representatives).

H4: More independent EU agencies provide more information on Twitter.

Such criticism will also be especially emphasised for agencies able to exercise far-reaching powers. At the EU level, agencies exercise a variety of tasks, but EU agencies with the most influence on European policies and national economies are regulatory in nature. We therefore expect account-giving on Twitter to be especially emphasised for EU agencies that are endowed with regulatory

powers. Accountability concerns are said to be especially relevant for such bodies, by virtue of their far-reaching powers (Busuioc, 2013), potentially then giving rise to agency compensatory efforts in this respect through social media.

H5: Regulatory agencies provide more information on Twitter.

5.3 DATA AND METHOD

The hypotheses are tested in the context of EU agencies. The EC has an official policy, encoded in the Communication Handbook for the EU Agencies (European Commission, 2013), to encourage EU agencies to use social media as a tool for promoting engagement. This handbook instructs EU agencies for instance to not ‘be afraid to ask questions of your audiences – social media is a fast, cheap and efficient way of gauging responses to ideas, hearing opinions and learning what your audience wants/expects from you’ (European Commission, 2013, p. 29). As all EU agencies fall under this policy, differences in formal policies can be ruled out as a factor explaining variability in agencies’ behaviour on Twitter. As such, the case of EU agencies provides a particularly revealing window into *agencies’ (internal) organisational rationales* for using social media. As such, this provides us with a unique opportunity to systematically and robustly investigate our puzzle in the context of a relatively structurally similar population of public bodies, exercising consequential public tasks. An additional benefit of this case selection is that all EU agencies have an active Twitter account, which reduces the problem of missing data. In total, 44 EU agencies are included in this study.⁸ Although this case selection has clear advantages, it may have implications for the generalizability of this study. In the concluding section of this chapter, it will be discussed how our choice of focus and institutional setting affects the generalizability of the results beyond the EU agency population.

EU agencies’ Twitter handles were retrieved by conducting a manual search on Twitter, using the agency’s name or acronym as search terms. All tweets from EU agencies (30,857) (excluding retweets) and replies to EU agencies (8,389) during a 24-month period (between January 1, 2018 and December 31, 2019), in English, were downloaded. The tweets were filtered on the English language as we use machine learning to analyse the sentiment and currently the most powerful models are trained in English. From this data, we constructed three indicators, each of which corresponds to a different accountability phase.

8 See the website of the EU Agencies Network (<https://euagencies.eu/>) for a list of EU agencies. All members of the EU Agencies Network are included in this study, with the exception of agencies that were not yet officially established at the time (the European Public Prosecutor’s Office, the European Labour Authority and the European High Performance Computing Joint Undertaking) and one agency that joined Twitter later than 1 January 2019 (the European Union Satellite Centre). One agency (Eurojust) joined Twitter in October 2018, which means that observations for some months are missing. It should further be noted that some EU agencies (e.g., EFSA and Europol) maintain multiple Twitter accounts. In such cases, only the main Twitter account of the agency is included.

5.3.1 MEASURING ACCOUNTABILITY ON SOCIAL MEDIA

As noted above, accountability has three phases: information, discussion and consequences. The three phases were operationalized as follows: First, the *information phase* was measured as the number of tweets sent by an EU agency (excluding tweets in reply to another user's tweet). As each tweet contains information (e.g., text, photographs, videos, links), this measurement captures information that is provided by an agency. Not every tweet is of course equally informative. However, even when an agency releases only little information in a tweet, this can already be a way to "jump-start" the accountability process. As such, each agency tweet has the potential to develop into an instance of accountability. It should be noted that EU agencies sometimes reply to their own tweets. Typically, EU agencies do this because they cannot fit all information in a single tweet due to the platform's restrictions on the length of tweets (280 characters). As those tweets serve to provide information, they are included in our indicator for the information phase.

Second, the *discussion phase* was measured as the number of user replies. A user reply is a tweet sent in reply to an agency tweet. As noted by Bovens (2007), the discussion phase pertains to the 'possibility for the forum to interrogate the actor and to *question* the adequacy of the information or the legitimacy of the conduct' (Bovens, 2007, p. 451, emphasis in original) and is semantically closely connected to the concept of answerability. By replying to agency tweets, Twitter users can question the validity of the information provided and give feedback on the information shared in the agency's tweet. Hence, a frequency count of user replies can be regarded as a suitable measure of the intensity of interactions between the actor and the forum after information provision.

Third, the valence of user replies was used as the indicator for the *consequences phase*. This can be thought of as a measure of (reputational) consequences (Maor & Sulitzeanu-Kenan, 2013). Although consequences can take many forms, this measure is appropriate in the context of this study as consequences from accountability processes on social media are largely informal and reputational. Although reputational consequences are often considered to be 'weak' (Willems & Van Dooren, 2012, p. 1022), a recent experimental study found that reputational sanctions are almost equally important as financial ones for determining forum prioritisation (Aleksowska et al., 2022). In the context of social media, several accounts point at the importance of reputational risks faced by public sector organisations who pursue online visibility. For instance, the European Commission (2013, p. 29) notes in its handbook that 'any criticism received on social media is very open/accessible to a large audience' and EU agencies 'need a crisis plan' for this reason. Moreover, there have been several instances in which public agencies faced (severe) reputational consequences from giving account on social media. For example, when the New York City Police Department launched a campaign that asked citizens to provide their experiences with the police department using the hashtag "myNYPD", the campaign led to severe reputational losses for the organization because people used the hashtag to share harmful stories demonstrating police brutality (Jackson & Welles, 2015). In a very similar case, the European Border and Coast Guard Agency (Frontex) announced a photo competition in celebration of Europe Day, which inspired many Twitter users, including non-governmental organisations like Sea Watch International, to share stories about instances of fundamental rights violations by the agency under the hashtag "ContestOfShame".

To determine the reputational consequences of account-giving on Twitter, we conducted a sentiment analysis using a state-of-the-art machine learning language model based on a deep learning architecture called a transformer. Namely, we use a pretrained version of BERT (Devlin et al., 2019), which stands for Bidirectional Encoder Representations from Transformers. Language models are trained on large amounts of text data usually from online sources (such as Wikipedia and Twitter). Transformer language models are powerful as they model natural language, giving them an understanding of grammar and context, which are very important for language tasks like sentiment analysis. This gives them an important advantage over alternative dictionary-based sentiment analysis models, which have a limited understanding of context. Importantly, transformer models can first be trained on very large datasets that are not necessarily related to the domain of interest – to gain broader language understanding – and then fine-tuned on a specific task with much smaller datasets. These language models are very large; in our case the model has 135 million parameters. The model we use is from the library *pysentimento* (Pérez et al., 2021), which provides a fine-tuned model trained on a Twitter sentiment dataset. BERTweet (Nguyen et al., 2020) is the base model on which the fine-tuning is performed. This is a BERT model trained on 80 gigabyte of Twitter data containing 850 million tweets. The advantage of using this model, as opposed to models trained on more traditional texts like Wikipedia, is that it is trained specifically on Twitter data where any one tweet is often shorter than traditional text, can use improper grammar and can use many special characters such as hashtags, mentions and emojis. The model is therefore especially well-suited to our specific task. The model outputs three probabilities representing positive, negative, and neutral, with the largest probability representing the final sentiment classification. The model has a reported average recall of 73.2 on the SemEval2017- Task4A test set. The tweet extraction and implementation of the sentiment algorithm were performed in Python.

The classification of the tweets provided by the sentiment algorithm was used to construct a measure of *expected consequences*. We used the formula shown below (adapted from Maor & Sulitzeanu-Kenan, 2013, p. 56) to calculate what reputational consequences an agency had experienced in the previous 12 months. We rely on a 12-month period to filter out possible seasonal effects. The formula produces a score between -1 (maximal reputational sanctions) and +1 (maximal reputational rewards). A value of 0 represents a perfect balance between positive tweets and negative tweets. The score reflects whether the agency's audience on Twitter has been favourable (i.e., positive score) or hostile (i.e., negative score) towards the agency in the past 12 months. As most EU agencies actively monitor what is being said about their agency on Twitter, an agency's recent experiences with receiving comments on Twitter will most likely influence its *expectations* about how Twitter users will respond to new information. This implies that when the ratio between positive comments and negative comments changes over time, an agency will presumably change its expectations about the most likely reputational consequence of posting information accordingly.

$$\text{Expected consequences} = \frac{\sum \text{Positive comments in previous 12 months} - \sum \text{Negative comments in previous 12 months}}{\sum (\text{Negative comments, neutral comments, positive comments in previous 12 months})}$$

5.3.2 OTHER VARIABLES

Political salience was operationalised as the number of written questions from the EP to the EC during the 8th parliamentary term (2014-2019) that address an agency. Written questions are an important oversight mechanism, which MEPs can use at their own discretion (Font & Pérez-Durán, 2016). The number of parliamentary questions is a conventional measure of political salience (Koop, 2011). However, as noted by Rimkutė (2020a, p. 395), this measurement also has a strong reputational component: '[T]he number of parliamentary questions directly addressing a specific EU agency [can be regarded] as a proxy of the agency's exposure to multiple competing audiences that impose conflicting expectations on the agency and, in so doing, higher reputational threats.' The distribution of this variable was found to be highly skewed and therefore log-transformed.

Formal independence was measured with an index score based on fourteen indicators. Data was collected in 2019 by manually coding EU agencies' founding regulation. Most indicators were derived from the independence index created by Wonka and Rittberger (2010). Yet, we modified the index in accordance with the recommendations provided by Hanretty and Koop (2012). For instance, we removed variables pertaining to the breadth of an agency's competence rather than an agency's independence. Additionally, we adjusted or removed indicators that unwarrantedly rely on the assumption that the absence of provisions is equivalent to low independence, as well as indicators with very little variance or many missing observations. After data collection, we used a Bayesian factor analysis technique for ordinal data (Quinn, 2004) to derive the final score. This approach effectively models formal independence as a latent trait, which improves measurement (Hanretty & Koop, 2012). This is particularly important when using formal independence as a predictor. Hanretty and Koop (2012, p. 211) write that such approach is 'crucial for those who use the formal independence of regulatory agencies as an independent variable, for here measurement error will bias the coefficients obtained.'

We use a dummy variable to capture whether an agency has *regulatory tasks* or not (adopted from Rimkutė, 2020a). In contrast to Rimkutė (2020a), but in line with the definition of regulation provided by Koop and Lodge (2017), we classify the Single Resolution Board (SRB) as a regulatory agency because this agency has some independent capacity to take intervening decisions and to monitor the execution of resolution schemes.

We include two control variables in the analysis. First, we control for organizational budget – measured as the total agency appropriations in 2019 – because EU agencies with more financial resources likely have greater capacity to invest in social media (e.g., hiring external consultants, dedicated staff, access to social media monitoring software). This variable was log-transformed to reduce skewness. Second, fixed effects for months are added to account for time trends.

5.3.3 ANALYSIS

Our dataset contains monthly observations nested within EU agencies. Using the `glmmTMB` package in R (Brooks et al., 2017), Generalized Linear Mixed Models (GLMM) were fitted. To account for time-dependence, we modified the error covariance structure. We selected an AR1 covariance matrix structure. This means that we assumed correlations between adjacent months to be highest, with the strength of the correlations decreasing when time points (i.e., months) are further removed from each other. Comparing models with different covariance structures confirmed that AR1 is an appropriate covariance structure for our errors.

An important topic when using multilevel models is the choice between centring within clusters (CWC), where the variable is deviated around the mean of the cluster j (i.e., EU agency) to which case i (i.e., monthly observation) belongs, and centring at the grand mean (CGM), where the variable is deviated around the population mean. Following Enders and Tofighi (2007), we ran regression models in which the level-1 predictors are centred within clusters to test the hypotheses pertaining to level-1 predictors (hypothesis 1 and 2). To test the hypotheses regarding agency characteristics (i.e., level-2 variables; hypotheses 3-5), we ran models with the level-1 variable centred at the grand mean. As noted by Enders and Tofighi (2007), this strategy allows one to address different types of research questions within a single study. All continuous level-2 variables are centred as well.

As both dependent variables (i.e., ‘information’ and ‘discussion’) are count variables, OLS regression would yield unsatisfactory outcomes (Hilbe, 2014). We use a Poisson model, as tests showed that our models are not extra-dispersed, not suffering from excessive zeros and performing equally well as, or better than, alternatives such as negative binomial models and zero-inflated models (see appendix 5.A for negative binomial models).

5.4 FINDINGS

Table 5.1 provides a descriptive overview of the variables included in the analysis prior to transformation and centring. During an average month in 2019, EU agencies sent approximately one tweet per day, weekends included, and they received approximately 10 replies. However, the *median* value of replies to EU agencies (our measure of *discussion*) per month is 2 and the *modal* value is 0 (not shown in table). Thus, EU agencies receive very few or no replies in a typical month. To get a sense of the consequences of being active on Twitter, it is interesting to look at the outcome of the sentiment analysis. The sentiment algorithm classified 2210 tweets (26.3%) as positive, 2926 tweets (34.9%) as neutral and 3253 tweets as negative (38.8%). Thus, a reply to an EU agency is most likely to be negative. However, Table 5.1 shows that the mean value and median value of *expected consequences* are positive. This indicates that, in most months during the time period under examination (i.e., 2019), EU agencies were discussed in slightly positive terms in the preceding 12 months.

