The London School of Economics and Political Science

**Experiencing accountability:
The impact of the Osmotherly Rules on
the Senior Responsible Owners
of major public projects**

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Declaration

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Abstract

Accountability is a characteristic of being a senior civil servant. Calls for them to be more accountable make assumptions about the causal mechanisms that link it to behaviour, and about how these officials experience and manage multiple accountability relationships. Despite the importance of accountability within the public sector there is limited investigation into these assumptions, or how it feels to be accountable from the manager's perspective. My research uses in-depth interviews with 47 senior officials to investigate their experience of being accountable. The narrative around the problems affecting major public projects in the UK includes the demand for increased accountability of their Senior Responsible Owners (SROs). Recent changes to the Osmotherly Rules, which provide guidance for civil servants giving evidence to parliamentary committees, have created a new accountability mechanism for the SRO. They are now expected to account personally to Parliament for the implementation of their project.

The interviews provide an opportunity to investigate how this group of public managers feel about being accountable, how they manage multiple relationships, and their experience of this new mechanism. The analysis shows that they prioritise their account giving activity by assessing the salience of account holders. I propose a typology to illustrate their management of their accountability environment. I argue that being made accountable to Parliament is perceived to have reputational risk for SROs but has not made significant changes to how they feel about being held accountable for their projects. However, it may have a positive impact because of the personal authority it gives them to influence the relationships with their most salient account holders. I show that to understand the effect of adding a new mechanism to a complex environment, it is essential to appreciate how it is perceived by those it is intended to hold accountable.

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Preface

I don't think those demanding more accountability actually

understand how it feels to be accountable [#1] [1]

Sitting in a modern government office in Whitehall, with walls covered in organisation diagrams and project management charts, a senior official pointed through the glass panel at the dozens of staff sitting at rows of desks stretching out across the floor of the department. These were the teams working on various operational activities, and managing other teams spread about this and other buildings. Pointing to another group of desks they explained that this team was dealing with the activities needed to help them manage their role as the individual accountable for a major government project. As the project's Senior Responsible Owner (SRO), they outlined the financial numbers involved with the project, and the timescales, and both were large. The impact on the public would also be far-reaching. Yet it was only when listening to an explanation of all the individuals and organisations who expected a report or explanation about the project that the enormity of the concept of being *accountable for a major project* became apparent.

Almost everyone has an opinion about what *being accountable* means. Few would argue against the need for accountability in the public sector. Clarifying exactly what that means is far from agreed, either within the public sector organisations where it forms a part of modern governance, or within the research literature. The effectiveness of calling for accountability is based on assumptions about how accountability mechanisms work and how being held accountable is perceived by those receiving the demands. There has been considerable research into the subject of accountability but little of it has examined the

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[1] Quoted remarks made direct to the author by civil servants are shown in italics and numbered within the thesis as endnotes, in the format [#xx], to ensure confidentiality. A schedule of the distribution of quotes by the civil servants is provided for the examiners only. For more details apply to the author.

empirical nature of how those in accountable positions feel about being subject to the pressures of multiple accountability relationships, how they perceive them, and how they prioritise and manage them.

The term is widely used within the public sector and this ubiquity can make defining it a challenge (Sinclair 1995, Mulgan 2000, Yang 2012, Schillemans 2013, Hall 2017). Values or mechanism based perspectives are considered within a variety of environments, and the literature embraces a range of definitions and typologies (Romzek and Dubnick 1987, Flinders 2002, Bovens 2007a, 2010). There are many descriptions of different types of account holding entities, and investigations into a range of problems created by too many or too few accountability relationships (Koppell 2005, Halachmi 2014). Various studies describe how accountability mechanisms shape the behaviour of those held accountable (Schillemans and Busuioc 2015, Koppell 2005). However, within this broad range, what is often missing is a consideration of the internal perspective of the actor. How does it actually feel to be held accountable? This lack of empirical investigation has been identified, along with the need to establish how those held accountable prioritise their relationships (Hall, Frink, and Buckley 2017), and how they deal with multiple accountability pressures (Yang 2012, 266). Identifying the institutions to which civil servants feel most responsive, 'regardless of the formal architecture of accountability' has also been acknowledged as a relevant research topic (Uhr 2014, 238). Schillemans (2015) investigated how managers define their accountability and manage multiple relationships but there is limited exploration of the process of prioritisation. This research addresses that gap by asking one group of public managers to explain how it feels to be accountable, and how they deal with the multiple account holders that vie for their attention.

Governments undertake a variety of activities to implement their policies. Their ability to demonstrate competence depends to a large extent upon the progress of the major projects they initiate. In the UK these projects are led by civil servants and involve commitments to

invest £442 billion in activities undertaken by 16 departments and arms-length bodies[2]. They

are not without their problems and when projects such as Universal Credit, the Future Aircraft

Carrier, or the Broadband Delivery Programme run into difficulties they make national news

headlines. Politicians and the media often react by calling for increased accountability from the

civil servants leading these initiatives (IFG 2012). Those officials are the Senior Responsible

Owners (SROs) of the projects. A new accountability mechanism has been introduced to give

effect to these demands. This is the revision of the Osmotherly Rules which provide guidance

to officials giving evidence to Parliament, and which now draw the SROs into a direct

accountability relationship with parliamentary committees and expose them to a level of

scrutiny previously reserved for departmental permanent secretaries.

The accountability of public officials has been studied across many environments and at

various levels within the public sector. For most of these officials their accountability is an

assumed or implicit part of their role as a manager. Unusually, the SROs being studied here

have a job description which not only includes the word, but which attempts to describe their

accountability. These appointment letters are accessible online. These are high profile and

visibly accountable roles and the projects are of national importance. The published job

descriptions define the SRO's accountability and this means that *being accountable* forms a

specific and significant aspect of their role.[3] They have institutional relationships with many

account holding individuals and organisations across government, and these relationships

structure the environment in which the SROs operate and influence their behaviour. However,

they are not passive recipients of accountability mechanisms. They are not only operating

within an accountability environment, but they also help to shape it, and they modify their

behaviour to manage and exploit it. The introduction of a new mechanism provides a specific

opportunity to explore how they feel about being accountable in general, how they manage their

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[2] Figures from the Infrastructure and Projects Authority 'Annual Report on Major Projects 2018-19'. (IPA 2019a)

[3] The nature of this description and how it is interpreted forms part of the research.

multiple accountability relationships, and how they integrate a new and significant mechanism into a complex accountability environment.

This research examines the impact of the new Osmotherly mechanism from the perspective of the SRO. To understand why these officials act in the way they do, as Weller (2014, 336) notes, understanding how they see the world is a 'crucial prerequisite'. To appreciate how they manage the multiplicity of accountability relationships it is necessary to determine how they perceive them, and then how they prioritise them. As Heclo and Wildavsky (1981, lxiii) note, to understand how something is done, talk to those who do it, and then think about what you have been told. It is not easy to negotiate research access to civil servants in the centre of British government departments and this has limited the number of studies, but interviews have been used to explore their perspective of working within Whitehall (Page and Jenkins 2005, Rhodes 2005, Heclo and Wildavsky 1981). They have also been used to determine how public managers in the UK and elsewhere define accountability (Sinclair 1995, Lupson 2007, Schillemans 2015). The aim here is to move beyond asking civil servants for conceptions of accountability and to specifically ask *how it feels to be accountable* within a Whitehall context, and how they manage their multiple relationships.

I use 47 in-depth interviews with SROs to explore their perspective. The selection of this approach and the methodology are explained in detail in the annex on research design and method. Drawing on these interviews, the empirical analysis examines the way they evaluate their accountability, their assessment of the salience of those entities attempting to hold them to account, and how they manage this complexity. Their perspective of the specific new mechanism is then evaluated against that background. I present their personal descriptions to illustrate their challenges, and the approaches they use to cope with them.

This *felt* accountability is based on the officials' perceptions of accountability rather than the attributions of accountability that an external observer may infer (Yang 2012, 271). In an examination of 15 Australian managers' descriptions, Sinclair (1995, 232) distinguished between the structural discourse of accountability, where it was described as a technical and rational activity, and the personal discourse, where it was something they 'uphold and fear,

something about which they feel both anguish and attachment as a moral practice.' This personal aspect provides an insight into the ways in which managers deal with accountability pressures. Understanding how SROs react to their environment, and how they feel they influence it, addresses the question posed by Yang (2012, 266), 'empirically, how exactly do actors of governance perceive, order, and deal with multiple accountability pressures and why?' To achieve this, the interviews address three areas. The first is how these SROs make sense of their accountability environment. The second is how they feel they manage the accountability arising from multiple forums.[4] The final aspect is how they feel the changes in the Osmotherly rules have affected their roles and behaviour. My examination of how the officials feel about being held accountable, and how they consider the impact of the new mechanism, are brought together in the research question, *'how do SROs understand and manage their accountability environment, and what is the impact of the new Osmotherly mechanism?'*

The first two chapters provide the setting for the five chapters of empirical investigation. The process I adopted to assess the SROs perspective and to make sense of their descriptions is described in the annex. I address the concept of accountability in chapter 1 and highlight the limited empirical research into how it feels to be held accountable in these environments. In the second chapter I describe the background to the UK government's major projects and the role of the SRO. The SRO role itself was originally introduced as an accountability mechanism to improve departmental project performance.[5] The following five empirically based chapters cover a parsimonious series of themes from the output of the interviews and the analysis of the SROs comments. By focusing on how it feels to be accountable rather than searching for the officials' definition of the concept, the SROs accounts can be used to build a rounded internal perspective on how they experience accountability in their environment. I use quotations from the interviews to allow their voices to provide the evidence to support the arguments I make.

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[4] Bovens (2007) uses *forum* to represent the account holder. I have also used *claimant* as an alternative term. Both terms, forum and claimant, were used in the interviews and are used within this thesis, with specific use of one or other being determined by the context.
[5] Following a recommendation in a review of government projects published in 2000.

In chapter 3, I describe the officials' general perceptions of the role of SRO, and their attitudes towards scrutiny, blame, and reputation. When considering the relationships, they recognise the differing importance of the entities that may hold them to account. Building on this general outlook, in chapter 4 I examine how they assess the salience of these forums and then chapter 5 categorises those various forums within a proposed typology. Drawing from stakeholder theory (Mitchell, Agle, and Wood 1997, Freeman 2010), I propose a model of forum salience which describes the key attributes assessed by the SROs. In chapter 6 I explore how they manage their multiple forums to bring some form of order to their account giving behaviour. Having assessed the forum's salience, there are two primary coping strategies. They either bring forums together to achieve agreement and coherence on their differing expectations, or use their own experience and expertise to prioritise their account giving responses. Some use a combination of both approaches. A few are less strategic and respond to demands as they arise and some attempt to offload part of their accountability, often to other SROs.

From this analysis a comprehensive internal perspective emerges against which to examine the impact of the new mechanism. In chapter 7 I show how the new mechanism has an effect across a variety of existing relationships and how the perception of the SRO may differ from the assumptions of the account holding forums or the external observer. Their assessment of pertinent forums provides evidence that forum behaviour, and in particular the theatrical nature of some parliamentary scrutiny, has an impact on the approach adopted towards managing both the new mechanism and their other accountability relationships.

I argue that the new mechanism has had an impact, but not in the way it may have been intended, and not in the way it may appear externally. The new Osmotherly mechanism is a significant increase in the perceived accountability of the SRO and there are three separate perspectives on the intent and the outcome of this new relationship with parliamentary committees. It is described as either being to hold SROs accountable for project delivery, or to hold their departments accountable for defining the projects more realistically and pragmatically, or to enable the SRO to hold others accountable in order to get clarity about their expectations for the project. The mechanism's implied sanction of being called to appear at a

parliamentary committee does not necessarily make the SRO feel *more accountable* for their project outcomes, but it may empower the SRO to hold others to account and thereby provide clarification of the complex accountability environment. This may be at odds with the general perception of those who perceive it as a mechanism applying additional pressure on the SROs to be more diligent.

Chapter 8 then draws the empirical strands together and I consider the consequences of this research for accountability studies. Numerous explorations of accountability describe the difficulty of dealing with multiple forums and the challenges in attempting to define the accountability of a public manager. Few have explored the empirical perception of the individuals held accountable to consider how it feels to be in those situations. This research shows that even in roles where their accountability is ostensibly defined in their appointment letter, officials can still face a complex web of competing relationships that extend well beyond the principal task delegating forums. I suggest that they interpret these complex environments by a largely intuitive process of assessing the salience of account holding forums. They prioritise their response based on this salience or bring the forums together to achieve clarity and agreement on their expectations.

This research has consequences for accountability studies. It directly addresses the gaps in empirical knowledge described by Yang (2012) and Hall, Frink, and Buckley (2017) and it confirms the importance of reputation within accountability relationships, as described by Busuioc and Lodge (2016). It also supports the findings in Schillemans' (2015) examination of how public managers manage their accountability. The approach developed here for assessing the salience of forums can be applied to any situation with multiple account holders. Where accountability is often regarded as exogenous to actors, it illustrates the importance of considering an endogenous approach. Whilst the context here was specific, I argue that in general, to understand the effect of any new accountability mechanism it is necessary to understand the environment into which it is introduced, and particularly from the perspective of the individual to whom it is applied.

Chapter 1. Investigating Accountability

There is hardly any aspect of our lives that has not been touched by the growing obsession with accountability. [6]

Some of the legislation is complex, so implementing it is complicated. My feeling having been here, although not for long, is that I find enormous difficulty in identifying where my accountabilities lie, and who is entitled to hold me accountable for what. It's not about what I should be doing on a day-to-day basis, but really why am I here? [#2]

These two opening remarks express the challenge that lies behind an empirical exploration of accountability. It is a widely used concept, and proclaimed throughout the public sector, and yet for those being held accountable it can be extremely difficult to establish what that means in practice. In the event of poor performance in a government project, the call for someone to be *held to account* is an almost immediate response by the public, politicians, and the media. The demand is particularly evident when there is a search for someone to blame (Hood 2011, 4).   In the public sector, this demand for accountability, directed at both elected officials and civil servants, often frames accountability in a pejorative context where lack of accountability is seen as a bad thing. Commentators, government inquiries, and audit bodies frequently raise these concerns. A list of such demands is not difficult to compile, and three examples illustrate the topic. Calls for 'better accountability' when funding problems were reported to have had an impact on NHS staffing and social care (Lock 2017). An inquiry into failed procurement of rail services by the Department for Transport, which was 'extremely uncomfortable reading for the

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[6] (Dubnick 2014a, 24).

department', recommended strengthening accountability (www.gov.uk 2012, IFG 2012). The National Audit Office (NAO), in a review of government spending, expressed concern that senior civil servants were failing to hold ministers accountable about the spending within their departments (PSE 2016, NAO 2016). Whilst the media are often at the forefront of such demands they also recognise the relevance of accountability 'because it matters that powerful individuals are held to account for mistakes' (The Guardian 2019).

Demands for *better accountability* and expecting improvements in the performance of a project represent 'the idea of accountability as the solution to a wide range of problems' (Dubnick 2005, 376). Or it may be anticipated that *improved accountability* will prevent reoccurrence of an adverse event or provide an improvement in a service (Burgess, Burton, and Parston 2002, 1). Accountability, however, is often 'more mantra than panacea' (Tetlock and Mellers 2011, 542). There is generally little clarity about what exactly is meant by more or better accountability. These calls for *more accountability* to solve a public sector problem reflect Dubnick and Yang's (2011, 172) description of the 'almost indiscriminate reliance on the use of the instruments associated with the polymorphic accountability toolbox.' Simply calling for more accountability is in danger of chasing a 'dead metaphor' (Tsoukas 1991, 568), no longer accompanied by a clear definition of why, for what, or to whom. Without being clear about their impact, these calls frame accountability, much like Power (1996, 308) describes *auditability*, as a 'concept which is appealed to more than it is understood.'

There are two parts to an evaluation of the impact of calls for public officials to be more accountable. At the conceptual level this involves considering the aims, objectives, and mechanisms of accountability processes.   Then empirically it involves understanding how these processes act in practice and examining their effect on those held accountable. Gaining knowledge of precisely how accountability is interpreted and understood by those held accountable is therefore important, as is their understanding of the impact of new mechanisms. This is not a simple task. Mapping the accountability environment of officials requires an understanding of how these relationships are perceived and then managed by those involved.

The civil servants tasked with accountability for the largest public projects have recently been thrust into an accountability spotlight. The origin of these roles and the nature of the major project environment is described in chapter 2. These individuals already face a plethora of account holding bodies and must manage within a 'web of accountability' (Page 2006, 166, Schillemans 2015, 433). Understanding how they perceive calls for them to be even more accountable, and how they respond as a result, can demonstrate the impact of the accountability signals they receive (Patil, Vieder, and Tetlock 2014, 83). The intent behind this research is to look beyond the newspaper headlines, or the National Audit Office reports, and to consider how these civil servants feel about being accountable, from their own perspective. Understanding how their perspective affects how they behave is crucial to appreciating how accountability works in practice.

1.1 The challenge of defining accountability

When considering accountability, the term is in such widespread and indeterminate use that before addressing how civil servants perceive it, I will first position the concept within this particular context by considering its history and its overlap with near synonyms. Turning to the current literature I can then explore the lack of empirical evidence about the way senior officials perceive their accountability and why this research is important. I will then explain why I have adopted a particular definition of the concept for the fieldwork, based on the framework described by Bovens (2007a), and describe the creation of a schematic to facilitate discussions with officials in the public project environment. The intention is not just to put the concept's breadth and scope into a historical and research context, but to explain the need for attention during the interviews and analysis to be alert to the range, complexity, and confusion of related concepts when in use by practitioners.

Accountability is a word used extensively within the public sector but exactly what it means is not easy to pin down. It appears regularly in relation to governance, control, and responsibility across many institutions. It has been described as 'pervasive in public life' (Pollitt and Hupe 2011, 642) and 'ubiquitous in public management' (Yang 2012, Schillemans

2013, Hall 2017). It 'crops up everywhere performing all manner of analytical and rhetorical tasks' (Mulgan 2000, 555). The concept's origin, its widespread use, and its conflation with a range of synonyms, result in a broad range of working definitions and typologies. In practice, its use is obscured by the numerous descriptions found across social psychology, accounting, public administration, political science, international relations, and constitutional law (Bovens, Schillemans, and Goodin 2014, 4-6). This frequent appearance in analysis of public and private sector institutions 'reflects its problems as much as its importance' (Dubnick and Yang 2011, 171). It is not only the ubiquity of the concept that makes defining it a challenge. There is considerable debate about the constituents of accountability with no universally agreed or unified description.

Origins, synonyms, and usage

Over the last 30 years, accountability has maintained a position as a fashionable buzzword (Bovens, Goodin, and Schillemans 2014, 1, Day and Klein 1987, 1, Mulgan 2003, 1) and as a cultural phenomenon (Dubnick 2014a, 25). Pollitt and Hupe (2011, 642) describe it as a 'magic concept' along with others such as *governance* and *networks.* They use the term to define concepts which have the attractive rhetorical properties of 'broad scope, great flexibility and positive *spin*', which can explain their wide-ranging and pervasive usage and their popularity amongst practitioners. Their *broadness* covers huge domains, has many synonyms and conflicting definitions, and overlaps with other concepts. The *normative attractiveness* gives the term a general positive connotation. They contain an *implication of consensus*, which enables the dilution of conflicting concepts. Accountability is fashionable and adopted by practitioners in both literature and general usage. These characteristics reflect the overlap between accountability and its common synonyms.

The concept of being held to account is an old one. Although creating the abstract noun 'accountability' by adding a suffix to 'accountable' may be a recent development, the historical use of 'to account' or 'to be accountable' is evident from early texts. The idea of being called

upon to 'give an account' was well established by the 18th Century. Johnson's English

dictionary (1755/1990) includes the following explanations, which are recognisable today:

> '**To Acco'unt**. v.a. [See ACCOUNT.]
>
> …3. To give an account, to assign the causes; in which sense it is followed by the
>
> particle *for*.
>
>> If any one should ask, why our general continued so easy to the last? I know no
>>
>> other way to *account for* it, but by that unmeasurable love of wealth, which his best
>>
>> friends allow to be his predominant passion.   *Swift.*
>
> **Acco'untable.** *adj*. [from *account*.] Of whom an account may be required; who must
>
> answer for: followed by the particle *to* before the person, and *for* before the thing.
>
> *Accountable* to none, But to my conscience and my God alone.   *Oldham.'*

The use of the term has increased as systems of management have developed. In an

examination of its appearance in a million published English texts, Dubnick (2014a, 24) found

that 'it remains a culturally innocuous term until the 1960s and 1970s, when we start to see a

sharp and significant upturn in its usage.' Mulgan (2003, 6) observed that until the 1980s the

term was mostly restricted to financial accounting. As accounting and audit processes have

spread across public management since the 1980s, the term has seen a similar pattern of

distribution. This can be observed in the use of the term within political debate. Reviewing its

use in Parliament (Hansard n.d.), there are almost 35,000 occurrences during debates in the

Commons and Lords. There were no recorded instances before 1812 and then the average use

was less than once a year before 1900.[7] Using data from the Hansard online archive of

parliamentary proceedings, figure 1 shows the average use by decade since then. It occurs more

regularly in the Commons than the Lords over this period, and it becomes a regular topic in

Parliament from the 1980s onwards.

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[7] Lord Grenville's statement on The King's Household Bill was the first record in Hansard on
the 7th February 1812.

Figure 1.1 Instances of *accountability* as a term used in parliamentary debates
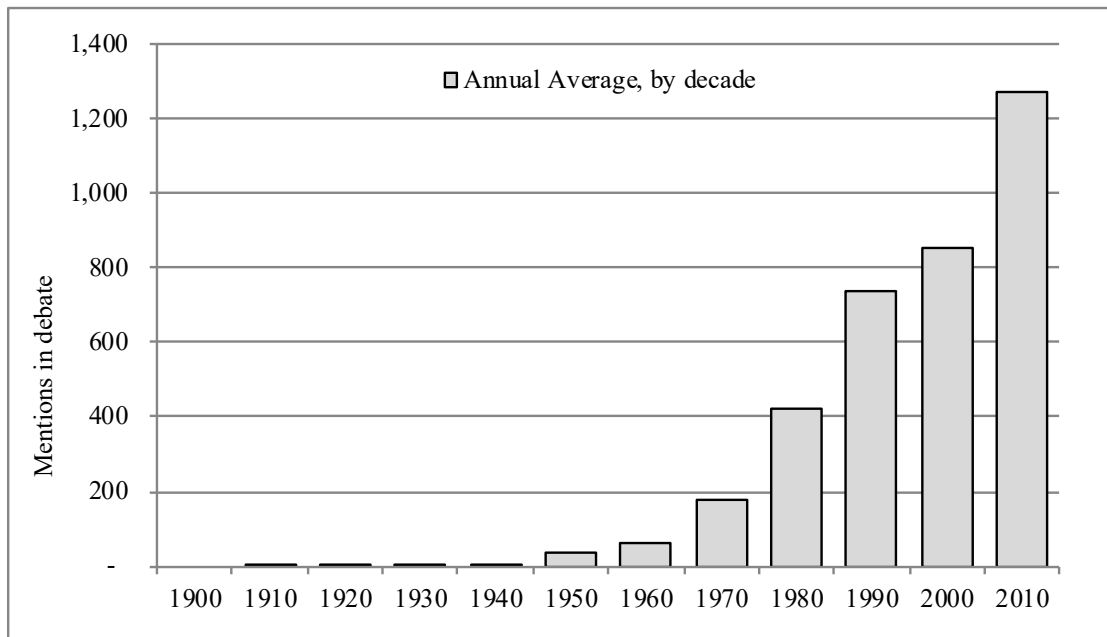
Data from Hansard Online Archive, 1900-2020 (Hansard n.d.)

The rise in its use, initiated by its links to accounting in a financial sense, developed alongside the expansion of budgetary responsibility as new approaches to management were adopted in the UK public sector. This transition during the 1980s is described as running 'parallel to the introduction of New Public Management' (Bovens 2007a, 449). But the sense of being called to account to answer for one's actions, as recorded by Johnson in the eighteenth century, is still the way the term is generally described in the UK. The National Audit Office (2016, 12) defines the concept as:

> 'Accountability essentially involves being responsible or answerable to someone for some action. It can involve giving an account of your actions to someone (for example, through a reporting requirement), or being held to account for your actions (such as a select committee questioning officials about departmental performance in a formal evidence session). The purpose of accountability can be to provide assurance over an activity, identify who is responsible if something goes wrong, or enable redress to

affected parties. It is also essential to identify recommendations and improve future

decisions.'

Although this may appear a simple description, it has not constrained the broad use of the term,

as is clear from the range of things expected of the concept.

<u>What should *accountability* provide?</u>

Within American academic discourse accountability is generally considered as normative

behaviour which is desirable in public sector officials. Elements of control, ethical behaviour,

performance, integrity, legitimacy, and justice are regarded as the promises implied 'in the

application of accountability-based solutions to problems' (Dubnick and Yang 2011, 171).

Being accountable describes a virtue and is close to responsiveness and transparency

(Schillemans and Bovens 2015, 4). The UK and European approach predominantly use the

historic context of giving an account, and the sense of a mechanism created by a social

relationship between an account holder and account giver.   The new relationship between

officials and Parliament, created by the revision of the Osmotherly guidance on civil service

evidence to committees, is an example. In searching for conceptual clarity, Flinders (2008, 170)

identifies possible expectations of the concept in his consideration of delegated governance

arrangements in the UK:

'1. *Prevention* of abuse, corruption, and misuse of public power;

2. *Assurance* that public resources are being used in accordance with publicly stated aims

and that public service values (impartiality, equality, etc.) are being adhered to;

3. *Improvement* of the efficiency and effectiveness of public policies;

4. *Enhancing* the legitimacy of government and improving public trust in politicians and

political institutions;

5. *Lesson learning* and preventing the recurrence of past mistakes;

6. Providing a fulfilling or *cathartic or healing* societal function; and

 7. Achieving *clarity* in terms of where errors occurred within complex policy networks

Each of these statements exhibits the normative attractiveness described by Pollitt and Hupe. The problem with collections of objectives, like Flinders' list, is that any accountability regime may achieve some aspect of one or more of these, but as he notes, they are unable to meet all of them. Bovens (2007a, 455) describes a further difficulty with the 'problem of many eyes', recognising that public institutions and their managers 'are accountable to a plethora of different forums, all of which apply a different set of criteria.' This is a significant challenge, but there are further problems for officials in an environment where the term is so widespread.

It is not only the many potential objectives that make it difficult to define accountability. The differences between accountability and its synonyms are often blurred when the terms are used by the media, politicians, and the public. What exactly does it mean when ministers calling for more accountability from civil servants use statements such as 'accountability of existing project owners is being strengthened' (IPA 2016, 1). Could it be responsibility, transparency, or responsiveness? The term is used as a synonym for related concepts such as clarity, involvement or deliberation (Bovens 2010, 949). It is used interchangeably with ethics and obligation (Kearns 1996, 7,10, Donahue 1989, 10) or with the concept of responsibility or control (Bovens 2007a, Harlow 2014, Jackson 2009, Mulgan 2000, Simon 1991, Uhr 2014). Mulgan (2000, 556) notes other uses, such as accountability as responsiveness or dialogue. Bevir and Rhodes (2003, 133) observe the problems inherent in the confusion of accountability with responsiveness or responsibility. The overlap between accountability and its synonyms is not perfect and each has particular aspects that are conceptually distinct. These differences are often lost when the terms are found in general use, when accountability can encompass a variety of these concepts.

During the interviews, participants frequently referred to responsibility, control, and transparency when describing their roles. Accountability and responsibility are terms often used interchangeably. Responsibility also has a wide range of interpretations and would meet Pollitt and Hupe's description of a 'magic concept'. The principal difference is that accountability involves a concern for some form of external scrutiny and where an account must be given, whereas responsibility has a sense of action free from that specific obligation to account.

Control reflects a principal's power over an agent and encompasses a whole range of mechanisms used to direct and influence both ex-ante and ex-post. Direct control by a principal, through orders, direction, or incentives, differs from accountability, which has an inherent requirement to explain the actions taken. Control lacks the sense of an actor having to account and explain their actions. Responsiveness lacks the sense of external pressure inherent in control and the obligation to report inherent in accountability. Another 'magic concept' is transparency, which Meijer (2014, 510) describes as 'the availability of information about an actor allowing other actors to monitor the workings or performance of this actor.' Whilst important within accountability relationships, this has a more passive sense than that inherent in being personally called upon to give an account.

This overlap of accountability with related concepts is also evident in terms such as dialogue, where it forms part of the social activity of delivering an account. I support Mulgan's (2000, 569) assertion that these terms, which form part of the description of accountability or where accountability is part of their description, are best thought of as concepts *tethered* together in their use rather than as overlapping synonyms. This pursuit of clarity, recognising the semantic boundaries of the terms, becomes relevant when analysing the interviews and interpreting the descriptions of how it feels to be accountable.

My intention in describing the historic development of the term, its objectives, and its synonyms, is to show that the term was in widespread and common use long before it became of academic interest, and that this use continues within a blurred domain of synonyms and associated concepts. Its development over the past few decades has seen it used to fill a variety of governance purposes across the public sector. The range of objectives which it is expected to fulfil is consequently broad and potentially contradictory. Given this complexity it is not surprising that Dubnick and Yang (2011, 177) note that the 'analytic and empirical challenge can only be resolved by a process of defining and operationalization that focuses and narrows one's view of the object under study.'

Reflecting that process of defining and narrowing, to develop a meaningful understanding of the term accountability as used by the interview participants, it is helpful to

have both an appropriate description of the concept but also a realistically broad consideration

of the associated words used in conversation. It was evident in my discussions with civil

servants that they rarely had a fully defined interpretation of the terms in mind, even when they

form part of their job description. There is also little distinction drawn by the officials between

executive, *administrative*, or *managerial* accountability, when they describe their environment.

When analysing the fieldwork, I recognised Kearns' (1996, 9) suggestion that adopting a

broader view of the concept 'is more meaningful to professionals, trustees, elected officials, and

others who wrestle with these problems on a daily basis.' Consequently, in seeking to

understand how the participants perceive their accountability it was necessary during the

research, both in interviews and analysis, to be alert to the scope, complexity, and confusion of

the concept and terms.

1.2 Theoretical perspectives

The study of accountability in public administration has created an extensive literature

on the concept and its definition. Reviews of the literature (Yang 2012, Schillemans 2013)

describe the breadth of theoretical, conceptual and empirical studies.   Yang focuses on studies

of public administration, noting that 'all major debates about government reforms are related to

accountability' (2012, 257), although it is largely United States based and therefore concentrates

on accountability as virtue rather then mechanism. Schillemans' review broadens the field to

include more European works and other disciplines such as political science and social

psychology.   Evident within the reviews was the frequent reformulation of the definition of

accountability. Studies within behavioural science have also explored the impact of

accountability on personal perception and behaviour.

It is not surprising that studies of accountability describe its widespread use (Dubnick

and Yang 2011, Hall and Ferris 2011, Mulgan 2000), its normative attractiveness (Bovens

2007a, Koppell 2005), and its contextual nature. Within the public administration literature

there is considerable attention to the types of accountability (Bovens 2007a, 2010, Koop 2014,

Olsen 2013, Romzek and Dubnick 1987, Romzek, LeRoux, and Blackmar 2012, Schillemans

2011), and its challenges or failures (Flinders 2008, Koppell 2005, Schillemans 2013, Willems and Van Dooren 2012, Yang 2012). Alongside concerns about the breadth of its meaning and application (Flinders 2011, Mulgan 2000, Lindberg 2013), a consensus has developed around core elements of accountability as a relational concept (Bovens, Schillemans, and Goodin 2014, 3), with characteristics described by Bovens (2007a). When considering the research question, the different literatures covering agency theory, social contingency based on social psychology and behavioural science, and reputation theory, all provide insights into the activities of the SRO in responding to their accountability environment.

Principal-Agent and Stewardship theory

The core relationship within accountability is usually considered to be that of an agent being held to account by a principal, such as a senior civil servant being held to account by their permanent secretary or minister. The exercise of power between the forums and SRO is a significant aspect of the accountability relationship (Mulgan 2003, Pitesa and Thau 2013, Thynne 1987, Uphoff 1989). Although not all the account giving relationships which form the empirical basis of this research would necessarily match this description at first sight, the relationships are frequently about recognising the power of the forum to judge and to apply consequences. Agency theory provides a broad framework for analysing the various institutional arrangements that form these relationships. However, there is no single principal-agent model that describes the wide variety of relationships encountered and it is fittingly described by Gailmard (2014, 91) as a 'family of models addressing related concerns.'

Accountability relationships create various mechanisms, ranging from informal conversations, written reports, inspections and audits, through to appearances at select committees. Information asymmetry between principal and agent in these relationships can lead to *moral hazard* or *adverse selection*. The leaders of projects are in specialised roles and will be better informed than those holding them accountable, and so the relationship may be designed to limit their ability to behave in a self-interested manner. The role of accountability

mechanisms and institutions will be to limit agency loss and any operational form of 'bureaucratic drift' (Kam 2000, 367).

Descriptions of accountability based on hierarchical descriptions of single principal environments and using agency theory over simplify the situation, attach a more negative perspective than justified to the actions of the agent, and are not fully supported by empirical investigation (Schillemans 2013, 17, Döhler 2016). Using a principal-agent approach to describe the chain of delegation from voter to bureaucrat Strøm (2000, 268) only partly recognises the complexity that faces the official in a parliamentary democracy. The project official faces more than one potential principal. In a complex environment, accountability may be better understood in terms of the way in which the agent manages the many diverse expectations placed upon them from both inside and outside their organisations (Romzek and Dubnick 1987, 228). There are a variety of negative consequences which arise when an agent faces many principals (Schillemans and Bovens 2015, 6, Koppell 2005). The existence of multiple principals, or common agency, does not negate the value of considering individual relationships, as Gailmard (2014, 91) notes 'each principal is doing its best, with whatever tools it has, to induce a favourable reaction from bureaucratic agents, taking as a given that each other principal is trying to do so as well.'

Discrepancies exist between the expectations of principal-agent theory and the experience of the agents here, with SROs highly committed to their role yet some of their principals much less interested, or enthusiastically sharing information and positively soliciting accountability. These match descriptions by Schillemans and Busuioc (2015, 200) of observed divergence between agency theory and practice. An alternative to the principal-agent model is stewardship, which recognises the role of agent acting more positively than the self-interested agent needing to be under control that is anticipated in agency theory. An SRO, attempting to make sense of multiple accountability pressures, and acting as steward of the project on behalf of the department, may be acting in the 'organisationally centred' manner described by Davis, Schoorman, and Donaldson (1997, 25). Similarly, stewardship more accurately reflects the situation with SROs motivated to achieve broad organisational objectives, like those public

servants described by Bundt (2000, 760) when addressing professional accountability. That is not to propose the absence of agency based relationships, but it is necessary to see the network of account holders accepting a mix of stewardship and agency approaches.

Many of the forums that demand accountability would not fit the traditional definition of a principal as they do not place their 'assets or powers under the stewardship of the agent' (Schillemans and Busuioc 2015, 206). They demand an account about an aspect of their interest, but after the delegation of the task by the meaningful principals such as a permanent secretary or the Treasury. In this case the forum may not benefit directly from the actions of the agent, despite an interest in monitoring, and a form of principal drift occurs. Understanding the nature of the forum is essential as they can induce different expectations. As I will show in chapter 4, civil servants carefully assess their account holding forums, in their own role as agent or steward, to be able to respond to these different requirements.

The complexity of the accountability environment faced by public officials is recognised as a 'web' of relationships (Page 2006) and this 'quasi-anarchically structured web' increasingly gives rise to concerns about inefficient and ineffective arrangements (Schillemans 2016, 1402). As with many of the reviews of failures of accountability, studies of these challenges are usually focused at the organisational level rather than the perception of the agent. An alternative perspective is available within the behavioural science and social psychology research. These approach accountability from the individual's standpoint and investigate how they respond to the expectation of being held accountable or required to justify decisions or behaviour. Like the public administration literature, they have 'various conceptualizations of accountability which have elements in common, although they also have some points of difference and others of unclear connectedness' (Frink and Klimoski 2004). They usually take a broadly similar view of the definition of accountability to that described by Bovens as a relational concept with a communicative core, and an expectation of having to give an account.

Social contingency and behavioural public administration

The social contingency model, with its roots in social psychology and experimental work (Lerner and Tetlock 1999, Tetlock 1992), asserts that no single approach to accountability fits all situations and that social context will have a major impact on its application and effectiveness. This focuses on accountability as a bridging relationship between an individual and forum, with behaviour influenced by the social environment. The expectation of having to account for one's behaviour and actions has an impact on how those actions and decisions are made. The SROs network of relationships influence their response to being held to account, and different accountability institutions have different effects on their behaviour. The elements include whether the interests of the prospective audience are known or unknown, whether they are being held to account routinely or perhaps after a particular problem has been exposed, and how difficult it may be to reverse any action, particularly if already made public (Tetlock and Lerner 1999, 572).

Tetlock and others have addressed cognitive aspects including the types of accountability that foster precision in judgements, how account-giving is influenced by timing, and the political leaning of the audience (Tetlock et al. 2013), or whether the focus is on process or outcome (Patil, Vieder, and Tetlock 2014). Process accountability seeks to incentivise 'best practice', although the counter argument is that it may then be inappropriate to hold officials responsible for outcomes beyond their control. Outcome based accountability uses pressure or sanctions to ensure officials find ways to bring outcomes under control. Using an outcome basis may prevent SROs claiming that they did all they could within organisational best practice, despite not achieving appropriate results. Many of the SROs' relationships appear to be what Patil, Vieder, and Tetlock (2014, 69) describe as 'evolving process-outcome hybrids that lean in one direction or another', with context determining the weighting. Cognitive experimental work has identified that the effects of accountability are not confined to how agents cope with mechanisms, but also address how they think and make decisions in accordance with prevailing norms, or else provide justification for not doing so. Anticipation and subsequent consequences can have a major impact (Hall, Frink, and Buckley 2017, Lerner

and Tetlock 1999). Individuals seek approval within their communities for both intrinsic and extrinsic reasons, and the identity of the relevant audience from which they seek approval is particularly important. They adopt various coping strategies to enable them to maintain that approval whilst managing their accountability environment (Schillemans 2015, 433).

Whilst these social psychology studies can provide insights into how individuals perceive their accountability they are largely focused on experimental populations rather than within an active organisation. They consequently ignore the complexity of multiple accountability signals from a wider account holding environment like that faced by the SRO. The approaches are helpful, but as Tetlock comments about experiments 'one can observe the phenomenon in detail' but there is an 'inability to view the phenomenon within a broader systems context' (1992, 332). Insights from the behavioural public administration perspective can highlight aspects of the SROs situation (Grimmelikhuijsen et al. 2017, Nørgaard 2018). It would be valuable to understand the SRO's response to multiple organisationally-situated accountability signals from the perspective of psychology and the behavioural sciences, at the micro-level (Grimmelikhuijsen et al. 2017, 46). Or to establish which of Downs (1967) simplified models of bureaucrat matched the various SROs; *climbers, conservers, zealots, advocates* or *statesmen,* and consider if this affected their response to being accountable, and under which circumstances. At a superficial level it seemed likely that my research participants included at least a number of *zealots* and *advocates*, from Downs' typology. Similarly, Hall et al. (2004, 532) examined accountability, reputation, and leadership behaviour and proposed a future research path examining the leader's substantive or symbolic accountability. This would be an interesting field to explore, building on the results of my research, and in relation to the public performance of accountability which will be discussed in Chapter 7. However, these perspectives are not essential to an initial appraisal of the SRO's process of identifying and prioritising the salient accountability relationships and are considered beyond the scope of this research.

An aspect of the social psychology field which is explored here is the discussion of process or outcome-based relationships. The questions about the primacy of the way something

is done, as opposed to what outcome it provides, and the behaviour of the agent in responding to a particular forum, reflect the focus and authority within a specific accountability relationship. Nor should outcome-process primacy be regarded as static within any relationship.

> *Part of the challenge with being accountable is that it's outcomes that matter to the department rather than processes, unless a problem with process occurs, when that immediately changes their priorities.* [#3]

Accountability is contingent and domain specific. Whatever the nature of the forum, there are likely to be problems for an official trying to meet the 'legitimate, but competing, institutional demands' it makes (Bovens 2007a, 455).

An institutional perspective can provide a further direction from which to examine the behaviour of the SRO (Olsen 2013). There was a consensus across the SROs about their perceptions of the various forums and their approach to managing them. There are differences in institutional culture between departments and this could affect attitudes within different types of project, or between departments, although this was not evident in the SROs commentary. They were reflected in the different structures of account holding institutions within departments which may be evidence of path dependency in the departmental governance models (Christensen and Lægreid 2007, 1062) despite Cabinet Office attempts to apply a unified approach to major projects across government. The extent to which the SROs are constrained by institutional and behavioural norms, both in the assessment of forums and in their response, was not explored but could build on my work here.

Reputation and blame

An important part of an accountability relationship is what happens when things go wrong and there is some form of failure. Assigning blame, or credit, to individuals for observed events is a part of many of the consequences inherent in accountability mechanisms (Anderson 2009, 327). When discussing their roles, officials made frequent reference to reputation and blame. Hood (2011, 5) proposes that a significant aspect of the behaviour of accountable individuals is related to 'blame risk' and avoiding blame 'shapes the conduct of office holders' (p. 4). Identifying

how officials perceive and respond to blame risk, and its impact on their accountability relationships, provides an insight into the way some mechanisms affect their behaviour. Blame avoidance behaviour could be expected within the SRO community, given the public exposure these individuals have within their environments, and the complex and difficult nature of their projects. The prospect of being blamed was frequently mentioned in an abstract manner and may form part of their intuitive assessment of forum salience. However, I didn't specifically investigate blame avoidance, or the institutional factors and actor orientations which influence them.

The SROs were careful in their interaction with forums and blame avoidance could be expected as part of that behaviour. Whilst they describe being in an environment where blame was a likelihood, and it could feel like being blamed when questioned by forums, few described being blamed for anything serious within their SRO roles. Nor did any SRO expect to publicly blame their ministers for inappropriate intervention in projects, although they recognised their new accountability relationship invited them to do just that. The careful behaviour of SROs when being interrogated at a parliamentary committee meeting may represent the visible display of the *public service bargain* described by Hood and Lodge (2006). The SRO's exposure to blame is described in chapter 3 but more detailed research in this direction, and potential changes to the public service bargain between SRO and minister, was not pursued. It would be relevant for a future study as more SROs are exposed to public scrutiny and criticism in parliamentary committees.

More evident in the discussions was the SROs concern for personal, project, and departmental reputation. Officials are influenced by their need for approval within the environment of their departments and the expectation of having to account within a set of norms of behaviour. This includes the SRO's perspective on blame likelihood within the environment and their personal and institutional reputation. Their reputation can influence their response to accountability mechanisms (Laird et al. 2009). Most forums have limited ability to impose sanctions on an official, but loss of reputation, as either a competent civil servant or project leader, was felt to be a consequence if there was a substantial problem with a project. Busuioc

and Lodge (2016, 247) propose that account giving, and account holding, is about 'managing and cultivating one's reputation vis-à-vis different audiences'. This acknowledges the gap between principal-agent theory, and the empirical findings when accountability-relationships are investigated. It could be argued that public statements demanding more accountability from civil servants are designed to portray politicians being *tough* when dealing with failed implementation. This can apply when ministers and officials have to deal with potentially difficult situations.

> *It's clear nobody wanted to be embarrassed, not the secretary of state, their advisors, or civil servants. It was a mess.* [#4]

Evidence from the fieldwork suggests that accountability, between an official and a forum, should be understood as partly motivated by reputation, and as an interdependent relationship. A reputationally based response may be relevant to both formal and informal relationships, and to organisations and individuals. Busuioc and Lodge (2017, 93) take this further and suggest that the giving of an account not only relates directly to the account-holder, but is affected by wider audiences to that relationship. Both parties will be aware of the impact on their own reputation that their co-production of the accountability environment has with those key audiences. Therefore, reputational concerns can be expected to form part of an official's assessment of which forums matter. For many officials, their SRO activities are a minor part of their role. Consequently, their assessment of the important forums for their project may include those with wider reputational impact, concentrating on those which overlap with the rest of their job.

The reputation of the SRO as the 'head of the major project' may be expected to be linked to the reputation of the project itself, particularly if they have been in post for some time. However, as Maor (2016, 85) notes, the institutional and personal operate on different timescales. SROs usually have shorter times in post than the life of the project and so must be aware of the impact of their own performance on their personal as well as organisational reputation. There were SROs who had recently taken over troubled projects and who were

aware that their own positive reputation on arrival would only last a short time. They are aware of many audiences to their activity that could have an impact on their reputation within and beyond their department.

These 'audience-induced dynamics' go beyond the principal-agent perspective and the reputational perspective sees this interaction as 'characterised by complex interdependencies' (Busuioc and Lodge 2017, 94). Senior civil servants and ministers operate in such an environment and the interviews support using personal and organisational reputation as a frame for evaluation. One particularly relevant audience is the SRO's peer group. An appearance at the Public Accounts Committee (PAC) is visible to their peers as these committee meetings are public and televised. These audiences are important and Carpenter and Krause (2012, 27) note that public managers 'are by necessity and training, acutely aware of their audiences and that their audiences monitor them' and react accordingly.

1.3 Exploring the internal perspective

Much of the literature on accountability, from whichever perspective, examines organisational situations which are only tangentially relevant to the study of the project SRO. Most examine the situation from an institutional perspective. The significant gap in the collection of studies is that few look at specific managers in practical as opposed to experimental environments and they are mostly about accountability problems and not about how the agents should deal with them or respond. This shortfall is described by both Schillemans (2013, 22) and Yang (2012, 260). Similarly, the reviews of accountability studies undertaken by Hall et.al. (2017, 219) and Aleksovska, Schillemans, and Grimmelikhuijsen (2019, 12) which focus on the empirical and theoretical work on 'felt accountability' also note the lack of empirical evidence about how public officials assess and deal with multiple accountabilities in actual working environments.

How do accountable managers feel about being accountable? As one official remarked:

Accountability? It's a good question. Is it something you feel or is it something that's done to you? [# 5]

The comment highlights the structure and agency aspects of accountability, and whether accountability is perceived as virtue or mechanism. It is often considered a normative concept, where being accountable is perceived to be a positive characteristic for civil servants. As a governance mechanism, it is something imposed on managers, although Yang (2012, 258) notes this downplays the relevance of the individual's perception of their accountability and their role in creating the accountability environment in which they operate. As a virtue, it is 'close to responsiveness and a sense of responsibility, a willingness to act in a transparent, fair, and equitable way' (Bovens 2010, 949). Whether virtue or mechanism, the actor will have their own perspective.

The demand for an internal perspective

Within descriptions of accountability relationships there are frequent references to the account holder and account giver and the resulting relationship or mechanism, yet analysis of the internal perspective of the actor, and how these individuals feel about their accountability is frequently absent from studies. Much of the investigation into this subjective aspect of how it feels to be accountable is based on experimental studies (Tetlock and Lerner 1999, Tetlock, Skitka, and Boettger 1989, Tetlock et al. 2013) and these rarely extend to senior officials facing accountability pressures in actual environments. Consequently, there is a need for empirical investigation into the influence of felt accountability on organisational behaviour. Yang (2012, 256) noted the concentration on accountability as exogenous to those held accountable and requested future research to consider it as endogenous. Drawing together the interaction between personal perception, accountability systems, organisational characteristics and individual attitudes and behaviours, he poses three questions and argues their answers will lead to more actionable accountability knowledge:

> '(a) Empirically, how exactly do actors of governance perceive, order, and deal with
>
> multiple accountability pressures and why? (b) empirically, what are the mechanisms or
>
> causal linkages that connect accountability institutions with actor behaviours and

organizational/societal outcomes? And (c) empirically, exactly how are accountability institutions produced and reproduced by actors? (2012, 266).'

The internal perspective in empirical research

Asking officials how they consider accountability is not a new research topic, although it is limited. There are few studies which address the felt accountability of senior officials. Sinclair (1995) examined the perspective of 15 Australian public organisation leaders and describes both a structural and a personal discourse in their accounts. Newman (2004, 29) explored the social construction of accountability in a mixed group of 35 UK public managers and suggested 'the value of conceptualising accountability as a cultural and social process as well as something rooted in formal structures and roles.' In a phenomenographical study of how UK public project SROs understand accountability, Lupson (2007) describes four conceptions from an empirical investigation of 30 officials. Whilst this is closer to the context here, that was about their conception of accountability rather than how they managed the complexity of relationships. Yet despite the recognised importance of empirical investigation (Hall, Frink, and Buckley 2017, Yang 2012), there remain few examinations of accountable officials in practice. Schillemans (2015) has researched how officials defined accountability and managed multiple obligations, in a survey of 137 public managers and 15 interviews across the Netherlands, and described how they 'suffer from accountability' (p. 433) and identified coping strategies they adopt to manage multiplicity. Apart from the work by Schillemans and his colleagues in the Utrecht school (Overman, Schillemans, and Grimmelikhuijsen 2016, Schillemans 2016, Schillemans and Bovens 2018, Schillemans and Overman 2018) there is little which addresses the gap.

My research addresses this shortfall and is based upon a series of in-depth interviews, with SROs, undertaken from 2016 to 2019. Civil servants are routinely tasked with being *accountable* for major projects and yet there is no indication of what that means to them. Given the interest in further empirical investigation, and the limited research within the environment of senior officials, my research responds to Yang's questions and determines how one group of

accountable managers in the UK perceive and deal with multiple accountabilities. Then by focusing on the new Osmotherly rules, I consider how these actors interpret and deal with a new mechanism. This is particularly relevant given that the role of these officials is specifically defined as *being accountable*. The selection of my approach using interviews and the challenges it presented are covered in the annex on research design and methods. Participant observation was not possible, due to operational sensitivity, and I chose not to use surveys.

