15 Conclusion: evaluation and accountability

SYNOPSIS

This book is about the description of the policy process and not a prescriptive text. In this concluding chapter two concepts are addressed that belong to a large extent to the prescriptive branches of policy analysis: evaluation and accountability. In examining how these issues are addressed in the modern world there is a need to take into account the complexity of the policy process explored throughout the book and highlighted at the end of the discussion of governance in the last chapter. If there is a 'democratic deficit' arising from the complexity of governance, can new forms of evaluation and new approaches to accountability reduce that deficit?

Evaluation appears as a final stage in stages models of the policy process. Yet, whilst for any policy process with a concrete output the other stages will have occurred in some form (however coalesced or convoluted), it will very often be the case that there is no evaluation process. And, even when evaluation does occur the literature on that subject suggests that it is often seen as an unsatisfactory and problematical process with little in the way of substantive implications for subsequent activities. On the one hand it is seen as something important for many versions of the 'rational model' of the policy process: a process of identifying whether something that was supposed to happen actually did happen. Traditionally the evaluation literature puts the case for rational evaluation against the rough and tumble of the political context in which it occurred. The idea that a policy process should involve the explicit identification of objectives, translated as effectively as possible into action and thus susceptible to evaluation afterwards, dies hard. On the other hand, in the real world of policy that ideal is rarely attained. What will be provided in this chapter are observations on the efforts to solve the problems in relation to this presentation of the issues about the process.

The wish to evaluate and accountability are logically linked. Inasmuch as there is a view that someone should be in control of a policy process it is pertinent – even perhaps necessary – to examine whether that control was successfully exercised. This is most evident in that model of democratic politics

that sees the policy process as the translation into action of the will of the people, but it is by no means absent from models that adopt a more complex view of what accountability implies. Here the examination of issues about accountability, which will follow the section on evaluation, will look at what is involved in processes of holding public officials to account and the ways in which this is an area of dispute. It will be shown that there are many forms of accountability, including ones that supplement or challenge traditional top-down approaches. Then issues about the way professionalism poses problems for these models are explored, picking up on themes developed in the last chapter. This takes the discussion first to the extent to which new modes of accountability are embodied in the 'new public management' (NPM) movement and second to some important ideas about direct accountability to the public.

A final section explores issues about both evaluation and accountability in the context of modern governance, recognising the way in which mixed modes of accountability often co-exist and pose questions of choice for public policy decision makers. In this way it will sum up the stress in this book on the diversity of policy issues and of policy process contexts, which leave issues about evaluation and accountability very much areas of dispute.

Evaluation

It is understandable that questions will be asked about what specific policies have achieved. There are obvious links between the desire to ensure that policy is 'evidence based' (a fundamental feature of the 'rational model' of policy formulation as set out by Simon, see Chapter 10) and then the need to see what it has achieved, with a natural feedback cycle to subsequent policy improvement. There is no wish here to argue against that ideal; rather, the question is: why does this occur so rarely in practice? Discussions of evaluation offer many answers to this question.

An important group of those answers concern themselves with social science methodology. For them the problems are rooted in issues about the difficulties of formulating a positive social science and using methods that facilitate the testing of policy impact. For those wedded to positivist social science an important problem is the difficulty in developing, in the real world, an experimental situation. The model here is the controlled trial method used in medicine with matched groups, one of which gets the new treatment to be tested while the other does not. In practice it is rare for there to be situations in which entirely arbitrary distinctions (based on controlled random selection) between who gets and who does not get the benefit of a new policy can be made. Logically some policies could not be evaluated in that way (excluding some people from

general benefits, like the reduction of pollution), but it is also the case that ethical objections may be raised even when such approaches are possible and politicians will be unhappy about what are seen to be arbitrary exclusions from benefits. There is then a search for alternatives that come close to that: broadly matched areas (see Walker and Duncan's discussion of the use of this in the UK, 2007, p. 176) or designs that compare matched groups of people who could but in fact did not secure access to the benefits of the new policy.

Alternatives to rigorous experimental designs have however been criticised for the difficulties they have in controlling key variables (see Spicker, 2006, pp. 173–4). Policy objectives are often expressed in terms of desired end states: reduction in poverty, air pollution, or unemployment etc. Throughout this book arguments have been advanced about the complexity of policy, and about the need to be sceptical about proclaimed policy goals. In any case the relationship between the most explicit and controlled policy process and its achievements may be affected by events and changes in the real world on which the policy is expected to have an impact. In theory quasi-experimental designs may try to avoid these problems – choosing very specific policy changes and adopting statistical techniques designed to isolate external influences – but they run into severe difficulties (Pawson and Tilley, 1997).

Krane sums up a discussion of methodological conflicts in this field with the observation: 'To learn that all methods are fallible and limited is not surprising news; what remains, albeit tragic, is the continuing methodological polarisation preached by some evaluators' (Krane, 2001, p. 107). In the context of this book it would be digressing too far from the main concerns to discuss the extent to which it is possible to develop social science methodologies that overcome the problems identified above. Moreover such a discussion would take us into the bigger issue of the feasibility of positivist methodologies. This is of course one of the themes that has hovered in the background in many places in the book, it was explicitly addressed in Chapter 1. If it is only appropriate to address it further here inasmuch as a further problem about evaluation studies is that there are difficulties in establishing agreed outcome variables. In policy interventions desired outcomes may be disputed. The customers of services may have expectations of services that are not shared by those who deliver them. Exceptionally services may be designed to control behaviour rather than to deliver what people want. The choice of an outcome variable may require the researcher to recognise competing policy goals, and indeed perhaps even make a choice: answering the question, 'whose side am I on?'

Fischer adopts an interestingly mixed approach to this problem in his text on evaluation. He explores the evaluation of a classic American policy intervention, the Head Start programme, to enhance the educational achievements of disadvantaged children, showing how different conclusions may be drawn about its results in terms of four considerations (Fischer, 2006):

■ 'verification': a typical positivist evaluation measuring the achievement of stated objectives (did the test scores of children in the experiment increase more than those not in it?);

- ■ 'validation': raising issues about the relevance of the programme in terms of definitions of the problem it claims to address (recognising that Head Start might be about more than education performance, for example about reducing cultural exclusion);
- ■ 'vindication': asking whether the programme contributes value for society as a whole (raising questions about whether Head Start was an appropriate response to the issues about social exclusion);
- ■ 'social choice': raising wider ideological questions about what the programme is trying to do (suggesting that there are wider questions about social exclusion in society and about the role education plays in relation to it).