■ **Table 5.1: Descriptive statistics**

	n	Mean	Std. dev.	Median	Range (min-max)
Information	519	29.881	27.171	22.000	214 (0-214)
Discussion	519	10.127	47.338	2.000	834 (0-834)
Expected consequences	519	0.156	0.376	0.125	2 (-1-1)
Political salience	44	40.432	71.978	16.500	305 (0-305)
Formal independence	44	0.110	0.852	0.310	3.25 (-1.39-1.86)
Regulatory task	44	0.568	0.501	1.000	1 (0-1)
Budget	44	162.066	228.170	84.800	1206.1 (4.9-1211)

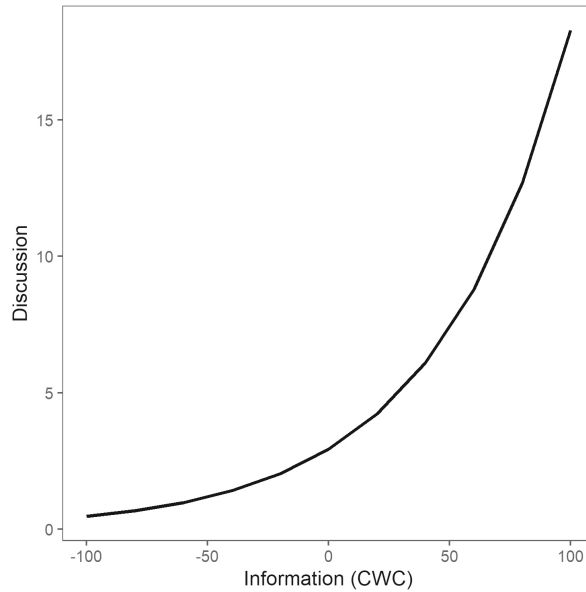
■ **Table 5.2: Generalized Linear Mixed Models (GLMM) with AR1 covariance structure**

	Information		Discussion
	Model 1.0	Model 1.1	Model 2.0
(Intercept)	2.963 [2.516; 3.410]	2.956 [2.502; 3.410]	1.309 [0.631; 1.986]
Expected consequences (CWC)	0.319 [-0.003; 0.642]		
Expected consequences (CGM)		0.233 [-0.069; 0.536]	
Information (CWC)			0.018 [0.013; 0.024]
Political salience (log)	0.121 [-0.023; 0.265]	0.137 [-0.011; 0.286]	0.401 [0.189; 0.612]
Regulatory task (ref.: no regulatory task)	-0.370 [-0.998; 0.258]	-0.350 [-0.989; 0.290]	-0.210 [-1.113; 0.693]
Formal independence	0.197 [-0.130; 0.524]	0.216 [-0.118; 0.550]	-0.140 [-0.611; 0.331]
Budget (log)	0.041 [-0.088; 0.170]	0.042 [-0.089; 0.173]	0.182 [-0.004; 0.367]
Formal independence x Budget (log)			0.278 [0.027; 0.528]
Month fixed effects	Yes	Yes	Yes
AIC	4115.693	4117.356	2649.459
Log Likelihood	-2037.846	-2038.678	-1303.729
Num. obs.	519	519	519
Num. groups: acronym	44	44	44

Note: Table entries are regression coefficients, with 95% confidence intervals in square brackets. Estimation was done with Restricted Maximum Likelihood (REML). Bold values are significant at the 0.05 level. All models are Poisson models. CGM = centring at the grand mean; CWC = centring within clusters.

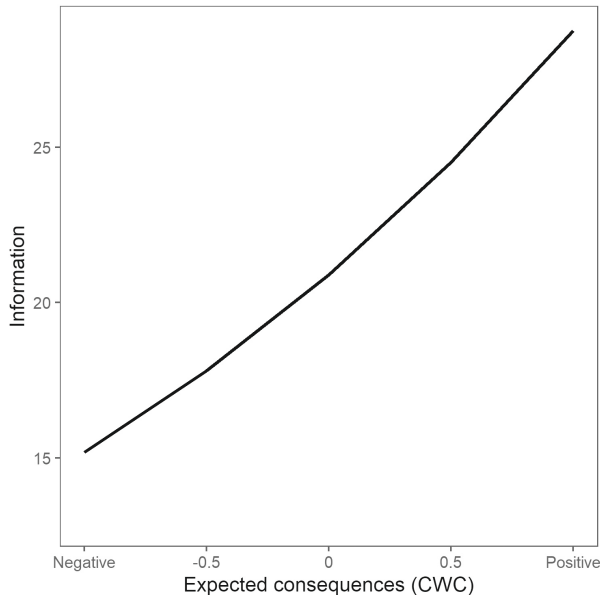
Table 5.2 presents the results from the regression analysis. Model 2.0 tests whether information predicts discussion, controlling for a series of organizational characteristics. The relationship between information and discussion is highly significant ($p < 0.001$) and positive. Thus, we find *strong support for hypothesis 1a*. Predicted values are shown in Figure 5.1 below.

■ **Figure 5.1 Predicted effect of information on discussion (model 2.0)**



Model 1.0 lends *cautious support to hypothesis 2*, as *expected consequences* is borderline significant ($p = 0.053$) and the effect is in the expected direction. Note that *information* has been centred within clusters in model 1.0, which removes all between-agency variation from the predictor. Thus, an EU agency is *more likely to provide information when the consequences following information provision can be expected to be more positive* than normal for that specific agency. Predicted values are shown in Figure 5.2.

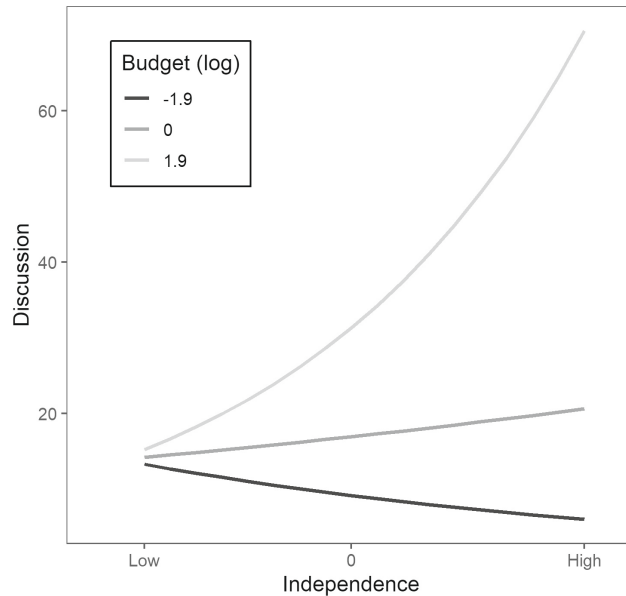
■ **Figure 5.2 Predicted effect of expected consequences on information provision (model 1.0)**



We do not find strong evidence for the influence of agency characteristics on information provision (model 1.1). Hypothesis 3 stipulated that political salience is associated with more information provision. This relationship is marginally significant ($p = 0.07$) and in the expected, positive direction. Hypothesis 4 – more formal independence is associated with more information provision – is not supported by the data ($p = 0.205$), although the relationship is in the expected direction. Having regulatory tasks does also not significantly lead to more information provision ($p = 0.284$), which means that hypothesis 5 needs to be rejected.

In terms of the control variables, there are several agency characteristics that explain the level of discussion (see model 2.0). EU agencies subject to greater political salience are significantly more discussed on Twitter ($p < 0.001$). The level of formal independence and the size of the budget do not have an independent significant effect on how much EU agencies are discussed on Twitter (although *budget* is marginally significant with $p = 0.055$), but we do find an interaction effect between these predictors ($p = 0.03$). Figure 5.3 shows the relationship between *formal independence* and *discussion* at three values for the log-transformed variable *budget*: one standard deviation below the mean, the mean and one standard deviation above the mean. The relationship is best described as exponential growth for EU agencies with a relatively high budget, as linearly positive for EU agencies with an average budget and as linearly negative for EU agencies with a relatively low budget. Note that inclusion of the interaction term in model 2.0 does not change our finding with regards to hypothesis 1.

Figure 5.3 The moderating effect of logged budget on the relationship between formal independence and discussion (model 2.0)



Note that GLMMs provide *subject-specific* coefficients. As a result, interpreting the effects is somewhat more complicated than usual. Incidence risk ratios (IRR) can still be obtained by exponentiating the coefficient. However, the IRR relates to change within the subject (i.e., EU agencies in our case) and does not reflect change in the population. To illustrate, our findings show that an EU agency that improves one unit on our indicator for expected consequences (e.g., receiving only positive tweets in the past 12 months when that agency has on average a history of being discussed neutrally – that is, it has a cluster-mean of 0) is expected to send 37.6% more tweets, given a constant value for the other predictors (model 1.0). We also find that if the number of questions from the EP in which an EU agency is mentioned would double in comparison to the situation during the 8th parliamentary term, that agency is expected to post 14.7% more tweets, holding all other predictors constant (model 1.1). Furthermore, an EU agency is expected to receive 1.8% more replies in a specific month for each tweet that it sends in that month in excess of its monthly average, given a constant value for the other predictors (model 2.0).

5.5 DISCUSSION AND CONCLUSION: “I DID IT MY WAY” - VOLUNTARY ACCOUNTS BUT “ON OUR TERMS”

As public bodies increasingly embrace the use of social media, the potential implications of these developments for public accountability remain understudied. Our study takes a first step – on the basis of a novel quantitative measurement – to empirically investigate, and reflect on, effects of the use of social media for public accountability.

Before presenting the main lessons that can be drawn from this study, we first note some considerations for building on our work. While our case selection comes with clear advantages (see method section), our focus on EU agencies may have implications for the generalisability of our results. While our study covered a broad array of public bodies operating across different policy areas, the EU can be considered an “unsettled polity” in which accountability relationships are in flux (Olsen, 2013), which may render EU agencies more entrepreneurial than other agencies (Busuioc & Rimkutė, 2020a). Future studies could further build on our findings through comparative research focused on public agencies across different jurisdictions to corroborate how far these findings travel across different polities. To that end, our study offers important starting points to guide future investigations in different contexts. Moreover, it is important to note that while an important contribution of our measure is that it allows scholars to investigate when practices meet a minimum accountability threshold, it does not allow us to speak to the *quality* of this interaction. Future researchers could further supplement our set of accountability indicators with additional ones that pertain to the quality of accountability on social media and/or complement our findings with in-depth qualitative investigations.

A first finding that emerges from our analysis is that social media can be regarded as an accountability instrument, albeit not a neutral one. The findings indicate that voluntary accountability – in which the actor chooses to commit to accountability on its own terms – cannot be relied on when account-giving is not beneficial for the actor. Only when there is some clear benefit (i.e., the expectation of positive reputational rewards in our case), is voluntary accountability likely to emerge. All in all, the findings give some reasons to be optimistic about the potential promise of social media for promoting accountability, but at the same time, one may question what accountability is worth when it is done for strategic reasons – only when positive consequences are to be expected. We will outline the reasons for optimism and pessimism in more detail.

Several findings give reason for optimism. Our study finds that information provision sparks interactions between EU agencies and their audiences, which means that Twitter presence is *not* a monologue without engagement. Consequently, Twitter meets the “minimum threshold” for a practice to qualify as accountability. It matters whether EU agencies are active on Twitter or not for their accountability. This suggests that investing in social media presence, such as Twitter, may help public agencies to expand their engagement with citizens, possibly mitigating to some degree democratic deficiencies pertaining to their insulated, non-majoritarian nature (Schillemans, 2011).

In addition, we find that several agency characteristics are associated with discussion on Twitter. Although we did not formulate hypotheses about these relationships, they do reveal interesting patterns. The significant association between *political salience* and *debate* on Twitter indicates an alignment between the EP and the general public with regards to what agencies they consider important. This can be considered an encouraging finding from a democratic perspective. The interaction effect between formal independence and budget size can be interpreted in a similar positive way. Legitimacy problems are most severe when an agency is independent *and* has the capacity/power to act (Maggetti, 2010; Majone, 1999). Organisational budget may be considered a proxy for the latter aspect. As shown above, independent EU agencies with big budgets are most likely to be discussed on Twitter, which seems to suggest that the public focusses most on those agencies for whom accountability is at its most pressing.

At the same time, and on a more pessimistic note, our findings simultaneously indicate that agencies “seek accountability” on Twitter to the extent that they can control, constrain or limit the negative repercussions thereof. Although with some uncertainty, our regression models indicate that EU agencies are more likely to provide information when comments in previous months were more positive than usual. In other words, the provision of information by EU agencies is *conditioned on the expectation of positive consequences*. Agencies provide information – if and when – they expect this will result in positive reputational benefits. Anecdotal evidence provides some relevant illustrations for the patterns we observed quantitatively in our study. For instance, Europol mentions “brand awareness” and “brand reputation” explicitly as objectives of its social media strategy. They write, ‘Europol’s social media content will help expand the organisation’s current positive reputation online, and *will counter any negative perceptions that may exist with a rapid and effective response*’ (Europol, 2019, p. 4, emphasis added). Social media presence can also serve to counter-act objections and critiques from formal institutional account-holders. For example, when the European Court of Auditors, an important institution of accountability in the EU institutional landscape, criticised the European Asylum Support Office (EASO) for having a low presence in news media, which the European Court of Auditors sees as an indicator of accountability (ECA 2020), the EASO rebutted this critique by emphasizing its presence on social media as a way to fend off criticism from a formal account-holder: ‘EASO notes that it places a very high amount of focus on social media presence, in addition to traditional/online media. EASO is aware that the modern citizen has a short attention span and generally gets his/her news from his/her Facebook or Twitter account, rather than traditional media. In this regard, EASO populates its accounts continuously and has a strong audio-visual record, producing regular content to convey its activities and mandate to citizens on social media’ (European Court of Auditors, 2020, EASO reply (paragraph 64)).

These patterns are consistent with a broader literature on bureaucratic behaviour, which has convincingly argued that agencies are not “passive recipients” but actively attempt to shape audience expectations and the controls they are subject to. Agencies actively ‘attempt to define the terms on which they should be made accountable, and in effect to define the parameters of blame’ (Black, 2010, p. 337; see also Potter, 2019). The same is true, our study suggests, when

it comes to their Twitter presence. The observed pattern also confirms the importance of “reputational histories” (Salomonsen et al., 2021), as it demonstrates that EU agencies “remember” how Twitter usage plays out for their reputation and take these experiences into account when deciding on whether to “talk” or “keep silent” on Twitter in the future (Maor et al., 2013).

Furthermore, we do not find strong support for the influence of agency characteristics, suggesting that concerns about the legitimacy deficit of EU agencies with far-reaching powers do not stimulate these agencies to make more active use of Twitter in order to compensate for their thin democratic base. Yet, we do find moderate support for the influence of political salience. Politically salient agencies – compared to less salient agencies – are more often pressured to explain and justify their work. Thus, the positive relationship between political salience and information provision may be interpreted as indicative of the enhanced institutional pressures such bodies experience to render voluntary accounts to broad audiences (Koop, 2014; Olsen, 2013). At the same time, high political salience often reflects that an agency is controversial and facing multiple expectations, which can cause serious reputational risks. As with public communication through traditional media (Horsti, 2012; Müller & Braun, 2021), communicating *pro-actively* on social media may help such agencies create a legitimating discourse, build broader public support that may function to pre-empt criticism and act as a counterweight against mandated controls (Bertelli & Busuioc, 2021). Paradoxically then, in the hands of strategic actors, these new practices (especially so if predominantly “activated” when positive rewards are expected), rather than affording means of control and accountability over the public body in question, can allow actors a measure of control over their accountability more broadly, potentially placing them “in control” rather than “under control”.





CHAPTER 6

| Conclusion and Implications

This chapter concludes and reflects upon the implications of this dissertation. To start, a detailed answer to each sub-question is formulated in section 6.1. Building on the answers to the individual sub-questions, section 6.2 answers the main research question. Section 6.3 discusses the limitations of the dissertation. The two remaining sections of this final chapter focus on the implications. The relevance of the findings for the literatures on accountability, reputation, EU agencies and regulatory governance are discussed in section 6.4. This section also indicates future avenues for research in each of these areas of study. The implications for society and practice are highlighted in section 6.5.