Using surveys to establish the characteristics of accountability is widespread and they have been successfully deployed with public managers (Breaux et al. 2009, Hochwarter et al. 2007). The researchers in the Utrecht school have developed an approach using surveys with which they have evaluated aspects of felt accountability across a variety of managers and European countries. They have developed a series of survey questions which focus on specific aspects of accountability. These would not have been targeted to the SROs particular situation – where being accountable is the expressed role in question - and I considered that it would need an extended period of research to identify appropriate questions. Recognising the workload and confidentiality of the SRO roles, and having discussed my work with the Cabinet Office, I also anticipated a low response rate from the SROs, even if using a similar survey to the Utrecht type. I therefore adopted interviews as the way to gain suitably rich material from the subjects. With the results from my research it should now be possible to construct a suitable survey to expand on the outcomes I have identified.

1.4 Adopting a minimal consensus model

Driven by the 'notorious conceptual complexity surrounding the concept' and the 'bewildering variety of foci under the umbrella of accountability', Schillemans (2013, 13) describes two general approaches to defining accountability that a researcher might adopt. The first is to provide a formal definition of the concept that is in line with the specific area of interest, either at the outset or from the accompanying analysis. The second is to leave the definition vague, or not define it at all, and assume that a reader will know what is being discussed from the context.

I chose to adopt the first of these approaches to enable my interviews to focus on how it felt to be accountable, rather than becoming a search for another definition of the concept.

The ontological challenge of selecting an institutional or a relational basis for accountability is described by Dubnick (2011, 707). The institutional views accountability as part of the mechanisms and organisational structures that create a governance system. The relational assumes that account-giving forms part of basic human interaction and exists independent of a system of governance. There is an overlap, with account giving practices becoming institutionalised within organisations. It is evident from my fieldwork that accountability should be viewed in a non-dichotomist way as both ends and means, as an enabler and constraint, supporting the perspective proposed by Yang (2011, 269). My research considers accountability in the context of public project leaders as part of the governance process and structure with both an institutional and a relationship aspect. The interviews explore the perception of socially constructed accountability relationships so I adopt a relationship-focused approach, accepting Dubnick's (2014b, 652) view of 'account-giving relationships as the basic unit of analysis rather than institutional arrangements and mechanisms.' My approach allowed the participants to describe their own perceptions of the concept in action and encouraged discussion to ensure that both institutional and relational aspects were identified if they arose.

Although SRO's appointment letters make it clear they are accountable for their project, what that means in practice is not made particularly clear. Before participating in the interviews, most said they had considered the concept, how it was defined and what it meant, and many had discussed it with their colleagues. To avoid the interviews becoming a process of describing their prior knowledge, or a rehearsed understanding of the concept, I used one descriptive model of accountability as a basis for the discussions. I chose Bovens' (2007a) approach and aspects of the 'minimal conceptual consensus' described by Bovens, Goodin, and Schillemans (2014, 3). Narrowing the focus to a particular model follows Dubnick's (2011, 707) 'methodological reductionism.' The annex on research design and method describes some of the challenges involved in interviewing individuals who already have some ideas about the

concept, and my rationale for selecting the model. My aim was to present a theoretical description of the core aspects of the concept, in the context of the public sector, without overpowering their own perspective by framing the discussion too narrowly.

Using a schematic to model accountability

When discussing accountability and exploring institutional configurations, mechanisms, and processes, it can be helpful to have 'a' definition of the concept, recognising that there isn't 'one' agreed conceptual model. The range of definitions and typologies used in particular circumstances creates a problem within the study of accountability, evident within the comprehensive reviews of accountability studies undertaken by Hall (2017), Schillemans (2013), and Yang (2012). Whilst each individual description may have relevance in one environment it makes comparisons between them more difficult. Schillemans (2013, 13) notes that there are some generally agreed fundamentals, and draws a consensus from a broad review of publications in six relevant disciplines.[8] From these, accountability is about an agent providing answers to some principal, or others with a legitimate claim on the agent's work. It is a relational concept and focuses on the relationship between account holder and account giver. Bovens, Goodin, and Schillemans (2014, 6) assert that there are similarities across many studies which represent a 'minimal conceptual consensus'.

This social relation between agent and principal is the basis for Bovens' (2007a, 454) definition of accountability as 'a relationship between an actor and a forum, in which the actor has an obligation to explain and to justify his or her conduct, the forum can pose questions and pass judgement, and the actor may face consequences.' This 'narrow definition' dispenses with some of the overlap found with some synonyms. It is portrayed in figure 1.2, adapted from Bovens' original schematic. This illustrates the relationship between an official and a forum, which can be a specific person such as a minister or an organisation such as the National Audit Office.

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[8] The areas were political science, public administration, constitutional law, social psychology, international relations, and accounting and business administration.

To facilitate the discussion with officials I used a schematic which was based on the Bovens model. The rationale for using a schematic is covered in the annex on research design and methods. It facilitated the discussion about how it felt to be accountable without initiating a more expansive discussion about trying to establish a definition of the concept. The model was augmented, as a descriptive framework, by considering the typologies that lie behind certain aspects. The creation and the use of this conceptual model is described in the annex and the annotated schematic used in the interviews is shown at figure A.1 on page 280.

Figure 1.2 Accountability Schematic, after Bovens (2007)
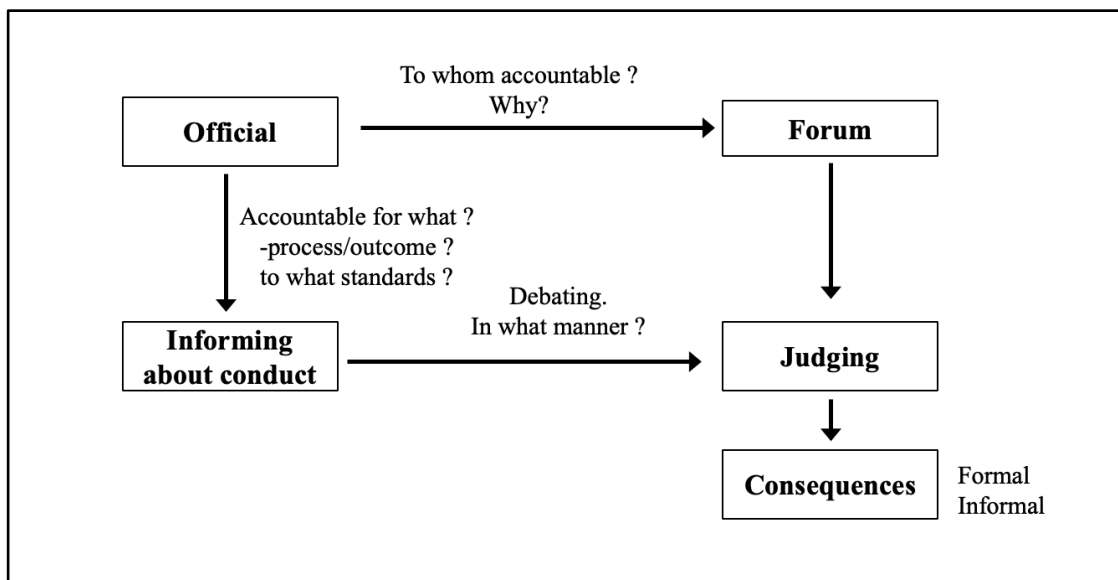
Source: Modified from *Analysing and Assessing Accountability: A Conceptual Framework* (Bovens, 2007, p. 450).

In the Bovens model, account giving has three characteristics. The first is that there is an obligation on the official to *inform* the forum about his or her actions, including explanations and justifications. The second is that there needs to be the possibility for the account holding forum to interrogate the official, and to question or *debate* the information or legitimacy of the actions. The third is that the forum may pass judgement on the official's conduct, with the possibility of some form of *consequences*. Mulgan (2000, 556) observes that along with an information exchange, accountability has a sense of potential rectification that goes beyond

simply giving an account, although he also notes that on the other hand, including sanctions may go beyond that core notion. On the other hand, whilst sanctions are regarded by some as a necessary part of the relationship (Mulgan 2000, 555, Lupson 2007, 32) the nature of the sanctions may actually be very informal or almost non-existent.

SROs work in positions where both selection and sanction are important aspects of their environment, and this convergence is evident in their descriptions of accountability. The debate on the most suitable way to safeguard against what Carr (1999, 4) describes as 'the abuse of administrative discretion' has continued since the 1940s exchange between Friedrich and Finer (Jackson 2009). Friedrich suggested that selecting individuals with a commitment to the public sector would be the best way to ensure they acted appropriately. Finer countered that external sanctions and controls were necessary. The debate runs through to more recent discussions about the motivation of civil servants as 'knights or knaves' (Le Grand 2007). Both aspects appear within the environment and Mansbridge (2014, 74) argues that the social context affects different aspects of identity, highlighting the importance of the mix of personal and institutional motivations. Like Mansbridge (2014, 61), many SROs recognised calls for 'more accountability' as sanctions-based demands for more power to be exercised to force them to do what particular principals want. Many of the officials I interviewed recognised that giving an account had *consequences* but felt less inclined to identify *sanctions* arising from it, as that implied a more negative outcome than they accepted. Accordingly, as in Bovens' model, during the interviews I generally adopted *consequences* as the term to describe the result of the judgement.

Describing components of the accountability model

Looking at each aspect of Bovens' framework in figure 1.2 raises some questions. What types of forum are there? What form of relationship exists between the actor and the forum? What obligations are there to ensure they provide an account? The answers depend upon the context and specific circumstances of the accountability environment. I used terms from existing typologies to annotate the schematic, providing context for the discussion and the

subsequent evaluation of the participant's accounts. I used the annotations to convey the breadth of possible interpretations of each aspect of the model rather than to describe an alternative definition of the concept. When assessing the descriptions of account holding forums and how they are managed, the variety of perspectives provided a necessary and useful vocabulary. These covered types of forum and different relationships. Although *accountability forum* and *a principal* can be synonymous, the concept of *forum* can represent a variety of individuals and organisations that did not establish the initial role of the agent (Busuioc and Lodge 2016, 249). That is the case with many of the forums here which are seeking to get an account as part of their role in oversight, or audit, or as a potential user, or beneficiary of the project, or as a pressure group. *Forum* should be regarded here as a catch-all term for any entity which is seeking to get the official to deliver an account.

In their classic work on the NASA Challenger disaster, Romzek and Dubnick (1987), examined how NASA officials tried to manage diverse accountability expectations. They describe four types of relationships perceived by public managers and related them to the source and degree of control exercised over the actor; *bureaucratic* (or hierarchical), *professional*, *legal* and *political*. Each forum was seen to 'demand different kinds of information and apply different criteria as to what constitutes responsible conduct (Romzek and Dubnick 1987, 227).' These relationships are rarely completely independent, and officials may find themselves dealing with all of them simultaneously, and from multiple claimants. Romzek (2000, 420) notes, 'these distinctions matter because each type of accountability is based on a different performance standard. An individual can perform acceptably under one standard and be outside the bounds of acceptable behavior under another.' Managers may also find themselves in dynamic situations as claimants change the form of their expectations and the relationships change.

In a European context, Bovens (2007a, 455) identified five different types of forum. *Political* 'exercised along the chain of principal-agent relationships' between the voters, via their elected representatives, through to ministers and on to civil servants. In the case of major projects, the SRO and Project Director sit at one end of the 'democratic chain of command' or

'chain of delegation' that stretches from voters to the bureaucrats, described by Jarvis (2014, 406) and Strøm (2000, 267). Bovens' *professional* relationship is similar to Romzek and Dubnick's and exists where officials are allowed extensive autonomy working within norms derived from professional practice, training, or experience. The forum is usually within their organisation or professional peer group. It may not exist as an established entity but can represent the anticipated opinions and expectations of professional colleagues.

Legal accountability relationships exist between autonomous entities rather than through hierarchical supervision. This has similar characteristics to the *legal* form recognized by Romzek. The oversight may be compliance with legislative or other restrictions, and with external standards. This operates outside the normal hierarchy and is based on specific and formal responsibilities conferred upon the forums, although an official may have limited autonomy to disregard the forum's expectations. Parts of the Cabinet Office, the Treasury, or regulators, might be considered in these roles. The other part of Romzek and Dubnick's *legal* forum is described by Bovens as *administrative*. These are relationships with auditors, inspectors and independent supervisory authorities. They have no legislative control over an official, but they have an independent and horizontal, as opposed to vertical and hierarchical, relationship.

Horizontal accountability relationships are those where the official is not hierarchically junior to the forum (Schillemans 2011, 390). Bovens' *social* forum represents the accountability deriving from interest groups, client communities, and other stakeholders, including the public at large. There may be external pressure but little direct control, if any. The actor has significant discretion but might be expected to be mindful of the consequences of their actions given the expectations of these stakeholders. In the context of the SRO, this group could include the public as service user or taxpayer.

These two typologies are quite similar in their analysis although the titles they use for their descriptions differ. Bovens notes a distinction between managerial, which is accountability to a hierarchical structure, and administrative, which is accountability to regulators or other bodies. Both are forms of executive accountability. Another typology,

proposed by Koppell (2005), describes the way officials manage their account giving behaviour, and has five dimensions; 'transparency, liability, controllability, responsibility and responsiveness'. Beyond the relationship between principal and actor, other typologies consider the question '*what is the actor accountable for?*' and base their descriptions accordingly. These reference political, managerial, consumer, judicial, parliamentary and community, amongst other forms of accountability (Flinders 2002, Lupson 2007, Newman 2004, Oliver 1991, Sinclair 1995, Stone 1995). These can then be further developed to reveal encompassed subtypes. Sinclair (1995, 222) describes public sector managers with managerial accountability as potentially having *fiscal*, *process*, *outcome* or *programme* accountability. In an alternative description, four 'features of the accountability environment' are described by Hall, Frink, and Buckley (2017, 209). The *source* is about to whom the individual feels accountable, but they note that limited attention has been paid to how actors prioritise these different relationships. Their *focus* considers whether it is process or outcomes which are relevant. The importance of the outcome for which the individual is held accountable is described as *salience* and they consider how individuals may respond more actively if their actions have significance. The multiplicity of forums perceived by an agent is represented by *intensity*.

Much of the study of accountability is characterized by this identification of forum types based on the specific context under review. As Sinclair (1995, 221) notes, the definition of accountability 'is dependent on the ideologies, motifs and language of our times.' When discussing accountability with officials, they use terms that are relevant to their own situation and their particular vocabulary to describe aspects of the accountability relationships and the mechanisms. It is essential to be alert to the terms used, and to avoid forcing them to fit a specific typology, but to recognise the meaning within their perception of accountability. This challenge is described further in the annex. These different terms within the typologies formed some of the basic vocabulary that was used on the schematic and found in the interviews. The participants use of particular terms, and their subsequent explanation of what the term meant to them, provided an insight into their perception of the accountability relationships and how they made sense of the concept and its application to their situation.

1.5 The accountability environment in practice

Civil servants face a variety of formal and informal account-holders and these multiple dyadic relationships have different, and often competing, requirements. In their project roles they are not only dealing with *wicked* operational problems (Rittel and Webber 1973, 155), but are also facing similarly wicked accountability requirements, within a dense web of relationships (Page 2006, 167). When considering their experience, some aspects stood out in their descriptions. The first is that accountability regimes are often created or developed in response to earlier problems, where lack of suitable mechanisms or ineffective management of them has identified an 'accountability deficit' (Mulgan 2014). The second is that a forum may hold an agent to account against a variety of dimensions, (Koppell 2005), and different forums hold an individual to account against varying and competing criteria.

There is no shortage of literature about problems with the definition and application of accountability. Accountability is frequently reviewed ex post and as Frink and Klimoski vividly note, 'strewn across the landscape of organizational history are the wreckages of accountability failures' (2004, 1). The creation of the government's Major Projects Authority (MPA), and the comments of Cabinet Office ministers stressing the need for better accountability from officials (IPA 2016, 1), are examples recognising this phenomenon. The impact of accountability deficits, in situations where failures have occurred or where there are obvious challenges, is widely covered in studies. Schillemans (2013) identified *accountability-deficit* as the predominant topic within almost two thirds of the relevant papers in his review. These deficits were related to a number of areas, particularly decoupled governance and administrative reforms which have changed the traditional hierarchical control within institutions, or where regulators are creating issues because of their own organisational autonomy (p. 12). However, the challenge faced by senior civil servants is rarely a deficit of accountability but a surfeit. This profusion of actual, potential, and perceived relationships is capable of placing multiple conflicting demands on officials. Addressing the problem of multiple accountabilities is the normal problem for the leader of a major public project.

Working with a network of accountability relationships, public managers face two types of problems. The first is when there are different expectations arising from these many forums. The second is when an individual relationship has within it multiple or variable expectations. Facing both these problems, project officials may be overwhelmed or unable to meet all the expectations. Officials described it as difficult, if not impossible, to meet the accountability-expectations contained in their multiple relationship and the implicit lack of clarity regarding the meaning of the term and the specific nature of 'for what', 'to whom', and 'how'. Even facing one forum it could be impossible to meet all the requirements of Koppell's five accountability dimensions of 'transparency, liability, controllability, responsibility, and responsiveness' (2005, 96). He describes this problem as '*multiple accountability disorder*' (MAD) and argues it impedes organisational effectiveness.

Senior project officials face a variety of stakeholders, each with their own perspectives on control and oversight of the project activity. Another MAD type problem occurs when they are faced by multiple forums that have different expectations of them and the project. Schillemans and Bovens (2015, 6-8) identify a variety of negative consequences which could arise when an agent faces many principals. Voorn et al (2019, 677-678) identified similar problems in a review of studies into the problems of governance with multiple principals. All of the challenges identified by Schillemans and Bovens, and Voorn et al, were evident in the fieldwork conversations. The diversity of accountability relationships, and their inherent challenges, creates uncertain situations for the SRO as account-giver, particularly as 'accountability abhors ambiguity' (Porter-O'Grady, Parker, and Hawkins 2009, 56). Whilst ambiguity may be perceived to be 'the enemy of effective accountability' (Olsen 2014, 107) it is also a significant aspect of the environment of the public sector, and may be particularly attractive for politicians (Page 1976, 742). This is particularly evident at the level of the senior civil service where policy interacts with implementation, and which was described by several participants as a feature of their accountability within departments.

The empirical journey

The studies of accountability provide a range of theoretical and analytical perspectives which inform the investigation of the SROs' understanding of their accountability. Having described the pertinent literature on accountability I will outline the empirical investigation and the rational behind the various chapters. Chapter 2, *Accountable Officials* places the SRO within the context of the government departments and the major project environment, and outlines the public sector reforms which led to the role's creation. After that there is a journey in chapters 3 to 7 through the empirical research, from a broad overview of how it feels to be undertaking a large and important role in a department, through the SRO's approach to identifying the salient forums and how they are managed, narrowing down to the evaluation of one specific mechanism and its impact. I then draw the themes together in chapter 8 where I describe the central arguments within the thesis and their position within the literature and debates about civil service reform.

SROs are accountable for the most significant government projects and these are large and complex with a consequent plethora of account seeking forums. In chapter 3, *Feeling Accountable*, I cover the general perspective of how the SROs feel about working within this environment. Their overview covers the scale and importance of these roles and draws on Flyvbjerg (2013) on the inherent challenges within mega-projects and Hargrove and Glidewell (1990) on the near impossibility of satisfying all their stakeholders. The complexity of the web of relationships (Page 2006) and the gradual normalisation of additive accountability mechanisms (Vaughan 1996) lead to a blurring of the governance system. The roles are subject to intense scrutiny where SROs recognise the prospect of blame and damaged reputation (Busuioc and Lodge 2016, Hood 2011) but also describe the legitimate need for accountability.

In chapter 4, *Evaluating Forums*, I consider the challenge arising from the extensive range of prospective forums, and address the question of prioritisation raised by Hall, Frink, and Buckley (2017). Officials must evaluate the forums before deciding how to manage their expectations and the attributes they consider are identified from the interviews. These findings support the importance ascribed to authority, expertise, legitimacy and expectation identified in

previous studies (Bovens, Goodin, and Schillemans 2014, Mashaw 2014, Overman, Schillemans, and Grimmelikhuijsen 2016, Schillemans 2016, Lerner and Tetlock 1999). I adapt the stakeholder theory of Freeman (1984) and its modelling by Mitchell, Agle, and Wood (1997) to display the results and describe a typology of forums.

Building on the identification of key attributes and a forum typology, chapter 5, *Categorising Forums*, is a mapping exercise to identify how the 20 types of forum identified in chapter 3 map to the typology created in chapter 4. Dubnick (2011, 712) notes that studies of accountability reform (of which the revision of Osmotherly is an example) should 'require at the outset an examination or "mapping" of the relevant accountability space... to establish both a better understanding of the accountability regimes through which we govern and a foundation for truly effective change.' Within the mapping undertaken here, three groups of salient forums are evident. The departmental management where the salience of the permanent secretary is clear but that of ministers less obvious. Parliamentary scrutiny forms the second group, featuring the actions of parliamentary committees and the interaction of the NAO and PAC (Sharma 2007). A third group covers the Cabinet Office and Treasury in their project oversight roles. Reviewing the remaining forums I describe a category with minimal attributes, yet an important impact on the SRO and their sense of public sector ethos (Carr 1999, Heywood 2012).

Having established the salience of the forums and their attributes, in chapter 6 *Managing Multiplicity* I consider how the SROs manage the conflicting account holders that could demand attention, reflecting the multiple accountability disorder described by Koppell (2005). I describe four coping strategies, some matching those identified in other studies (Schillemans 2015). Layered and informal accountability are also important aspects of the environment (Bardach and Lesser 1996, Romzek, LeRoux, and Blackmar 2012). The SRO's programme management board is recognised as a significant institution for managing forum priorities.

Having determined the priority of the most relevant forums, mapped them onto a typology, and identified the strategies available to the SRO to manage their multiplicity, in

chapter 7 *Evaluating Osmotherly,* I address the introduction and operation of one new mechanism. The revised Osmotherly rules provide an unusual opportunity to examine the creation of a new accountability mechanism and its associated accountability relationships. Examining the interaction of SRO, parliamentary committees, departmental management, and other forums, shows the inherent complexity of adding to the existing web of accountability (Page 2006). My research highlights the importance of the agent's perspective of a mechanism as there were multiple interpretations of the intention behind the Osmotherly revision and these led to different responses by the SRO. It also brings to the surface some insights about the importance of reputation and the identification of critical audiences to the performance of accountability events (Busuioc and Lodge 2017, Goffman 1959).

In *Weaponising Accountability*, at chapter 8 I draw together the various themes. Dubnick described the challenge of introducing new accountability mechanisms in his reformist paradox (2011, 706) that 'any effort to improve accountability through reforms generates consequences that in fact alters and often undermines existing forms of accountability already in place'. Some of the SROs described the new Osmotherly rules as an accountability mechanism pointed at them like a weapon. It is evident from my research that the implied weapon of new accountability does not necessarily function as their author or sponsor intended. When the perspective of the agent is used to evaluate the mechanism it can be seen that there are not only multiple potential outcomes and accountability relationships created, but that the mechanism may actually work in reverse and that those who thought of themselves as principals find themselves in a new role as agent to the SRO as forum. Careful evaluation of accountability relationships from the agent's perspective prove to be critical to an understanding of accountability in practice. The thesis shows that if accountability is thought of as a weapon for reform then the need to understand exactly how it works is essential.

Whilst the setting is a specific one relating to projects within the UK, my thesis links to wider debates about the nature of accountability and how it is dealt with in practice. It provides answers to the questions raised by Yang (2012) and Hall, Frink, and Buckley (2017) about how actors prioritise and manage multiple accountabilities and fills a significant gap in the academic

literature on accountability. Adopting a reputational perspective, I provide an insight into how officials approach their account giving behaviour and relationships, and confirm that when dealing with accountability, reputation and wider audiences matter (Busuioc and Lodge 2016).

With increasingly fragmented lines of responsibility for the implementation of public policy it is important to uncover what is meant by the 'accountability' of officials and how it operates in practice. Central to my analysis are the perceptions of public managers who are dealing with the practical and competing pressures of enacting pubic policy. If we are to introduce reforms to public sector institutions to hold officials *'more accountable'* then we should know what it means to those individuals. We should also know if and how such reforms actually work. By approaching the topic from the perspective of these senior officials my thesis explores the multiple forums involved and the interplay of ministers, departmental officials, audit institutions and the various oversight bodies across government. This fills an important empirical gap in our understanding of modern bureaucracy in the UK.

Conclusion

Accountability is an old concept, the term is widely used and conflated with a number of synonyms and is therefore difficult to pin down. It has entered general usage as a blurred and complex idea. There are a number of theoretical approaches adopted in studying accountability and a range of typologies used to describe it in practice. This breadth illustrates its use over a wide range of objectives. Whilst the accountability of public managers is widely studied, the internal perspective of the manager is frequently lacking. There is a need for increased empirical investigation into how it feels to be accountable and how individuals deal with the pressures arising from multiple accountabilities. I reveal how participants recognise and describe their own 'feelings of accountability' and how they prioritise and manage their multiple relationships.

To avoid the fieldwork becoming a search for another definition of the concept I use a specific model within the conversations with the participants and I incorporate broad descriptive annotations to encourage discussion. Adopting a minimal consensus from existing reviews of

the field of public accountability, the definition I used was '*a relationship between an actor and a forum, in which the actor has an obligation to explain and to justify his or her conduct, the forum can pose questions and pass judgement, and the actor may face consequences'* as proposed by Bovens (2007a, 454). When considering the participants' response, theoretical perspectives such as principal-agent, social contingency, and reputation, provide an insight into the managers' descriptions of felt accountability. Various typologies covering the type of forums and relationships also provide context.

The potential challenges faced by accountable executives are evident in an environment with multiple forums, each of which may have competing and complex expectations arising from the accountability relationship. Using the model as an aid, and with the insights from a variety of studies, I was able to investigate how this group of officials deal with these challenges, how they perceive their relationships, how they assess their importance, and how they manage them as a result. Before addressing the empirical findings, in the next chapter I will outline the background to their environment, the origins of the function of Senior Responsible Owner, their position within the government's major project environment, and the introduction of the new Osmotherly accountability mechanism.

Chapter 2. Accountable Officials

As SRO you are accountable for the programme and delivering the full business case and you're accountable 'soup to nuts', and that requires agility, guile, cheekiness, being bloody pushy, creating a stakeholder network above all which is supportive and you need get all these entities aligned, dealing with all those people who want to hold you accountable, because the environment we operate in is manic, and these projects are huge, and everybody has different ideas about what the programme is meant to be, and then they stick the Osmotherly rules on you and say now you're accountable to the Public Accounts Committee, usually followed by a comment 'rather you than me!' [#6]

The post of the Senior Responsible Owner (SRO) was established following a review of widespread problems in major public IT projects during the 1990s. It is now part of the governance for all major public projects. The portfolio of these projects includes spending commitments exceeding £440 billion, so many of them are at a financial scale that makes them a significant part of both departmental expenditure and total government investment. The chief executive of the Infrastructure and Projects Authority (IPA) makes their importance clear in the 2017 annual report:

> 'The vast majority of government policies are delivered through projects of various forms. It is therefore vital that we deliver projects successfully, and continuously build our capability to do so. If projects fail, then the government's policy objectives are not delivered.' (IPA 2017, 3).

Each project has an SRO who is held accountable for it. The complexity of what *held accountable* means is explored in the five chapters of empirical analysis. First, in this chapter, I

consider the nature of accountability within government departments, which includes

ministerial and managerial accountability, and the select committee system of parliamentary

oversight. Next I address how the SRO role was created to address historic failures within

government project implementation. I then examine the scale of the major projects portfolio

and the development of accountable project leadership and mechanisms for project oversight

within government. Finally I consider the recent changes to the rules on giving evidence to

select committees, which have substantially changed the accountability environment of the

SRO. My intention is to position the role of the SRO within the context of departmental and

project governance, and to describe the relevance of the revised Osmotherly rules to their

accountability environment.

2.1 Accountability and governance in Whitehall

The UK Government undertakes a wide range of projects to implement their policies, deliver

new infrastructure, military capability, or refresh departmental capabilities. The most

significant form a list known as the Government Major Projects Portfolio (GMPP). In 2019

these represented commitments to invest over £440 billion in activities undertaken by 16

departments and arms-length bodies.[9] These projects are led by civil servants and the project

SRO is the nominated individual who is accountable for the project within the department.   The

SRO operates within the leadership team of the department and within its senior governance

structures.

Departmental Governance

At the political head of a department is a Minister of the Crown, the Secretary of State, who has

a number of junior ministers to whom they delegate specific aspects of a department's activity.

The permanent secretary is the civil service head of the department. The permanent secretary is

appointed as the accounting officer (AO) for their department. The parliamentary website

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[9] Figures from the Infrastructure and Projects Authority *Annual Report on Major Projects 2018-19*. (IPA 2019a)

describes the AO as 'personally responsible for the regularity and propriety of expenditure, robust evaluation of different mechanisms for delivering policy objectives, value for money, the management of risk, and accurate accounting for the use of resources (www.parliament.uk 2011a).' As they are responsible for everything within their department, these permanent secretaries also find themselves accountable for the projects within their department, alongside the SRO.

The complexity of government departments and their governance structure is encapsulated in the Accounting Officers System Statements (AOSS).[10] The remit for these annual statements, which accompany the departmental Annual Report and Accounts, is defined by the Treasury:

> 'Principal Accounting Officers of the main central government departments should provide a statement of their accountability systems, covering all of the relevant accountability relationships within the department, including relationships with arm's length bodies and third party delivery partners (Treasury 2017, 3).'

The statements describe the accountability systems within departments and the approval processes and boards that each department uses for all of the public money and resources they manage. The AOSS contain information on the account holding committees within different departments and the manner in which the permanent secretaries oversee their departmental governance. They contain from 20 to 40 pages, and include some detail on their accountability for departmental projects.

One notable feature of these documents is their illustration of the variety of different structures, names, and composition of the account holding bodies within the departments, as there is little standardisation of these committees across government. This proliferation was evident within the interviews, with SROs referring to their own specific departmental committees to which they had to account: the Performance and Risk Committee; Portfolio,

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[10] Departmental AOSS are accessible at www.gov.uk/government/collections/accounting-officer-system-statements

Performance, Investment and Risk Team; Project and Investment Committee; Departmental Audit and Risk Committee; or the Portfolio, Investment and Change Committee. Although GMPP projects are important to departments, there is limited information about their accountability and control within departmental documents such as the AOSS, which was felt by the NAO to be a deficiency.

> *The AO's statements ought to be much more interested in these projects and the explanation of how they are controlled. It is rare to see their accountability taken seriously in an AOSS given the problems most of them are facing.*[11]

Within the department, the permanent secretary is supported by a secretariat function which includes their private office.[12] There will also be the policy staff supporting the ministers and permanent secretary, and functions such as finance, estates and human resources. There are a number of directorates covering the principal activities of the department. These are headed by a Director General (DG).[13] In some departments, such as the Home Office or Ministry of Defence, there might be a Second Permanent Secretary (2PUS) whose role is to support the Permanent Secretary in the running and oversight of the department. The 2PUS may have a number of DGs reporting into them directly rather than to the Permanent Secretary.

As noted in the department's AOSS, there are a variety of accountability institutions in the form of boards and committees which provide a governance structure for departmental activities. In this area, little appears to have changed since Rhodes (2011, 295) noted the importance of the committee as a pre-eminent coordinating function of governance in departments, as well as between them. The senior committee in a department is chaired by the permanent secretary, and is normally called the *Management Board*. It is supported by other committees, some under the various titles noted above, dealing with projects, risk, audit, and

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[11] Interview with senior NAO Official, 2019
[12] Ministers and permanent secretaries have a small group of civil servants, known as the private office, providing immediate support, diary management, and communication within the department and across government.
[13] A DG, is at Senior Civil Service Grade 3 (SCS3), which is the level below the permanent secretary.

functional activities such as operations, finance and investment. The functional DGs and their specialist colleagues are members of the management board. At this meeting, as well as within personal one-to-one meetings, the permanent secretary can hold his DGs to account. SROs are normally found from the ranks of the DGs within a department. The SRO is operating in this environment, often as a functional DG, at the level where Rhodes (2011, 292) described departmental managerialism confronting the blurred accountability where ministers and top civil servants meet.

Managerial accountability in the department

Departmental DGs work where there are 'two overlapping areas of *political* and *managerial* accountability' (Day and Klein 1987, 26). Political here reflects the way elected officials, such as ministers, are ultimately answerable to an electorate who are able to vote them out of office. Although that may be regarded as a weak accountability mechanism with little actual control over routine behaviour by politicians (Warren 2014, 45). Managerial accountability reflects the way civil servants, with authority delegated to them by their ministers, are accountable for the management and implementation of the government's policies. Describing civil service accountability as 'the power sharing arrangements within modern systems of governance', Uhr (2014, 227) distinguishes between the external accountability to representatives of the public, and the internal accountability within departments, describing the latter as a way of 'letting the managers manage (2014, 230).'

Much of the focus on public sector accountability is about the way in which politicians, ministers, and their closest officials interact. *Managerial accountability* is about how these departmental officials can be held to account for the way they manage their portfolios within their departments and for the implementation of policy. Uhr (2014, 227) describes this as *bureaucratic* accountability. The distinction between politics and administration is rarely precise. The separation of *political* from *managerial* accountability reflects how politicians and officials consider who is answerable, to Parliament and the public, for what is done within government. It is part of the nature of the 'public service bargains' between politicians and civil

servants (Hood, 2006). When considering the accountability of the SRO, the focus is on Uhr's

internal accountability. It is about how those tasked with being in charge of major government

initiatives deal with their accountability. The challenge of separating the political from the

managerial was evident in some of the comments from SROs.

In these managerial roles they are in politically sensitive positions. The actions of these

officials are overseen by, and are important to, their departmental ministers. Many of the

project leadership roles are highly political in the sense of being related directly to major policy

initiatives that are politically sensitive (High Speed Rail, Universal Credit, or the Home Office

E-Borders project). For the SRO, the question is not about the way in which government has

determined the policies it wishes to enact, or how policies have been developed between

ministers, civil servants, and advisors. SROs are held accountable for the implementation of the

policy, in the form of a project, once the political leadership of the department has decided to

undertake it. In Uhr's words, their accountability is to ensure 'the managers manage'.

Ministerial accountability

SROs frequently referred to *ministerial responsibility* and for ministers there is both collective

and individual accountability. The Secretaries of State have a collective accountability to

government as part of the Cabinet. They also have an individual accountability to Parliament

where they must account for their management of the department and its resources, which

reflects the concept of ministerial responsibility. Barberis (1998, 453) considers descriptions of

the minister as accountable for anything within their departments, with everything 'treated as if

it were the actions of the minister' as illusory. Similarly, Rhodes (2011, 306) argues that

'ministerial responsibility may be a fiction in that ministers do not resign when their

departments are at fault. However, ministers and civil servants act as if ministerial

responsibility is a brute fact of life.' Ministerial departure normally requires a serious failure,

and the 'smoking gun' described by Thompson and Tillotsen (1999, 49), who note 'politics, not

theories of accountability, determines the fate of ministers.' There was little evidence in my

interviews that the behaviour of civil servants, based on their acceptance of ministerial responsibility, had changed since Rhodes' examination of it in the early 2000s.[14]

Since that time, as Bamforth (2013, 269) explains, ministerial responsibility has been encapsulated in the Ministerial Code which requires ministers to 'account, and be held to account, for the policies, decisions and actions of their departments and agencies' (Cabinet Office 2019. section 1.3.b).[15] However, Bamforth emphasises that as a constitutional convention, and only enforceable at a political level (pointing out that the ultimate sanction is enforced resignation), it lacks the legally enforceable position that is placed upon their civil servants. Civil servants have legal employment conditions that link their accountability to ministers thorough a combination of the Constitutional Reform and Governance Act 2010 and the Civil Service Code (Bamforth 2013, 270). So, for ministers, accountability is largely a political position, but for civil servants it can be a legally enforceable one. However, the convention places ministers in the public spotlight for their departmental activities, while for most civil servants there is limited exposure to Parliament or public in the way that applies to their political leaders. Whatever the reality of ministerial responsibility in action, until the late twentieth century almost all senior civil servants were largely unknown outside their departments. They were not specifically identified or particularly *visible*.

The changes introduced as part of the Financial Management Initiative and the Next Steps Agencies programme during the 1980s and 1990s increased the visibility of some senior civil servants tasked with running parts of the departmental portfolio. New accountability institutions appeared as part of the process of creating new executive bodies. Despite retaining the primacy of ministerial accountability to Parliament, these changes led to 'innovative forms of bureaucratic accountability' (Hogwood, Judge, and McVicar 2000, 206). Where previously civil servants had operated behind their ministers as anonymous figures, agency chief

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[14] Ministers do resign, and for largely political reasons. 60 resigned from the 2017 May ministry although only 2 were connected to breaches of the Ministerial Code.
[15] The Ministerial Code is not legally binding, and is enforced at a prime minister's discretion. An update is usually issued at the start of each new administration and there have been five revisions since 2010.

executives and senior officials were now increasingly visible, and accountable for their own actions. However, this spread of accountability within the department, from the elected politician to a wider group of civil servants, was seen by some to have 'created more complicated and less transparent networks of interdependence' (Lynn 2006, 154). Despite the increased profile of some senior figures during this period, few officials, other than the department's permanent secretary, were ever expected to make an appearance in front of a select committee.

Parliamentary scrutiny and the Osmotherly Rules

Parliament holds a government to account, along with its ministers, and their civil servants, through the scrutiny system provided by parliamentary committees. The officials leading major projects have always been accountable through their permanent secretary to their ministers. Those ministers could be asked to send civil servants to give an account to Parliament on their behalf. Committees operate in both the House of Commons and House of Lords, and the current structure was established as the departmental select committee system in 1979 (Cane and Conaghan 2008, 198). Each committee has eleven or more members of the relevant chamber. In the Commons there is a committee for each government department, which examines their policies, administration and spending. The Commons also has cross-departmental committees such as the Public Accounts Committee. Committee members determine their programme of investigation, and then have the 'power to "send for persons, papers, and records" relevant to their terms of reference' (www.parliament.uk 2017). It is this ability to call witnesses, and question them in public, that enhances their authority as an account holding institution.

The select committee inquiry process has formal procedures. It first publishes its proposed terms of reference and calls for written submissions (called memoranda). It then holds an oral examination of witnesses in public, within one of the committee rooms in Parliament. These may be televised and available online. Following these meetings, the inquiry concludes

with the publication of a report, along with a record of the written and oral evidence.[16] The government must then respond to the specific issues raised within the report. Select committees can call for anyone as a witness and this includes civil servants, technical experts, and members of the public. Individuals may be called upon to appear as witnesses at oral sessions or to provide written evidence. As a convention, ministers, and members of either house generally, may not be *summoned* to attend as witnesses, but can be invited to review current policy. Since 2002 it has been expected that the prime minister would appear in front of the Liaison Committee.[17]

Committees issue *informal invitations* to those they want to see but do not have the authority to enforce attendance. Any actions to force a witness to appear would fall to the House of Commons itself. In the case of civil servants called as witnesses, they generally do so on behalf of their ministers. As noted in Erskine May, the guide to parliamentary procedure and conventions:

> 'Civil servants frequently give evidence to select committees, although successive governments have taken the view that they do so on behalf of their Minsters and under their direction, and that it is therefore customary for Ministers to decide which officials should represent them for that purpose (www.parliament.uk 2019a Part 6, 38.35).'

How civil servants should provide evidence to select committees, and guidance on the relationship between these committees and the civil service, is provided by the Osmotherly Rules. A brief history of their development is at appendix 2. They were originally drafted in the 1970s by a civil servant in the Cabinet Office, called Edward Osmotherly, and were issued in 1980 following the establishment of the select committee system. They have remained associated with his name, and the *Osmotherly Rules* has become verbal shorthand for the relationship between civil servants and committees within the senior civil service.[18]

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[16] Detail of the interaction of committees with the NAO is covered in chapter 7.

[17] The Liaison committee of the House of Commons deals with the role, core tasks and guidelines for select committees. Membership is made up of the chairs of all the individual select committees.

[18] Their understanding may be limited to those who have need of them in the senior civil service. Some SROs felt they were largely unknown by most of their junior colleagues.

The rules provide advice on the provision of information to committees and act as guidance for civil servants on how to provide evidence, although they have not been formally accepted by Parliament. Select committee chairs have frequently tried to broaden their authority to call civil servants to account (Hodge 2016, 40-42). The guidance has been regularly updated since inception, but there have been frequent complaints from select committees in Parliament that they do not allow effective scrutiny. Their restrictions on disclosure of advice to ministers have been regarded as frustrating the investigation of poor implementation (Mulgan 2003, 54). Sir Alan Beith when chairing the Liaison Committee felt that the Osmotherly rules at that time, in 2012, were 'preventing committees from hearing from civil servants who were responsible for project failures' (Chambers 2012). Their amendment since then has created the new accountability mechanism for the SRO, which is part of the focus of this research, and covered in section 2.4 and in detail in chapter 7.

2.2 Addressing historic failure

Successive governments have failed to turn some of their policies into the practical delivered solutions they envisaged. There seems little shortage of advice, but 'implementation has been the Achilles' heel of the UK system' (Harris and Rutter 2014, 4). The mistakes made by governments can sometimes make alarming reading. King and Crewe's (2013) selection of policy and delivery *blunders* covers numerous examples. On the other hand, in his review of their work, Flinders (2014, 357) notes that concentrating on the errors, and the 'well known pathologies of the British constitution' may mask a reality that much of what is done by government actually, to a greater or lesser extent, meets the intended policy objectives. However, as Barber (2015, xi) points out 'government errors attract a lot of attention… the practices of governments that succeed in making real improvements to the lives of their citizens attract very little attention.' It is the errors that have led to calls for more accountable civil servants.

As the challenges faced by governments become more complex and the public's expectations more immediate, 'the wicked issues of the twentieth century' are being replaced

'by the super wicked issues of the twenty first that demand complex and inevitably risky mega-projects' (Flinders 2014, 360). These mega projects are the basis for the GMPP. Given the 'wicked issues' being addressed, the major projects established to deal with them require very effective leadership. There have been regular reports by the NAO about the difficulties getting these projects underway or completed. These have addressed specific failures, problematic departmental processes, or lessons learned as a result of problems (NAO 2007, 2012a, b, 2013, 2014). Their reports do not address the appropriateness of policy, but examine the way that policy is implemented, and are a report to Parliament on the 'economy, efficiency, and effectiveness' with which various government bodies have used the public money they have been allocated. These reports are usually followed by a hearing at the Public Accounts Committee. Addressing a record of implementation failure, the Deputy Chair of the PAC commented 'politics does not place a sufficient premium on implementation in the way that governments need it to, and this has to change' (Bacon and Hope 2013, xxvi).

Creating the accountable project owner

The failures when implementing large government IT projects in the 1990s had already led to changes in the management of some public projects. There are two significant leadership roles for major projects. Running each project is a project director (PD) who is the most senior person within the project organisation, and manages the team working on the project. The SRO is a more senior official and represents the project within the department. The PD is accountable to the SRO for the project although there is not always a formal line management hierarchy between them. The SRO will usually be a DG, selected from the small group of the most senior officials in the department's 'strategic apex' (Mintzberg 1989, 98). The position of SRO was a recommendation from the Cabinet Office 'Modernising Government in Action: Successful IT' report in 2000 (CITU 2000).[19]

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[19] The Modernising Government programme aimed to improve delivery and implementation of policy. It was announced in March 1999 by the Minister for the Cabinet Office, Dr Jack Cunningham.

The 'Successful IT' review set out ten areas for attention, including the approach to business change within government, leadership and responsibility, project management across government, and risk management. These changes were regarded as relevant to all government project implementation. The report considered examples of successful implementation from around the world. Noting a lack of accountability, reflected in confused direction and management at senior level, the report proposed a requirement for *active ownership* of projects within departments. The changes required both a senior project manager 'in the lead' but also one person 'at the level above this' to 'bring together and own all the components of the change to ensure business benefits are delivered as intended (CITU 2000, 15).' The structure recommended is shown at figure 2.1.

Figure 2.1 Project structure from *Modernising Government in Action: Successful IT*
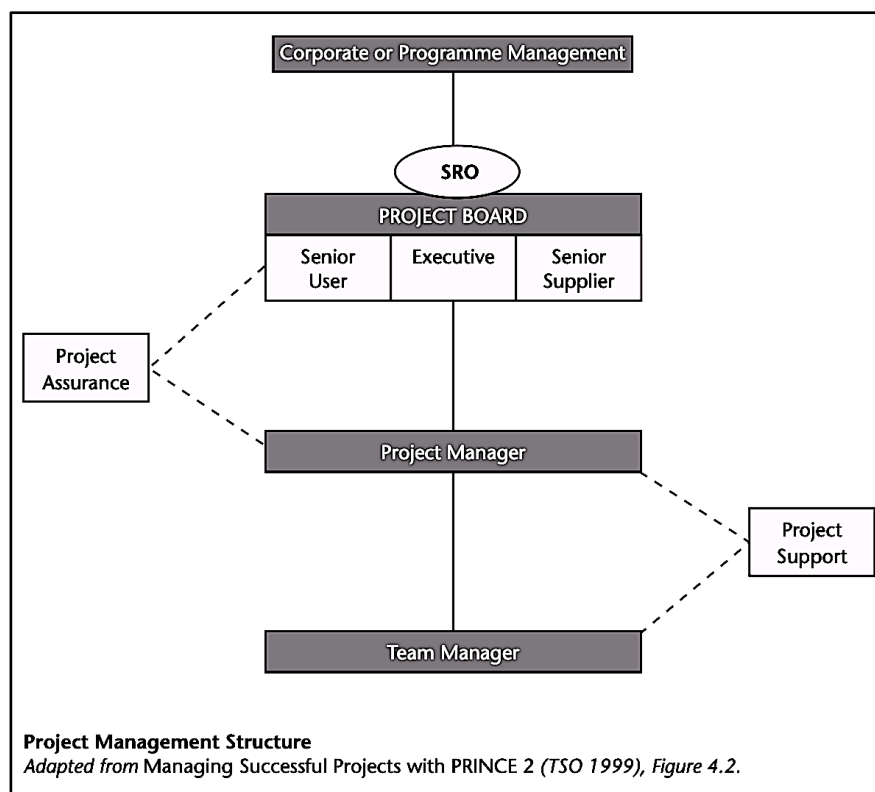
Note: Figure reprinted from *Successful IT: Modernising Government in Action* (CITU. 2000, 19).

This review introduced the SRO as a new accountability mechanism within departments, to provide oversight and direction for large IT projects. The SRO was to 'own' the project within the department and to 'ensure that a variety of strategic functions are performed that often cannot be supplied or managed on a day-to-day basis by either the project manager or the most senior management (CITU 2000, 15).' Since its introduction, the role of SRO has been extended across government to be deployed on all substantial projects, in all departments. The SRO was to be a senior official within the department, capable of taking a broad overview of project customer requirements, and able to represent the various departmental organisations which had an interest in the project. When introduced, the accountability of the SRO was usually against a series of project outcomes, created by the departmental sponsoring group responsible for initiating the project. Lupson (2007, 52) notes, that in the early 2000s, their accountability was only loosely defined within official literature.

The SRO was accountable to the sponsoring group and to the departmental permanent secretary, and could accompany the permanent secretary to Parliament when the project was reviewed by a select committee (Lupson 2007, 53). A 2009 government review of the application of the SRO role was largely complimentary about its introduction and its effect on project management (Stephens, Assirati, and Simcock 2009). However, it noted that the role was described by some as 'a poisoned chalice', with failure and a detriment to their careers as potential problems, whilst success as an SRO was not widely recognised. Ten years on, similar comments are still being made by the SROs in my research. Despite these concerns, the concept of the SRO has been regarded as effective and is now established across Whitehall departments. All major projects, and many less significant projects, have these positions within their governance arrangements.

Major Projects

Projects in the GMPP list represent the 'largest, most innovative and highest risk projects and programmes in government (IPA 2017, 4).' They are often large transformative ventures described as demonstrating 'the government's policy priorities: improving and enhancing the

UK's infrastructure, transforming public services, and maintaining the security of the nation. There are four categories of project in the portfolio and the 2017 report on the Infrastructure and Projects Authority outlined their planned whole life expenditure at that time:

- Transformation and service delivery: 40 projects to improve administrative processes within departments and representing £71 billion.

- Information and communications technology; 39 projects and £18.6 billion, providing ICT to many departments such as the NHS, HMRC, or DWP.

- Infrastructure and construction; typically for transportation, healthcare and education and represent 37 projects worth £222.5 billion.

- Military Capability; the MOD had 27 projects representing £143.3 billion.

The budgeted annual expenditure for these projects in the year 2016-17 was £24.6 billion which represented 4% of central government spending.

Some projects are technically complex and are about delivering a technical solution such as High-Speed Rail or the Future Aircraft Carrier programme. Some are substantial change projects which sit largely within departments, such as the Department of Health and Social Care Procurement Transformation Project or the National Crime Agency Digital Transformation Programme. Others confront almost intractable situations, and address 'wicked problems' (Rittel and Webber 1973, 155) which have a substantial impact on the country and its population. The introduction of Universal Credit, or the Work and Health Programme, both within the Department for Work and Pensions, are large activities and are dealing with incredibly complex and sensitive public issues. All these major ventures exist to create public value (Moore 1995, 4). They are undertaken by ministerial departments such as the Department for Work and Pensions (DWP) or non-ministerial such as Her Majesty's Revenue and Customs (HMRC).[20] The numbers of GMPP projects and their whole life cost are shown at table 2.1.