The objective here is not to explore further the methodological challenge presented by Fischer's book but rather to note that his analysis highlights the fact that evaluation is in a broad sense a 'political' activity. It is here then that we see the key to the issue raised in the introduction that there is rarely a systematic connection between evaluation and policy improvement. It is interesting to note how Walker and Duncan, in an essay that may broadly be seen as making a case for evaluation, observe that:

> A moment's thought reveals that policy evaluation is not a necessary concomitant of a democratic system, especially an adversarial one such as exists in Britain. Politics is a battle for minds that is won by ideas and driven by ideology and the ballot box. Hence policies have not only to 'work', but also to be seen to work; public opinion is a key ingredient in the policy process. If politicians are ideologically committed to a policy, they may be less amenable to the 'wait and see' logic inherent in prospective evaluation. (Walker and Duncan, 2007, pp. 169–170)

This leads Walker and Duncan down the practical road of seeing evaluation as a limited activity, part of the policy development process. This is described as 'formative evaluation', defined by Spicker as

> . . . undertaken at intermediate stages in the policy cycle. Formative evaluations can take place to see whether guidelines have been followed, whether an agency is ready to start work, to see whether an agency is being properly managed, or to see whether contract terms have been complied with. (Spicker, 2006, p. 168)

This approach offers, of course, another challenge to the stages emphasis in much earlier writing about policy, and challenges the view of evaluation as a distinctive end process.

In fact, of course, inasmuch as the policy process involves (as has been argued in many places in this book) continual processes of adjustment anything other than formative evaluation may be very difficult. Consider the policy areas explored in Chapter 7, for example. In at least three of them ('making war', 'trying to control the economy' and 'reorganising health

Table 15.1 Marsh and McConnell's indicators of dimensions of policy success

Process

Legitimacy in the formation of choices: that is, produced through due processes of constitutional and quasi-constitutional procedures and values of democracy, deliberation and accountability

Passage of legislation: was the legislation passed with no, or few, amendments?

Political sustainability: did the policy have the support of a sufficient coalition?

Programmatic

Operational: was it implemented as per objectives?

Outcome: did it achieve the intended outcomes?

Resource: was it an efficient use of resources? Internal efficiency evaluations, external audit reports/assessments, absence of critical media reports

Actor/interest: did the policy/implementation benefit a particular class, interest group, alliance, political party, gender, race, religion, territorial community, institution, ideology, etc.?

Political

Government popularity: is the policy politically popular? Did it help government's re-election/election chances? Did it help secure or boost its credibility?

services') there are complex inter-related processes of policy adjustment or interventions involving interactions with other activities (or both). In respect of these – and of course particularly the first named – evaluation seems to be likely to involve a speculative activity like that undertaken by some historians exploring how history might have been different had some fateful decision not been taken.

Marsh and McConnell's (2010) contribution to this topic tackles the issues about complexity through a taxonomy of dimensions of policy success. They provide an elaborate table of 'indicators' and 'evidence' of 'policy success', from which only the former are reproduced in Table 15.1.

Marsh and McConnell are of course aware that 'whatever dimensions of policy are being considered, there are significant complexities involved in assessing success' (see also McConnell, 2010). What constitutes success can differ according to the perspective and/or interests of the participant in, or observer of, the policy process' (ibid., p. 581). This leads on to the question: in a policy process in which there are contending 'actors', what may those various actors gain from an evaluation process? For Knoepfel et al. (2007, pp. 243–9) policy evaluations represent a particular form of advice. Such evaluations may be made both by governments and by their opponents. There may then be variations in the extent to which they remain in an exclusive and narrow advisory context, providing information and recommendations for action solely at the disposal of the actor/actors who commissioned them, or they may make their evidence more widely available. There may then be variations in the ways that

evaluations are used strategically to support the *status quo*, to attack policy developments or to support the case for further change. Later in the chapter we will see how the collection of performance indicators, which can loosely be seen as a form of evaluation, looms large in modern public management. The word 'loosely' is used there since these may be seen often as rather more measures of policy system outputs than of outcomes, and are thus – along the lines outlined by Fischer – very contestable evaluation indices.

In this way we are reminded that evaluation is also a political process. This leads radical analyses of evaluation to stress the case for adding other actors to those 'top' ones that are typically seen as in charge of policy evaluation, to seek ways of securing participation in the evaluation process (Taylor and Balloch, 2005). This recognition of alternative 'stakeholders', however, may need a view of the place of evaluation in a democracy in which power holders may to some extent be prepared to pay for uncomfortable assessments of their activities. To argue for a wider approach to evaluation may be seen as an aspect of the challenge to the top-down perspective embodied in representative democracy. In this respect Krane contrasts 'the perspective of overhead democracy' in which evaluators 'are funded by and report their findings to their political superiors' with the possibility of 'operating out of a model of discursive democracy, where local communities are permitted substantial autonomy and self-rule' (Krane, 2001, p. 118). Hoppe (1999) goes beyond that simple contrast. His notion of policy analysis as 'puzzling' and 'powering' brings together the rational aspiration to 'speak truth to power' with a recognition that it is 'utopian to think of a power free politics' (Hoppe, 2010, p. 259). He recommends:

> . . . a governance of problems . . . that adopts responsible hope as its basic attitude. Power and coercion, rejection of mutual learning between rulers and ruled through deliberation and argumentation, sophisticated answers to wrong-problem problems – they are certainly here to stay. A responsible governance of problems therefore allows and furthers policy analysis in the face of power. A hopeful governance of problems assumes and actively pursues that dedicated analysis and clever citizens always, sooner or later, find ways to inject solid puzzling in biased powering. (Hoppe, 2010, p. 262)

Hoppe's argument takes us beyond the concerns of this book with analysis 'of' policy into an important argument about how people should think of analysis 'for' policy. It leads us on to the topic of accountability, since how this relationship works out in practice depends much upon how that operates.

Accountability: introduction

Accountability has been described as 'probably one of the most basic yet most intractable of political concepts' (Uhr, 1993, p. 13). Thomas, in a review of its use, argues for its restriction to describe situations 'where an authoritative

relationship exists in a formal sense' (Thomas, 2003, p. 555). Yet he recognises that there is a much wider usage:

The meaning of accountability has consistently widened over the years. The term is now frequently used to describe situations where the core features of an authoritative relationship and a formal process of enforcement are not necessarily present. Certainly, the public no longer sees account- ability in strictly legal and organizational terms. For them, accountability is a broader professional, ethical and moral construct that is achieved only when public officials, both elected and appointed, serve with a commit- ment to do the right things. (Thomas, 2003, p. 550)

This widening involves two things. One of these is recognition of the complexity of the accountability relationship in the context of modern gov- ernance, with the range of intra- and inter-organisational complexities that have been explored in earlier chapters. This is therefore something that cannot be disregarded in this discussion. The other is a confusion of 'accountability' and 'responsibility'. Criticising this confusion, Gregory says: 'accountability is a matter of political and organizational housekeeping, whereas responsi- bility is often about moral conflict and issues of life and death' (2003, p. 558). While Gregory goes on to suggest that there are problems with accountability systems that disregard these wider issues, it is appropriate to adopt the per- spective embodied in that quotation for this chapter since the concern here is with ways in which actors in the policy process are held to account, not with those wider ethical issues.

