REVIEW ARTICLE

THE COMPARATIVE ANALYSIS OF BUREAUCRATIC ACCOUNTABILITY

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Joseph G. Jabbra and O.P. Dwivedi, eds., Public Service Accountability: A Comparative Perspective (West Hartford, Connecticut: Kumarian Press Inc., 1988), xiii+ 273pp.

Accountability: Its Continuing Importance

Bureaucratic accountability has been a major issue in many countries. This is evident by the adoption in many parts of the world of novel procedures and institutions to promote accountability in the face of increasing bureaucratic power and larger and more complex government. Recently, the Central and Eastern European countries and some developing countries have been undergoing fundamental political change towards more democracy. This process raises many issues concerning the design and implementation of systems to ensure political and administrative accountability.

 Public Service Accountability provides an assessment of accountability in fourteen countries covering North America, Europe, Asia, Latin America, Africa and the Middle East. An introduction is provided by the editors and by Gerald Caiden. The strength of this book lies in its individual chapters, rather than in integrating the diversity into a coherent "comparative perspective." However, anyone teaching comparative public administration should have this book on the required reading list, for it is a good source on accountability in developing countries.

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To bring some clarity to a comparative analysis, I shall examine bureaucratic accountability in terms of four elements: meanings and definitions; ideology; mechanisms and instruments; and the practice of accountability, especially in developing countries.

Definitions

The definitions of accountability vary considerably but all contain common themes. Jabbra and Dwivedi state that

> ... public service accountability involves the methods by which a public agency or a public official fulfills its duties and obligations, and the process by which that agency or the public official is required to account for such actions.[1]

They note that five elements are involved: *administrative* or *organizational accountability* (the hierarchy, rules and regulations, and so on), *legal accountability* (adherence to legal and judicial processes), *political accountability* (the political leaders' acceptance of the accountability of public servants), *professional accountability* (the performance of tasks and duties by high "professional" standards), and *moral accountability* (acting in the public interest in a responsible manner). If this definition is meant as a guideline for the authors of the country studies in the book, it falls far short of providing a framework. The contributors in *Public Service Accountability*, excepting the editors and Caiden, did not explore in any detail the various meanings and definitions of these concepts.

Other definitions of accountability abound in the public administration literature, including Chandler and Plano's dictionary definition which includes *fiscal, legal, programme, process,* and *outcome* accountability.[2]

A very useful definition by Thynne and Goldring clarifies the complex meanings of accountability around the broader concept of "responsibility" to involve several "senses", including: the *task* sense (Are public servants performing the jobs they are supposed to be doing?); the *appropriate* sense (Are they acting responsibly and in a responsive manner?); and an accountable *cause* sense (Are they subject to controls which hold them accountable for their performance of task and appropriateness?).[3]

The meanings and definitions of accountability in the Jabbra and Dwivedi volume and the others noted above take a narrow public administration perspective. A broader view of accountability and responsibility is to view the processes within a public policy framework as proposed by Cooper as involving a system of role relationships among the four variables of citizenry, politicians, public policy and administrators.[4] This provides a framework which could be useful in a comparative analysis because it places accountability in a context which can vary considerably across organizations and countries.

The Ideology

A constant theme in the public administration literature deals with the power that bureaucrats, bureaucracies and the state possess and use. The traditional politics-administration dichotomy can no longer be maintained or defended, as in practice the roles of the political sector and administrative sector have become blurred. Administrators have great power in most societies by way of their expertise, permanence, size of their organizations and their close proximity to political power. Administrators also implement policies and are often in a position whereby they can exercise considerable discretion in policy application.