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[20] A non-ministerial department is defined as 'a department in its own right but does not have its own minister. However, it is accountable to Parliament through its sponsoring ministers'. www.gov.uk/guidance/public-bodies-reform

Table 2.1 GMPP project numbers and whole life costs

Period of Report	2014-15	2015-16	2016-17	2017-18	2018-19
Number of Projects	187	143	143	133	133
Whole Life Cost - £ billion	489	405	455	423	442

Source: Annual Reports, *Major Projects Authority* 2015, *Infrastructure and Projects Authority* 2016 to 2019

In 2019 there were 133 projects in the GMPP with a combined budget of £442 billion spread over the next 25 years.[21] My interviews took place with SROs from 9 departments, drawn from the 21 departments and non-ministerial departments that had undertaken GMPP projects during the research period. Details showing departments and project numbers is in the annex at table A1 on page 274, and the breadth of the projects is evident from the 2017 GMPP list which is at appendix 1. My research took place over the period 2015 to 2019 and during that period there were 272 separate GMPP projects, with 85 new ones joining the list and 141 leaving.[22]

Project Management

Project management does not have a long history within the civil service. Although the concepts of projects and project management had been used in the private sector since the 1970s, they were not equally represented in the public sector. Their use within government has accompanied the increasing focus on implementation over the past twenty years. The Cabinet Office identified project skills as an essential part of civil service activity in the first civil service wide capabilities plan published in 2013, undertaken as part of the civil service reform agenda. This described how successful implementation required staff to draw on project

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[21] The research period did not fully align with the IPA reporting dates but the data in the 2019 IPA annual report is quoted here.
[22] The Institute for Government annual report on the 'administrative health' of the UK government, the Whitehall Monitor 2020, contains an overview of the GMPP and current project performance (Freeguard et al. 2020).

management disciplines and methodologies (Cabinet Office 2013, 11). Project delivery is now recognised as the third largest civil service professional stream, after operational delivery and policy.[23] Together with the adoption of this new professional stream, the reform agenda promoted the training of project leaders.

Each project is managed by a project director and overseen by an SRO. Although there is no unified grading system across Whitehall, for a GMPP project the SRO posts are usually at DG level, one below a permanent secretary. The project directors are usually at the level of Director, one below a DG. Both project director and SRO are usually operating within the project's parent department. They are within the formal management structure and so both have a reporting line directly or indirectly to their permanent secretary. The project director will usually come from the project management professional stream. This is less likely for the SRO, who will often have a policy background. The split of responsibilities between the project director and the SRO, and their interaction with stakeholders, is not specifically defined although recent guidance has been issued by the Cabinet Office (IPA 2019b). The roles tend to divide into the project director looking and managing horizontally and down into the project itself, and the SRO looking horizontally and up towards the department senior executives and politicians. Project directors and SROs are now expected to attend project leadership courses at the Major Projects Leadership Academy (MPLA).[24] These courses cover project management in general and also aspects of their specific responsibilities and discussions on accountability within the public sector.[25]

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[23] Data from the Institute for Government's Whitehall Monitor 2020 shows staff numbers for Project Delivery at 14,320 in March 2109, compared to Operational Delivery at 225,990; Policy at 23,500; and IT at 11,280.
[24] The MPLA is an IPA sponsored course which includes training as a project reviewer and 3 residential weeks at Saïd Oxford Business School. It takes place over 16 months.
[25] The inclusion of *accountability* on the course had an impact on the interviews undertaken as part of this research. How that was managed is covered in the annex on research design and methods.

2.3 Accountable project leadership

In response to the reported leadership and project management shortcomings that had led to successive governments being criticised for poor project implementation, the government in 2010 recognised the need to address these issues across all departments. New accountability institutions were created and extensive new reporting mechanisms were developed to provide central government with information about the performance of projects. A substantial activity has developed within departments to provide the account holding forums with information.

> *There is a big industry involved creating reports. The amount of information you really need to make decisions is a fairly small subset of what is actually produced.* [#7]

Over the same period the leadership role of the project SRO has developed and their proposed accountability for the project is now contained in an appointment letter agreed between the Cabinet Office and the department.

New mechanisms

In 2011 the Major Projects Authority (MPA) was established within the Cabinet Office to provide central oversight of departmental projects, to provide assurance, and to monitor the performance of all major project implementation. The new organisation was based on the coordinating roles of the Office of Government Commerce and the Major Projects Review Group, which had themselves been established following the Treasury's report on Transforming Government Procurement in January 2007. On its launch the Cabinet Office Minister, Francis Maude, described the MPA as part of 'tough controls for major government projects, to improve performance in delivering on time and in budget.'[26] The MPA had a role in the development of accountability mechanisms encompassing project assurance and audit for the most significant and sensitive major projects. This was an important change, like setting up the Cabinet Office based Efficiency Unit in 1979 (Haddon 2012), or the Prime Minister's Delivery Unit in 2001 (Barber 2008). Those organisations had partly been established to address the problems of

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[26] 31 March 2011; https://www.gov.uk/government/news/government-launches-major-projects-authority

skills gaps, and the historically weak approach to implementation within the public sector and the centre of government (Haddon 2012, Harris and Rutter 2014). The Efficiency Unit acquired 'the institutional prerogative to act directly within the area of methods as well as to propose changes in other areas of public management' (Barzelay 2001, 65). Similarly, the MPA began to develop an oversight function, focusing on project accountability, as well as developing an approach to training and the creation of a skills base for project management within the civil service.

Alongside the creation of the MPA, the GMPP was another accountability mechanism created by the Cabinet Office, put together as a list of those projects that the Cabinet Office and Treasury regarded as most important to monitor. The projects were still undertaken by a department, and the departmental permanent secretary was still the accounting officer for the expenditure involved. The oversight functions of the MPA were an additional mechanism originating outside the department. The assumption was that:

> *making projects accountable to the Cabinet Office and Treasury would mean*
> *departments would place more emphasis on implementation and this visibility would*
> *provide the centre with an early alert to problems.*[27]

In 2016 two accountability mechanisms were amalgamated, by the merger of the Cabinet Office based MPA with the Treasury's Infrastructure UK, to form the Infrastructure and Projects Authority (IPA). The IPA acts as an accountability mechanism, having the remit to provide overarching supervision, project monitoring, and continuing audit, for all major projects. It also has a cross-government responsibility for the development of project management as a civil service profession. The impact of the IPA as advisor, auditor, assurer, and appointer, is discussed in the analysis of the interviews.[28]

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[27] Interview with MPA Director, 2015

[28] A number of SROs and project directors described it as ironic that the IPA as the body created to bring a coherent accountability to infrastructure and major projects should itself be accountable separately to both the Cabinet Office and Treasury, who they regard as having frequently contradictory demands on project performance and outcomes.

With such significant sums at stake, creating the MPA, and then the IPA, gave the Cabinet Office, and the Treasury, formal oversight of departmental projects and their expenditure. Departments remain responsible for initiation, implementation, and internal audit of projects, but the IPA now routinely undertake the external audit and assurance of them. Within each department there was a role created as 'Head of Profession for Project Delivery' (HoPP), although this was usually undertaken alongside the individual's normal role. These officials, at director or director general level, have a role supporting and encouraging the development of project skills within the department. Staffing projects is a departmental responsibility, but the scale and sensitivity of these projects makes their senior leadership very important, both to departments and to the government as a whole. Consequently, the SRO became a role which the Cabinet Office regard as falling within its sphere of influence.

Reporting on the project: *Feeding the Machine*

The project director is responsible for the provision of a considerable amount of information about the project to the rest of the department and wider government, which is produced by their project management office (PMO).[29] Much of this will be called upon by the SRO to meet their own accountability requirements. Accounting for the activity of a large public entity in this way is not unusual, and forms part of the role of many public officials. When considering accountable officials in the Netherlands, Schillemans (2015, 436) described their investment in 'accountability capacity' where they bring together staff to handle the various data and information requirements of their forums. Their attempts to combine reporting schedules are an approach to avoid accountability becoming a distraction from their core activities. This may also be the same for the UK project director, but in the case of the SROs, the accountability activity is their core role. They acknowledge the need for large teams to create and manage the project information needed to keep all forums briefed.

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[29] Project Management Office. An internal organisation which provides coordination and control, and which disseminates information within a project and to stakeholders.

In my team I have 12 managers in the project management office, excluding the eight

who are just devoted to planning, but the others are all feeding the machine. [#8]

There is a lot of feeding the machine with these committees and the IPA and

Treasury. And it often requires different information in different directions and we

would love to have one set of things that you could draw on that you could just pluck

out and feed that beast here, and this other beast over here, and all the things that

different people are interested in. [#9]

The project management reporting and cross government briefing mechanisms are a
considerable load on the project and its leadership.

Every quarter there's a GMPP review, there's three reports to the Department, there's

going to be at least one programme board a month, weekly briefings to the management

board, weekly reports to Treasury, updates to my colleagues, and any number of other

you know PQs[30], and replies, you know ... things like an MP raised a PQ, but he wasn't

happy with the reply, and went to the PAC and you can imagine how much time that

took up, so there's all of this stuff going on. I've got a really good PMO guy who I

worked with some years ago whose come in and he's taken a look at what we are doing

and how we're doing it, and whilst this is being done quite well the fact is that we

duplicate masses of effort here, and he reckons we produce over a hundred different

accountability reports and briefings every month. [#10]

These routine, and onerous, account giving activities are one aspect of the role usually

undertaken by the project staff, and frequently operate without any active involvement of the

SRO. Daily, weekly, monthly and quarterly reports and data are despatched across the

departmental and government estate, electronically and on paper. With an efficient project team

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[30] PQ. 'A Parliamentary Question (PQ) is a question put formally to a government minister
about a matter they are responsible for by an MP or a member of the Lords. PQs may be asked
orally - during ministerial question time in either Chamber - or in writing. They are used to seek
information or to press for action from the Government.' (https://www.parliament.uk/site-
information/glossary/parliamentary-questions-pqs)

this is not a significant burden for an SRO. However, the role of SRO requires their personal interaction with their forums, and when there are problems it is the SRO who will be presenting the account. My discussions with SROs focused on this subjective aspect of how they feel about their personal relationships with the forums and how they, as individuals, manage them, rather than how their staff deal with the routine reporting mechanisms.

The increasingly accountable SRO

The SRO is appointed jointly by the chief executive of the IPA and the permanent secretary of the relevant department. This selection and approval process is itself an accountability mechanism. The role of the SRO is formally defined in the letter that accompanies their appointment. Within the letter, most departments list the objectives and performance criteria for the project at a high level, and cover tenure, the state of the project on their appointment, and some commentary on the extent and limit of accountability within the role. The letters require the agreement of the SRO to the terms of their appointment, and after they have been agreed they are usually published on their departmental website. The letters have an annex that describes the role and refers to the Osmotherly guidance. This annex highlights their personal accountability. The annex to the appointment letter defines the SRO accountabilities, but at a high level. The text shown here is taken from the letter given to the SRO of the Universal Credit programme in the DWP (www.gov.uk 2018a). [31]

- 'Ensure the programme is set up for success

- Ensure that the programme meets the objectives and that projected benefits are deliverable

- Develop the programme organisation and plan

- Monitor and take control of progress

- Ensure problem resolution and referral processes are appropriate and effective

- Ensure that the programme is subject to review at appropriate stages

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[31] The inclusion of this appointment letter does not indicate that the individual was part of the research. The appointment letters are available on line, and this one is a typical example.

- Manage formal programme closure'

It also requires them to

- 'Provide appropriate support, steer, and strategic focus to the Programme Director.'

An SRO may not necessarily be an experienced project manager, or have any former experience with projects. Increasingly, the IPA is addressing this by requiring them to attend the MPLA. This is part of a wider attempt to improve policy delivery and project implementation by introducing professional project management skills to the civil service. However, for many SROs their project accountability is still a small aspect of their role as a departmental DG. There are some projects which are considered so critical and of such magnitude that they warrant a full time SRO but for most it is not a full-time appointment. Most SROs have a *day job* [32] which occupies most of their time and they can find themselves dedicating less than 20% of their day to their allocated project. Some described the reality as representing only 5% to 10% of their time. There are also individuals who are accountable for more than one GMPP project. Using partial data, provided to the author by the Cabinet Office in 2019, a list naming the civil servants as project SROs showed that almost 30% of projects shared their SRO. One SRO was listed as accountable for six separate projects. The Cabinet Office provides guidance to departments about the role and accountability of the SRO (IPA 2018b, 2019b) but the most significant change in their accountability was the revision of the Osmotherly rules in 2014.

2.4 Revising Osmotherly – the SRO becomes visibly accountable

Although used across Whitehall, the Osmotherly Rules are not accepted as a formal procedure by Parliament. Despite this they are regarded as a government document, with the title 'Giving Evidence to Select Committees' and are part of the documentation available to members of parliament (Horne 2015). Their most recent revision was announced in October 2014 when

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[32] The term frequently used to describe their main role, to which being an SRO was an adjunct.

Francis Maude, as Cabinet Office Minister, made a statement to Parliament on their update (www.gov.uk 2014). Maude had previously suggested that 'a requirement that civil servants in charge of big projects account directly to Parliament would toughen the relationship with ministers (Neville and Parker 2013).' This followed a report on accountability in government, by the Institute for Public Policy Research, which recommended that major project SROs be made directly accountable to Parliament to strengthen the ability of parliamentarians to scrutinise their performance and thereby improve the external accountability of departmental officials (Lodge et al. 2013, 119).

The 2014 Revision

The Osmotherly rules are based on the doctrine of ministerial responsibility and make clear that 'civil servants are accountable to ministers who in turn are accountable to Parliament'. They define the official's role in providing evidence being to 'contribute to the process of ministerial accountability not to offer personal views or judgements on matters of government policy' (Cabinet Office 2014, 4). The new advice, covering major projects, states that:

- (Paragraph 9) 'Senior Responsible Owners of major projects can also be asked to account for the implementation and delivery of major projects for which they are responsible.'

- (Paragraph 26) 'Senior Responsible Owners (SRO) for Major Projects (as defined in the Government's Major Project Portfolio (GMPP)) are also in a special position in that they are expected to account for and explain the decisions and actions they have taken to deliver the projects for which they have personal responsibility. This line of accountability, which should be made clear to SROs in their published SRO appointment letter, relates to implementation (not policy development) for the project though the SRO may of course have been involved throughout the development of the project'

- (Paragraph 28) 'Where a Committee wishes to take evidence from an SRO of one of these major projects it will be on the understanding that the SRO will be expected to account for the implementation and delivery of the project, as defined by published SRO appointment

letters approved by the relevant Minister, and for their own actions. Appointment letters will make clear the point at which an SRO becomes directly accountable for the implementation of the project in question. The SRO will also be able to disclose to the Committee where a Minister or official has intervened to change the project during the implementation phase in a way which has implications for cost and/or timeline of implementation. In this respect the SRO should also be able to disclose their advice about any such changes.'

These most recent changes have an impact on the formal accountability relationships between senior project officials, ministers, and Parliament. Parliament is now able to call the SRO to attend a public committee to account for their projects. Given the importance of appearing before parliamentary committees, for both ministers and civil servants, it might be imagined that senior project officials would describe the mechanism as clear and simple. The guidance itself may be simple but the interpretation by officials, and how they see it being used, is less clear. Most referred to the Osmotherly rules when describing their roles and their appointment and frequently described their appointment letter, published on government websites, as their *Osmotherly letter*. I will continue with that convention here.

> *What accountability is about in a major programme context, with my SRO hat on, I will start off with the Osmotherly rules, which outline accountability.* [#11]

> *The fact that it is written down, in the Osmotherly letter, that SROs are accountable to Parliament, and the rules as well, I think that is something that quite a lot of SROs take very, very, seriously.* [#12]

> *In terms of my PAC Osmotherly letter it was more theoretical thing in the background really.* [#13]

The Osmotherly guidance is referred to within the letter appointing an SRO. Although most were aware of the Osmotherly section in their letter, and when they took on the role of SRO, it was not obvious to everyone:

> *Everybody's Osmotherly letter is slightly different for various reasons but I hadn't noticed until it was pointed out to me that as SRO, I am directly accountable and have the right to report to the PAC, I didn't know that.* [#14]

Whether or not they fully understand the implications of the Osmotherly guidance when they take on the role it forms a significant aspect of the SROs perception of their activity once they are actively accountable for a project. The importance of accountability to their role is evident from the phrasing of the Cabinet Office and Treasury ministers' foreword to the 2015-16 major projects report (IPA 2016, 1) which describes accountability within the context of both a virtue and mechanism. As a virtue, the report notes that:

> 'High calibre leadership and accountability are vital for projects to succeed, and the IPA is at the centre of a change in culture that will see project management and delivery become sought-after career paths within the Civil Service'.

Then as a mechanism by which accounts must be given it points out that:

> 'Furthermore, leaders are being held to account better for the projects for which they are responsible. New project owners are now required to sign up for a significant period, while accountability of existing project owners is being strengthened'.

The strengthening that they reference includes the new Osmotherly mechanism, and the consequent relationship with the PAC.

Parliamentary oversight of the SRO

In the past, ministers could determine who attended select committees on behalf of the department. The permanent secretary, as the departmental accounting officer, is accountable to Parliament for 'the stewardship of the department's resources'. SROs may have accompanied the permanent secretary to a committee if it was the subject of a significant part of their deliberations, but only to support their permanent secretary. The new guidance removes that optionality from the department and places the SRO directly into the accountability relationship with the select committee. The impact is shown in figure 2.2. The change in the relationship

removes the minister from this chain and specifically makes major project leaders directly accountable to Parliament through the committee system. As an SRO commented:

> *I think the extent to which ministers see themselves as being accountable and having kind of despatch box risk for this…. You know I think has got a bit of catching up to do. In fact I was talking to the Minister of State last week explaining how our governance is set up and who does what and he was somewhat surprised that he didn't appear anywhere in the governance arrangements, and I explained to him that whilst I personally worked in a very old fashioned way, and might involve him, the latest iteration of this was set up in this way and he needed to understand that* [#15]

Figure 2.2 Project accountability to select committees
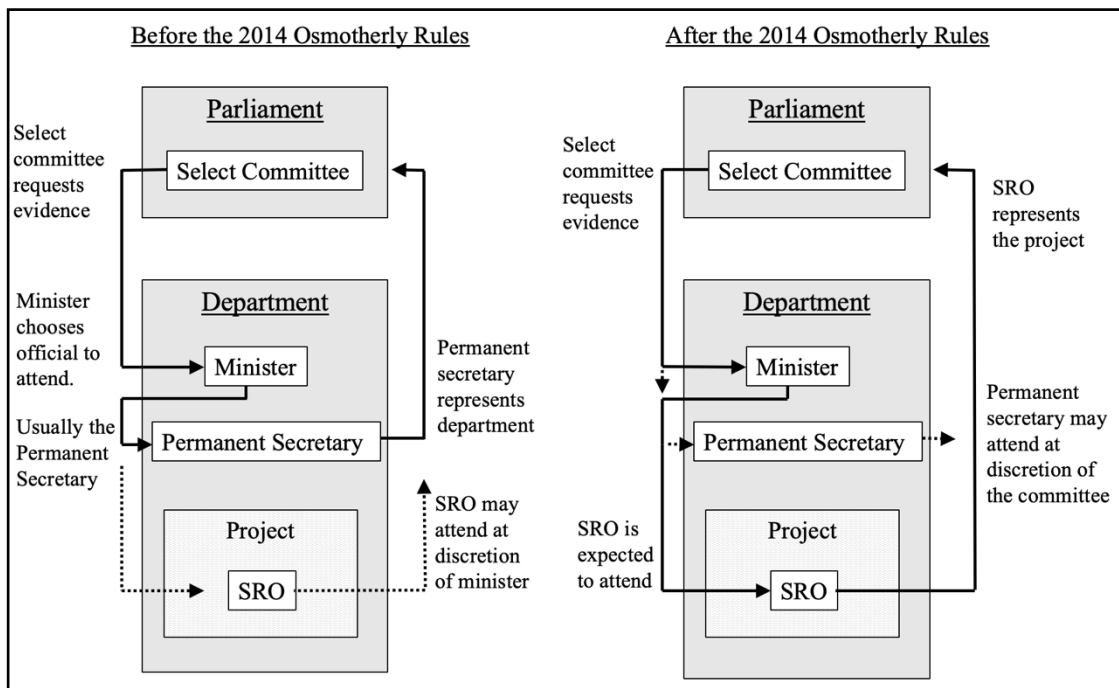
Note: On the left, before the 2014 amendment, the select committee request for evidence would normally result in a permanent secretary giving evidence, with the SRO if the minister felt it appropriate. After the amendment, on the right, the committee can summon the SRO directly and it can decide whether or not the permanent secretary attends.

A briefing note on the Osmotherly rules from the House of Commons Library (Horne 2015) draws the attention of members of Parliament to some 'general principles':

'4. The *Civil Service Code* makes clear that civil servants are accountable to Ministers who in turn are accountable to Parliament. It therefore follows that when civil servants give evidence to a Select Committee they are doing so, not in a personal capacity, but as representatives of their Ministers.'

'5. This does not mean that officials may not be called upon to give a full account of government policies, or the justification, objectives and effects of these policies, but their purpose in doing so is to contribute to the process of ministerial accountability not to offer personal views or judgements on matters of government policy - to do so could undermine their political impartiality.'

These sections reinforce the concept of ministers being accountable for their departments, whilst at the same time allowing their officials to comment both on policy and implementation, albeit to contribute to the practice of ministerial accountability. The implementation of the revised rules can be considered as another step in the long running dance between Parliament and the government of the day, about the transparency and partisanship of the civil service over the past few decades. For Dame Margaret Hodge, the chair of the PAC from 2010 to 2015, they do not go far enough to enable Parliament to fully scrutinise the activity of government departments and their civil servants: 'These reforms are welcome, but they are tinkering at the edges. The lack of transparency and accountability has frustrated many for a long time' (Hodge 2016, 358).

<u>Politicising the relationship between civil servants and ministers</u>

Two important features are contained in paragraphs 9, 26, and 28 of the Osmotherly rules shown above at page 74. Paragraphs 9 and 26 introduce the relationship between the official and the PAC, and allow for SROs to be called to give an account of their project at a committee, although specifically for implementation rather than policy. Paragraph 28 goes further and

makes reference to officials being *'able'* to disclose the intervention of another official or minister in a way that affects the achievement of project deliverables. This broadens the evidence they can give about their projects to specifically mention intervention by others. When describing the new mechanism during the interviews, the officials noted both of these aspects and how they affected their feelings of accountability. I emphasise '*able*' as that particular term was frequently raised by SROs during the interviews. They perceived this *disclosure* aspect as moving the hearings into the area of politicisation. Asking SROs to initiate or engage in disclosure about ministerial intervention, as Paragraph 28 suggests, pulls them into a party political environment, where Grube (2014, 421) argues that the loss of traditional anonymity may be damaging and that inviting officials to support or criticise ministers is to invite increasing politicisation of the civil service.

As managerialism was introduced in the form of executive agencies in the 1990s, the espoused aim was to improve civil service management by empowering officials and giving them more control over resources, whilst at the same time asserting ministerial control over their activities (Hood and Dixon 2015, 32). But these intentions were inherently contradictory, as Aucoin (2012, 178) reasoned. The argument for *managerialisation* was that empowered managers had more internal authority to deliver outcomes to meet the policy directions of ministers, whilst it did not interfere with the independence and impartiality of the civil service. Following concerns that the impartiality of officials was being reduced, Aucoin introduced the concept of New Political Governance as a 'corrupt form of politicization' of the public administrator (p. 178). This attempts to gain partisan advantage from the civil service by, inter alia, 'an assumption that public service loyalty to, and support for, the government means being promiscuously partisan for the government of the day' (p. 179).

An argument in favour of the new Osmotherly guidance is that it seeks to reduce this partisanship by enabling SROs to identify and comment on the intervention of their political masters in the implementation of their projects. As such the rules are one mechanism that could be seen to meet Aucoin's search for institutional change that retains civil service impartiality whilst retaining management accountability (p. 196). On the other hand, they can also be

considered as a means of drawing the official into a political battle, fought out within the confines of a committee hearing. Retaining impartiality is potentially at risk if the SRO embraces the full potential of the new guidance, yet without the ability to probe the civil service perspective on their ministers actions, parliament is likely to remain unable to hold either of them fully to account (Hodge 2016, 359).

<u>Accountable, but unlikely to account in Parliament</u>

Whatever their own views of their political impartiality, for most civil servants, even those in the senior civil service, it is unlikely to be tested by a call to a select committee. Although permanent secretaries may be regular attendees, below the level of a DG an appearance in front of a select committee would be extremely rare. Officials may watch their permanent secretaries' performance on the parliamentary website but it is unlikely that many junior civil servants will have much knowledge of the Osmotherly rules, and for most they will be of little relevance.

> *I think if you were to take a survey in any government department and just randomly pick people from each organisation and asked them if you could explain those Osmotherly rules to me, they'll say who is Osmotherly, as it's not really got the traction within departments.* [#16]

Most SROs recognise the low possibility of being called to account by the PAC and frequently questioned the likelihood of them ever having to call on the rules. [33]

> *This kind of armchair accountability which I think Francis Maude had in mind when he set this stuff up, I don't think it's really effective, it becomes a place for mischief, to be honest. If the greater part of what we're doing in the department failed tomorrow I don't think most people would fight to point the finger at me as I think there's other heads to go after. I think that a lot of people would go down there before me.* [#17]

---

[33] Details of the likelihood of an SRO attending a committee hearing are covered in chapter 7.

> *I don't know whether that works in practice, because the governance within the*
>
> *department is such that I can't see why any SRO would go off to a PAC over the head of*
>
> *the accounting officer.* [#18]

Few SROs may expect to attend the PAC, but the NAO were equally concerned that there were
not enough SROs being called to appear and justify their projects.

> *Not all seem capable of the full role, and they don't appear very visible during the*
>
> *reviews or at hearings. The permanent secretary seems to want to do all the talking if*
>
> *there is any problem. SROs ought to be much more authoritative, and able to push*
>
> *back against the policy prioritisation approach of the senior teams.* [34]

There may be merit in the NAO comment about lack of visibility by SROs at the formal
investigations into their projects and the subsequent hearings, particularly for those for whom it
is an unusual event. However, whatever the NAO may feel, the prospect of a PAC hearing still
looms large in the minds of most project leaders, as became evident in the interviews.

Conclusion

The scale and complexity of public projects requires competent leadership. The history of
specific incidents, where projects were perceived to have failed, led to concern about project
management and the accountability of project leadership within departments. A variety of
mechanisms have been introduced across government to improve the implementation of major
projects. The role of SRO was introduced to provide a senior owner to improve project
accountability within departments. Institutions such as the MPA, more recently the IPA, and
the GMPP were created to provide central government oversight of departmental activity. The
CEO of the IPA and the departmental permanent secretary are now jointly responsible for
appointing the SRO, and signing their appointment letter, creating another accountability
mechanism.

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[34] Interview with senior NAO official, 2019

The names of SROs now appear on departmental websites along with the letters of appointment, often with the annex that includes the statements indicating their personal accountability (www.gov.uk 2018a, b)[35]. Despite the wording in the guidance, many officials explained that the appointment letters rarely accompany a fully scoped and agreed understanding of their responsibilities, formal reporting position, or accountability. Nonetheless, whether or not it is effective in defining the role, the publication of these letters is seen to concentrate the focus of *project accountability* onto specific roles within the department. The direct accountability of SROs to Parliament has recently been defined in the revised Osmotherly rules, although many feel that they are unlikely to ever be called to a PAC hearing to account for their actions or project performance. However, whereas before the new guidance was issued they only attended committee hearings in support of their permanent secretaries, they are now capable of being drawn into the committee hearings where they are personally accountable for their projects.

The SROs are senior officials operating where *political* and *managerial* accountability overlap. Whilst elected officials are accountable to parliament for the activities of their department, and ultimately answerable to the electorate who are able to vote them out of office, it is the SRO who is accountable to the minister, and now to Parliament, for the implementation of their major project. This new mechanism has thrust the SRO into a very visible accountability, one that was previously reserved for their permanent secretaries, as departmental accounting officers. Government implementation was previously under the supervision of largely anonymous individuals within their own departments. The accountability of the SRO is now potentially publicly exposed. They might have to account for their projects in televised parliamentary committee hearings. For the highly visible SRO, accountability is the principal aspect of their role. How they manage that is the subject of the empirical examination which follows.

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[35] Any reference to particular SRO letters does not indicate that those individuals took part in the research. The letters are available online and were chosen for illustrative purposes only.

Chapter 3. Feeling Accountable

My programme is not trivial by any means but it's through life cost is less than one billion pounds, so its small beer compared to most GMPP stuff. It is still really difficult to keep on top of everything, particularly with so many people looking at how it is going. Its right that we are accountable as there's a lot at stake, but these are tough jobs at times. [#19]

At the top of a government department, the civil servants are used to dealing with big problems and big numbers. Yet meeting an SRO who is accountable for the expenditure of billions of pounds, can confound expectations. There is none of the paraphernalia that might be expected with senior leadership roles, no large offices or imposing oak panelled rooms. Nor does the conversation revel in the grand scale of the enterprise involved. There is a calm and unassuming explanation of the scale and complexity of a major project, and the consequent scale and complexity of the network of stakeholders associated with it. It was impossible, listening to their descriptions, not to be impressed by the size of these projects, and their importance to their departments, and often to the nation as a whole.

I had to strip out another billion worth of savings through life, which was a challenge given the rest of the department was really constrained over that period. [#20]

Because the commitments that have been made here in terms of revenue and expenditures are many billion pounds over the next 20 years, we appreciate that there are many private sector companies very interested in the availability of this money. [#21]

These comments epitomise their description of the role of SRO and their project's place within the department's activities. Delivered without any hubris, it was evident that SROs recognise the scale and importance of their projects.

Their conversations include many references to the challenges inherent in managing very large enterprises within the public sector. Almost any job in the senior civil service, dealing with implementation and delivery, and situated in domains where authority is negotiated and managed, could be described in a similar manner.[36] What was being stressed here was that the jobs were made particularly difficult by circumstances specifically related to major projects and their associated accountability. When I asked SROs to explain how it felt to be in the role and accountable for a major project some topics were referenced repeatedly. There was a consensus about five particular aspects which appeared in almost all the interviews. These address the nature of how it feels to be an SRO, rather than a departmental DG.[37]

First is a recognition that they are accountable for enterprises that are important to the government, and the nation, and these are at a scale that makes them inherently difficult. Second is recognition that this entails managing complex and conflicting stakeholder relationships, where governance is not only multifaceted but blurred, and the numerous accountabilities are difficult to manage. The third is that these roles are subject to intense scrutiny, and that blame and reputation management are significant features of the environment. The fourth is that being held accountable is felt to be a legitimate aspect of the role, and important in senior public service positions, even if it is often ill defined. Finally, despite the pressures that accompany these positions, and whilst explaining their views on accountability, almost all the SROs described how much they enjoyed their roles.

Being accountable in these senior positions involves being under pressure and intense scrutiny. The importance of these projects to the department and the government, and in many cases the nation, mean they are more subject to examination and question than many other public management roles. To understand how it feels to be accountable in general we need to consider the nature and strength of the pressure that SROs feel under in these roles. The five

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[36] The Institute for Government's 2020 review of the performance of central government, the Whitehall Monitor, provides an overview of the scale of government commitments, budgets and staffing (Freeguard et al. 2020).

[37] Most SROs are at DG level, Senior Civil Service Grade 3 (SCS3), although a few are Director level, at SCS2. (IFG 2019)

themes address different aspects of their experience of these stressful roles, and provide the context for the analysis of accountability relationships with different forums. This chapter addresses each of these general themes in turn.

3.1 Important and difficult jobs at scale

The first challenge that the SROs described was the size and complexity of their projects. This was not about their accountability, but about the sheer scale of the enterprise for which they were accountable. They are aware that it usually involves almost every aspect of a department and many other parts of government. The discussions touched on policy, implementation, IT, finance, audit, public relations, security, and human resources. The role of the SRO is defined in an IPA publication 'The role of the Senior Responsible Owner', which provides an indication of the complexity of the job:

> 'The SRO is accountable for a programme or project meeting its objectives, delivering
> the projected outcomes and realising the required benefits. He or she is the owner of
> the business case and accountable for all aspects of governance (IPA 2019b, 6).'

The guidance explains that the role includes being 'the primary risk owner', must monitor progress on 'the project and the context within which the project will deliver' and is ultimately responsible for 'ensuring successful transition to live service or operations'. This is a substantial list when considering some SROs spend only a fraction of their working time dedicated to the role.

The Scale of GMPP projects means they are complex

Large projects are difficult to undertake. Flyvbjerg (2017, 6) identifies the challenges in delivering major projects, to schedule, to cost, and with the planned benefits. The SROs comments supported his argument that these are not just bigger versions of smaller projects, but are totally different in 'terms of their level of aspiration, lead times, complexity, and stakeholder involvement', and are therefore 'a very different type of project to manage.' Flyvbjerg describes ventures with whole life costs exceeding US$ 1 billion as 'megaprojects' which are

'over budget, over time, over and over again' (Flyvbjerg 2014, 11).[38] He notes that 'decision making, planning, and management are typically multi-actor processes involving multiple stakeholders, both public and private, with conflicting interests.' This multi-actor conflict was evident in the SROs' accounts.

As the most significant projects within government, the GMPP projects are particularly complex activities. The first aspect of this was the sheer size of the venture, in terms of future expenditure, staffing, timescales, and often the impact on the department or the public. They had to be aware of all these different aspects of their project and be capable of responding to questions about them. Whilst they had staff to support them, this is a wide mandate to manage.

> *Projects that tend to be done by government, certainly the major projects, are, almost by definition, they are going to be complex programs. [#22]*

> *My programs are quite complex, and they have multiple funding departments and in some cases they have devolved administrations as well. [#23]*

> *With the scale of the programme we've got I have accountabilities through to Treasury and Cabinet Office, in relation to our spend, we are on the GMPP list and so we have the IPA, and there is a departmental portfolio and then there is a portfolio within this individual programme so each of those are involved in the scoping and the delivery of the programme. [#24]*

Getting strategic alignment is difficult

The second aspect influenced by the scale of the ventures is the wide variety of organisations and individuals who feel they have some interest in the project and its outcomes, and this network of relationships is substantial. This was raised repeatedly by SROs when describing the entities that they had to work with, either providing them with information about outcomes and

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[38] He described these issues at an investigation into major projects held by the Public Administration and Constitutional Affairs Committee (www.parliament.uk 2018b).

processes, or to get their engagement to provide resources, or sometimes just to get them to stay out of the way.

> *We are moving things quickly now, so part of my job is just keeping some stakeholders*
> *as far away as possible, so they don't get in the way, as rocks in the road, or blood on*
> *the tyres.* [#25]

With so many stakeholders SROs frequently described the difficulty they faced getting them to agree on almost any aspect of the expected outcomes for their project. Much of the conflict comes from the importance to diverse stakeholders of different aspects of the necessary inputs or outcomes.[39] They described it as particularly challenging to work in a project environment where there were so many interested parties, who often disagreed about the expected outcomes.

> *It's fair to say not everybody is looking at the same angle and there are lots of different*
> *perspectives on what people want out of the programme.* [#26]

> *It feels nerve wracking and anxiety causing, and yes I wake up in the middle of*
> *the night at least one night a week, processing stuff about this particular programme.*
> [#27]

On the other hand, for some the lack of alignment led to a very different outcome.

> *I think we are in an awkward place where accountability is complex, so an*
> *interesting question to ask is do I wake up in the morning sweating about*
> *delivery. Should I, yes absolutely, because my entire career has been consumed*
> *by that, but do I at the moment, no, not really. I wake up in the morning having*
> *had a refreshing night's sleep, I have a wholesome and nutritious breakfast and I*
> *arrive in work refreshed and ready for the day. I shouldn't. I should be far from*
> *that, I should be wrecked, biting my nails, and chain-smoking and borderline*

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[39] One SRO produced a list of the interested stakeholders for their project: Within the department: the programme board, investment committee, strategy group, two operational DGs, the finance director, commercial director, HR director, Internal Audit, the media team, ministers special advisors, and the minister and permanent secretary. Across government were units in Cabinet Office and Treasury, three other departments including four internal committees with their own stakeholders. Twelve private sector contractors alongside three groups of consortiums, including major IT providers and advisory consultancies. They had created the list in the ten minutes before we met and apologised for it being incomplete.

> *neurotic because that's the role, that has been my previous experience, but I don't*
>
> *here because it is so difficult to pin down responsibility to an individual in any*
>
> *group and say this is absolutely your thing because they always have the option*
>
> *of going… Ah yes well but, … the Treasury didn't want me to do it that way, or*
>
> *the Cabinet Office have a different view, or whatever, and so as I see it this*
>
> *erodes and dissolves accountability.* [#28]

Few conversations exhibited as relaxed a manner as the quote above might suggest. Whilst not worn out by concerns about getting stakeholder alignment, this official was still working hard to manage their workload. Rhodes (2005, 18) described the 'punishing schedule' at the top of departments, and from my own fieldwork it was evident that the workload faced by current SROs was equally intense. In many of the interviews it was obvious that officials were extremely tired and had been working long hours over an extended period.

Managing the requirements of different stakeholders is a challenge for any organisation. Freeman (2010, 46) defined stakeholders as 'any group or individual who can affect or is affected by the achievement of the organization's objectives.' He described the purpose of strategic management as charting the direction for the organisation with all these stakeholders in mind. In a similar way, the role of the SRO is the strategic management of the project, cognisant of all the various account-holding forums. All the SROs described the differing expectations of the various forums as more significant in the project environment than in their other senior civil service roles. Their accounts make clear that where there is disagreement between forums the role becomes increasingly difficult. Two features of this conflict were evident. First was the challenge of getting coherence about the required outputs and objectives of the project, and the resources needed to deliver it at the outset. The second was their experience of dealing with different expectations of the account-holding relationships and process. Even before being held to account for their actions, the officials were having to manage differing expectations about what their role was meant to achieve.

> *What the minister thought was happening, and what the Treasury thought was*
>
> *happening, and what the programme thought it was doing, were completely at odds*

> *with one another, I wasn't there very long, but my overwhelming view, in terms of what*
>
> *I did when I was there for a year, was basically trying to align those things.* [#29]
>
> *When I inherited the SRO job last year there wasn't strategic alignment on the*
>
> *way forward under different stakeholders.* [#30]

Nor can they fall back on a clear definition of what they are meant to do from their Osmotherly letter. A recurring element of the discussions was a sense that beyond the basic instruction within their letters, which some described as *deliver the project objectives* (see page 72), it was difficult for them to define exactly what they were accountable for and what the project was meant to achieve, for all the different account holders. The SROs describe an evident lack of strategic alignment between the expectations of all the interested forums. Dealing with forums having different perspectives, and the *multiple accountability disorder* described by Koppell (2005), meant some participants described themselves as just about coping with almost impossible roles. This is a challenge faced by many SROs even before they get into account-giving behaviour, as they attempt to establish exactly what the project is expected to deliver, with what resources, and to what timescale.

> *The department doesn't really have a coherent view. My impression is that the Perm*
>
> *Sec and the Treasury might sign off at the start but even by the time the letter gets*
>
> *printed they seem to have a difference of opinion, and the rest of the management board*
>
> *have their own views on what they thought it all meant when the business case was*
>
> *agreed.* [#31]

Before accepting the role, they may have discussed it in detail with their permanent secretary and other colleagues and will have a good idea of the objectives and performance criteria for their project. These high-level points will form part of their appointment letter. A typical example is the Department of Work and Pensions letter issued to the SRO for the *Fraud, Error and Debt (FED) Programme* in September 2019. The letter outlines the project objectives and the SROs performance criteria. This information is in the public domain, and published on

government websites, although detail is reserved for confidential conversations and correspondence within departments. The wording is a mixture of accountability as values and as mechanism, and at a high level. [40]

> 'As SRO you are personally responsible for delivering the programme. You are held accountable for delivering its objectives, benefits and policy intent, for securing and protecting its vision, for ensuring it is governed responsibly, reported honestly, escalated appropriately and for influencing constructively the context, culture and operating environment of the programme.'

In the section on objectives and performance criteria, the high-level objectives of the programme are to:

> 'Ensure the programme is fully aligned to the department's overarching objectives through the delivery of projects and initiatives which support realisation of the vision; Support the department in the delivery of the FED vision to reduce levels of fraud error and debt across the benefit and tax credit systems; and deliver systematic controls across the benefit and credit systems, adapting processes and implementing systems and new ways of working to reduce FED by the end of the Programme.'

This illustrates the high-level definition of the 'for what' aspect of accountability contained in an appointment letter. SROs frequently commented that it was difficult to get effective definition of what exactly they were to be accountable for, other than *deliver the business case*, or achievement of the type of high-level objectives shown above. Their perception was that there were so many institutions that wished to hold them to account that this high-level public statement was rarely enough to enable them to define, or defend, the boundaries and processes of their accountability. These challenges form part of the analysis of specific forums covered in chapters 4 to 7.

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[40] This appointment letter is available on the government website and was selected as an example. Its use does not indicate the recipient's participation in this research. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/842021/appointment-of-senior-responsible-officer-fed-update.pdf

SROs explained the problem of deconstructing the general statement '*I am accountable for the project*' to achieve an understanding of what that actually meant. Some forums held them to account for delivering outcomes (ministers, permanent secretaries, select committees), some for controlling expenditure (the Treasury, investment committees), some for timing (ministers, operational DGs) and others for processes (commercial or IT sections within the Cabinet Office). Many noted that significant aspects of their remit appeared to lie in domains outside their project and over which they had limited influence. The *for what* and *how* questions became focused on different aspects for each specific forum. Their comments made clear that it was not possible to provide a simple answer to the simple question of 'what are you accountable for?' The simplest response of '*the project, soup to nuts*' [#32] contains an accumulation of all of their different accountability relationships and the various mechanisms which apply to them. It is necessary to examine each one to completely understand what an SRO thinks they mean.

When the discussion turned to specific forums, the nature of the conflict and the challenges in achieving coherence becomes more apparent. They were always facing some form of misalignment between stakeholders and managing this required a major part of their activity and also left them feeling personally exposed.

> *You just never have that sense that there is agreement about everything. It's not unusual in this department but getting most of the stakeholders on the same page would be really helpful. There's always one or two who take a contrary position about any aspect of what we are trying to get done here. It's just a general feeling every day that alignment is missing. It always leaves you a little exposed.* [#33]

> *It is very difficult to cope and be fully accountable when you've not really got control and you've got people who are able to, perhaps heavily, influence the way that things go.* [#34]

The comments chime with those of Glidewell and Hargrove's *impossible jobs* which described roles 'a class apart from other public management positions', where it was 'literally impossible to achieve any of the manifest objectives of the ascribed mission' (1990, 4). One of

the dimensions they identified which contributes to the difficulty of those roles, and which is evident here, is the complexity created by stakeholders who had conflicting expectations. The metaphor of the *impossible job* is a powerful one, as is the sense of *coping* as a model within public management. As Dobel (1992, 146) points out when considering these metaphors, 'empirically the stories sound familiar'. It is therefore not surprising to find similar stories being told by the leaders of the government's major projects. This sense of coping in a complex environment is not unique to major projects and as Dobel (1992, 146) notes, it could be described as a position faced by almost any senior public official.

On the other hand, most GMPP roles, whilst exceedingly difficult and complex, are clearly not impossible. Programmes do get finished and there are many successful projects that leave the GMPP list because they have been delivered. In 2018 this number was 26 leaving from 133 on the list (IPA 2018a, 7), and a further 19 left in 2019 (Freeguard et al. 2020, 61). However, considering the portfolio of projects, the NAO have been critical of the number which leave without an exit review to confirm they actually were successful (NAO 2018). While these project leadership roles exhibit some of the characteristics described by Glidewell and Hargrove, they are not, inherently, impossible jobs. Despite that, it was apparent that many SROs felt that although it was possible to complete a project, while doing so it was impossible to satisfy all of their account holders.

3.2 A complex governance environment

Being an SRO is just one of many tasks undertaken by senior officials in a department. It brings its own governance challenges into an environment already perceived by many to be complex and sometimes confusing. Many expressed frustrations with both the convoluted governance structures within departments and across government, and in their other relationships that operate outside those more formal structures. This extended governance is not only complex but is often felt to be blurred and ambiguous. On the other hand, they recognise a major aspect of their role is to provide their project directors with the clarity that is often unavailable to them as SRO.

Departments have multifaceted governance structures

Although governance and accountability were terms frequently used interchangeably, the usual sense of governance was that of the formal hierarchical structures in place through which resources and finance were channelled to the project. They described managerial complexity as endemic in their environment.

> *This department does seem to specialise in complexity and complication on top of complexity.* [#35]

> *I'm not complaining about what I have got on my lot, just observing that being an SRO here and having any accountability in government is a curiously complicated thing.* [#36]

SROs work within governance structures that vary between departments and which vary in their perceived clarity. They frequently identified their roles as caught within a complex web of governance structures.

> *Quite a number of the things we do in government are fairly complex, but on top of that organisation we then layer, layer upon layer of further complication and the two things just don't go. You know it makes life difficult squared frankly.* [#37]

> *We have a curious governance structure which wends its way through the departmental hierarchy, and its governance and assurance processes, and the political ones on top of this.* [#38]

> *If you look at the governance process here, I'm not even sure you could write it down, you'd have to do some kind of a mind map. Depending upon the volume of spending you're looking to make, there are eight layers of governance you have to traverse to get to a decision.* [#39]

The governance processes within departments were felt to be complex but those between departments, and between departments and the Treasury or Cabinet Office were singled out for particular criticism.

All the different parts of government require different paper submissions, so they're not coherent or level in terms of requirements and they're all sitting in different boxes here and it would be really helpful if they could get their act together and have one submission and then the governance model can apply to all. [#40]

We've got lots of governance within different parts of the department at corporate level and also within our technology directorate, so there are lots of other kinds of mechanisms in place which you have to jump through and hurdles to get stuff signed off before you can actually go ahead and deliver stuff. [#41]

That's the culture of the organisation, the frustrations that very, very, capable people have in simply getting through that ridiculous level of governance. It excites nobody. The idea of spending your entire week crafting a document that you did last week for board A, but this time for B, but just subtly different, it turns nobody on. [#42]

Most accepted that governance was likely to be complex given the nature of government departments, but it was often perceived to be unnecessarily cumbersome for the pace of the project environment. Whilst departmental or financial governance processes were not specifically created for their projects, they were part of the environment within which they had to work. Their point in describing it so vehemently was that project accountability was another layer which was being added onto an already complex environment.

I fully recognise that pretty much any project more complicated than getting up and opening the door, is going to require a matrix environment, in which you pull various things, you push, encourage, and cajole, etcetera, and you develop the community of interest around it. However, in this department structurally it makes it very hard… extremely hard. The verticals are often dis-incentivised to deliver to the horizontals in the organisation, they simply don't see it as being their thing. [#43]

Governance has to be more clear and I think it needs to be flatter and I think authority levels need to be developed and more trust needs to be passed to people who

> *are making these decisions, as there are too many layers and they take too long to get*
>
> *through, and there are so many of them.* [#44]

Despite the complexity there were a few who did not see it as difficult to manage, and felt reassured by the structures in place. One contrasting opinion came from a permanent secretary who didn't feel there was any problem dealing with the structures in place.

> *We've got very clear governance structures, so we've got a programme board which is*
>
> *supported by a number of other boards for particular aspects of the programme, and*
>
> *that board in itself reports into the portfolio board, and that board then feeds into the*
>
> *management board and that feeds into the ministerial discussions on progress of all*
>
> *aspects of the portfolio. We also feed into the GMPP portfolio reporting cycle.* [#45]

This difference in perception was commented on by SROs and forms part of their evaluation of the permanent secretary as a forum in chapter 5. Generally, adding their project accountability complexity to the existing departmental governance structures, particularly if financial approvals were required, the SROs perception was that the environment was a difficult one to operate within.

> *I think if you didn't have to worry about all these accountabilities, perhaps there is*
>
> *something you could do about streamlining all of this stuff that would actually allow*
>
> *you to get on with delivery, because it should be more about delivery and actually*
>
> *sometimes you can spend the whole week feeding the beast.* [#46]

There was one relationship where the SROs had few doubts about the expectations of their role. The IPA guidance on the role of the SRO makes it clear that 'the project director (PD) is accountable to the senior responsible owner for the day to day management of the project' (IPA 2019b, 6). An almost universal comment from the SROs, and from the project directors I met, was that the SRO provided *top cover* for the project director.[41] They managed

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[41] Top cover is a military metaphor representing aircraft overhead providing protection for troops or aircraft operating below. It was less graphic than many used in the interviews.

the complexity of the external accountability relationships so that the project director could concentrate on managing the project   This was often described using a range of vivid metaphors.

> *In my previous roles I've been in, prior to this, I was a programme director and the role does feel different when you're a programme director, because you've always got the shit shield via the SRO, the umbrella, there's always a shadow you can step into to get the top cover, and the role of a good SRO gives the PD the top cover, the safe space, and the confidence, so it does feel much more exposed as SRO, although it doesn't necessarily come with any more money.* [#47]

> *One of the things one of my team said early on is that we want you as a shit umbrella. What you do is stop all the crap from everyone who wants a piece of us, so that we can get on with it. And someone else said, you have to think as a shock absorber. If you don't have a shock absorber like the SRO everything hits you like a terrible ECG, not actually smoothing things out, so you need to be the spring in between them and the project so it doesn't make it worse.* [#48]

Acting as a metaphorical umbrella or shock absorber, the SRO role is perceived to be about catching the demands of the multiple forums and converting them into a clearer set of requirements to the project director. As a project director explained:

> *What gets done is what the SRO wants. It's up to him to give me the direction and interpret all the stuff from across the shop and beyond. That's why he is the one who has to go to the management board or the PAC and explain things. I may well go with him, but I will only have been doing what he asked me to do.* [#49]

Blurred accountability is a challenge

The civil service is often perceived to be the classic hierarchical bureaucracy. Financial and managerial delegations are made within formal structures, in departments and across wider government. Officials commented on the bureaucratic and hierarchical structure they perceived elsewhere within their departments.