If one's starting point is a narrow rather than a wide definition of accountability, it must be recognised that accountability is an unapologetic bureaucratic concept' (Kearns, 2003, p. 583) which is particularly enshrined in traditional notions of representative government. In the study of public administration the accountability theme emerged early on in the efforts to separate politics and administration, rooted in the idea that in a democratic state politics should set the goals for administration to put into practice. That idea lives on, despite all the evidence that this distinction is difficult to make in practice. Hence, there is one approach to accountability, which we may still call the dominant one, which places politics, in the form of top-down representative government, in the driving seat.

That approach to accountability is accompanied by a legalistic view of what gives policy action legitimacy, that it should be within the framework of the 'rule of law'. This can involve, in some of the more philosophical approaches to this topic, notions like principles of 'natural' or 'common' law which derive from universal principles independent of the actions of governments (a view that features significantly in discussions of human rights and international legal principles). But in many cases, legitimacy is seen as lying in the extent to which action is authorised by either constitutional rules or specific legisla- tion. The legal approach may offer a challenge to the political approach, when judges question political decisions. But both are in the last resort top-down mandates, the product of what are seen as legitimate political processes.

Therefore, the dominant approach to accountability can be seen as a top-down one, normally buttressed by some notion of representative democracy. However, if representative democracy is to be really meaningful it needs to be recognised that the ultimate accountability of governments is to the people. In the face of deficiencies in the doctrines of representative government there are claims that people should have direct control over policy processes in ways other than, or additional to, representative democracy. Embodied in those propositions is a great deal of complexity, which could take us into issues in political philosophy well beyond the brief of this book. What is clear is that as far as policy processes are concerned, claims that functionaries should be accountable to the government are still very much in evidence.

Alongside the democratic challenge to top-down accountability will be found two other forms of accountability: bureaucratic and professional. Pollitt defines the former as 'accountability to the codes and norms within the bureaucratic context' and the latter as 'accountability to the standards laid down by one's professional body' (Pollitt, 2003, p. 93). Both of these have come under attack as involving a rejection of the democratic forms of accountability. The defence to this charge involves arguing that they embody apolitical notions of direct duty of service to the public. In that sense doctors, for example, may argue that they are accountable to their patients for the service they provide and to their peers who monitor those standards of service. But that brings us close to the widening of the concept of accountability to embrace responsibility as well, a moral responsibility that overrides ordinary accountability.

It is not proposed to evaluate here the justifications on offer for the various forms of accountability – the point here is to acknowledge that accountability is a complex and contested concept. Box 15.1 summarises the various forms of accountability.

Box 15.1	Forms of accountability

Political – direct accountability to elected representatives (recognising that these arrangements may be complex since often there are alternatives – presidents and parliaments, central and local governments, etc.).

Hierarchical – accountability to the 'head' of an organisation, a version of accountability that is often embodied in the political concept of accountability; but since the one does not logically embrace the other this should not be taken for granted.

Direct democratic – direct accountability to the public (complicated by issues about who the public are in particular cases: patients, parents, pupils, tenants, etc. or everyone, and by the fact that these will be in specifically defined geographical areas).

Legal – forms of accountability that may be secured through the courts. This may be a reinforcement to political accountability but

there will be situations in which legal legitimacy overrides political legitimacy?

Professional – governed by profession-related principles which, like some legal ones, may be considered to override political accountability.

Bureaucratic – normally a derivative from political, hierarchical or legal accountability but may be seen in some cases to involve overriding 'responsibilities' similar to those embodied in some versions of professional accountability.

All of the forms of accountability, including the direct democratic one, are often expressed in relatively simplistic top-down forms. What is meant by that is that executive bodies – prime ministers and cabinets, elected representatives of parents, etc., supreme courts, professional governing bodies, bureau chiefs – demand that others are accountable to them. The very complexity of the policy process and of modern governance makes the achievement of any simple form of accountability difficult.

Accountability to the top: the political model

Brown sets out the importance of the top-down perspective for public administration in Britain in the following way:

The formal characteristic of any public service is that in the last resort a lay politician carries responsibility for it to an elected assembly. There is a chain of command leading from the bedside and the local insurance office to the front bench in the House of Commons. In the personal social services the chain leads first to the committee room in county hall and then, because of his overall duty to guide the development of the service, to the secretary of state.

These lines of accountability give the public, through its elected representatives, the opportunity to question and influence the operation of public services. They provide constitutional channels through which grievances can be ventilated. In the very last resort they provide a means through which the electorate can withdraw support from an administration whose policies it dislikes, and substitute one more to its liking. This is the ultimate sanction in public administration . . . (Brown, 1975, p. 247)

Brown is right to emphasise how this is the starting point for most discussions of accountability. He then, of course, goes on to recognise the limitations to

this approach, saying: 'A moment's reflection, however, suggests that this needs to be supplemented in some directions and perhaps qualified in others if services are to be efficiently administered in the public interest' (ibid.).

Day and Klein similarly, in an exploration of the 'career' of the concept of accountability, chart a progression from 'simple to complex models' (1987, Chapter 1).

A recognition of these complexities has characterised the analysis of public administration at least since Woodrow Wilson's classical essay (1887) on the distinction between politics and administration. While that has been seen as supporting the view that administration must be subordinate to politics, it in fact sought to prescribe a way of separating the two in the context of the realities of American politics. Wilson sought thus to combine democratic accountability with efficient administration. Wilson was both identifying an important problem about administrative accountability and recognising that the United States faced great difficulties in coming to terms with a set of institutional arrangements that made political problem solving very difficult.

The alternative view on his politics/administration dichotomy is that this is a distinction that bears little relation to the reality of political and administrative behaviour. Evidence for this has been explored in various places in this book. But what is important about Woodrow Wilson's perspective is the way his ideal division influenced thinking about the management of government. It finds resonances not just in discussion of representative democracy but also in arguments about the 'rule of law', the concern of the next section.

The legal model of accountability and the problem of discretion

Two key ingredients in the 'rule of law' according to Wade (1982, p. 22) are:

1. 'that everything must be done according to the law', which when applied to the powers of government means that 'every act which affects the legal rights, duties or liberties of any person must be shown to have a strictly legal pedigree. The affected person may always resort to the courts of law, and if the legal pedigree is not found to be perfectly in order the court will invalidate the act, which he can then safely disregard';

2. 'that government should be conducted within a framework of recognized rules and principles which restrict discretionary power'.

The particular way those principles are enunciated by Wade may have characteristics that are peculiar to Anglo-Saxon countries, but the general thrust of the principles is accepted wherever it is claimed that governments operate within the 'rule of law'.