6.1 ANSWERING THE SUB-QUESTIONS

The main research question of this dissertation was broken down into four separate sub-questions. The first research question focused on the meaning and conceptual boundaries of voluntary accountability and read as follows: *How can voluntary accountability be understood conceptually and analysed?* This sub-question was addressed in chapter two. It was argued that while established accountability frameworks have proven to be very useful analytical tools for studying accountability, there seems to be a misfit between these frameworks and the widely empirically documented phenomenon of voluntary accountability. While acknowledging that accountability could be voluntary, these frameworks put much emphasis on the existence of an “obligation”, thereby providing a too narrow view of the possible motivations that drive this phenomenon, because they assume that the account-giver must feel (normatively) obliged to render account when account-giving occurs in the absence of a formal obligation. A new definition of voluntary accountability was proposed: *A relationship between an actor and an engaged forum, in which the actor voluntarily commits itself to offering information on, and explanation of, its conduct and may face consequences.*

While this new conceptualisation of voluntary accountability does not refer to “an obligation”, it is equally narrow as established frameworks in terms of conceptual boundaries in order to enhance conceptual clarity. It was emphasized that accountability – regardless of whether it is mandatory, voluntary or somewhere in between – constitutes a *social relationship*. Importantly, when accountability is voluntary, the relational nature of accountability is not self-evident as both the actor and the forum must “accept” to play their role as account-giver and account-holder, respectively. The concepts of “actor self-committal” and “forum engagement” were proposed to describe the extent to which both parties in a voluntary accountability relationship fulfil their part. Actor self-committal refers to a voluntary commitment from the actor to accountability, while forum engagement refers to engagement by the forum with the account provided by the actor. Special attention in empirical studies must be paid to assessing the extent to which forums are engaging with the account provided by the actor, because, unlike when accountability is mandatory, there is no *a priori* reason to assume that forum engagement is present. Not doing so would likely lead to an overestimation of the level of agency accountability as practices may be classified as voluntary accountability even though no actual scrutiny by a forum takes place.

This could, in turn, possibly give a false sense of security regarding the state of accountability in modern governance.

This reflects a blind spot in accountability research. It is often assumed – plausibly as a consequence of the strong influence of principal-agent theory on the accountability literature – that forums are interested in the actor’s conduct and want to hold the actor to account if given the opportunity to do so. For a variety of reasons, including time, expertise and biases in the information provided, those to whom voluntary accounts are rendered may be unwilling, or incapable to, engage with the information provided to them. Taking forum engagement into account does not only lead to a much-needed re-narrowing of the voluntary accountability concept, but also points at the need for a more critical stance towards the net effects of actors’ accountability initiative, as it hints points at the possibility that voluntary account-giving is a one-sided effort by the actor with no or limited opportunities for, or actual, dialogue between the actor and the forum. This would perpetuate an illusion of accountability, rather than its manifestation.

To analyse voluntary accountability more accurately, it was proposed to group practices documented in the extant literature in three broad categories. Each category represents functionally different forms of voluntary accountability that diverge based on *to whom* and, relatedly, *how* the voluntary account is rendered. First, the “*message in a bottle*”-type entails account-giving without a specified forum in mind, where the account is geared towards a wider, often unknown, public, which occurs through practices such as press releases/conferences, social media, interactive websites and open data systems. Second, the category of “*a discerning account*” includes practices such as consultative forums, external reviews by stakeholders or peers and user councils, which are aimed at a well-defined, narrow group of often specifically selected stakeholders. Third, voluntary account-giving towards new or existing principals was labelled as “*paralleling the principal-agent relationship*”. It occurs in parallel with mandatory accountability mechanisms through practices such as requests for parliamentary hearings and site visits by politicians. This typology of voluntary accountability practices is a valuable analytical tool. Yet, it is more than just that as it also identifies the possibility that different types of voluntary accountability, and relatedly account-giving to different types of forums, may be driven by different motivations. Rather than searching for a holy grail of one set of matching motivations explaining accountability-seeking behaviour by and large, one should, it was argued, always consider the relational context in which the voluntary account-giving occurs. The main proposition put forward in chapter two is that each type of voluntary accountability is related to a different set of driving motivations. This proposition guided the later stages of the research.

The second sub-question read as follows: *To what extent do the mechanisms advanced in the literature (or others still) spur organisational accountability-seeking behaviour towards different types of audiences?* To answer this sub-question, qualitative data was collected through interviews with top-level managers of EU agencies and a survey with open-ended questions, which was disseminated among high-ranking EU agency officials. The findings largely support the main proposition from chapter two that the motivations behind voluntary accountability

are linked to the type of audience to whom the account is rendered, albeit some links were somewhat different than expected. In total five distinctive motivations were found: democratic motivations, political-strategic motivations (or, more specifically, financial motivations), learning motivations, effectiveness motivations and reputational motivations. Reputational motivations and effectiveness motivations appeared to be particularly important drivers of voluntary accountability, as these drivers matter regardless of who is at the other end of the accountability relationship.

Several insights from the qualitative data gave impetus to the design of the quantitative study described in chapter four. On the side of the “dependent variable” – i.e., voluntary accountability – the qualitative data confirmed that voluntary accountability is a multi-dimensional concept, which comes in many different shapes and forms. It is important to recognize these differences and to analyse different types of voluntary accountability relationships separately, for instance by using the typology presented in chapter two. Furthermore, the interviewees mainly provided examples of practices that can be regarded as a “light” version of voluntary accountability, entailing a strong component of information provision, but not necessarily contributing directly to debate or the formation of judgements. This empirical finding re-emphasizes the need for caution about too high hopes as to the possibility that accountability-seeking can function as a remedy against problems in the public sector. With many practices being adopted that are seemingly far removed from the accountability threshold (which requires an actor-forum interaction), the outcomes may often be disappointing and not living up to the expectations. Consequently, while high levels of self-reported voluntary accountability among EU agencies were found, concerns as to accountability deficits of EU agencies – or the broader population of (semi-)autonomous agencies – remain because at least some practices that have been adopted are best described as low-cost, somewhat symbolic initiatives to become more transparent/accessible rather than full-blown accountability practices. On the side of the “independent variables”, although the findings indicate that voluntary accountability is not driven by a single, coherent set of motivations, explanations derived from bureaucratic reputation theory seem to go a long way towards explaining why EU agencies engage in accountability-seeking behaviour and reputation-informed mechanisms therefore require further testing.

The third sub-question built explicitly further on insights gained from the qualitative analysis and asked: *To what extent do reputation-informed mechanisms explain variation in accountability-seeking behaviour among EU agencies?* This sub-question was addressed relying on survey data to measure voluntary accountability, as well as unobtrusive data that was used to construct relevant indicators. Drawing on the burgeoning literature on bureaucratic reputation, as well as the insights gained through the interviews, reputation-informed hypotheses were formulated about the drivers of voluntary accountability. This chapter provided a first explicit test of the reputational drivers of voluntary accountability. The findings from the quantitative analysis confirmed, but also further refined and expanded, the insights gained from the qualitative analysis. In line with the findings from chapter three and the proposition posed in chapter two, explanatory patterns differed depending on the audience to whom account is rendered. Reputation-informed mechanisms seemed to be most relevant for explaining voluntary accountability towards principals (i.e., “paralleling the principal-agent relationship”-type of voluntary accountability) and the media.

In line with the reputational perspective on accountability, media salience was found to have a positive, statistically significant effect on voluntary accountability, while interest from the EP has a negative, statistically significant effect on voluntary accountability. This suggests on the one hand, that a lack of interest from the EP in formalized oversight activities incentivises EU agencies to *proactively* demonstrate their value and, on the other hand, that voluntary account-giving can function as a *defence mechanism* against possible critique and attacks in the media. No statistically significant effect was found for formal independence, but this is possibly due to the underpowered research design. Consistent with the findings from the qualitative data, learning motivations seem to play a big role when it comes to voluntary accountability towards societal stakeholders (i.e., “a discerning account” in the conceptual framework).

The fourth and final sub-question was: *What explains variation in agency communication on social media and to what extent does the use of social media serve to promote accountability?* This sub-question zooms in on social media – more specifically, Twitter – as a voluntary accountability practice, which following the conceptual framework laid out in chapter two falls within the category of “message in a bottle”. A rich dataset was used in order to overcome some of the methodological issues encountered in the survey study. Moreover, this sub-question also explicitly considers the notion of forum engagement as a key criterion for assessing whether a practice qualifies as accountability. With regards to the question whether social media can be regarded as an accountability instrument, the answer is, based on the criteria from the conceptual framework, that it has the potential to serve as an accountability mechanism. It was found that in months in which an EU agency provides more information on Twitter (measured as the number of tweets posted), there is more discussion of an EU agency on Twitter (measured as the number of responses to agency tweets). Consistent with the conceptual framework of voluntary accountability laid out in chapter two, the “threshold” to be passed in order to speak of accountability is the provision of information by the actor and subsequently some form of engagement from the forum with the account provided by the actor. Importantly, the results also indicate that the provision of information by EU agencies is conditioned on the expectation of positive consequences. Agencies provide more information – if and when – they expect this will result in positive reputational benefits. This again underscores that voluntary account-giving is not always a dependable instrument for safeguarding accountability in modern governance.

6.2 GENERAL CONCLUSIONS: VOLUNTARY ACCOUNTABILITY, A STORY OF FORUMS

The following research question guided the research for this dissertation: *What drives public agencies’ propensity to engage in more extensive practices and/or to initiate more far-reaching mechanisms of accountability than those mandated by law? In other words, what are the drivers of voluntary accountability?* This dissertation documents forums as a key element to the story of voluntary accountability. As voluntary accountability is self-imposed, the forum may not instantly come to mind as the most important factor for understanding voluntary accountability. Yet, the key lesson from this dissertation is that forum plays a crucial role – both conceptually and in

terms of what drives accountability-seeking behaviour. With a nod to Carpenter (2010a), the main conclusion from this dissertation can be summarized as follows: *When trying to make sense of voluntary accountability, look at the forum.*

Our blind eye to the role of the forum in voluntary accountability has been the main source of the conceptual confusion. This dissertation highlights that forum engagement – whether forums respond to account-seeking efforts – is crucial as to whether an actor’s initiative materialises into accountability. Empirically, the identity of the forum was found to be one of the most important explanations as to why a specific driving mechanism becomes activated. More precisely, the analysis of both the interview data and the survey data show that the dominance of a specific mechanism is conditional on the type of forum and the resources the forum can bestow upon the agency. This “motivation-audience link” is one of the key findings from this dissertation. It underscores that accountability outcomes are jointly produced in the interaction between the actor and the forum (Busuioc & Lodge, 2017). This applies to all forms of accountability, regardless of whether it is voluntary or mandatory. Even though voluntary accountability is self-imposed and therefore conditional on the actor’s appetite for accountability, audiences targeted by voluntary accounts are an important part of the answer in unearthing the drivers of accountability-seeking behaviour. Not considering the role of the forum in voluntary account-giving is to deny that accountability is a relational concept.

Furthermore, this dissertation demonstrates that there is no “holy grail” of one set of driving motivations behind voluntary accountability. Instead, voluntary accountability should be understood as driven by a mixture of complementary mechanisms. The distinction between the logic of appropriateness and the logic of consequences has been a focal point in the debate about the drivers of voluntary accountability. While these two logics of action are useful at an abstract level, their distinctiveness is much less clear in practice and a strict distinction does not resonate well with how public managers talk about accountability-seeking behaviour. Empirically, it is almost impossible to clearly separate these two logics. While some motivations suggest strategic calculations of costs and benefits, others are more indicative of norm-following behaviour. Yet, most often these logics are blurry, overlapping and intertwined, making it rather difficult to distinguish between them.

Finally, with regards to the ambition of this dissertation to explicitly confirm or reject reputational considerations as a driver of accountability-seeking behaviour, the findings heavily lean towards confirmation. Notwithstanding that voluntary accountability is driven by a mix of complementary mechanisms, all empirical chapters showed in one way or the other that reputational considerations matter. Chapter three reported that reputational motivations were mentioned most frequently by EU agencies’ top-level managers and that they mentioned this type of motivation in relation to all types of audiences. Chapter four confirmed the importance of reputation as a driver of voluntary accountability through statistical methods. Furthermore, voluntary accountability is likely to emerge only insofar the actor anticipates reputational benefits. As shown in chapter five, actors pursue a strong social media presence to the extent that they

expect that the audience on social media will respond positively towards this communication. Taken together, these results provide strong evidence that reputation is an important, albeit not exclusive, driver of voluntary accountability. Importantly, this is not to say that voluntary accountability should be regarded as following from one specific logic of action (i.e., appropriateness vs. consequences). Actors may use accountability strategically, but they may also come to internalize audience expectations about accountability and act in line with these expectations because they believe it is socially desirable (Busuioc & Lodge, 2016; Maggetti & Papadopoulos, 2018).

6.3 LIMITATIONS

The research conducted for this dissertation inevitably has limitations that should be taken into account. First, measuring voluntary accountability has proved to be challenging and each operationalisation in the empirical part of the dissertation has its imperfections. All efforts were taken to minimize social desirability bias, for instance by granting anonymity to the respondents and by carefully phrasing survey and interview questions in a normatively neutral manner. Yet, this type of bias cannot be ruled out completely. Especially given the strong normative connotations of the concept of accountability (Bovens, 2010), respondents and interviewees may have presented themselves and their agencies as more accountable than they really are. Furthermore, as with all survey research, the data collected through the survey is perception data. These limitations of the survey data can be overcome with unobtrusive data, but given that voluntary accountability is often done informally and not much institutionalized, this is quite challenging. Social media data was nevertheless found to be suitable for constructing an unobtrusive measure of voluntary accountability. Yet, the measure of voluntary accountability derived from the social media data also has its own limitations. It only provides a “minimal accountability threshold” and cannot issue a verdict as to the quality of the accountability interactions taking place on social media once this minimal threshold is met. It should be noted though that these methodological complexities are hardly surprising or new, as so far little consensus has emerged about a set of unbiased and unambiguous indicators for accountability (Brandsma, 2014).