> *The other challenge is that for everyone else, the civil service is a very hierarchical*
>
> *organisation.* [#50]

They make it clear that their experience of project accountability is not based on simple

principal-agent relationships. The clear lines of formal authority displayed in organisational

charts were invariably used to contrast the pictorial demonstration of clear hierarchy with their

verbal explanation of reporting lines in practice. Their explanations matched the descriptions by

Page and Jenkins (2005, 12) of the problems when interpreting how things are done within

departments, compared to the charts which purport to illustrate the organisation. Their

relationships were rarely operating through visible hierarchical structures. It might be expected

within ostensibly hierarchical organisations that accountability would also be seen to function

along established principal-agent lines of control. The emphasis in the SROs' accounts was

about the specific lack of an obvious and overriding hierarchy in their accountability, other than

with permanent secretaries.

> *It's not a hierarchy, it's a series of unrelated linkages any one of which could make life*
>
> *very difficult.* [#51]

The departmental hierarchy still has an impact on the SRO, and the importance of some key

relationships, such as those with permanent secretaries and departmental boards, are described

chapter 5.

When contrasting what they experienced compared to the hierarchy that might have

been anticipated, the multiple mechanisms were described as a matrix or being 'blurred'. This

confusion was felt in two ways. Not only did SROs find themselves held accountable by a

number of forums but in some cases these forums appeared to hold a number of different

individuals accountable for the same specific aspect of a project.

> *I'm facing into a blur of claimants. I was extremely clear that I was accountable to at*
>
> *least two or three different people, but they overlapped, and it was extremely clear that*
>
> *there were at least two people who were definitely accountable for the same thing.* [#52]
>
> > *Where it becomes blurred and where you have to manage relationships, is*
> >
> > *where I effectively outsource bits of my projects and programmes to one of my peers*

> *inside of this department and there is a dual accountability as we both have to account*
>
> *to the permanent secretary for the delivery of the same things in the end.* [#53]
>
> *It's basically an accountability matrix within the Department.* [#54]

SROs not only face a matrix of relationships, but for some it was not clear where the distinction lies between themselves and their SRO colleagues.

> *Within the department there is no one person responsible for bringing in that public*
>
> *benefit in a particular aspect of the overall project, so I'm an SRO for one aspect, and*
>
> *there is another SRO for another part of the infrastructure, and yet another SRO for the*
>
> *organisations planning to be operating the systems. So it's very hard, I think, for*
>
> *ministers to point to one person and say you are responsible, or you are accountable,*
>
> *because the accountability is splintered through at least three SROs if not more in some*
>
> *cases.* [#55]

Even those who didn't consider their accountability environment to be blurred still had problems defining what exactly they felt they were accountable for.

> *The accountability wasn't blurred in the sense it was clear, but it was conflicting I*
>
> *would say. So I don't think it was so much blurred but that I'm not quite sure what I'm*
>
> *accountable for or to who. That was problematic.* [#56]

The experience of officials is at odds with the concept of simple hierarchical structures. It was a difference which mattered to them, and they were keen to establish that their role overseeing or running projects felt different from their other roles in the civil service. They felt that the simple hierarchical perspective ignores the complexity and confusion that exists within their actual working environment. This accords with Romzek and Dubnick's (1987, 228) conception that 'public administration accountability' is better understood in terms of how officials manage the multitude of 'diverse expectations generated within and outside the organization.'

The increase in the number of accountability relationships over time was frequently described, with many of these activities having little obvious relevance to project outcomes. Listening to the descriptions of the gradual addition of minor and often conflicting mechanisms

to the SROs routine, which they accept as part of their role, there is a sense that this is the 'normalisation of deviance' (Vaughan 1996, 410). The intensifying scrutiny, and accumulation of mechanisms of all sorts from many directions, has created an almost unmanageable accountability burden, identified in their description of 'just coping'. This normalisation of excessive numbers of minor mechanisms becomes apparent when asking SROs to list their relevant forums. It was a surprise for some when they were able to compile an extensive list quite easily to explain their position. SROs are coping with an accretion of relationships which blur into each other. The way in which some have used their new parliamentary accountability to manage this burden is discussed in chapter 7.

Projects are a dynamic environment

GMPP project leadership is about managing transformation in an environment that is constantly changing. Officials stressed the dynamic and flexible nature of their interaction with stakeholders, many of whom were account-holding forums. The impact of changing stakeholder priorities, due to changes in forum personnel or expectations, is perceived as a major influence on the accountability environment.

> *My experience, here is that accountability is continually evolving in its complexity and always moving away from simplicity to more confusion. It's always changing.* [#57]
>
> *This is probably the most dynamic environment I've ever had to work in.* [#58]

Frequent changes of personnel or priorities within forums make the management of relationships more difficult. Political change, either new ministers or changes in their ministers' priorities, were seen to have a particular effect on the project environment and influenced the ability to achieve project outcomes. The short tenure of ministers is highlighted in a report by the Institute for Government (Sasse et al. 2020, 4) which notes that since 2015, Secretaries of State have averaged 18 months in post and the average tenure of junior ministers is less than that. The same report notes that 'frequent turnover also makes it difficult for Parliament to hold ministers to account for their actions – particularly when a policy is designed badly and runs

into implementation problems' (p. 10). The comments from the SROs support this analysis. Ministerial changes were frequently raised as a problem.

> *It's knowing when things are going well, and then how it's going wrong and how you can fix them and get them right, and can you see things which you didn't know were going to happen, and how flexible you can be as a project leader to deal with changing circumstances, which as you know, in the political context, with ministers changing or budgets being cut unexpectedly, or somebody changing your remit halfway through the project, these are major occurrences.* [#59]

> *Ministers change their mind, but they have a real responsibility around keeping a steady hand on the tiller, and I think a Secretary of State who flip-flops in their approach has as much blood on their hands as a poor SRO.* [#60]

> *Ministers often change their minds based on someone else they have just spoken to.* [#61]

> *You work within the bounds set by ministers and so the ministers decided 'the policy we meant was this' and so we had to change the whole direction of the programme. It's actually a reinterpretation of what their predecessor wanted, but done so the new minister can launch it as a new thing.* [#62]

> *There have been significant changes because of the new Secretary of State, and the new White Paper, and it changes the portfolio within which the programme is sitting. It has changed quite considerably, and so there is a lack of clarity in terms of filling in that SRO letter as to what exactly the contribution of this project is to that broad portfolio that we are being held to account for.* [#63]

Ministers were not the only forums to change their expectations, although they were felt to be the most salient forum that had a potential for significant change at short notice. Civil service turnover also creates problems. The Institute for Government reports that current SCS turnover, defined as those staff moving posts rather than leaving the civil service, is consistently above 15% in some departments and in seven it exceeded 30% annually. Similarly, the average

tenure of permanent secretaries is around three years (Sasse and Norris 2019, 9-11). These changes in SCS posts have an impact on institutional memory and capability, and for projects that have long development and implementation phases the forums that SROs interact with are likely to have substantial changes in their management on a frequent basis. These ministerial and senior staff changes have an impact on the capability of units within a department to understand and manage their relationships with projects and act as coherent forums. It was described as a serious problem by SROs. Throughout the discussions it was made clear that forums could rarely be regarded as having fixed views and that within the political and administrative environment of departmental projects this was to be expected. Dealing with dynamic forum expectations is a necessary part of the job and makes understanding the forums particularly important for the SRO, who must continually, if intuitively, assess their perspective on the project. This assessment of changing expectations is covered further in chapter 4.

3.3 How it feels: Scrutiny, blame, and reputation

Some characteristics of the experience of being an SRO appeared frequently during the discussions. The three that were most often mentioned were scrutiny, blame, and reputation. They were expressed as a reflection on how being accountable made SROs feel, rather than about the legitimacy and activity of particular mechanisms, forums, and relationships. It was often the adverse nature of the three characteristics that formed the frame within which they described their roles. For those who were not full time SROs, they contrasted their SRO activity with that in their full time position. Some recognised that the strength of these characteristics led them to adopt particular behaviours, which could be defensive in nature and consequently not necessarily beneficial to their approach to project management or their account-giving behaviour. However, overall the sense was that these characteristics were not alien to the senior civil servant, but were felt as substantial amplifications of their experiences elsewhere.

<u>Scrutiny is heavy but necessary</u>

All leadership in the public sector comes with scrutiny. A permanent secretary may occasionally be in the public eye, or subject to scrutiny in Parliament. This is less likely for senior departmental figures such as DG and director roles covering policy or operational activities. Comparing themselves to their senior colleagues, the officials running major projects reported intense scrutiny from a wide variety of stakeholders. This was not just related to an accountability relationship, as many stakeholders were regarded as unable to hold the official to account. This sense of oversight, but not necessarily accountability, was evident in the interviews and SROs distinguish between general scrutiny and being accountable. Programme and project management is a new profession and many project leaders have had other policy or operational leadership roles within government. Comparing these two environments, these project roles are felt to have more intense scrutiny than other leadership positions. Similarly, they perceive projects on the GMPP list to involve higher levels of scrutiny than projects that are not on the list.

> *I felt subject to an enormous amount of scrutiny, far more than I'd ever experienced in any operational job.* [#64]

> *I have definitely worked on non-GMPP projects and programmes where there has been less scrutiny and where you feel more empowered to do things and get on and do it the way that you see fit, rather than having to justify, to lots of other people, what should be done in a certain way.* [#65]

They also recognise that this level of scrutiny, and the accountability that accompanies it, is to be expected. They felt it was typical of public sector roles compared with similar but less scrutinised posts in the private sector. Although this may not actually reflect reality, as major private projects are also subject to intense scrutiny, it is not often in public.

> *It is quite a tricky thing when you're being challenged really hard by MPs, and that's something that is probably different as a public servant versus what would be happening in the private sector doing a big major change. Your major project would*

still have boards and stakeholders to be accountable to, but you wouldn't have that public display dimension. [#66]

> *The director of estates at that department constantly struggles with the concept of the bureaucracy of assurance and approval from a government perspective. I guess he was used to negotiating large estates contracts, procuring estate, moving from one estate to another etcetera but is not used to the level of the scrutiny that the department's estate programme will get from the public accounts committee.* [#67]

Whilst not objecting to the scrutiny that comes with major public roles, they did express some concern that it opened them up to more reputational concerns and blame than their non GMPP colleagues.

Being blamed is a concern

Accountability mechanisms have been described as 'firmly anchored to individual concepts of credit and blame' (Anderson 2009, 327). Blame risk (Hood 2011, 5) is certainly recognised as a potential factor by SROs.

> *You have this strange bilateral relationship within the civil service where ministers and civil servants can't really quite decide who is to blame for anything, so there are multiple opportunities for finger-pointing, whether it's a rubbish policy or it was implemented badly, so there's nobody ultimately held accountable for anything.* [#68]

> *My experience of accountability, at this department, is that it is constantly evolving, and constantly involving the complications of our organisational structure, how we do governance, how we apportion responsibility and blame.* [#69]

This apportioning can be expressed in the most public manner. A Secretary of State stating his views following an NAO review was reported by The Guardian in a headline: 'Iain Duncan Smith blames civil servants for IT failings (Watt, Syal, and Malik 2013).' The prospect of being blamed by politicians when they come under pressure was mentioned by several officials.

> *The problem is, we should be accountable for what we do, but we can easily be sacrificed by elected politicians.* [#70]

The sense of blame as a routine constituent of their public accountability is evident.

> *There is a risk that ultimately all of those groups signing stuff off... the various different hurdles we have to go through in terms of Cabinet Office controls, and also things like our technology design authority, and technology executive team and so on, ultimately they're not accountable for the totality of the delivery. They're kind of reviewing a specific decision point or giving authority for a specific amount of spend, and they're not accountable for that, so if it all turned nasty and you ended up in the press it wouldn't be them who would be dealing with it, it would be me as SRO.* [#71]

> *I think a project manager in government is the most difficult discipline. You absolutely become a lightning rod for blame and that is something you have to be wary of.* [#72]

While there was always some exposure to blame associated with their roles, it was particularly a problem when their project was being examined in public forums such as the PAC or select committees. The likelihood of being blamed for problems varies (Hood 2011, 8) and SROs are acutely aware of the *negativity bias* displayed by many of their forums and within the media relating to their projects. These GMPP roles are different to those created as part of the NPM reforms of the l980s and 1990s where agencies were created that 'involved the idea of transferring risk, blame, and responsibility to quasi-autonomous public managers' (Hood 2011, 123). The senior civil servants in these agencies had delegated authority that often isolated them, or insulated them, from their respective departments and ministers, and vice versa.[42] However, GMPP SROs remain within the management structure of their departments and under the formal direction of their permanent secretary. In the case of autonomous agencies, the blame for failure is potentially transferred as a result of the perceived independence of the managers from the routine operational management of the department and their ministers. Projects belong to departments and frequently have budgets substantially larger than some

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[42] As the CEO of a Next Steps Agency in the early 2000s I had personal experience of this delegation.

autonomous agencies. The SRO is still working within the direction and control of the department. As a result of the change introduced by the revised Osmotherly Rules, they recognise these roles have the potential to be seen as a strategy by ministers or other senior officials in the department, to avoid blame, framed as their failure to manage a project.

> *Ministers know this is a refreshingly rare area where they genuinely can blame officials if things go wrong, therefore they often take considerable care to stay away from it, and from interfering or setting directions, and they let you get on with it.* [#73]

This reflects their perception that for some, part of the accountability narrative is about having someone to blame within projects, which will always be difficult and can carry reputational risk for ministers. They described this operating within departments, and across Whitehall generally, with Parliament and with a multiplicity of regulatory and governance institutions acting as account holding forums that could expose them to this risk.

> *People in the centre of government, like the Cabinet Office, are saying I want you to do it this way, but they are not accountable, so you have people with power without responsibility,… but you're the one who is going to carry the can if the whole thing collapses and you won't see these people for dust.* [#74]

> *I know we are accused of optimism bias, and it is frequently the case that we can take on too much or try to do things too quickly in the department. But it can be a challenge as ministers always want stuff done faster and cheaper and are not always interested in us trying to control scope creep. It's not an excuse, but it's easy to blame the project managers when things go wrong. I don't find many ministers or policy staffs putting their hands up and pointing out they asked for too much too quickly.* [#75]

Optimism bias is inherent in major projects within both public and private sector (Flyvbjerg 2013, 325) and the government has published guidance on how to deal with it in public projects (HM Treasury 2013). Despite this the SROs felt that when projects failed through over optimistic targets, or timelines over which they had limited control, it would be the

newly visible project leader who would be the easiest to blame, particularly at a public committee hearing. The complexity of the network of those involved in establishing a project, resourcing it, and then changing it over time, was seen as symptomatic of working within the public sector. The potential confusion that multiple forums can create is anticipated as a deliberate or unavoidable outcome. In this context, accountability as a form of blame management is perceived to be an expected part of working at the strategic apex of a public department.

Reputation is important

Reputation management for both account holders and account-givers can affect the nature of the resulting relationship. This sense of reputational concerns being part of the assessment of a forum, and the corresponding accountability relationship, is supported by comments from participants. Busuioc and Lodge (2017, 92) describe reputation as a 'filtering mechanism for external demands'. One official described attendance at their programme board meetings as daunting '*because you're accounting for your reputation in what you're doing.*' [#76] The SRO's perception of the link between personal reputation and the accountability environment was mentioned in many conversations.

> *I worry about my reputation because you're personally accountable in a way that most of your colleagues are not when things go wrong and, as in the way they usually do, you definitely feel exposed in a way that I didn't in previous policy roles.* [#77]

The importance of reputation management was particularly evident when they described the Osmotherly changes, and their consequent exposure to parliamentary committee hearings. This is covered in chapter 7.

Project management is a new profession within the civil service career structure and many of the ministers and senior civil servants holding an SRO to account have little understanding of how projects are managed. As a result, some SROs perceived a lack of professional respect for their specific role as project leaders, compared to roles in the operational or the policy community, which are more understood. For those with more

experience in delivery, having a track record strengthens the perceived professionalism associated with both the project and its managers. Others felt that account-holding forums failed to appreciate that they are engaged in complex work and exercise considerable professional expertise in the execution of these roles. This leads to a sense that their performance in these roles will inevitably be underestimated.

> *I've seen people's reputations get dragged through the mud very publicly, so I've heard Richard Bacon who I think still sits at the PAC, ask for a copy of the accountable officers CV, and the SROs CV, ... and seen headlines the next day saying 'you wouldn't trust this man to sell candy floss on the front at Blackpool.* [#78] 43

> *We are so short of people who do this, and what we are doing now to get a sense that this is a profession, and bringing a bit of order to it, is giving people a bit of sense of esprit de corps. But there is this feeling that you are still 'slightly trade'.* [#79]

It was evident from the interviews that in these significant roles they feel they have a reputation within the department and the project community. Their performance when called to account can have a major impact upon that reputation. Although often described adversely, some mentioned positive aspects, such as reputation being enhanced by success in the role, or when seen to solve significant problems, and a good performance at a select committee. The importance of personal reputation as a factor in the SROs experience of being held accountable is explored further in chapter 7, as it is a significant aspect of the SROs perception of the relationship with select committees. Personal reputation is not the only factor here, and SROs described the importance of the reputation of their account holders when assessing their salience.

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43 The official was SRO for an NHS programme and was being 'subjected to prolonged, derisive, destructive scrutiny' by 'three wolfhounds' according to a newspaper article entitled *Not sure he was up to running a Morecambe candy floss stall.* See Letts (2013).

3.4 Feeling accountable is appropriate and positive

The final two general themes address the legitimacy of being accountable and the SROs' positive approach to their roles and being accountable. It was interesting to note that they felt their public accountability was not only relevant but in many cases enjoyable. Alongside positive aspects of reputation, many felt there was even a positive side to the level of scrutiny they experienced. It was clear from all the conversations that SROs, given oversight of these huge ventures, expect to be accountable. Despite the challenge of getting alignment from the stakeholders, and the dynamic nature of the environment, they never doubted the need to be able to justify what they were doing to many of those institutions. They frequently felt that a particular account holding activity was misguided or ineffective, but the importance of being accountable for the project, and the public good it was creating, was a significant factor in the way they felt about their role. Furthermore, almost all of the civil servants I interviewed talked enthusiastically and positively about their roles.

Accountability is appropriate and important

Being accountable, in general, was always described as legitimate, even if the exact nature of that accountability, in terms of for what, to who, and against what criteria, were described less definitively. It was not only perceived to be legitimate but was also regarded as an important part of being in the civil service. SROs distinguish between the overall legitimacy of being accountable and the specific legitimacy of particular forums to hold them to account. They draw a distinction between those relationships which they regard as being with a legitimate account holder and others regarded as less legitimate, and that is covered in chapter 4. However, there was unanimity amongst the officials that in these roles they must be held accountable, despite the way that was exercised in practice being the source of some frustration.

> *You'd absolutely expect the guy, who you don't know the name of but who does stuff*
>
> *with a government project, to make sure they're doing a bloody good job to get best*
>
> *price, best value, in the right way, because it's what we as taxpayers deserve from our*
>
> *government, so you may not know their names or where they live, but you absolutely*

expect that accountability in the same way that the chief executive of a local hospital

has, or partners in your local GP practice, you know, you hold them to account. [#80]

When describing the importance of being accountable, officials were drawn into discussion of the legitimacy of the policies behind their project. Whilst being comfortable with the organisational legitimacy of their projects, some were running projects which they described having low levels of approval from sections of the public or industry. Being appointed as the SRO for a project with a chequered performance history, public dissatisfaction, or past failure, brings with it a lot of scrutiny from a wide variety of potential forums. Projects such as Universal Credit, Smart Meters, NHS IT, or various Home Office projects during this period, might all be considered to fall into this description.[44] A project in difficulty could leave the official vulnerable to increased stakeholder interest and conflict.   This could lead to changes in ministerial attitudes, further complicating the role of the official and the scrutiny applied to them.   If a project is felt to be failing by either the public or key commentators this can result in ministerial wavering and increasing scrutiny. There were several comments made about the likelihood of their project being exposed on the *BBC morning interview* where their minister would get questioned about difficulties that had become public, and which would result in intense scrutiny, both before and after the minister's interview. [45]

> *With things like the SRO letter, and appearing at the PAC, we're seeing a blurring of*
>
> *these lines, a little bit. I think there was an undercurrent, certainly in the last*
>
> *government, the coalition government, of ministers breaking that bond with civil*
>
> *servants in terms of its impartiality and not always taking responsibility when things go*
>
> *wrong ... kind of pushing it onto the civil service when they got called up at the BBC. I*
>
> *didn't feel that me being accountable was legitimate then.* [#81]

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[44] SROs for some of these projects were regularly called to PAC hearings.

[45] The BBC Radio 4 *Today* programme included a regular political interview that 'strikes terror into politicians' hearts' (https://www.theguardian.com/media/2018/jul/01/is-today-programme-losing-its-grip). It was described as an *accountability interview* by one of the BBC *Today* programme interviewers in discussion with the author in 2018.

<u>Being in very accountable roles can be rewarding</u>

It might be concluded from the narratives here that the SROs' opinions of their accountable roles were predominantly negative, but I found that almost all of them described the jobs as extremely rewarding. Being accountable was felt by many to be one aspect of this.

> *People ask me how I feel sometimes, and I tell them I feel if you're coming into work why not be involved in the big things that are going on in this country and these projects are definitely that. I come to work because I need to know I will be involved in really interesting and dynamic things. It's really difficult but I do enjoy it.* [#82]

> *I really enjoy being accountable. I think in these situations one should be accountable and you have an opportunity to choose how much you want to take on, and that goes hand-in-hand with risk and reward. Even if it goes wrong and you're accountable, if you've done a great job, you know you kind of expect to stay in post or to take on another role. But the job satisfaction when things are going well is great and these are great things you can talk to friends and colleagues about.* [#83]

Many ministers and senior officials were described as supportive and understanding and recognised for their effectiveness in steering major projects through difficult periods within government (albeit not often).   What was most apparent was the sense of community that SROs felt amongst their colleagues in similar roles and within their MPLA cohort. This is considered further in chapter 5. I specifically asked each SRO if they enjoyed the role. Few answered immediately and some gave cautious answers, but two comments sum up the overall response.

> *I think one of the reasons why I quite like being an SRO in this programme is that I quite like having a degree of responsibility and trust. Having the confidence of ministers and my senior civil service peers, my overlords, about my ability to get on and do the right thing, so there is something about this being where you know you have to be accountable. Sometimes being accountable is fine, and I like it, but when you're accountable to six different forums it's just a bit crazy, sometimes you ask do they add six times the value. Perhaps not, but these are great jobs.* [#84]

> *And it's not all bad. It can be tough, but you're not accountable to some unknown manager in a big corporation. I will be able to show my children this thing we are creating and say I did that, and I was accountable to the government and to Parliament for doing it. There's not many will ever get the chance to have the kind of impact we are having here.* [#85]

Conclusion

When describing how it felt to be accountable for a major project there were some general themes that arose from the interviews. Their experience of specific relationships and how they were managed, and the impact of the Osmotherly changes, are covered in the next four chapters. In the general themes covered here, they describe complex roles, not just because of the scale of the projects but because of the nature of the stakeholder network and their competing expectations. It may not be surprising that the governance structures they work within are complex, or that there is substantial scrutiny of their performance. That a concern for their reputation and a worry about blame are features of their life as an SRO are equally unsurprising.

It is not easy for SROs to establish exactly what their accountability means, in the terms described with the Boven's model, of for what, to whom, and how. This reveals some of the complications inherent within the concept of accountability described in chapter 1. It is an easy thing to demand but less easy to define and it is notable that even officials whose job descriptions explicitly mention their accountability found it difficult to be specific about what exactly that meant. Despite this problem they recognise that in this complex and demanding environment it is entirely legitimate that they are held to account and they enjoyed being in these significant and accountable positions. The challenge is for them to establish the 'for what, by whom, and how' for each of their major stakeholders, and this is explored over the next two chapters.

Chapter 4. Evaluating Forums

'In short, whoever you may be,

To this conclusion you'll agree—-

When everyone is somebodee,

Then no one's anybody!'

Don Alhambra in Gilbert and Sullivan's 'The Gondoliers'. [46]

Throughout the interviews it was apparent that SROs face a large, almost bewildering number of individuals and organisations who consider themselves stakeholders in the project. This chapter lists twenty different types of account holding entities that were identified by the SROs. These twenty forums possess a variety of attributes and are not considered to be equally important or effective as account holders. SROs make decisions about how to manage their forums based on an assessment of their characteristics or attributes. I suggest that they decide which are the most salient account holding forums based upon a combination of attributes. The three groups of attributes represent the forum's authority, its interest in the project, and the likelihood of demanding an account.

The epigraph at the head of this chapter was introduced in an interview by an SRO who quoted from Gilbert and Sullivan's comic opera, the Gondoliers (Gilbert 1912, 209), to describe the predicament of assessing which of the very important account holding bodies they faced at

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[46] In Gilbert and Sullivan's opera The Gondoliers, the character Don Alhambra del Bolero, discovers that the Republican gondoliers have promoted everyone in their domain to high rank and is concerned that there must instead be a distinction between commoners and nobility.

that moment was the most important. When facing multiple forums with competing

requirements, officials need to manage the range of demands on their project and on their time.

Deciding which ones are salient requires expertise, judgement, and experience. Decisions have

to be made about which ones can be ignored, avoided, listened to, or given an account.

> *It's like the song 'when everyone is somebodee, then no one's anybody'. If you can't tell*
>
> *them apart then all the forums are just a mass of demanding individuals. I have to*
>
> *decide which ones are the aristocracy and which ones are the merchants and which are*
>
> *the peasants. I can then treat them accordingly.* [#86]

If all the forums were equal in the eyes of the SRO then none would have priority. But

forums are not all equal and the SRO must choose between them. The need for empirical

investigation into how prioritisation works in practice was identified by Hall et al. (2015, p.

209). From the discussions with SROs I suggest they prioritise by first assessing the salience of

forums and they then determine their response accordingly. This chapter describes that

assessment, and then chapter 5 will describe how they categorise their principal forums. They

had a variety of ways of describing forums, and first I use these descriptions to identify the

attributes that were employed to determine the importance and effectiveness of the forums.

These attributes fall into three groups: authority, interest, and likelihood. Next I show how a

combination of the attributes can be used to create a typology for forum salience, and identify

some of the different categories. There was substantial consensus amongst project officials

about these attributes and the forum categorisation. I propose an adaptation of the modelling of

stakeholder salience proposed by Mitchell, Agle, and Wood (1997) to display this

categorisation. Finally, I address the relevance of a forum's ability to apply sanctions against

the SRO, as this affects the perception of their importance.

4.1 Identifying attributes

Some individuals and organisations are recognised as being more capable than others of holding

an SRO to account. They usually need a more active or immediate response to their demands.

> *It's interesting isn't it, where does accountability actually land, I've got lots of*
>
> *stakeholders, but am I accountable to them?* [#87]

To prioritise their accountability relationships, the SROs assess the characteristics or attributes of the forum and use them to determine how to respond. The method of this assessment ranges from a formal structured process to a brief intuitive review.

> *You have to look at this multiple accountability problem. How can anyone hold an SRO*
>
> *accountable for a programme when you can argue about this accountability over here,*
>
> *and this budget reduction over here, and some other impact over there, so anyone faced*
>
> *with all of this can say I can't really be accountable when you've all made so many*
>
> *changes. So how do you decide who to listen to? If you can't choose between them*
>
> *about how to affect different things how can you really be held accountable?* [#88]

When asked to whom they were accountable most officials identified several forums immediately and within a short period could identify many more.[47] The forums acknowledged by the SROs are shown at figure 4.1. Each individual SRO identified between five and twelve types of forum, with a median of eight.

The categories in figure 4.1 represent types of forum rather than specific individuals. For example, the 'Departmental DGs' category combines a number of individuals, as an SRO may feel accountable to one or more DGs, to a Chief Financial Officer, Chief Technology Officer, Chief Information Officer, or other departmental figures at that level. Similarly, some SROs identified separate ministers and their Secretary of State as accountability relationships, but these are combined in the figure as one type of forum. There were a few SROs who undertook a formal process of stakeholder analysis that included within it a form of account-holder evaluation. Most were less structured in their analysis but described the forums and their behaviour in ways that displayed an intuitive approach to this categorisation. Their process of establishing the relevant forums encapsulates a search for *which forums really matter and in what way will they hold me to account*. From the descriptions it was possible to draw out the

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[47] The footnote on page 87 gave an example of one list with multiple forums.

themes representing the key attributes used by SROs to assess their importance or salience. The more salient a forum, the more the official needs to be prepared to respond to it, or to manage its demands. More salient forums have more impact on the SRO's time and require more attention and therefore more resources to support their demands. To describe the characteristic attributes of the most salient forums I have adopted a similar approach to that of Mitchell et.al. (1997, 854), who proposed key attributes which addressed the salience of stakeholders in commercial ventures.

Figure 4.1 Number of SROs identifying specific forums holding them accountable

SROs identifying the forum type

Forum Type	SROs
IPA/Cabinet Office	44
Permanent Secretary	44
Programme Board	43
Select Committee (Parliament)	41
NAO	37
Departmental DGs	32
Ministers & Secretary of State	27
Treasury	25
Departmental Committees	20
Outside Department (Whitehall)	17
Internal Assurance	15
Users/customers/taxpayers	14
The PM "Profession" - Peers	13
Industry Bodies	10
Other SROs	10
Project Team	10
Self - Emotional	8
External Commentators	8
No. 10	5
Devolved Assemblies	4

Source: Data from interviews with 47 SROs in 2016-19

From the interviews a parsimonious interpretation identified six attributes, which I have drawn together in three groups: authority, interest, and likelihood. Like Mitchell's stakeholder proposition (1997, 873-878), I suggest that forum salience is positively related to the mix of attributes perceived by the SRO to be present. The groups of attributes are shown at table 4.1. The first grouping is the *authority* that a forum holds over the official and the project. Authority here is a combination of the power the forum has to call the official to account, and the legitimacy the official accords to that forum.   The second grouping, *interest*, combines the focus within the forum, relating to which aspect of project activity is relevant, with the forum's internal expertise that is applied when holding the official to account. The last group is *likelihood* and combines the SRO's expectation that they would actually have to account for their decisions to this forum at some time, with the immediacy expected of their response. This distinguishes between routine arrangements and short notice, but often high profile, urgent demands.

Table 4.1 Grouping of the forum attributes described within SRO interviews

Grouping	Attribute
Authority	Power
	Legitimacy
Interest	Focus
	Expertise
Likelihood	Expectation
	Immediacy

Source: Attributes drawn from description of
forums in interviews with 47 SROs.

Forum Attributes: Authority, power, and legitimacy

Officials recognise that their accountability relationships are about the exercise of power. Their explanations about the power of a forum exposed the complexity of that concept and the

conflation of power, authority, and legitimacy in their conversations (Uphoff 1989, 295). The concept was frequently raised in discussion.

> *Central government controls are a slightly mysterious thing, because do they have any actual status? It's not entirely clear. They possibly do, because the Cabinet office has power, but only because it's been delegated by the Treasury, but the Treasury do have these powers of control, but if the way those powers are exercised was to cause major problems in the execution of something that's been in the accountability of the AO and SRO, and the AO and SRO refuse to accept them, it is not entirely clear what they would do, would you end up having to get the Treasury to instruct your ministers to give your AO direction? Maybe that's ultimately what would happen, but as you can imagine, my permanent secretary was not interested in engaging in this discussion in any way.* [#89]

SROs draw a distinction between power and legitimacy. They distinguish between the power that a forum might have, and the legitimacy they ascribe to it. Their use of the term *authority* as a shorthand for the combination occasionally required investigation during interviews. They are alert to the distinction that Uphoff (1989, 300) draws between 'the claims of persons in positions of asserted authority' and the 'judgments made about the legitimacy of that authority'. The power described was either *remunerative*, based upon material or financial resources, or *normative*, based upon prestige or accepted cultural norms (Etzioni 1975, 5). Legitimacy describes the SRO's perception of the appropriateness of a forum in holding them to account. The description of a forum as *important* or *authoritative* was used frequently for those forums with both power and legitimacy. They distinguished between an institution's perceived authority, its power, and its legitimacy.

> *It's a forum that that couldn't compel me but it's an important public forum and an important and legitimate legal stakeholder.* [#90]

If a forum was felt to have *remunerative* power, and was able to control promotion, salary or bonus, then the accountability relationship was felt to be strong. Ministers and permanent secretaries were described this way. The Treasury controls financial resources, which provides their source of power. Permanent secretaries have a clear mandate for the exercise of their power as the departmental line manager and can use that to call the official to account whenever they require. Officials frequently cited their line manager as a forum that has the power and legitimacy to dictate action or determine decisions, even if that was not the permanent secretary. The programme board also occupied this position.

> *The programme board is the ultimate authority insomuch as even if the Secretary of State said 'I want you to change' I would still go back to the programme board and ask for permission.* [#91]

Power was only felt to exist in the accountability relationship to the extent that a forum can actually exercise that power. Other forums, without such power, needed to obtain some external support to exercise authority. This was seen as a distinguishing feature between forums.   How authority might be obtained, if not already existing in the forum, was also described. Forums can possess power themselves or can attempt to gain access to it through some normative or utilitarian means. Officials described forums outside the management hierarchy exhibiting this approach and thereby positioning themselves as accountability forums. Forums with limited authority, particularly those without perceived legitimacy, may attempt to get a position on a programme board. These included internal audit functions, departmental user groups, and parts of the Cabinet Office.

The second attribute within authority is the 'legitimacy' ascribed to a forum. This is based upon the official's perception of that forum and the reason for its claim for an account. How they exercise or signal their desire for authority can determine how the SRO's perceive their legitimacy. Their assessment accords with the description by Carpenter and Krause (2012, 26) that audience 'behaviors toward government agencies are a function of their beliefs regarding what tasks government agencies can and cannot perform effectively'. The SRO's

perception is based upon previous experience, judgments about the role, the individuals involved, and their reasons for exercising authority. These judgments may be made explicitly, tacitly, or habitually. They do not regard all forums as legitimate and are less willing to invest time or effort into meeting some accountability demands, or will regard some outcomes as less important.

The legitimacy described here is that perceived by the official in relation to the forum in its account-holding behaviour. Officials interpret the legitimacy of a forum based upon its location within the network of institutions with relationships to the project, and their perception of its relevance and suitability to hold their particular activity to account. This organisational legitimacy fits Suchman's (1995, 574) description of 'a generalized perception or assumption that the actions of an entity are desirable, proper, or appropriate within some socially constructed system of norms, values, beliefs, and definitions.' The dimensions of organisational image described by Carpenter (2010, 46); performative, moral, technical, and legal-procedural, provide some insight into the SRO's assessment. In some cases, a forum's reputation in these areas expressed the strength of the legitimacy ascribed to it.

No official doubted the legitimacy of their permanent secretary as an appropriate forum. In contrast, many doubted the legitimacy of parts of the Cabinet Office or other departments to hold them to account. Some SROs felt that the Government Digital Service (GDS), an organisation within the Cabinet Office which issues advice and protocols for government IT, lacked a legitimate mandate to hold them to account. No official questioned its technical legitimacy as an organisation undertaking its role in advising on government IT, but several questioned whether or not it was legitimate in trying to hold them to account, as an SRO, for aspects of IT within their project.

The perceived legitimacy of a forum is not solely related to its hierarchical position and authority, but also its observed relevance within the accountability environment. Suchman (1995, 575) describes the impact of this legitimacy, noting that it: 'affects not only how people act toward organizations, but also how they understand them. Thus, audiences perceive the legitimate organization not only as more worthy, but also as more meaningful, more predictable,

and more trustworthy.' The approach taken by a forum can influence this perception. Some SROs identified the Public Accounts Committee as having authority but having diminished legitimacy because of the behaviour of the membership. This is covered further in chapter 7.

> *If their role is simply to look at the programme and to look at whether or not it was good value for money for the taxpayer, or in terms what the benefits are, then I think they could challenge, but that's not really their role is it. Their role is to get themselves elected and if they can get a political barnstorm then that's their first priority and so what they say they are doing and the reality of what they are doing is different. I think that does to some extent undermine their legitimacy.* [#92]

The combination of power and legitimacy was not always evident in the forum descriptions. Legitimate forums were not always powerful, and some powerful forums were not always felt to be legitimate. When a forum did not possess both attributes it had an impact on how the official felt about that accountability relationship and how they managed it. Where this occurred with some specific forums is described in chapter 5.

Forum Attributes: Interest, focus and expertise

There are two attributes making up the *interest* that a forum brings to its account holding activity. The first is their focus, which is an assessment of *what aspect they are interested in?* Examples included a focus on a specific aspect of the project: financial, operational, particular aspects of IT, or commercial law. This focus might be well known to the SRO, or it could be unknown, or random. The second attribute is the expertise they are able to bring and their ability to question the SRO effectively about the detail of their project.

> *The programme board definitely focuses on where we are with all the milestones.* [#93]

> *The departmental board are focused on both process and outcomes. If it was about signing a contract, they wanted to know if we have followed government procurement processes, whereas the IPA review was very clearly outcome focused, it's about are you going to achieve the strategic objectives from the business case.* [#94]

Focus can be considered as the degree to which the forum has a particular concern for an aspect of the project. This can be broad or narrow and can vary depending upon the phase of the project or in response to specific activity. The SROs described assessing focus carefully. A permanent secretary might have a broad focus whereas operational DGs might be narrowly focused, often on how a programme affects their specific activity. GDS may focus on specific aspects of IT. A minister may focus on particular aspects if they have received media attention. The programme board has a wide domain and will be interested in all aspects of the project.

> *The IPA focus on the things that we are finding troubling, rather than going through the whole project and trying to get the review team to find something.* [#95]

> *I do monthly reports for the Minister, about our performance as he's interested in a specific area rather than just overall, we concentrate on particular elements and we focus the report for him.* [#96]

> *The programme board has various director generals on it and their focus is on delivering, so they are interested in what our delivery challenges are and what plans have we got to deal with those, so I feel accountable to that direction.* [#97]

A concern for the SRO is whether or not a particular forum will look to hold them to account in a way they can anticipate, perhaps in an area of the forum's expertise. If they have no specific focus, they may demand accountability in an unexpected area of the project or the manager's expertise. As Overman (2016, 7) notes, a 'forum can act predictably, regarding its focus, or continuously surprise the actor.' A predictable focus may be related to a forum that is responsible for implementing the procedures, standards, or protocols for which they are holding the official to account. This is possible where a forum has ownership of a standard, such as GDS for IT protocols, or a central treasury function for financial procedures. The strength of focus will be affected by the forum's role in their area of expertise and their ownership of the standards. Schillemans (2016, 1411) notes that 'actors facing an authoritative accountability forum guarding standards it has set itself can be expected to take their accountability obligations

towards their forum more seriously.' For many officials the Treasury fell into this authoritative category.

> *Treasury see all our programme board papers. We treat them as an important stakeholder and have regular meetings with our Treasury contact to make sure they're sighted.* [#98]

> *If you're in the Treasury, it's a small department and there is lots of waterfront to cover, so they tend to focus it on the places or activities where they're most worried about the programme.* [#99]

A challenge for the official is that forums with specific areas of focus may be less interested in the areas of interest of other forums. Some forums had a single-issue focus or concentrated on a particularly narrow operational or business activity. These were not always easy to manage when some form of compromise was required.

> *Each of these organisations and the things that they want, they sometimes have very different emphasis on content, the things that you find their people are particularly interested in.* [#100]

The second attribute within *interest* is *expertise*. This relates to the skills and knowledge they bring to their interrogation of the SRO, and their ability to question the official effectively. This has an impact on the preparation the official must undertake to be able to respond, and the kind of questions they may be asked. An expert forum holding an official to account requires them to be well prepared and capable of responding to probing and effective questioning. Many also felt that this was the most useful relationship to help them with their projects.

> *I think what's missing in the IPA is the portfolio expertise to ask the right questions, like why is a department which is largely doing the same transformation getting different outcomes. Why are they doing things in isolation and where are the real lessons.* [#101]

> *It doesn't feel like being held to account really. You've got to understand all the circumstances, and this is really complicated. I think you would have to beef up the*

> *audit team to get real experts in this area of business so they become very focused and*
>
> *could help.* [#102]

Some forums are recognised for their expertise to question in detail and to investigate thoroughly. Others are less effective, with some being regarded by officials as almost completely incompetent.

> *On that committee there is not a lot of knowledge about what your circumstances are,*
>
> *so there are some good questions and others are just strange.* [#103]

> *You feel a bit like a nuclear scientist being interviewed by GCSE physics*
>
> *candidates sometimes, there's nobody there with the right skills and experience.* [#104]

> *There's a difference between the purely technical competence and situational*
>
> *competence. They lack the awareness of the specific context and situation of the project*
>
> *to be able to help. They need to have that situational and contextual kind of expertise if*
>
> *they're to be effective.* [#105]

> *I think the user groups feel very keenly and very anxious where there are cost*
>
> *increases and delays, but they don't really have any expertise in technology and no real*
>
> *track record delivering any of this stuff themselves, so that is quite a tense and difficult*
>
> *thing on both sides for just that reason.* [#106]

> *I don't question their legitimacy, actually I think it's their competence.* [#107]

Often the organisations regarded most positively were those with the expertise and focus necessary to act as an expert forum. Being held to account was often described as a positive activity, in which case focused and relevant questioning was welcomed. Having an exchange with knowledgeable officials was often experienced as a positive interaction, providing benefit for the project. One might expect the easier relationships to be with less interested forums, lacking the focus and expertise to really 'hold the SRO to account', and unable to pose difficult questions. However, giving an account to an uninformed audience was not felt to be an easy option. A forum making judgements without a full appreciation of the

area of investigation was regarded as more precarious than responsible, and SROs described

making considerable efforts to ensure their account holders understood enough to act capably.

> *I've paid that group, from my own budget, so they can bring in advisers to kick the tyres*
>
> *of my own business case to get them to a position where they are better informed.* [#108]

Forum Attributes: Likelihood, expectation, and immediacy

Whilst an individual may feel accountable all the time, the incidents of being called to account

occur at specific moments. The timing of these events, as Mashaw (2014, 574) notes, are

usually determined by the forum. SROs consider two aspects within the likelihood of being

called to account when they evaluate the forum. The first of these is about periodicity, which I

refer to as *expectation,* and covers the probability that a particular forum will call the official to

account, on either a regular or unscheduled basis. The second is immediacy, which covers the

urgency within the request to render an account. There are many predictable, routine, and

regular accountability mechanisms. These include programme board meetings, weekly

briefings to a permanent secretary, or quarterly audits by the IPA. Here the SRO is working to a

timetable of meetings or reports. There are also unexpected interventions, which might be

related to problems within the project, or its appearance in the media. SROs distinguish

between the routine and the urgent call for an account, and also between forums that might be

expected to call for an account regularly and those that would not.

The programme board and the IPA are expected to call the SRO to account on a regular

basis. A minister may have routine and regular meetings with an SRO but might also demand

an urgent account in the event of some media exposure. When officials get unexpected urgent

requests from unexpected forums, these can feel more difficult to manage. A demand for urgent

answers from less prominent forums is often resisted. A request from a minister's private office

that is usually silent on the project feels more demanding than a regular briefing. SROs

described various calls from unexpected forums that left them feeling concerned about the

approach that may be taken when being interrogated.

> *I told them, if you ask all of the stuff now you'll just create a storm because certain*
>
> *things are not known, and we know they're not known, so we just need to be given time*
>
> *to get to the things, so we can get to know what they are, before you comment.* [#109]

Several compared their experience to the remarks about 'unknown unknowns' made by US

Secretary of Defense, Donald Rumsfeld (U.S. Department of Defense 2002).[48]

When an SRO is called to account by an unusual forum, the urgency and timing inherent in the request can increase the importance of the demand and the perceived salience of the forum. SROs would not normally expect to be called to account by the prime minister or the chancellor, although some have had that experience, and those requests are always regarded as urgent. The departmental IT security organisation was another unexpected forum when project data may have been compromised. This elevated a previously unrecognised or less salient forum to a prominent position. The 'attention-getting capacity of the urgent claim' described by Mitchell, Agle, and Wood (1997, 864), renders the accountability environment particularly dynamic. Like corporate executives responding to stakeholders (p. 867), the SROs describe urgency based upon 'time sensitivity' and 'criticality'. Time sensitivity represents the need to respond to the issue involved rather than the implied authority of the forum, and criticality represents the importance of the claim to the relationship between forum and SRO.

> *The more stakeholders you have in the programme board meeting the longer it takes to*
>
> *align them, and perversely they are usually interested in the most urgent things to them,*
>
> *so that in itself adds a tension.* [#110]

Some linked criticality to the authority and implied legitimacy of the forum. A request from a minister or permanent secretary will be regarded as more critically urgent than one from a forum perceived as less authoritative. Urgent requests can arrive from many directions.

An important aspect of immediacy is the time-lag between the actions of the individual and the point at which they are expected to account for them. The 'when' question can change

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[48] Rumsfeld gave a briefing in February 2002 which included a statement that has since been widely reported: 'as we know, there are known knowns; there are things we know we know. We also know there are known unknowns; that is to say we know there are some things we do not know. But there are also unknown unknowns -- the ones we don't know we don't know.'

how an agent views the 'to whom', 'for what', and the 'how questions' and also their perception of the sanctions that might be possible. An immediate request for an account from the permanent secretary about a problem occurring today is regarded as very different from a request to include it in the monthly meeting expected in a few weeks. Sharma (2007, 304), in a review of the parliamentary scrutiny process, notes that the period between NAO audit and a PAC hearing provides the department with time to prepare its response. An SRO called to a hearing may find themselves being quizzed about something that happened many months before, and for a situation which is now substantially altered. [49]

> *When I was at the PAC they were asking about something that happened about a year ago and I said that was dealt with, we've moved on and they don't seem to know what to say and they can't really point the finger at me as I've put it right since then.* [#111]

On the other hand, sometimes the accountability debate may be about something that has yet to happen and as Mashaw (2014, 575) describes, 'concerning decisions made (or not made) and actions taken (or not taken) today that are anticipated to affect events or situations that will occur sufficiently far in the future that the responsible actors or deciders will not then be able to be called to account'. Accounting for things that might happen, rather than retrospectively explaining things that have happened, was felt to be part of the SROs role. While this may not immediately appear to be accountability, and more falling into the category of an anticipatory briefing, it was experienced by SROs who described being held to account for potential issues within their projects long before they might occur.

> *The minister asked how we knew it would work, as we wouldn't complete things until well after they had gone, and we would probably have moved on too. Who would be accountable if it didn't? They just seemed happy it wouldn't be them.* [#112]

Both these time lags, retrospective and anticipatory, were described as diminishing the salience of any account giving activity.

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[49] Analysis of the NAO report and PAC oral evidence dates for the 2017 parliamentary session shows that the average interval between them is 110 days and varied from 33 days to 309 days.

4.2 Combining attributes: A typology of forums

The attributes of forums and stakeholders have been examined in previous studies.

Schillemans and Overman identified forum *expertise*, *legitimacy*, and the *expectation* that the

official would be held to account, as salient attributes for public officials across seven countries

(2018, 14). Similar attributes have been described as *preferences*, *status*, and *expectation* by

Overman, Schillemans, and Grimmelikhuijsen (2016, 6). Examining stakeholder evaluation,

Mitchell (1997, 855) described the key attributes as *power, legitimacy*, and *immediacy* of their

demands for attention. Table 4.2 compares the attributes from stakeholder theory and

accountability theory with the set of attributes raised by the SROs, and there is an evident

overlap.

Table 4.2 Comparison of attribute groupings for forum salience

GMPP SROs	Stakeholder Theory	Accountability Theory	
	Mitchell et al.	*Schillemans and Overman*	*Overman et al.*
Power	Power	(Parent department)	Status
Legitimacy	Legitimacy	Legitimacy	
Focus			Preference
Expertise		Expertise	
Expectation		Expectation	Expectation
Immediacy	Urgency		

Comparison of attributes drawn from interviews with SROs, stakeholder theory
(Mitchell, Agle, and Wood 1997), and accountability theory (Schillemans and
Overman 2018, Overman, Schillemans, and Grimmelikhuijsen 2016)

SROs give more attention to the relationships with forums possessing multiple

attributes. From the characteristics of stakeholders, Mitchell developed a model of stakeholder

salience, which acts as a useful heuristic for modelling accountability salience. I have adapted

that framework and use the three SRO attribute groups to create a typology of forums to

describe the salience of the different entities. This is shown in figure 4.2. From the SROs

description of the forums and attributes I propose that the salience of a forum is positively

related to the number of attributes perceived to be present. This salience determines how

seriously the officials took account giving activity towards the forum. Like Mitchell's depiction

of stakeholder groups (1997, 874), the descriptive names are alliterative and have no deeper

meaning than to identify the groups. The forums regarded as particularly salient require active

management and have a significant impact on the SROs approach to their project.

