

**ACCOUNTABILITY IN EASTERN AND WESTERN EUROPEAN
DEMOCRACIES: AN EMPIRICAL ANALYSIS OF A RADIAL CONCEPT**

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Abstract

This thesis deals with a central concept of democracy which is political accountability, its meanings and empirical instances in Eastern and Western Europe. The concept of accountability has been often used in the comparative politics literature, however few authors have tried to pin down its meanings. Moreover, until recent conceptualizations that are based on the model of radial categories, accountability could hardly be studied empirically due to its ambiguous meanings. The qualitative content analysis of accountability in Hungary, France, Romania and UK focuses on the laws of access to public information in these countries, as institutional mechanisms of accountability. In order to assess the societal and representative accountability in the four countries, the quantitative descriptive analysis concentrates on the implication of citizens in the process of political accountability by evaluating the number of citizens that contact politicians and the citizens' participation in public protests. The results show that there are little differences between East and West concerning the legal provisions on the access to public information. Furthermore, the willingness of the citizens to hold state officials accountable, through other means than elections, is low in all the four countries. In conclusion, France and the UK do not necessarily perform better than Hungary or Romania with regard to societal and representative accountability. Nevertheless, the comparison has a limited scope, but future studies could focus on the differences concerning other subtypes of accountability, in old and new democracies.

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INTRODUCTION

The vast and insightful literature on democratization that has its roots in the political transformations of the 1970s (Whitehead 2002, 1), had emphasized most of the key concepts of democracy and set the normative guidelines for the Third Wave of democratization¹. Some authors have focused on the rule of law (O'Donnell 2004), while others have pointed to the importance of contestation and participation (Dahl 1971) or tried to come up with broader definitions of democracy (Schmitter and Karl, 1991). However, all these authors share a common point: the issues of functional democracy should be studied as deriving from substantive definitions of democracy and should go beyond the procedural elements of a democratic regime². In other words, while free and fair elections are undoubtedly essential for the existence of a democratic regime, other elements, such as civil rights, political representation and participation or political accountability are important for the quality of democracy. For instance, O'Donnell notes that besides meeting the procedural, institutional, criteria of democracy, the countries of the Third Wave of democratization raise new problems regarding the actual practice of democracy (O'Donnell, Cullell and Iazzetta 2004, 9). These problems mainly regard high inequality (social, economic, political), a deficit in the rule of law and low democratic political culture that in turn affect the consolidation of democracy or the quality of democracy.

This thesis deals with a central concept of democracy which is political accountability, its meanings and empirical instances in Eastern and Western Europe. The concept of accountability has been often used in the comparative politics literature, however

¹ For instance, "Transitions From Authoritarian Rule" written by Schmitter, O'Donnell and Whitehead in 1986, was an inspirational book for many disident leaders in communist Eastern Europe.

² By procedural definitions of democracy I understand the minimal definitions of democracy like the one proposed by Joseph Schumpeter in *Capitalism, Socialism and Democracy*, New York: Harper Collins, 1950. These definitions are, conceptually, on a higher level of generalization, where democracy takes up less defining attributes (see Collier and Levitsky, 1997).

few authors have tried to pin down its meanings. Moreover, until recent conceptualizations that are based on the model of radial categories (Lindberg 2009; Schedler 1999; Stângă 2008), accountability could hardly be studied empirically due to its ambiguous meanings³. The importance of this concept stems from a widely used definition of democracy, that is “a system of governance in which rulers are held accountable for their actions in the public realm by citizens, acting indirectly through the competition and cooperation of their representatives” (Schmitter & Karl 1991, 76). Even though this definition is not all-encompassing⁴, it emphasizes a central element of democracy that goes to the root of this broad concept: citizens must be ultimately the holders of political power that they indeed delegate to their representatives. Political accountability “is built into the notion of representative government that the representatives must in some way render account to those on whose behalf they claim to act” (Whitehead 2002, 93). As a consequence, accountability refers to the mechanisms that control the way politicians make use of the power they were invested with.

The brief overview of previous research on different aspects of democracy and democratization, emphasized two major points. Firstly, it was a strongly positivist approach in political science, inspired by the events of the Third Wave of democratization. Scholars have developed the conceptual frameworks and wrote about democratization by focusing on the problems faced by these countries. Secondly, it was also strongly normative, outlining the goals and the democratic standards that should be accomplished not only by the new democracies but also by the established ones. These two aspects of the literature on democratization point towards further questions: are there still major differences between

³ A radial concept is defined by a central category that contains all the defining attributes of a concept (in this case, “accountability”). Sub-categories share some attributes with the central category, but do not necessarily share the same attributes between them (see Collier and Mahon 1993). For example, “accountability” is a core concept, while “fiscal accountability” and “societal accountability” are sub-categories of the core concept. The difference between classical and radial concepts is explained in the next chapter of this paper.

⁴ By “all-encompassing” I mean that there is more to the concept of “democracy” than “representation” or “accountability”, as I have argued in the previous paragraph.

younger and older democracies in Europe today, concerning various aspects of democratic institutions? If yes, what institutions exactly differ between these countries?

Around twenty years have passed since the fall of the communist regimes in Central and Eastern Europe and more than half of these countries are now consolidated democracies and members of the European Union. They have reached a certain threshold where the idea of a comparative assessment of different elements of democracy, such as accountability, in Eastern and Western European countries is not so far-fetched anymore (see Schmitter 2004, 50).

The main question of this research paper is the following: *what are the differences and similarities regarding political accountability in Eastern and Western European democracies?* The time frame of this comparison spans over the last ten years for two reasons: the collapse of the communist regimes and the emergence of democracy in Eastern Europe occurred at the beginning of the 1990s together with the first free elections. The second reason is due to the availability of part of the data that I will use (and which is described further on).

The cases I selected for this research are Hungary, Romania, France and the UK. There are at least three reasons behind this selection. Firstly, after 20 years of democratic rule, an assessment of the differences and similarities in accountability between former communist countries in Eastern Europe and Western European democracies, has not been made.

Secondly, there are many differences between the four countries. Compared to Hungary and Romania, France and UK have a longer democratic experience. There are also differences between the two Eastern European countries concerning their evolution towards consolidated democracies. From this point of view Hungary became a consolidated democracy earlier than Romania (Linz and Stepan 1996). Therefore, differences concerning

institutional aspects such as accountability might also be observed between Hungary and Romania.

Finally, the under-developed concept of accountability, its radial structure and the methods of analysis that have to be used due to these two factors need careful application through a small-N study. Moreover, previous literature has pointed towards significant differences concerning formal and non-formal democratic institutions between older and younger democracies (Linz and Stepan 1996; O'Donnell 1996). One of the implicit aims of this paper is to observe any such differences (or the lack thereof) between four Eastern and Western European democracies.

This research is not based on the assumption that Western democracies have a higher level of democratic quality, for reasons already outlined in the literature (see Schmitter 2004: 50-1). On the contrary, my research question seeks to find out if there are any major differences between these “old” and “new” democracies that would reinforce or infirm that assumption. This research is not driven by an idealistic view of democracy (see Schmitter 2004: 51) and it acknowledges the imperfections that are present even in “old” European democracies. The rationale behind it is again the opposite, that is, to find out whether “old” democracies do better than “young” democracies regarding accountability.

In order to answer the research question I will pursue the following steps. The first chapter will present the main perspectives in the literature on accountability and the main definitions that have been given to this concept. Here, I emphasize that accountability has only recently become the focus of a debate that is meant to clarify its meaning and set the ground for an empirical analysis. Two important works converge towards a radial concept of accountability that will also be adopted in this research. However, this thesis will deal with only one dimension of accountability. Furthermore, I will argue that the most important aspect of accountability concerns the relation between state officials and citizens. Citizens

can act directly or through civil society organizations as agents of political accountability. Even though elections are an important aspect of accountability, there are structural shortcomings, like retrospective or prospective voting (see Przeworski, Stokes and Manin 1999) that make them a less effective mechanism of control. Therefore, I take other aspects of vertical accountability into consideration that are at least as important as elections. Building on the idea of “societal accountability” proposed by Smulovitz and Peruzotti (2000), this chapter will clarify the scope of the research as it is derived from the theory presented in the previous chapter.

In the second chapter, from the conceptualization of accountability, I describe two methods of analysis that will provide the results for the comparison of the cases: one dealing with the individual perspective on accountability and another for the institutional instances of accountability. More precisely, the quantitative descriptive analysis will focus on the implication of citizens in the process of political accountability by evaluating the number of citizens that contacted politicians and their participation in public protests. The qualitative analysis will focus on the characteristics of the legal frameworks regarding the access to public information. These legal frameworks are essential to the mechanism of accountability, as they specify which information can be used to judge the conduct of state officials. Documents such as public contracts, minutes of public bids or local council meetings, can be used by civil society “watchdogs” or even ordinary citizens to assess state officials’ activity.

The third chapter deals with the empirical analysis of different types of accountability. In the first part of this chapter I present the characteristics of the Freedom of Information Acts in each of the countries that are included in this study, focusing on the differences and similarities between these legal frameworks.

The second part of the third chapter is the quantitative descriptive analysis of the relationship between citizens and politicians. As the process of accountability concerns the

relation between citizens and state officials it is important to observe how often do citizens contact politicians. Here I will describe the results in detail that will show the variation across cases as well as the significance of this variation that will be measured through ANOVA tests.

The conclusion emphasizes the relevance of this research and makes further recommendations for the empirical research of accountability. Firstly, the results of this research will offer a comparative image on the mechanisms of political accountability in Eastern and Western European democracies. Hopefully, it will be much more clear how exactly the legal frameworks support the accountability mechanisms and whether citizens are actually interested in holding state officials and institutions accountable.