The ideology of bureaucratic accountability contends that "accountability is the foundation of any governing process..."[5] Accountability and responsibility represent important features of *democratic* societies. Political leadership is held accountable to the citizens by regular, free and competitive elections. Ultimately, in the democratic polity, accountability of the administrators and the bureaucracy is to the citizens of the country - the citizen is sovereign. Accountability for the administrators and the bureaucracy is essential to ensure legitimacy of rule and to promote the concept of the public administrator as the servant of the people.[6] The citizen's role is clear. It is

> ... the absolute necessity and right of the individual to com-
> plain against insensitive or callous treatment by the bureauc-
> racy on the grounds that each individual has basic human
> rights regardless of the form of government that may exist.[7]

This perception of the ideology of accountability is rather politically culture-bound and based upon democratic principles of governance. Difficulties arise in attempting to define the ideology in polities without a strong democratic tradition of governance or the cultural foundations upon which it is based. Two examples from *Public Service Accountability* illustrate this point. Anna Maria Campos begins her chapter by pointing out that "the word 'accountability' does not exist in the Portuguese language, thus making the task of writing a chapter on public service accountability in Brazil a real challenge."[8] Peter Harris, analysing China's experience, argues that there is no tradition supporting the common conception of accountability in ideology or practice:

> In China no western bourgeois notion of accountability can be accepted ostensibly because "bourgeois" notions themselves are emphatically unacceptable. It appears unlikely that notions of western accountability will ever be entertained in the People's Republic of China.[9]

In non-democratic polities, accountability may not be to the citizens, but to a monarch or ruler, a political party, or to an ideology. The meanings and definitions may also be severely restricted to legal and fiscal accountability, for even the most vicious dictator expects this as a minimum. The ideological dimensions of accountability and responsibility need to be analyzed further in order to apply it beyond the democratic traditions of its origins.

Mechanisms

The early literature on accountability, as exemplified by the Finer-Friedrich debate, emphasized the efficacy of the most important approach for ensuring accountability.[10] The experience of countries over time has resulted in multiple measures being adopted leading to a "redundancy of control" rather than a single instrument.[11] This has resulted in a system of overlapping constraints and permissions, which, in combination, are designed to promote responsible bureaucrats and organizations. A framework for analyzing mechanisms and structures in a comparative way is lacking in *Public Service*

Accountability. Most authors of the country studies focus on one or more mechanisms without clarity in conceptualizing the types involved.

If one is seeking to evaluate the mechanisms from a comparative perspective, a categorization is necessary. A useful procedure for this (summarized in Table 1), which has been developed over time by Gilbert, Kernaghan, and Thynne and Goldring, outlines some of the various methods of control categorized along two dimensions.[12] Instruments to promote accountability can either be *internal* to the bureaucracy, of they may be *external* to the bureaucracy. Additionally, they may be considered as either *formal* or direct controls, or they may be *informal* or indirect influences.

Table 1
Bureaucratic Accountability Mechanisms

	INTERNAL	EXTERNAL
FORMAL	Hierarchy Rules and Regulations Budgets Personnel management Performance evaluation Auditing Programme monitoring Code of conduct	Legislative review Advisory committees Judicial action Ombudsman Review tribunals Evaluation research Freedom of information

INFORMAL	Personal ethics
	Professionalism
	Representative bureaucracy
	Commitment
	Anticipated reactions from
	  superiors
		Public comment
		Interest group pressure
		Peer review
		Media scrutiny
		Political parties
		Politicians and officials at
		  other levels of government

Sources: Adapted from C.E. Gilbert, "The Framework of Administrative Responsibility," *Journal of Politics* 21 (August 1959): 373-407; K. Kernaghan, "Responsible Public Bureaucracy: A Rationale and a Framework for Analysis," *Canadian Public Administration* 16 (4, 1973): 572-603; and I.S. Thynne and J. Goldring, *Accountability and Control: Government Officials and the Exercise of Power* (Sydney: Law Book Co., 1987).

Internal/Formal mechanisms are the bureaucratic hierarchy, rules and regulations, personnel management procedures, budgeting, and so on. All exist within the bureaucracy and require compliance. Internal/Informal mechanisms relate to personal ethics, professionalism, commitment and the promotion of a representative bureaucracy. External/Formal mechanisms are those controls related to parliament or an assembly, advisory committees, ombudsmen, review tribunals, and so on. The fourth and very important category of accountability mechanisms are External/Informal - public comment, interest group activity, citizen claims and participation, and the role of the media as a watchdog on the process of government. Together, these mechanisms provide a multiple-source and multi-directional accountability framework which promotes responsible behaviour.