The importance of the 'rule of law' as a basis for legitimate rule is explored in Weber's third type of authority: 'rational-legal'. This was examined on

p. 230. Weber argues (in a text originally put together in the early years of the twentieth century):

Today the most usual basis of legitimacy is the belief in legality, the readiness to conform with rules which are formally correct and have been imposed by accepted procedure. (Weber, 1947, p. 131)

Weber goes on to distinguish a social order derived from voluntary agreement from one that is imposed – but he calls this distinction 'only relative'. The first of the ideas which he sees as central to the 'effectiveness' of legal authority is:

That any given legal norm may be established by agreement or by imposition, on grounds of expediency or rational values or both, with a claim to obedience at least on the part of the members of the corporate group. This is, however, usually extended to include all persons within the sphere of authority or of power in question – which in the case of territorial bodies is the territorial area – who stand in certain social relationships or carry out forms of social action which in the order governing the corporate group have been declared to be relevant. (ibid., p. 329)

In that rather convoluted argument, of course, lies the concept of the state. The second idea is that:

every body of law consists essentially in a consistent system of abstract rules which have been intentionally established. (ibid., p. 330)

Thus issues about the legitimacy of official rules, and the related discretions they may explicitly or implicitly convey, may be disputed with reference to their specific source, to their constitutional context or to wider principles. However, this is not a simple matter.

In Britain the absence of a written constitution gives debate about public law a peculiar shape which derives from the fact that the primary source of law is Parliament. The central concern is with whether the rules applied by public officials have the formal sanction of Parliament and whether departures from those rules (discretion) are formally authorised (or not formally proscribed) by statute. A secondary concern is with the capacity of the court system – as supplemented in the modern world by simpler grievance procedures such as tribunals and ombudsmen – to respond in situations in which citizens (singly or in organised groups) regard official behaviour as falling outside those statutorily determined boundaries.

The peculiarities of the British system (shared of course by some Commonwealth countries) contrast with those of countries with written constitutions and a supreme adjudicative body entrusted with the protection and interpretation of that constitution. In such countries, an additional test of the legitimacy of any policy process-related action will be its compatibility with the constitution. However that contrast is not as stark as it may seem. The absence of a written constitution should not be understood to imply the absence of a constitution (see King, 2007). While historically British judges

have taken a very cautious view of their responsibilities in this respect, in the last quarter of the twentieth century they began to take a more active view. This was then reinforced by the extent to which membership of the European Union required the UK to give attention to European law, and even more significantly by an Act of Parliament, the Human Rights Act (1998) which incorporated the European Convention on Human Rights into UK law, with the implication that the judges could scrutinise the compatibility of new laws with the provisions of that Act. This opens up a potential for conflict between accountability to the law and accountability to government.

But much of the detailed role of the law in dealing with accountability concerns questions about the extent to which powers exercised by administrators have been formally authorised by government. It thus particularly deals with administrative discretion. Hence what the law textbooks provide is a portrait of the law as trying to keep administrative discretion under control. In so doing the law is presented as the defender of the citizen against the arbitrary exercise of power. Wade (1982) perceives administrative law as an attempt to ensure that the 'whole new empires of executive power' conform to the principles of liberty and fair dealing. This perspective leads Wade to argue that the key issue is ensuring that the law can control 'the exercise of the innumerable discretionary powers which Parliament has conferred on the various authorities' (p. 4). His emphasis is on ensuring that such authorities do not act *ultra vires* by exceeding their statutory power or following the wrong procedures. Authorities cannot escape such control by being offered statutes that give them unlimited power, since 'in practice all statutory powers have statutory limits, and where the expressed limits are indefinite, the courts are all the more inclined to find that limits are implied. The notion of unlimited power has no place in the system' (ibid., p. 50). While it is clearly possible to see in this view of the rule of law a control over arbitrary government, it is largely transformed into a notion of control over arbitrary administration.

Two things further complicate this boldly stated application of the model of the 'rule of law'. One is the difficulties citizens experience in using the law to protect themselves from the executive. The other, very much within our terms of reference, is that these so-called statutory powers are very complicated. One view, abandoned by any realistic critic of the British legislative system at least 50 years ago, was that all rules should be embodied in formal Acts of Parliament. The reality is that there is a great deal of subordinate rule making – not only in 'regulations' which are hypothetically open to parliamentary scrutiny, but also in a variety of departmental guidance circulars, codes and working instructions to officials. These were a key concern of the discussion of policy formulation in Chapter 10.

The very institutional complexity of the policy system means that there is a wide range of bodies which have responsibilities to interpret and perhaps amplify their statutory mandates. Hence, it is not possible to draw a simple distinction between statutory rules deriving from the legislature and the discretion of officials. The intermediary departments, agencies, local governments and so on, which, from the old-fashioned perspective, can be seen as

discretionary actors themselves, engaged in subordinate rule-making processes. A considerable body of case law governs these processes.

Traditionally, British administrative law textbooks give attention to administrative discretion as a 'taken for granted' phenomenon within the political system. They point out that the concern of the courts has been with (a) whether or not the discretionary powers that are exercised have been clearly delegated by statute; (b) whether the exercise of those powers is within the boundaries of natural justice (are they exercised reasonably and with regard to due process?); and (c) the principle that if a statute grants discretionary powers then the officials using them should not devise rules which in practice fetter that discretion.

So the 'rule of law' approach to the issue of accountability primarily reinforces the top-down model of accountability, embodied in the notion of the primacy of politics in a context of representative democracy, but it may suggest that there should be wider principles to which citizens can appeal. It sets up a tension between accountability to 'Parliament' and accountability to the 'courts', which takes its most clear form in the way in which the American constitution gives the Supreme Court a super-ordinate role. It has led to recognition that the Supreme Court can be in some circumstances a 'policy maker'. A corresponding interesting feature in Europe is the role of the European Court, which is reinforced by an international search for ways of specifying and enforcing universal human rights.

This excursion into issues about legal control over policy introduces something else: concerns about the extent to which law may be comparatively impotent in the face of the complex issues of administrative discretion. A recognition of the limits to legal control over administration as well as the limits to top-down political control stimulates a search for other models of accountability. The debate about that has particularly centred on issues about professionalism.

Accountability, discretion and professionalism

Chapter 13 explored the arguments about professional discretion, showing how a case for professional autonomy has been made. That case tends to be most strongly made in relation to the role of medical doctors. Medical autonomy is traditionally defended in terms of the sanctity of the doctor/patient relationship and the needs of good medical practice. In this argument the most important form of accountability is seen as being to the patient, but it takes the paternalistic form of suggesting that the doctor's expertise enables him or her to determine what is in the patient's best interests. That is reinforced by arguments about indeterminacy in many situations and about the need for a relationship of 'trust'. A wider protection is then alleged to be offered by the fact that the doctor's behaviour is subject to scrutiny by his or her professional 'peers', who were given responsibility (by the state) for

training and accreditation, and have the power to take disciplinary action against malpractice.