Secondly, the concept of political accountability is rather poorly represented in the literature and even less emphasized in empirical studies. One of the reasons might be that the concept has been criticized for its ambiguity and therefore it is quickly abandoned. However, I believe that accountability is a central element in a democracy, especially in young democracies, where the divide between the political arena and the society is still significant. The future of democracy and the constant thrive to improve the quality of democracy can benefit from studies on accountability. Therefore, in the conclusion I present some possible causes behind the results of the empirical observations.

Ultimately, the aim of this paper is to point out the differences and similarities regarding mechanisms of political accountability in France, UK, Hungary and Romania. The purpose is to give an assessment of the differences and similarities in accountability between four European democracies that had different democratic experiences. By supporting the normative claim that political power has to be used in such a way that citizens have the chance of tracing down the decision making process of the government, I argue that the most

important instance of accountability is between the citizens or civil society on the one hand and the state officials, on the other hand.

CHAPTER 1: ACCOUNTABILITY. THEORETICAL AND CONCEPTUAL BACKGROUND

In order to clarify the object and the scope of this research, some fundamental questions need to be addressed from the outset: what is accountability? What are the limits of this concept? Who are the agents of accountability or who is accountable to whom?

Andreas Schedler argues that political accountability is a multidimensional concept that entails “answerability” of the accountable agents for their actions as well as “enforcement” of punishment for unaccountable actors (Schedler 1999: 14-6). The concept, thus, defines two separate processes: “answerability” is the phase of political accountability in which government officials provide answers to questions regarding their activity, duties, decisions, etc. (Schedler 1999: 14-5). “Enforcement” is that part of accountability which refers to the sanctions applied to those who are held accountable, for misbehavior. According to Schedler, “accountable persons not only tell what they have done and why, but bear the consequences for it” (Schedler 1999: 15).

Pointing to a spatial model, O’Donnell argues that there are two dimensions of accountability. Firstly, one can talk about vertical accountability which refers to the way politicians are held accountable by the citizens who delegated them the power to govern. Secondly, the concept of horizontal accountability refers to the accounting mechanisms between the state institutions, especially independent state agencies that have the role of controlling and submitting unlawful actors to justice (O’Donnell: 1998). This perspective was met with the criticism that usually state institutions tend to collude when faced with issues of accountability and that besides these two types of accountability, we can talk about “oblique accountability” (Schmitter 1999: 60). “Oblique accountability” refers to semi-state agencies (such as NGOs) that exercise their right of asking explanations from accountable politicians.

However, there is widespread agreement that as a general rule of democracy, public authorities should be accountable to citizens for the decisions they make.

Delmer D. Dunn refers to the same observation about the “collusion” between state institutions, when he talks about the “mix” between elected and non-elected representatives (1999: 298). Dunn believes that “accountability focuses on the obligation owed by all public officials to the public, the ultimate sovereign in a democracy, for explanation and justification of their use of public office”. He argues that “the bureaucracy’s growth in power poses important problems in a democracy because it creates the possibility that unelected officials can decisively impact policy, potentially in ways that disregard public preferences” (Dunn 1999: 297). Therefore, it is important to assess to which extent non-elected public officials can be held accountable. If bureaucrats are supposed to be supervised by elected representatives, but the process of collusion between state institutions takes place, it is important to assess the accountability relations between other actors (citizens and civil society, on the one hand, and bureaucrats and politicians, on the other hand) and state institutions.

Other authors have emphasized the importance of accountability for the idea of “good governance”. From that perspective, the transparent management of public funds plays a key role. Accountability “is defined in terms of responsibility (traditionally limited to that of the governments and public officials to the electorate) and accounting or answering for actions, particularly expenditure” (Moncrieffe 1998: 389). However, accountability *per se* is not the equivalent of good governance. There are many other concepts that might be taken into consideration in an analysis of good governance, such as corruption, economic growth and so on. Basically, good governance can be present with low levels of accountability, as the former largely depends on leadership abilities rather than their commitment to the citizens.

In another study on accountability Strom describes the chain of delegation of power from the citizens to representatives, the executive and the civil servants in parliamentary and presidential systems. He argues that parliamentary systems are less effective in accountability due to the lower number of directly elected officials than in the presidential systems (Strom 2000: 272-3). Even though, theoretically his argument is well grounded, it still does not provide empirical evidence that would support his differentiation between parliamentarism and presidentialism.

In the introductory chapter of “Democratic Accountability in Latin America”, Scott Mainwaring focuses on the institutional aspects of political accountability. He argues that accountability concerns “the relationships that *formally* give some actor the authority of oversight and/or sanction relative to public officials” (Mainwaring 2003: 7). In other words for Mainwaring, the concept of political accountability is only relevant as long as there are institutional mechanisms that make it relevant in the real world. Furthermore, this “implies not only answerability but also the *legal obligation* to answer” (Mainwaring 2003: 7). In fact one could assume that in a liberal democracy, with a rule of law⁵, the legally binding obligation to “answerability” matters the most. Public officials cannot be held accountable except through the provisions of the law. This theoretical contribution will become more relevant in Chapter V, on the analysis of Freedom of Information Acts. There, I will focus on the institutional framework that shapes the legal mechanisms of accountability.

As the literature shows, accountability is a complex concept that involves many political actors, at different levels: one can talk about vertical and horizontal accountability or even oblique accountability. Nevertheless, these conceptualizations have not considered the radial structure of accountability. Any comparative analysis must first specify what are the structure and the meaning of the concepts it aims to study.

⁵ See O’Donnell, 2004b.

In the next subchapters I support the argument that accountability is a radial concept. Furthermore, using the theories of representative democracy that emphasize the sovereignty of the people (and the control that they exercise on their leaders), I argue that the most important aspect of accountability concerns the citizens and the state officials.

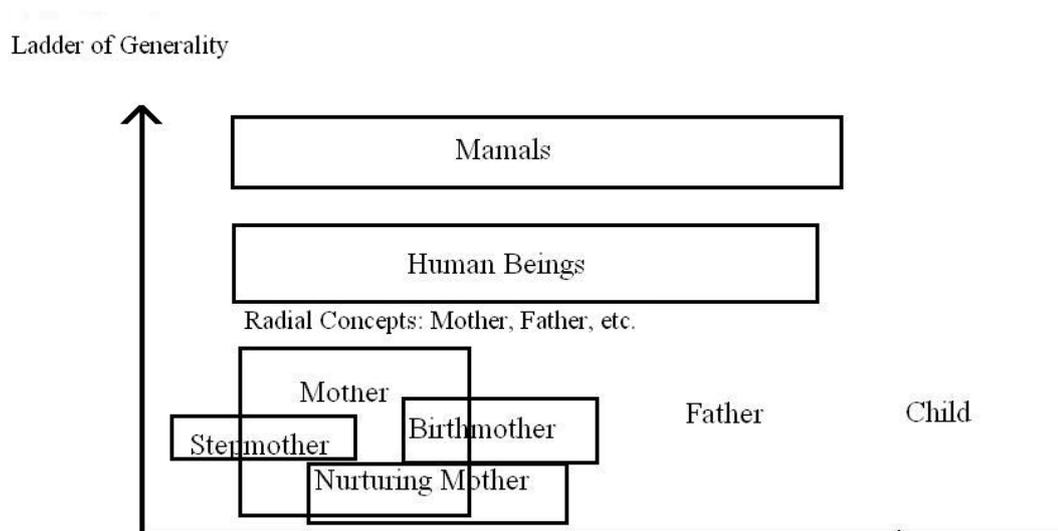
2.1 The radial structure of accountability

The conceptualization of accountability is further developed by Lindberg who argues that accountability, as a radial concept, can have different subtypes corresponding to the core concept (Lindberg 2009). However, as a first step, Lindberg identifies the five main attributes of the general concept of accountability (Lindberg 2009: 24). Firstly, the concept implies “an agent or institution who is to give an account”. Secondly, when we talk about accountability we have to specify what is the accountable agent supposed to be accountable for? This is referred to as the “domain” of accountability. Thirdly, any accountability relationships involve a second agent, the one that receives the accounts, the ones towards whom the agents mentioned in the first point are accountable. Fourth, is the answerability as it has been defined in the previous paragraphs. Finally, Lindberg mentions the right of those who exercise accountability to sanction those who are held accountable if the latter do not respond to inquires concerning their domain of activity. These specifications about the composing elements of accountability are very important for understanding the process and mechanism of accountability.

There is, however, another important argument made by Lindberg, that in a classical ordering on a ladder of abstraction, accountability relates to a more general concept of “constraint on power” (Lindberg 2009: 20). This, of course, does not mean that accountability itself cannot be a radial concept. The argument is rather that accountability is a more general concept (though not as general as “power constraint”) that allows for subtypes of

accountability such as “political accountability”, “societal accountability”, “fiscal accountability” and so on. Figure 1 is an example using the radial concept “mother”, which shows the relationship between the ladder of generality and radial concepts. In this figure the concept “mamal” is on the highest level of abstraction. It includes “human beings”, but it can also refer to “animals”. “Human beings” is on an intermediary level of abstraction and it includes concepts such as “mother”, “father” and so on. The concepts on the lowest level of abstraction in this figure can only assume radial categories that show the attributes the concept can have.

Figure 1. Radial Concepts and Ladder of Generality (Source: Lindberg 2009).



In the same way, Figure 2 shows how the concept of accountability is lower on the ladder of abstraction than “democracy” or “power constraints”. “Democracy” is a classical concept which can assume as many attributes as one wants to add. It is important however, that these attributes correspond to real world situation, otherwise the definition of democracy will become redundant. In the definition given by Schmitter and Karl (1991), democracy is the concept situated higher on the level of abstraction while accountability is one of the attributes of democracy.

