

Accountability in densely institutionalized governance spaces

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Abstract

The concept of organizational accountability is central to good governance both domestically and internationally. However, assessing accountability in densely institutionalized global governance spaces requires new conceptual and analytical tools. Rather than concentrating on the accountability of states, intergovernmental organizations (IGOs), non-governmental organizations (NGOs), and transnational corporations as distinct sets of global actors to whom different accountability criteria and mechanisms may apply, we want to focus on how growing overlap and interplay *among* diverse global policy actors affects organizational accountability. And rather than focusing exclusively on accountability in terms of retrospective sanctioning based on fixed standards or legal obligations, we suggest that, in a densely institutionalized world, accountability also needs to be thought of as a prospective process. We therefore suggest a stronger focus on pluralistic, participatory, and deliberative forms of accountability that emphasize standard-setting and responsiveness through collective deliberation, learning, and competition.

1 | THE PROBLEM OF ACCOUNTABILITY WHEN ORGANIZATIONS OVERLAP

Recent decades have seen a proliferation of international organizations (IOs) with overlapping memberships, functions, and authority claims (Alter & Meunier, 2009; Eilstrup-Sangiovanni & Westerwinter, 2022; Raustiala & Victor, 2004).¹ For many policy issues, more than one organization can claim competency. With the increase of IOs, international relations scholars and legal and public administration experts have begun to pay more attention to organizational accountability beyond the state (e.g., Andonova, 2022; Curtin & Nollkaemper, 2005; Lall, 2023b; Park, 2015). Research has shown that overlapping memberships can lead to different legal and normative standards across IOs (Raustiala & Victor, 2004) and that IOs can interfere in each other's operational business (Hofmann, 2019). Organizational overlap can therefore make it harder to place responsibility for specific actions and governance outcomes.

Yet, the implications of growing organizational overlap for accountability have yet to be fully explored.

Answering questions of accountability is essential in today's organizationally crowded world. In a world where more and more issues require solutions at the international level, where norms of democratic decision-making and fairness are increasingly in focus and where powerful actors use international organizations to push competing visions of world order, accountable governance is crucial not only to prevent abuses of power (Grant & Keohane, 2005; Schedler, 1999) but also to improve governance effectiveness (Bovens, 2007; Lall, 2023a). Meanwhile, questions of accountability take on new dimensions in densely institutionalized settings which feature organizational overlap, as determining who is entitled to hold whom to account, according to what standards, and through what mechanisms becomes increasingly difficult.

This Special Section raises three fundamental questions regarding accountability in densely institutionalized governance spaces (Clarke, 2019:

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699–700), which have variably been labeled “regime complexes” (Raustiala & Victor, 2004), “global governance complexes” (Eilstrup-Sangiovanni & Westerwinter, 2022), and “hybrid governance complexes” (Abbott & Faude, 2022). The first question is conceptual. What do we mean by accountability? The second question is more analytical and empirical: What kinds of accountability relations and mechanisms operate in densely institutionalized settings? The final question is normative: How should we assess these arrangements? To what extent do they deliver meaningful accountability?²

We suggest that understanding accountability in densely institutionalized global governance spaces requires new conceptual and analytical tools. First, a conceptualization of accountability for our contemporary world must take into account organizational overlap, which often leads to non-hierarchical and shifting inter-institutional relationships. Most existing notions of accountability focus on the formal rights by some actor(s) to hold others accountable to set standards or obligations through retrospective sanctioning. In contrast, we focus on a more forward-looking, interactive, and dynamic form of accountability suitable for densely institutionalized governance spaces. This form of accountability is not necessarily formal and hierarchical, nor is it exclusively retrospective, but also includes a prospective dimension, embracing aims such as widened participation, joint standard-setting, and prevention of harm (see Andonova, 2022; Moncrieffe, 2001). We do not propose that this form of accountability should *replace* existing notions and mechanisms; rather we present our view as an *additional* way of achieving accountability, which may be more suitable for today's densely institutionalized world.

Second, analytically, we argue that given growing organizational overlap at the global level, accountability can no longer be analyzed solely at the level of individual organizations or legal frameworks. Instead, it requires a more holistic approach that considers the wider context in which a given organization operates. This wider context includes the existence and availability of information on overlapping organizational standards and activities, for example. In short, accountability must be understood not (merely) as an aspiration or attribute of single IOs, but as a collective property of multiple institutions (or governance systems) that fulfill intersecting tasks and mandates.

Third, to ensure effective accountability in complex governance spaces we propose to broaden the analytic focus beyond retrospective accountability mechanisms to include more prospective ones. We suggest three in particular: collective deliberation, learning, and competition. These mechanisms build on a pluralist, peer-to-peer understanding of effective accountability relationships rather than formal, hierarchical relations. Individual contributions to this Special Section evaluate

to what extent these mechanisms can currently be seen to deliver accountability in different domains of global governance.