However, individual clinical decisions are not merely the concern of the practitioner, the profession and the patient, at least as far as publicly financed medicine is concerned. In a situation of resource constraints (which must be regarded as a normal situation for a publicly financed health service) a response to the needs of any patient involves claims on scarce resources. It must thus – taking an overall view – be to some extent at the expense of a response to others. That issue comes to the fore most poignantly where there is manifestly a lack of resources relative to an identified need – as is the case with very expensive but comparatively unused medicines, various forms of treatment for kidney disease, or in a hard-pressed emergency unit. It is also present inasmuch as there are cost differences between professionals who carry out ostensibly the same practices, increasingly given attention in the management of public services. Concerns about these issues are then heightened by the fact that there are often waiting lists for treatments and operations. Overall, it may be contended that there is a ubiquitous requirement for all clinical work to be planned and organised against a backcloth of resource issues, which are surely public concerns.

If the need for wider public control is conceded, the question then becomes: who is to do the controlling? Here we find, alongside straightforward top-down arguments for political and legal control, some alternatives (or some combination of them): lay managers, professionally qualified managers, other professional colleagues and patients. There are problems with accountability in respect to each of these.

Clearly, the standard control model for the policy process involves appointed managers working within a remit supplied by politicians. The intense need for cost control over services like health has increased the propensity to see lay managers as having a key role to play. That view has been reinforced by the availability of new technologies (computerised medical records, systems to identify the costs of 'normal' medical procedures like those offered by the identification of 'diagnosis related groups' (DRGs), etc.).

This approach to the management of professional activity is opposed by two alternatives. One is control by managers who are drawn from the ranks of the service professionals themselves. There has been a long-standing argument about this approach to the management of professionals: do these managers retain their old professional loyalties or become co-opted to the ranks of the lay managers? There seems good reason to believe, confirmed by research led by Degeling (Degeling *et al.*, 1998, 2003), that the truth lies somewhere between these two positions. These 'managers' obviously offer scope for the development of a more sophisticated, shared accountability, but they do not, of course, open up the system to public accountability in the widest sense.

The other alternatives are variations of this. These are either the creation of a cadre of people who are involved in management but still practising their profession, or collective self-management through collegial shared participation. This is a managerial model widely favoured by professionals. However,

there are well-founded suspicions that – particularly when review processes are not shared outside the professional group (medical) audit, for example: Harrison and Pollitt, 1994) – this approach to management preserves traditional professional domination. There are also questions about whether this is an efficient use of members of an expert workforce.

This discussion has deliberately explored the doctor/patient relationship, but the arguments explored are also applicable to other, similar relationships, such as those between teacher and pupil. A view that the case of professional autonomy is weaker outside the medical profession has been embodied in arguments that in many cases it is more appropriate to speak of semi-professions rather than professions (Etzioni, 1969).

All the managerial approaches to increasing the accountability of professional service groups involve the development of performance indicators, and often then related cost measures. The use of these can be seen as a particular feature of modern approaches to accountability, embodied in concepts of new public management. These will be explored next (we return to issues of direct accountability to patients after that).

The impact of 'new public management'

It has been difficult to decide where to include a discussion of 'new public management' (NPM) in this book. Inasmuch as the NPM movement has been motivated by concerns about accountability, this is the appropriate place. However, whilst issues like control over professional autonomy have been one of the movement's preoccupations, this has been accompanied by a concern that the obvious alternative to this autonomy, top-down control of a bureaucratic kind, is also inadequate. In this respect, this discussion might have been included in Chapter 12, where the sociological work on the deficiencies of the top-down model was outlined, or in Chapter 13 where issues about street-level autonomy were examined. NPM is a response to dilemmas about public bureaucracy that go back at least as far as Max Weber's time, and it draws upon the sociological analysis of organisations stimulated by Weber's work and by the arguments about Taylorism or Fordism as well as the rational choice critique of organisational behaviour. In discussing it here, then, it is important to recognise the potential contradiction within NPM between a strong stress on accountability and a rejection of traditional forms of top-down control.

Hood (1991) identifies seven 'doctrines' to which 'over the last decade', a "typical" public sector policy delivery unit in the UK, Australia, New Zealand and many other OECD [Organization for Economic Co-operation and Development] countries would be likely to have had some exposure' (p. 4). These ideas have travelled quickly from country to country, promoted by fashionable 'gurus'. Hood does not mention the United States, but perhaps the most influential of all the NPM tracts, a book by Osborne and Gaebler (1992), comes from that country. The seven doctrines Hood identifies are set out in Box 15.2.

Box 15.2	Hood's summary of NPM 'doctrines'

1. 'Hands-on professional management in the public sector'
2. 'Explicit standards and measures of performance'
3. 'Greater emphasis on output controls'
4. '. . . disaggregation of units in the public sector'
5. '. . . greater competition in the public sector' (to this may be added actual privatisation)
6. '. . . private sector styles of management'
7. '. . . greater discipline and parsimony in resource use'.

<div align="right">Source: Adapted from Table 1 in Hood (1995), pp. 4–5.</div>

In some respects the expression NPM is simply useful shorthand for a variety of innovations, widespread across the world, which are 'dominating the bureaucratic reform agenda' (Hood, 1991, p. 3). There is a danger that the use of this shorthand expression may convey the sense of a unified and compatible set of initiatives. In a later essay (1995), despite having established himself as the leading analyst of the phenomenon, Hood attacks the view that NPM is a 'new global paradigm' and highlights some of the inconsistencies within the work of its leading exponents.

Hood indicates that NPM has been attacked for its concern to place issues about efficiency before equity (Pollitt, 1990), but he argues that NPM advocates would assert that efficiency 'can be conceived in ways which do not fundamentally conflict with equity' (Hood, 1999, p. 10, citing Wilenski, 1986).

That takes us into issues about the relationship between efficiency and accountability. Some of the NPM movement's concerns come directly from the rational choice attack (see Chapter 5) upon traditional public bureaucracy which links the two. But others – notably (1) and (4) in Hood's list – have their roots in Peters and Waterman's (1982) concerns about human relations in the organisation and the desire to create organisations where 'excellence' can be achieved by a committed workforce left to perform delegated tasks without undue surveillance. This seems to conflict with the rational choice view that public sector managers cannot be trusted to operate autonomously. A particular feature of NPM in practice has been an attack upon the traditional autonomy claims of the established professions – medicine, teaching, etc. Paradoxically, the new 'hands-on professional' managers are seen as a countervailing force to traditional professionals (Hoggett, 1996).

If the ideas are taken together as a package, these conflicts may be resolved to the satisfaction of the New Right perspective by stressing that market discipline imposes its own accountability. Managerial autonomy does not enable managers to 'buck the market'. Others, like the 'aristocratic' old professions,

it is argued, must also learn to come to terms with market discipline. But that presumes that real market discipline can be established in a public service.