Figure 4.2 Proposed forum typology based on one, two, or three attributes
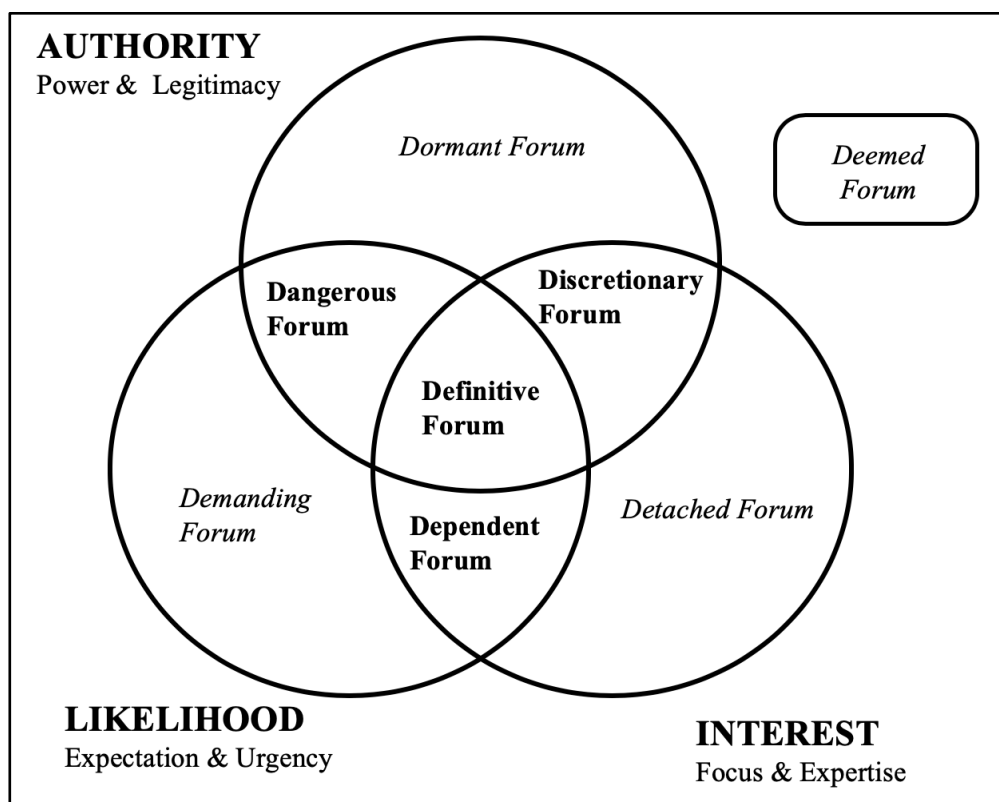
Source: Typology, adaptation based on Mitchell, Agle, and Wood (1997)

The proposed typology model shows eight forum types, with all three attributes, two

attributes, only one attribute, and a final type with none of the described attributes. This last

category is shown on the model as the deemed category, which has no practical means of

holding the SRO to account.[50] Officials consider the attributes intuitively when deciding how to

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[50] Bovens (2007b, 184) describes these entities as virtual forums.

manage a relationship, and none used this actual model. Some had lists of forums, or stakeholders, which they used to consider their relevance, and their subsequent approach to managing them. Within the eight types of forum, most of the SRO's account holding activity is concentrated in those that fall within four categories. These are the ones that have two or three attributes: *dangerous, discretionary*, *dependent* and *definitive*. The less salient categories were not ignored, and in some cases were actively managed to ensure they could be controlled. The *deemed* category had an effect on the way SROs considered their role but was not generally an entity capable of holding them to account. The typology, and the forum types are shown by attribute grouping at Table 4.3. In later interviews, feedback from participants supported this proposed model of salience.

Table 4.3 Proposed forum typology by attribute combinations

Type of Forum	Attributes		
	Power: *Authority & legitimacy*	**Interest:** *Focus & Expertise*	**Likelihood:** *Expectation & Immediacy*
Dormant	✔		
Detached		✔	
Demanding			✔
Discretionary	✔	✔	
Dependent		✔	✔
Dangerous	✔		✔
Definitive	✔	✔	✔
'Deemed'			

Low salience forums: single attributes

Forums with only one attribute are considered to be of low salience. This does not imply that they are not relevant or that an SRO can ignore them. A *dormant* forum is still a powerful one and has to be managed. It just means that its management may be more passive than those forums which are more salient at that time. The dynamic nature of forums means that all of them may need some monitoring, but the more salient take more attention and action. The

official may never hear from some forums in this low salience category. Similarly, entities, which may be potential forums in this group, may never consider calling the SRO to account. But that doesn't mean their existence can be ignored. A *dormant* forum has power but is perceived to have limited interest and is not expected to call the official to account. They are important because of their potential to acquire the other attributes and become significant. When a project is going well there are a number of forums that appear here, such as departmental ministers. When a project is struggling this type of forum can quickly focus on the project and become a *dangerous* forum, and then obtain the relevant capability to become a *definitive* forum. A forum with power will always need to be monitored.

> *As for ministers and Secretary of State, although they have clearly got power and legitimacy, I would actually put them in the dormant forum often. When things go wrong, they get worried, and they want reports occasionally, but they are surprisingly disengaged.* [#113]

The *detached* forum describes those with specific expertise and interest in aspects of the project. They demand explanations or accounts from project officials about their specific interest, but without authority or any immediacy in their claim, they can be fended off. A *detached* forum will need access to authority to have a major impact on the SRO. Some of the forums in this category are encouraged to join the programme board, which is a *definitive* forum.

> *There are others I invite to join the programme board as its easier to keep them fed with information that way than have to deal with them piecemeal. That way I control things rather than have them needing lots of attention for specific questions whenever they feel like it.* [#114]

The principal attribute of the *demanding* forum is their request for attention. They may have urgent requests for accountability, or the official may recognise their regular expected request for an account. Without the authority needed to impose on the SRO, or the expertise to bring specific attention to bear on a matter, they do not need to be actively managed.

Forums with two attributes

Where the official perceives a forum to have attributes in two of the groups, more active management is necessary. The level of involvement moves from the passive approach adopted with one-attribute forums, to active engagement. This may require the continual provision of regular reports, or active preparation to be ready to provide an account should it be called for. The form of engagement will depend upon the attributes, but multi-attribute forums are regarded as important and capable of becoming *definitive*. The *discretionary* forum has the power to demand attention, and the interest to question and judge the official effectively. Although this may not happen regularly, or at all, lacking the attribute of likelihood, if they call the official to account it might be expected to be a rigorous investigation. It would take little more than a problem with the project to enable this forum to become central to the accountability activity of the SRO. Accordingly, they are managed carefully and with discretion, and the official may often keep them 'on-side' with briefings or information, even if they do not demand it.

The *dependent* forum requires the authority of other forums to be able to hold the SRO accountable. These are groups or individuals with specific expertise, that want to hold the official accountable, but they lack the authority to impose on the project leadership. Participants identified a variety of officials and government bodies within this domain. They often use the authority available by becoming part of a wider legitimate forum, such as a programme board, to enact their requirements. The *dangerous* forum has power and is likely to call for an account, but lacks focus and expertise, and can be difficult for the official to manage. The lack of expertise can make the information asymmetry between the informed official and the uninformed forum a challenging aspect of the relationship. In this case it is not the lack of information provided, but the inability of the forum to deal with the information in a manner that the SRO feels is appropriate. They frequently cited a lack of capability and understanding as a problem in many of the relationships with account holders. This included some ministers and government committees. An example of this was the PAC, which was often described as being a powerful forum, but without the knowledge or capability to properly interrogate a

project leader. This is described later in chapters 5 and 7, and typical comments questioned
their expertise.

> *I think project knowledge is improving but I don't know if there is enough experience on projects within the members of the PAC committee. What have they done?'* [#115]

> *I think it's a very good description "dangerous forum" and in fact I've tried to move them from this dangerous forum into a definitive forum and have actually funded posts too, for particular user communities to ensure they can come and be better briefed and informed.* [#116]

> *I think that most of my accountabilities are in this overlapping circle of the dangerous and definitive, there are a few in the detached forum. There are some where you have an inter-ministerial task force with ministers from various departments, and the way in which that whole committee is structured and serviced means they don't really have any time to dig under the skin of any particular issue and it's all high level stuff. They can alight on your latest red risk or something which has been red or amber for a while, and they ask quite aggressive questions about what are you doing and sometimes from quite an ill-informed base, and you can find yourself having to take them back six or seven steps to explain why the policies are there, and say to them, this is actually your policy, and your predecessor committed to do this two years ago, and here we are now doing it for you.* [#117]

A forum with three attributes is a very salient account holder

The *definitive forum* possesses all three attribute groups. With a powerful or legitimate forum, possessing expertise or focus, a demand for accountability is definitely perceived to require the attention of the SRO. The expectation may be regular, like the programme board, or it may be unusual but urgent, such as a specific review for a minister. This combination of attributes formed the basis for a list of the most salient accountability forums. This group usually included the permanent secretary of the department, the programme board, and often the PAC (despite many SROs' concerns about them being more naturally in the *dangerous* category).

> *The PAC is set bang in the middle - a definitive forum!* [#118]

Forums without the full suite of attributes can become *definitive* by acquiring the missing ones. A stakeholder who wishes to urgently call the official and their project to account, and has the expertise to examine them, but lacks the legitimate authority, could attempt to influence a forum which has that authority. They could create a coalition that could then demand accountability in the area of interest. Any stakeholder that is not a *definitive* account holding forum will need to ally themselves with those that are, or in some way develop the necessary attributes if they intend to call the SRO to account effectively. This process can be seen in the gradually widening membership of some programme boards. These bodies have legitimacy and authority and there is an expectation that the official will appear before them on a regular basis. Groups across the department, and wider government, try to join the board, using it to provide them with the legitimacy and expectation that they may not otherwise be able to exercise. The programme board as a *definitive* forum is perceived to attract interest from less powerful stakeholders who want to exercise accountability. They are not always successful.[51]

> *The IPA would like to have a seat on our board, but the Department likes to keep them at arm's length.* [#119]

Deemed forums: Impact but no attributes

The *deemed* category represents those entities that are felt by the official to act as a 'virtual forum' (Bovens 2007b, 184) in the way they feel about the role. Where an institution has no authority and legitimacy, no focus and expertise, and is not expected to call the official to account, it would not normally be perceived as an accountability forum. To an external observer these forums may appear irrelevant. However, there are some that had no discernible or effective attributes, but to which the official felt under an obligation to consider themselves accountable. This category includes the public as taxpayer, the expected users of the service

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[51] The willingness of some SROs to add less salient forums to their Programme Board can be partly understood as a means of reducing the forum management burden they would otherwise face. Transaction cost theory may explain why the SRO encourages them to join a powerful forum and achieve account-holding capability through that body.

being developed, and the project management profession. Several noted how important it was, when giving an account, to be seen to be effective in their roles to the new profession.

> *We are beginning to see project delivery as a profession here and that's important to me, and you wouldn't want to let the side down.* [#120]

When moving beyond the identification of forum salience to how the SRO manages the environment, the way officials feel about themselves within their role has an impact, and this is influenced by their perception of these deemed forums. The SRO's peer group is a deemed forum, as although they may have expertise, they could never actually call an SRO to account.

Accountability Relationships are Dynamic

Forums do not remain neatly within the schematic categories. Their power and competence fluctuate as the individuals in a forum, or their priorities, change. The expectation of being called to account varies throughout the period of the project. A snapshot of the accountability environment would provide evidence of a range of forums which an official could rank in salience. But this salience changes, and accountability relationships throughout the environment become more or less demanding for a variety of reasons. In the general description of their roles, in chapter 3, officials described the dynamic nature of the environment of major projects. Their interaction with forums varies according to the stage of the project and the priorities of the forums themselves.

> *I think your accountability changes depending on the phase of the programme lifecycle, I think the risk you're exposed to necessarily varies with time and with stage.* [#121]

The attributes are a matter of perception and not an objective fact. A more appropriate understanding of accountability in action might be less of a snapshot and more like Halachmi's (2014, 564) description of 'time-lapse photography that catches the evolution of the administrative process and programme implementation.' Relationships with forums can also be subject to sudden change for a variety of reasons. Officials were keenly aware that the environment was dynamic and much of their time was dedicated to understanding a changing

mix of forums, where like Mitchell's (1997, 868) description of stakeholders, 'each attribute is a variable… and can change for any entity.'

Dynamic is used here to denote the constantly changing salience of the forums over time, from the perspective of the SRO. [52]   This requires the management of forums that have shifting competencies, authorities, and interests. Over time, forum priorities change, forum personnel change, and forum attributes change.   Departmental committees and units within the Treasury and Cabinet Office are subject to regular changes in personnel, role and emphasis. Their perceived legitimacy is dependent upon their staffing and behaviour. Changes in a select committee chair, or PAC membership, have an impact on accountability relationships. SROs operate at levels where changes of ministers, or changes in their ministers' priorities, are seen to impact the project environment and thereby influence their ability to achieve project outcomes. The impact of ministerial changes was frequently raised as a problem. [53]   One consequence of the changing nature of a forum's attributes is that the officials need to be adept at recognising shifts in their authority or interest.

4.3 Judgment and sanctions

An SRO can expect that any account they give will be judged. For most of their account giving there was little anticipation of this being much more than an acknowledgment. Few occasions result in any serious consequences. In some instances, where the project was running into trouble, where the forum was not content with the outcome, or if they had performed badly in delivering the account, they expected there to be some consequence as a result. There was a clear distinction between account giving as a routine, low risk activity, and account giving as a higher risk, consequence laden activity, even when the accounts were for the same forum. Many occasions were described where a forum receiving regular accounts moved from benign to malign in the perception of the SRO, and their account giving became a much more serious

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[52] The term *dynamic accountability* is used in other contexts, such as the development of recursive and network accountability relationships (Mansbridge 2014, 63).
[53] It is often the *change* of minister that was felt to be a problem, rather than the new minister themselves.

matter. When determining how to respond to a forum, the range of possible consequences available have an impact on its perceived salience. If there are no effective consequences as a result of giving an account, or no potential for sanctions to be applied by the forum, then it is fundamentally a process of information exchange (Mulgan 2000, 556). An institution that can hold an SRO to account and then apply a significant sanction if not satisfied with the outcome is taken more seriously than one where no sanction is likely or possible. From the commentary on the outcome of giving an account, three themes emerge about the perception of sanctions. These are the prospect that a forum might impose a sanction, the legitimacy of that process, and the type of sanction that the forum might apply.

The likelihood of sanctions

The SROs perception of the term *sanctions* as more negative than *consequences* was described in chapter 1. Many SROs commented that they faced few major sanctions but there were some adverse consequences. They had no doubt that if they were perceived to be the cause of project failure then they would face sanctions, which could include their removal from their post. However, few of those interviewed felt that their personal management or control of the project would be the cause of failure. Opinions differed about the prospect that being held to account, and not satisfying a forum, would result in some form of sanction. Some SROs had few doubts that in the event of any problems, sanctions would apply to them. Others felt that the environment was so complex that it would be impossible for a forum to penalise them personally. There were few forums that were felt to have the authority and capability to apply serious sanctions. Those that were capable were those with the hierarchical management position to have an impact on careers, such as the permanent secretary or the programme board. Ministers were felt to be in this position but as personnel management is undertaken by the permanent secretary rather than ministers, it was the permanent secretary who was described as authoritative in this respect. Being found wanting by the PAC could end up with sanctions imposed by the permanent secretary and this is explored in chapter 7.

The environment within the SRO's department has an impact on their perception of the prospect of judgement and sanctions.

> *It might be the culture of the department, but it doesn't feel too much that I'm likely to be blamed here. Perhaps it should feel a bit more like that I don't know but I think its part of the departmental culture, and this is one of the more supportive type departments in Whitehall and it has a nice collegiate and collaborative environment. Departments are culturally very different.* [#122]

There is also a feeling that it would be difficult for those outside the department, including parliamentary committees, to be able to pin a problem onto a specific official.

> *They'd like to point the finger at somebody and whether that's fair of a select committee or not I don't know, it's an interesting debate, but I think that a lot of people would go before me. It would probably be unfair, because politicians would probably duck, so they'd probably go after the department, but I don't think it would be me I suspect.* [#123]

Assessing the legitimacy of forum sanctions

From the perspective of the official, the prospect of sanctions depends upon the forum's *capability to judge* which they base on its inherent power, expertise and focus. They also consider both the legitimacy of the forum to act in judgment, and its legitimacy in applying any sanctions regime. Where the evaluation process was felt to be flawed, or where those demanding accountability were perceived to lack legitimacy, an official may not regard such actions as appropriate. The process is important in determining how seriously the SRO took the sanctions that could follow their account giving activity. They choose to see the likelihood of sanctions as either something to be worried about, or as so arbitrary or lacking legitimacy, it could be discounted. This was not a view that the sanction applied was irrelevant or minor, but that a sanctions process which lacked legitimacy was not one that could easily be managed.

The PAC is an authoritative account-holding forum, but is not always seen as legitimate in its behaviour and some SROs see its ability to judge a good or bad project leader to be limited. What an observer may perceive to be justified interrogation of an official may be

perceived by that official to lack legitimacy. The PAC is felt to demand oversight of easily

measurable outcomes, which SROs felt were not always relevant to their investigation, or the

assessment of their projects at that time, matching Mansbridge's (2014, 61) description of being

to 'monitor the process and punish.' Some accountability mechanisms were felt to be

synonymous with punishment. A few officials expressed this in their comments on the IPA

annual report (IPA 2016, 1) which referenced 'the increased accountability of SROs'. They

chose to recognise this as referring to a collection of sanctions-based mechanisms, rather than a

comment about the normative basis of accountability, like integrity and honesty.

> *Sometimes people say what they want is accountability when what they really want is*
>
> *someone to blame when things go wrong. When things go wrong, they want some head*
>
> *on the block. That's different from driving up quality and ownership of projects across*
>
> *government.* [#124]

The civil service invests heavily in the ex-ante process of selection for the senior

officials appointed to posts as DGs and who consequently become SROs. The notion of serious

sanctions being applied to an SRO when their project was in difficulty was often perceived to be

an attempt to apply a sanctions-based *accountability as mechanism* approach to individuals

operating within an *accountability as trust* values system.

> *Who would you get to do these jobs if they felt that they would genuinely be the ones*
>
> *who would be pilloried for failure... you wouldn't get people to do these jobs.* [#125]

The result was that SROs described their major concern as damage to their credibility and

reputation rather than demotion or losing their post.

Reputation is the concern, not replacement

There was little clarity about what sanctions might actually be available to those demanding an

account from an SRO. During the interviews, comments about the consequences of being found

wanting when giving an account ranged from '*removal from post*' [#126] to '*a damaging remark*

which would ruin my reputation' [#127]. Within the civil service there are sanctions that can be

applied to officials whose performance is found to be below expectations. These apply both to individuals who commit offences or are guilty of misconduct, and for those who do not meet the necessary performance expectations. If a project was seen to be in difficulty and the SRO was seen to be culpable, they may be removed from that role or may have some of their responsibilities reallocated. For many DGs, their SRO activity is a small part of their day job and so it could be transferred to another individual. For those in posts with bonus arrangements there could be an impact on their financial reward. These might be regarded as major sanctions for a career civil servant although they were infrequently raised as a concern during the interviews. For some, the impact was seen to hold little importance.

> *I have no real aspiration to be permanent secretary here, so I'm not really worried about what happens within my role.* [#128]

The credibility of serious sanction was doubted by many SROs. As Brandsma (2013, 136) notes, public officials face a variety of possible sanctions but they seem rarely used and have high transaction costs for those applying them. A permanent secretary firing an SRO is exposed to personal reputational damage so reallocation may be preferable. If any sanctions were to be applied, SROs expected any such action to be imposed by the permanent secretary. Although considered extremely unlikely, serious sanction by a forum is not the only impact they face. The most frequently cited concern was the potential impact on their personal reputation, and their embarrassment, should their performance be criticised. This may fall more into the *consequences* category than sanctions but was perceived by the SROs as a serious matter. Their concern was to be seen as a good performer, giving the forum, and others, the right impression (Goffman 1959, 15). From this perspective even a disparaging verbal comment at a committee, or an adverse note in an email, may be perceived as a sanction rather than a minor consequence.

> *The worst thing I can imagine is being thought of as out of my depth by the rest of the board. Careers here can founder on a sharp intake of breath by the Perm Sec.* [#129]

This concern for both personal and project reputation supports Busuioc and Lodge (2016, 247) who proposed a reputation based approach to understanding accountability relationships. Few

sanctions were identified by SROs other than being criticised, publicly or privately, leading to reputational damage.

> *I am concerned about my reputation. As SRO you find you are accountable when things go wrong and there is always something that can trip you up in something this big. Your reputation is on the line every day, in lots of minor ways, and not just when you appear at a committee or in front of the minister.* [#130]

> *Why do I think people are scared of these organisations? I think their reputations are likely to be tarnished or their team's reputation may be tarnished.* [#131]

This reputational damage was not only delivered by the forum to which the official was delivering an account. Judgment and sanctions can follow an evaluation of their performance with another forum. A poor appearance at a PAC hearing, conveying an impression of not being competent as a senior civil servant (rather than being accountable for a failing project) may result in ministers or permanent secretaries taking action and applying sanctions. Officials expressed concern that their careers would be damaged by poor performance defending their actions, rather than for being held to account about a failing project. With their perspective that most GMPP projects were likely to have major problems at some stage, and they were all capable of being called to a PAC as a result, it was expected that they would then have to defend themselves, their department, and their minister. At this point their reputation would depend upon their ability to cope with a committee hearing and its questioning, rather than how they had managed their project.

This is the other side of Busuioc and Lodge's 'reputational benefits' that accrue from being seen as reputable (2016, 248). It is not just within the department that reputation was seen as important. SROs frequently expressed concern that they would not wish to be embarrassed in front of their experienced SRO colleagues, and their peers from the MPLA. This group falls into the *deemed* category, and SROs felt that they acted as if they were accountable to this peer group if they gave a poor performance at the PAC or other public forums. The lack of significant reference to sanctions other than reputational damage supports

the explanation of SRO accountability being experienced as based on trust rather than sanctions, and aligns with the public sector 'selection core and sanction periphery' described by Mansbridge (2014, 59).

Conclusion

This chapter opened with the challenge facing SROs of identifying their account holding forums and determining which ones are the most important or salient. Twenty types of account holding entities were identified by the various SROs interviewed. These forum types possessed a variety of attributes. They are not all considered to be equally important or effective and SROs make decisions about how to manage their forums based on their assessment of forum characteristics or attributes. From the analysis I suggested that the SROs decide which are the most salient account holding forums based upon their assessment against various combinations of three groups of attributes. The three groups were proposed as authority, interest, and likelihood.

Most SROs evaluate the salience of forums intuitively although a few had a more structured approach. Using the three attributes, I have proposed a typology of forum types. Forum attributes are not fixed, and the environment is dynamic, so a major aspect of the SRO's role is the monitoring of forum salience and responding to changes in their demands. The ability to impose sanctions was an important aspect of the salience of a forum. The typology, and its depiction in a schematic, can act as a heuristic for considering and describing forum salience. In the next chapter this model of salience is used to describe and categorise the principal forums identified by the SRO.

Chapter 5. Categorising Forums

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Sometimes you just need to stand back and think about all these people trying to hold

you to account. They all have some valid reason, perhaps to them, but how to balance

all of that is the daily challenge. I just think which ones can do anything, which ones

know what they are talking about, and which ones are going to come knocking. If they

can do anything, I think about them but don't always need to do much. If they tick all

those boxes, I think about them a lot. When I think about it, this job is mostly about

working out where the next serious accountability demand is coming from and trying to

get one step ahead. [#132]

SROs consider the attributes of a forum when deciding how to manage an accountability

relationship. I have proposed a model of forum salience and a typology with combinations of

three groups of attributes. The various types of forum identified by SROs were shown in figure

4.1 on page 115. This chapter demonstrates the use of the typology to categorise them and is

based upon the SROs' personal perceptions at the time of their interview, and on their

experience of interacting with the forums. The first group considered are those within the

departmental management structure and includes permanent secretaries, ministers and the

SRO's programme board. These featured in almost all the interviews. The second group relates

to parliamentary scrutiny and includes the NAO and parliamentary committees. A third group

covers the Cabinet Office and Treasury. The final group covers the remaining forums

mentioned by the SROs. This includes the *deemed* category.

The perceived importance of the forums is distinct from the number of times they were

mentioned during the interviews. SROs described the amount of time and management activity

that different forums occupied, and how much concern they had about the potential for this to

escalate. It would be simple to assume that the forums that demanded most attention were those that mattered most to officials, but this was not always the case. A forum that has a high likelihood of calling for an account, but which possesses no expertise or authority, may be more irritating than effective, yet occupy considerable management time.

5.1 The most salient forums: Departmental management

Three of the most salient forums are found within the hierarchy of the department and are shown at figure 5.1. Two of them, the Permanent Secretary and the SRO's Programme Board, were always in the *definitive* category, having elements of all three attributes: authority, interest and likelihood. They need managing precisely because they have the authority and capability to hold the official to account and are expected to do so on a regular basis. They also have sanctions they can impose in the event of the given account being found wanting. They were referenced by most of the SROs interviewed.

I mainly feel that I'm accountable to the board and the permanent secretary. [#133]

Figure 5.1 Typology: Departmental management
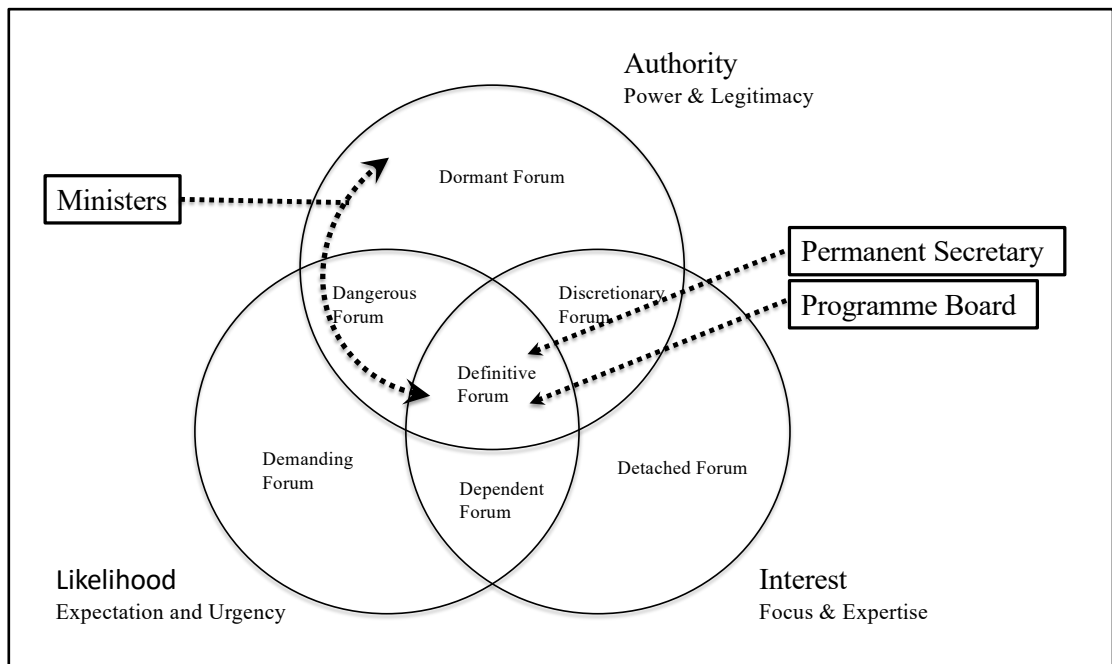
Note: Dotted lines indicate SROs perspective of forum location within the typology

Even where there were doubts about the knowledge or capability of these forums it was not seen to diminish their definitive status. The political leaders of the department are the third forum in the departmental hierarchy. Ministers were referenced in less than 60% of the interviews and although they were always felt to have authority, there were mixed opinions on their categorisation, which ranged from *dormant*, through *dangerous* and only occasionally into *definitive*.

The Permanent Secretary

Almost all SROs feel accountable to their permanent secretary. The three that didn't describe the permanent secretary as a forum were operating in structures where they are one level removed from reporting directly and felt that their accountability was to their immediate superior or in one case directly to a minister. There was no sense that the permanent secretary wasn't an important forum, but they didn't expect to be held to account by them. They described a *thread of accountability,* explaining that whilst they were formally accountable to the permanent secretary as the departmental AO, they did not report directly to them, but through an intermediate project sponsor or internal board. All the other SROs recognised their permanent secretary as one of the most salient forums. The permanent secretary is accountable to the political leadership of the department for everything that happens within it. They are consequently the normal line manager for their SROs, and there is an expectation that they will call the SRO to account regularly for both expenditure and performance. As the individual responsible for the SRO's civil service career they hold considerable influence. SROs are acutely aware of the reputational aspects of their performance and their project's profile in the opinion of their permanent secretary. That impact on reputation is felt by many to be the strongest sanction they face.

> *I think everyone would feel accountable to the Perm Sec ultimately.* [#134]

> *Keeping the Perm Sec up to speed, with no surprises, is vital. He takes a keen interest in the project and I try to ensure he gets regular updates and when we hit the media, I'm normally in front of him within minutes. He is always supportive but if I let*

him down my career could be over, and I still have a good few years left in the department. [#135]

I'm accountable to the permanent secretary for managing public money effectively, and I get that letter of delegation from them. [#136]

The thread of accountability from the department's permanent secretary, through the DG, through to me, is quite clear. [#137]

Sometimes I don't think the Perm Sec realises how badly things are going and isn't keen to hear that sort of news. It can be quite a push to get them to tell the minister sometimes. I don't think my reputation in the department would survive if I kept bringing problems. I just get told it's a difficult project, we know it will not be easy, get on with it. [#138]

Most SROs report to the permanent secretary on a regular basis, weekly or monthly. These could be on a one-to-one basis or at a regular senior staff meetings. Those who didn't report directly to a permanent secretary had a senior figure within the department in that role.

I don't actually have meetings with the permanent secretary, that's managed through a senior sponsor, to whom I provide monthly reports. [#139]

I report to the chief finance officer and through them to the accounting officer, the Perm Sec, so you have got an independent assurance model, and actually Treasury and IPA like that because they see that is working well in the department. [#140]

There is no standard way that permanent secretaries hold their SROs to account. Some insist that the SRO is a role for a DG, on their departmental board, and others delegate the role further down within their department. Some hold meetings regularly and others sporadically, and they use a variety of internal departmental mechanisms. Internal audit and investment committees regularly act as accountability mechanisms, investigating the project and then providing assurance reports to the permanent secretary. The position is seen as the nexus of a variety of departmental mechanisms working together to oversee the SRO. Although SROs questioned the project or implementation expertise of some permanent secretaries, this situation is felt to be

improving as GMPP projects become more integrated into departmental business. Short courses about major projects have recently been initiated for permanent secretaries at the MPLA.

> *A session for ministers and permanent secretaries to come along to try and understand some of the stuff about what SROs are doing has been a real help.* [#141]

Whilst their project management expertise may be questioned, as the departmental accounting officer, close to the origin of the policies that the projects are implementing, they are still felt to have the focus and expertise needed as a definitive forum. Their real expertise is felt to be their broad experience across both the department and the wider Whitehall environment.

Ministers and Secretaries of State

Ministers clearly have the power and legitimacy to call their departmental SROs to account, directly or through the permanent secretary. Most interaction between the minister and SRO will be via the private office.

> *I kind of feel accountable to ministers.* [#142]

> *Ultimately I'm accountable to ministers for implementing the policy as they have written it. So, they set the policy and the Minister holds me to account for making sure that the customers are looked after appropriately as part of us delivering effective service.* [#143]

> *We are delivering one of the minister's priorities, and we are accountable to them and need to understand their requirements and need to try and give them what they are looking for.* [#144]

Accounting can take the form of meetings, or reports, or via briefings through the hierarchy of the department, to the private office, or direct to the minister. SROs expect to be called to account directly to the minister if there is a problem that might impact on the department and the minister was required to answer questions in Parliament or from the public or media.

> *I meet ministers once a fortnight on average.* [#145]

I've had engagement with ministers, not that often, a few times, but it's usually around specific point issues where we've made a mess of something or some particular thing which made a news headline we'll have to explain, they're just interested in legislative intent being done. [#146]

I do monthly reports for the Minister. [#147]

SROs have concerns about the focus and expertise of their ministers and secretaries of state when being held to account. This also covered their experience of the staff in the private office. Ministers were placed within the *dormant* or *dangerous* forum category. Accountability is affected by the information asymmetry between the SRO and minister.

I think in terms of most major programmes, with few exceptions, that ministers are not that interested. [#148]

I can think of one minister in particular who was simply unable to deal with detail and while on the whole most of the people in these roles are intelligent, thoughtful people, occasionally they're not. [#149]

Most decisions tend to be made in informal meetings I think, and the really big decisions that are made with ministers and with senior officials are not always on the basis of much of the management information that we've had to produce. [#150]

When they think of programs, how many of them have come from real delivery background compared to think tanks or the law where things are very simple. Sometimes people distil complexity into simplicity in order to create their own brain space, so I think it is a challenge for them. [#151]

As a result, the ministerial-SRO accountability mechanism was not always regarded as effective.

How much of our internal process or lack thereof is exposed to ministers, not much to be honest, though they would just say this is your problem - get it sorted out and hit your targets. [#152]

> *I don't have separate meetings with the Minister either. I think with a project of this importance that I should, but I don't.* [#153]

Sometimes it wasn't lack of expertise that caused problems, but their short tenure in office, or modifications due to wider policy changes. The longevity of projects exceeds that of ministers. In a report from the Institute for Government, Durrant and Lloyd (2019, 1) describe the bewildering nature of life for a newly appointed minister, whose average tenure in the administrations between 1997 and 2015 was just 21 months. Ministers are felt to be prone to changing priorities, particularly on change of administration, and also as political imperatives change the focus within a department. This was described as the cause of problems in some major projects and this can reduce the perceived legitimacy of the minister or the private office as a forum in the eyes of the SRO.

> *I have felt responsible to some ministers, but more probably a sense of government as a whole, it is an overwhelming kind of feeling, and usually because the ministers are people who are causing the most problems, so it's not as if I feel I'm delivering the project on their behalf.* [#154]

> *My job was totally consumed last year by trying to find a way of re-planning the project, which was millions over budget, and years late. At that time decisions made by ministers, within and beyond this department, against our advice, had resulted in further problems due to lack of affordability. That's a big issue, and it's never properly acknowledged in reviews, the role ministers play, in the way that programs are seen to have failed when they are going over budget, or were overambitious to start with, and we see that regularly, almost on a daily basis.* [#155]

> *I suppose ministers are seeking to hold us to account for the outcomes of the programme, but they aren't 100% clear about things, they're working at a very high level.* [#156]

> *I then went and explained it all to my various ministers. A complication in the middle of that process was that one of them resigned.* [#157]

Although frequently regarded as not having the experience or time to understand the complexities of their departmental projects, some ministers were identified as being particularly capable, moving their account holding activity into the *definitive* category.

> *The next Secretary of State, I did actually take the problem to him in his first day and he was absolutely fabulous because we were just days away from a possible PAC hearing and he was wonderfully charming and said 'Don't worry, I'm used to people bringing me problems' and took a real interest, and took time to understand the problem, which I thought showed his maturity, and his calmness under fire, and I just thought, we've fallen on our feet here thank goodness.* [#158]

Whatever their interest in the project, ministers always have power and legitimacy, so SROs ensure they are kept routinely informed about their projects. This was seen as a normal obligation for a senior civil servant and not specific to their GMPP roles. The traditional concept of ministerial responsibility for departmental activity is still supported by the mechanisms holding SROs to account within departments. Recognising that lack of focus and expertise is a problem, and that ministers have limited time to devote to understanding the complexities of projects, most SROs prefer to keep briefings through the existing accountability mechanisms of internal departmental reports and via the permanent secretary. On the other hand, these relationships are felt by some SROs to be changing as a result of the Osmotherly rules. This impact is described in chapter 7.

The Programme Board

The governance structure for major projects varies between departments. Most SROs have a programme board, established to provide some form of departmental oversight of the programme. Some are called an executive board, functional board, or executive committee, but have a similar function. (These are distinct from the departmental committees with the same

names which are chaired by the permanent secretary and comprise the department's senior management team). The programme board was often described as the most authoritative forum to which an official has to account. In some cases, the SRO chaired the board, and in others the SRO was a member, with an executive or non-executive chair. Boards meet regularly, normally once a month. Although they are one of the principal accountability mechanisms within GMPP projects, they have no prescribed structure or membership. Their organisation depends upon the nature of the project and the approach to governance taken by the department or the senior executives involved.

A large infrastructure project may have over 30 individuals on the programme board, with an independent chair and non-executive directors. Some have numerous subcommittees for different aspects of the project. A small project may have fewer than 10 on a programme board chaired by the SRO. Some have full members and associate members, and some attendees are given voting rights whilst others are regarded as observers. Some departments place a non-executive onto a project board. Others have membership determined by the SRO to bring together key constituents of their stakeholder and accountability networks.

> *There is my internal programme governance as well… which is kind of a programme board, where I have a non-executive chair.* [#159]

> *This is a large programme, so we have somebody from industry to give us external challenge, we also have associate members of the board including the IPA and the Treasury.* [#160]

> *When I first arrived into this role, one of the programme boards had about 30 people on it and my first question was well what do you all do, and some of their response was "well I'm just interested". So we have put in place a clear view of people who are full members and they have voting rights, versus those who are associate members, and don't necessarily come to all meetings, but will get all the documentation, and will be invited if there is an item that is relevant to them or their domain or their own levels of accountability.* [#161]

The literature on public boards focuses on semi-autonomous agencies and considers structure, board remits, and their contribution to organisational success, where their effectiveness is frequently questioned (Cornforth 2002, Schillemans and Bovens 2018). The effectiveness of the programme boards for major projects might be examined in terms of project success, although there could be substantial debate about how one might measure their involvement in the outcome of a project. However, from the descriptions of their programme boards, many officials would probably agree with Cornforth's (2001, 217) comments that 'boards are either accused of meddling in the affairs of management or conversely that they are not involved enough.' Whether meddling or holding back, the programme board was usually seen as the most salient account holding institution for an SRO. Consequently, it was the forum where they felt most *held to account*, as it comprised a wide range of individuals who had the skills and experience to evaluate their role, and it met regularly enough to be up to date on the project.

The concept of *the board* can be more complicated than it appears at first sight. They exist within complex governance structures, often with multiple boards operating hierarchically within a department. All these institutions can have accountability relationships with the SRO. Clarity of the structure does not imply reduced accountability burdens for the official.

> *I chair our programme board, that has the key policy leads for all of our policies where we have dependencies, that covers the whole of the programme, and that is underpinned by separate boards which specifically focus on aspects of the programme.* [#162]

> *We've got our own programme board and that gets support from a number of other subordinate boards for particular areas, and we feed into a departmental portfolio board and then that board in itself reports into the management board.* [#163]

> *I'm a member of our programme board, and a number of other programme boards in the department, where there is a dependency with my own programme.* [#164]

Whether as chair or a member, the SROs described feeling accountable to the board as an organisation.

There is a project or programme board that sits on top of that and so my accountability is to that project or programme board. [#165]

That's the language that we use, that we talk about the board, or my board, and that's the language in which we write the minutes, so decisions are taken by the board and I see my accountability to the group rather than the chair. [#166]

They meet regularly and provide the SRO with a mechanism for dealing with a variety of other forums.

It's a structured agenda with the usual items around progress, dashboards, in the usual way, including finance, milestones, risks and so on, for all the others who attend… that's where I'm held to account for the overall progress of the programme. [#167]

The salience of the forum did not always overlap with the SRO's perspective of how effective that relationship was in supporting their project management.

The programme boards can end up very big indeed. We did a review of them recently to try to bring in a smaller more focused one of people who are supporting me and the team, and then a much wider stakeholder advisory, because you got so many users in in the programme board here, it can be 40 people and it can be very unwieldy. [#168]

In a normal world I would feel accountable to the programme board, which would have representatives from all of the claimants here, and the programme board would be the place where decisions are taken, and where I have to rock up with my homework done, complete and on time, otherwise bad things will happen to me. The programme board here does not have that function. It is much more of an informational, tick box exercise. 'Do you have a programme board?' I'm asked at gateway reviews. 'Yes, I do' I reply, I'm not asked does it make effective decisions, I am merely asked if I have one. [#169]

5.2 Parliamentary oversight

Parliamentary committees have a remit which covers the examination of government projects and there are two types of committee that can hold an SRO to account. The first is a departmental select committee, which examines departmental expenditure, administration, and policy. They are specific to departments, so projects with the Home Office could be reviewed by the Home Affairs Committee and the Work and Pensions Committee could review projects in the DWP. These departmental committees have a role scrutinising policy as well as administration and expenditure. The second committee which can scrutinise SROs is the Public Accounts Committee (PAC) which has a different remit to the departmental committees.[54] The parliamentary website explains the remit of the PAC as scrutinising value for money covering the 'economy, efficiency and effectiveness of public spending and generally holds the government and its civil servants to account for the delivery of public services' . The PAC looks at 'how, rather than why, public money has been spent and does not examine the merits of Government policy' (www.parliament.uk 2019b).

Supporting the activity of the PAC is the NAO. With the PAC it forms 'the two key institutions in the state-audit framework in the UK and English central government' (Dunleavy et al. 2009, 4). The NAO undertakes the financial audits of all government departments and has a programme of value for money audits for issues determined by the PAC. Their remit, on behalf of Parliament, gives them the authority to undertake reviews of GMPP activities. As an audit body it has the experience and expertise, or can call upon it, to ensure that they are able to bring knowledge and focus to bear on projects during their investigations. Uhr (2014, 235) notes that '*an accountable civil service* is hard to conceive in the absence of a powerful and well-resourced state audit function.' Together, the NAO and parliamentary committees, create a significant accountability regime for the SRO. Their categorisation is shown at figure 5.2.

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[54] Another cross departmental committee is the Public Administration, and Constitutional Affairs Committee (PACAC) which has a general role examining constitutional issues and the quality and standards of administration within the Civil Service. It's remit would not usually cover GMPP projects although in 2018 it launched a review of the management of the government's major projects (www.parliament.uk 2018a)

Parliamentary Committees

During the period of this research, 8 separate GMPP projects were considered at 10 departmental select committee hearings (from November 2016 to October 2019). Given the number of projects during that time this equates to a 1 in 60 chance that an SRO could be called to give an account to a departmental select committee during a year, although not all hearings actually called the SRO to appear. The list of these departmental select committee hearings is at appendix 3.

Figure 5.2 Typology: Parliamentary oversight
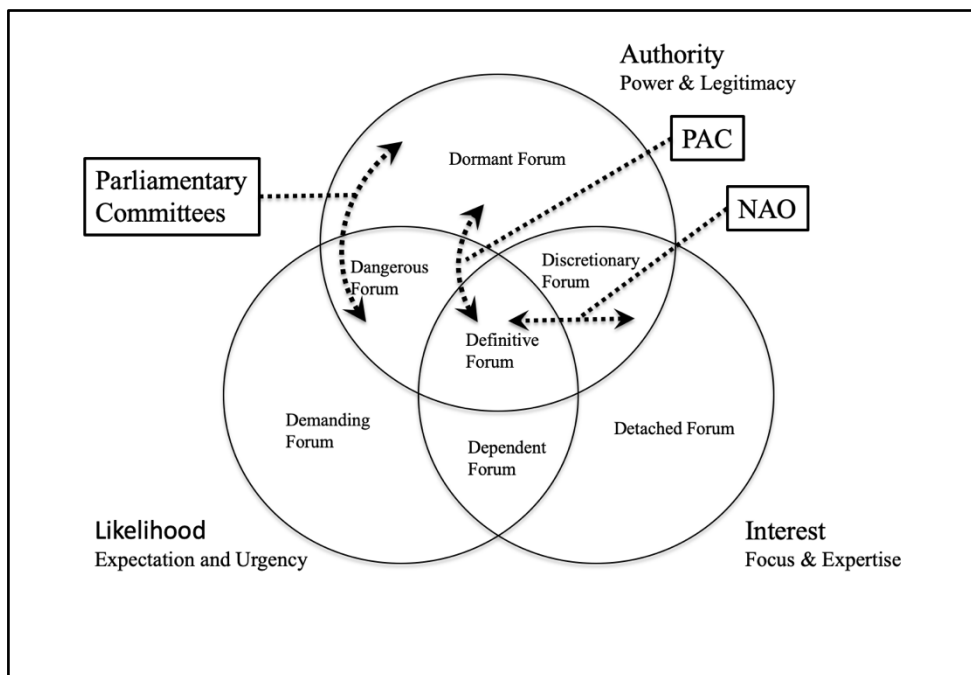
   Note: Dotted lines indicate SROs perspective of forum location within the typology

With such a low likelihood most SROs expressed limited concern about the departmental select committees as a forum. For SROs not currently engaged with committees they were perceived to fall within the *dormant* or *dangerous* category, as they were not felt to have the specific expertise necessary to fully understand the nature and complexity of a major project.

       The PAC is felt to be more significant. It determines the annual NAO programme of reviews which may include major projects that have come to their attention, from their members interests or their connections with lobby groups, trade unions, academics and journalists. The

committee is staffed by MPs from different parties and by convention is chaired by a senior figure from the Opposition. The committee has the power to call civil servants to account and their questioning is carried out in public. During the period of this research, GMPP projects appeared 42 times at the PAC, which equated to a 1 in 11 chance that a project would be called during the 2015 parliamentary session and a 1 in 15 chance during the 2017 session (See appendices 4 and 5). SROs are not always called but some have had three or more appearances during that time.

Whether or not the participant had been called to a hearing, every interview included comments about the PAC. However, not all SROs said they would feel accountable to the committee despite their appointment letter making it clear that this accountability relationship existed.[55] This ambiguity was explored during the interviews. There was never any doubt about its power but there was considerable doubt about its real effectiveness as an account-holding mechanism. Those who did not feel accountable to the PAC, despite their Osmotherly letters, usually based their opinion on their perception of the capability of the PAC to be effective (it was often felt to lack expertise), or that the committee would be unlikely to ever call for them to appear.

> *The PAC is certainly a definitive forum for some projects, but I can't see them ever holding me to account. My project is far too small, and they don't really go after this department very much. I don't think I feel accountable to the PAC despite my letter telling me I am.* [#170]

For those regarding the PAC as effective, it was often described as the 'ultimate' account-holding forum.

> *I am accountable…I suppose to Parliament through the PAC.* [#171]

> *I feel accountable to my stakeholders and ultimately I know I am accountable to the PAC, and that will come into sharper focus depending upon the quality of the job that I do.* [#172]

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[55] Only 41 of the 47 SROs interviewed regarded themselves as accountable to the PAC.

> *The ultimate accountability worst-case scenario probably comes off the back of the PAC, because if things go very badly wrong there, that would be horrendous.* [#173]

What they meant by effective, or by a horrendous appearance, is explored further in chapter 7. Using the forum typology, participants were able to describe where they positioned the committee. For a small majority of SROs, the PAC is seen as sitting in the *dangerous* category. Even when there is no NAO review in process, they felt that there was always a chance that a problem in the project could raise their profile, followed by a NAO report, and then a hearing. Despite this being a process that could take many weeks or months, they still felt '*that sense of lurking expectation like a shadow over your shoulder*'. [#174]

> *It should really be in the definitive, but I am not sure they really understand projects at the scale we are working at and with the range of stakeholders we have. They are probably working in the dangerous forum segment.* [#175]

For the other SROs it was either *definitive* or *dormant*. Some felt that the way that the PAC questioned individuals was a problem.

> *I don't think they will be after me for a while, and this isn't in their skill set so they are probably dormant. Trouble is they get a whiff of a problem and then get the NAO to look into it and in a trice, they will move in an arc from dormant, through into definitive. Best they stay asleep in dormant as far as I'm concerned.* [#176]

> *I certainly see that the PAC has the right to pull us in, but I suppose this comes back to if they were independent and if they were completely informed, and if they had knowledge themselves, then I could give them more respect. That isn't quite the right word. I can see what that role is, but all of them have their own agendas, and so there is always going to be a limit to how accountable you feel to them because of that.* [#177]

> *These were decisions taken a few years ago but rooted in policy from 10 years ago, and they were starting to ask questions which came from a very revisionist perspective, why did you do this, and saying it was so obvious if you had done it a different way… and why did you do this… was it due to … and I thought that was very*

> *interesting in terms of accountability because people thought they were holding you to*
>
> *account when they didn't know the full circumstances.* [#178]

The lack of expertise alluded to in these comments, may not reflect the actual position of committee members who not only have access to the NAO report but also the confidential briefing notes provided by the audit team to the committee chair.

> *It's a question of how good the job the NAO has done for them. ... They are well*
>
> *briefed, but they often read a lot of questions without necessarily the follow-up.* [#179]

Despite its authority, the PAC as a '*dangerous*' forum is felt to lack capability to fully hold officials to account for two reasons. The first is that the members lack the expertise in project delivery to understand the challenges and complexity of the environment they are investigating. They are seen to have little time to pursue specific issues despite working with a report provided by the NAO to generate their lines of inquiry. Whilst this provides the committee with areas to pursue, without further in depth questioning they are perceived to be account-holding at a superficial level. The other reason is that the members are often felt to be using the committee to further their own political ends, either as individuals wanting to catch a media headline, or as party members looking to score points against political opponents.

Seasoned observers of the PAC were less sure that it was quite so overtly political but recognised that members could sometimes say things that were 'harsh or simplistic' to attract media attention (Interview with BBC Journalist 2018, Interview with NAO Official 2019). Whatever the truth behind the SROs views, they were expressed as a concern by many of the officials interviewed. Some members were felt to be unnecessarily confrontational in their approach and this adversarial style left officials feeling less inclined to be open about challenges and problems within their projects. The nature of the 'performances' in the hearings is addressed in chapter 7.

> *The National Audit Office reported on us and the only part of the NAO report that the*
>
> *PAC looked at, and the newspaper's picked up, was the first part which is about how*
>
> *things went badly wrong in the early years. Yet quite a bit of the report was talking*

about how much good work we had done in the last two years to put things back on track, to the point that we are now beginning to deliver the benefits as promised and costs are being controlled, but they did not talk about that. The sniping at the PAC is a bit like being on trial by media and they will choose the juiciest headlines whether or not they reflect the actual position. [#180]

The NAO can be equally frustrated when their reports and proposed questions are not fully followed up, but in this case it is because there would have been more investigation of areas of concern and problems, and the departments may have been held to account more effectively (personal communication, NAO Official, April 2019). The questions that do get asked can be quite challenging to the officials.