Second, this dissertation has exclusively focused on voluntary accountability as *organisational* behaviour and *organisational* explanations of the phenomenon, treating EU agencies essentially as a black box. This is common in accountability studies. However, a growing literature has questioned this practice, arguing that an individual’s experienced relationship to accountability holders is key in understanding how formal accountability mechanisms work in the public sector (Overman & Schillemans, 2022; Overman, Schillemans, et al., 2020; Schillemans et al., 2020). More generally, this literature emphasizes that sociopsychological factors at the level of the individual are an important cog in the system linking formal institutions to actual accountability behaviour and outcomes in the public sector. This literature potentially holds important lessons for the study of voluntary accountability (Overman & Schillemans, 2022, p. 14). While such dynamics are highly relevant, they are beyond the scope of this dissertation. A proper assessment of such dynamics would speak to a somewhat different puzzle and require a different type of research design than the one adopted in this dissertation.

Third and finally, generalizations should be made cautiously. While studying EU agencies is scientifically and societally relevant (see introduction), this empirical focus may have come with the downside of possibly limited, or at least higher levels of uncertainty regarding, generalizability. Scholars have pointed at several characteristics of the EU that could be seen as rendering EU agencies distinctive, including the multiplicity of principals in the EU (Dehousse, 2008), higher than normal levels of contestation about who should be accountable to whom (Olsen, 2013), the weak democratic basis of multilevel governance (Papadopoulos, 2010) and the EU's legitimacy problems (Majone, 1999). It is an open question whether results similar to the ones reported in this dissertation can be obtained in polities without these characteristics. To this end, it is worth mentioning that scholars have recently started to investigate how administrative systems differ in terms of how accountability is enacted (Schillemans et al., 2022) and this type of research can help us further understand how the accountability of EU agencies compares with agency accountability in different administrative systems.

6.4 IMPLICATIONS FOR FUTURE RESEARCH

The findings from this dissertation give impetus to new research. First, this dissertation revealed that forums are an important part of the puzzle of voluntary accountability. For one, forum engagement is critical, among others, to whether account-seeking practices actually materialize into accountability. Yet, little is known about how forums exactly respond to account-seeking relationships and what leads them to become activated or not as 'accountability forums'. An important question for future work therefore is to investigate what leads forums to engage with attempts of voluntary account-seeking and what types of practices are most likely to generate meaningful engagement from forums. Based on existing literature, the expectation formulated in chapter two (see Table 2.3) was that some types of forums will be more eager account-holders than others because of their incentives to engage with the account-giver. Testing this expectation was beyond the scope of this dissertation. Future research is needed to validate this part of the conceptual model.

Second, this dissertation has looked at the *drivers* of voluntary accountability. Often, these drivers are related to implicit assumptions about the *effects* of voluntary accountability. For example, as shown in chapter three, EU agencies' top-level managers believe that positive effects, such as gains in terms of legitimacy, reputation, resources, performance and effectiveness, are to be expected from voluntary account-giving. Similarly, normative arguments found in the literature often rely on either rosy or rather gloomy ideas about the dominant *effects* of voluntary accountability. However, which effects materialize in practice has not been studied properly in a public sector context (but see, Becker, 2018, for an example from the non-profit sector). An experimental approach would be well-suited for ascertaining the effects of voluntary accountability. This dissertation provides useful input for such a scientific endeavour. For instance, the typology presented in chapter two could be used as a basis for constructing different treatment conditions in order to test through a vignette study how the audience to whom account is rendered affects assumed outcomes of voluntary accountability, such as trust, reputation and legitimacy. Furthermore, the level of forum

engagement (i.e., high versus low) could be varied to test whether this aspect has an impact on the (perceived) effect of voluntary account-giving. Such research could also determine if or when accountability initiatives lead to negative effects, such as biases in decision-making.

Third, theoretical models, concepts and methodological approaches from social psychology have recently been introduced to research on accountability in the public sector (Aleksavska, 2021; Aleksavska & Schillemans, 2022; Aleksavska et al., 2019; Aleksavska et al., 2022; Han & Perry, 2020; Overman & Schillemans, 2022; Schillemans, 2016). It has been argued that behavioural approaches to accountability are consistent with, or perhaps even similar to, reputational approaches to accountability. As noted by Aleksavska et al. (2022, p. 135), both approaches ‘postulate largely identical behavioral assumptions, despite differing in their level of analysis.’ There are indeed many similarities. Yet, both approaches alike have not fully engaged with and incorporated the theoretical assumptions underpinning the ‘individual roots of organisational reputation’ (Carpenter, 2010b, p. 47). Drawing on social identification theory, Carpenter (2010b) argues that the underlying principle driving organisations’ deep concern with (threats to) their reputation is individuals’ basic human need for self-esteem and a positive self-concept. Importantly, esteem, self-concept and identity are not merely determined at the individual level as social identity is in part shaped by the groups to which one belongs and the wider social evaluations of these groups. Embracing this foundational aspect of bureaucratic reputational theory more fully could complement and refine the behavioural approaches that have been developed to study accountability in the public sector at the micro-level. For example, social identity theory has identified group commitment as a crucial moderating factor that determines the responses to threats in the social environment and the strategies used to deal with these threats (Ellemers et al., 2002). The degree of commitment to the organisation among employees could help to explain how much effort is spent on accountability, for instance whether employees are willing to put in extra work to proactively explain and justify organisational conduct. Accordingly, employees with a low degree of commitment to the organisation may prefer to “go through the motions” (Busuic & Lodge, 2017) and resist accountability initiatives as they may care more about minimizing the workload than about the status and prestige that may come from increased accountability. Although not focussed on accountability explicitly, the study by Rho et al. (2015) hints at this dynamic as it shows that identification with one’s organisation positively affects extra-role behaviour. Assessing such dynamics, as a constituting factor of the reputational drivers found in this dissertation, is an important avenue for future research.

Fourth and finally, important questions remain with regards to how accountability plays out in the age of social media and how accountability is affected by agencies’ rapidly changing media environment. As demonstrated in chapter five, machine learning techniques are powerful tools that could be harnessed to assess the accountability effects of new information and communication technologies. Future studies could delve deeper and examine the content of online account-giving, how agencies respond to accountability claims on the internet and to what extent online voluntary account-giving is largely an exercise in disseminating positive information. Furthermore, important unanswered questions pertain to the interaction between

online practices of account-giving and offline accountability. Is there a “shadow of hierarchy” empowering the effect of online accountability? Does information released online by agencies travel to other forums? Does the growth of online accountability practices change how formal account-holders, such as watchdog institutions and parliament, hold agencies to account?

6.5 IMPLICATIONS FOR PRACTICE AND SOCIETY

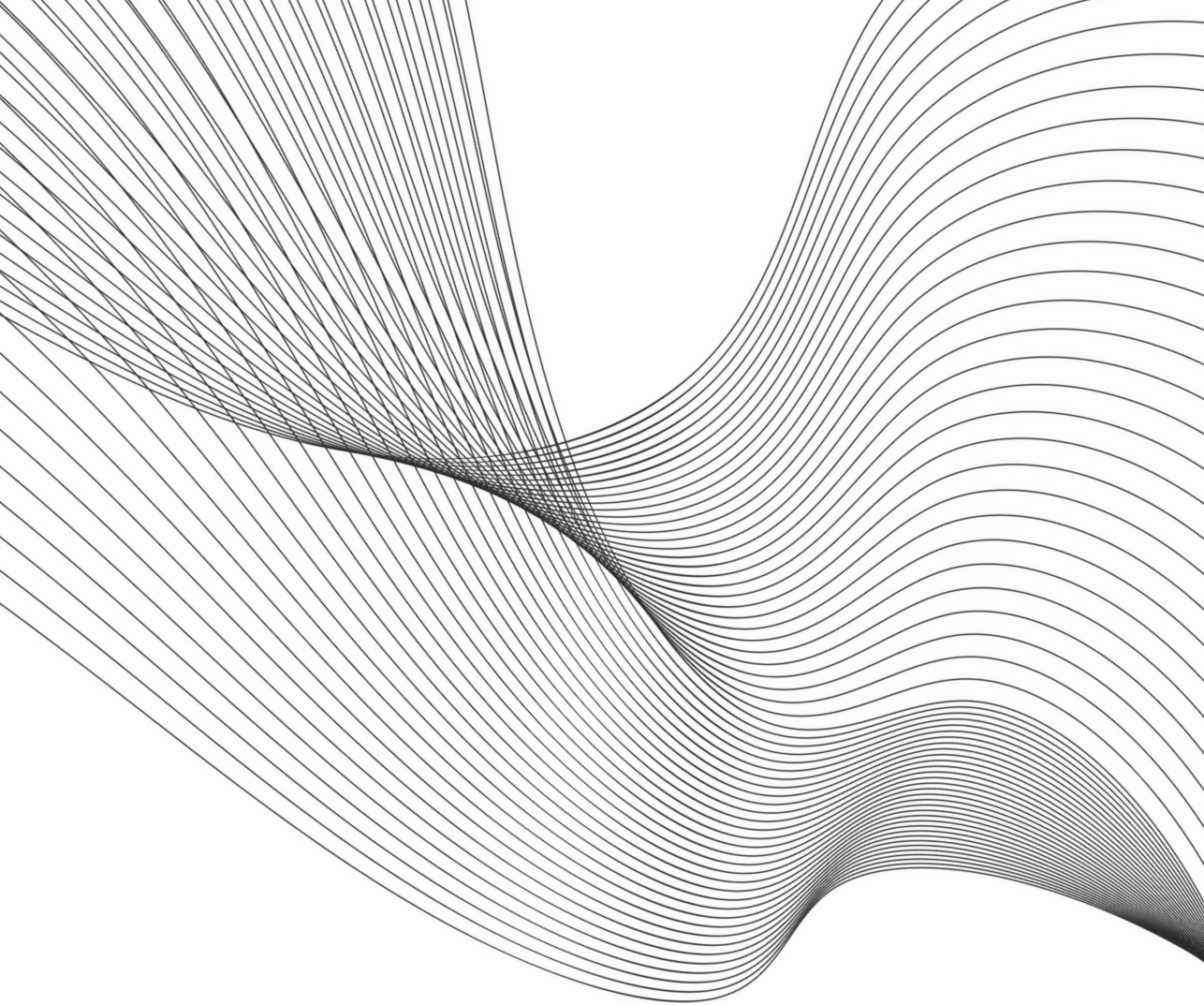
The dissertation provides some reasons to be optimistic about the potential of voluntary accountability to remedy accountability deficits, as well as some reasons for scepticism. The reasons for optimism will be discussed first. To start, while the interviews revealed that EU agency top-level managers tend to view formal accountability obligations as needlessly strict and demanding (Leidorf-Tidå & de Boer, 2022), they do not seem to have any problems with rendering voluntary accounts. The results indicate that EU agency top-level managers at least partly support voluntary account-giving because it is relatively costless, yet can help to attain desirable goals, such as more efficiency in administrative processes, higher user satisfaction and greater awareness among citizens of the functioning of the EU, which are desirable end pursuits. In other words, even when not resulting in substantial net accountability increases, such efforts can nevertheless still come with potential benefits for the public good. For example, even though the results show that social media is used strategically in ways that limit the accountability effects of this practice, it could be argued that the fact that EU agencies expose themselves to public discourse on social media is a better situation from an accountability standpoint than when EU agencies would not be on social media at all. In this sense, voluntary accountability has the potential to allow agencies to achieve positive proximate goals that suit and respond to agency needs – and to do so in a tailored fashion as such efforts are self-imposed. By contrast, this is difficult to achieve with mandatory procedures that tend to apply uniformly across the board and allow less scope for institutional needs and heterogeneities.

At the same time, there is reason to be sceptical. To begin with, voluntary accountability could very well be an unreliable instrument for safeguarding accountability, precisely because of its voluntary nature. There are no guarantees that accountability is enacted when it matters most. As shown in chapter three, EU agencies have by and large adopted practices that can be regarded as a “light” version of voluntary accountability. For instance, the most mentioned accountability initiatives were informal meetings/contacts, public events/conferences and social media. Such practices entail a strong component of information provision, but do not necessarily contribute directly to debate or the formation of judgements. While “light” practices may take a life on their own and can potentially be used to hold agencies to account, it is unrealistic to expect that the adoption of such practices will fundamentally remedy accountability problems in the public sector.

What is more, as indicated in chapter two, voluntary accountability means the cultivation of a relationship with a particular audience and this can introduce biases – to the benefit of the most vocal stakeholders or audiences, with actual net losses in legitimacy. For example, voluntary accountability practices geared towards the general public may induce unwanted

responsiveness to the most extreme segments in society that often come on top in today's (social) media environment and get the most attention on algorithm-driven social media feeds (Feeney & Porumbescu, 2020), such as when social media is used as a platform to put pressure on public agencies to adopt policies that go against the liberal-democratic values of Western democracies (Ojala et al., 2019). Also, accountability to a narrow group of societal stakeholders through voluntary accountability practices such as consultative forums could pose the risk of capture (Busuioc & Jevnaker, 2022) and empowering some stakeholders may come at the expense of the legitimate interests of others.