This Special Section does not offer an exhaustive account of accountability mechanisms in densely institutionalized settings. Our more modest aim is to stimulate debate on how one might (re)conceive accountability in a densely institutionalized world by emphasizing new accountability functions, opportunities, and challenges. In what follows, we first discuss how organizational accountability has been conceived in major scholarly debates to date and introduce our vision of effective accountability mechanisms for densely institutionalized settings. This conceptual framework lays the ground for the individual contributions of this Special Section. These contributions examine how accountability has been achieved (or not) across various densely institutionalized policy domains including development (Haug & Taggart, this issue), cyberspace (Pawlak, this issue), security (Hofmann, Karlsrud & Reykers, this issue), and the environment (Earsom, this issue), and across different types of organizations, including both formal and informal IOs (Roger, this issue), ad hoc coalitions (Hofmann, Karlsrud & Reykers, this issue), partnerships (Earsom, this issue), and multistakeholder initiatives (Haug & Taggart, this issue). Contributors pay specific attention to which existing accountability mechanisms are considered important in their policy domains, what inter-organizational initiatives have emerged, and how these existing arrangements have fared in terms of ensuring effective accountability. We have also asked contributors to reflect on what might be done to enhance accountability in the policy domain they focus on.

2 | ORGANIZATIONAL ACCOUNTABILITY BEYOND THE STATE

International organizations, whether public or private, are created to fulfill a host of political, task-specific, and symbolic functions. Politicians, board members, bureaucrats, and donors set out to define the realm of responsibilities that these organizations are deemed to hold. There are many reasons, however, why IOs may not always fulfill their responsibilities. Some reasons may be legitimate: lack of resources or expertise may count here. Others may amount to neglect or abuse of power. Thus, some mechanism must be established to determine whether there are legitimate reasons why governance responsibilities fail to be properly executed and for holding responsible agents accountable if not.

Organizational accountability emerged as a prominent topic in the 2000s. Then, the One World Trust began to investigate the accountability of large and influential intergovernmental organizations (IGOs), transnational corporations, and NGOs under the

Global Accountability Project Framework.³ In 2004, the International Law Association published a report on the accountability of international organizations.⁴ In the following years, many studies elaborated concepts of organizational accountability “beyond the state” (Buchanan & Keohane, 2006; Curtin & Nollkaemper, 2005; Grant & Keohane, 2005; Heldt, 2018).⁵ Most studies, however, focused on accountability mechanisms for either IGOs, NGOs, or multinational corporations separately and individually (see esp. Grant & Keohane, 2005).

A traditional approach understands accountability as the right of some actor(s) to hold others accountable to set standards or legal obligations through retrospective sanctions (Grant & Keohane, 2005: 28). On this view, accountability is a mechanism by which actors can be “called to account for their actions” by some authority that asserts a superior right over those held accountable, including the right to pass judgment and to impose sanctions (Curtin & Nollkaemper, 2005: 4). Such a right may arise from delegation from a principal to an agent or from legal rules and procedures that empower some specified actor(s) to sanction others for shortcomings or wrongdoings. Yet, in a context where organizations may be subject to competing standards and legal obligations, and where formal chains of delegation are often absent, or crisscrossing, many worry that traditional accountability mechanisms are weakening (Benvenisti & Downs, 2007; Drezner, 2009). Indeed, a precondition for international legal accountability (as applied to states) is that legal rules must be compatible with one another, that they must ask reasonable things, and that they are transparent and relatively predictable in how they guide state action (Brunnée, 2005). These requirements often fail to be satisfied in today’s complex global governance settings. Furthermore, in a global context that increasingly features private and public authority, it is not clear that one definition of accountability (or one set of mechanisms for achieving it) fits all.

In their seminal article on this topic, Grant and Keohane (2005) address concerns about the use and abuse of organizational authority. Accountability to them means that “some actors have the right to hold other actors to a set of standards, to judge whether they have fulfilled their responsibilities in light of these standards, and to impose sanctions if they determine that these responsibilities have not been met” (2005: 29). Building on this definition, many later conceptualizations focus on three essential accountability functions: standard-setting, monitoring, and sanctioning (Bovens, 2007; Heldt, 2018; Hirschmann, 2019; Koenig-Archibugi, 2010). Standard setting involves identifying or formulating clear criteria for proper conduct. Monitoring involves mechanisms for reporting and surveillance of conduct. Sanctioning denotes ways in which accountability holders may penalize those held to account for violating legal obligations or widely accepted norms and standards.