Figure 2. The radial concept of accountability and the ladder of generality.

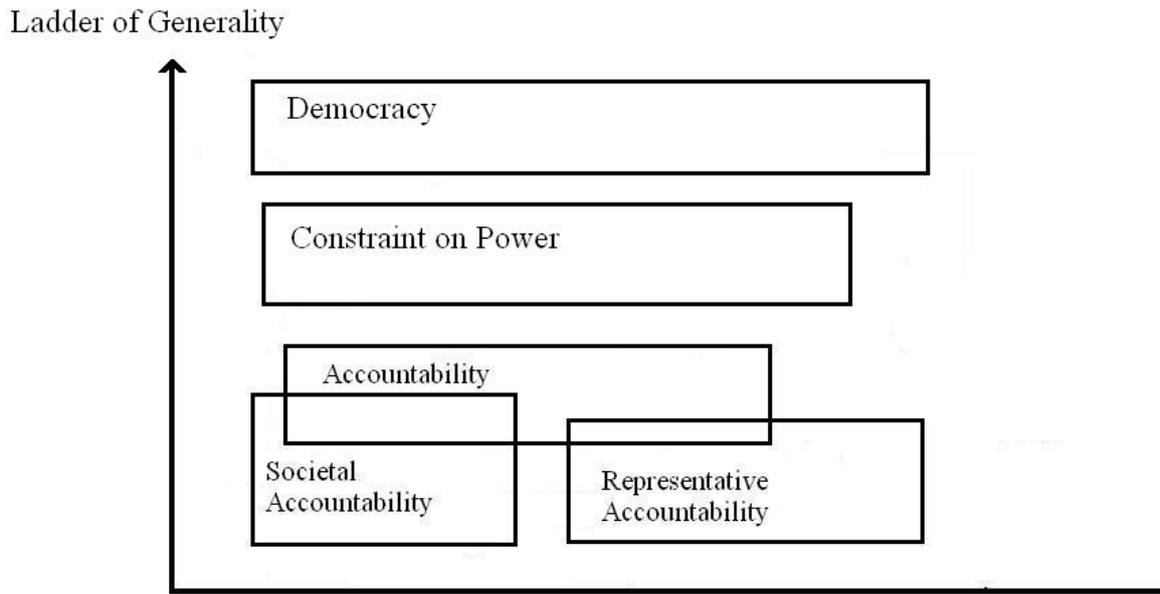


Table 1 shows the concept of “democracy” according to the ladder of abstraction model, as an example of classical conceptualization. When conceptualized according to the ladder of abstraction model, “democracy” has a common underlying dimension at all the

Table 1. The concept of “democracy” according to the ladder of abstraction model (source: Stângă 2008).

| Level of Abstraction | Democracy | Number of Objects |
|--|--|-------------------|
| Highest abstraction (Highest extension/Lowest intension) | Elections (all democracies in the world) | 120 countries |
| High intermediate abstraction | Elections + A | 100 countries |
| Medium abstraction | Elections + A + B | 80 countries |
| Lower intermediate abstraction | Elections + A + B + C | 60 countries |
| Lower intermediate abstraction | Elections + A + B + C + D | 40 countries |
| Lowest abstraction (Lowest extension/Highest intension) | Elections + A + B + C + D + E | 20 countries |

levels of generality: (free and fair) elections. In other words, the minimal condition for any political regime to be called a democracy is “free and fair election”. Besides elections, A, B, C, D and E are “theoretically relevant elements that improve the quality of democracy” (Stângă 2008: 14). These can be additional attributes such as political participation, accountability, economic growth, etc. Depending on how many of these additional elements are fulfilled, the concept of “democracy” is higher or lower on the level of abstraction. Closely related are the number of cases (countries) that go up and down on the ladder of abstraction. In other words, if democracy means elections only, then (according to the examples in the table) there are 120 democracies in the world. If democracy means elections + A, there are 100 countries that fulfill this criteria.

This example above emphasizes the difference between a classical concept (“democracy”) and a radial concept (“accountability”). Classical concepts with multiple dimensions (such as democracy) have a common underlying dimension as mentioned in the previous paragraph. For example, without free and fair elections, we cannot speak about democracy, even if other dimensions are empirically present.

With radial concepts (such as accountability) we have “a full instance of the concept even when some of its dimensions or sub-dimensions are missing” (Stângă 2008: 14). That is to say, accountability can be empirically observed even when the “punishment” dimension is missing, but “answerability” is present. The lack of both dimensions, however, also means the lack of any form of accountability.

Based on three analytical dimensions of accountability (the source, the degree of control and the spatial direction), Lindberg proposes a typology of accountability that contains twelve categories⁶. While I believe some types of accountability (for example

⁶ The 12 types of accountability according to Lindberg are: business accountability, bureaucratic accountability, audit accountability, client-patron accountability, patron-client accountability, professional/peer accountability, representational accountability, fiscal accountability, legal accountability, political accountability, societal accountability and reputational accountability (Lindberg 2009: 30-6).

business accountability or peer/professional accountability) pertain to other aspects of social relationships than pure politics, of particular interest for this thesis are what Lindberg calls “representational accountability” and “societal accountability”.

Representational accountability refers to the vertical relationship between citizens and their representatives and has a high degree of control (Lindberg 2009: 33). The author mostly refers to the electoral mechanism of accountability in this case, but also mentions “calls, meetings, demonstrations, letters, emails, writing in newspapers and mobilization of community and action-groups” as other means of accountability (Lindberg 2009: 33). Moreover, he argues that these alternative mechanisms of accountability can actually be “more effective” than voting (Lindberg 2009: 33).

In exercising societal accountability, the press and civil society have the main role in holding bureaucrats accountable (Lindberg 2009: 35). The degree of control applied by these entities is lower and therefore accountability through press and civil society organizations is weaker (Lindberg 2009:35).

There are two aspects that can be objected against Lindberg’s conceptualizations of representational and societal accountability, respectively, when we refer to liberal democracies. In the first case, ordinary citizens can also hold non-elected officials accountable for their decisions, by initiating legal complaints. Of course, non-elected officials do not have the same representative role as the elected ones, but Lindberg’s societal accountability seems to exclude ordinary citizens from holding bureaucrats accountable. The second point is that actually the press and civil society organizations might have a higher impact on the behavior of both non-elected and elected officials, even higher than horizontal agents of accountability. Politicians and bureaucrats alike are strongly aware of the power that the media can have in a democratic regime.

On the one hand, the debates on accountability have proved useful for emphasizing the importance of the concept for the broader theories on democratization and democracy. On the other hand, the adjectives that were attached to the concept prevented it from being used in empirical research due to its multiple meanings (Stîngă 2008: 10).

In “Political Accountability as a Radial Concept”, Stîngă develops a model of accountability that does not fit the classical “ladder of abstraction” model of conceptualization (see, Sartori 1970), but follows the model of “radial categories” (Collier and Mahon 1993). Building on Schedler’s conceptualization, Stîngă develops the initial two dimensions of accountability. Firstly, *answerability* means that citizens are entitled to demand information and bureaucrats or politicians are obliged to provide that information⁷ prospectively or retrospectively (that is before or after the process of decision making). Citizens are also entitled to demand explanations and those held accountable are obliged to provide explanations prospectively and retrospectively. Secondly, accountability means that those held accountable can be *punished* for their misbehavior. Punishment can come through “legally ascribed” mechanisms and “not legally ascribed” mechanisms (Stîngă 2008). In the first case, accountability takes place through “prosecution as outcome of legal investigation” or through the control of the Legislative over the Executive. In the second case, citizens exercise accountability through elections or by “demanding the activation of agents that impose punishment of legal nature” (Stîngă 2008: 12).

Therefore, accountability does not have an underlying dimension that would allow for the “ladder of abstraction” model. In examples (or instances) of accountability we can find some elements of the concept while others are missing. From the normative point of view, the more these conditions of accountability are met, the higher the level of accountability will be. This conceptualization of accountability avoids what Stîngă calls the conceptual stretching of

⁷ In the limits of the legal framework.

accountability by adding labels such as “vertical”, “horizontal” or “electoral” (Stîngă 2008: 2). Therefore, the definition of accountability that I will use in this paper is the following:

“Accountability represents the use of legal, societal and/or political resources for demanding information and explanation (both prospectively and retrospectively) from the elected and/or non-elected State officials, for the purpose of punishing the incumbents through legal or non-legal sanctions. When using non-legal sanctions, accountability implies also the capacity and willingness to demand the activation of agents of accountability who can impose punishment of legal nature” (Stîngă 2008: 19).

The scope of this paper includes the accountability relationships established between citizens, civil society and state officials. This excludes the second part of the definition of accountability, that is, the “punishment” of state officials, by voting, sanctioning or removing them from office. The paper rather focuses on the first part which refers to citizens or civil society demanding and receiving information and explanation from elected or non-elected State officials. Therefore, it excludes elections as a means of vertical accountability, but also the mechanisms of horizontal accountability.

2.2. The Agents of Accountability

The question that remains unanswered is “to whom are politicians accountable?” I believe that from the literature exposed so far and the above definition of accountability, “elected or non-elected State officials” are ultimately accountable to citizens. It can be argued that if we take into consideration O’Donnell’s “horizontal accountability”, state officials are not only directly accountable to citizens, but also to autonomous state institutions. But the role of these autonomous state institutions (basically law-enforcing institutions that are part

of the “punishment” dimension of accountability) is to exert accountability in the name of the citizens. The definition of accountability given by Stîngă, the literature on democratization and the theoretical considerations exposed in this subchapter, emphasize that State officials should be accountable to citizens. Indirectly, “horizontal” or “oblique” accountability mechanisms only serve this ultimate purpose.