Probably the worst thing I've had to do was go to the PAC which frankly is just gratuitous violence in my opinion. [#181]

I've watched him grill officials from certain projects, in a deeply inappropriate manner, when he's really just grandstanding and wants someone's head on a stick. [#182]

Whatever forum category the SRO considered applicable to the NAO , the PAC, and the other parliamentary committees, their perspective is now influenced by the revision of the Osmotherly guidance. This is covered in detail in chapter 7.

The NAO

The NAO are a respected body within the civil service community and seen as a legitimate and powerful forum. SROs experience the NAO as a *discretionary* forum, until it takes an interest in the project. It has the attributes of authority and interest but is not routinely expected to hold the official to account. However, for those aware of an impending NAO review of their project, the NAO was *definitive*. Whilst all GMPP projects are capable of becoming subject to a review, the lack of immediacy of such a potential investigation meant many SROs did not place it high on their list of account giving priorities. Their review programme is directed by the PAC and results in reports which usually followed by a PAC hearing. Research by Dunleavy et al. (2009) indicated that around 70% of the NAO value for money reports were followed by a PAC

hearing. The GMPP scrutiny is currently more intense and over the period July 2015 to October 2019 there were 39 reports on individual GMPP projects and 37 went on to a PAC hearing.[56] SROs gave evidence at 26 of these hearings. Details are at appendices 4 and 5.

All the SROs described the NAO as a forum that might hold them to account at some point during their tenure in post. They do not have a regular and routine inspection regime for every GMPP project but for projects in trouble, or where media and political interest had been announced, this position in the forum typology moved quickly from *discretionary* into the *definitive* state.

> *They definitely have the ability to call me in and in some ways, we are accountable to them, whether that's the NAO or the select committee.* [#183]

> *We get scrutiny from the NAO and the IPA, so we have fairly regular reviews, at both project and programme level, so there is a lot of work that is generated from those reviews.* [#184]

> *The NAO… if I keep my nose clean, they may not come knocking.* [#185]

NAO reports are public and inform the select committees' hearings. The media also refer to their reports if there is criticism of the project or its implementation and expenditure. NAO reports and the subsequent PAC hearings are subject to keen media interest (Dunleavy et al. 2009). Headlines such as '*NAO brands Government broadband project a 'train crash''* (Donnelly 2013) or '*DWP writes off £34m of IT costs as NAO slams Universal Credit'* (duPreez 2013) follow the publication of NAO reports. Consequently, both ministers and civil servants are keen to avoid adverse comments arising from the NAO reviews.

During a PAC hearing the committee is likely to focus on NAO criticism, often within reports that may otherwise be largely complementary. All NAO reports have to be cleared by the parent department, where the back stage process of agreeing the wording can diminish NAO criticism (Sharma 2007, 298), but even with softer language, major problems will still be identified. An overly redacted or sanitised report is likely to be reported to the PAC chair

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[56] There were 42 separate PAC hearings on GMPP projects over this period as some were called to a hearing more than once.

before a hearing and as it is the NAO staff that initiate media briefings on their outcomes, departments may be reluctant to go too far. This leads some SROs and their teams to be defensive when being reviewed, although Dunleavy et al. (2009, 20) report that the 'professionalism of civil servants who want to account properly to Parliament' is one of the factors that lead to a consensual approach to the reporting.

From the interviews it appears that the SROs perception of these value for money audits can depend upon their experience, as the more junior SROs appeared more concerned than others about the impact of the NAO and the subsequent PAC hearing. [57]   SROs described their openness to the NAO as being careful or reserved.

> *If you know that the NAO was breathing down your neck, and you could see a review coming up, then you move heaven and earth to make it the best possible presentations you can, regardless of where you really think you are.* [#186]

> *It is a very different approach to the IPA review than it is to the NAO. The NAO results are all public and they report their findings to the PAC and so you have very different sets of behaviour when you talk to the NAO. It's always there in the back of your head that whatever we say, whatever we share, will be made public. I'm not saying we are telling them anything different, you're telling them how it is, there's no silly behaviour or trying to hide things, or lying or misleading, but there is a constant feeling in your head, and you become risk averse.* [#187]

To avoid the adverse account holding activity anticipated in unexpected or targeted reviews, SROs described the need to develop close relationships with the NAO and keep them briefed. This moved the irregular accountability mechanism of a formal review into a more routine one of regular updating.

> *I think that's where you end up coming unstuck with the likes of Treasury, NAO and IPA, if you see them not as someone who is a critical friend but somebody more who is going to just turn up and hold you to account.* [#188]

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[57] This assessment of *junior* was subjective and related to the SROs declared experience in the role and within the civil service, but mainly on their own statement of their expertise.

5.3 Cabinet Office and HM Treasury

The Cabinet Office and the Treasury have a variety of units within them which act independently as forums. Within the Cabinet Office, the most salient is the Infrastructure and Projects Authority (IPA). Most of the Treasury units are perceived to be in the *discretionary* category are as they have power and expertise but are not always anticipated to be interested in account holding behaviour. The Treasury has teams that deal with specific departments and most account giving is to these units. Occasionally SROs deal with various other units with the Treasury, and on a limited basis with the chancellor. The Cabinet Office units often lack the authority to demand an account, but some are nonetheless keen to try, and so are felt to be in the *detached* or *dependant* categories. Their categorisation is shown in figure 5.3.

Figure 5.3 Typology: Forums within the Cabinet Office and HM Treasury
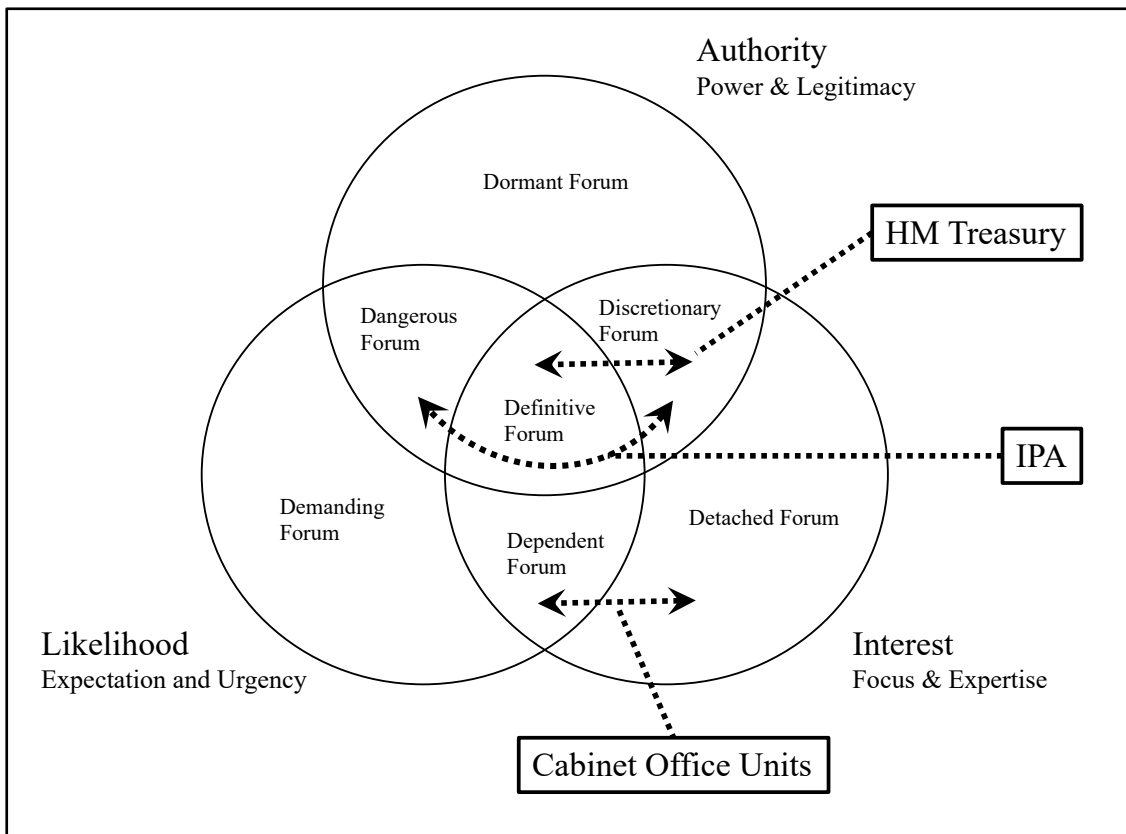
Note: Dotted lines indicate SROs perspective of forum location within the typology

The Cabinet Office and the IPA

Some units within the Cabinet Office are considered as *potential* account-holding forums because SROs distinguish between those units that have a valid claim and those regarded as less legitimate. The Cabinet Office was still being talked about in terms similar to Rhodes' (2011, 24) description as a 'ragbag of functions', although some units, notably the IPA, were regarded more favourably than others. There was unanimity about the IPA being a legitimate forum but less agreement about units such as the Government Digital Service (GDS), Crown Commercial Service (CCS) or the Government Property Agency (GPA).

The IPA is regarded as either a *definitive*, *discretionary*, or *dangerous* forum. The categorisation depends on the SROs perception of the capability and expertise of the individuals within the IPA to whom they have to give an account.

> *There's an expectation within the department, as if my credibility and success is in some way held to account by the IPA, in terms of assurance mechanisms. I guess there is a debate about whether it is personal accountability or if the IPA view it as more of a departmental thing, and I don't think that's clear, but I guess from my own personal perspective, I do feel that I am responsible for the programme being in great shape, and I do take that very seriously, and I do think I've got a good relationship with the IPA to kind of make sure that that happens.* [#189]

Other Cabinet Office organisations were described as *dependent* and sometimes *detached*. During the course of the fieldwork, from 2016 to 2019, the IPA was becoming more established and its expertise was recognised by SROs to be improving. As the capability developed, and their experience of GMPP issues expanded, the forum was increasingly seen as trying to move from *dangerous* to *definitive*. The allocation of the forum to a category was nonetheless dependent on the SRO's perspective of the individuals from the IPA with whom they were directly involved. Most SROs placed it in the *dangerous* category. SROs expected a regular series of account-holding moments with the IPA over their time in post and recognised

the IPA ambition to improve delivery and implementation. Most of this is dealt with through the mechanism of routine reporting and regular formal reviews.

> *The IPA returns are quarterly but they're just reporting. The assurance reviews can happen 2 to 3 times a year. We get assurance reviews from the IPA, and we get interest from various different factions of the Cabinet office, by virtue of our status as a challenged programme, that means that we are on their watchlist.* [#190]

> *I think that's where the roles of people like the senior IPA figures are essential because although they're not accountable for the projects, they can help create the environment where better accountability is understood, better delivery is understood, and the perils of delivery are understood, and the operating environments can be simplified.* [#191]

Concerns about the capability of IPA audit and review teams led some to regard it as a *dangerous* forum because it lacked the expertise to be effective. As a result, some doubted the impact of IPA oversight. When describing other elements of the Cabinet Office, most SROs did not feel they were capable of moving into the *definitive* domain.   The ability of the individual officials representing those forums clearly has an impact on their categorisation.

> *You may have heard they were the absolute terrible twins of the Cabinet Office: The Crown Commercial Service and GDS, and they caused a swathe of mayhem through programmes. So, I try to keep GDS away if I can possibly do so.* [#192]

> *I do see some of these people who hold me accountable don't have the expertise. There have been some IPA reviews where that has been the case especially when they include representatives from the GDS, … you sometimes feel slightly frustrated that they are trying to pour what you do into their own understanding rather than being open to a different way of working.* [#193]

> *With the IPA, it seems to depend who you get. I know there is some pushing and shoving around who is on the panel and occasionally people are rejected, however it still feels to me more about protection rather than revelation.* [#194]

They can be helpful, I spent some time in the Cabinet Office this morning talking about the programme of reviews for next year, and there is a sense that they are well-meaning but again you get people without the right situational awareness trying to review the wrong things at the wrong time. [#195]

The routine accountability mechanisms of returns and reports to the IPA takes up much of the activity of the senior managers within the project and some of this extends to the SRO. Project teams are also continually feeding reports and data to various parts of the department and wider government answering requests for information. Responding to these routine mechanisms does not carry the sense of personal accountability compared with being face to face with representatives of the forums.

You think that something like the IPA, and the rhetoric behind this all-singing all-dancing delivery machine means it's going to be the best of the civil service, and you barely hear from them. So apart from a box ticking exercise when they send round the major projects report every quarter, which is a predetermined spreadsheet, I don't have much chance to talk about things. It doesn't feel like being held to account. [#196]

To call it being accountable to a 'box ticker' is a bit unkind but then you hardly see them most of the time, although you still send them reports. It doesn't feel like accountability to me. [#197]

The review depends upon the quality of the people on the review team and the information you give them … Some SROs are more open-minded than others in terms of the recommendations and what they will accept and not accept. I have seen too many IPA reviews where the recommendations are pretty puerile… I know a lot of time has been wasted servicing them … it is patchy. [#198]

The Treasury

The Treasury is another *discretionary* forum that can move quickly to *definitive*. The funding for major projects requires regular Treasury approval and is monitored closely. The Treasury is

still perceived to use hard levers of governance; 'the power of the purse' described by Rhodes (2011, 30). The accountability mechanism of Treasury oversight works directly from SRO to representatives in the Treasury, and also through the departmental permanent secretary as accounting officer. Routine engagement with the Treasury includes briefings, paper submissions and reports, and their participation at programme boards.

> *With the scale of the programme we've got we've also got accountabilities through to Treasury and Cabinet Office, in relation to our spend.* [#199]

> *Treasury see all our programme board papers, ... we have regular meetings with our Treasury contact to make sure they're sighted.* [#200]

> *We work with whatever assurance we need from an external perspective, you know, NAO, IPA Cabinet office approvals, and Treasury.* [#201]

> *I feel I have an accountability to the taxpayer and the departmental system that I'm responsible for, and to central government acting through the Cabinet Office and Treasury.* [#202]

The Treasury accountability relationship can be intense when projects are under public or political scrutiny. To avoid an unexpected call, SROs felt it was essential to keep the Treasury briefed. This often took the form of including their representatives on the programme board. A distinction was drawn between the low-level accountability mechanisms such as weekly finance reports, and the less frequent and more demanding request to meet with a senior Treasury official and give an account. It is the latter activity which absorbs the management effort of the SRO. The routine provision of data and reports represent a large effort for project teams but can usually be undertaken without the specific engagement of the SRO. Despite not being personally involved, they were aware of the work involved. As with the other forums, a challenge when dealing with the Treasury was that their views and expectations were often not aligned with other forums. In particular there was a feeling that the Cabinet Office and Treasury were not only distinctly separate parts of central government, but both had quite different perspectives on what the programme should be delivering.

The Treasury are interested in their view of the world, and Cabinet office guys have a particular view of the world, that doesn't largely impinge on the Treasury view, and the department has its own view as well about what it's trying to achieve. [#203]

I also found that there are a number of external agencies, Cabinet office, GDS, Treasury, who need to be brought in, and cajoled and feel the love, etcetera, but often do not have the same strategic view that you do, in fact will often have a view that is quite different from yours, and that's not always about not spending money but it might be about spending more money but in different ways. [#204]

The Treasury was usually described as *discretionary* but for those SROs engaged with them at the time of the interviews, they were felt to be *definitive*.

I would actually see the Treasury, where I have good relations, in 'definitive', and the Cabinet office I see as 'dangerous'. The thing I like about the Treasury is they are a functioning bureaucracy, they take a while to make up their mind and stuff, but if they do, they make sure they've got cover up the line and when somebody says yes or no they aren't going to be overruled by their boss or their bosses boss, whereas the Cabinet office is a complete anarchy and they have absolutely no idea… you have actually no idea where they are coming from. [#205]

Where an SRO had experienced a less competent face of the Treasury, they were sometimes considered to lack the necessary expertise or interest in the project and therefore a few described them in the *dangerous* category.

I've had to go in front of the Treasury approvals board and I have found them totally frustrating because it is absolutely clear from the ones I've been to, that those people have no understanding of project management, have no understanding of the position that you're in, and it's almost as if they're working from some scripted questions. So that doesn't feel particularly good. [#206]

5.4 Other forums

The forums described above represent the most salient to the SROs. They also identified a wide variety of relationships with other individuals and organisations which they experienced as being held to account. These are covered in three groups. The first is a range of organisations within the department and across government. None was regarded as being a permanent *definitive* forum, but many had the capability to become *definitive* in certain circumstances. The second group are described as 'the watch list', after a comment by an SRO. These are forums which have few attributes, but which could become more salient in certain circumstances, so needed 'watching'. The final group are those described as *deemed* forums. With these, there is no formal accountability relationship, but the SRO felt that they behaved as if they were accountable to them. The categorization of these 'other forums' is shown at figure 5.4.

Figure 5.4 Typology: Other forums
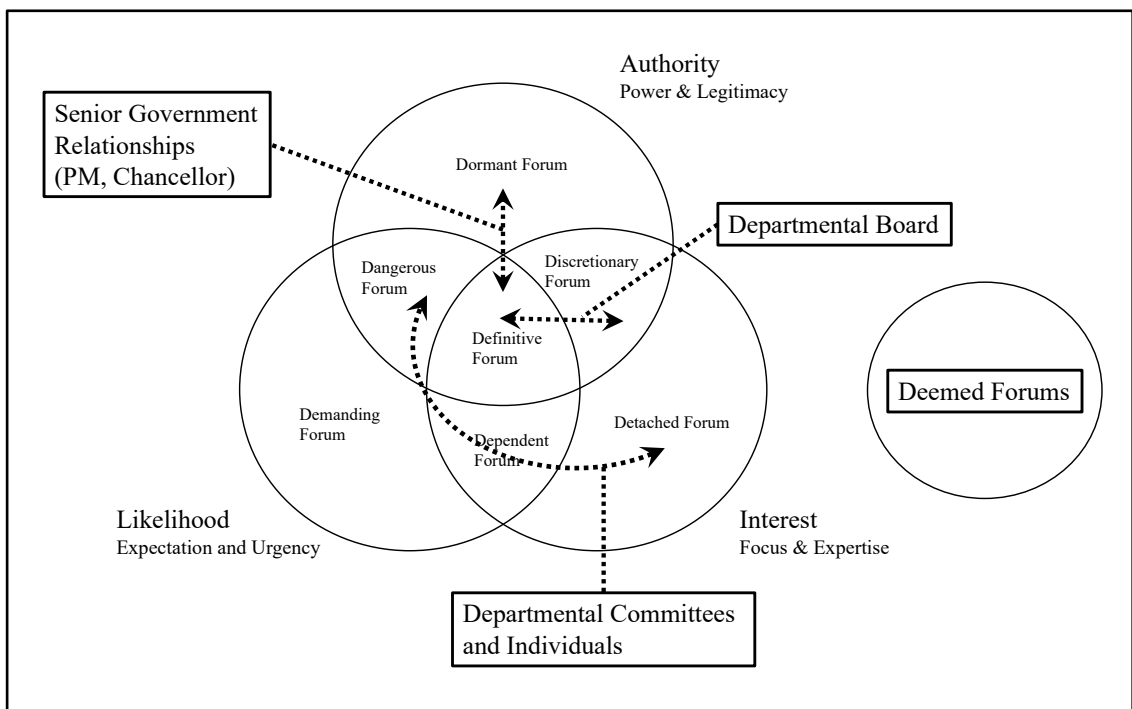
Note: Dotted lines indicate SROs perspective of forum location within the typology

Forums across the Department and Government

Departments have a variety of committees and panels, and the titles and remits vary between the various ministries.   Within a department is an executive committee, which comprises the permanent secretary and his immediate management team of DGs and is often called the Departmental Board.[58] SROs were regularly held to account here, and many were members of the committee themselves. It was described in terms of being a *discretionary* forum that became *definitive* when the programme was in difficulty or when it became high profile within the department, often as a result of media or political attention.

The permanent secretary chairs the Departmental Board meetings, so they can easily become an accountability moment for an SRO. In the SRO's own department, in addition to the executive board, the following were frequently described as account holders, within the *dangerous, dependent* or *detached* categories.

- Operational DGs

- Departmental Finance Director

- Departmental Commercial Lead, or Commercial Assurance Group

- Internal Audit

- Strategy or Policy Administration Group

- Departmental Technology Directorate - or similar function.

- Departmental Investment Board - or similar function.

This diverse range of organisations and individuals creates a bewildering array of account holding relationships.

> *All these different claimants I have to deal with. Let me see if I can articulate them, just the levels that I'm dealing with now, ...two levels of IT, our Star chamber, the Commercial Group, the Investment Advisory Group, the two Operational DGs, I know I've missed something out, I can't remember them all. And they're not articulated*

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[58] I was regularly informed by participants that departments seem to take a perverse pleasure in ensuring that their internal committees were named differently to those in other departments.

either, it's not a hierarchy but all separate groups that you have to deal with. You don't start here and then end up somewhere obvious. The IT folks are only interested in talking to you about IT, the commercial group only want you to talk about their commercial bits, the investment committee only expect you to answer about funding. They all expect you to deal with them in their different processes and look at the same project with different descriptions. You have to become an accountability linguist really. [#207]

Investment Boards or Technology Boards are used within departments to control specific types of expenditure. These were described as *dependent* forums as they had expertise in their own field and could be expected to want to hold a programme to account for certain expenditure, or standards, but lacked the authority to call a senior colleague to account. The SROs perceived many of their colleagues in the executive team to be in the *dangerous* category as they were sometimes seen to lack an understanding of projects.

Every profession tends to have its gilded youths… and the equivalent within the civil service seems to be the policy people. And they seem to rise inexorably to the top. But they don't really have the understanding of delivery, or their experience is on a very limited basis. I would be surprised if they did have a real understanding of programmes, they're much more engaged with ministers on policy, or Cabinet Office, in their detailed analysis of legislation. I don't know of anybody, and we had quite a few come in and out of in our exec team, I can't think of any in our executive team that have got that hard delivery experience. [#208]

The 'Watch List'

When a forum possesses only one of the relevant attributes it is less likely to feature in the accountability agenda of a busy SRO. The term 'watch list' was used by one SRO to describe their experience and encapsulates the nature of these forums.

> *I would describe these ones as being on a 'watch list'. The department has 'watch lists', so people would know what I mean. We don't deal with these forums very often, but if we sense they are around we need to be able to react. They don't really need anything from us till we stumble over them and then we can either throw them out or invite them in.* [#209]

These forums fall within *dormant, detached,* and *demanding* types, and were referenced by less than one third of the SROs. The devolved assemblies, industry bodies, and some other SROs fell within this group. For most of the organisations in these categories the SRO could assume they would not call for an account, and that if they did, they could be fended off. This was not the case with all of them. For *dormant* forums, their authority enables them to call for an account whenever they want to do so. Whilst it may not be expected, having a low likelihood, and they may have little particular expertise about the project, their authority is enough to get the attention of an urgent or unexpected request. A GMPP project can sometimes reach the agenda of the prime minister or chancellor. These are unusual occasions and as account holders they were regarded as *dormant* but when an SRO gets the call from a *dormant* but extremely authoritative forum it becomes the main focus of their environment.

> *I was involved in one project when it went disastrously wrong, and it went as wrong as everything could ever do, and I can remember we had to write a slide pack to be sent in response to an urgent request from Number 10 as they needed to know where we were, and we had never heard from them before but we were spending inordinate amounts of energy writing this slide pack for Number 10 whilst our numbers just went through the floor and of course all the senior management energy went into this presentation rather than into how the hell are we going to solve this.* [#210]

An alternative approach is to ensure that there is suitable social capital, described by Coleman (1988, S95), which has been created between the SRO and the staff of these critical forums so that when a *dormant* forum becomes *definitive* the response can be effective.

I have heavily invested in my relationships with the Treasury, and Number 10, so that

when I have to pull the lever here the people there are invested enough to do my talking

or if necessary would let me to come and do my talking with the teams supporting the

chancellor and the prime minister. [#211]

Detached forums are felt to be easy to deal with. This category will include industry

bodies and regulators, as well as commercial companies involved with the project, if they are

not already represented at the programme board. They can be fended off unless they get access

to authority. *Demanding* forums are less easily managed as they can consume time and

resource but without authority, they are also capable of being fended away. SROs described

some specific individuals or institutions within this category.

There is this one individual who seems to write every week demanding that I explain to

him what we are doing, why and for how much longer. He insists that as a member of

the public I am accountable to him and fires off the odd missive to his MP. He hasn't a

clue what the project is really about, but we are always polite and respond. [#212]

Some demanding forums, such as organisations from devolved assemblies or cross government

user groups, are invited onto the programme board. This doesn't reflect their salience but

reduces the transaction costs of dealing with them. For many SROs their programme board

serves the function of a *transaction cost reduction mechanism*, helping them deal with multiple

forums, and this is described further in chapter 6.

Deemed Forums

The preceding sections describe forums that are usually situated within the operating

environment of the projects. During the interviews the SROs referred to other entities, but these

were often less obvious as account-holding forums. These are described as *virtual forums* by

Bovens (2007b, 184) who identifies the general public as falling into this category. I have

termed these 'deemed forums', as they were those considered relevant by the SROs rather than

an external observer. They rarely exhibited formal account-holding capability and would not

necessarily be recognised as an obvious principal or forum. But on the other hand, SROs described acting as if they were accountable to them. They fall into two categories. The first covers the end-users of services, the public generally, and the team working within the project.[59] The second were the members of the project management profession within government and other GMPP SROs.

The end users of GMPP projects have a hidden influence. GMPP projects are generally not immediately accessible to the public. The public, as user or voter, can influence projects through their political representation but few projects had any direct connection to the public. Even those which interact with the public as the eventual user have limited scope for the public to demand that the SRO is accountable to them, other than through their elected representatives. Despite this separation, almost one third of the SROs felt that they regarded the public, as taxpayer or user, as a 'group' they felt some form of accountability towards. This links to the sense of public service ethos described by Carr (1999) and Heywood (2012).

> *I suppose I am accountable to the public although I feel that in the department you're one or two steps away from that. Your reputation isn't exactly that direct, in that you've got the politicians up the chain of command.* [#213]

> *Ultimately it feels like I'm held to account in the court of public opinion, so I know I can't hide anywhere for the quality of the decisions I make.* [#214]

> *I'm accountable to the taxpayer, which is more of a moral and ethical accountability really.* [#215]

> *But I feel, whether you call it accountability or something else, almost, I feel I have an accountability to the taxpayer.* [#216]

Some didn't see the public as a forum but saw their project's use of public money as leading to the public as relevant with a potential consequence if they were seen to fail.

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[59] SROs distinguished between users within the department such as other DGs or their implementation and delivery units, and the end-users of services such as the public as benefit claimants or transport users, or service personnel in the case of defence procurement. In this case it is the end-user which is relevant.

I don't personally feel accountable to the citizens, I guess you could use the argument and extend it and say that its public money and you're accountable to the taxpayer, that's one dimension I guess, and they could complain to their MP, but I doubt if most know what we are doing on their behalf really. [#217]

I deliver a service to the public so I feel I've made a promise to them and that should be of service delivered and that if I don't then they should be able to hold me to account. I mean they can't hold me to account by docking my salary or anything, but they can raise complaints through our customer survey, and that sort of thing helps to keep us held to account and deliver a good service. [#218]

The team working within the project was another group that had an emotional account-holding feeling for some SROs.

I have about a hundred working in the team and I feel accountable to them. And I feel, the thing that does wake me up in the morning, sweating, not comfortable, is the lack of effective stewardship that I am able to deliver to them. [#219]

I think on a very personal level, I felt a sense of accountability to the people who work for me actually, I felt strongly that my predecessors had not always treated them well and that I, in many cases, had persuaded people to join, you know I had to move a lot of people on so when I've recruited people I do feel a bit of accountability to them. [#220]

Sometimes I feel accountable to some of my colleagues, and some of the people who work for me. Some of the people who have also committed themselves to this project. I feel an accountability and a collegiate responsibility to them. [#221]

Many SROs experienced a strong sense of personal accountability, frequently described as 'the ethos of being a public servant'. This was frequently linked to their perception of being part of the 'public project management' profession. In this context, they describe their accountability to their professional peers as relevant. This is linked to their sense of identity and played a part in their description of motivation and how they perceive their overall

accountability for outcomes. A quarter of participants felt that they behaved as if they were accountable to their colleagues for running a successful project.

> *From a personal perspective I actually really am quite passionate about the profession and wouldn't want to let them down by not doing well here.* [#222]

> *What we are trying to move to is a more functional model so that we can influence the requirements for what kind of skills and capabilities these people have, so rather than it be just SCS it will be an SCS PPM professional post and you are joining the profession when you join the function of project or programme director. We have to be seen to do a great job to expand this credibility.* [#223]

This led some to describe feeling accountable to those in the profession for ensuring that they were seen to be doing a good job as a project professional.

> *I feel a sense of accountability to the profession.* [#224]

> *I think the profession in government is still quite immature, so I think the profession is still finding its feet. For me personally I think there is a fair bit of professional pride, and I want the profession to succeed in government, and I want to help to build that success. I'm accountable to the next generation for doing this job properly so they have examples to follow.* [#225]

For some this was recognition that only those who have been in these heavily scrutinised major project leadership roles can understand what it it's like, and that they see their peers as holding them to account for maintaining the credibility of their profession.

Conclusion

The forums that try to hold the SRO to account are not all equally salient. Using the typology developed in chapter 4, the forums identified by the SROs can be categorised in terms of the attributes assigned to each of them. SROs perceive the most salient to be the permanent secretary and programme board as *definitive* forums. Ministers are salient but frequently considered in the *dormant* or *dangerous* category as they are not expected to demand an account

very often, or they lack the personal capability to be able to interrogate effectively.

Consequently, most accounting to ministers was via a permanent secretary.

A second group were forums which had two of the attributes and the IPA, Treasury, the

NAO, and parliamentary committees were usually within this category. SROs recognise that it

is often easy for these forums to move into the *definitive* category and they consequently have to

be managed carefully. Those forums in the remaining categories require less routine

management. Those on the 'watch list' have little influence on the SRO and how they feel

about their accountability. However, a group was identified which possess none of the

attributes of 'salience', but which SROs feel have an impact on their behaviour. These deemed

forums include their peer group of SROs within the new project profession, as well as the public

and end users of the services or products they are creating.

Exploring the nature of each accountability forum provides a rich picture of the breadth

of account holding relationships. Using the attributes and the typology facilitates this

assessment for both researcher and participant. The environment is too complex and dynamic to

create a definitive list of forums in some order of priority. However, it is possible to understand

the prioritisation process, identifying which are the most salient and therefore need managing,

compared to less important forums that can be fended off or dealt with routinely. The forum

schematic enabled SROs to move from categorisation to explain how they managed the

different forums or tried to manipulate their movement between categories. How they managed

the multiple relationships with all of these forums is covered in chapter 6.

Chapter 6. Managing Multiplicity

I sometimes use the analogy of an SRO being one of these fish that lives in brackish waters mixing saltwater and freshwater. That's exactly the sort of space you operate in, and if you came into the SRO role from the programme delivery side you have to learn a whole new world of ambiguity which is quite painful, whereas if you come originally from policy or strategy roles, you understand craziness and ambiguity, but it's really hard understanding the cold logic in the disciplines of the programme world and understanding where they're coming from, so you need to bridge those two. [#226]

Interpreting and managing the expectations from diverse forums is the core role of the SRO. Across the department there are many individuals who have an interest in the project, if only to ensure it doesn't cause them a problem or embarrassment to the department or the minister. The officials in the private offices of ministers and the permanent secretary, which Rhodes (2011, 137) described as the 'departmental court', will be aware of the project and watchful. The policy staffs will be keen to make sure it delivers what they may have promised the minister. Operational DGs will be alert to the impact the project may have on their *business as usual*, particularly if they are going to depend on it for their own success. All over Whitehall and beyond there will be individuals looking for things from the SRO: information, updates, favours, direction, feedback, oversight, and even silence.

If a problem gets to the private office, then I get hauled in to explain how I could possibly let this happen. As if I had done it deliberately to ruin the ministers' weekend. Sometimes you just pray for the screens to be really quiet on a Friday. [#227]

Having identified which forums are their priority, the SRO must make some decisions about how to manage the competing expectations of all the forums that they face. Whatever the wording in their letter of appointment, and the descriptions of benefits, resources and timescales that it may ascribe to the project, they still face the full range of forums described in chapter 5. Balancing the expectations of their forums, in whatever way they can, they must provide direction for the project, and clarity for the project director. I cover their approach within four sections. First I argue that they manage multiplicity by adopting one or more of four strategies to manage the forums. Having multiple account holders can have advantages for the SRO and next I consider how some of the mechanisms they face arise from cooperation between forums. Almost all the SROs identified their programme board as a particularly salient forum and also where much of their forum management takes place. To illustrate how SROs use the management strategies I examine how this board is used to enable the SRO to cope with their multiple forums. Finally, I address the way SROs described how their experience in the role, and in the civil service, facilitates their approach to managing multiplicity.

6.1 Four strategies for coping with multiple accountabilities

For the SRO to cope with the complexity of their multiple accountability relationships, I argue that they adopt a strategic approach to their management. The metaphor of the 'impossible job' and the sense of *coping* within major projects was described in chapter 3. I refer here to the SROs' management strategies as *coping* because that was the way in which SROs described them. Arising from the fieldwork I propose four strategies used by SROs to cope with forums. The first of these is to take a passive stance and react to requests for an account as they arise. The second is to respond by bringing multiple forums together to get clarification and agreement on their requirements. The third proposal is for the SROs to undertake their own prioritisation, based upon their evaluation of the salience of the forums. The fourth is to offload some accountability onto other executives. The data suggests that the two approaches favoured by SROs are to use their view of forum salience and make their own decisions on how to prioritise some forums over others, or to bring forums together to get agreement. The frequency

with which each approach was evident in the interviews is shown at Table 6.1. The SROs either described how they made their decision, or it was obvious from the context. The table shows the number of interviews in which each approach was described. Some chose one approach, while others use two or more, depending on the state of project and the complexity of relationships. There is significant support for two propositions: consensus and prioritisation. There is limited support for the proposals that they take a passive approach or that they offload some of their accountability to others.

Table 6.1 Frequency of management approach adopted by SROs

Approach	Description	Interviews (times – percentage)	
Accept	Accepting demands as they arise	7	15%
Consensus	Bring forums together to get clarity	33	70%
Prioritise	Prioritise based on personal evaluation	28	60%
Offload	Pass some accountability to others	7	15%

Source: Interviews with 47 SROs. 'Interviews' shows the number of interviews in which a particular approach was referenced, and percentage shows the proportion of the 47 SROs using this approach. The total exceeds 100% as more than one approach can be referenced within any interview.

Some similar approaches for dealing with multiple forums have been described by Schillemans (2015, 438), examining how public managers in the Netherlands explained their strategies for coping with multiple accountabilities. He lists prioritisation, combining reporting requirements, 'developing a rich information refinery', and assuming a proactive stance to communication. The SROs approach is comparable, and within their project organisations there are numerous staff to create and communicate vast amounts of data to account holders. Several described the challenge of *feeding the machine* with reports and data. Like Schillemans respondents (p. 437), the SROs expressed their frustration at the extent of their accountability pressures but perceived this level of activity as the norm within their roles. Even when taking a strong direction from one forum, such as the permanent secretary, the other forums' demands

need to be managed. The SRO who ignored those might expect to see them bypass the SRO and move their demands down to the project director, or up to the permanent secretary. The comments from the SROs indicate that while they have teams to manage regular communication, feeding the machine from their 'information refinery', their personal interaction with forums is designed to limit their personal engagement to manageable proportions.

Accepting accountability demands as they arise

The first approach considered is adopting a passive stance and responding to each request for an account, as it is made, by whichever forum. This is, in effect, a sequential response to accountability demands. It accepts that there is confusion within the environment and that there will be different opinions between the forums. No distinction is necessarily drawn between competing forums and the SRO can try and address them all or just respond as well as they can to the various demands. Some referred to it as managed chaos and accepted it was sub-optimal but recognised it was almost beyond their limited capacity (usually because of time constraints) to do much more.

> *The fact that we are working in a particularly difficult environment at the moment is something that I accept and that goes with the role that I have. I am not just accountable for these programs but I am one of the senior leaders in the Department and I think it's terribly important that I remain calm and accept that we need to manage all of these difficult things are going on at the moment because I have a lot of people who are looking to me for that leadership. There are times when I have to say that my head is buzzing, but I am very clear in my own head as to what are my top 5 to 10 accountabilities are today, and those top 5 to 10 might change tomorrow and the next day because it's a dynamic environment, but I focus on those as they arise. Now I might have 50 priorities, but I focus my personal attention on the top 5 to 10 accountabilities at that time and in that way, I know that I am keeping track of the things that are particularly urgent and important right now.* [#228]

The SRO quoted above may have had a sense that they were prioritising from within a wide group of forums (they didn't actually itemise 50 forums but felt they had at least that many requirements from those that they had already listed). However, it was clear within the discussion that those priorities kept changing and were related more to a salience assessed in the moment, rather than strategically for the project.

This form of management appeared in 7 of the interviews as a strategy adopted, although not necessarily all the time. The *coping by accepting demands* approach responds to the latest or loudest shout at the time. This is not just about responding to a call from the permanent secretary, a minister, or other significantly salient forum such as the NAO, as that is always likely to trump all other forums. Coping with demands in this way represents a limited strategic approach to accountability management. SROs described being called to various meetings in the department to explain things, having to complete reports or briefing notes to various parts of government, or spending time responding to emails, in what they described as a never-ending flow of accountability requests. Some even admitted, almost apologetically (evidenced from my notes made at the time) that they had no effective strategy to deal with the demand other than respond at the time. This approach was adopted more frequently by those officials who regarded the SRO aspect as a minor part of their job. It was also regarded as likely to be the approach adopted when a project was having unforeseen problems, particularly if it might receive media attention.

> *If we get into difficulty my feet don't touch the ground and my PD and I can be running about all over the place trying to explain what is happening to bits of government here, there, and everywhere. All the carefully laid plans for routine briefings and reports go out of the window. With a project like ours it doesn't take a lot to put the wind up some people and start the avalanche!* [#229]

Getting forums to agree and clarify their requirements

The second strategy an SRO can adopt is to search for clarification by bringing forums together. This appeared in 33 of the interviews. Recognising that there is conflict between the

expectations of different forums, the SRO creates moments where the forums themselves are forced to confront this confusion and agree a consensus. These clarifying events are often routine meetings, but others can take up a lot of SRO activity.

It's like shuttle diplomacy around the building. Even worse if you've got external account holders, because you can be running around all over the country taking a long time. [#230]

So, I sometimes one-to-one and sometimes bring everyone together. Often, we just have regular joint group meetings anyway, but when I need some special sort of direction, we perhaps get it by calling for clarification. [#231]

In this project I am looking at a number of relationships where they don't actually agree and it's been quite difficult but I managed to get to a point where by speaking to lots of people, and understanding the motivations of them, I succeeded in getting a collective agreement, and getting them to accept the limitations on their control. [#232]

Because my programs have this enormous number of users across all sorts of organisations, there's no one part of the business that has any more than a share of the ultimate outcome, so the SRO responsibility have been brought together in myself, ...so I'm very conscious that I'm representing their interests, and I have to work with them to make sense of what their priorities are. [#233]

I've realised over the years that you can't just focus on that one bit, so I've morphed into an integrator who tries to integrate my accountability to the three or four teams within the Department for the various bits and pieces, so that's through the programme board and the working groups and the workshops which I chair, I bring all of those parties together and I try my best to deliver a whole integrated service. [#234]

I use my programme board to force the forums on the diagram to agree what they want me to do and explain how I will be measured against that. [#235]

Using different committees or panels to bring forums together is a widespread practice. The most frequently used was the programme board. This was an important element in the SROs management of forum conflict. As well as formal and regular meetings of the programme board, quite often the SRO gets two forums together and uses that meeting to get agreement and provide clarity. They described these meetings as much more effective than extensive exchanges of emails. Whilst the programme board was perceived to be the most effective accountability institution if significant clarification and agreement was required, there were many examples of smaller scale attempts to get forums to agree amongst themselves. These forums could sometimes be very senior. If a project is high on the government's media priorities it can require some less frequent forums to be brought together:

> *So I'm giving people early sight of it, and the decisions that I'm reaching with ministers through informal discussions. I then follow up with a paper trail that says we spoke, and just to be sure, I use letters that go into the government machine, so letters to the department, letters to the chancellor, letters to the prime minister, letters to the Cabinet Office, normally copied to all four, as a way of saying here's where you agree or here are the issues I now face and you need to make choices so there is lots of chat and stuff going on and I'm always trying to make sure there's a trail after it to show they all agreed at some point.* [#236]

Sometimes the SRO cannot get that clarity from forum agreement, or feels that they know best what is needed, and then they undertake their own prioritisation.

The SRO determines the priority

The third approach to managing the forums is prioritisation by the SRO. This was evident in 28 of the interviews. The official decides which are the most salient forums and relationships to which they need to respond. They then structure their management of the project, and the accountability regime they work within, to reflect these priorities. For some, their prioritisation even takes precedence over the outcomes from the programme board.

> *The programme board is the forum where I could prioritise all of these things, and my understanding of my own responsibilities is some people take this slightly differently and talk about full members and voting members. My view of the programme board is it's only there to provide the SRO with advice. It's a place where you take soundings and look for advice but ultimately you can't hide behind the programme board.* [#237]

> *I decide what I think is the ranking of what they all want and then crack on. I sometimes let them know. You don't always get agreement from the IPA and the department and Treasury but then I have to decide what is best for the programme. After all its why they have an SRO.* [#238]

Most SROs were not so explicit, but adopting a personal prioritisation strategy, and based on their own evaluation, the SRO takes decisions about what the project needs. The salience of the forums described in chapter 5 has an impact on the priority given to the relationships. The expectations of a definitive forum such as a permanent secretary will be given priority. A ministerial request would become prioritised if it was urgent, as that *dormant* forum moved into the *dangerous* or *definitive* category. Similarly, when the NAO or PAC, as *discretionary* or *dangerous* forums, require action they will be prioritised over others less salient, and this will be covered further in chapter 7.

Where prioritisation is based on a more nuanced personal perception of salience is in relation to various parts of the Cabinet Office or Treasury, and the other units within a department. These are usually *detached*, *dependent* and *discretionary* forums. The *demanding* forum, with no authority or interest is given a low priority. The prioritisation process was rarely undertaken formally, although several officials had lists of accountability mechanisms that they were able to show had a form of grading of salience, and allocation of time or resource. However, from the SROs commentary it is evident that their routine intuitive ranking of account holding mechanisms or forums assists them in allocating their limited time and resource to managing the most salient.

> *Ultimately I'm prioritising based on my own views. I like to get to get some advice but it's my decisions, my delegated budget, and potentially they will never agree unless you escalate it and in many of these agencies they don't come together anywhere until you reach the permanent secretary, so if you want to take all those things to the perm sec you could, but that hasn't happened.* [#239]

> *There is something here about seeing through the stakeholder relationships to the heart of where the accountability really is, and there is a virtuous circle here that the more clear you are about where your accountability really rests, the more confidence you have in your ability to deliver, so you're able to treat the other stakeholders who are coming in claiming a degree of accountability, you are able to treat them in the right way, and keep them onside, without the feeling that you've got to bend your programme to meet their wishes.* [#240]

> *I do a lot of talking to people. I've got a good network, and I've got people I can trust to say what's going on here, and how do I align with that there, so I have to do a lot outside of formal meetings to just keep bringing things back on track, and know who is thinking what in different parts of the organisation so I can try and channel my energies to keep people focused, whilst we may have somebody here interested in the money, some here interested in IT and somebody interested in people, ultimately it's all being brought together by me.* [#241]

The combination of prioritisation and bringing forum together are not necessarily independent activities and some described using both approaches. Whilst a frequent frustration was trying to get reporting processes and data management coordinated, like Schillemans' public managers (2015, 438), this prioritisation and combining is about getting the forums to agree on their overall expectations of the project, as much as for their routine requests for explanations.

Offloading accountability to others

The fourth strategy is to offload some of the accountability. This was identified in 7 of the interviews. Some SROs identified aspects of their project where they had limited expertise or

experience, either themselves or within their immediate project team. This can be dealt with by allocating specific tasks covering this aspect to other teams or individuals outside the project, under some formal management arrangements. In a few cases SROs recognised that in the process of getting their colleagues involved, they had also passed on some of their account-giving liability to these other teams or individuals. They saw this as separate from delegation, where they retained accountability for the task. They described this aspect of devolving the task as accompanied by a sense of offloading some of their accountability to others.

> *I am delivering a heavily IT-based project and I am not an IT specialist, so I effectively outsource, not literally, nominally outsource that work and development and test and delivery of the IT element of my projects and programmes to one of my peers inside this department. They are an IT specialist, so I have devolved some of my accountability to them, so I'm now saying I need you to build this product by this date, so they are accountable to me to make sure that that is done, but I don't have direct authority or line management authority over them which is why I am effectively setting up a contractual relationship, so here are my clear expectations, but in some respects then of course when it comes to the delivery of a particular product that has to be delivered with IT in it, there is now a dual accountability insomuch as I report to one side of the department and they report to the other side, but we both have to account to the permanent secretary for the same thing.* [#242]

The complexity of GMPP projects creates many situations where they overlap with other projects within departments, which may also be in the GMPP. SROs can find themselves in situations where the outcome of one is required to support the implementation of another. For example, a major revision of IT systems is a project on which many internal change projects may rely. This has created situations where SROs felt that it would be difficult for them to be held accountable as the boundary issues enabled them to offload their personal accountability onto these other project leaders.

> *You cannot deliver the public good, in this case, without dealing with those procuring*
>
> *infrastructure and those planning to operate it. So sometimes the Perm Sec or minister*
>
> *will think that one SRO is responsible as the SRO for all enhancements but clearly, they*
>
> *are only responsible for the infrastructure and everything else could go wrong, and the*
>
> *service will not be delivered. So, the Department really hasn't got to grips with that*
>
> *aspect in my mind.* [#243]

The problem of shared accountability is then similar to that described by Thompson (1980, 905) as the 'problem of many hands'. This situation was rarely discussed as an intention to avoid being accountable. Sometimes the structure of projects within departments left them feeling they were able to offload specific aspects of their accountability, and therefore recognised that things '*fell down the boundary cracks between accountable individuals.*' [#244] Whilst not intentional offloading, this was an area where the SRO was aware that accountability could not attach itself to them, or there would be no realistic expectation of sanctions against them should they be held to account.

6.2 How multiple forums manage one agent

Dealing with multiple principals is clearly something that all SROs have to manage and a few recognised that having so many did provide some benefit to their project. It would be misleading to think that there are no benefits to the project, and for the SRO, to have an extensive range of forums whose interests and values can be considered. Multiple accountability should not always be regarded as a bad thing nor necessarily as an overload. For the department, or government as a whole, having a wide variety of interested parties with oversight of different aspects of the project may be beneficial.

The benefits of forum redundancy

Some SROs see benefit in having a range of forums. Landau (1969, 356) addressed the concept of redundancy in large public organisations and saw duplication and overlap as a means of providing safety factors, organisational flexibility and creative potential. On the other hand, he

also recognised the need for an organisational structure that had sufficient redundancy to be effective but not so much that it became inefficient. Managing an organisation with such redundancy is a challenge.

> *It can be a pain, but it is useful to have them all at the board as they all want me to answer different questions and it means I don't lose track of what's important to different bits of the department.* [#245]

> *There is a real sense of a broad range of people supporting the project at the board. They are asking really probing but relevant questions about what we are doing and why, so I get the point of having them all there for their different points of view, but it's how you minimise that to the stage where it becomes manageable. I could spend all day, every day, in a programme board if I didn't stop them.* [#246]

There are other benefits and Schillemans and Bovens (2015, 17) describe a number of advantages in having redundancy in the accountability environment. First, it mitigates the informational asymmetry between the SRO and forums. The archetypal problem in the principal-agent relationship is alleviated if there are multiple and independently focused principals. Whilst the transaction costs for the SRO are increased, those for an individual forum are not as onerous as for one all-encompassing account holder. The programme board brings together this wider grouping that can provide a much more effective forum than one permanent secretary or minister. Second, it enables the different values, which may exist in different areas of policy, to be embodied within the accountability system. The forums require management, but they can all be represented, rather than one forum with particular interests dominating the project. A third benefit is that it is essentially a pragmatic solution to the SRO's inability to limit their oversight to specific topics. It may be a management problem but does encourage them to take a more holistic view of what could otherwise become a very narrow focus.

Nor is it only the department that might benefit from multiple forums. Some SROs are comfortable with many account holders. The problem of many eyes (Bovens 2007b) gives the SRO a shield when blame for project failure may be directed their way. When called to account

it is possible to explain that it wasn't possible to do something for one forum because you were responding to a different expectation from another. If the forums themselves don't have an agreed position, then it gives the SRO some room for manoeuvre in their response. It conflates Bovens' (2007b) many eyes and Thomson's (1980) many hands.

> *I have so much going on, with so many people trying to make me feel accountable, and so many other projects that I rely on in this place, that I would be surprised if anyone could bear to hear the whole explanation, let alone try and see if it was my fault.* [#247]

There is an assumption here that the information asymmetry which affects the relationships between the SRO as agent, and the department as principal is then exploitable by the SRO.[60] This is then compounded by the 'many eyes' problem. On the other hand, the department may actually appreciate a degree of ambiguity in this situation. Departments may value the opportunity to relax their expectations for a project.