From this arises the question: *Who* defines standards and *who* holds *whom* to account through what forms of sanctioning? In the context of representative democracies, elected rulers or appointed officials are expected to justify their actions in public and to be receptive to feedback from citizens. Democratic accountability is often viewed as the ideal, even at the global level. Some go as far as to argue that the baseline for accountability is a cosmopolitan polity (Held, 2004). However, given the lack of a defined global demos and the dearth of directly elected parliaments, most deem democratic accountability to be unachievable at the global level (Curtin & Nollkaemper, 2005).

Given the difficulty of implementing democratic accountability mechanisms on the global level, many argue instead for either “hierarchical” or “pluralist” forms of accountability as more appropriate. In hierarchical accountability relationships, implementing agents are held accountable by a mandating authority (a “principal”) that authorizes or enables their actions (Bovens, 2007; Grant & Keohane, 2005). Principals may hold agents accountable by issuing formal mandates which outline the scope of their activities and define the standards for their conduct or by withholding essential support such as budgetary allocations or grants (Grant & Keohane, 2005: 37). In pluralist accountability relationships, implementing agents are instead held accountable by external, third parties who set standards, and monitor and sanction conduct (Hirschmann, 2019). These third-party “accountors” may be stakeholders who are directly affected by the actions and policies of implementing agents (Lall, 2023b) or effective standard setters such as norm entrepreneurs, NGOs, peer institutions, independent media, ombudsmen, truth commissions, or expert committees that develop guidelines and expectations, and shed light on abuses (Hirschmann, 2019; Lall, 2023b; McNeil & Malena, 2010). A key difference between hierarchical and pluralist accountability is thus that whereas the former presumes that accountees are linked to accountors through formal links (Grigorescu, 2008; Keohane & Nye, 2003; Krisch, 2013), pluralist accountability relationships assume neither delegation nor formal links. Moreover, whereas hierarchical accountability implies a relationship of super- and subordination, pluralist accountability relationships connect relatively autonomous actors as notional equals (Schedler, 1999). Thus, pluralist accountability is often referred to as “social” or “horizontal” accountability (Bovens, 2007; Krisch, 2013; McNeil & Malena, 2010).

Besides distinguishing different types of accountability relationships, extant literature identifies different mechanisms whereby actors hold others to account. Grant and Keohane (2005) identify seven such mechanisms: “(intra-)hierarchical,” “supervisory,” “fiscal,” “legal,” “market,” “peer,” and “reputational.” The first four depend on some measure of formal delegation,

whereas the remaining three involve forms of participation that extend beyond formal and legalized relationships (ibid.). We briefly summarize these mechanisms as we find they offer a useful starting point for thinking about what does and does not work for ensuring accountability in densely institutionalized governance spaces.

1. *Hierarchical* accountability applies to relationships *within* organizations, such as those between heads of division and desk officers.
2. *Supervisory* accountability applies *between organizations* when one organization acts as principal with respect to one or more agents. For example, domestic and international courts can hold governments and private companies to account for wrongdoings.
3. *Legal accountability* implies that agents must abide by formal rules and be prepared to justify their actions according to such rules in courts or other judicial arenas. It requires both that actors are held to account for acts that conflict with law and that procedures of justification and possible consequences are governed by law (Curtin & Nollkaemper, 2005:11).
4. *Fiscal accountability* describes mechanisms through which donors and funding agencies can demand reports from, and sanction, recipients.
5. *Market accountability* denotes mechanisms whereby investors and consumers may refuse to support or buy products from companies with reputations for poor conduct.
6. *Peer accountability* arises from mutual evaluation of organizations by their counterparts. Organizations that are poorly rated by peers may find it difficult to persuade others to cooperate and therefore face barriers to achieving their own purposes.
7. *Public reputational accountability* refers to organizations' responsiveness to interest groups, charities, NGOs, media, and other social groups that have influence but hold no formal authority.

These mechanisms offer a useful starting point for thinking about accountability at the level of global governance. We start with three observations. First, most of these mechanisms refer to processes of "holding to account" (i.e., judging and sanctioning behavior *ex post facto*) rather than "giving account" as a (less demanding) process of disclosing information and justifying behavior (Curtin & Nollkaemper, 2005: 7). Second, the mechanisms are not mutually exclusive; organizations may be accountable in more than one sense. Third, and most relevant to this Special Section, the mechanisms are also not necessarily additive. Indeed, they may even be contradictory. What if a donor's demand conflicts with an organization's legal mandate? What if different public audiences evaluate an IO's performance differently? What if an organization's mandate and functions straddles different legal regimes which

impose different obligations? In this case, satisfying the demands of one accountor may mean defying others. As we discuss in the next section, such predicaments are more likely to arise in densely institutionalized settings where membership, mandates, and functions overlap. Indeed, a pessimistic view holds that organizational complexity threatens to undermine international transparency and compliance with legal obligations, weakening public accountability (Benvenisti & Downs, 2007; Drezner, 2009, 2013). Rather than accept this pessimistic view *tout court*, we propose that assessing accountability in densely institutionalized governance spaces requires new conceptual and analytical tools. In the following section, we discuss what specific accountability problems may arise in densely institutionalized governance settings while the section after that focuses on potential solutions.