The idea that citizens should be the ultimate holders of political power has marked political life since the times of the Athenian democracy. Even though the ancient Greek democracy cannot be compared to the current standards of democracy, it provided the basic principle of the sovereignty of the people (Gordon 1999: 29). In another instance, John Ferejohn’s analysis on accountability argues that we can distinguish two approaches on accountability based on two important models: the agency model and the institutional model (Ferejohn 1999: 133-36). The first approach focuses on the role of citizens and their representatives as the main agents of interaction in the process of policy making. Secondly, the institutional approach emphasizes the sovereignty of the People as stated in the Constitution: “the Constitution was created by the people acting in its sovereign capacity [...] The people constituted a national government and directly delegated some of its powers to it, but subjected the exercise of governmental power to continuing direct and indirect supervision” (Ferejohn 1999: 135).

The development of the nation states and the increased number of citizens that had to be represented required the adaptation of this principle. The idea of representative democracy became fundamental, but it also challenged the means of accountability. Paul Hirst argues that many assumptions regarding representative democracy are flawed and they don’t actually overlap with the reality of politics (Hirst 1990: 25). Firstly, he argues that the fact that citizens elect their representatives does not mean that they also select policies that are crafted by legal means. Secondly, the elected representatives do not craft laws that are to the

benefit of the entire constituency, moreover, the executive, non-elected, power is often the one that initiates laws. Finally, universal representation is basically impossible due to institutional structures (such as electoral systems) that impede universal representation (Hirst 1990: 25-7).

While Hirst's solution is straightforward – exploiting the virtues of corporatism and bringing civil society closer to the political society – it is hardly a solution that will reduce the distance between citizens and politics. Sticking to the more realist approach, I believe that developing the mechanisms of political accountability can be an alternative solution to this problem.

From another perspective, Whitehead warns that too much accountability might actually damage the fabric of democracy because it would enhance the idea of strong leadership able to respond to public demands (Whitehead 2002: 98). In other words, a strong leadership that benefits from extensive popular support⁸ might lead towards more authoritative governments. However, while he is quite critical towards the “semi-mystical theory of ‘the sovereignty of the people’ in a democratic system”, he argues that without such a theory, “democracy, and democratization both dissolve away into a succession of instrumental transactions lacking any necessary connection or moral claim to allegiance” (Whitehead 2002: 94).

In their article on “societal accountability” in Latin America, Smulovitz and Peruzotti (2000) argue that civil society organizations (through the voice of their members) have been neglected as agents of accountability. The examples they bring mainly refer to public contestation (through protests or other means) of different policies adopted by government officials (Smulovitz and Peruzotti 2000: 151-52) that in turn triggers mechanisms of horizontal accountability. I believe that there is one positive and one negative aspect of their

⁸ A large popular support as a result of the high responsiveness of the government.

argument. The problem is that the concept of “societal accountability” and its meaning to cover the particular events that they refer to, runs into the danger of conceptual stretching as mentioned in the previous chapter (Stângă 2008: 7). On the other hand, they point out that the role of the citizens and the civil society in exercising accountability also needs to be taken into consideration.

As this thesis focuses on the “answerability” dimension of accountability, it is important to state how exactly citizens and civil society hold officials accountable by demanding information and explanation. Firstly, there is an informal way that can be used by citizens to forward their demands and require answers from their representatives. This can be done by direct contact (through letters or emails) as most politicians make their contact information available on the websites of their institution. Furthermore, MPs have office hours when they can meet their electors. Secondly, it should be mentioned that the legal frameworks in most European democracies enhance this direct communication between citizens or civil society and state officials. The so-called Freedom of Information Acts allow citizens to ask for information about the actual way public funds are spent or the agenda of their representatives. Some of this information is made public without request, but not all the time and especially not in countries that have only recently become democracies.

Of course, other factors can interfere in the process of accountability that are not being considered in this paper. For example, the relations between different state institutions, which concerns issues of horizontal accountability. While these factors are also important, they go beyond the scope of this paper.

This chapter aimed to answer two essential questions for this research: (1) what is accountability and (2) who are the agents of accountability or whom is accountable to whom? Firstly I provided a definition of accountability and I emphasized the complex structure of

this concept. I supported the argument that accountability is a radial concept that has twelve subtypes out of which representative accountability and societal accountability are the most important.

As a second goal, I argued that the importance of these two subtypes of accountability stems from the theories of political representation. Representative democracy implies the sovereignty of the people and their right to control the use of power which they delegate to their representatives. However, it is not only the duty of the elected representatives to act in the interest of the citizens, but it is also the duty of non-elected representatives to do so.

Therefore, mechanisms of societal and representative accountability are extended over both elected and non-elected state officials. The empirical analysis will follow this line of argumentation as it sets out to compare the indicators of accountability across the four countries included in this study.

CHAPTER 2: RESEARCH METHODOLOGY

In both Western and Eastern democracies, there are formal rules that enhance accountability⁹, however, the willingness of the citizens to exercise accountability, through other means than elections, is unclear. In addition it could be mentioned that bureaucrats and politicians themselves do not abide by the rules of horizontal accountability while the ordinary citizens do not seek to correct for these problems.

The comparative method that I will use implies two analytical steps: a qualitative content analysis of the freedom of information acts in France, Great Britain, Hungary and Romania; and a quantitative descriptive analysis of how often citizens use accountability mechanisms. The level of analysis in both cases is the country level, while the level of observation is the individual level in the first analysis and the institutional level in the content analysis. In other words, inferences will be made from the observations on citizens and the laws of access to public information.

There are two criteria that I took into account for each of these analyses. Firstly, the content analysis will be performed on the laws of access to public information in each of the cases that I am considering. Here, I have two evaluation criteria that I will use: (1) how clear is the law regarding the way information can be obtained; and (2) how detailed is the law about what kind of information is accessible or not to the public.

The actual data that will be used are the “Freedom of Information Act” (UK), “Law 544/2001 Regarding the Free Access to Public Information” (Romania), “Act of Protection of Data and Public Access to Data of Public Interest” (Hungary), “Law No. 78-753 of July 17th, 1978” (France). The French law that will be referred to in this paper is not specifically designed as a law of access to public information. The purpose of the law (as stated by its

⁹ Like the laws that regulate the access to public information.

title) is to “improve the relations between the citizens and the public administration”. However, chapters II, III and IV specifically refer to the right of citizens to consult documents of public administration institutions. Therefore, I chose this law as being the closest to a law of access to public information. The French Constitution, through the “Declaration of Rights of Man and the Citizen” also contains basic principles regarding the relations between the citizens and the state officials.

Secondly, in order to assess the willingness of citizens to hold politicians accountable the quantitative analysis will focus on two issues. Firstly, accountability is a process that involves direct communication between the accountants and those who are held accountable. As I emphasized in the previous chapters, political accountability mainly refers to the relation between the state and the citizens or civil society organizations who demand “information and explanation from the elected and/or non-elected State officials” (Stângă 2008: 19). Therefore, I look at the frequency of contacts between politicians and citizens, but also at citizen’s participation in public demonstrations. The data that I will use for this analysis will be collected from the European Social Survey, Round III (2006/2007). The survey contains two specific questions in this sense: the number of times that citizens have “contacted a politician or a government official in the past 12 months” and the number of times the same citizens have “taken part in lawful public demonstrations”. There are two statistical measures that I use. Firstly, frequencies will describe the distribution of the responses given by the citizens in each country. This first step will give the reader an idea of the relationship between politicians and government officials on one side and citizens, on the other side. Secondly, an ANOVA test will compare the means of the two dichotomous variables that I am using. This second step of the quantitative analysis provides the basis for the comparisons of societal and representative accountabilities across cases. The purpose of this analysis is to quantitatively assess the mechanisms of “representational” and “societal accountability”

(Lindberg 2009, Smulovitz and Peruzzotti 2000). The ANOVA test measures the significance of the differences between the sample groups from each country. In other words, if people in France are more willing to contact politicians than people in Romania, the ANOVA test shows if this difference between countries is significant or not.

As far as the indicator used in my first analysis is concerned, there is indeed a great difference between contacting officials as a form of political participation and contacting officials as a form of political accountability. On the one hand, Sidney Verba argues that political participation can be narrowed down to a series of indicators such as voting, protesting or writing letters to government officials (Verba 1996: 1). On the other hand, contacting government officials can be an indicator for accountability, if citizens request information or explanation about political decisions. Lindberg, for example argues that “several forms of participation are available to citizens for the purposes of requiring information and holding elected leaders accountable” such as “calls, meetings, demonstrations, letters, emails, writing in newspapers” (Lindberg 2009: 33).

Contacting government officials also covers the process of contacting governmental institutions for requesting publicly available information. The survey question in the ESS samples mentioned above does not address the reason behind citizens contacting government officials (that is, it does not necessarily ask whether they contact officials for holding them accountable). However, it is assumed that by contacting government officials, citizens can exercise accountability either retrospectively or prospectively.

There is a direct and strong connection between political accountability and the access to public information. The legal frameworks clearly specify what kind of information can citizens request from public institutions regarding their employees’ background, activities and decisions. Generally, the laws of access to public information restrict some information

that is held by institutions that concern national security. These laws also specify the sanctions that can be applied to those responsible with providing information of public interest, in case that information is not provided. Therefore, I believe that the laws of access to public information are a good indicator of how open state institutions are towards accountability.