> *It's quite useful for the department to remain a little obscure about what exactly they want. It gives them the chance to flex things if they have to, or if the minister hasn't been quite clear about what he wants, which isn't unusual here. The big things are usually reasonably clear but when you get into detail it can be quite hazy.* [#248]

Confirming the deliverables and the benefits to be realised, against strict financial, time, and resource constraints works well in the project environment. It may be less advantageous for those in the departmental court. This ambiguity would make the role of some forums, such as the IPA, a much greater challenge but might not be felt to be disadvantageous to others. Where forums desiring ambiguity meet forums desiring certainty the interface could be particularly challenging for the agent.[61]

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[60] Here I use department as a shorthand for the minister, permanent secretary and any others who were originally involved with defining the project.
[61] This was not specifically explored within this study but conversations with SROs hint that it may exist and discussions with officials in the Cabinet Office indicate it might be an area worthy of future investigation.

Strategies of multiple collaborative forums

When addressing how SROs deal with multiple forums there is some insight available from an examination of how multiple principals achieve coordination when dealing with one agent. Strategies used by multiple forums to manage their agents are described by Voorn, Genugten, and Thiel (2019) who examined organisations involved in joint-service delivery.[62] They describe institutional solutions, based on coordination, delegation to one principal, or centralisation. These were viewed from the perspective of multiple principals attempting to achieve better accountability from an agent, and there are examples from the GMPP environment that show where similar strategies have been used. Informal coordination between forums and sharing governance tasks was one potential option, although principals may have an incentive to withdraw from any informal agreement when it is beneficial to their interests. There was some evidence from the interviews that SROs saw this informal collaboration in the attempts by forums to become members of the programme board.

A second approach was to adopt more formal coordination through written contracts (or agreements) between forums which may provide the agent with clear direction and avoid separate lobbying. Formulating agreed directives is not simple and may limit the autonomy of individual forums. In the GMPP environment this may encourage the SRO to concentrate on contractual requirements to the detriment of wider issues. To remain effective these agreements should be regularly updated and disagreements between forums place the SRO in a strong bargaining position. The Osmotherly letter is evidence of this approach. The Cabinet Office, Treasury, and the department all have to agree on the project objectives that are contained in the document. It is then approved and signed by both the department and the IPA. This should create a contractual link between three salient forums and the SRO. It is not frequently updated, although recent IPA guidance suggests that should be done annually (IPA 2019b, 15). Its existence also gives the SRO significant bargaining power with the appointing forums, as anticipated by Voorn et al. and which will be described further in chapter 7.

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[62] The collaborative provision of public services for multiple stakeholders

A third approach of delegation to one forum, with the others allowing them to manage the accountability of the agent, also has limitations. It enhances the capability of one forum to direct the SRO at the expense of the others, and the SRO could be motivated to respond to the managing forum's expectations more than to address the varied requirements of the others. In the project environment the programme board takes on this role, as a superordinate forum. Principals wishing to hold the SRO to account can use that institution, if they can join it, to provide them with the authority they would otherwise lack. The municipal situation described by Voorn et al. was largely based on principals with equal standing in their environment, but that is not the case with the multiple forums faced by SROs. In the GMPP situation this delegation to one forum may also be perceived in the acceptance by some forums, implicitly or explicitly, that a more salient one, such as the permanent secretary, will act on their behalf. Ministers and DGs may feel no need to act as account holders if they know their broad interests are served by the permanent secretary doing that for them.

Another coordination approach is centralisation. This takes organisations out of the control regime at a low level and coordinates all such organisations at a higher level. Whilst Voorn et al. describe problems within the municipal sector, this approach is evident in the oversight regime of major projects in the GMPP environment. The introduction of the MPA and the GMPP list itself can be viewed as accountability mechanisms which raised project audit and reporting from an internal departmental level to a government or national level. The Osmotherly changes have elevated this still further by placing the PAC hearing as a senior accountability mechanism at a direct parliamentary level.

Any collaboration by forums may impact on their management by an SRO, as they network together themselves either as coordinating entities or as delegating entities. The SRO must therefore take this into account in how they manage groups of forums. The evidence from the interviews is that despite acting together in these ways each forum still had its own agenda, requirements, and salience attributes and that it would be a mistake to assume collaborative activity meant that their approach and their expectations of the SRO were aligned.

> *I've got my appointment letter, the Osmotherly one. You would think that given the IPA,*
>
> *Treasury, and my Perm Sec had to agree its contents before I signed that they would*
>
> *want the same things. As soon as I got it, I realised that they all still want their own*
>
> *things in their own way, but they have now added a fourth thing by that letter.* [#249]

The SROs didn't always feel that coordination was reducing complexity, and some perceived it as complicating things. Some forums appear to collaborate, but these mechanisms may not reduce the complete range of forums and expectations to be managed by the SRO. The creation of the IPA and the collaboration of Treasury and Cabinet Office was generally perceived to be a positive step in creating the joint accountability mechanism, but SROs were alert to the reality that it didn't reduce the independence of the individual organisations acting as accountability forums, and they still face both Treasury and Cabinet Office as separate forums.

Layered accountability

SROs distinguish between their experience of feeling accountable and actually being called to account. They felt accountable to their DG colleagues, or to the departmental finance director, or to a variety of institutions within their wider network but were rarely called to formally account for their projects with these individuals. They recognise the difference between accountability as a process and as an event. Their felt accountability resulted in regular 'social' updates on the programme. It can be thought of as two levels of the Bovens' schematic operating simultaneously, one that is formal and called upon irregularly, and another, which is less formal but is more routine. Romzek, LeRoux, and Blackmar (2012, 444) describe this informal accountability, noting that informal processes, within shared norms, also carry informal consequences including recognition and enhanced reputation. The importance of the informal briefing or corridor chat would be recognisable to Heclo and Wildavsky from their exploration of the Treasury in 1974, or Rhodes watching permanent secretaries in the early 2000s. SROs feel that they need to account for the programme regularly to their colleagues, and so use the light and informal mechanism of regular discussion, and thereby accounting for the programme, as a routine process.

> *We work together so it doesn't feel like a formal thing, but I want to keep the rest of the*
> *board onside and you never know when you will need their help. I just chat to them*
> *about the project when we meet once a week or in the corridor. Thinking about it now,*
> *they are only holding me accountable for things that affect their areas, but it's done in*
> *a low-key way.* [#250]

Bardach and Lesser (1996, 205) report that 'informal and norm-based means of projecting accountability are the most significant methods available to collaborative partners.' When called to account more formally, at specific board meetings, or when there is a problem, SROs find themselves reverting to the more formal mechanism. These two processes feel different to SROs, even though the participants are often the same. This was perceived as a layering of the mechanisms, with informal and formal networks existing alongside each other. Only a few more salient forums, such as the PAC, are not subject to this informal process. Ministers and permanent secretaries are frequent recipients of these informal accountability briefings.

> *I find it helpful to chat to the Perm Sec as often as I can, and the minister or his*
> *advisors, just to keep them onside. It doesn't feel like some big accountability moment,*
> *like when you're summoned to give a presentation on a problem or dragged to the*
> *Treasury to explain something, but I suppose it is really. You think of accountability as*
> *being up in front of Meg* [63] *at the PAC but it's really lots of little conversations with lots*
> *of people who want explanations.* [#251]

SROs were regularly giving an informal account of their actions to forums without feeling the sense of judgement that is represented in most conceptual models of formal accountability. This did not lessen the individual's feeling that they were having to account for their management of the project. If there were problems with the project, then this informal

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[63] Meg Hillier, Chair of the Public Accounts Committee, from June 2015 to December 2019, and reappointed January 2020.

information exchange could quickly move towards being more judgmental and sanctions based. For many SROs most departmental bodies do not have the authority themselves to act in a judgement/sanction mode. They could attempt to move from the *dependent* to *definitive* by recourse to others with that authority. Examples included operational DGs reporting to the permanent secretary about problems with the project, having spoken informally with the SRO, which moved the relevant accountability relationship into the domain of the permanent secretary's *definitive* relationship with the SRO. This situation was reflected in the SROs attitude to most internal forums and they were managed accordingly.

6.3 Using the Programme Board to manage forums

An example of the SRO using both their own prioritisation, and using a meeting to achieve forum coordination, is evident in the programme board. It is felt by almost all SROs to be the most effective institution available to them to help them manage their multiple accountabilities. It is a normal organisation to have within project management but is also a *definitive* accountability forum. It features in the SROs' descriptions of both 'coping by getting agreement' and in 'coping by prioritising'. It is a forum which can hold the SRO to account and is also a significant event for determining the answers to the 'for what', and 'how' accountability questions.

> *I've seen the programme board work very well. I think it potentially can be both a way*
> *of the programme being held to account and the programme using the meeting to get*
> *direction.* [#252]

Reconciling forum expectations at a board.

The government guidance on project delivery suggests that the role of SRO 'should be supported by a programme board which the SRO should chair' (IPA 2018b, 36). The same document defines 'should' as a recommendation rather than a requirement (p. 2). There is considerable variation in scale, composition, remit, and management structure of the different programme boards across the range of GMPP projects. The boards described in the interviews

reflected considerable differences in all aspects of their operation and composition, with no standardisation. It is arguable that this gives the SRO, or the department, the flexibility to manage their projects in the way they feel most appropriate. On the other hand, it could also be argued that lack of a standard approach provides limited guidance to those SROs with less experience.[64]

Various forums, with different combinations of attributes, are brought together as members of the programme board, on a regular basis. The SRO can give a general account to them all or can take specific questions. They can also request forums with differing expectations to have that debate within the meeting, and then present an agreed outcome against which the SRO may be held to account. The programme board can be effective in reconciling different stakeholders that all want to hold the programme officials to account for different things or in different ways and then confirming the subsequent agreement on what they are actually accountable for, how, and to who. The SRO can also manage the board to determine how to prioritise the requirements of the various forums within it and to explain the subsequent prioritisation to them.

> *So we use the programme board as a means of clarification to help take the view forward.* [#253]

> *That's where the governance programme really matters, that's when you use the programme board to bring all of the account holders who feel they want to get involved, bring them together, and you have one place, one forum where they can express their views and contribution and ask for data and information, and that means that they only have that moment at the programme board where you have the opportunity for the account holders to debate with each other. I think without that governance there is just a risk that you get all the noise and the pressure coming in randomly, day by day, week by week.* [#254]

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[64] Given their importance to the management of the project and the accountability environment around major projects, the impact of the different forms of board and their account holding capability could be an area for future research.

In a study focused on public sector agencies and quangos, Schillemans and Bovens (2018, 187) described the public sector board as a check on the organisation and its management where it therefore forms a crucial part of the accountability of the establishment. This is equally relevant for the programme management boards which sit within departments. Their study identified some challenges which are also evident in the GMPP situation. Identifying whose interests to take into account can be complex. Boards and their membership may be as interested in demonstrating their role supporting the programme and the official, as much as providing scrutiny. Executives are therefore mindful of the board's limitations.

> *One of the things that was most important… was the job of engaging with all these people in the wider accountability space in order to ensure that we understood that we were doing things properly, because the programme board would not have functioned if it was the only forum through which we heard people's views.* [#255]

> *My programme board has representatives of the key customers, the Treasury, and the Cabinet Office sitting on it and some from internal finance. It has all sorts of people so it's a fairly wide group … It's where I take advice from my customers about what decisions I should be making and then ultimately it's my job to make decisions, so I don't exactly see it as a forum where I'm held accountable.* [#256]

Managing membership of the Programme Board

Within government projects the programme board members are drawn from various constituencies within the department, project beneficiaries, user groups, suppliers and regulators. Each of these may be an actual, or a potential account holding forum. Consequently, the board is regarded as a location for ensuring a collective accountability for difficult situations. Some SROs compared it to forms of cabinet government. Bringing diverse stakeholders together also avoids forums feeling that they had been adversely treated compared to others.

> *You are accountable to the Secretary of State for your department's operational delivery but at the board you can say 'I want to make sure we all have our hands in the*

blood because I'm the person who is actually going to have to account for this in the end'. The senior stakeholders are all very clear that they can go and see the Secretary of State here and say this is not going to work. So, I need to keep going, without that happening. Because often the thing that they were most worried about was the fear that we were going to do something in order to please somebody else, and I worked out the only way to do it was to have everyone in together on a regular basis and for me as SRO to be the ultimate arbiter. [#257]

Using the programme board to get priorities agreed was perceived to provide much needed clarity about the direction of the project. In this case membership became an important issue. Managing the membership of the programme board becomes a tool for the accountable official. This can be a way of bringing together forums that are regarded as salient, or can be a way of preventing an 'irritating' forum from diverting attention, by including them in decisions.

At the programme board we have HR, finance, IT, operations, a group that look after parts of the customer journey, policy, … And for the quarterly one we also have Treasury and the Cabinet Office. The Cabinet Office seems to have an ever-changing cast of people, so it's not the IPA but it's whatever relationship we have directly with them as the Department, so not really sure how that works, but to be honest in there they are treated like an alien presence. In my previous boards I've also had non-executive roles which came in from outside and they really injected a dose of vigour into many of the proceedings but not here and we should do, but I'm not aware that anyone else in this department does. [#258]

Some departments resist the inclusion of particular forums on their board. Other forums are irregular attendees, at the discretion of the SRO.

The IPA would like to have a seat our board, but the Department likes to keep them at arm's length, because they see them as just another bunch of civil servants making comments. [#259]

> *Our programme board ... our monthly meeting, is more a programme management group, because the full quarterly version includes the externals from Treasury and Cabinet office. They are excluded from the routine monthly meetings and once a quarter they all rock up and they think that's the programme board, but they don't know that we've had two others in the intermediate period because they're not there and because we are not open with them.* [#260]

> *The Treasury are invited to the boards but only tend to come to the biggest one. Cabinet office, certain parts of the Cabinet Office, GDS, Crown Commercial, IPA, they come to some of them, but it is just the IPA really. You have no expectation that the other parts of the Cabinet office would be bound by anything they say. I try to keep GDS away if I can. I generally encourage the IPA, we give them the seat, but even they rarely come.* [#261]

On the other hand, for many SROs, one way to ensure that there was coherence across forums was to bring organisations like the IPA within the immediate project accountability environment. Inviting the IPA to have a place on a programme board changed the nature of the accountability relationship. This new mechanism was seen to bring account-holding into a less confrontational environment.

> *Within the IPA they've got operations managers, and they seem to concentrate in particular areas and bring some expertise. I invite them to sit on the programme board, because I think I would rather have my stakeholders have full visibility of what I'm doing and challenge me very early on than challenge me when it's too late.* [#262]

> *Because I knew the Treasury would be anxious, my Programme Board has on it people from Treasury, people from the Cabinet office, as well as my DG colleagues from the department.* [#263]

Some used the board to help them manage their multiple stakeholder forums, and as an advisory group, rather than the board being perceived as an account-holding forum itself. For them the

board existed more as a briefing mechanism than as an accountability mechanism. There was also some frustration experienced in the limited ability of some boards to engage in the major decisions about the project.

> *I've never been to programme boards where I felt relaxed before this place, it's quite chatty and informational. It's almost gossipy, yes there's a sort of view as to 'here are five milestones and here are the days we should be hitting them and we are not hitting them because, because, because, oh dear, and there are also the reasons for that, now let's move on'. There just isn't that feeling of a rising panic that I should have on going into them. If we haven't hit a particular target it is recognised that I don't have the ability to control even indirectly many of the things which distract us from our main purpose. As many decisions are made outside the programme board as made within it. In fact, at the moment I would say more so. And the technical decisions, financial decisions, strategic decisions, all happen elsewhere and filter through to the programme board but not in a way that it gets to make a decision on them, it just has to ingest them somewhere and try and make sense of them, so the programme board exists really only as an element of the governance chart.* [#264]

6.4 An SRO's experience influences their choice of strategy

SROs described their past experience as having an influence on how confident they were at adopting any particular course of action. The evaluation of their experience was not part of the research programme and I was not attempting to measure how experienced any SRO was in either the project domain or within the senior civil service.[65] However, their ability to appreciate both sides of the role, both civil service and programme management, was influential in determining their approach. The SRO must interface with both policy and delivery staff and manage relationships with forums in both domains, giving their accounts to career policy experts like a permanent secretary one moment, and then to a professional project manager in

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[65] The experience of the SRO, and its impact on their accountability, was only touched on within this research but would be a topic worthy of further evaluation.

the next. This boundary spanning activity is not novel in the study of accountability. Bovens (2007b) description of 'many eyes' included senior policy officials, ministers, courts and auditors, as well as professional peer groups. The relevance here is that those SROs who felt they had experience on both sides, project and policy, felt it helped them manage their forums.

I don't think there are many SROs that come from a technical background, so I've got a much better sense of asking the right questions of the programme, and directing my peers to ask the right ones of me ... the thing it's changed most is my ability to hold the programme to account, and to clarify in my own mind what is actually a reasonable thing to expect from this programme, that I can then put to the users. [#265]

At first I didn't realise how optimistic some programme teams are in the stuff they put through business cases. And I've got the scars on my back as a result. That matters when you rely on them when your being held accountable and making the decisions, rather than asking for advice and agreement. [#266]

You ideally have lived and breathed project delivery yourself, and you actually need to understand the customer involvement really well to understand whether what the programme is planning to deliver really makes sense, then you also need to understand the wider political context. These are all very different skills, and it's hard to imagine who would ever have all of them, in particular there is a kind of cultural difference between the sorts of people who flourish in the programme space and like order and structure, and the world of ambiguity which is a lot of what the policy people do with ministers. [#267]

When they had extensive experience in both policy and project work, the SROs worried less about their reputation and felt they could manage their accountability more effectively.

I think sometimes when you're less experienced you don't feel you can push back and you don't feel you can challenge back, and it is your responsibility to tell your own story, that it's a challenging programme and point out things you got right then point

out the things that didn't go right but where we've learnt. You feel you can take the decisions yourself then. [#268]

> *I've got quite wide experience of doing project leadership in a variety of different forms, and I see myself as having a foot in the project management camp but also the wider policy camp. It certainly makes it easier to deal with the department knowing I understand projects and the departments' approach to governance.* [#269]

The more active SROs perceived the joint experience to be valuable. The part time SROs appeared less concerned about their lack of project experience, but others were not as convinced this wasn't an issue.

> *The Secretary of State wants something by the September, and this SRO is a bit of a policy wonk* [66]*, and hasn't delivered in time to meet the Secretary of State's commitment, and their team are months behind, so I've had to help the SRO understand their project risk appetite, and that what they've committed to the Secretary of State isn't actually deliverable.* [#270]

Conclusion

SROs actively manage the accountability environment that confronts them. They all had organisations that spent considerable time and effort to feed information to a variety of accountability institutions. Outside their team's regular reporting they all engaged in a variety of briefings and reports. They distinguished between less regular and high-profile moments of accountability and a lower level of routine briefings and conversations. These two layers of most accountability relationships were happening at the same time. When it comes to managing the multiple accountabilities, with differing expectations of the SRO, they use their assessment of the salience of the forums as an aid.

I set out four strategies they might use to manage the multiple institutions and from the fieldwork two of these emerge as the main ones adopted. The first was to bring forums together

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[66] A slang term used in the civil service to describe colleagues engaged primarily with developing policies rather than in delivery or implementation.

to get joint agreement and clarity around their expectations. This approach was evident in 70% of the interviews. The second approach was for the SRO to prioritise the forums and their requirements, using their salience as a tool, but taking the prioritisation decisions themselves as the accountable individual. This was evident in 60% of interviews. Offloading accountability to others was occasionally used, as was responding to demands as they arose, but both at much lower levels. SROs routinely used more than one approach. The programme board has emerged as the principal institution where the SRO can manage multiple forums. Using these strategies, the more experienced SROs felt more capable of managing their forums and using their own prioritisation rather than relying on achieving agreement.

Some mechanisms that principals may use to coordinate their multiple accountability relationships are evident in the creation of the IPA, and the Osmotherly appointment letter. There are also some advantages for both the department and the SRO in having multiple accountability relationships. But whatever the department may feel about the accountability of the SRO against fixed or ambiguous objectives, and however the SRO chooses to manage the complexity of their environment, the department may no longer be able to keep the SRO within departmental boundaries. The new Osmotherly rules potentially expose the individual, how they manage their accountabilities, and any departmental disagreements, to full public disclosure at the PAC. The introduction of these new rules and how they are perceived by the SROs is covered in chapter 7.

Chapter 7. Evaluating Osmotherly

It's civil servants who get called to the PAC generally, and it gets very difficult, what's the word people use … omertà… we have the things you don't say. I think that despite Osmotherly, most civil servants would still bend over backwards to avoid saying at the PAC 'we are where we are because my minister is an idiot, and despite my best advice he made these stupid decisions'… either you find increasingly elaborate ways of not saying that or you don't really get your chance to say it, so if we are in a mess, oddly, we don't go there, …that's our public service kind of mentality or ethos. [#271]

It is easy to announce a new accountability mechanism. It is not so straightforward to introduce a new mechanism so that it works as intended. The revision of the Osmotherly rules was portrayed as an attempt to increase the accountability of the SRO, to toughen their relationship with ministers, and to enable officials to inform a select committee if there had been ministerial intervention which had an impact. However, when imposed on an environment where civil service omertà exists when SROs are called to committees, it may be ineffective.[67] The Cabinet Office official who drafted the 2014 revision of the Osmotherly rules described the original intention as the strengthening of project disciplines across government.[68] Allowing parliamentary scrutiny of the project SRO was expected to facilitate a more robust assessment of problems within departmental projects. The ministers and accounting officers would have to be more attentive to major project deficiencies, because the official accountable for the project could be asked directly, in a parliamentary and public committee hearing, about what was

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[67] Omertà is a Mafia code of secrecy, also known as the 'oath of silence'. See Lurigio and Binder (2013, 204).

[68] Conversations with Cabinet Office Director, December 2015 and June 2016.

happening, particularly if the project was in difficulty. When they drafted the guidance, they described being aware of the problems that confronted SROs accountable for delivery units within policy-based environments. Although the Cabinet Office wanted to ensure all the senior figures in departments paid more attention to project implementation, with the introduction of the new Osmotherly guidance it was the SRO who was singled out to be *more accountable*.

However, being aware of the origins of a mechanism are no guarantee that it is now operating as intended. Whatever an external observer may deduce from a description of the rules, or whatever the original intention behind the revision, the way the new guidance affects those to whom it is applied, can only be understood by asking them how they feel about it, and what difference it makes to their sense of accountability. To appreciate the impact of the new mechanism it is vital to understand the complex environment it enters, and how it interacts with the other relationships that exist. In four empirical chapters I have described how SROs experience the pressures and tensions of being accountable and how they assess and manage the multiplicity of existing account holders. Building on that, in this chapter I evaluate how they have responded to the addition of the new relationship with the PAC.

The SROs described different reasons why they thought the new mechanism was introduced, and how they have reacted as a result. Some were in post when the new rules were issued but there was no overall consensus on what the new guidance was expected to achieve. Across the 47 SROs questioned about the new mechanism, their explanations fell into three approaches which can be characterised as 'civil servants should work harder', 'departments should be more realistic', and 'SROs need to enforce clarity'. The first group thought the rules were revised to enable politicians, particularly ministers, to apply more pressure on their civil servants to deliver project outcomes. In this scenario, if an SRO had to go to a committee and be held accountable for their performance, they might do more to achieve the government's intentions, and the intervention clause gave the committee the ability to probe ministerial or departmental interference in the project. A second group felt the revision was designed to enable central government, and Parliament, to put pressure on individual departments and their ministers, to be more realistic about project expectations when they were initiated. If

committees were able to quiz officials other than the permanent secretaries, such as the SROs, about their projects, then ministers would have to ensure that the desired outcomes were within the capability of the department. They felt SROs were considered to be more likely to tell the truth about any problems than the more politically minded permanent secretaries. The third group felt the new rules had been designed to give them, as the SRO, the ability to put pressure on their various forums to achieve coherence and to minimise changes in project expectations and inputs.

In the first section here, I examine the SROs perception of appearing at a PAC hearing. This has a major impact on their response to the Osmotherly revision. Their opinion of its theatrical nature has an impact on the way they manage their wider accountability relationships. The next three sections consider the three interpretations of why the rules were revised. I look first at the 'civil servants to work harder' approach and the likelihood of civil servants calling on the Osmotherly *intervention* clause. There is little indication they think the threat of a PAC hearing will make them work harder, or that they would use the new rules to alert the committee to perceived interference by ministers. However, for SROs who have limited time to devote to their projects, the threat of appearing at the PAC provides some pressure to take that aspect of their job seriously.

In the next section I assess the 'departments should be more realistic' approach. This highlights the relevance of the Osmotherly letter, and the SRO's negotiation of the terms of the project contained in within it. The final section considers how some SROs use the new rules to manage the expectations of their other forums and enforce clarity within their accountability environment. Whatever the original intention of the new mechanism when it was introduced, it is now being used by some SROs to hold other forums to account. Overall, evaluating the mechanism from the perspective of those it is applied to illustrates the range of opinions about what it was meant to achieve and how these agents regard its effectiveness. It is felt to have changed the accountability relationships within departments, but not necessarily in the way it is visualised by external observers and may not have given the apparent principals the bureaucratic controls they expected.

7.1 The SRO enters the select committee arena

When considering the SRO's opinions about the reason for the new guidance, their perspective of appearing at the PAC provides the context for their explanation of how they assess the new mechanism. Three themes arise from the interviews. The first theme was about the four relevant forums which were affected by this new relationship. External to the department are the NAO and the PAC, and within the department there are the permanent secretary and ministers. The likelihood of being called to a PAC hearing is felt to be small. Although any project might be seen as troubled, and SROs were alert to the possibility of a NAO audit, few anticipated actually having to defend themselves in Parliament. The second theme was the officials' perception that the PAC was a theatrical environment, where if they were called to account, their performance was important. This led to the final theme, which was their perspective that it was their reputation that was likely to suffer if they performed badly, and the key audience they were performing to was not in Parliament but back in their own departments.

Facing the PAC is unlikely

The PAC is perceived to be a salient forum, as explained in chapter 5, but very few SROs actually expected to be called to a hearing. Over the two parliamentary sessions from May 2015 to October 2019 there were 39 NAO reports about GMPP projects. Over the same period there were 42 PAC hearings covering 37 different GMPP projects, as some make repeat appearances.[69] The figures are shown at Table 7.1. The PAC directs the inquiry programme of the NAO, so it is not surprising that almost all NAO reports are followed by a PAC hearing. But this still represents a small selection from the GMPP list of projects. The selection of projects is not random, and those which are experiencing difficulties are likely to be those subject to audit, but the figures give an indication of the low likelihood of an investigation faced by most project SROs. The figures for the two parliamentary sessions are shown at appendices

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[69] The PAC held multiple hearings about the Emergency Services Communications project and Universal Credit during this period.

4 and 5. The data shows that the annual likelihood of a project being subject to NAO audit and then called to a hearing over this period was 8%, or 1 in 13.

Table 7.1 GMPP Projects: NAO Reports and PAC Hearings 2015-19

Parliamentary Session		2015-17	2017-19	Total
Length of parliamentary session in days	*(a)*	548	702	1,250
Total number of PAC inquiries		115	119	234
GMPP Projects at the PAC				
NAO reports on GMPP projects		19	20	39
PAC inquiries about GMPP projects	*(b)*	21	21	42
Number of separate projects called to PAC	*(c)*	19	18	37
Likelihood of project being called to PAC				
Average number of GMPP projects being undertaken during the parliamentary session	*(d)*	140	140	140
Annual chance of being called to PAC	*(c/d)*(365/a)*	*9%*	*7%*	*8%*
Number of occasions that SRO attended as a witness	*(e)*	10	16	26
Percentage of inquiries where SRO attends as witness	*(e/b)*	*48%*	*76%*	*62%*

Source: Data from NAO Reports and records of parliamentary inquiries published online at www.nao.org.uk/reports and www.parliament.uk/business/committees/committees-a-z/commons-select/public-accounts-committee/inquiries.

SROs represented their projects at 26 of the 42 PAC hearings during the two parliamentary sessions. They did not attend all the hearings where their projects were examined, as some projects were included in broader examinations of departmental activity and represented by the permanent secretary. Whilst there are some *serial offenders*, as they call their colleagues with repeated appearances, the likelihood of an SRO representing their project at a PAC, during the period since the Osmotherly rules began to take effect, is statistically low, at less than 5% in any year. Even when called to a PAC, it is often to sit alongside the permanent secretary who may answer most of the questions. As a NAO official commented:

> *The permanent secretary will have spent the weekend cramming for this and although not having a deep understanding, will want to do most of the talking, having put in all that effort!.'* [70]

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[70] Interview with senior NAO official, 2019.

The SROs participation in the hearings is often limited, as their response rate to questions indicates. During the hearings in the 2017 parliamentary session there were 21 inquiries in which oral evidence was taken about a GMPP project and the SRO was present as a witness in 16 of them. On these 16 occasions the committee asked the witnesses between 10 and 256 questions.[71] The maximum answered by an SRO was 133 from 161 questions, and the minimum was 3 from 229 questions. The ratio of answers by the SRO during these sessions ranges from 1% to 83% of the questions. In 7 of the hearings they answered less than 25% of the questions. Those answering the most were the SROs who had been called to the PAC on multiple occasions, and these individuals had become capable witnesses. As Meg Hillier, the chair of the PAC, noted:

> *Both Universal Credit and Emergency Services Communications have very effective and experienced SROs. They know the detail and can be robust in their response.* [72]

The PAC is keen to have the permanent secretary at the hearing, as accounting officer and responsible for the expenditure of the department, although this can require management.

> *We do firmly believe in having the AO there, but occasionally the AO can upstage the SRO, because they feel they are in charge and they will try and run the show. Sometimes we have to insist that we speak to the expert, who has the job title, and knows the detail about the thing we are interested in. We sometimes have to direct the questions.* [73]

With the likelihood of being called to a PAC seen as low, most SROs regard it as a *dormant* forum. On the other hand, a small majority described it as *dangerous*, aware that an investigation could be triggered if any problems occurred. For a serial offender at the PAC it is likely that the forum will have become *definitive*, as over time the committee may have

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[71] Data from transcripts of oral evidence at www.parliament.uk/business/committees /committees-a-z/commons-select/public-accounts-committee/inquiries/parliament-2017
[72] Meg Hillier, chair of the PAC, in discussion with the author, 2020
[73] Meg Hillier, in discussion with the author, 2020

developed sufficient competence in that project to be able to act as a focused and expert forum. However, for those yet to attend as a witness, few regarded the committee as having the expertise to investigate the project effectively and so even when an inquiry had been launched it remained in the *dangerous* category. On the other hand, a comment about the committee members from the Comptroller and Auditor General of the NAO reflects a different perspective.

> *They are not experts, they are not meant to be, within our parliamentary system of governance. However, they get an expert briefing with expert questions and by the time they have been on a committee for a while they will have seen a lot of major projects and been given lots of information about how to question them.* [74]

The committee members use the NAO report as a basis and also draft their own questions, working with the chair of the PAC before the meeting to prepare an inquiry that will cover their main concerns.

> *The NAO produce some questions, but we go beyond that and committee members prepare their own and have specific areas they will want to focus on. All members will have done their homework and will be well prepared for the committee.* [75]

Whether or not the committee members can act as experts, they will be well prepared for the meeting, so dealing with the NAO and the PAC requires significant attention by the SRO. When managing multiple salient forums, the SRO will normally prioritise or seek agreement. Prioritisation is evident in the handling of relationships with the NAO. SROs keep them briefed and attempt to create routine engagement with their staff.

> *You try to develop a close relationship with the NAO and the team that deal with the department. They are at the top of the list to keep briefed on how things are going, even when there are problems sometimes.* [#272]

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[74] Interview with Sir Amyas Morse, Comptroller and Auditor General of the NAO, April 2019.
[75] Meg Hillier (chair of the PAC), in discussion with the author, 2020

Whatever routine engagement the SRO has with the NAO, the situation changes when a formal review is initiated.   Figure 7.1 shows the relevant forums and how they change category once an investigation is triggered.

Figure 7.1 Typology: Key forums when the NAO audit is triggered.
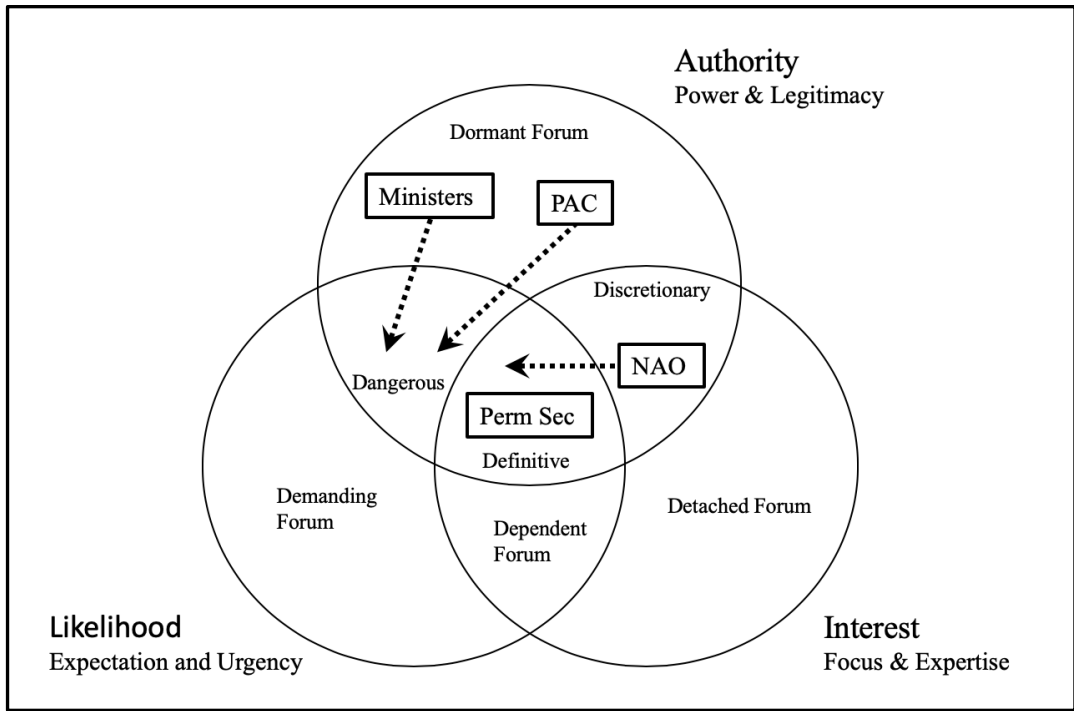
Note: The perception of the salience of key forums changes when an NAO review or potential PAC hearing is initiated. The dotted lines indicate the changes in salience categorisation, as described by SROs.

When a committee hearing is expected, the PAC moves from being *dormant* to *dangerous*, and at the same time the ministerial team will become much more interested.

> *It can be difficult to get a minister up to speed sometimes. They haven't really had the project on their radar and then the NAO comes around. I have an hour or so to bring a minister from zero to well-briefed about a multi-billion-pound expenditure we've been planning for three years. Some are really good at taking it in, but not all can. The most difficult ones ask you to send a half page of A4 with just the key points.* [# 273]

At this point the principal account giving activity for the SRO and their team will be their response to the NAO audit, working with colleagues in the department to ensure any report is positive as well as accurate. The NAO report will inform the PAC hearing.

> *The problem for us is that when the PAC winds up the NAO, and sends it off to investigate, you realise that they hunt in packs these two, and facing them both there's quite a lot of teeth on show. You have to keep the NAO close because you can't make enemies in the PAC.* [#274]

The minister, the permanent secretary, and their private offices will need to be kept informed as well. An impending hearing draws together these elements within the department and requires a significant amount of management. The SRO's approach to giving evidence to the PAC will now be guided by the Osmotherly rules. In the past an SRO might accompany their permanent secretary to a select committee, if thought appropriate. Now the select committee has direct access to the SRO, although the permanent secretary, as the accounting officer of the department, may also be called, at the committee's discretion.[76] Whatever their views on the expertise of the PAC, accounting for the project in a televised setting, when the account-holding forum has a well-prepared report, is a daunting task. As one SRO said:

> *The PAC. It's not really a good forum, but it is one hell of an arena.* [#275]

The PAC as a performance

The PAC is an authoritative account holding forum. SROs frequently expressed doubt about the ability of the PAC to act as an effective forum because of the nature of the hearings, although a hearing was always regarded as a powerful mechanism. It is never dismissed as irrelevant, despite the perspective that it is often more theatrical than investigative. SROs prepared themselves and their projects for audit by the NAO with the hope of avoiding a call to

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[76] "*Sometimes we don't want to talk to the accounting officer, as we have been through the project before and we now want someone who is more into the detail*" Meg Hillier (chair of the Public Accounts Committee), in discussion with the author, 2020

account from the committee, or at least avoiding the most challenging questions. Most felt that a NAO audit was effective, but the PAC was less effective as the stage on which to debate the resulting report. On the other hand, the power inherent in the NAO audit, and any change it creates within the project, comes from the prospect of the follow-on PAC hearing, as Sharma (2007, 304) noted in a review of the NAO-PAC process. Whatever the view of its effectiveness, appearing at a PAC hearing was regarded as challenging.

> *The PAC at the moment is a public execution of people. People are terrified of it, and now do anything to avoid it. In some cases, this may be an overt fear, or it may be more stress, but in some cases it drives perverse behaviours.* [#276]

> *Look at the private sector and you see big things being delivered, but here it's more about saying I managed not to get shot by the PAC and that's a big tick and it's the performance at the PAC that you worry about, not actually that you will have struggled to deliver something that will be of social benefit.* [#277]

Officials expect the experience to be 'bruising'. The current chair of the PAC also felt that the style of the committee was important for it to achieve its purpose.

> *We can be a bit confrontational, but we are there to ask questions and get answers for taxpayers. We are very clear about our role in that room.*[77]

Reflecting on the experiences of civil servants appearing at committees, former Home Secretary Jack Straw commented, 'just as the job of a politician has become more perilous, so has the job of a civil servant' (Aston 2015). There is much to explain when a programme is in difficulty. The NAO has time to delve into the project in detail, but SROs felt the complexity of the issues rarely lent themselves to the subsequent short examination at a public committee.

> *I do think there is a contrast between the questions they ask and the binary answers they want, compared to the complexity of delivering a major programme. I often feel*

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[77] Meg Hillier (chair of the Public Accounts Committee), in discussion with the author, 2020

very sorry for the witness who is asked 'is that a yes or no answer', whereas complexity can't get distilled into a yes or no answer. [#278]

There are projects where we are spending billions over the next few decades and you've got less than an hour to explain some of the problems you were dealing with from a year ago. And they don't really want to hear the answer, they want to prove to the public and their constituents that they are getting tough on failure. [#279]

Dealing with this complexity, across a wide range of project types and at various stages of implementation, the committee members were perceived to have a mixed capability to examine projects and their problems, as noted in chapter 5. Whilst some were regarded as probing effectively and were interested in how the committee could actively support improved project delivery, SROs felt that the PAC was often an ineffective examination.

I think at the back of people's minds it's the awful Stalinist show trial that you get at the PAC when you get some hapless individual who is ritually disembowelled by MPs. [#280]

When I sat in front of it there was lots of various sophomore type questions that you might get in the Daily Mail or in a kind of shock-jock type way which, when it's supposed to be accountability, I didn't think that was very good really. It was done in a very aggressive way, so it didn't feel as if they tried to make people accountable, it felt more like punishment. [#281]

As a result, the mechanism is sometimes seen as *'a bit of a game'* [#282] and felt to be theatre rather than a positive way to investigate project performance. As a result, considerable effort goes into preparing for a hearing. This could be seen as appropriate for such an important forum but is often seen as preparing for the performance rather than using the mechanism to help the project deliver the planned benefits.

The committee hearing is not a process I relish and that's why I'm going to prepare for it. [#283]

I have two teams which I work with to prepare for the performance. One team is to brief me for the PAC, and the job of the other team your job is to act as the PAC,

and I'm going to go to role-play with these teams and see how I get on. We are

probably going to film it, and then see what feedback I get, and how poorly I perform.

Hopefully I will give a good performance at the committee. [#284]

> *The danger is that I might appear too scripted and when a question comes that*
> *I can't answer I'm not prepared and I look a right numpty, that's not what I want.* [#285]

Throughout the discussion on parliamentary committees the participants adopted a frame of

performance and theatre. The select committee as 'theatre' is not a view restricted to these

SROs. The concept appears in the media (Vize 2019), and was addressed by Sharma (2007)

using a dramaturgical approach. The select committee members themselves may also recognise

the interpretation. As Dame Margaret Hodge, the past chair of the PAC noted, having limited

executive authority or tools to hold witnesses to account, getting the public's attention with

'moments of hyperbole' was considered justified (Hodge 2016, 67). It was when the SROs

began to discuss the PAC, that the sense of giving an account as *performance* became

significant. Much of the SROs' discussion referred to reputation and could be described as a

presentation of themselves as competent officials and project leaders (Goffman 1959).

This sense of the PAC as performance is captured by Sharma (2007) in a review of two

NAO audits and subsequent PAC hearings. The NAO prepare a briefing for the PAC chair

which contains the main points from their audit and highlight the key negative aspects, with

suggested questions, anticipated responses, and follow up questions. Then the committee

members work with the report and prepare the range of questions that will then be used in the

hearing.

> *The NAO now write in a style that the PAC asks for, but we will have prepared*
> *seriously beforehand and have our own specific questions. The questioning also rolls*
> *with the meeting and if unusual or unbelievable issues arise you can feel the committee*
> *take note.* [78]

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[78] Meg Hillier (chair of the Public Accounts Committee), in discussion with the author, 2020

Sharma (2007, 303) describes how the carefully worded public reports from the NAO contrast with the intense criticism that the MPs can deliver, drawn from that report and their briefing by the NAO. She describes 'the performance of the hearings seemed to be as, if not more, important than the substance of the hearing' and recognises 'the PAC instils a sense of authority and sanction which the audit report alone could not achieve.' The NAO recognise that it is the appearance at the PAC, and the transparency of the ensuing debate, that supports their authority to investigate all aspects of project activity within departments.[79] This was corroborated by the SROs. Their perspectives match Sharma's (2007, 306) observations and they see the MPs' performance as one designed to demonstrate their own authority as the 'enforcers of accountability to the public and the press.' On the other side of the committee table, the civil servants are trying to create their own impressions of competence.

Personal Reputation at the PAC

Like permanent secretaries in front of committees, SROs now need to demonstrate their skill at the PAC. The hearings are dramatic moments, matching Rhodes' (2011, 58) description of 'grand drama with dress rehearsals in the departments and questioning which resembles bear baiting.' Now that hearings are televised, when things go well, they may be remembered, but when things go badly, they are unforgettable. One participant spoke in glowing terms about their permanent secretary.

> *They gave a master class in how to do a PAC during their attendance.* [#286]

Others recall different outcomes.

> *In government circles there are some very memorable PAC appearances where people really bombed.* [#287]

> *We saw that with one GMPP, when in front of the PAC, and they asked "can you tell us where the £100 million went" and they basically said "no not really".* [#288]

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[79] Interview with Sir Amyas Morse, Comptroller and Auditor General of the NAO, April 2019.

Several SROs mentioned the hearing in 2011, when the chair of the PAC made the HMRC General Counsel answer questions on oath, which was still regarded as 'a moment of high drama' many years later. (Hodge 2016, 66, www.parliament.uk 2011b). [80]

Giving evidence requires some skill on the part of the official. In a recent media article, Vize (2019) claims that the current select committee system has become the most public test of civil service skill. He quotes two past Cabinet Secretaries:

> 'It is an important test as you become more senior. When politicians are trying to get you to say a specific quote, it does require a degree of understanding of how to perform publicly, and that's part of the skill set of the modern civil servant' and 'Often the committee are looking for you to say something which will embarrass the minister or create problems – that's why you'll hear a lot of people say that the best result you can get is a nil-nil draw.' Lord Gus O'Donnell.

> 'You are not there to make it exciting. On the whole, you are playing the dead bat. There should not be anything coming out of select committees which is 'surprising' to ministers, if I can put it that way'. Lord Bob Kerslake.

What was evident from the interviews is that SROs define a good performance as one where, to mix metaphors, you play 'the dead bat', as Lord Kerslake suggests, and where the best you can achieve is Lord O'Donnell's 'nil-nil draw'. The situation is evident to committee members.

> *The best, or is it worst, permanent secretaries don't reveal very much, and some get very worried about the wider political ramifications of what they are saying. We want to speak to the SROs who tend to be across the practical detail which is what we need.*[81]

Being aware of the detail is important, but for SROs not embarrassing the department or the minister is felt to be vital, as was not embarrassing yourself or damaging your image as a proficient civil servant. It is important that the permanent secretary and your DG colleagues have a good opinion of your performance.

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[80] See also the comments and footnote on Page 107 regarding another memorable appearance.
[81] Meg Hillier (chair of the Public Accounts Committee), in discussion with the author, 2020

When appearing at the PAC, the audience that SROs were most concerned about was only incidentally the committee. Whilst the talk was about being 'bruised' by the committee, they also felt under scrutiny from their peer group and their departmental colleagues, and particularly the permanent secretary. These individuals were regarded as understanding the challenges inherent in the role and their judgement of project failure or project difficulty was felt to be different to those MPs at the committee, or anyone else watching. The SROs concern was reputational and not wishing to look incompetent in handling the PAC. These implicit and informal consequences match Bovens' (2007a, 452) description of the potential 'disintegration of public image and career as a result of the negative publicity generated by the process'. In effect, accountability to the PAC was the mechanism but their concern was less for the judgment of the PAC about their projects, and more concern about the judgement of their peers on their performance in the arena, with the sanction of reputational damage. [82]

> *I don't want to look like a fool at the PAC and have my SRO colleagues think I couldn't hack an appearance at a committee. It's not about the project then, it's about me being seen to be competent at this level.* [#289]

> *I don't want other SROs feeling sorry for me behind my back 'cos I screwed up at the PAC.* [#290]

> *Some senior people have been on the MPLA, so should understand some of the pressures I am under and I see that as important. It's about relationships, and that group, the cohort from the MPLA, they're the ones who really understand what it's about trying to run these big programmes.* [#291]

The community of SROs who had attended the MPLA was regarded as a peer group that was important to the SRO in terms of self-presentation and impression management. The performed character (Goffman 1959, 245) of 'competent SRO' was capable of presentation to dramatic effect at the PAC in a way that could not be matched by written IPA reports or internal

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[82] The permanent secretary's reputation is also under scrutiny at a PAC hearing, either directly if they are giving evidence, or because they selected the SRO to be accountable for the project.

departmental briefings. The SROs' peer group was now perceived to be acting as a *deemed* forum. A formal mechanism has created an informal one.

7.2 Interpreting the guidance, working harder, and citing intervention

A 2013 report by the Institute for Government into civil service accountability to Parliament, and the Osmotherly rules, asserted that even for those who attended committees, it was 'questionable how central a role the rules play in providing guidance to civil servants who deal with select committees' and suggested 'a focus on the precise wording of the rules therefore seems misplaced' (Paun and Barlow, 13,14). But that was focused on permanent secretaries and the heads of agencies and before the revised rules were published in 2014. Since then the SRO has not only been accessible to the select committees but has had that principle written into their letters of appointment. Now, the precise wording of the rules is not only relevant but is the subject of discussion amongst the SRO community. As noted earlier, when talking to SROs there were three interpretations of the intent behind the changed guidance. I describe these three approaches as 'SROs to work harder', 'departments to be more realistic', and 'SROs need to enforce clarity', and the first of those is addressed here.

Making the SRO work harder

The IPPR report which recommended revising the Osmotherly rules suggested strengthening the external accountability of SROs to give parliamentarians increased capability to hold the SRO to account (Lodge et al. 2013, 119).[83] This would align with the intent behind the changes being to make SROs work harder and be more diligent, to ensure the project was delivered to time, cost, and planned outcomes. Within that interpretation there were two perspectives which emerged from participants who felt the new rules were being used to make them feel more accountable for their actions. The first was their own, when they perceived that 'try harder' was the underlying message. The second was that whatever they thought personally, they felt other

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[83] External refers to being held accountable by institutions outside the department.

groups within their department or across government thought this was about making an SRO try harder than in the past to get the project completed successfully. These other groups included their project team, departmental DGs, or their minsters. On several occasions during the interviews I was directed to paragraph 26 in the Osmotherly guidance document. They described it as an announcement that if their project was in trouble they would be hauled up in front of the committee to explain themselves. The failure of the project for any reason could then be pinned on them.

> *It was all designed to make civil servants and the civil service more accountable for what ministers wanted to get delivered as opposed to it just being the minister that was accountable. We were all meant to work harder so that the project got done and the minster wasn't dragged off to explain why it wasn't working.* [#292]

A few commented, partially in jest, that the harder work that they were expected to undertake might be the increased activity preparing for a select committee appearance. Few SROs felt that the threat of a hearing would make them work any differently. It is difficult to imagine how much more any of them could achieve in terms of time and effort allocated. From the conversations, it seemed unlikely that anticipating an appearance at a committee hearing would increase their conscientiousness. That is not to say that appearing in front of the committee was not seen as threatening, because for most it was definitely a concern. However, the idea that a future committee appearance might make them work harder, or exhort their teams to work harder, or discover new ways of delivering success that had previously been hidden, seemed unlikely.

> *The sort of stuff that Francis Maude did was following the line that Richard Bacon had been suggesting for some time and was to try and bring in a really quite unusual level of personal accountability to SROs.* [#293]

> *I think someone probably thought at some point that that would influence greatly my performance, and I don't think it does really. I'll take my chances with them or when anyone else comes knocking.* [#294]

The perception was that this was inherently about blame and that by focusing on things that went wrong, and giving an SRO a tough time at the PAC, other SROs would be more likely to do whatever they needed to do to deliver their project, thereby ensuring it didn't happen to them. McCubbins and Schwartz (1984) argued that effective oversight of the executive by the legislature was possible by means of the 'fire alarm' principal, rather than the 'police patrol'. This involves focusing on the things that go wrong rather than extensive surveying of all activity, and is the approach adopted by the PAC. Exposing project failure, its cause, and impact, and giving the accountable SRO a difficult time at a hearing, should encourage other project leaders to pay more attention to their projects and thereby avoid the same exposure. This allows parliamentarians to monitor the activities of a complicated executive, whilst avoiding the creation of an even larger oversight institution within Parliament. Civil servants are not called to a committee to be congratulated for doing their job well, so a negativity bias, described by Hood (2011, 10), can be expected, along with risk aversion in public sector project leaders.