Important to note in this regard is that making blanket normative claims about the appropriateness and desirability of voluntary accountability in the public sector should be avoided. There is no one-size-fits-all yardstick or basic set of normative assessment criteria to judge all accountability initiatives against. Whether voluntary accountability is appropriate or desirable depends on many factors that have been highlighted in this dissertation, such as how the account is rendered, to whom, as well as actual forum engagement with, and responsiveness to, these one-sided accountability-seeking efforts. Importantly, this dissertation highlights that a crucial factor determining the implications of an accountability initiative – and whether it comes to be meaningful – is the role played by the forum. The best advice to anyone seeking to understand voluntary accountability, its drivers, as well as its effects is therefore to *look to the forum!*





CHAPTER 7

| References

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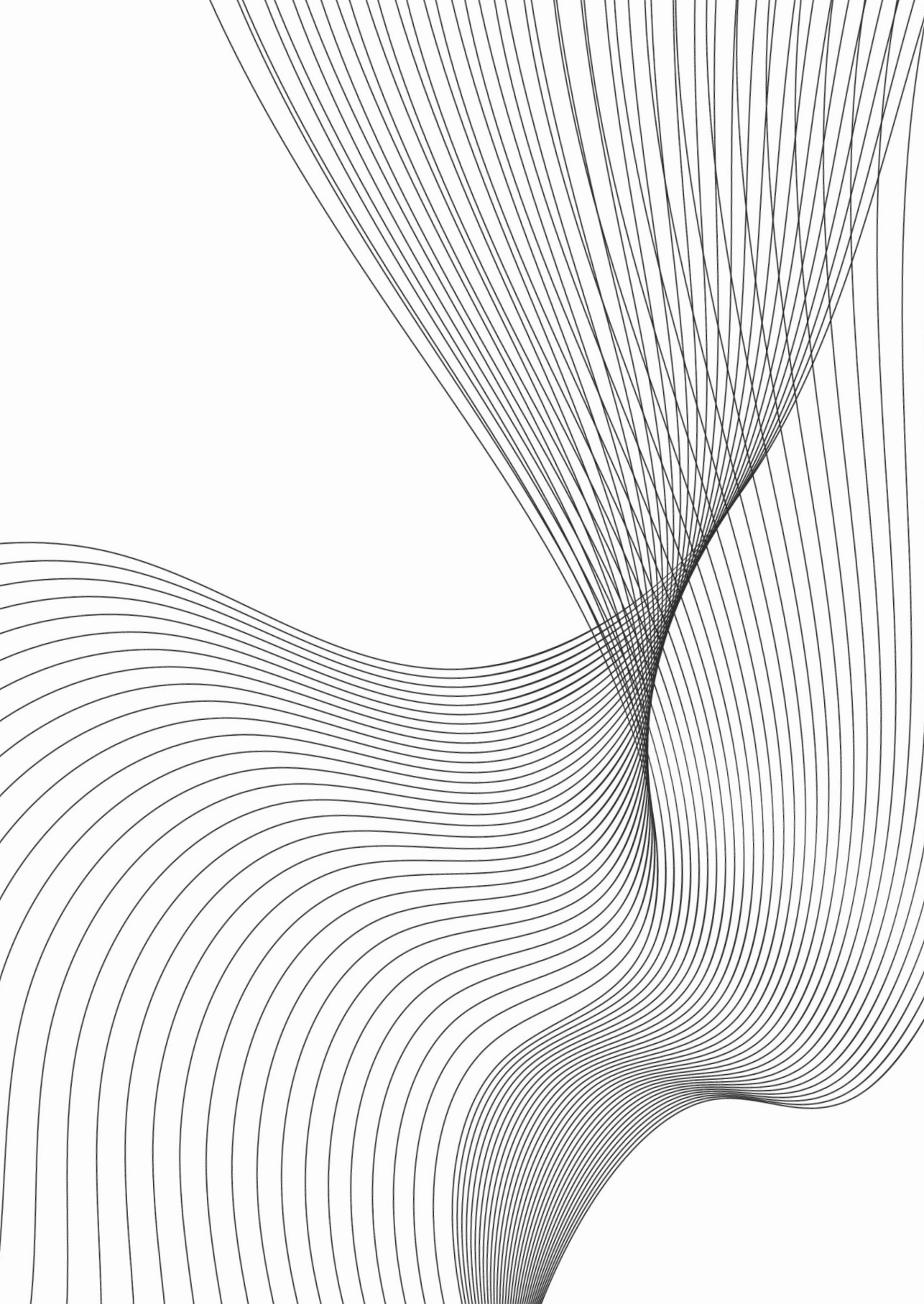
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CHAPTER 8

| Appendices

8.1 GENERAL

1.A AUTHOR STATEMENTS

■ Table 1.A.1: Author statements

Chapter	Co-author(s)	Statement
4 A Test of Reputation-Informed Mechanisms behind Accountability-Seeking Behaviour Vis-à-vis Six Different Audiences	Benjamin Leidorf-Tidå	The survey has been designed and distributed collaboratively by De Boer and Leidorf-Tidå. De Boer has written most of the text, collected the data for most unobtrusive measures, conducted the statistical analyses and developed the research design independently. Leidorf-Tidå has collected data for the measures of media salience and interest from the EP. He has also written parts of the text and given detailed feedback on the manuscript at different stages of the writing process.
5 The Use of Social Media as an Accountability Instrument: A Promise Fulfilled?	Madalina Busuioc and Aaron Swaving	De Boer came up with the research idea and is responsible for designing the study, conducting the regression analyses and co-authoring the text. Busuioc played a role in refining the proposed measure, co-wrote part of the introduction, theory, discussion and conclusion sections, in addition to general supervision and support. Swaving collected the social media data and conducted the machine learning sentiment analysis in Python.

8.2 APPENDIX TO CHAPTER 4

4.A FORMAL INDEPENDENCE

■ **Table 4.A.1: Codebook**

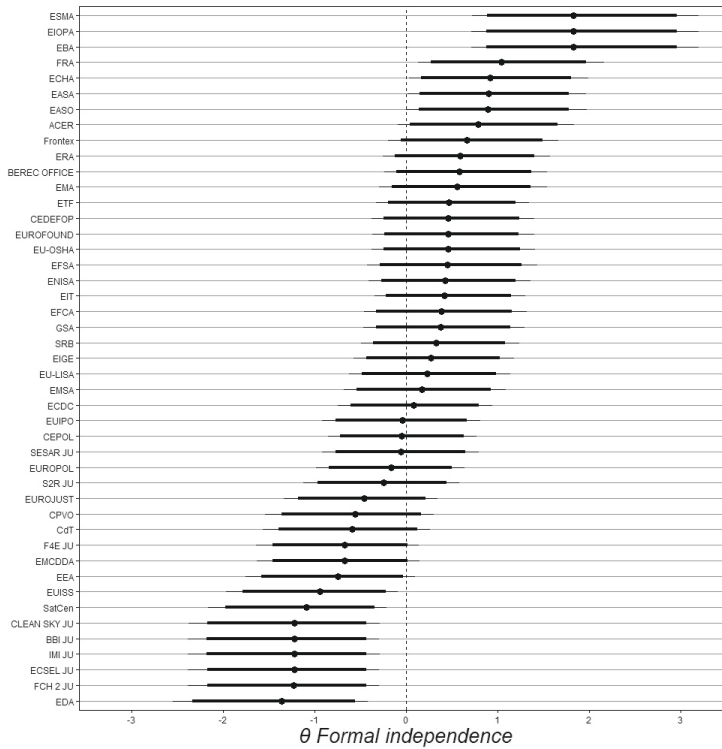
Variable	Wonka and Rittberger (2010)	Revised values
Term of AH	1,00 = 6 years or more 0.80 = 5 < 6 years 0.60 = 4 < 5 years 0.40 = 3 < 4 years 0.20 = 2 < 3 years 0,00 = 0 < 2 years	0 = 3 years or less 1 = 4 years 2 = 5 years or more
Selectorate / appointees of AH	1,00 = members of MB select and appoint agency head 0,67 = members of MB select AH; governments and/or Commission and/or EP appoints AH 0,33 = governments and/or Commission and/or EP selects candidates; MB appoints agency head 0,00 = governments and/or Commission and/or EP select and appoint agency head	0 = governments and/or EC and/or EP select and appoint AH 1 = governments and/or EC and/or EP selects candidates; MB or another internal body appoints AH 2 = MB or another internal body selects AH; MB and/or internal body and/or governments and/or EC and/or EP appoints AH
Quorum appointment AH	1,00 = simple majority 0,5 = qualified majority or 2/3 majority 0,00 = unanimity	0 = unanimity or 3/4 or 4/5 majority 1 = qualified majority or 2/3 majority 2 = simple majority
Rules for AH dismissal	1,00 = dismissal impossible 0,67 = dismissal possible for reasons not related to policy 0,33 = dismissal possible; no specific reasons explicated 0,00 = dismissal at appointers' discretion	0 = no rules 1 = present
Reappointment of AH	1,00 = no 0.50 = yes, once 0.00 = yes, more than once	0 = yes, more than once 1 = once or not at all
(Formal) AH independence	1,00 = yes, formal requirement 0.00 = no formal requirement	0 = no formal requirement 1 = yes, formal requirement
Formal requirement for AH qualification	1,00 = yes 0.00 = no	0 = no 1 = yes
Fixed term of office MB	N/A	0 = no/discretionary 1 = yes
(Formal) MB independence	1,00 = yes, formal requirement 0.50 = yes, but not all 0.00 = no formal requirement	0 = no formal requirement 1 = yes, for some or all members

■ Table 4.A.1: Continued

Variable	Wonka and Rittberger (2010)	Revised values
Formal requirement MB qualification	1,00 = yes 0.50 = yes, but not all 0.00 = no	0 = no 1 = yes, but not all 2 = yes
Formal independence of agency	1,00 = agency's independence formally stated 0.00 = no, agency's independence <u>not</u> formally stated	0 = no, agency's independence <u>not</u> formally stated 1 = agency's independence formally stated
Agency's formal reporting obligations – annual reports (retrospective)	1,00 = no formal reporting obligations 0.50 = presentation of annual report – for information 0.00 = presentation of annual report – for approval	0 = presentation of (draft) annual report – for approval 1 = presentation of (draft) annual report – <u>no</u> approval required
Agency's formal reporting obligations – annual working programme (prospective)	1,00 = no formal reporting obligations 0.50 = presentation of annual working programme – for information 0.00 = presentation of annual working programme – for approval	0 = presentation of (draft) annual working programme – for approval 1 = presentation of (draft) annual working programme – <u>no</u> approval required
Agency appeals board	1,00 = agency does have an appeals board 0.00 = agency does <u>not</u> have an appeals board	0 = agency does <u>not</u> have an appeals board 1 = agency does have an appeals board

Note: MB = Management Board; AH = Agency Head; EC = European Commission; EP = European Parliament.

■ **Figure 4.A.1: Highest posterior density**



This caterpillar plot (Figure 4.A.1) summarizes the results from the Bayesian factor analysis. The points represent the median for each agency. The thick lines depict the 90% credible intervals and thin lines depict the 95% credible intervals. Analogous to confidence intervals in the frequentist approach, credible intervals provide a measure of uncertainty. However, their interpretation is slightly different as they represent the relative number of draws that lie within a specific range. To illustrate this, we can say that 95% of the draws of the value for *formal independence* in the case of EDA lie between - 2.55 and -0.42.

The factor analysis was conducted with the *MCMCordfactanal* function from the *MCMCpack* package in R (Martin et al., 2011). The chain was run for 1000000 iterations, after an initial burn-in of 10000 iterations. Every 5th iteration was saved. The tuning parameter was set to 4. The element of λ_2 for the variable indicating whether the term of office of the management board is fixed ("mb. fixed") was constrained to be positive to help identify the model. The precision (also known as the inverse variance) was set to 1, which is a relatively non-informative prior. We set additional priors for λ_2 based on the parameters reported by Hanretty and Koop (2012). We acknowledge that the context of the EU is different in some respects from the context of the national level, yet we believe that the benefits of using informed priors outweigh the risks (e.g., misspecification). Multiple

convergence diagnostics and stationary tests were consulted to assess potential problems. No serious issues were detected.

The posterior values for formal independence are displayed in Table 4.A.2, along with the scores from Wonka and Rittberger (2010). Please note that the scores are measured on different scales. The scale used by Wonka and Rittberger can theoretically vary between 0 (no independence) and 1 (full independence), although no agency has a minimum or maximum score. Replication files and further information are archived on DANS easy and available via <https://doi.org/10.17026/dans-x8u-m3dd>.

■ **Table 4.A.2: Independence index**

EU agency	Independence score based on Bayesian factor analysis	Independence score from Wonka and Rittberger (2010)
ESMA	1.862	-
EIOPA	1.861	-
EBA	1.860	-
FRA	1.070	0.49
ECHA	0.941	0.62
EASA	0.924	0.59
EASO (now European Union Agency for Asylum (EUAA))	0.917	-
ACER	0.811	-
FRONTEX	0.684	0.45
ERA	0.610	0.51
BEREC OFFICE	0.601	-
EMA	0.572	0.33
ETF	0.478	0.63
EUROFOUND	0.475	0.54
EU-OSHA	0.475	0.21
CEDEFOP	0.474	0.45
EFSA	0.464	0.62
ENISA	0.439	0.4
EIT	0.436	-
EFCA	0.396	0.31
GSA (now European Union Agency for the Space Programme (EUSPA))	0.384	0.56
SRB	0.338	-
EIGE	0.281	-
EU-LISA	0.239	-

■ Table 4.A.2: Continued

EU agency	Independence score based on Bayesian factor analysis	Independence score from Wonka and Rittberger (2010)
EMSA	0.182	0.59
ECDC	0.087	0.6
EUIPO	-0.047	0.54
CEPOL	-0.049	0.29
SESAR JU	-0.058	-
EUROPOL	-0.168	0.26
S2R JU (now Europe's Rail Joint Undertaking (EU-Rail JU))	-0.253	-
EUROJUST	-0.471	0.31
CPVO	-0.574	0.5
CdT	-0.606	0.46
EMCDDA	-0.690	0.23
F4E JU	-0.691	0.49
EEA	-0.771	0.21
EUISS	-0.968	0.45
SatCen	-1.120	0.34
CLEAN SKY JU (now Clean Aviation Joint Undertaking)	-1.253	-
ECSEL JU (now Key Digital Technologies Joint Undertaking (KDJ JU))	-1.255	-
BBJ JU (now by Circular Bio-based Europe Joint Undertaking (CBE JU))	-1.255	-
IMI JU (now Innovative Health Initiative Joint Undertaking (IHI JU))	-1.256	-
FCH 2 JU (now Clean Hydrogen Joint Undertaking)	-1.257	-
EDA	-1.392	0.26

4.B ROBUSTNESS CHECK FOR HETEROSKEDASTICITY

■ Table 4.B.1: Regression models with heteroskedasticity-consistent (type 3) standard errors

<i>Predictors</i>	European Parliament		Council of the EU		Media		General public		Interest groups		Major corporations	
	<i>Estimates</i>	<i>p</i>	<i>Estimates</i>	<i>p</i>	<i>Estimates</i>	<i>p</i>	<i>Estimates</i>	<i>p</i>	<i>Estimates</i>	<i>p</i>	<i>Estimates</i>	<i>p</i>
Intercept	4.60 (0.64)	<0.001	5.59 (1.38)	<0.001	3.67 (0.92)	0.001	4.35 (1.14)	0.001	3.33 (1.38)	0.024	1.99 (1.60)	0.224
Media salience (log)	0.15 (0.09)	0.111	0.31 (0.16)	0.061	0.17 (0.07)	0.030	0.18 (0.13)	0.186	-0.11 (0.08)	0.201	-0.16 (0.14)	0.250
EP interest	-0.19 (0.04)	<0.001	-0.25 (0.12)	0.054	-0.12 (0.06)	0.053	-0.11 (0.08)	0.176	-0.01 (0.12)	0.926	0.04 (0.11)	0.739
Formal independence	0.32 (0.20)	0.137	0.52 (0.46)	0.272	0.02 (0.19)	0.922	0.08 (0.26)	0.745	0.10 (0.21)	0.615	-0.01 (0.21)	0.967
Number of staff (log)	-0.02 (0.16)	0.880	-0.38 (0.36)	0.298	-0.10 (0.18)	0.576	-0.25 (0.26)	0.339	-0.20 (0.28)	0.481	-0.02 (0.30)	0.942
Reference: Other type of agency												
Regulatory agency	-0.19 (0.28)	0.495	-0.70 (0.87)	0.428	0.33 (0.25)	0.206	0.25 (0.47)	0.606	2.18 (0.56)	0.001	2.22 (0.36)	<0.001
Informational agency	0.15 (0.25)	0.555	0.04 (0.74)	0.954	0.87 (0.30)	0.008	0.29 (0.49)	0.559	1.52 (0.50)	0.006	0.54 (0.43)	0.227
Observations	30		30		30		30		30		30	
R ² / R ² adjusted	0.457 / 0.315		0.307 / 0.127		0.456 / 0.314		0.244 / 0.047		0.615 / 0.515		0.595 / 0.490	

Note: Table entries are unstandardized OLS regression coefficients and robust standard errors in parenthesis.