CHAPTER 3: AN EMPIRICAL ANALYSIS OF ACCOUNTABILITY

How exactly do citizens and civil society organizations hold state officials accountable? Demanding information and explanation with regard to public decisions is regulated through laws that specify the proceedings that have to be followed in order to obtain that information. The driving principle behind the freedom of information acts is that citizens have the right to be informed about the political decisions or the process of decision making, that concern them.

This chapter focuses on the indicators of accountability in two Eastern and two Western European countries. Firstly, I look at the legal frameworks that establish the rules of holding state institutions (and implicitly state officials) accountable through requesting information and explanation. The purpose of this first step is to observe if these rules are different from one country to another and whether the differences enhance or restrict accountability. Secondly, I set out to observe whether citizens in Western Europe are more willing to use accountability mechanisms (such as contacting government officials or public protests) than citizens in Eastern Europe.

3.1. The Freedom of Information Acts

The first thing that should be mentioned is that the laws of free access to public information are particularly recent even in old democracies. In the UK such a law was only adopted in 2000. In France, the law was adopted in 1978, however, some provisions have not been clarified until recently¹⁰. In Hungary and Romania freedom of information legislation has been adopted in 1992 and 2001, respectively. The “recentness” of these laws indicates

¹⁰ For example, the time frame in which a public information request has to receive a response has only been specified through a Governmental Decree, in 2005.

that governments were not particularly keen to open up to public scrutiny, regardless of the democratic or non-democratic regimes in the four countries.

The legal frameworks concerning the access to public information in France, Hungary, Romania and UK contain introductory statements that follow the normative principles exposed in the theoretical chapter of this paper. The Romanian law emphasizes from the very beginning that “free and unbounded access of persons to any information of public interest, as defined by the present law, is one of the fundamental principles regarding the relation between citizens and public authorities.” (Chapter 1, Art. 1). The British law clearly establishes the right of any person who requests public information to be informed by the public authority whether it holds that information and, if so, to provide it (Part I, Section 1). In Hungary, the law of access to public information specifies that its function is to “guarantee the right of everyone to exercise control over his or her personal data and to have access to data of public interest, except as otherwise provided by a rule of law under this Act” (Chapter 1, Art. 1). The French law regarding the relation between citizens and public authorities guarantees the free access of any person to “administrative documents” of the public authorities (Title I, Chapter I, Art. 1). Despite the strong support of all these laws for the free access to public information, there are certain differences concerning the following questions: What is exactly the public information that is available to citizens? What kind of information is not made available to the public? How easily can citizens obtain the available information?

One of the first differences that emerge between these legal frameworks, in Hungary, France, Romania and UK is the existence of an independent governmental body to oversee the implementation of the law of access to public information. Among the four countries, Romania is the only one that does not have such a public authority. In Hungary, the Data Protection Commissioner has a double role: firstly his duty is to receive complaints from any

person whose private information has been used abusively by public or private entities; secondly (and more important) the Data Protection Commissioner receives complaints if authorities illegally refuse to disclose information of public interest (Hungarian Parliamentary Commissioner for Data Protection and Freedom of Information website). In the United Kingdom, Part III of the Freedom of Information Act states that the role of the Information Commissioner is to supervise the enactment of the law mentioned above. Part IV also mentions that the Commissioner can receive complaints from anyone who is not satisfied with the way public authorities dealt with a request for public information. In France, The Commission for Access to Administrative Documents plays the same role of enhancing the compliance with the law of access to public information. “La commission d’accès aux documents administratifs” (The Commission of Access to Administrative Documents) receives complaints from citizens who have not received a positive response to their request for public information. In Romania, if a government institution refuses to provide the requested public information, the petitioner can only go to court against such a refusal. However, even in the three countries where there are supervising bodies, the Commissioner can only give recommendations to public authorities. The Commissioners cannot impose a decision regarding the disclosure of public information. The ultimate decision, therefore, belongs to the court of law.

As far as political accountability is concerned it is important to observe what kind of information can citizens or civil society organizations demand. And, of course, what kind of information is not available on the basis of freedom of information acts. In all the four countries, public information as defined by law, refers to any kind of information held by public authorities. Unlike the Romanian law, however, the Hungarian, British and French laws also designate as public information, information held by any person or company

providing public services (Chapter III, Art. 19, in the Law LXIII; Section 5, in Freedom of Information Act 2000; Title I, Chapter 1, Art. 1 in Law No. 78-753).

There are two major types of information that are generally restricted from the public: information that refers to personal data and information that cannot be disclosed due to the threat it poses to public security. In the Hungarian and Romanian laws, personal information can become public information if it refers to persons that hold a public authority position (Chapter III, Art. 19, in the Hungarian Law and Chapter II, Section I, Art. 14, in the Romanian Law). The British law protects personal information through the Data Protection Act of 1998, but it allows the disclosure of personal data on the same principle as the Hungarian and Romanian laws (see Part II, section 40 of the Freedom of Information Act in the UK). The French law also prohibits the disclosure of information that prejudices the privacy or makes moral judgements regarding a certain person (Chapter I, Art. 6).

Concerning public data that cannot be disclosed the laws of public information in all the four countries mention the following: documents that are related to national defense and security, data concerning judicial investigations, classified information about foreign relations and economic policies and information that can harm private economic interests. Thus, it can be observed that in all four countries, the scope of the information about public authorities that is available to citizens is relatively generous, as the laws are balanced between disclosing public information and protecting personal data.

There are two other aspects of the four laws that are worth focusing upon. Firstly, there are significant differences between how often citizens can file requests for information to public authorities. Surprisingly, the French and the British law impose certain restrictions from this point of view. The French law mentions that “the administration is not obliged to respond to abusive requests, particularly concerning their number, their repetitive or systematic character” (Title I, Ch. 1, Art. 2). In the British “Freedom of Information Act” it is

mentioned that the public authority does not have to consider a “vexatious” request or two similar requests made by the same person during a short interval of time (Part I, Section 14). The Hungarian and the Romanian laws do not impose any restrictions towards repeated requests of information. Whether this is a positive or negative aspect of the law it is uncertain. On the one hand, it makes sense not to impose an obligation to respond to two identical requests for information. On the other hand, the French provision regarding the number of requests leaves space for restrictions to disclosures of public information.

Secondly, according to all the four laws of access to public information, the authorities may impose a fee for processing the data requested by an applicant (Title I, Ch. 1, Art. 4 in Law No. 78-753; Ch. 3, Art. 20 in Act LXIII; Ch. II, Art. 9 in Law 544/2001; Section 9 in freedom of Information Act). This provision can also have adverse effects towards the free access to information because a higher volume of information can become prohibitively costly to regular citizens. Moreover, authorities can invoke high fees as a means to restrain the disclosure of information, as it will become clear in the Romanian case described below.

Another question can be raised concerning the disclosure of information: how long does it take to obtain the public information one is interested about? In Hungary, Romania and UK the laws of access to public information specify that a request for disclosure of public information has to receive a response in 15, 10 to 30 and 20 days, respectively. In France, a public information request is considered rejected if the claimant does not receive an answer within a month (Decree no. 2005-1755 Art. 17/Dec. 30, 2005). After this time the claimant can appeal to the Commissioner for a decision that is communicated to the public authority that holds the information. If the information is not disclosed within two months from the initial request, the claim is considered to be rejected.

There are not great differences between the four countries, concerning the legal provisions that support accountability. However, the British law is much more detailed regarding the definitions of public institutions and the nature of public information that is available to citizens. The Hungarian, French and the Romanian laws contain less details in this respect. Furthermore, it cannot be argued that in Western Europe the laws of access to public information enhance accountability more than in Eastern Europe. The access to public information is open to any person or organization, in all the four countries. This shows that, institutionally, accountability can be exercised just as much in the East as in the West.

3.1.1 Cases of infringement

Even though the laws of access to public information are fairly concise about the obligation of the officialities to provide public data, the public authorities do not always abide by the law. The number of cases in which the requests are ignored or left without response is impossible to account, as there is no centralized data on this issue. However, there are reports and accounts made by non-governmental organizations and civil society associations that constantly evaluate the implementation of freedom of information acts.

In the following lines I will present a few cases in which the laws of access to public information have not been respected by public officials. Moreover, the examples show that either state authorities were unaware of the basic provisions of these laws or that they were not willing to abide by law. The refusal to disclose public information is often due to the fact that state officials would provide evidence of their own misconduct.

In January 2008 the Romanian Institute for Public Policies (IPP) conducted a research project that aimed to measure the decisional transparency of the public authorities in Romania (IPP Report 2008). One part of the research methodology however, was aimed at measuring the accountability of the public authorities based on the provisions of “Law no.

544/2001 Regarding the Free Access to Public Information”. The IPP sent public information requests to 23 city town halls, 36 municipality town halls, all over the country, and the 6 town halls of Bucharest. The IPP requested from each public authority 11 documents¹¹ that can be disclosed on the basis of the law of access to public information. Out of 23 city town halls, only 3 have provided the requested information in time, as described by the law, while four other public authorities have provided the information after the legal deadline. After being called to court 13 other town halls have provided the requested information. Out of 36 municipality town halls, 6 have also been called to court for not responding to the claim. In this case, the authorities have also provided the information only after legal action has been taken against them (IPP Report 2008, 25). Finally, two other authorities have been called to court for requesting excessively high fees for providing the information that was requested by the IPP (IPP Report 2008, 26-28). The conclusions of this report show that public authorities in Romania are generally unaccustomed to the provisions of the law of access to public information. The town halls that were the subject of the research made by the IPP, failed to respond promptly to the requests or have tried to obtain additional funds to their budget by imposing higher than normal fees for processing the demanded information.