3 | ACCOUNTABILITY CHALLENGES IN DENSELY INSTITUTIONALIZED GOVERNANCE SPACES

Traditional views of accountability assume (a) clear standards of performance and conduct and (b) clear lines of authority based on legal mandate, formal delegation, or resource provision. These criteria can be difficult to meet when organizations operate in densely institutionalized environments in which they may be called upon to comply with competing standards or work across separate jurisdictions. Rather than being legally accountable to a single standard and requirement, or to a single principal that authorizes and supports their actions, actors in densely institutionalized governance spaces may answer to multiple standards and requirements. In this case, what are potential alternative ways of achieving accountability?

Densely institutionalized governance spaces or "governance complexes" connote areas of ongoing organizational activity in a specific policy domain where multiple, overlapping organizations and actors fulfill similar functions and tasks through both competition and cooperation. These governance spaces are not static; their size, policy scope, and institutional density can change over time as constituent organizations change the scope of their activities, and as new organizations and organizational forms populate the space (Eilstrup-Sangiovanni & Westerwinter, 2022; Haftel & Hofmann, 2017, 2019).

Focusing on governance complexes rather than individual IOs shifts our perspective on accountability in at least two ways. First, it highlights that IOs may have dense inter-organizational relationships and agreements that influence how accountable they are and to whom. Second, the concept of a governance complex provides an additional yardstick for assessing

organizational accountability. Given that constituent organizations in governance complexes do not operate in isolation but are enabled and constrained by one another's activities, their accountability cannot simply be judged on an individual basis; the way(s) in which their performance is conditioned by their broader environment must also be in focus. While it is certainly conceivable that governance actors exploit overlapping mandates and conflicting standards to escape specific obligations or shirk wider responsibilities, it is at least theoretically possible that they use their multiple memberships in different IOs in the interest of the broader public good, for example, by circumventing gridlock in one organization and coordinating collective action in another to increase responsiveness to the needs and preferences of a broad range of stakeholders (Hofmann, 2019).

Each of the three basic accountability functions highlighted in extant literature—standard-setting, monitoring, and sanctioning—poses unique difficulties in the context of densely institutionalized governance spaces. As already discussed, extant literature identifies common standards (i.e., standards that are derived from norms that are regarded as generally legitimate by both the accountability holder and the accountant) as a precondition for accountability. Common standards establish, “not only the criteria by which the use of power can be judged, but also who is authorized to wield power and who is properly entitled to call the power-wielders to account” (Grant & Keohane, 2005: 29). Yet, in many global governance settings, common standards—beyond generally accepted human rights norms or (customary) international law—either do not exist or are evolving. What's more, actors in governance complexes frequently deal with issues that transcend jurisdictional boundaries, making it challenging to behave in accordance with applicable laws, norms, and obligations across different jurisdictions (Schedler, 1999: 22). If there is more than one legal or normative standard governing interactions among actors, to whom or what are actors then accountable?

Just as clear and mutually compatible legal standards may be missing, notions of hierarchical or supervisory accountability are also difficult to apply directly to governance complexes. Hierarchical accountability relationships presuppose delegation or formal institutional links which establish clear lines of responsibility and authority. Grant and Keohane (2005:29) speak of “an authorized or institutionalized accountability relationship when the requirement to report, and the right to sanction, are mutually understood and accepted.” Yet such accountability relationships may be scarce (or weak) in densely institutionalized governance spaces, which tend to feature an abundance of informal, ad hoc relationships as individual contributions to this Special Section attest to. Governance complexes often comprise a multitude of different actors that “self-organize”

into collaborative or competing structures, or that are loosely coordinated or orchestrated by IGOs (Abbott et al., 2015). As such, they often lack formal links or clear chains of delegation. In turn, this means that some actors or entities may claim a right to hold others accountable to certain standards, whereas those held accountable do not recognize a corresponding obligation to abide. Even when delegation takes place, overlapping obligations can make accountability harder to achieve. It is well known, for example, that “multiple principals” set-ups—situations in which a single agent has more than one contract with organizationally distinct principals—can weaken accountability (Hirschmann, 2019). Similarly, complex patterns of collaboration and competition can make it harder for principals to trace specific actions to individual implementing agents. When many hands are involved, it can be difficult to determine who has contributed in what way and hence who is the responsible actor.