4.C STEPWISE REGRESSION

■ **Table 4.C.1: Voluntary accountability towards the European Parliament (audience 1)**

<i>Predictors</i>	Model 1.0			Model 1.1			Model 1.2			Model 1.3			Model 1.4		
	<i>Estimates</i>	<i>p</i>		<i>Estimates</i>	<i>p</i>		<i>Estimates</i>	<i>p</i>		<i>Estimates</i>	<i>p</i>		<i>Estimates</i>	<i>p</i>	
Intercept	3.82 (0.19)	<0.001		4.55 (0.31)	<0.001		4.01 (0.12)	<0.001		4.50 (0.26)	<0.001		4.60 (0.69)	<0.001	
Media salience (log)	0.08 (0.05)	0.115								0.13 (0.04)	0.005		0.15 (0.06)	0.017	
EP interest				-0.08 (0.05)	0.114					-0.17 (0.05)	0.002		-0.19 (0.05)	0.002	
Formal independence							0.18 (0.17)	0.289		0.24 (0.14)	0.104		0.32 (0.15)	0.052	
Number of staff (log)													-0.02 (0.14)	0.863	
Reference: Other type of agency															
Regulatory agency													-0.19 (0.27)	0.487	
Informational agency													0.15 (0.26)	0.561	
Observations	30			30			30			30			30		
R ² / R ² adjusted	0.086 / 0.054			0.087 / 0.054			0.040 / 0.006			0.390 / 0.319			0.457 / 0.315		

Note: Table entries are unstandardized OLS regression coefficients and standard errors in parenthesis.

■ Table 4.C.2: Voluntary accountability towards the Council of the EU (audience 2)

<i>Predictors</i>	Model 2.0		Model 2.1		Model 2.2		Model 2.3		Model 2.4	
	<i>Estimates</i>	<i>p</i>	<i>Estimates</i>	<i>p</i>	<i>Estimates</i>	<i>p</i>	<i>Estimates</i>	<i>p</i>	<i>Estimates</i>	<i>p</i>
Intercept	2.92 (0.41)	<0.001	3.88 (0.66)	<0.001	3.17 (0.26)	<0.001	3.81 (0.65)	<0.001	5.59 (1.64)	0.002
Media salience (log)	0.10 (0.10)	0.312					0.18 (0.11)	0.111	0.31 (0.14)	0.034
EP interest			-0.11 (0.11)	0.341			-0.23 (0.12)	0.077	-0.25 (0.12)	0.059
Formal independence					0.25 (0.35)	0.488	0.33 (0.35)	0.363	0.52 (0.36)	0.166
Number of staff (log)									-0.38 (0.33)	0.256
<i>Reference: Other type of agency</i>										
Regulatory agency									-0.70 (0.64)	0.283
<i>Informational agency</i>										
									0.04 (0.60)	0.943
Observations	30		30		30		30		30	
R ² / R ² adjusted	0.036 / 0.002		0.032 / -0.002		0.017 / -0.018		0.156 / 0.059		0.307 / 0.127	

Note: Table entries are unstandardized OLS regression coefficients and standard errors in parenthesis.

■ Table 4.C.3: Voluntary accountability towards the media (audience 3)

<i>Predictors</i>	Model 3.0		Model 3.1		Model 3.2		Model 3.3		Model 3.4	
	<i>Estimates</i>	<i>p</i>	<i>Estimates</i>	<i>p</i>	<i>Estimates</i>	<i>p</i>	<i>Estimates</i>	<i>p</i>	<i>Estimates</i>	<i>p</i>
Intercept	3.11 (0.23)	<0.001	3.50 (0.41)	<0.001	3.54 (0.16)	<0.001	3.42 (0.39)	<0.001	3.67 (0.89)	<0.001
Media salience (log)	0.13 (0.06)	0.033					0.16 (0.07)	0.022	0.17 (0.07)	0.031
EP interest			0.01 (0.07)	0.916			-0.07 (0.07)	0.346	-0.12 (0.07)	0.083
Formal independence					0.00 (0.22)	0.995	-0.04 (0.21)	0.853	0.02 (0.20)	0.924
Number of staff (log)									-0.10 (0.18)	0.572
<i>Reference: Other type of agency</i>										
Regulatory agency									0.33 (0.34)	0.351
Informational agency									0.87 (0.33)	0.013
Observations	30		30		30		30		30	
R ² / R ² adjusted	0.152 / 0.122		0.000 / -0.035		0.000 / -0.036		0.186 / 0.092		0.456 / 0.314	

Note: Table entries are unstandardized OLS regression coefficients and standard errors in parenthesis.

■ Table 4.C.4: Voluntary accountability towards the general public (audience 4)

Predictors	Model 4.0		Model 4.1		Model 4.2		Model 4.3		Model 4.4	
	Estimates	p	Estimates	p	Estimates	p	Estimates	p	Estimates	p
Intercept	2.94 (0.23)	<0.001	3.35 (0.39)	<0.001	3.20 (0.15)	<0.001	3.29 (0.38)	<0.001	4.35 (1.00)	<0.001
Media salience (log)	0.09 (0.06)	0.125					0.12 (0.06)	0.069	0.18 (0.08)	0.046
EP interest			-0.02 (0.07)	0.771			-0.09 (0.07)	0.228	-0.11 (0.07)	0.150
Formal independence					0.10 (0.21)	0.643	0.10 (0.21)	0.650	0.08 (0.22)	0.705
Number of staff (log)									-0.25 (0.20)	0.216
Reference: Other type of agency										
Regulatory agency									0.25 (0.39)	0.528
Informational agency										
									0.29 (0.37)	0.432
Observations	30		30		30		30		30	
R ² / R ² adjusted	0.082 / 0.049		0.003 / -0.033		0.008 / -0.028		0.134 / 0.034		0.244 / 0.047	

Note: Table entries are unstandardized OLS regression coefficients and standard errors in parenthesis.

■ Table 4.C.5: Voluntary accountability towards interest groups (audience 5)

Predictors	Model 5.0		Model 5.1		Model 5.2		Model 5.3		Model 5.4	
	Estimates	p	Estimates	p	Estimates	p	Estimates	p	Estimates	p
Intercept	3.32 (0.35)	<0.001	2.89 (0.57)	<0.001	3.10 (0.22)	<0.001	2.96 (0.58)	<0.001	3.33 (1.05)	0.004
Media salience (log)	-0.01 (0.09)	0.869					-0.06 (0.10)	0.523	-0.11 (0.09)	0.245
EP interest			0.07 (0.10)	0.483			0.07 (0.11)	0.558	-0.01 (0.08)	0.891
Formal independence					0.43 (0.29)	0.160	0.41 (0.32)	0.205	0.10 (0.23)	0.656
Number of staff (log)									-0.20 (0.21)	0.345
Reference: Other type of agency										
Regulatory agency									2.18 (0.41)	<0.001
Informational agency									1.52 (0.38)	0.001
Observations	30		30		30		30		30	
R ² / R ² adjusted	0.001 / -0.035		0.018 / -0.017		0.069 / 0.036		0.088 / -0.017		0.615 / 0.515	

Note: Table entries are unstandardized OLS regression coefficients and standard errors in parenthesis.

■ Table 4.C.6: Voluntary accountability towards major corporations (audience 6)

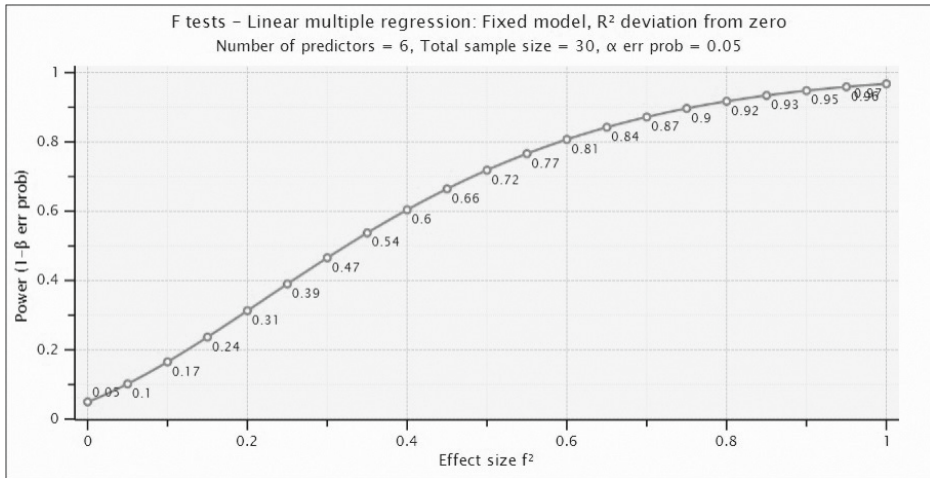
Predictors	Model 6.0		Model 6.1		Model 6.2		Model 6.3		Model 6.4	
	Estimates	p	Estimates	p	Estimates	p	Estimates	p	Estimates	p
Intercept	2.57 (0.39)	<0.001	2.17 (0.63)	0.002	2.31 (0.24)	<0.001	2.24 (0.64)	0.002	1.99 (1.19)	0.106
Media salience (log)	-0.02 (0.10)	0.835					-0.07 (0.11)	0.542	-0.16 (0.10)	0.124
EP interest			0.06 (0.11)	0.582			0.05 (0.12)	0.665	0.04 (0.09)	0.685
Formal independence					0.47 (0.33)	0.160	0.47 (0.35)	0.193	-0.01 (0.26)	0.974
Number of staff (log)									-0.02 (0.24)	0.926
Reference: Other type of agency										
Regulatory agency									2.22 (0.46)	<0.001
Informational agency										
									0.54 (0.44)	0.228
Observations	30		30		30		30		30	
R ² / R ² adjusted	0.002 / -0.034		0.011 / -0.024		0.069 / 0.036		0.084 / -0.022		0.595 / 0.490	

Note: Table entries are unstandardized OLS regression coefficients and standard errors in parenthesis.

4.D SENSITIVITY

The graph below (Figure 4.D.1) shows the power for different effect sizes in a multiple regression with six predictors and a sample size of 30. The graphs were created using Gpower (Faul et al., 2009).

■ **Figure 4.D.1: Power as a function of the effect size in OLS regression with six predictors and N = 30**



The graph applies to the regression models shown in chapter four (Table 4.2), as there are six predictors in these models and the sample size is 30. The plot shows that, given an alpha of 0.05 (two-tailed), weak effects ($f^2 = 0.02$) are nearly undetectable. To be precise, power is 0.07 for weak effects. Power is 0.24 for medium effects ($f^2 = 0.15$) and 0.53 for large effects ($f^2 = 0.35$). As mentioned in chapter four, power passes the 0.8 threshold when the effect size is 0.59.

4.E REGRESSION ANALYSIS WITH FULL DATASET

■ **Table 4.E.1: Regression models based on full sample with traditional standard errors**

Predictors	Audience 1: European Parliament		Audience 2: Council of the EU		Audience 3: Media		Audience 4: General public		Audience 5: Interest groups		Audience 6: Major corporations	
	Estimates	p	Estimates	p	Estimates	p	Estimates	p	Estimates	p	Estimates	p
Intercept	5.75 (0.62)	<0.001	4.86 (1.17)	<0.001	4.65 (0.73)	<0.001	3.89 (0.82)	<0.001	5.01 (0.89)	<0.001	4.24 (1.03)	<0.001
Media salience (log)	0.21 (0.07)	0.003	0.22 (0.13)	0.087	0.20 (0.08)	0.015	0.14 (0.09)	0.129	-0.06 (0.10)	0.553	-0.08 (0.11)	0.496
EP interest	-0.12 (0.05)	0.021	-0.13 (0.10)	0.192	-0.03 (0.06)	0.578	0.01 (0.07)	0.924	0.07 (0.07)	0.365	0.13 (0.08)	0.120
Formal independence	0.22 (0.16)	0.162	0.26 (0.30)	0.389	-0.10 (0.18)	0.603	-0.05 (0.21)	0.819	-0.07 (0.22)	0.769	-0.27 (0.26)	0.316
Number of staff (log)	-0.32 (0.13)	0.022	-0.28 (0.25)	0.284	-0.33 (0.16)	0.044	-0.21 (0.18)	0.234	-0.51 (0.19)	0.013	-0.44 (0.22)	0.058
Reference: Other type of agency												
Regulatory agency	-0.23 (0.31)	0.458	-0.73 (0.59)	0.224	0.06 (0.36)	0.863	0.03 (0.41)	0.941	1.67 (0.44)	0.001	1.55 (0.52)	0.005
Informational agency	-0.10 (0.26)	0.715	-0.07 (0.49)	0.890	0.42 (0.30)	0.176	0.03 (0.34)	0.931	0.76 (0.37)	0.051	-0.47 (0.43)	0.288
Observations	37		37		37		37		37		37	
R ² / R ² adjusted	0.371 / 0.245		0.185 / 0.022		0.303 / 0.164		0.100 / -0.080		0.435 / 0.322		0.464 / 0.357	

Note: Table entries are unstandardized OLS regression coefficients and standard errors in parenthesis.