In Hungary, an example of infringement of access to public information concerned the Hungarian Helsinki Committee and the Budapest Central Police Department and the 16 District Police Departments of Budapest. On June 10 2008, the Committee requested information concerning the total number of criminal cases the Police Department had in 2007, how many times was free legal aid provided and the names of the lawyers that provided the legal aid. The Central Police Department and six other District Departments have refused to provide the information, while the other Police Departments have either

¹¹ The requested information mainly referred to the following: copies of the annual reports concerning the application of the “Law 544/2001 Regarding the Free Access to Public Information”; copies of the minutes of the Local Council meetings; the way in which the Local Council meeting debates and decisions are made public; and the legal cases and sanctions applied to public officials for not respecting the “Law 544/2001 Regarding the Free Access to Public Information” (IPP Report 2008, 11-12).

provided the information or plainly ignored the claims (Hungarian Helsinki Committee, 2008). The Committee filed a lawsuit against the refusal of the Police Departments and obtained a favorable decision on January 8, 2009.

The Campaign for Freedom of Information¹² is a leading non-governmental organization in the UK that accounts on infringements of the freedom of information. As indicated on the organization's web site, it was established in 1984 and was involved in the establishment of the Freedom of Information Act. In 2008, The Campaign has released a report that contained more than 1000 press articles¹³ that were based on information being released under the Freedom of Information Act (Campaign for Freedom of Information 2008). The purpose of the report was to emphasize the major benefits of the Freedom of Information Act, which allowed the disclosure of public information involving a large number of public authorities¹⁴.

One of the most interesting cases was the attempt of the British MP's, in January 2009, to change the Freedom of Information Act in such a way that documents accounting for the expenses of the MP's could not be disclosed¹⁵. However, based on the provisions of the Freedom of Information Act (Section 7(3)(a)) the Secretary of State of Justice has decided that this information can be made public (UK Secretary of State, Order No. 1967/2008).

As instruments of political accountability, the laws concerning the free access to public information are essential to holding state officials accountable for their decisions. The provisions and the character of the laws do not differ significantly from one country to another. The laws analysed in this section are clearly responding to a couple of relevant

¹² Their website can be found at <http://www.cfoi.org.uk>. (accessed May 21, 2009).

¹³ The articles were collected from "national and regional papers in England, Scotland, Wales and Northern Ireland during 2006 and 2007" (The Campaign for Freedom of Information, 2008).

¹⁴ The description of the report states that "these disclosures throw new light on the government's approach to many issues, identify shortcomings in public service delivery, highlight other problems which have not been addressed and show where policies have succeeded. They reveal the substantial contribution to accountability made by the FOI Act" (Campaign for Freedom of Information, 2008).

¹⁵ See the BBC "Q&A: MP's expenses 'secrecy' row" available at http://news.bbc.co.uk/2/hi/uk_news/politics/7839281.stm, (accessed May 21, 2009).

questions regarding accountability mechanisms: what are the information that the citizens can obtain about public authorities and how can information be obtained?

Firstly, the differences between the laws are at the level of details regarding the definitions of “public information”. In the cases of France, UK and Hungary the laws also define as public information the documents held by the non-state entities that provide public service on the basis of public contracts. The Romanian law does not extend the definition of public authority to such a degree and therefore documents accounting for the expenditure of public funds by private entities are unavailable. In this respect, the clarity of the laws in relation to the accountability process is higher in the first three cases and lower in the case of Romania.

Secondly, all the four institutional frameworks are clear about the how information can be obtained. Any request in writing, containing the identification contacts of the applicant and the description of the desired information should be addressed in the time frame specified by the law.

Even though the institutional frameworks enhance political accountability, the cases of infringement show that government officials seek to escape public scrutiny in both Western and Eastern Europe. The “desire to be as unconstrained as possible is a constant fact of politics” (Elster 1988, 4). The final part of this chapter emphasized that even with clear legal provisions, the free access to public information can be obstructed by public authorities.

If public authorities try to obstruct the free access to public information, they also impede requesting information and explanation for their actions, as mechanisms of accountability. From this point of view the differences between East and West are not significant, as examples show that cases of infringement happen in both parts of Europe. However, it should be noted that cases of infringement on freedom of information are not necessarily a widespread phenomena. It cannot be argued from a few examples that the

Freedom of Information Acts are not properly enforced in the four countries of this study. What can be argued is that even though there are legally binding rules on how people can exercise accountability, the rules are not always respected. This situation is valid for Eastern and Western Europe alike. Therefore, the levels of accountability as far as the access to information and explanation is concerned, are not different across the four countries.

Given the fact that institutional frameworks allow and even enhance accountability, the next part of this paper focuses on the willingness of the citizens to hold politicians accountable. In order to assess the differences between countries concerning this matter I will next focus on a couple of theoretically relevant indicators: the contacts between citizens and politicians and citizens' participation in public protests.

3.2. A Comparison of Societal and Representative Accountability

This part of the empirical analysis will approach the concept of accountability in Eastern and Western Europe, from the individual level. In other words, if accountability implies requesting information and explanation, the frequency of contacts between citizens and government officials should be a good proximate indicator for representative accountability. Moreover, citizens can exercise accountability through public protests. Demonstrations can activate legal mechanisms of accountability involving state institutions. Therefore, as a second proximate indicator for societal accountability I will focus on the participation in public protests between the France, Hungary, Romania and Great Britain.

Two fundamental questions concerning the accountability relationships that are established between citizens and rulers are: what are the alternative means of accountability other than elections and do citizens “use” these alternative means? The concepts of representative and societal accountability discussed in the previous chapters are central to this

question. However, before I proceed to the operationalization and measurement of these two concepts some clarifying aspects need to be mentioned.

Firstly, the radial form of the concept of accountability poses particular difficulties for its empirical analysis, however it does not make it impossible (Lindberg 2009: 38-42). The different subtypes of accountability need to be carefully separated and studied in order to come up with coherent conclusions. At the same time, it is important to mention that generalizations regarding accountability cannot be made from particular observations of subtypes of accountability, due to the radial structure of the concept (Lindberg: 2009: 40). For example, it cannot be claimed that higher fiscal accountability in a certain country than lower political accountability in another also means higher accountability, *per se*, in the former case than in the latter. Therefore, comparative assessments of accountability can only be made at the level of the subtypes.

Secondly, the relationship between societal or representative accountability and political participation becomes unclear as one seeks to find empirical indicators for these concepts. Indeed in some cases the indicators seem to overlap. However, theories that have contributed to the definitions of accountability have pointed towards such overlapping indicators as plausible for subtypes of accountability such as “societal” or “representative” (Lindberg 2009: 33, Smulovitz and Peruzzotti 2000). On the one hand, the reason why citizens would write letters to their representatives is to hold them accountable either retrospectively or prospectively. Retrospectively, citizens may question their representatives about their stand on certain issues or decisions that they have made; or citizens might communicate their wishes, views and requests for prospective decisions that politicians have to take. On the other hand, Lindberg (2009: 33), Smulovitz and Peruzzotti (2000) and Stângă (2008: 13) argue that public protests can also be a mechanism of accountability, where citizens can force state officials to comply to their requests.

For the purposes of the empirical analysis on societal and representative accountability in this chapter I use two indicators that are based on the theoretical frameworks exposed above: firstly, citizens can hold politicians or government officials accountable by contacting them through different means. Secondly, public protests are a strong mechanism of accountability, which in some instances can be more effective than electoral mechanisms.

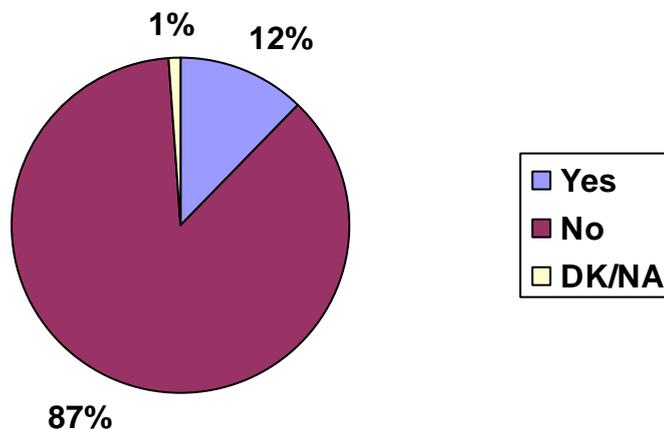
The data used in the quantitative descriptive analysis has been collected from the third round of the European Social Survey carried out in 2006. The survey was carried out on a number of 25 European countries. For this paper I have selected the four countries that are also the subject of the qualitative analysis. The sample sizes of the surveys counted 1500 respondents in Hungary, 1984 respondents in France, 2121 in Romania and 2392 in the UK. The numerical differences between the representative samples are due to differences between the populations of the countries in the survey. The two variables that are used in the analysis are have been constructed along the following questions: “there are different ways of trying to improve things in [country] or help prevent things from going wrong. During the last 12 months, have you contacted a politician, government or local government official?” and “During the last 12 months have you taken part in a lawful public demonstration?” The responses were coded as “1” for “yes” and “2” for “no”.

The causes behind the answers given by the respondents can be very different not only from one country to another, but also within countries. Therefore, the aim of the quantitative analysis in this paper is rather simple. In the following lines I will, firstly, show the distribution of the responses to the two questions by using basic frequencies. Secondly, through the ANOVA test, I compare the variation of the means and account for any significant differences (or the lack, thereof) between the cases. Below, I present a summary of the responses given by the citizens that participated in the survey. In some country

samples, missing cases have been deleted as they represented a very low percent in the samples (under 1%)¹⁶. Missing cases (refusal to answer or those who answered “do not know”) over 1% are reported in the figures below, even though compared to the valid cases they are rather insignificant.