Over many decades, the mechanisms have become institutionalized in democratic societies in an evolutionary process. For instance, the ombudsman idea has spread widely, but in many countries the duties and responsibilities vary considerably. The process of adopting mechanisms such as the ombudsman, freedom of information, and evaluation research within each country may be painfully slow.

Part of the problem of accountability in the developing countries, as pointed out by the authors in *Public Service Accountability*, is that in some countries the public administration systems and the accountability procedures are inherited from the colonial era and may exist in form only. Furthermore, many do not have an elaborate multi-dimensional framework for accountability in place - and those in power actively discourage the development of such a framework. Emphasis for maintaining accountability rests almost exclusively in the Internal/Formal category (emphasizing legal and fiscal accountability), and, to a much lesser extent, on mechanisms in the Internal/Informal category. Legislative bodies may not exist; if they do, their powers are curtailed and committees exercise little or no effective influence over the administrative sector. Judicial review and ombudsman are either not operating or subject to restrictions. The External/Informal category of accountability instruments in authoritarian systems may be suppressed, the citizens depoliticized and the media tightly controlled in regard to any

criticism of government, its leaders, public policies and administrators. Under these conditions, accountability may indeed be impossible unless the Internal/Formal mechanisms work very well.

The Practice of Accountability

The general conclusion of most of the chapters in Public Service Accountability is that bureaucratic accountability practices have been on the decline and what is needed, in Caiden's view, is a "restoration" of accountability in modern government. However, writing primarily about the democratic states, he asserts that "public bureaucracies generally perform well, but their performance leaves much to be desired."[13] The reasons for the decline in the practice of accountability, according to Caiden, are the growth of bureaucracies into huge, impersonal organizations; the increase in activities of the bureaucracy that makes it impossible for everything to be monitored; the emphasis on compliance and process accountability at the expense of managerial, programme and social accountability; and the decline in ethical standards of public servants and governments.

In general, both the editors and Caiden have difficulty applying accountability to developing countries and authoritarian polities. They also fail to address the problem of how accountability fits (or does not fit) authoritarian polities in sufficient detail. The concepts, theories, analyses and cases on this subject have been dominated by the experience of the "western" democracies and this literature seldom addresses the issues and problems of accountability outside the liberal democratic tradition of governance.[14] For that reason, the chapters by Campos on Brazil, Harris on China and Cattel on the Soviet Union are enlightening.

Most writers dealing with accountability in the Third World tend to emphasize the historical development of the mechanisms and practices from the colonial era through modern times. However, central to understanding accountability in the developing countries is the need to place the bureaucracy in its political context in many countries of periodic or long-term authoritarian rule. The style of authoritarianism varies from regimes which rule by some degree of popular consent to those which brutally crush any

opposition and rule by fear and terror. Regardless, the public bureaucracy plays the key role in the political life of the state. This is why some countries have been labelled as "bureaucratic polities", "administrative states," or "bureaucratic authoritarian" regimes, with some exercising "bureaucratic capitalism" and others "bureaucratic feudalism." The military is a major force in politics, and it is not uncommon to see the military actually running the country or controlling politics and administration by manipulating the government in power. Accountability can even be an excuse for a coup, "... practically all military coups in Nigeria have been justified by the need to redeem the poor accountability image of the preceding regime."[15]

"Maladministration" and corruption, by all accounts, are epidemic in all but a few of the developing countries, whether ruled in a democratic fashion (such as India) or ruthlessly authoritarian (as in Burma).[16] Secondly, bureaucrats and bureaucracies exercise considerable power in the society, polity, and economy. To whom and in what way are they and their organizations accountable?

In conditions of authoritarian rule, the ideology, mechanisms and practice of accountability and responsibility (beyond the fiscal and legal accountability found in any type of polity) may be unwanted intrusions into the exercise of political and administrative power. Citizens may have no right to criticize the government or its policies. As Hurwitz noted,

> This ability to complain (other than by violence) about
> alleged violations of a central personal liberty, for maladmin-
> istration by the state's agents, or for insensitivity by the
> bureaucratic structures, is a process that has not yet arrived in
> the majority of cultures and political systems ...[17]

The regimes in some states and their political leaders may lack legitimacy for their rule and for their public policies. If the political leaders themselves are not accountable to the public, what hope is there for admin-istrators to act in an accountable manner? Administrative accountability under such conditions is unlikely to exist or be promoted if it undermines authority and questions the actions of leadership.