■ **Table 4.E.2: Regression models based on full sample with heteroskedasticity-consistent (type 3) standard errors**

<i>Predictors</i>	Audience 1: European Parliament		Audience 2: Council of the EU		Audience 3: Media		Audience 4: General public		Audience 5: Interest groups		Audience 6: Major corporations	
	<i>Estimates</i>	<i>p</i>	<i>Estimates</i>	<i>p</i>	<i>Estimates</i>	<i>p</i>	<i>Estimates</i>	<i>p</i>	<i>Estimates</i>	<i>p</i>	<i>Estimates</i>	<i>p</i>
Intercept	5.75 (0.68)	<0.001	4.86 (1.15)	<0.001	4.65 (0.77)	<0.001	3.89 (1.01)	0.001	5.01 (1.13)	<0.001	4.24 (1.35)	0.004
Media salience (log)	0.21 (0.09)	0.025	0.22 (0.14)	0.128	0.20 (0.07)	0.005	0.14 (0.11)	0.209	-0.06 (0.09)	0.537	-0.08 (0.12)	0.534
EP interest	-0.12 (0.06)	0.045	-0.13 (0.12)	0.310	-0.03 (0.10)	0.744	0.01 (0.11)	0.953	0.07 (0.12)	0.592	0.13 (0.10)	0.202
Formal independence	0.22 (0.22)	0.315	0.26 (0.42)	0.540	-0.10 (0.21)	0.652	-0.05 (0.30)	0.876	-0.07 (0.30)	0.825	-0.27 (0.25)	0.288
Number of staff (log)	-0.32 (0.20)	0.109	-0.28 (0.32)	0.393	-0.33 (0.19)	0.087	-0.21 (0.26)	0.414	-0.51 (0.26)	0.064	-0.44 (0.26)	0.103
<i>Reference: Other type of agency</i>												
Regulatory agency	-0.23 (0.36)	0.517	-0.73 (0.72)	0.322	0.06 (0.32)	0.845	0.03 (0.44)	0.945	1.67 (0.68)	0.020	1.55 (0.59)	0.013
Informational agency	-0.10 (0.24)	0.689	-0.07 (0.56)	0.904	0.42 (0.32)	0.194	0.03 (0.45)	0.947	0.76 (0.47)	0.117	-0.47 (0.51)	0.368
Observations	37		37		37		37		37		37	
R ² / R ² adjusted	0.371 / 0.245		0.185 / 0.022		0.303 / 0.164		0.100 / -0.080		0.435 / 0.322		0.464 / 0.357	

Note: Table entries are unstandardized OLS regression coefficients and robust standard errors in parenthesis.

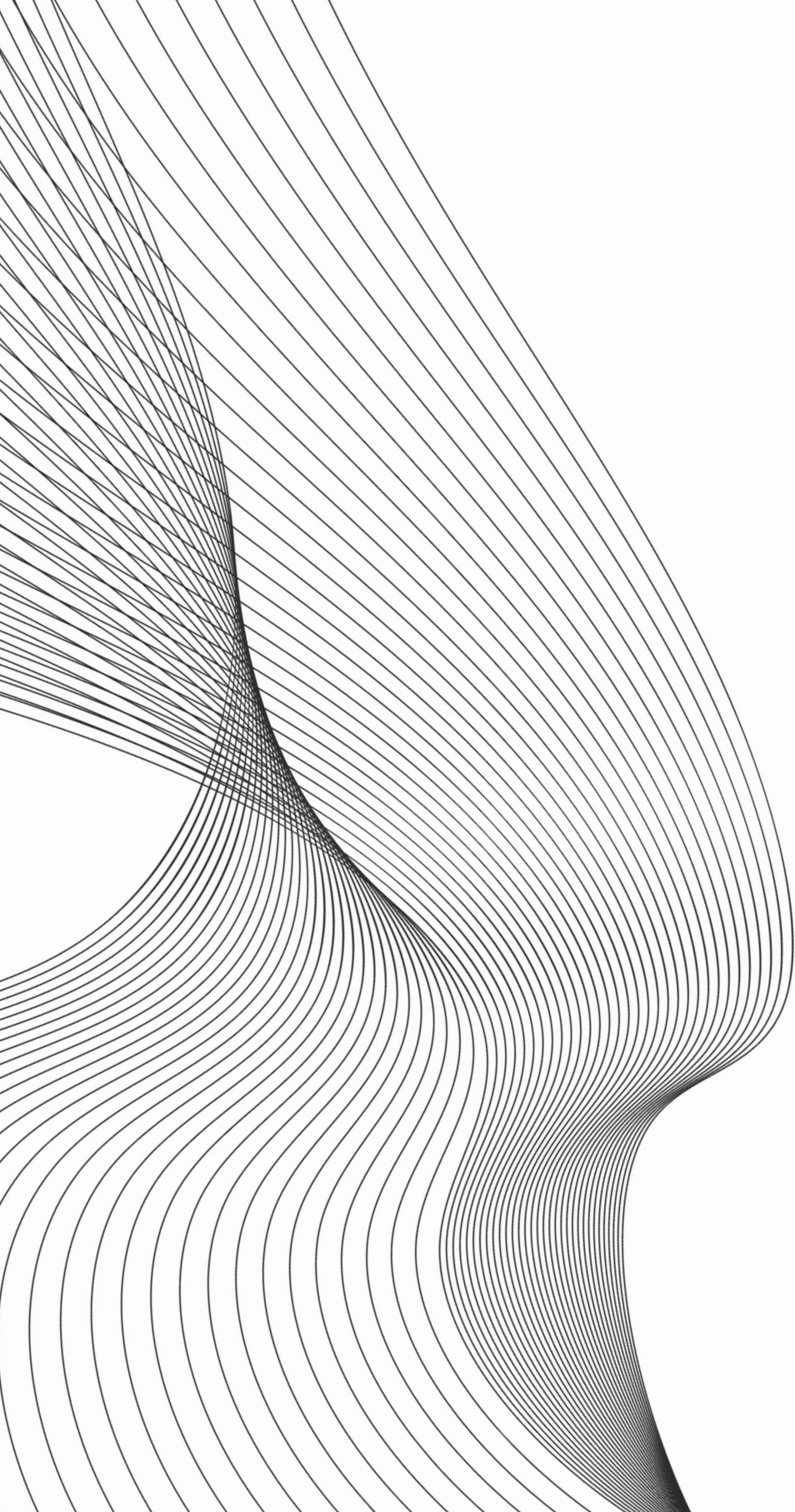
8.3 APPENDIX TO CHAPTER 5

5.A NEGATIVE BINOMIAL MODELS

■ **Table 5.A.1 Negative Binomial Generalized Linear Mixed Models (GLMM) with AR1 covariance structure**

	Information		Discussion
	Model 3.0	Model 3.1	Model 4.0
(Intercept)	2.963 [2.516; 3.410]	2.956 [2.502; 3.410]	1.329 [0.644; 2.013]
Expected consequences (CWC)	0.319 [-0.004; 0.642]		
Expected consequences (CGM)		0.233 [-0.069; 0.536]	
Information (CWC)			0.019 [0.014; 0.025]
Political salience (log)	0.121 [-0.023; 0.265]	0.137 [-0.011; 0.286]	0.410 [0.199; 0.621]
Regulatory task (ref.: no regulatory task)	-0.370 [-0.998; 0.258]	-0.350 [-0.989; 0.290]	-0.153 [-1.055; 0.750]
Formal independence	0.197 [-0.130; 0.524]	0.216 [-0.118; 0.550]	-0.137 [-0.607; 0.332]
Budget (log)	0.041 [-0.088; 0.170]	0.042 [-0.089; 0.173]	0.183 [-0.002; 0.369]
Formal independence x Budget (log)			0.286 [0.036; 0.536]
Month fixed effects	Yes	Yes	Yes
AIC	4117.692	4119.355	2639.818
Log Likelihood	-2037.846	-2038.677	-1297.909
Num. obs.	519	519	519
Num. groups: acronym	44	44	44

Note: Table entries are regression coefficients, with 95% confidence intervals in square brackets. Estimation was done with Restricted Maximum Likelihood (REML). Bold values are significant at the 0.05 level. All models are Negative Binomial (II) models. CGM = centring at the grand mean; CWC = centring within clusters.





CHAPTER 9

| Dutch Summary

9.1 PROBLEEMSTELLING

In toenemende mate committeren overheidsinstanties zich vrijwillig aan het afleggen van publieke verantwoording. Dit gebeurt zowel op lokaal, regionaal, nationaal en supranationaal niveau en door middel van verschillende praktijken. Vrijwillige verantwoording vormt een aanvulling op bij wet verplichte verantwoordingsmechanismen. De toegenomen bereidheid van overheidsinstanties om vrijwillig verantwoording af te leggen is een significante ontwikkeling voor de bestuurskunde, aangezien verantwoording een kernwaarde is in het openbaar bestuur. Verantwoording is van groot belang voor de legitimering van overheidshandelen, het voorkomen van machtsmisbruik en het verbeteren van de prestaties van publieke organisaties (Bovens et al., 2008). Gezien het belang ervan, dient verantwoording voldoende gewaarborgd te worden. Dit is alleen maar belangrijker geworden door de introductie van nieuwe vormen van bestuur die vaak op gespannen voet staan met traditionele noties van verantwoording waarbij wordt uitgegaan van een hiërarchisch georganiseerd openbaar bestuur (Considine, 2002; Dubnick & Frederickson, 2010; Michels & Meijer, 2008).

Vrijwillige verantwoording biedt een baken van hoop te midden van toenemende bezorgdheid over ontoereikende waarborgen ten aanzien van verantwoording als gevolg van de veranderende inrichting van het openbaar bestuur. Vrijwillige verantwoording wordt gezien als een remedie die de ontstane verantwoordingslacunes in de publieke sector kan verkleinen en misschien zelfs geheel kan verhelpen (Brummel, 2021; Koop, 2014; Schillemans, 2011; Scott, 2006). Ondanks deze positieve connotaties en hoge verwachtingen is er geen consensus over een sluitende theoretische verklaring voor dit fenomeen. Tot dusver zijn verschillende verklarende mechanismen voorgesteld als de belangrijkste drijvende kracht achter vrijwillige verantwoording. Bij gebrek aan vergelijkende, verklarende studies is echter niet duidelijk welke daarvan de overhand heeft. Het is dus onduidelijk waarom overheidsinstanties vrijwillig kostbare verantwoordingsactiviteiten ondernemen. Om dergelijk organisatiegedrag beter te begrijpen, is dit proefschrift gericht op de drijfveren achter vrijwillige verantwoording. Door de drijfveren achter vrijwillige verantwoording te bestuderen, wordt blootgelegd wat overheidsinstanties motiveert tot organisatorisch gedrag dat zou kunnen bijdragen aan het waarborgen van verantwoording in het openbaar bestuur.

Dit proefschrift heeft tot doel te begrijpen waarom overheidsinstanties vrijwillig verantwoording afleggen. Daarbij wordt gebruikgemaakt van een reputatie-perspectief op verantwoording dat is geïntroduceerd door Busuioac and Lodge (2016, 2017). Zij stellen dat verantwoordingsprocessen moeten worden beschouwd als gebeurtenissen waarin reputaties worden gevormd. Organisaties streven in hun verantwoording naar het in stand houden van de eigen reputatie tegenover verschillende publieken. Verantwoording afleggen biedt overheidsinstanties de mogelijkheid om successen onder de aandacht te brengen, reputatierisico's te beheersen en verwachtingen te achterhalen. Zeker omdat vrijwillige verantwoording in wezen op de eigen voorwaarden plaatsvindt, is het een manier om de reputatievoordelen van verantwoording maximaal te benutten. Zo gezien is vrijwillige verantwoording logisch organisatiegedrag. In dit proefschrift wordt daarom expliciet nagegaan in hoeverre overwegingen met betrekking tot de reputatie een drijfveer vormen voor het vrijwillig afleggen van verantwoording. Niettemin staat dit proefschrift

ook open voor alternatieve verklaringen. De volgende onderzoeksvraag vormt de leidraad voor het onderzoek van dit proefschrift: *Wat drijft de neiging van overheidsinstanties om uitgebreidere verantwoordingspraktijken toe te passen en/of om verregaandere verantwoordingsmechanismen in gang te zetten dan die wettelijk verplicht zijn? Met andere woorden, wat zijn de drijfveren achter vrijwillige verantwoording?*

Voor de beantwoording van deze hoofdvraag is gekozen om onderzoek te verrichten naar agentschappen van de Europese Unie (hierna: “EU-agentschappen”). De reden voor deze casusselectie is dat verschillende studies reeds hebben aangetoond dat EU-agentschappen zeer bereid zijn gebleken om vrijwillig verantwoording af te leggen en verschillende vrijwillige verantwoordingspraktijken hebben omarmd (Arras & Braun, 2018; Busuioc, 2013; Busuioc & Jevnaker, 2022; Piquet, 2021; Wood, 2018). Door te richten op EU-agentschappen, maakt dit proefschrift gebruik van, en bouwt het voort op, het waardevolle bestaande onderzoek dat is gedaan naar verantwoordingzoekend gedrag van EU-agentschappen. Dit proefschrift zet evenwel een volgende stap door te proberen de variatie daarin te verklaren en de drijfveren erachter bloot te leggen.

9.2 KERNBEVINDINGEN PER DEELSTUDIE

De hoofdonderzoeksvraag is opgesplitst in vier deelvragen, die elk in een deelstudie zijn onderzocht. De eerste deelvraag is: *Hoe kan vrijwillige verantwoording conceptueel begrepen en geanalyseerd worden?* Het beantwoorden van deze beschrijvende deelvraag is van het groot belang gezien de conceptuele ambiguïteit die aan het concept “vrijwillige verantwoording” kleeft. Dit proefschrift stelt dat veelgebruikte conceptuele en analytische raamwerken weliswaar zeer nuttige instrumenten zijn gebleken voor het bestuderen van de meeste vormen van verantwoording, maar dat ze slechts beperkt inzetbaar zijn voor het analyseren van vrijwillige verantwoording. De reden hiervoor is dat gevestigde raamwerken veelal de nadruk leggen op het bestaan van een “verplichting”, hetgeen per definitie afwezig is wanneer verantwoording vrijwillig is. Een nieuwe definitie van vrijwillige verantwoording dient dit te verhelpen: *Een relatie tussen een actor en een betrokken forum, waarin de actor zich vrijwillig committeert aan het verstrekken van informatie over, en het geven van uitleg van, zijn gedrag en met consequenties geconfronteerd kan worden.* Deze definitie benadrukt de relationele aard van verantwoording. Het is daarbij van belang om in ogenschouw te nemen dat het bestaan van een sociale relatie tussen een actor (de partij die verantwoording aflegt) en een forum (de partij aan wie verantwoording wordt afgelegd) niet vanzelfsprekend is. In tegenstelling tot verplichte verantwoording, waarbij de verantwoordingsrelatie expliciet is gedefinieerd en vastgelegd in formele documenten door een externe partij, ontstaat vrijwillige verantwoording enkel en alleen wanneer zowel de actor en het forum hun relatie “aanvaarden”.