The difficulty of articulating clear common standards and of determining who is accountable to whom poses obvious problems for monitoring and sanctioning. Not only is it difficult to determine who is to be sanctioned for particular outcomes or when sanctions are warranted given that norms and rules guiding behavior are often non-binding or potentially conflicting, but to the extent that both monitoring and sanctioning are costly, organizational overlap also gives rise to a secondary problem of who is responsible for monitoring conduct and applying sanctions. These difficulties all speak in favor of focusing less on retrospective sanctioning and more on forms of forward-looking or prospective and “pluralist” accountability as we do in the following section.⁶

4 | ACCOUNTABILITY IN GOVERNANCE COMPLEXES: PROSPECTIVE, PLURALIST, HORIZONTAL, AND DELIBERATIVE

Before we sketch our vision for effective accountability in densely institutionalized governance spaces, it is important to stress that we do not wish to dismiss previous conceptualizations of effective accountability mechanisms for individual IOs, NGOs, TGNs, and MNCs (e.g., Grant & Keohane, 2005). Our point is that accountability mechanisms that apply to states, IOs, NGOs, and firms *individually* may not always be sufficient or appropriate in a complex institutional setting, where many governance processes involve diverse types of actors, where lines of delegation and authority may be blurred, and where shared norms and standards may be missing. In such settings, criteria and mechanisms of individual accountability need to be rethought and complemented with additional or alternative mechanisms of *collective* accountability (Benner et al., 2004).

Given the involvement of multiple and diverse governance actors and a pre-dominance of informal relationships, we suggest that pluralist accountability mechanisms are most appropriate for governance complexes. Indeed, while overlapping organizational mandates, functions, and membership may make it harder to clearly separate “accountees” from “accountors,” they also offer rich opportunities for effective peer-to-peer and reputation-based mechanisms of accountability that valorize the fact that many political actors participate in governance and engage in continued exchange of information through multiple, overlapping organizations.

To our mind, what distinguishes accountability processes in the context of densely institutionalized governance spaces from individual organizational accountability mechanisms is that (a) they should be thought of as processes that engage actors simultaneously across organizations; (b) they must be forward-thinking, embracing elements of widened participation, ongoing deliberation, and collective standard setting; and (c) they do not rest on hierarchical relations that clearly point to a “final judge.” As highlighted above, traditionally conceived, accountability is understood predominantly as a *retrospective* process through which designated accountors demand an account of prior conduct and seek to expose, judge, and sanction any wrongful actions (Grant & Keohane, 2005: 29). Although retrospective sanctioning is generally enacted also with the aim of changing future behavior (and thus is never fully backward-looking), this view can be contrasted with a more participative and ongoing process of accountability, which has a stronger *prospective* aspect, emphasizing issues such as participation, collective standard setting, and prevention of harm (Curtin & Nollkaemper, 2005; Moncrieffe, 2001). This prospective form of accountability suggests that to act effectively in the interests of wider publics or affected stakeholders, those wielding authority must know what these interests are. In turn, this means they must allow for deliberation and consultation so policies can be corrected where necessary, keep stakeholders apprised of choices, and provide explanations and opportunities for public feedback (Lall, 2023b; Moncrieffe, 2001). It also implies that individual IOs must consider how their actions may impact others, including those outside their immediate official purview. If an organization pursues its mandate in a manner that seems efficient and responsive from an internal perspective, might there be negative consequences for others? If properly implemented, these forms of prospective and synchronous accountability mechanisms allow for a continual check on policies, not only with a focus on preventing direct abuses of power but also with the aim of enhancing governance agents' responsiveness to one another and to the wider interests they are expected to serve.

A focus on collective consultation, deliberation, and forward thinking does not imply an absence of

monitoring and sanctioning. However, we suggest that monitoring in governance complexes must rely on pluralist peer-to-peer mechanisms in addition to vertical reporting. Similarly, most understanding of accountability requires that actors face potential consequences for their actions. We agree, but advocate broadening our view from solely negative consequences to positive rewards as well. We also emphasize that sanctioning does not have to take a formal or material form or to be carried out exclusively by institutionally linked “superiors” or supervisors. As Schedler (1999) notes, many expressions of public reputational accountability rely on discursive forms of contestation with public disapproval being the main negative consequence of perceived misconduct.