Hence for others not wedded to the New Right perspective or unconvinced about the feasibility of creating a market, this mixture of measures seems to preserve the autonomy of those 'hands-on' managers at the top whilst ensuring the efficiency of response by lower-level workers to their demands through the increased insecurity entailed in the combination of strict standards and competition from alternative providers (Hoggett, 1996). Relevant here is Pollitt's summary of the impact of NPM (2003, Chapter 2), in which what is particularly stressed is its emphasis upon the use of performance targets to impose accountability. In that sense NPM can be seen as an effort to secure tight controls over public organisations without recourse to traditional bureaucracy.

A characteristic of NPM in the United Kingdom (and probably in Australia and New Zealand too) is that it has been very much a 'top-down' movement. Reform of central administration has not involved decentralisation. The 'dis-aggregated units' Hood refers to have been subject to tight controls. There are grounds for arguing – with respect to the development of quasi-autonomous agencies – that the operational freedom of these consists merely of a freedom to take the blame. At the lower levels British local government has experienced steadily tightening financial control, strong steering to ensure that its interpretation of NPM is compatible with that of the government and requirements to accept and stimulate competition that has weakened its capacity to respond to local political forces (Butcher, 2002; Deakin and Walsh, 1996; Hoggett, 1996; Walsh, 1995).

Research evaluations of the key NPM developments have been slow to emerge and have produced equivocal findings (see Pollitt, 2003, Chapter 2). There are grounds for believing that the achievements of NPM will be limited. Realistic competitive 'markets' are hard to create. (See the discussion of transaction costs on pp. 278–80.)

The 'search for excellence', or 'reinvented government', has involved an attempt to put a 'post-Fordist' form of administrative organisation into place to combat the bureaucratic 'diseases' associated with traditional hierarchies. Yet there is a conflict between this remedy for inefficient government and 'rational choice' theory, which sees bureaucratic autonomy as a key cause of the uncontrollable growth of government. It is also necessary to note the conflict between the case for the flexible organisation in which staff have high discretion and the use of rules to secure accountability.

The solution to this dilemma has been seen to involve two ideas. One of these is that control should deal with broad general parameters, leaving much detail to be settled at the 'street level'. This is the idea of the loose/tight organisation of 'steering' not 'rowing' (Osborne and Gaebler, 1992). Steering is seen as involving the setting of the financial framework and the specification of a range of incentives (Kickert, 1995, pp. 149–50). It must be questioned how much this is really new, and how much it is merely another approach to analysing the hierarchical structure of discretion, explored in relation to the points quoted from Simon and from Dunsire in Chapter 12 (see also Hoggett's criticism of Kickert: Hoggett, 1996). Nevertheless it does suggest the need for the co-existence of two forms of accountability.

The other approach to control involves emphasis upon retrospective controls requiring the collection of information on performance, hence bringing the discussion here back to issues about evaluation. Rewards or sanctions are applied on the basis of such data. The crucial sanction may be the termination of a contract if a quasi-market system is operating. Some commentators on British public policy in the 1990s have seen developments of this kind as a retreat from accountable public administration (Baldwin, 1995). Others have seen it as a rather bogus loosening of control – taking out some actors who might have played a role in accountability such as local government (see Glennerster *et al.*, 1991) – whilst financial constraints and fear of sanctions reinforce strong central control (Deakin and Walsh, 1996). Some forms of managerial control have been enhanced at the expense of professional autonomy, particularly where those managers hold values compatible with the pro-market 'right' (Hoggett, 1996). Clarke and Newman (1997) have seen 'new managerial regimes as producing a field of tensions', an 'unstable settlement between bureau-professional power and the new managerialism' (Newman, 2001, p. 31).

At the same time it is still necessary to draw another lesson about the use of rational devices in the control of administrative behaviour, for example management by objectives and quantitative staff assessment, from Blau's old study (1955). He demonstrates how performance indicators used in the evaluation of work may distort bureaucratic behaviour. Individuals not only set out to 'cook' their own performance statistics but choose to emphasise those activities that will maximise the score achieved by themselves and their agency (see Box 13.3 reporting Brodkin's account of what may happen in this case). It is through the use of output rather than outcome measures, whose collection and analysis is facilitated by computer technologies, that much retrospective control over discretion is sought. This is one of the ingredients in the curious mix of apparent neo-Fordism with a reversion to Fordism in the public sector (Hoggett, 1996; Pollitt, 1990).

Some activities are much more easily measured than others, hence performance indicators that offer a distorting impression of a public service activity as a whole may come to have an excessive influence. Allied to this issue is the fact that some of those measurements most likely to impress are those that embody data on costs or can be translated into money terms. Therefore issues about effectiveness in education have often been translated quite spuriously into indicators of 'value added' for individuals and/or the national economy (Wolf, 2002).

Measurement activities may empower another group of people: experts in measurement and other forms of auditing. Such people may be every bit as difficult to bring under accountability systems as the people whose activities they measure. Hence Power has exposed some of the problems with auditing, raising questions about how auditors are audited (or more often, how they are not audited) (Power, 1997). Overall, what may be occurring is the enhancement, at the expense of professional service staff, of the power of those who monitor and measure their work, creating new kinds of 'professional dominance' among accountants, lawyers and managers (see Alford, 1975, and

Ham, 1992, on 'corporate rationalisers', and developments of this theme in
Flynn, 1991, and Harrison *et al.*, 1990).

The NPM movement claims to have ways to deal with these issues, but
the discussion of their complexity suggests reasons to be sceptical about
those claims. This is supported by Hood's analysis of the extent to which
management changes under the influence of NPM produce 'side-effects and
even reverse effects'. He borrows Sieber's (1981) notion of 'fatal remedies' –
'producing the opposite of the intended effect' – to analyse these (Hood, 1995,
pp. 112–16). Among them the erosion of trust and the adverse effects of elabo-
rate rule structures and reporting requirements loom large (see also Power's
(1997) attack on 'the audit explosion').

Dunleavy *et al.* argue that:

The "new public management" (NPM) wave in public sector organizational
change was founded on themes of disaggregation, competition, and incen-
tivization. Although its effects are still working through in countries new
to NPM, this wave has now largely stalled or been reversed in some key
"leading-edge" countries. This ebbing chiefly reflects the cumulation of
adverse indirect effects on citizens' capacities for solving social problems
because NPM has radically increased institutional and policy complexity.
(2006, p. 467)

As indicated here the combination of a mixture of themes and aspirations
with the continuing imperatives of a top-down oriented approach to govern-
ance limits the applicability of NPM as something radically different. It is in
many ways better to single out distinctive themes within it, as Dunleavy and
his associates do in respect of the interest in measurement and the new tech-
nologies that make that feasible.