De tweede deelstudie biedt de eerste empirische inzichten en is gericht op de volgende deelvraag: *Welke drijvende mechanismen zetten aan tot organisatorisch verantwoordingzoekend gedrag naar welk type forum?* Deze deelvraag is verklarend van aard en wordt beantwoord door middel van een kwalitatieve analyse van interviews met hooggeplaatste managers van verschillende EU-

agentschappen en antwoorden op open enquêtevragen. In deze deelstudie staat de mogelijke link tussen drijfveren en forums centraal. De leidende propositie, voortvloeiend uit de relationele benadering van vrijwillige verantwoording die is ontwikkeld in de eerste deelstudie, is dat de drijvende mechanismen achter vrijwillige verantwoording samenhangen met het type forum – dat wil zeggen aan wie verantwoording wordt afgelegd. De bevindingen van de tweede deelstudie ondersteunen deze propositie grotendeels, zij het dat sommige precieze verbanden tussen drijfveren en forums iets anders zijn dan verwacht. De kwalitatieve gegevens bevestigen het belang van drie eerder gedocumenteerde motivaties als drijvende kracht achter vrijwillige verantwoording: democratische motivatie, leermotivatie en reputatiemotivatie. Daarnaast is er één motivatie geïdentificeerd die kan worden gezien als een context-specifieke variant van de eerder gedocumenteerde politiek-strategische motivatie, namelijk financiële motivatie. De laatste, vijfde motivatie kan worden beschreven als “effectiviteitsmotivatie”. Dit verwijst naar de ervaren noodzaak verantwoording te moeten afleggen om succesvol de gestelde taken van de organisatie te kunnen uitvoeren binnen een sterk gefragmenteerde institutionele context. Uit de analyse blijkt dat de overwegingen omtrent reputatie en effectiviteit bijzonder belangrijke drijfveren zijn achter het vrijwillig afleggen van verantwoording, aangezien deze drijfveren van belang zijn ongeacht aan welk type forum verantwoording wordt afgelegd.

De derde deelstudie gaat expliciet in op reputatieoverwegingen als drijvende kracht achter vrijwillige verantwoording. Op basis van de groeiende literatuur over bureaucratische reputatie en de opgedane inzichten uit de interviews zijn hypothesen geformuleerd op basis waarvan het verklarende vermogen van het reputatie-perspectief kan worden getoetst. De deelvraag behorende bij deze deelstudie is: *In hoeverre verklaren reputationele mechanismen variatie in verantwoordingzoekend gedrag?* Deze deelvraag is beantwoord op basis van een kwantitatieve onderzoeksopzet, waarbij onder andere gebruik is gemaakt van originele enquêtegegevens. De resultaten bevestigen de relevantie van reputatieoverwegingen als drijvende kracht achter vrijwillige verantwoording. Het is echter wel zo dat – in overeenstemming met de bevindingen uit de andere deelstudies – de drijfveren aanzienlijk verschillen afhankelijk van het forum waaraan verantwoording wordt afgelegd. Reputationele mechanismen lijken het meest relevant voor het verklaren van vrijwillige verantwoording richting het Europees Parlement, de Raad van de Europese Unie en de media. In overeenstemming met de bevindingen uit de kwalitatieve analyse lijken leermotivaties een grote rol te spelen bij het vrijwillig afleggen van verantwoording naar maatschappelijke belanghebbenden, zoals pressiegroepen en grote bedrijven.

De vierde deelstudie toetst ook de drijfveren achter vrijwillige verantwoording, maar dit keer ligt de nadruk op een specifieke praktijk van vrijwillige verantwoording: sociale media. In deze deelstudie wordt de volgende deelvraag behandeld: *Wat verklaart variatie in de communicatie van agentschappen op sociale media en in hoeverre dient het gebruik van sociale media om verantwoording te bevorderen?* Sociale media zijn bij uitstek een voorbeeld van een vrijwillige verantwoordingspraktijk waaromtrent hoge verwachtingen zijn gewekt. Het gebruik ervan in de publieke sector zou de positie van burgers tegenover het openbaar bestuur versterken en zo de publieke sector democratiseren. Voor de analyse is een rijke dataset gebruikt die is

geconstrueerd op basis van data afkomstig van het socialemediaplatform Twitter. Met betrekking tot de vraag of sociale media kunnen worden beschouwd als een verantwoordingsinstrument, luidt het antwoord, op basis van de criteria uit het conceptuele kader (zie de eerste deelstudie), dat zij de potentie hebben om als verantwoordingsmechanisme te dienen. Gebleken is dat in maanden waarin een EU-agentschap meer informatie verstrekt op Twitter (gemeten als het aantal geplaatste tweets), er meer discussie is over een EU-agentschap op Twitter (gemeten als het aantal reacties op tweets van het EU-agentschap). Hieruit kan worden opgemaakt dat het verstrekken van informatie tot gevolg heeft dat Twitter-gebruikers hun mening geven. Er is dus sprake van een sociale relatie. Belangrijk is dat uit de resultaten ook blijkt dat de mate waarin EU-agentschappen informatie verstrekken op Twitter afhankelijk is van de verwachting van positieve gevolgen. EU-agentschappen verstrekken meer informatie als en wanneer zij verwachten dat dit positieve gevolgen zal hebben voor hun reputatie.

9.3 ALGEMENE CONCLUSIE

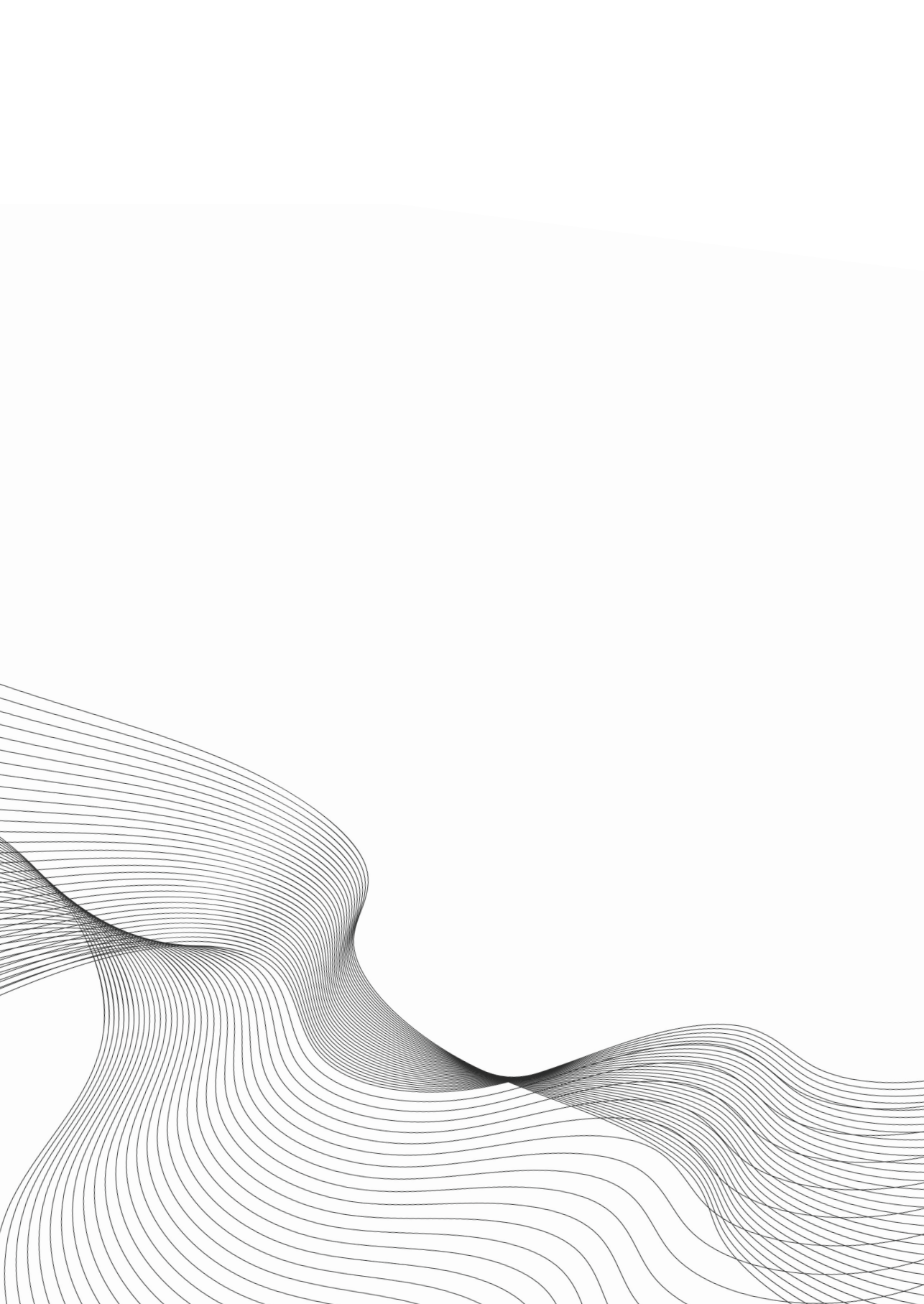
Al met al stelt dit proefschrift dat forums een sleutelrol spelen in het begrijpen van vrijwillige verantwoording. Aangezien vrijwillige verantwoording door de actor zelf wordt opgelegd, denkt men misschien niet meteen aan het forum als de belangrijkste factor om vrijwillige verantwoording te begrijpen. Toch is de belangrijkste les van dit proefschrift dat het forum een cruciale rol speelt. Met een knipoog naar Carpenter (2010a) kan de belangrijkste conclusie van dit proefschrift als volgt worden samengevat: Kijk naar het forum om vrijwillige verantwoording te begrijpen!

Dit proefschrift laat zien dat de identiteit van het forum een van de belangrijkste verklaringen is waarom een specifiek drijvend mechanisme geactiveerd wordt. Meer bepaald blijkt uit de analyse van zowel de interview- als de enquêtegegevens dat de dominantie van een specifiek mechanisme afhankelijk is van het soort forum en de middelen die het forum aan de actor kan verstrekken. Dit verband tussen drijfveren en forum-typen is een van de belangrijkste bevindingen van dit proefschrift. Het onderstreept dat de uitkomsten van verantwoordingsprocessen gezamenlijk worden geproduceerd in de interactie tussen de actor en het forum (Busuioc & Lodge, 2017). Dit geldt voor alle vormen van verantwoording, ongeacht of deze vrijwillig of verplicht is.

Bovendien toont dit proefschrift aan dat er geen “heilige graal” bestaat van één dominante set van drijvende motivaties achter vrijwillige verantwoording. In plaats daarvan moet vrijwillige verantwoording worden gezien als gedreven door een mix van complementaire mechanismen. Het onderscheid tussen de logica van gepastheid en de logica van gevolgen is een centraal punt geweest in het wetenschappelijke debat over de drijfveren achter vrijwillige verantwoording. Hoewel deze actiologica's nuttig zijn op een abstract niveau, is hun onderscheidbaarheid in de praktijk veel minder duidelijk en een strikt onderscheid sluit niet goed aan bij de manier waarop publieke managers praten over het streven naar verantwoording. Empirisch gezien is het bijna onmogelijk om deze actiologica's duidelijk te scheiden. Terwijl sommige motivaties wijzen op strategische afwegingen van kosten en baten, wijzen andere motivaties meer op normvolgend

gedrag. Meer algemeen zijn beide actiologica's in de praktijk veelal vaag, overlappend en met elkaar verstrengeld, waardoor het vrij moeilijk is ze van elkaar te onderscheiden.

Ten slotte, wat de betreft ambitie van dit proefschrift om expliciet te bevestigen of te verwerpen dat reputatieoverwegingen een drijvende kracht zijn achter het vrijwillig afleggen van verantwoording, neigen de bevindingen sterk in de richting van bevestiging. Hoewel vrijwillige verantwoording wordt gedreven door een mix van complementaire mechanismen zonder dat één actiologica duidelijk domineert, laten alle empirische hoofdstukken op de een of andere manier zien dat reputatieoverwegingen een rol spelen. Uit de tweede deelstudie bleek dat de topmanagers van de EU-agentschappen het vaakst redenen omtrent reputatie noemden wanneer hen gevraagd werd naar de belangrijkste motivatie om vrijwillig verantwoording af te leggen. Bovendien noemden zij reputatieoverwegingen met betrekking tot alle soorten forums. De derde deelstudie bevestigde het belang van reputatie als drijvende kracht achter vrijwillige verantwoording aan de hand van statistische methoden. Voorts is het waarschijnlijk dat vrijwillige verantwoording alleen ontstaat wanneer de actor verwacht dat reputatieschade kan worden voorkomen. Zoals blijkt uit de vierde deelstudie streven actoren naar een sterke aanwezigheid op sociale media voor zover zij verwachten dat het publiek op sociale media positief op deze communicatie zal reageren. Al met al leveren deze resultaten sterk bewijs dat reputatie een belangrijke, zij het niet exclusieve, drijfveer is achter vrijwillige verantwoording. Belangrijk is dat dit niet wil zeggen dat het vrijwillig afleggen van verantwoording moet worden beschouwd als voortvloeiend uit één actiologica. Actoren kunnen verantwoording strategisch gebruiken om reputatiedoelen na te streven (Maor, 2020), maar ze kunnen ook verwachtingen met betrekking tot verantwoording internaliseren en in lijn met deze verwachtingen handelen omdat ze geloven dat dit de maatschappelijk juiste manier is (Busuioc & Lodge, 2016; Maggetti & Papadopoulos, 2018).





CHAPTER 10

| About the Author

After completing pre-university education at Spinoza Lyceum Amsterdam in 2012, Thijs de Boer (2 October, 1993, Amsterdam) applied for, and was admitted to, the Bachelor program Public Administration and Organisational Science at the Utrecht School of Governance of Utrecht University. After obtaining his bachelor's degree in 2015, he did a fulltime board year. The next year, in 2016, Thijs enrolled in the Master program Research in Public Administration and Organisational Science, a two-year research programme offered jointly by Dutch universities. On the side, he also worked briefly at that time as a student assistant in the Calibrating Public Accountability (CPA) project at Utrecht University and, later, in the Reputation Matters in the Regulatory State (EURICA) project at Leiden University.

In 2018, Thijs joined the Institute of Public Administration at Leiden University as a doctoral researcher. This position was part of the European Research Council-funded EURICA project led by Madalina Busuioc. In January 2022, the EURICA project moved from Leiden University to Vrije Universiteit Amsterdam, where he finished his doctoral research. During his PhD trajectory, Thijs participated actively in academic life despite the pandemic. Among others, he attended methods schools in Bamberg and Essex, took several courses, co-organised a well-attended panel about accountability at the annual Netherlands Institute of Governance conference and acted several times as peer reviewer. He has presented his work at national and international conferences and published in international, peer-reviewed journals. Since February 2023, Thijs works part-time at the Netherlands Scientific Council for Government Policy (WRR). As of April 2023, he is also a postdoctoral researcher at the Institute of Security and Global Affairs, Leiden University, where he works on the NWO-funded project States in Shock: The Adaptive Capacities of State Administrations to Transboundary Crises.