To recap, we suggest that achieving accountability in densely institutionalized governance spaces is not only, or predominantly, about ensuring reliable *ex post* scrutiny and sanctioning, but rather about anticipation, deliberation, and mutual adjustment to enable risk management and reduction. Norms and policies are adjusted as actors, who are members of several organizations or otherwise need to respond to different organizational demands, anticipate negative evaluations or consequences for themselves or their peers (Bovens, 2007). This requires dialog and frequent cross-institutional evaluation. Hence, accountability requires a deliberative relationship between different governance actors who together discuss and (re)define standards, monitor each other, and engage in dialog to anticipate the consequences of different actions (Schedler, 1999). To the extent that “retrospective” evaluations are made, such evaluations must be sensitive to the fact that many actors fulfill similar mandates and functions and may work towards both shared and individual (even potentially conflicting) goals. In such conditions, accountability depends on the extent to which actors are able *collectively* to define, refine, and realize shared objectives.

So how can prospective collective accountability be achieved in practical terms? In the rest of this section, we consider each of the three essential accountability functions—standard-setting, monitoring, sanctioning—from the perspective of a prospective understanding of accountability.

4.1 | Setting and applying standards

Considering accountability not only within but also across governance organizations pushes us to move away from a (sole) focus on formal mandates that establish specific legal obligations and standards for individual IOs (e.g., Grant & Keohane, 2005) to focus on whether organizational conduct is consistent with more general and widely accepted norms. In the absence of clear lines of delegation, some

scholars have advocated focusing more on the extent to which actors are held accountable for conformance to standards enshrined in general international law or customary practices (Koenig-Archibugi, 2010). In this regard, recent decades have seen a rapid proliferation of international courts, tribunals, auditors, ombudsmen, and truth commissions who can receive and review complaints. When it comes to ensuring accountability through these mechanisms, oversight often comes sideways. For example, enforcement of international law against states and multinational companies is sometimes carried out by NGOs acting independently of states or IOs (Eilstrup-Sangiovanni & Sharman, 2022). There are also many cases of NGOs holding each other accountable to international law or to widely shared informal norms. For example, in 2014, Survival International lodged a complaint to the OECD against the World Wildlife Foundation (WWF) for violating the human rights of the indigenous Baka “Pygmies” of Southeast Cameroon by supporting the creation of several national parks without prior and informed consent of the Baka who experienced an increase in violence against them by WWF-sponsored anti-poaching squads.⁷ The complaint alleged that WWF’s failure to consult with and seek the consent of affected stakeholders resulted in a violation of the Baka’s human rights.

States and IOs have also introduced compliance regimes under international environmental and human rights agreements (Curtin & Nollkaemper, 2005). Such mechanisms often do not involve a determination of responsibility or liability but are shaped by international law in a more general sense (Brunnée, 2005). For example, in the human rights field, implementation review is an increasingly important accountability mechanism. Under the ICCPR, parties must periodically report to the Human Rights Committee (HRC) on what legislative, judicial, and administrative measures they have adopted to implement the convention. This review process does not lead to explicit judgments regarding treaty compliance but ushers in a “constructive dialog” through which the HRC and other state parties (and through them, often NGOs) comment on positive aspects of implementation efforts, raise issues of concern, and offer recommendations for improvement (Curtin & Nollkaemper, 2005; Milewicz & Goodin, 2018). There is thus a facilitative process of advice and recommendations. In turn, the party under review drafts a response with concrete action points for how to improve its conduct. This and similar review procedures have been found to support deliberative structures that involve multiple diverse actors in the process of identifying standards and evaluating conduct in the human rights field (*ibid.*). Similarly, many environmental regimes, climate change being a prime example, have a hybrid policy architecture that combines voluntary pledges by states with an international framework for

periodic review and ratcheting up of ambitions through dialog with wider stakeholder groups (Bäckstrand et al., 2017).

Not only do we advocate looking beyond legal standards enshrined in formal organizational mandates, but, perhaps more importantly, we recommend focusing on standard-setting as a *process* rather than a set-in-stone activity. This focus on process draws attention to likely periods of relatively stable and consensual interpretations of common standards and periods of contentious reinterpretation or even the creation of rival standards. In periods of rivaling standards, overall accountability might be reduced, as actors can invoke inconsistent norms and standards to justify their actions (Benvenuti & Downs, 2007; Drezner, 2009; Raustiala & Victor, 2004). However, these tensions between rival standards that expose actors to contradicting pressures can also lead to periods where common—if only very broad—interpretation of standards will be evoked. Attempts at joint standard-setting and harmonization of rules, for example, may reduce conflicting demands (Gehring & Faude, 2014; Raustiala & Victor, 2004).