All governments will have the mechanisms attempting to deal with fiscal and legal accountability. Beyond this narrow perspective, other forms

of accountability may depend in large part upon the nature of the political processes within each country. In democratic developing countries, many instruments for attempting to ensure accountability and responsibility are in place. In India, for instance, one finds most of the internal and external mechanisms noted in Table 1. Legislative review, advisory committees, the ombudsman, judicial independence, as well as intense scrutiny of government and its actions by the media, various interest groups and affected citizens, result in a complex framework which tries to make the bureaucrat and the bureaucracy more accountable. However, Jain and others argue that the system does not work very well.[18]

Another issue concerning accountability in the developing countries is the independent power of some governmental elements.[19] The military, some police and security units as well as powerful statutory bodies may be uncontrollable by political leaders. The military, in particular, may manipulate the political process, as in Thailand and Pakistan, even though they are formally accountable to their political leaders. This is an acute problem in democratizing states where the powerful elements in the previously authoritarian systems attempt to hold on to their power without constraints.

Public Service Accountability deals with only central administration. However, important progress has been made in many countries to decentralize administration and to build in community involvement and control in order to promote a "bottom-up" style of administration. As Korten noted, top-down development, is "... a situation in which interventions are imposed in the name of development, without consultation, on people who have no means of holding the imposing 'leaders' accountable for their actions."[20] By operating closer to the citizens, government and the administrators are more likely to be held accountable for their actions by the community.

Conclusion

Accountability and responsibility will continue to be refined and expanded in democratic societies and in states undergoing a long-term transformation to democratic rule in the Third World and in the Central and Eastern European nations. Whether these new forms of governing can succeed in

bringing powerful entities into an effective accountability framework will be an important question for public administration specialists. However, the prospects in many states of the developing countries for acceptance of the commonly accepted ideology of accountability and a multi-dimensional framework for accountability in which all four components of Table 1 are fully expanded *and actually work* seem very remote. Therefore, the analysis in *Public Service Accountability* and this review have not been optimistic about the future of accountability in developing countries.

To develop a comparative perspective on bureaucratic accountability, we must go beyond an understanding of the history, and an assessment, of the various mechanisms and how they work in practice. For purposes of comparative analysis, two approaches may be useful. At the organizational level, we need to know more about the socialization of public officials into responsible or irresponsible public servants within their bureaucratic environment. Additionally, precise evaluation procedures to assess accountability can be developed.[21] At the broader level, more attention needs to be directed to understanding accountability in non-democratic political cultures. A useful approach may be to develop an accountability context such as Cooper's role-relationship matrix.

In summary, the Jabbra and Dwivedi volume is a useful addition to the literature of public administration and provides the best comparative perspective to date; however, new approaches need to be applied in order to provide a perspective on accountability which goes beyond the democratic traditions of government.

NOTES

1.   Joseph G. Jabbra and O.P. Dwivedi, "Introduction" in Jabbra and Dwivedi, *Public Service Accountability: A Comparative Perspective* (West Hartford, Connecticut: Kumarian Press Inc., 1988), p.5.
2.   R.C. Chandler and J.C. Plano, *The Public Administration Dictionary*, 2nd ed. (Santa Barbara: ABC-CLIO Press, 1988), p.119.
3.   I.S. Thynne and J. Goldring, *Accountability and Control: Government Officials and the Exercise of Power* (Sydney: Law Book Co., 1987).
4.   T.L. Cooper, *The Responsible Administrator: An Approach to Ethics for the Administrative Role*, 2nd ed. (New York: Associated Faculty Press, 1986), p.xx.