Alternative ways of conceptualising NPM have been put forward which
recognise the force of the Peters and Waterman (1982) critique of bureauc-
racy and accept the importance of performance measures as indices to be
shared with the public but reject the market orientation of much of the
rest of the thinking. This approach tackles the issue of accountability not
by the adoption of market devices but by trying to put bottom-up notions
of accountability in place of the traditional top-down ones (Hoggett, 1991;
Stewart and Clarke, 1987). This is explored in the next section.

A good approach to exploring the issue of consumer control is offered by
Hirschman's (1970) analysis of the options available to consumers (in both
public and private systems) as being 'exit, voice or loyalty'. This approach,
which can be seen as related to ideas about the use of 'rational choices' by
people, suggests that the exit option is the simplest. But is it easy to use and
does it effectively secure accountability to consumers?

A feature of NPM that has been noted is the development of competition within public services, either through competitive arrangements within these or by allowing private providers to offer public services. It is important to note that the exit option depends not just upon the availability of alternatives but also on information about what these alternatives actually offer. Constraints are also imposed by the fact that exit carries 'transaction' costs for consumers (getting appropriate information, negotiating changes and adapting to new arrangements). Market systems are more likely to provide realistic choices at the point at which people start consuming a service – choose a doctor, a hospital or a school, for example – rather than when they are already consuming it. In that sense it is not so much 'exit' options that people have in systems of public choice as 'entry' options. These points are particularly pertinent as far as health and social care services are concerned.

'Voice', the alternative to exit, involves seeking ways to increase 'grass-roots' public accountability through forms of participation. Perhaps the chief characteristic of this approach has been to seek to establish ways of decentralising decision making to the local government level or below it (particularly where, as in the UK, local authorities are large).

This leads us to an approach to professional accountability that has been widely canvassed, one which offers a combination of political accountability and accountability to consumers by stressing localised 'political' control mechanisms. Thus Lipsky argues for a new approach to professional accountability in which there is more emphasis upon client-based evaluation of their work (Lipsky, 1980, final chapter). Similarly, Wilding (1982) writes of the need to realise 'a new relationship between professions, clients and society' (p. 149), precisely because others have so little control over them. Stewart and Clarke (1987) offer a related approach in terms of the idea of a 'public service' orientation committed to accountability to local citizens' groups.

The main, perhaps rather dismissive, point to make here is that it represents more an aspiration than a properly tried form of accountability. It comes into direct conflict with concerns about territorial justice, which emphasise the need for uniformity of services. It can also be seen as difficult to integrate with concerns about interactions between services – the demand for 'joined-up government' (see Newman, 2001, for an analysis of these tensions in the UK). However, as indicated at the beginning of this chapter, if accountability ultimately means accountability to citizens, then the issues about how to do this other than through representative government are bound to be on the agenda.

Accountability and governance

While academics may dismiss the political preoccupation with top-down accountability, the issue remains very much alive. It has, however, to confront the reality that new approaches to public administration make the issues about control over the policy process much more complicated. Central to

this development was, first, the exploration of public policy delivery through private organisations using market mechanisms and public–private partnerships, followed by recognition of the importance of networks for policy delivery. This is summed up by Pollitt as follows:

there are two sets of reasons why a simple, single accountor and single accountee model of accountability is an inadequate description of reality. First, many public managers find themselves working in partnerships or contractual relationships, where different parties are accountable for different aspects of a joint activity (multiple accountors). Second, even where a public manager is working within a single institution they will often have several lines of accountability – political, legal, professional, bureaucratic (multiple accountees). (Pollitt, 2003, p. 94)

These are the more concrete issues within the shift from government to governance explored in Chapter 14 and expressed in wider terms by Hajer and Pierre as leading to democratic deficit, and requiring therefore the emergence of new modes of participation.

Adler comes to this same issue with a rather different concern: that of the citizen in search of a mode of redress when dissatisfied with administrative action. The way he extends Mashaw's three models of administrative justice was noted at the end of Chapter 13. From that extension, he arrives at six 'normative models' that have similarities with the forms of accountability listed by Mashaw. These are set out in Table 15.2.

If we put Pollitt's emphasis on complex accountability and Adler's model together we may note that citizens often have choices between more than one mode of redress (and of course the possibility of using two together). Earlier sections of this chapter have explored some of these combinations and interactions: the complex mix of professional and hierarchical forms of accountability, the role of a market regulated through auditing and contracts (something missing from Adler's taxonomy) and the possibility of choices between exit and voice in consumer control. But capacity to secure individual attention and hopefully redress in respect of specific policy issues is not democratic participation in the full sense.

Table 15.2   Adler's models of administrative justice

Model	Mode of accountability	Mode of redress
Bureaucratic	Hierarchical	Administrative review
Professional	Interpersonal	Second opinion or complaint to a professional body
Legal	Independent	Appeal to a court or tribunal
Managerial	Performance indicators and audit	Publicity
Consumerist	Consumer charters	'Voice' and/or compensation through Consumer Charters
Market	To owners and shareholders	'Exit' and/or court action (private law)

Source: Modified version of Table 3 in Adler (2006), p. 622

A 'realistic' approach to evaluation and accountability

The title Hogwood and Gunn used for their book on policy analysis, *Policy Analysis for the Real World*, implied a realism absent in some other work. In their concluding section, indeed, they indicate that they are 'interested in the role of policy analysis in the policy process rather than simply the academic study of the policy process' (1984, p. 268). In the first chapter of this book the latter approach was justified in terms of the argument that effective engineering needs to be grounded in a good understanding of physics rather than by drawing a distinction between an academic analysis and an analysis for the real world. In that sense the claim of realism in the heading of this section rests upon the view that those two notions, inevitably particularly important for prescriptive policy analysis – evaluation, concerned with asking what actually happened, and accountability, concerned about who is in control – need to be put in the context of the exploration of the characteristics of the policy process explored in the previous chapters of this book.

The approach adopted in books like Hogwood and Gunn's, defended as equally oriented to assisting those in favour of or against specific policy initiatives (ibid., p. 269), is open nevertheless to the accusation that the key concepts come from ideologically or politically dominant perspectives. Throughout this book the problems in respect of one particular dominant perspective – the stages model or policy cycle – have been emphasised. However, there are alternative problems that have to be faced by any attempt to offer a detached and value-neutral account of the policy process. The physics/engineering distinction does not actually work well for the social sciences, where there is no broadly accepted framework of theory in which law-like propositions can be located. Instead there are contending schools of thought, and there are good reasons for suggesting that social scientists cannot be detached observers of social reality. Moreover the closer one gets to matters of fundamental ideological and political differences the more likely this will be true.

A particularly problematical area for any discussion of the policy process is the fact that some of the most challenging propositions in the field are theories deduced from general assumptions about political activity which have been subjected to little empirical testing, in a discipline in which testing is in any case a difficult activity. This issue was particularly highlighted in the discussion of rational or public choice theory in Chapter 5. However, whilst that theory is particularly open to challenge inasmuch as it sweeps up a range of difficult explanatory problems using one over-riding assumption – that behaviour is self-interested – there are other theoretical propositions in the book that raise comparable if more limited difficulties (some of the ideas embedded in institutional theory for example).