4.2 | Monitoring

In densely institutionalized governance spaces, effective accountability requires both self-monitoring and monitoring by others. What is special in the context of densely institutionalized governance spaces is that sometimes the “self” might also be the “other,” as actors can be members of more than one organization. Hence, while individual entities must allow scrutiny of their activities and conduct (Hirschmann, 2019; Schedler, 1999), this does not only mean monitoring the conduct of your peers but also learning from different parts of your own organization what drives policy in different IOs and collating this information (Hofmann, 2019). For example, how Germany positions itself and engages with the EU’s Common Security and Defense Policy is discussed in a different unit within the German Foreign Ministry than how it positions itself and engages with NATO. Given that both units are situated within the same ministry and can deliberate, exchange information, and learn from each other, some accountability not only towards German taxpayers but also towards both organizational mandates can be established at this microlevel.

Similar to standard setting, monitoring should be therefore understood as an ongoing process rather than (merely) as a periodic formally scheduled activity. The emphasis on process gives greater voice and agency to national and international bureaucrats that have to juggle different standards and organizational politicking and who are therefore well-positioned to unearth abuses of power and challenge actors’ reputation.

4.3 | Sanctioning

Sanctioning in densely institutionalized governance spaces can occur in different ways as well. When organizations overlap in functions and membership, they can offer opportunities for parties who are members of multiple IOs to exit specific collaborative relationships as a way to sanction others for poor conduct (Bäckstrand et al., 2017). This form of decentralized sanctioning may be effective where incentives to sanction are strong and where the capacity to do so is distributed widely (Grant & Keohane, 2005). That said, the emphasis on pluralist and dynamic accountability that is forward- rather than backward-looking can also help (at least partially) to avoid the so-called “accountability trap” (Park & Kramarz, 2019). This trap refers to backward-looking accountability mechanisms which can stall and even hinder international and transnational cooperation, as actors are required to account for every action *ex post*. An industry of monitors and evaluators has emerged to fulfill this task. The appearance of being accountable can thus become more important than actually being accountable. The kind of collective, pluralist accountability we propose here, on the other hand, lends itself better to (a) working together to enhance collective accountability through deliberation and collaboration, and (b) relying on less resource-demanding third-party “fire alarms” to prevent abuses of power.

Our discussion of standard-setting, monitoring, and sanctioning in complex governance settings leads us to propose three forward-looking and pluralist accountability mechanisms:

1. *Accountability through deliberation.* Prospective accountability mechanisms open the door to emphasizing the deliberative potential between overlapping organizations and networks, something that Moravcsik (2004) observed in the context of the EU. Given that at least some actors are simultaneously members not only of one but several organizations that act in the same issue area, they can act as “deliberation instigators” within and across organizations. This peer accountability as networks allows for more channels to communicate demands and opportunities for accountability (see also Bexell et al., 2010). Accountability in densely institutionalized governance spaces can therefore build on deliberative relationship between different actors who together discuss, define and (re)define standards, monitor each other through peer-to-peer observations, and engage in dialog to anticipate the consequences of different actions.
2. *Accountability through interactive learning.* Individual organizations usually engage in best practices or “lessons learned” exercises. These are just two of various forms through which organization can

learn from past mistakes. Learning teaches others in similar positions what is expected of them and may prompt them to rethink and adjust their policies. Interactive accountability mechanisms induce openness and reflexivity in political and administrative systems that might otherwise be primarily inward looking. The crucial questions from this perspective are whether the accountability arrangements offer sufficient feedback, but also the right incentives, to officials and agencies to reflect upon their policies and procedures and to improve upon them.

3. *Accountability through inter-organizational competition.* Organizational competition can stimulate actors to monitor each other and to try to be optimally responsive (Alter & Meunier, 2009; Eilstrup-Sangiovanni, 2022). If issues emerge that are ambiguous with respect to proper jurisdiction and policy delimitations, competition between organizations can be a form of accountability (Koppell, 2005; Hofmann & Pawlak, 2023), especially if they put actors in situations where they have to enact or ratify competing standards across different organizations.

5 | INDIVIDUAL CONTRIBUTIONS AND PRELIMINARY OBSERVATIONS

Recent decades have seen a substantial shift in governance capacity and public authority away from the territorial state towards new and diverse forms and levels of governance, which are often crisscrossing. However, this shift has not been matched by a corresponding shift in how we think about accountability mechanisms beyond those applicable within states and individual IOs. When considering how to achieve accountability in global governance settings, many turn to traditional views of formal delegation and subordination, which facilitates vertical monitoring and sanctioning.

This renewed focus on organizational accountability comes at a time when geopolitical power is shifting and powerful state actors, often from the Global North, are criticized for having structured global governance without the Global South in mind. As a result, more and more actors demand greater voice and recognition across existing IOs or create new IOs to further their interests. In this context, it is crucial to think about what kind of accountability mechanisms can be effectively applied in a densely institutionalized and politically contested global governance system and how.