5.   Jabbra and Dwivedi, *Public Service Accountability*, p.8.
6.   G.E. Caiden, "The Problem of Ensuring the Public Accountability of Public Officials" in Jabbra and Dwivedi, *Public Service Accountability*, pp.19-21.
7.   L. Hurwitz, *The State as Defendant: Governmental Accountability and the Redress of Individual Grievances* (Westport, Connecticut: Greenwood Press, 1981), p.xiii.
8.   A.M. Campos, "Public Service Accountability in Brazil: The Missing Concept" in Jabbra and Dwivedi, *Public Service Accountability*, pp.201-13.
9.   P. Harris, "China: The Question of Public Service Accountability" in Jabbra and Dwivedi, *Public Service Accountability*, pp.227-49.
10.   C.J. Friedrich, "Public Policy and the Nature of Administrative Responsibility" in C.J. Friedrich & E.S. Mason, eds., *Public Policy* (Boston: Harvard University Press, 1940), pp.3-24; and H. Finer, "Administrative Responsibility in Democratic Government," *Public Administration Review* 1 (4, 1941): 335-50.
11.   F.X. Kaufmann, G. Majone and V. Ostrom, eds., *Guidance, Control and Evaluation in the Public Sector* (Berlin: de Gruyter, 1986), p.13. Also see in the same volume, W. Wirth, "Control in Public Administration: Plurality, Selectivity and Redundancy," pp.595-624.
12.   C.E. Gilbert, "The Framework of Administrative Responsibility," *Journal of Politics* 21 (August 1959): 373-407; K. Kernaghan, "Responsible Public Bureaucracy: A Rationale and a Framework for Analysis," *Canadian Public Administration* 16 (4, 1973): 572-603; and I.S. Thynne, and J. Goldring, *Accountability and Control: Government Officials and the Exercise of Power* (Sydney: Law Book Co., 1987).
13.   Caiden, "The Problem of Ensuring the Public Accountability of Public Officials," p.23.
14.   The Jabbra and Dwivedi introductory chapters are no exception. Some analysis does exist. See, for instance, L.V. Carino, "Administrative Accountability: A Review of the Evolution, Meaning and Operationalization of a Key Concept in Public Administration," *Philippine Journal of Public Administration* 27(April 1983): 118-48; G.F. Lungu, "Administrative Responsibility in a Developing Country: Theoretical Considerations and the Case of Zambia," *Public Administration and Development* 3 (3, 1983): 361-71. J.I. Tapia-Videla, "Institutionalization of Bureaucratic Accountability in Latin America: A General Overview," Paper presented to the 51st Annual Meeting of the American Society for Public Administration, Los Angeles, April 7-11, 1990; T.B. Smith, "Bureaucratic Accountability and Policy Evaluation in Third World Countries," *International Journal of Public Administration* 13 (forthcoming, 1991). The *Indian Journal of Public Administration* 29 (July-September 1983) is a special issue on administrative accountability dealing primarily with the Indian sub-continent.
15.   D. Olowu & V. Ayeni, "Public Service Accountability in Nigeria" in Jabbra and Dwivedi, *Public Service Accountability*, p.143.
16.   The corruption literature is vast. For a review, see, G.E. Caiden, "Toward a General Theory of Official Corruption," *Asian Journal of Public Administration* 10 (June 1988): 3-26. Also see, A.J. Heidenheimer, *et al*, eds., *Political Corruption: New Perspectives in Comparative Analysis* (New Brunswick, New Jersey: Transaction Books, 1987). For an sound bibliography, see M.S. Haque and M. Darwin, "Bibliography on Corruption," *Asian Journal of Public Administration* 10 (June 1988): 126-48.
17.   Hurwitz, *The State as Defendant*, p.3.
18.   R.B. Jain, "Public Service Accountability in India," in Jabbra and Dwivedi, *Public Service Accountability*, pp.122-36. Also see *The Indian Journal of Public Administration* 29 (3, 1983).
19.   See Tapia-Videla, "Institutionalization of Bureaucratic Accountability in Latin America."

20.   D.C. Korten, "The Community: Master or Client? A Reply," *Public Administration and Development* 9 (5, 1989): 573. The importance of decentralization is noted in the Brazil Chapter by Campos. Also see, G.S. Cheema and D.A. Rondinelli, eds., *Decentralization and Development* (Beverly Hills: Sage, 1983); and D.C. Korten, ed., *Community Management: Asian Experience and Perspectives* (West Hartford: Kumarian, 1987).
21.   M.G. O'Loughlin, "What is Bureaucratic Accountability and How Can We Measure It?" *Administration and Society* 22 (November 1990): 275-302.