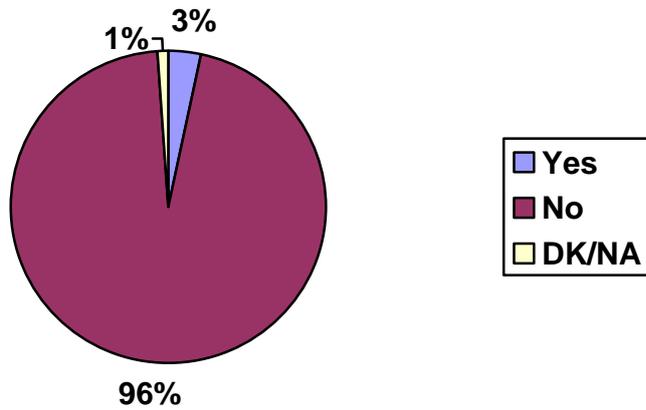
The first observation, on Hungary, shows that only 12% of the respondents have contacted a politician or government official, 86% gave a negative response to the question, while 1% did not know or refused to respond (Figure 2). As far as participation in public demonstrations is concerned, 3.2% have responded positively, 95.8% did not participate and 1% did not know or refused to respond (Figure 3).

Figure 3. Contacted Politician – Hungary (European Social Survey 2006).



¹⁶ In the French sample, there were 2 missing cases; Hungary – 18 missing cases; Romania – 18 missing cases; Great Britain – 2 missing cases.

Figure 4. Taken part in lawful public demonstration – Hungary.



In France, 15 percent of the respondents to the survey have contacted a politician or government official, while 85% have responded negatively to the question. One significant difference in France (compared to other countries) is that about 15% of the sample population have participated in lawful public demonstrations.

Figure 5. Contacted Politician – France (ESS 2006).

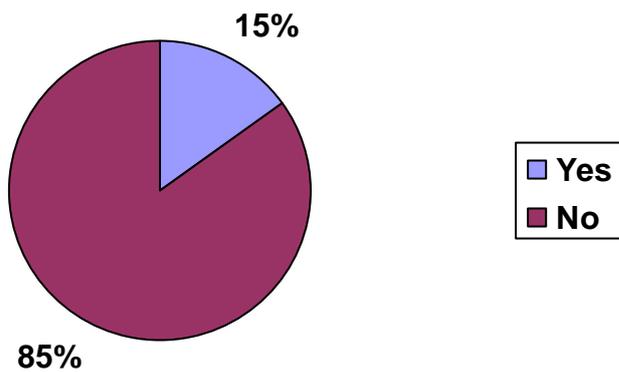
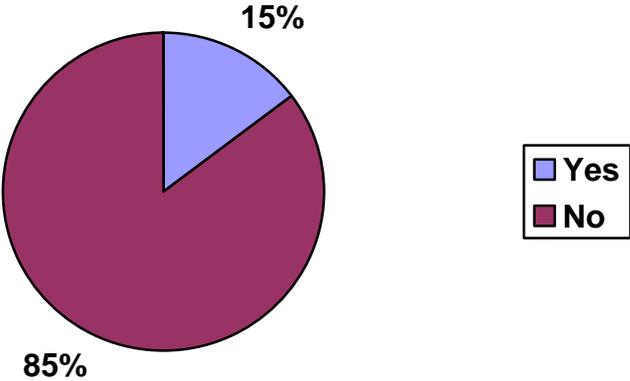


Figure 6. Taken part in lawful public demonstration – France (ESS 2006).



In the UK, the number of the sample population who contacted a politician or public official is slightly higher than in other countries. 17% have responded positively to the question “have you contacted a politician, government or local government official” in the last 12 months? The data also shows that only 4% of the respondents have taken part in public demonstrations.

Figure 7. Contacted Politician – Great Britain (ESS 2006).

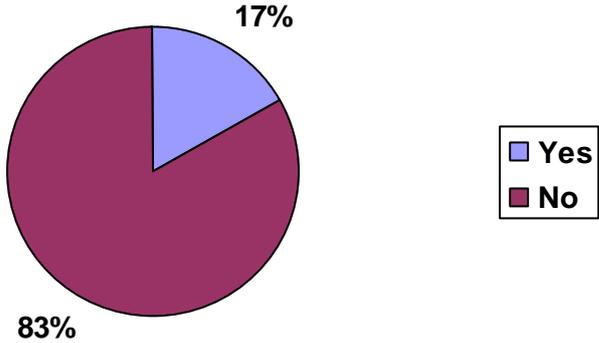
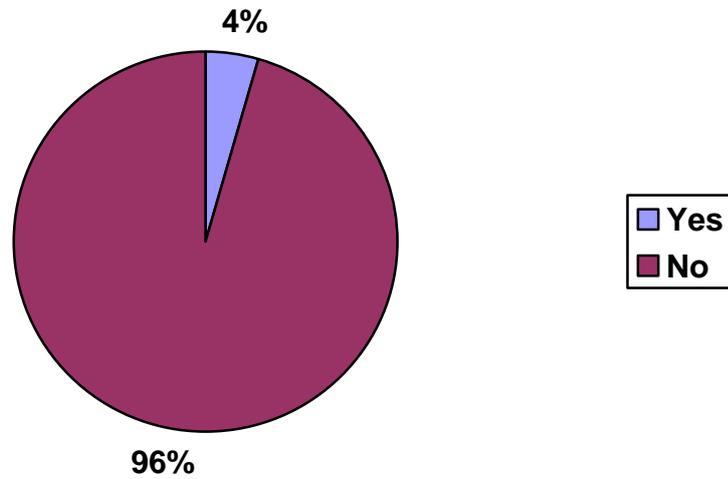


Figure 8. Taken part in lawful public demonstration – Great Britain (ESS 2006).



The Romanian case shows that 16% of the participants to the ESS survey have contacted a politician while 4% have participated in public demonstrations.

Figure 9. Contacted Politician – Romania (ESS 2006).

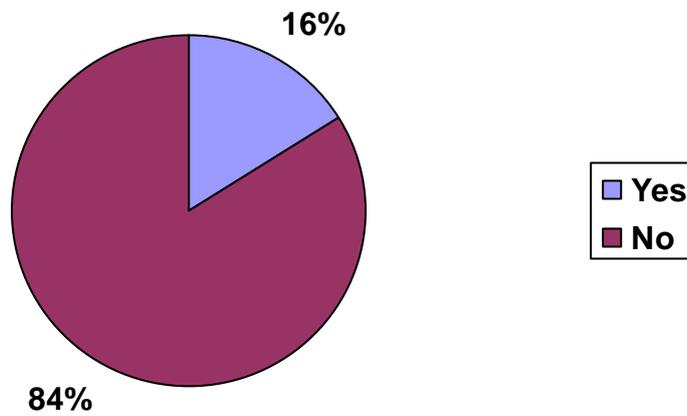
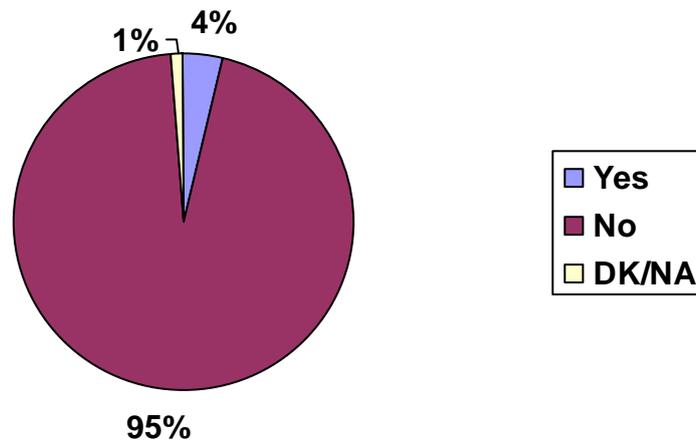


Figure 10. Taken part in lawful public demonstration – Romania (ESS 2006).



Even though the descriptive analysis of the data presented above gives the reader a broad idea about the differences between the countries, it is important to see if these differences are actually significant. The results of the ANOVA test performed separately on the two dichotomous variables are presented in the following lines.

First, by observing the means of the “contacted politician” variables, it becomes obvious that the frequency of contacting politicians in all the four countries was low. In the case of the dichotomous variables in this analysis a mean of 1.5 would indicate that the distribution between those who contacted a politician or government official and those who did not, is 50%-50%. Therefore, any value above 1.5 indicates that the responses were mostly negative, while values below 1.5 mean that responses are mainly positive. In the four countries of this analysis, the means for contacting a politician are 1.88 for Hungary, 1.85 for France, 1.84 for Romania and 1.83 for Great Britain. The standard errors in all cases is 0.008. The low standard error coefficients show that the samples are representative for the population.

Table 2. Descriptive Statistics for the ANOVA test (“contacted politician” variable).

| Country | Cases (N) | Mean | Standard Deviation | Standard Error |
|---------------|-----------|------|--------------------|----------------|
| France | 1984 | 1.85 | .358 | .008 |
| Romania | 2121 | 1.84 | .369 | .008 |
| Great Britain | 2392 | 1.83 | .377 | .008 |
| Hungary | 1500 | 1.88 | .328 | .008 |
| Total | 7997 | 1.84 | .362 | .004 |

The one-way ANOVA test results indicate that there are significant differences between the groups, with $p < .05$. However, in order to see between which groups exactly the differences are significant it is important to observe the comparison table.