In this Special Section, we make the case for a new conceptual perspective on organizational accountability based on a recognition of the plurality of legal and political standards across the plethora of existing IOs. Our preliminary observations are that organizational complexity weakens traditional hierarchical/legal accountability mechanisms, but also creates opportunities for new forms of pluralist accountability. When

considering accountability in governance complexes, we often observe *more* rather than *fewer* and more *diverse* accountability mechanisms than in a traditional IGO-state framework. Promised governance outcomes are frequently achieved, not by single IOs, but by either a coordinated effort among multiple organizations, or by individual actors skillfully using multiple memberships to achieve a promised outcome.

We suggest deliberation, learning, and competition as important accountability mechanisms in densely institutionalized and non-hierarchical organizational settings. Individual contributions to this Special Section assess how these mechanisms fare in different policy domains and types of organizations. Overall, the contributions draw a complex picture which demonstrates that institutional designers who wish to engage more with organizational accountability across organizations face significant challenges. They also demonstrate that across different policy domains, efforts have already been made to at least informally coordinate standard-setting, decision-making and operations between various organizational actors, whether through multistakeholder approaches (Haug & Taggart, this issue), ad hoc coalitions (Hofmann, Karlsrud, & Reykers, this issue), global-regional IO interactions and peer-to-peer exercises (Pawlak, this issue), interlinkages (Roger, this issue), or partnerships (Earsom, this issue).

The individual contributions also point to important differences across policy domains, in particular between (relatively) newer policy domains such as cyberspace and climate (finance) where state interests are arguably less entrenched, and older domains such as development and crisis management, where powerful actors are often resistant to change. Pawlak (this issue) observes that prospective accountability mechanisms rooted in deliberation, learning, and competition are a way out of the security-driven understanding of accountability in the cyberspace domain. In his examination of the Just Energy Transition Partnership, Earsom (this issue) demonstrates how prospective accountability mechanisms are enacted, but also points to important accountability gaps that remain unplugged through these mechanisms. When looking at development policy, on the other hand, Haug and Taggart (this issue) show that prospective accountability mechanisms can be challenged by powerful actors. By examining efforts to bring together all actors in one organizational setting in the development policy domain, they remind us that backward-looking sanctioning mechanisms are also needed, as otherwise powerful actors might be privileged and interactive learning hard to establish. Hofmann, Karlsrud, and Reykers (this issue) likewise observe that powerful actors can use backward and forward-looking accountability mechanisms to further their own interests. At the same time, both the contributions by Haug and Taggart and by Hofmann, Karlsrud, and Reykers highlight that the interaction between IOs provides actors with more

information, which is a crucial first step for holding each other accountable. Lastly, Roger (this issue) reminds us that informal organizations which may have been created partly to avoid oversight, can become more accountable through direct and indirect institutional inter-linkages.

We do not claim to offer a solution to power abuses in today's organizationally complex world nor to offer a comprehensive discussion of the problem. Our cursory discussion may even at times appear naïve. However, our aim in putting together this Special Section on accountability has been to illustrate that there is a need for new thinking and conceptual tools. It is an invitation to debate. In closing, we agree with Lall (2023b: 19) who observes that the "emergence of broader and more inclusive mechanisms for holding major international institutions to account is one of the most striking trends in global governance in recent decades." In light of this, we see a need to think more deeply and systematically about how to act, adapt, and innovate in this context.

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CONFLICT OF INTEREST STATEMENT

Neither author has any conflicts of interest to report.

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ENDNOTES

- ¹We use the terms organizational overlap and (increased) organizational density interchangeably here for stylistic reasons. By organizational density, we mean that specific governance issues are governed by more than one IO that can be studied discreetly.
- ²Bovens (2007) asks these sets of questions in the context of the EU.
- ³<https://www.oneworldtrust.org/accountability.html>.
- ⁴https://www.ila-hq.org/en_GB/committees/accountability-of-international-organisations.
- ⁵Often, the focus has been on holding power wielders accountable to specific domains of international law, or to widely accepted human rights standards. The WTO, the World Bank, and the IMF have received much attention in this respect (Lall, 2023b).
- ⁶We acknowledge that most accountability mechanisms include both forward- and backward-looking aspects. For example, sanctioning of past conduct is often done with a view to changing future behavior. However, we see accountability mechanisms are falling on a spectrum with respect to whether they predominantly focus on past behavior or more actively seek to shape future conduct.
- ⁷<https://news.mongabay.com/2016/02/survival-international-files-a-formal-complaint-against-wwf-for-allegedly-violating-the-human-rights-of-baka-pygmyies/>.

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