There are also difficulties arising from the fact that where evidence is available to enable generalisations about the policy process to be advanced this tends to come from studies in a single country, with its own distinctive culture and institutional system. It is then a risky undertaking to offer

those generalisations outside the context in which they were developed. For example, it was noted that Kingdon's account of agenda setting which is advanced as generally useful is nevertheless based solely on careful observation in the United States. Similarly it was shown that concerns about the working of federalism in that same country have had a major influence on the development of implementation theory.

Finally, while the objective of emphasising description rather than prescription was emphasised in Chapter 1 and has been re-emphasised elsewhere, it has been necessary to draw upon policy analysis writings which mix these two, drawing prescriptions from observations or assumptions about the 'real world' as they see it. That brings us back to the subject matter of this chapter, concerned as it is with two questions that are of fundamental importance for prescriptive policy analysis: what happened, and how was control over the policy process exercised? Those then have to be the starting points for the prescriptive questions. All participants are concerned about the issues about 'what happened'. Evaluation questions, in principle, concern us all. The interest in notions like consumer participation in evaluation and the sharing of learning from evaluation (see Taylor and Balloch, 2005) show an aspiration to embrace this perspective. On the other hand much actual evaluation work is embedded in a traditional top-down concern that those with power to influence policy get what they want. A wide rather than a narrow view of policy accountability can operate as a counterweight to that. But the concern here has been to emphasise the way in which accountability is contested. The great virtue of the work of the early top-down theorists, eager to make prescriptions for rational policy making, was that they emphasised issues about purposive action and control over policy processes. Those issues remain important regardless of the stance one takes on who should be in control.

CONCLUSIONS

Evaluation and accountability are inevitably subjects that attract considerable controversy in discussions of public policy. In conformity with this book's concern with examining the policy process, this chapter has tried to avoid taking a stance in the debate about who should be in control and how they should do it. It has been noted that the view that, in a system of representative government, the administration of public policy should be hierarchically controlled by elected representatives has dominated the literature. When a traditional top-down view of the system has been challenged, that challenge has involved either the assertion that the complexity of modern governance requires that it should be supplemented by other forms of accountability or efforts to establish alternative 'democratic' legitimacy from a bottom-up perspective.

(continued)

However, identification of the complexity of accountability has long involved a recognition of forms of legal accountability (normally reinforcing hierarchical political accountability but occasionally challenging it). More complexity has then been added by a recognition of ways in which the elaborate nature of many public activities involves extensive discretionary decision making. Consideration therefore needs to be given to the roles of professional groups and to the way in which forms of co-production occur. An alternative approach to these issues, coming particularly from the 'rational choice' school of thought, suggests that in various respects consumer participation can be enhanced to deal with these issues through market and quasi-market mechanisms providing 'exit' (or as noted above, more realistically 'entry') options. An alternative is to try to strengthen 'voice' at the 'street level'.

All of this adds up to recognising that accountability in modern governance is bound to be complex. It will often be mixed, involving multiple forms of accountability to multiple groups. This has then, as noted, consequent implications for how it is evaluated. In examining these issues, attention needs to be given to the very different ways in which different public policies are made manifest, a theme that has recurred throughout this book.

Many of the key themes in the book as a whole have surfaced again in this chapter. The traditional approach to evaluation and accountability has been seen as part of that consensus about representative government within which the rational model of decision making and the top-down model of implementation also belong. This has been challenged both by an ideological pluralism which sees the need for multiple 'accountabilities' and by those who see networks and complex institutional arrangements as making any simple form of accountability difficult. In the background, and not analysed much in this chapter but emphasised in the early chapters of the book, lies another view – one which sees the structure of power as imposing severe limits on any form of popular accountability.

Throughout the book it has been stressed that there is a need to think about the policy process as a whole, even when analysis requires parts of the process to be separated out. It has also been stressed that it is important to see that the policy process is embedded in the structure of power in society. At the same time there is a need to recognise that it is not easy to generalise about the policy process, inasmuch as different policy issues emerge in different ways in different institutional contexts. The art of policy process analysis needs to involve a capacity to see connections, and to compare and contrast, whilst being sceptical about all-encompassing generalisations.

References

6, P. (2004), 'Joined-up government in the Western world in comparative perspective: A preliminary literature review and exploration', *Journal of Public Administration, Research and Theory*, 14 (1), pp. 103–38.

Aberbach, J.D., Putman, R.D. and Rockman, B.A. (1981) *Bureaucrats and Politicians in Western Democracies*. Cambridge, MA: Harvard University Press.

Adler, M. (2006) 'Fairness in context', *Journal of Law and Society*, 33 (4), pp. 615–38.

Aglietta, M. (1987) *A Theory of Capitalist Regulation: The US Experience*. London: Verso.

Ainley, P. (2001) 'From a National System Locally Administered to a National System Nationally Administered: The New Leviathan in Education and Training in England' *Journal of Social Policy*, 30 (3), 457–476.

Albrow, M. (1970) *Bureaucracy*. London: Pall Mall.

Alden, C. and Aran, A. (2012) *Foreign Policy Analysis*. Abingdon: Routledge.

Alford, R. (1975) *Health Care Politics*. Chicago: University of Chicago Press.

Allison, G.T. (1971) *Essence of Decision*. Boston, MA: Little Brown.

Anderweg, R.B. and Irwin, G.A. (2002) *Governance and Politics in the Netherlands*, 2nd edn. Basingstoke: Palgrave Macmillan.

Argyris, C. (1964) *Integrating the Individual and the Organisation*. New York: Wiley.

Arts, W. and Gelissen, J. (2002) 'Three worlds of welfare capitalism or more?', *Journal of European Social Policy*, 12 (2), pp. 137–58.

Ashby, E. and Anderson, M. (1981) *The Politics of Clean Air*. Oxford: Clarendon Press.

Ashford, D.E. (1986) *The Emergence of the Welfare States*. Oxford: Blackwell.

Atkinson, M.M. and Coleman, W.D. (1989) 'Strong states and weak states: Sectoral policy networks in advanced capitalist economies', *British Journal of Political Science*, 19, pp. 47–67.

Atkinson, P. (1985) *Language, Structure and Reproduction*. London: Methuen.

Auster, R.D. and Silver, M. (1979) *The State as a Firm: Economic Forces in Political Development*. The Hague: Martinus Nijhoff.

Axelrod, R. (1984) *The Evolution of Cooperation*. New York: Basic Books.

Axelrod, R. and Keohane, R. (1985) 'Achieving cooperation under anarchy: Strategies and institutions', *World Politics*, 39 (1), pp. 226–54.