Table 3. Mean differences between countries and their significance (“contacted politician” variable).

| (I) Country values | (J) Country values | Mean Difference (I-J) | Standard Error | Significance |
|--------------------|--------------------|-----------------------|----------------|--------------|
| France | Romania | .011 | .011 | .893 |
| | Great Britain | .021 | .011 | .312 |
| | Hungary | -.029 | .012 | .119 |
| Romania | France | -.011 | .011 | .893 |
| | Great Britain | .009 | .011 | .951 |
| | Hungary | -.040* | .012 | .007 |
| Great Britain | France | -.021 | .011 | .312 |
| | Romania | -.009 | .011 | .951 |
| | Hungary | -.049* | .012 | .001 |
| Hungary | France | .029 | .012 | .119 |
| | Romania | .040* | .012 | .007 |
| | Great Britain | .049* | .012 | .001 |

* The mean difference is significant at the .05 level.

Table 2 shows that overall the differences between groups are not strongly significant. There are four cases in which the differences regarding the responses given to whether or not citizens have contacted politicians is significant at the 0.05 level. The differences appear between Hungary and two other countries, respectively Great Britain and France. Between Hungary and Romania we can observe a 0.040 mean difference (0.012 standard error) with a significance coefficient of 0.007. As far as the relationship between Hungary and Great

Britain is concerned, the mean difference is 0.049 (0.012 standard error) and a significance coefficient of 0.001.

Table 4. Descriptive Statistics for the ANOVA test (“public demonstration” variable).

| Country | Cases (N) | Mean | Standard Deviation | Standard Error |
|---------------|-----------|------|--------------------|----------------|
| France | 1986 | 1.85 | .355 | .008 |
| Romania | 2118 | 1.96 | .192 | .004 |
| Great Britain | 2394 | 1.96 | .205 | .004 |
| Hungary | 1503 | 1.97 | .178 | .005 |
| Total | 8001 | 1.93 | .249 | .003 |

The second variable descriptive statistics yield more interesting results, however, the means also show that in the case of taking part in public demonstrations the responses are mostly negative. Table 3 presents the values of the means which are 1.85 for France, 1.96 for Romania, 1.96 for Great Britain and 1.97 for Hungary. The ANOVA test results also indicate in this case that there are significant differences between the group samples, with the $p < 0.05$.

Table 4 compares the mean differences between the samples and their significance. There are four significant relationships that can be observed between France and all the other three countries. The mean difference between France and Romania is -0.11 (0.008 standard error) with a significance coefficient of 0.001. The mean difference between France and Great Britain is -0.10 (0.007 standard error) at the 0.001 significance level. Finally, the mean difference between France and Hungary is -0.115 (0.008 standard error) with a significance coefficient of 0.001.

Table 5. Mean differences between countries and their significance (“public demonstration” variable).

| (I) Country values | (J) Country values | Mean Difference (I-J) | Standard Error | Significance |
|--------------------|--------------------|-----------------------|----------------|--------------|
| France | Romania | -.110* | .008 | .001 |
| | Great Britain | -.104* | .007 | .001 |
| | Hungary | -.115* | .008 | .001 |
| Romania | France | .110* | .008 | .001 |
| | Great Britain | .006 | .007 | .969 |
| | Hungary | -.006 | .008 | .983 |
| Great Britain | France | .104* | .007 | .001 |
| | Romania | -.006 | .007 | .969 |
| | Hungary | -.011 | .008 | .644 |
| Hungary | France | .115* | .008 | .001 |
| | Romania | .006 | .008 | .983 |
| | Great Britain | .011 | .008 | .644 |

* The mean difference is significant at the .05 level.

What exactly do these results tell us? Firstly it becomes quite clear that there are not great differences between the countries regarding the frequency of contacts between citizens and politicians. The levels of representative accountability by contacting politicians or government officials appears to be low in each country and there are no great differences between the Eastern and Western European countries that are the target of this study. When dealing with dichotomous variables, a 0.05 mean difference corresponds to a 5% percent difference between countries, a 0.10 mean difference corresponds to 10% difference and so on. The differences between the relative numbers of cases in which citizens contact politicians across the four countries are low and range between 0 and 5%. The statistical significance of the results does not mean that the results themselves are substantively significant. It means that we can say with 95% confidence that they are representative for the populations of the countries.

As far as the possibility of societal accountability relationships being established through public demonstrations, France appears to reach higher scores than the other countries (about 10% more than the other three countries) but not particularly high in real terms. The differences between all the other countries are basically negligible.

The question raised in this point is whether these results mean good news or bad news? The answer is: both. On the one hand they show that there are no significant differences between the Eastern and Western European countries in this study, regarding the mechanisms of representative and societal accountability. The comparison is restrained, of course, to mechanisms that involve contacts between citizens and politicians or public demonstrations. This observation shows that as far as representative and societal accountability is concerned, France and the UK do not necessarily perform better than Hungary or Romania. Nevertheless, the comparison has a limited scope, but future studies on these subtypes of accountability could focus on a larger number of countries.

On the other hand the results show that the willingness of the citizens to hold state officials accountable, through other means than elections, is low in all the four countries. It can be argued that normatively it is not such a loss that citizens do not act intensively as agents of accountability. It is not necessarily desirable that government officials are constantly asked to respond to citizens' demands. Too much accountability can backfire against democracy when a strong (and possibly authoritative) leadership has to be present in order to satisfy public demand (Whitehead 2002: 98).

There can be multiple reasons behind the fact that citizens are not strongly involved in societal and representative accountability relationships. It is, though, beyond the purpose of this paper to establish the causes behind the low levels of societal and representative accountability. However, it might be the case that stronger, legally established institutions¹⁷, exercise other forms of accountability complementing the one between citizens and state officials. Further research on mechanisms of accountability could focus exactly on the differences between different subtypes of accountability. More precisely, it is still unclear whether societal or representative forms of accountability are more effective than horizontal

¹⁷ Here, I refer to institutions that define horizontal mechanisms of accountability (such as Parliamentary control over the Government, the control of central government institutions over the local ones) or vertical accountability through elections.

mechanisms of accountability. The idea that “the corporate interests of the state bureaucracy” (Schmitter 1999: 60) are too strong for independent state agencies to hold each other accountable still remains to be empirically tested.

CONCLUSIONS

In this thesis I had aimed to make a comparison between Eastern and Western Europe concerning political accountability. More specifically, the goal was to determine whether in Western Europe the mechanisms of political accountability function better than in Eastern Europe.

The greatest part of the literature on democratization had emphasized the institutional and cultural differences between post-communist and democratic countries. Public debates in Eastern Europe after the fall of communism were attempting to establish what are the causes of the prolonged transition to democracy. Among these causes the lack of accountability of public officials was often mentioned. Good mechanisms of accountability were perceived to be essential for the emergence and preservation of democracy, as they would reduce corruption and make government officials more responsible to the public. A largely used definition of democracy included accountability as one of its main dimensions (Schmitter and Karl 1991).

The main question of this paper started from the above mentioned definition. If democracy implies that representatives are held accountable for the decisions that affect the citizens. And if previous literature and general perception argue that there are major differences between Eastern and Western democracies; could it be that these differences are due to lower levels of political accountability in the East and better accountability in the West? More precisely, the research question of this paper was: *what are the differences and similarities regarding political accountability in Eastern and Western European democracies?*

To answer this question I proceeded by explaining the complex concept of political accountability. Even though there is still much disagreement on the very definition of accountability, I supported the argument that accountability is a radial concept. Viewed in

this way, accountability can be studied empirically, by focusing on its subcategories. Next, I argued that the most efficient agents of accountability are citizens and civil society organizations, for one important reason: state institutions tend to collude and, therefore, do not always hold other institutions accountable for their activity. Moreover, the democratic principle that the people are sovereign and they delegate power to their leaders, turns accountability into a matter between citizens and state officials. I did not deny that horizontal accountability is necessarily weaker than vertical accountability¹⁸, but I rather argued that in post-communist countries any forms of accountability should be weaker than in older democracies.

In the empirical analysis I, firstly, attempted to show how legal institutions enhance accountability and observed whether there are differences between countries regarding this aspect. Secondly, previous authors have identified representative and societal accountability as two subtypes in which accountability is a relationship between citizens and public officials. Starting from this point I compared the four countries in this study along two indicators of societal and representative accountability.

The results of this analysis showed that there are more similarities between the four countries than differences. As a positive finding, the legal frameworks that establish the access to public information in order to hold state officials accountable have the same characteristics in France, UK, Hungary and Romania. However, the cases of infringement show that the mere presence of the legal frameworks that regulate accountability are not enough for holding state institutions accountable.

The second analysis shows that citizens in all the four countries rarely contact politicians or participate in public demonstrations. The more significant differences occur in the case of Britain, where citizens contact politicians more often than in the other three

¹⁸ In fact it might be the case that in representative democracies horizontal accountability mechanisms are even more efficient than vertical accountability.

countries. In France, people took part more often in public demonstrations than in other countries.

Whether this is bad news for accountability is quite unclear as long as the causes behind these results are not researched in the future. However, it might be case that people in these countries are generally satisfied with the decisions taken by their governments and do not participate in public protests against the government. Or it can also be that ordinary citizens feel that they cannot influence the political life in their countries by other means than elections. The low percentage of the citizens that contact government officials might be explained by the same factors as the ones mentioned above. Furthermore, the electoral systems can also increase or decrease the distance between citizens and politicians. This might be the reason why in Britain, where we have a majoritarian system, citizens contact politicians more often than in France, Romania or Hungary where there are proportional or mixed systems.

The descriptive goal that I set in this thesis might also provide useful for further comparisons of accountability between Eastern and Western European countries. Interesting causal questions can be developed, in future studies, in the case of relevant variation across cases. So far, the analysis of accountability in the four countries in this paper has shown little differences between Eastern and Western European democracies.

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