The exposure of a problem at a PAC hearing is bad news for both civil servant and their minister (literally, as it will be picked up by the media). For some, the prospect of the PAC hearing was so terrifying that they explained they would avoid exposing too much to an audit or investigation which might result in an appearance at the PAC arena.

> I *do not want to be anywhere near the PAC so I'm going to do everything I possibly can to make it appear that the project is lovely and happy... I may be doing my colleagues a huge disservice, but I think that's what drives quite a bit of that, so I don't find these processes are robust. So here the option of being dragged before the PAC obscures accountability and makes things far worse.* [#295]

If the Osmotherly changes were designed to make the SRO feel under more scrutiny, particularly from the PAC and the NAO, then they have had some impact. The PAC was perceived to be theatrical in its operation and SROs felt it was important to put on a good performance. For many it was not felt to be an effective format for holding them to account.

But on the other hand, the NAO audit which leads to a PAC hearing was invariably seen as a useful exercise.   For full time SROs there was no doubt that the PAC hearing was an important accountability relationship but not one that they felt made them work any harder on understanding or controlling their projects.

For those civil servants whose SRO role represented a minor aspect of their job, the prospect of a PAC hearing was significant and caused them to take an active interest in the project. Whilst they commented that they didn't feel they were doing more to guarantee the success of their project than they would have done before, they were aware of the need to be prepared for an audit or committee appearance. They described the need for suitable management processes and accountability relationships within their project management team, so that they were aware of the detail, and any problems that arose. This was partly to ensure they didn't have to face a PAC hearing, but also to be prepared in case the PAC decided the NAO should audit. The new guidance may therefore have had some impact on the SRO attitude toward their project oversight. If the aim of the mechanism is about realising outcomes by creating the expectation of delivering an account, then getting SROs to prepare for that potential moment may have that impact, without the account ever having to be delivered.

Would anyone really '*drop the minister in it* ?'

There was a perception that enabling the SRO to be called to account personally was about opening up the debate on project failure to bring those involved in implementation from out behind the minister or the permanent secretary and to exposure at a committee. No SRO felt confident that the clause about 'intervention' would result in any new behaviour by them. The invitation, in Paragraph 28 of the guidance, to report any intervention that had implications for the project, was frequently commented upon in the interviews. The consensus was that the intent had been to remove the '*you will have to ask the minister'* defence from the SRO when responding to PAC questions. Officials are often criticised for hiding behind their minister when committee questioning approaches policy, which is the minister's area. They are felt to

avoid accountability for project problems during the session, as they fend off questions as being inappropriate for civil servants to answer.

It's often interesting to see when their questioning moves from NAO facts about implementation and closer to political opinion about policy or intervention. Sometimes its clever and you have to be careful. Other times it's blatant. You just have to point out politely that you think that bit is policy and they should ask the minister. Sometimes it's not even clear if it's you or the minister, but there is always a way of saying 'that's policy, ask the minister'. They're not always happy. [#296]

Officials perceived paragraph 28 as enabling the committee to probe areas where there had been changes to timescales or funding, and where in the past the civil servants had responded by deferring to the minister, stating these were policy matters. The committee could now quiz the SRO, not only about any intervention but about whether or not they had agreed to accept any change. Some saw the clause as a warning shot fired against departments, minister or other civil servants, to stop them changing project deliverables, resources or timescales without being prepared to have those discussed, and criticised, at a hearing. For those who saw it making them accountable for bringing evidence of intervention to the committee it was felt to be unlikely to succeed. It was regarded as an invitation to *'commit career suicide'* by more than one participant. Some described it as an invitation to become a whistle-blower:

I've run the hypotheticals about what happens when they've given me this personal accountability, and I get to the point where everybody else says 'well no, we want you to do this, and I say well that's injurious to the project'… what then happens? Because in theory I am meant to pop a little note in to the select committee chair and potentially the chair of the Public Accounts Committee, depending on how strong the interest, and say I'm being asked to do something that I don't think is in the best interest of this programme. [#297]

I can't ever imagine going to the PAC and saying someone has intervened, this civil servant or that minister. That whole thing would be an incitement to commit career

suicide. The PAC members will be long gone when your perm sec or minister calls you in to ask what the hell you were playing at, in the nicest possible terms of course! [#298]

That is what Maude wanted. We are meant to wave the Osmotherly letter towards the select committees if there was interference which changed things. [#299]

Whilst whistle-blowing in these circumstances could be regarded as role-prescribed (Near and Miceli 1985, 2), no participant indicated they would ever initiate contact with a committee in that way. Although, on the other hand, it may be unlikely that they would admit to harbouring whistle-blowing intentions to an academic researcher, even in a confidential interview. Whether likely or not, this was certainly not the impression they wished to give of themselves (Goffman 1959, 243).

Officials are aware that their projects may have been influenced, adversely, by other civil servants or their own ministers. That doesn't mean they would ever introduce that to a committee. On the other hand, the threat of such exposure may empower the SRO to push back against those wishing to intervene. There was no shortage of evidence that SROs were frustrated at the level of intervention in the past.

Over the last two years we could several times have been in a position of asking our permanent secretary for a form of direction from ministers for decisions the department has or hasn't taken. [#300]

Parliament has never come knocking so far to ask me to explain myself, but if I did have to go and explain myself, there are certain decisions in each of these programs, for which I now have oversight, which I know ministers have taken which will really affect the outcome. [#301]

It's not only ministers who interfere or influence the environment in a way that can tie our hands and make it quite difficult for an SRO, because you're supposed to be accountable for the programme but at the same time people in the centre of government, like the Cabinet Office, are saying I want you to do it this way, but they are not accountable, so you have people with power without responsibility, and it is better than it used to be, it was terrible before, but they say I want you to do it this way…

disaggregate this contract to the nth degree, or you can't have any contract that lasts more than 3 years or more than a hundred million pounds in total, or whatever, but you're the one is going carry the can if the whole thing collapses and then you won't see these people for dust. Is that interference, or just business as usual? [#302]

Whether or not they sensed interference or intervention, there was no official who felt it would be easy, or even acceptable, to use the 'intervention disclosure' clause during a hearing to '*drop the minister in it, at the PAC'.* [#303]   It was felt to be a dangerous action for a civil servant, and many expressed a desire to avoid being drawn into a political battle between the members of the committee and their ministers.

I guess the things would have to be pretty extreme to use that letter as a lever. [#304]

I can't see any civil servant ever doing that, it doesn't work like that. No one will ever rat on the Minister. [#305]

The Osmotherly rules, yes in theory we are to go to Parliament. I think it's a very brave SRO that would go to Parliament and discuss what ministers have done. I don't think it has changed anything about the way I operate here. [#306]

It's a nuclear option, its exactly like the letter of direction that the accounting officer can ask for, and they will do almost anything to avoid asking for that. [#307]

It's fascinating when you hear all these demands for civil service transparency and then your minister's office makes it very clear that your views on the project are your own and don't reflect the confidence the minister has in the project. Is that message from him, the SpAd [84]*, or the Perm Sec, who can tell. It's just made very clear, in a very deniable way, that you will not be heading off to a select committee to give any bad news.* [#308]

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[84] SpAd: Special Advisor, a temporary civil servant appointed to support the minister and the government. They 'add a political dimension to the advice available to ministers while reinforcing the political impartiality of the permanent Civil Service by distinguishing the source of political advice and support.' (www.gov.uk/government/publications/special-advisers-code-of-conduct).

Some felt it would be inappropriate to blame ministers for intervention. The lack of explicit hierarchical arrangements and the vagueness of arrangements for ministerial oversight mean it would be difficult to identify at what point ministerial intervention had happened. The challenge is similar to that of 'deemed ministerial approval' described by Page and Jenkins (2005, 163). SROs might feel a minister or official had intervened but would be much less able to prove that effectively or succinctly to a committee in Parliament.

> *It would not be easy to point at something in the project and say that was because of the minister. Obviously, there are classic examples where a Secretary of State has insisted something is done and which his SRO has pointed out is impossible, only for him to be told do it anyway. But in most cases, it's not easy to say quite where a minister has been involved. There's often no paper trail to indicate why things are done the way they are, not one that would stand up in court, or at the PAC. Ministers have a way of agreeing or disagreeing which doesn't always appear in writing. And to be fair, we also have a way of writing things which doesn't need them to.* [#309]

Often the sense was of ministers being rather detached from the projects once underway, and intervention came from other directions. But even if that was the case, the official's reluctance to comment on ministers or other officials was always reaffirmed. The civil service loyalty to ministers described by Rhodes was still very much in evidence (2005, 15).

> *I don't know if any civil servant, or SRO, has ever tried to exercise it, but it would be very surprising, because I don't think there are many programs where you can fairly accuse ministers of that, there may be some and if they do, I'm sure most civil servants will think very carefully about saying so in public.* [#310]

> *There is almost like an unwritten protocol that there was no way that you would ever go to any select committee or the PAC and criticise your Minister. And you don't criticise the Treasury, that's also an unwritten rule. It would be very easy for me to go*

in and say the reason I have done this is that the Treasury wouldn't give us the money in

time, but that is not acceptable. [#311]

From the interviews, it was clear that very few SROs would contemplate using their new

Osmotherly based authority to raise concerns about intervention affecting their projects, even

when quizzed on the subject by the PAC. For many the rules were just a means of making them

feel there was a stronger spotlight on them to ensure they did all they could to get the project

delivered. With negativity bias, and a sense that they were potentially to be blamed for

departmental or ministerial failure, the PAC was felt to be a particularly challenging forum.

7.3 Appointing an SRO: Negotiation, the letter, and the Osmotherly annex

When Francis Maude was planning to implement the changes, alongside his comments about

using accountability to 'toughen the relationship with ministers' he also argued that it would

give officials a 'greater incentive to challenge developments they believed were wrong' (Neville

and Parker 2013). This would align with the second interpretation of the intent behind the new

guidance, that it was an attempt to get departments to be more realistic and pragmatic about

setting the objectives of projects and resourcing them appropriately. This would be brought into

effect as the SRO appointment was undertaken, as at that stage it is necessary to define what

they will be accountable for. Many felt that the revision was a device to put pressure on the

department, because the SRO would attend the PAC to explain any problems, which would then

expose poor project definition, over optimism, or poor resourcing.

The new accountability mechanism was focused on creating 'something' against which

they would be measured. The SROs felt that the threat of their being called to the PAC enabled

Parliament to put pressure on departments to be realistic about project expectations. They could

also limit the department's subsequent interference with those planned outcomes and allocated

resources. If committees were going to hold SROs to account, then their ministers and

permanent secretaries would have to ensure that the programmes were within the capability of

the department and they were resourced and given appropriate timescales. For the SRO, being

able to negotiate the terms under which they accepted the role was therefore a critical aspect of

this interpretation. To achieve something against which to hold the SRO accountable, the Osmotherly letter requires serious consideration on both sides when issued, and thereafter as things changed.

> *I've got my SRO letter of accountability and you can see it on the internet, its publicly available, and its currently being amended to reflect the changes in the plan which I've asked for.* [#312]

> *It's quite scary when they arrive, it's a very solid public facing document essentially, and is it right it should be when there is quite so much, you know, capital monies involved, revenue monies involved, and the livelihoods of all these people involved in the project.* [#313]

Recent guidance from the Cabinet Office (IPA 2019b, 14) states:

'The senior responsible owner of a GMPP project shall discuss and agree the terms of their appointment at the outset of the project, or at the point when they join. These terms shall be set out in a formal letter of appointment from their organisation's accounting officer and the chief executive of the IPA, as required by the Osmotherly rules. Once a project has had an initial business case approved, the appointment letter shall be published on the department's website.'

It also advises that the appointment letter should set out:

- 'The point at which the senior responsible owner becomes accountable for the project

- The time they are expected to commit to the project

- The tenure of the role, linked to key milestones on the project

- The extent and limit of their accountability

- A clear statement of the status of the project, identifying material issues and constraints

- The SRO's objectives and performance criteria, covering delivery of the project, projected outcomes and required benefits

- Decision powers, controls and delegated authority

- Key interfaces and relationships, particularly with the business owner of the delivered
  project'

The appointment letter instructs the SRO to understand and follow the guidance contained in the Osmotherly rules and the IPA guidance on the management of major projects. The document makes regular use of the term accountable, including 'the extent and limit of their accountability' but does not define in detail who to, or exactly how this accountability will be assessed. On the other hand, it does refer to the establishment of 'appropriate governance, assurance and programme management' and that accountability relationships should form part of that. The letters are not imposed on an SRO but are negotiated with them, more or less, to ensure that the SRO accepts the underlying terms of the accountability they are undertaking. In most cases this is where budgets can be confirmed, timescales agreed, and deliverable benefits outlined.

> *One of the main mechanisms for setting the arrangements for what I am accountable for and who accountable to, is the Osmotherly letter.* [#314]

> *There is an initial negotiation you can do, yes, when you get the letter the content can be negotiated to a degree.* [#315]

Negotiating the appointment letter

The negotiation of the letter is taken seriously by SROs. Although the content cannot cover everything, it does outline the framework within which their accountability will be exercised. For some there was considerable negotiation involved.

> *In my case this has taken some while, I don't even think it's signed yet, or finally agreed to by the Cabinet office, and one of the reasons is that in my programme area it's been quite difficult to agree the text, because I do feel very accountable for what I am doing. So I do feel personally accountable and I do understand that when it comes to delivery decisions that I am taking on the programme, that sits with me, and I can be called to*

the PAC or to the departmental select committee to explain why I have done one thing rather than another. [#316]

I signed my Osmotherly letter last autumn and it's kind of like a double-edged sword, but I think they are helpful because they set a framework. It's never going to be a complete framework and you'd never be able to provide a framework which answers every question exhaustively, so I think getting strategic alignment and retaining that is a key role of the SRO. [#317]

Not all SROs felt they had had the opportunity to negotiate a satisfactory conclusion. It can be regarded as an opportunity to discuss the parameters of the appointment in detail but for some there was little choice. If the Osmotherly Letter was meant to be an opportunity to negotiate realistic project expectations and resources then there were SROs who felt the reality of being offered the role, and the ability to negotiate, precluded the kind of response envisaged.

I've heard John Manzoni [85] say that if you're involved in a major project, you should never accept accountability unless the resources are there. This is both inspiring and frustrating in equal measures because I'd love to be able to say that but I guarantee that if I was to say to my permanent secretary that I'm not going to accept accountability unless you give me all these resources, they would respond okay I'll find someone else to do it then. [#318]

If you had the negotiating power to say I will accept that letter but only if you give me all of the people, and all of the money, and all the things I need, you'll still find it just doesn't work like that. One of the things that's against that is that you have to do a series of staged business cases to secure the funding, so even if it's a government policy, implementing policies that have been agreed in the department, to get the resources I need to go and regularly secure them from the Treasury, and they work for the chancellor, who now wants to impose these other things on you. [#319]

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[85] Now Sir John Manzoni KCB, he was appointed chief executive of the MPA in 2014 and appointed permanent secretary at the Cabinet Office in 2015.

The nature of the appointment process varied between the SROs.[86] Some had been in post for months before agreeing their terms and others negotiated their letter before taking the post. Most SROs become cognisant of the outline of the business case before assuming the role, but the level of detail varied.

> *I think it's a Cabinet Office type template. So there is not much choice in signing up frankly, to be brutally honest. I did comment on a few earlier versions, but I don't think that you get that much choice really.* [#320]

> *There was very little negotiation, partly because I wrote it, or my programme director wrote a first draft, about what we were signing up to do, so I think by the time the letters came in I was here and years into implementation, so there were things I put in there about the support that I needed from the Department, and what I needed in terms of budget and staffing and all the rest of it.* [#321]

> *If I had my time again, I would probably have negotiated a little bit, but the real negotiation about accountability in my case it felt like it was about what I got the investment committee to sign up to. In theory I could be in front of the PAC, although without trivialising it, my programme is less than a billion through life so it's not really a big news headline thing in terms of scale.* [#322]

For those whose roles as an SRO take up a small amount of their time there appeared to be less demand for a serious negotiation about the accountability criteria.

> *I suppose I just trusted the Perm Sec and took the SRO bit as part of my day job here.*
> *Anyway, it's important to be seen to be involved in implementation these days.* [#323]

Negotiating the parameters of their accountability may be subject to much discussion by SROs but there was evidence that few anticipated significant changes in their behaviour.

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[86] This was not pursued as a research topic, but has an impact on how seriously the SROs regard the content of the Osmotherly letter.

> *I got the Osmotherly letter, and didn't negotiate much, and I think at one end of it I think it's extreme naivety and at the other end of the spectrum its actually got some very hard levers over the programme.* [#324]

> *I don't feel any different about having an SRO letter ...you know that a bit of me says I don't need that letter for me to be publicly accountable, for whatever it is I'm required to do, or whatever I have been required to do in the civil service.* [#325]

> *We have them but it's not as if we look at them every day, they're not pinned onto our foreheads or anything like that.* [#326]

Accountability parameters change faster than Osmotherly letters

The recent guidance from the IPA (IPA 2019b, 15) suggests the letters should be updated on an annual basis. There was little evidence that the letters were subject to such review, although some had been changed as a result of significant changes to their projects. In some cases, the initial negotiation was already problematic.

> *I had less of a problem than some others, but I know some colleagues in other projects have had very difficult times, because they were not willing to sign up to what was in their Secretary of State's vision because they didn't believe it was deliverable. So, in the true civil service way, they found a way of drafting themselves out of that problem. But it does focus the mind on all sides, on what is it this person is really responsible for doing. And they can't change that once it's done and signed.* [#327]

Although some would argue that nuanced civil service drafting was no longer 'an admirable professional skill' (Parry 2003, 5) it was seen by the SROs to be important in the way that their letters were constructed, and also in the way the Osmotherly revision had been phrased.[87]

> *That letter was a very nuanced series of words which could be seen to hold ministers to account, given their nature. The civil servant is told this is what you accountable for*

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[87] Precision is still regarded an essential element in government documents. For example, the subtle difference in the meaning of words such as *shall, should, may, might,* and *can,* is defined in a Cabinet Office guide to project delivery. (IPA 2018b, 2)

and if the minister changes it you are not responsible to your minister, but accountable

to the PAC, so the spotlight which was meant to be shone in one direction could appear

elsewhere. [#328]

The public project environment is one of frequent change, and to be held accountable for something, that 'something' needs regular redefinition. This was an area identified as a concern by SROs as their letters were seen to define the project definition, outcomes, resources, and timescales at one particular moment in time. Things may not change substantially over a few months, but many felt that their current project definition was no longer reflected in the details printed on their appointment letter and referred to in the discussions at that time. Conscious that they were being held accountable for 'something' and potentially in a forum as public as the PAC, this was described as needing attention, but was rarely addressed. It was seen as another aspect of the inherent ambiguity in these project roles.

Since it was first written there have been significant changes because of the new

Secretary of State, and the new White Paper, and that changes the requirements of the

portfolio within which the programme is sitting. It has changed quite considerably, and

so there is a lack of clarity in terms of filling in that SRO letter as to what exactly the

contribution of this project is to that broad departmental portfolio that what we are

being held to account for. [#329]

I think that process has taken a bit of time because we have a complicating

factor here on this programme, because last year I was involved in advising the

Secretary of State about the un-feasibility of the new shorter timeline for our

programme and we spent some weeks and months going backwards and forwards about

where the risks were and how big the risks were to delivery, and how we might mitigate

them, and after a lot of conversations we started to press on with the old timeline that

we had originally embarked upon. I have yet to sign mine. [#330]

In summary, the two themes which arose about the appointment letter were about its content and its negotiation. As an accountability mechanism it was felt to put pressure on the both the SRO and the department to create a pragmatic and deliverable set of project objectives, against which an SRO could be held accountable in a public forum. Negotiation of the letter was taken seriously but there were projects well underway where the letter had yet to be finalised. Nor was there much evidence that the letters were kept up to date with the changing environment, although this may be changing with the issue of the recent IPA guidance. The overall perception was that the letters themselves enabled a serious discussion between department and SRO about the project and what SRO accountability actually meant. For those who perceived Osmotherly as being to achieve departmental pragmatism about project initiation, this was felt to be a major step forward.

7.4 Using Osmotherly to manage multiple forums

The two interpretations described so far reflect the majority of the comments about the Osmotherly rules being a mechanism to apply pressure on either the SRO to work harder, or the department to be more realistic at project outset. Within the third group of SROs who felt the new rules enabled them 'to enforce clarity', some claimed the evidence of that was evident in its skilful wording. Their perspective was that the guidelines enabled the SRO to use the threat of the PAC hearing to force clarity onto their multiplicity of forums and the resulting 'MAD environment' they faced. For some, the PAC inquiry was sensed as more theatrical than investigative account holding, but nonetheless effective in some ways because of that. The 'fire alarm' approach to oversight described by McCubbins and Schwartz (1984) is effective because everyone else can hear the alarm and see the consequences.

It is because of the theatrical nature of an appearance at the PAC that the implied threat within the revised rules is useful for some SROs. They see the Osmotherly revision, and its inclusion in their appointment letter, as giving them 'visible accountability' which they can use as a mechanism to hold others accountable for providing clarity and definition in an otherwise ambiguous environment. This group of SROs felt that a simplistic external view of Osmotherly

was that the rules gave ministers and Parliament a strong mechanism, to impose the threat of a PAC hearing as the consequence of poor performance. But they described the reality of the way the mechanism was being used and portrayed within their own accountability environment as subtly different. They are using the potential of a PAC hearing, when they alone would be held accountable without a minister or permanent secretary to shield them, as a mechanism to get their forums to behave differently.

The *Rules* create a new authority for the SRO

The impact of this approach was most obvious when discussing different approaches to managing multiple forums. Bringing forums together to get agreement on what they wanted, and how they would then hold the SRO accountable, was the favoured method of dealing with forum confusion. Getting agreement from forums, even when they are together at a programme board, was described as difficult. But the threat of exposing this disagreement at a PAC, as a reason for project failure, was seen as a strong mechanism to get them to compromise.

> *I will refer to the letter. 'I am personally accountable to Parliament for this', is a phrase people will hear from me, because 'I am' personally accountable to Parliament for this and it can be effective. You have to use it in a countercultural way. A lot of people think they have decision-making powers on the programme, and you have to remind them actually I know who takes the rap for this and I am the one empowered and I will be the one talking at the PAC.* [#331]

In effect the SRO reverses the traditional forum as principal and SRO as agent relationship and demands that the forums are accountable to them and must present an agreed position. The SRO can use this authority at the programme board to drive clarity into the project objectives.

> *I can use the fact that I'm accountable for this to make some decisions and to bark some orders and to demand some things, which would otherwise be smeared across a number of people and dispersed and unhelpful.* [#332]

> *I definitely feel that as SROs we now have power and authority and I'm sure it makes a difference, and this may be supporting our position within the department, as opposed to being anything that creates a difference of perspective when interrogated by Parliament or the committees. So you know within the governance here… you're seeing where there might be a difference of view, the SRO is in a stronger position and the new governance creates the opportunity to bring the stakeholders together so there is a clear position.* [#333]

> *We're not being told what to do necessarily but the new governance creates the occasion, the opportunity and place to have the debate, and that letter gives more weight to me as the SRO within that discussion.* [#334]

On the other hand, for a few SROs, the newfound authority relied upon the experience of the official to exploit the mechanism and wasn't always perceived to be effective.

> *We've got one programme here where there is an SRO without the project background or expertise and they're frankly on a hiding to nothing, so the SRO letter doesn't really help them.* [#335]

The authority enabled the SROs to be more resilient about changes in their programmes. As described earlier, there were many occasions where things had been changed but SROs just had to accept these alterations and carry on. The exercise of creating an agreed position when the letter of appointment is issued, followed by the implied ability to inform the PAC of any changes, gave them a strong position when discussing new priorities with ministers.

> *So some of us welcomed it as we saw that as actually…'I am an SRO and I know what an SRO needs to do' and I'm very often constrained because of the politics of ministerial objectives, policy change, organisational change, you know anything that comes in that affects me being able to deliver the project, and which I don't have any influence over, but I'm still accountable. I'm now been given a bit more of a structure and framework which I can refer to and say hey! hold on a minute this is what was said, this is what I signed up to a year ago, and I only agreed within these parameters.* [#336]

When ministers or others decide to change the goalposts I can say 'well I said I would deliver this based on this context but if you now want me to do something different we need to renegotiate', or if things don't happen the way they should happen against the plan you can go to the Minister and say what do you want to do about this as I need to seek a directive from you, and that becomes part of the public conversation about 'well I got directed to do this' so it's all interesting ways in which the term 'what I am accountable for' starts driving the behaviours of project delivery. [#337]

<u>Achieving clarity and minimising intervention.</u>

The revision is not just about resisting change to projects. The rules allow SROs to achieve clarity at the initiation of their project, in a way that was not as easy before the revision, and to enforce clarity during implementation. Clarity is an essential characteristic within project management. The government's project delivery guidelines (IPA 2018b, 33) describe the purpose of a project portfolio strategy as providing 'total clarity to all stakeholders regarding the content and long term objectives of the portfolio'. It was frequently felt to be lacking and the Osmotherly rules are perceived to have helped resolve this.

I don't know anyone who is not happy about them. It's not that people are not going to be accountable for things, if you give me a project and write down and tell me what I'm to do, I can get stuck into it, it's when there is fuzziness it's very difficult to be accountable for something when you don't know what it is. [#338]

We were in a high-stakes business where absolutely clarity about what's happening was really important, so being clear about whether we were on or off track, wasn't nearly as big a deal in the policy world, but it's really important here. [#339]

Well I've got this new letter and can use it to get some real clarity about what I'm expected to deliver. I say I'm accountable for this, or accountable for that and I have my letter and that does work. For example, I needed to employ some advisers, but had to do it by circumventing Cabinet Office processes which normally take 10 days, but in this situation you can't wait for that, so to move things on I decided I will do it

just by saying I'm accountable for this, go to the Perm Sec and say 'look I'm
accountable for this, and this is what I'm going to do.' [#340]

> *It is pretty much an extra layer of clarification for what would otherwise be just*
a performance measure that I'm expected to adhere to. [#341]

Getting clarity begins with the negotiation of the letter itself, and the conversion of a policy into a business case and into a specification against which an SRO can be held accountable. It is not just that departments have to be pragmatic about project expectations and resources, it is the ability of the potential SRO to ensure this debate takes place and draws in other connected forums.

> *The simple ritual of writing down that you are accountable and knowing that that is a*
public thing, focuses the mind in a different way than simply being told by the
permanent secretary that you've got a job and should get on with it. Because it does
make you question them about where the boundaries are for what you are accountable
for, and which other organisations have to be told to accept that. [#342]

The mechanism may not be regarded as having increased their likelihood to face an audit or PAC hearing, but the clarity it imposes on the system is welcomed.

> *If it was meant to create some kind of dynamic with Parliament, it hasn't. Because no*
one's ever come knocking. I think some of the things it does bring, which I think are
absolutely right, and where this department suffered a bit before ... there is now a
clarity of roles and responsibilities which I think is very helpful. [#343]

Whilst no SRO indicated they would consider mentioning ministerial intervention at the PAC, they did expect the new mechanism to limit the inclination of policy staff and the ministers to change the parameters of the projects once initiated. This effect was evident when explaining it to a minster or their private office. For most SROs access to the minister is via their private office, where they interact with the team of civil servants who manage the flow of information to and from a minister, control the diaries, and correspondence.

I did draw on my accountability letter and said well look, I'm responsible to Parliament. Effectively, I went through Dante's Inferno and the seven cycles of hell, I can never remember if it was seven or nine, anyway first of all, I alerted my Programme Board that we had a problem, so I put it on the risk register but said it isn't for this programme to sort out, because I knew the Treasury would be anxious and my Programme Board has people from Treasury, and from the Cabinet office, as well as my DG colleagues, from the department. I then went to the departmental executive team and explained to them the problem, to prove to them that I couldn't hit all of the dates, so basically, I was saying I can't go to scale and hit the timetable. I did that then went to the private offices and my ministers and explained to them that in the guidance it says that if any minister or official does something that changes the likely deliverability of the programme I'm to tell people, I will tell them unless you agree to some changes in this programme, and ultimately they did, so I think that's a really good example of the system working well. [#344]

I basically went with my Osmotherly accountability and said you've asked me to do this and you've added in a whole load of new scope and that won't fit the timetable, which of course sent the entire machine into a robotic 'does not compute – disconnect' collapse. In the end they did the right thing by extending the timetable, but it wouldn't have happened if I hadn't mentioned the PAC. [#345]

Although some of the SROs had worked closely with ministers on aspects of major projects, usually if they were having problems, few expected they would get much chance to confront their ministers about problems. A comment from the NAO illustrates that it is unlikely they will be able to use such a threat.

It is slightly ridiculous to think that any civil servant might threaten to go to the PAC and expose ministers. Even if they were to try and get to the minister to suggest it, they

> *would be rugby tackled by the permanent secretary as they tried to sneak into their*
>
> *office!* [88]

Making a reference to the new Osmotherly relationship, as an implied threat of exposing problems at a PAC hearing, is effective for some SROs with other forums. This may not have been the intention behind the revision, but for the SRO using it in this way the intention is less important than its interpretation and their capability to use it. From the interviews there is evidence that this approach has been effective in dealing with a range of forums, from colleagues in the department and their staff, through Cabinet Office and Treasury officials, to groups of minor and less salient forums brought together at a programme board meeting. It has assisted in the development of clarity at the outset of their time in the post and has enabled them to demand clarity at various stages as forum expectations have changed. It also acts to limit some forums from demanding new outcomes or changing project resource allocations. The effect for some SROs has been to change their accountability relationship with various entities from one of agent to one of principal, although none of them expressed it in such simple terms.

Conclusion

Whatever the original intention behind the revision of the Osmotherly guidance, the SROs that it affects describe a number of reasons that they think lie behind the changes. The original purpose is less relevant to them than how it is currently working. When evaluating the impact of the new mechanism there are two questions which arise from the interviews and analysis. The first is does it make the SRO '*more accountable*'. The second is are they using the mechanism to manage their existing accountability more effectively. These questions are appropriate whatever the intention behind the revision. There were three opinions about why the revision had taken place and whether the aim was to make them more accountable to

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[88] Interview with senior NAO official, 2019

Parliament, to make the department more accountable to Parliament, or to give them the ability to demand clarity from those outside the project.

If the intention had been to make them feel more accountable to Parliament, and to be more candid in their discussions at a committee, then it was not successful. On the other hand, the major effect has been to bring the SRO directly in front of the committee, rather than alongside and protected by a permanent secretary. It is felt to have been effective by the chairs of the PAC, although they feel that getting evidence from SROs could go further to aid their examination of projects. The SROs felt that when in front of committees they are reluctant to get drawn into discussing areas which would result in criticising their colleagues or their ministers. This has an impact on the way they see the 'whistle-blowing' aspect of the new rules. They regard the PAC as formidable and '*the ultimate accountability arena*' [#346]. The MPs are expected to be searching for binary answers to complex issues. They anticipate some political grandstanding, and the aim of the SRO will be to avoid embarrassing the department, their minister, or themselves. Their colleagues regard the event and the SRO's performance as theatre. The aim is to get through it and reputation will be enhanced by a good performance, batting off the questioning. Reputation, and subsequent career opportunity, will be damaged by a poor performance.

The Osmotherly revision may not be regarded as making SROs more accountable in terms of their behaviour, but it was regarded as changing the dynamic within the department when establishing the parameters of their accountability, and then improving their ability to manage changes to those parameters through the life of the project. With the new rules, where the PAC as a forum is perceived to have had an impact is in the way that SROs are able to use the threat of attendance to leverage their authority within the project environment. The theatrical nature of the PAC is an essential element of this threat. This functions within their ministerial relationships, senior management relationships, and with their wider stakeholder groups.

The GMPP environment was already perceived to be full of accountability but also felt to lack coherence. With the new mechanism, the accountability environment has changed, with

officials being given more authority and capability to demand clarity about the expectations of the different forums. This makes the official more capable of getting coherence from their multiple forums and limits subsequent change to the *iron triangle* of outcomes, time, and resources. Accountability may not be increased but is made more effective for the SRO. The Osmotherly revision was ostensibly about creating an accountability relationship between Parliament and the SRO. It has also led to two more. The first is an accountability relationship between Parliament and departmental ministers about the realism behind project initiation and resourcing. The second is the creation of a different set of 'reversed' relationships between the SRO and their often inconsistent and disagreeing forums. As some SROs showed me, on the Bovens' model schematic, the accountability relationship now seems to point the other way.

Chapter 8. Weaponising Accountability

There seems a point at which you get to know enough about Whitehall, that you see that Osmotherly letter as a tool for you, rather than a weapon against you. [#347]

I chose *weaponising accountability* as a working title as I drew together the conclusions from the earlier sections. During the early fieldwork it appeared that the idea of holding someone accountable was not just considered as a management tool (OECD 1995, Costa, Ramus, and Andreaus 2011) but was frequently being used as a weapon, to attack an individual or a group. Ministers could use it to attack what they saw as weak civil servants. Select committees could use it to attack what they felt to be ineffective departments. The public could use it to attack a variety of errant politicians, and numerous forums could use it to attack the project leaders at the core of this research. The Osmotherly revision was felt by many to be an accountability weapon pointed at the SRO.

Then as I interviewed more officials, I came to the conclusion, as explained in chapter 7, that in many cases the weapon actually points the other way. The SRO is able to take the mechanism of potential appearance at a select committee, the new weapon, and turn it around to point at all those who were seeking to hold them accountable. They point it at their fellow civil servants in the department, at parts of government in the Treasury or Cabinet Office, or even at their ministers. They are now requesting an account from their forums about what they expect from the project and the SRO. They are suggesting they would hold those forums accountable for agreeing with each other about the specific terms of the accountability under which they as SRO would operate.

These requests, in typical civil service fashion, were not outright demands, but delivered in a more nuanced manner. The mere hint that a PAC hearing might examine forum

disagreement or conflict was felt to be enough. If the forums failed to give appropriate agreement and guidance to the SRO, their possible sanction was exposure by the mechanism created by the new Osmotherly rules. This disagreement or lack of clarity could be described to the members of the PAC as a reason for project failure. I used the phrase *weaponising accountability* in a briefing at the Cabinet Office and was told how appropriate it was in summarising attitudes to the concept, and particularly the metaphor of turning the weapon around to point at those who had created it. I was told that the term had become more widespread in political and civil service jargon over the past few years and would therefore not be an inappropriate one to call the effect I was describing. It has gradually entered political discourse, and Poole (2017) described it as '2017's political buzzword'. Consequently, I have given this final chapter a title that sums up much of what I have been examining. A mechanism introduced by politicians to put pressure on civil servants may have limited success if it doesn't take into account the civil servant's professional values and relationships.   It may even be turned against them as a management tool. The impact of any mechanism cannot be fully understood without evaluating the internal perspective of the agent. Extending the original metaphor, I argue that when creating and deploying accountability as a weapon in an accountability relationship, it is important to know in which direction it may actually be facing.

My research examines how it feels to be accountable, and how public managers cope with their multiplicity of account holding forums. Within the five chapters of empirical research I have recorded and interpreted the perceptions of the SROs who are facing multiple account holders, and are learning to deal with the new Osmotherly accountability mechanism. The interviews provided answers to the questions about how managers prioritise multiple accountability relationships, and how they manage their potential overload. My analysis was then used to understand how they deal with a new mechanism which created a relationship between the SRO and Parliament. In this chapter I reflect on the outcome from the interviews with SROs. First I consider how understanding their evaluation of accountability forums provides insight into the way the new mechanism is regarded and managed.

The impact of a mechanism is mediated through the wider relationships with other account holding forums. This research illustrates the importance of understanding that environment when considering any mechanism, but particularly evaluating how it feels from the perspective of the agent and not just from the forum or the observer. This has implications for academic and popular conceptions of how accountability works, and I consider what the conclusions mean for accountability theory. It also has implications for reputation theory. This empirical study confirms the importance of considering reputation as a driver for the relationship between an account holder and account giver (Busuioc and Lodge 2017, 91), and the impact that such an interdependent relationship has on an agent's perspective of the salience of other forums. I show that adopting a reputational perspective, it is evident that for many SROs at a PAC hearing they are more concerned about the views of other forums, even virtual ones such as their professional peer group, rather than the members of the PAC. Finally, I address some practical applications arising from the research, and the impact for account holders and those called to account.

8.1 Assessing an accountability environment

The study of accountability draws on a variety of metaphors. Mixing two of them, the challenge in addressing the impact of a new mechanism is to examine the effect of adding one more thread to the existing web of accountability described by Page (2006, 170), in which each thread already has the chameleon quality described by Sinclair (1995).[89] To examine the impact of the Osmotherly revision I have argued that it is necessary first to evaluate the nature of the web itself and assess the way the officials view the 'chameleon-like accountability towards competing constituencies' described by Sinclair (p. 231), from their own point of view. Understanding how the accountable officials assess their forums, how they decide which are salient, and finally how they decide in what way to manage any conflicting expectations, is a vital precursor to evaluating the impact of adding one more mechanism.

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[89] The new Osmotherly thread would fit within the *legislative oversight* category in Page's model (2006, p. 171).

Identifying how they assess and manage their various accountability relationships addresses the prioritisation question posed by Hall, Frink, and Buckley (2017). It also addresses the request for empirical investigation into how managers deal with multiple accountability pressures posed by Yang (2012). Bringing those answers together it is then possible to evaluate the new mechanism. The analysis illustrates that the metaphor of a spider's web is particularly appropriate, as adding one new mechanism, pulling on one particular thread, has an impact on many others. The Osmotherly mechanism can be seen to have an impact on the way in which various forums behave; the NAO, the PAC, ministers, permanent secretaries, and the SRO's peer group. Mechanisms do not act in isolation and cannot be properly understood unless placed within their overall environment and assessed from the perspective of those they are proposed to act upon.

Forum salience and prioritisation

To manage the workload involved in dealing with a multitude of forums the SROs prioritise the accountability demands and to do that they must assess their salience. They do this by evaluating them using relevant attributes in an assessment which can take the form of a structured process or a brief informal and review. For most this was an intuitive process which enabled them to prioritise their account giving effort. Drawing from stakeholder theory (Freeman 2010, Mitchell, Agle, and Wood 1997) I described a model of forum evaluation based on the analysis of groups of attributes arising from the interviews. The first group is authority and comprises power and legitimacy. The second is interest, which includes focus and expertise. The third is likelihood and contains expectation and immediacy. Forum salience is derived from the combinations of these attributes and a typology for stakeholder salience was proposed. The typology and attributes were discussed and validated in the interviews and in follow up discussions with SROs and staff from the IPA. This model, and the approach to assessing salience, may have wider applicability in other domains with extensive networks of accountability relationships.

I set out four strategies that SROs may use to manage multiple forums. The most frequent approach was to try and get forums to agree on their requirements, either in pairs or in large groups, and the programme board was identified as the most significant collective forum where this could be achieved. A second approach was for the SRO to prioritise their activity to favour those forums they felt most relevant, based on their own assessment of the situation and their experience. The two other approaches, offloading or responding as a demand arrived, were used by some, but infrequently. Many senior managers have experience of some form of stakeholder assessment, even if it is just a mental map of key institutions. It is therefore a modest transition to adopt a process of mapping accountability forums to provide some structure to the network of accountability relationships. In the later meetings with officials, using the typology and the forum attributes, it was a simple exercise at the end of an interview to use the mapping process to probe the salience of forums and how they were managed.

Some of the institutions to which SROs described feeling accountable seemed to be very unlikely to be able to demand such an account. These deemed, or virtual, forums had no discernible accountability attributes. The taxpayer as an individual rarely has the authority or expectation to demand the SRO delivers them an account. Most SROs are unlikely to ever deal with the individual taxpayer or even the user of some of their projects. Yet frequently I was told that the SRO felt as if they were accountable to these groups, and that they behaved within their projects as if there was a virtual forum, *looking over their shoulder*. Similar feelings were expressed about the cohorts of colleagues from their MPLA courses, or other SROs across the spectrum of past and present GMPP projects. They might have the expertise but certainly no authority or likelihood of demanding an account. There was no sense of there being an accountability mechanism delivering judgement and sanctions here, other than some emotional and reputational aspect. This values based response, founded on a sense of ethical behaviour and integrity, may match some of the 'asserted promises' of accountability described by Dubnick and Yang (2011, 172) but may not match the expectations of the ministers calling for more accountable SROs. The accountability *felt* by the official, rather than mechanisms being imposed, highlights the juxtaposition of values-based accountability and sanction-based

accountability in this environment. They were largely inseparable in evaluating personal perceptions.

The impact of Osmotherly on the SRO

The new mechanism joined an already busy accountability environment and it has become enmeshed into that wider network. There were differing opinions on the intention behind the creation of the new mechanism. I didn't start out by asking what people thought it had been meant to achieve, but this was gradually covered in the discussions.[90] I asked about how it worked and how SROs felt about the relationship. For the SROs it was irrelevant why the changes were originally introduced as it is more important how it works and what change it has brought to their overall sense of being accountable for their project. Some of this change may have been unintended because of the other mechanisms already there. For many accountability relationships, the environment is too complex for one mechanism to be particularly effective on its own. In the hectic accountability regime inhabited by the SRO, the new relationship is just one amongst many and must take its place in the assessment of its salience at any time along with all the others. For many officials it didn't make it high up their list.

But that doesn't make the Osmotherly rules ineffective. It is a question of what effect they have had, and this is seen far removed from the select committee chamber. There are three opinions about what the accountability relationship with the PAC, bypassing ministers and the permanent secretary, has done to the role of the SRO. No single view was predominant, but many felt it was to put pressure on them to perform and be more diligent in achieving whatever outcomes they had been set. This would suggest it is perceived as a mechanism, with the PAC in the role of forum/principal and the SRO as agent. Agency drift due to external pressure could be exposed by the 'reporting intervention' clause, although as reported, no official contemplated

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[90] As well as the SROs, I spoke with individuals who had been involved in the drafting of the rules, the minister's statements, and advice on the guidance. There were differing opinions on the original intent, and some opinions altered during the course of the fieldwork. Tracking the creation, introduction, operation, and subsequent evaluation of a mechanism, and the perceptions of those involved, could be an interesting longitudinal research topic.

such exposure.   These SROs felt the weapon was pointed straight at them. It wasn't designed to get an account but was designed to make them work harder to deliver the project, in the hope of avoiding having to actually give an account.

> *Osmotherly is actually about making us more diligent, it's not about going to the PAC. It's about pointing at us, and saying we should be trying harder, so that we won't have to go.* [#348]

A second group felt it was designed to put pressure on the department, to force them to establish pragmatic and deliverable project outcomes, and the relevant accountability relationship being created is between Parliament in the form of the PAC, and the department and its ministers, with the SRO letter being part of the mechanism.

> *The new rules aren't directed at me. They are directed towards the department. I think the aim was to get departments to get their act together about what could actually be achieved and not just take policy and chuck it at a project and say do this. I don't think they are really aimed at me as much as at the department as a whole.* [#349]

A third group felt the process had been particularly effective in enabling them to cite their Osmotherly letter, and accountability to the PAC, as a means of demanding clarity, direction, and inter-forum agreement, from all those expecting to hold them to account. To them, Osmotherly is a mechanism which appeared to have been imposed to make officials more accountable, yet actually enabled them to push back and demand accountability from those tasking them with the role. A weapon that they felt was designed to be pointed at them, has been handed over and is now being pointed at others.   They use the threat of a PAC appearance to ensure their forums come together to agree on their expectations for the project and for them as SRO. This is particularly evident in the use of the programme board as a location and event to bring competing expectations together for resolution. The SROs use this approach with ministers and senior officials.

> *It seemed as if it was there to impose on us, to give our masters a lever to use to get more out of an SRO, but it is actually enabling me to push back and demand more from*

them. They look down at me and say I should do it better or I will get hurt, but I can look back up at them and say give me better guidance and give me the right resources or both of us will get hurt. [#350]

What becomes apparent when examining the perceptions of the SROs about the new relationship is that it is necessary to understand the complexity of an existing environment to assess how a new mechanism might work. It is also necessary to get their internal perspective. Drawing together the interconnected forums and considering how they are affected illustrates the impact of the new mechanism. The NAO, ministers and many departmental and government organisations are all subject to the various effects created by the new guidance, not just the SRO and the PAC. This study shows Osmotherly is just another, albeit important mechanism, applied to an SRO but is actually more effective in its use elsewhere, rather than 'account giving at the PAC'. But then that may have been the intent all along.

<u>A theatrical PAC highlights SRO accountability</u>

If the PAC is often regarded as theatre, as described in chapter 7, then that may not be detrimental to the impact of the new mechanism. The theatricality itself adds to the strength of the SROs case when demanding that forums provide clarity about what they want from the project and how they intend to hold the SRO accountable. Public project delivery needs the detailed audit and inspection that is carried out by the NAO. The NAO needs to have behind it an institution like the PAC that is perceived to have authority, and which is perceived to hold the individual and the department to account. If the PAC was less dramatic and therefore less visible to all those involved, it may lack the impact as an account demanding arena. In this respect it could be argued that the theatricality of the committee hearing is almost the most important aspect of their calling an SRO to account.

There will be few civil servants, or ministers, or anyone else close to public project delivery, who are not aware of the committee hearing process and the image of the grilling that an SRO can get if their project is in trouble. The theatrical nature is evident in the way that

SROs described the process as *'gratuitous violence', 'wanting a head on a stick',* or a *'hapless individual ritually disembowelled'.* A quiet, scholarly, and private review, even if it was with an expert forum, would lack the impact that the PAC can create. The ritual of the PAC and the performances of the MPs, the auditors, and those civil servants present are an essential part of the event, as Sharma (2007, 305) notes. It is the ceremony and performance of a public committee that makes the thought of being exposed at a hearing something to fear (Goffman 1959, 81). It is the potential of having to perform on this stage, and in doing so mention those who have adversely affected the project, that gives the SRO the weapon he needs to turn towards his account holding forums. If the threat of being named at the PAC, and mentioned as a problem, is sufficient to get forums to provide clarity then the existence of the mechanism may be enough, rather than its application, to achieve a positive outcome. As the chair of the PAC noted:

> *SROs should be concerned about appearing at the committee. It should encourage them and the AO to be across the detail of their projects. If they know it might happen then they have to take ownership. It should give the SRO authority in the department to say what they need to, to their permanent secretary and ministers.*[91]

While civil servants might claim that their *omertà* would never allow them to name-drop in a select committee, their account holding forums must always consider the risk that in extreme circumstances they may do so. The theatrical nature of a hearing makes this a possibility, in the way a less dramatic setting might not. So, the new rules, and a theatrical PAC, give the SRO a strong capability to turn to their account holders and demand clarity. The mechanism may look as if it was designed to create accountability from the SRO to the PAC. I argue that it has created accountability from many of the other forums to the SRO who has now become the account holder. This action, reversing the mechanism and demanding clarity, is not an attempt to avoid accountability but as an intrinsically motivated agent they are acting to

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[91] Meg Hillier (chair of the PAC), in discussion with the author, 2020

overcome some of the deficiencies within principal-agent relationships which have given rise to inefficient definition or delegation of the overall task to the SRO (Gailmard 2010, 39).

8.2 Implications for theory

This empirical investigation of SRO accountability has shown the importance of understanding the agent's perspective when evaluating the environment, their accountability relationships, and mechanisms. Accountability is facilitated or moderated by the other relationships and the constraints experienced by an individual. Understanding the internal perspective is a prerequisite to evaluating the impact of a mechanism. It is also necessary to establish which entities are acting as account holding forums and how they interact. When describing the concept of accountability, Bovens questions to what extent a particular social relationship can be considered an accountability relationship (2007a, 460). The evidence here confirms that is a question which ultimately should be answered by the agent, rather than the observer. SROs described feeling accountable to entities that would not pass as forums to an onlooker, and behaved as if they might expect to be called to account. Other forums which appear to be prime candidates for selection as a salient forum had less impact when the attitudes of the SRO were explored.

Similarly, when evaluating a mechanism, it is evident that it doesn't operate independently of the environment into which it is placed. Some have a range of possible outcomes, as illustrated by the Osmotherly revision. The outcome was not uniform across the target community and for some an imposed accountability mechanism became a tool to help them manage. The accountability environment is complex and those introducing mechanisms may have a different perspective to the agent about the values and relationships which are significant. When describing mechanisms and their effect I suggest it is important to understand not just how they are perceived by an agent, but how that agent can then manipulate and use them.

Much of the discussion on accountability treats it as exogenous to the actor and the analysis here has shown the relevance of Yang's appeal for endogenous inquiry (2012, 256).

As well as validating that request, this investigation of how SROs assess their environment and deal with it has further implications for accountability theory. The SROs' commentaries validated Bovens' (2007a) model as one which they recognised and felt appropriate for their situation. The perception of accountability was of a social relationship, and supports the information, debate, and judgement, phases described by Schillemans (2013). The SROs' perspective on *judgement* led to the exploration of sanctions and the importance of personal reputation. Some of the forums facing the SRO may not even consider themselves to be acting as account-holding entities. However, from the SROs perspective, even those forums that were aware of their salient position had often failed to define the core elements of the accountability relationship. There was rarely a definitive statement of the constituents inherent in the mechanism, the 'who, what, how, and why'. Many of the individual relationships felt ineffective to the SRO, for both the account holder and the account giver. Ineffective but also very time consuming. The descriptions of how it feels to an accountable official support the analysis of discrepancies between empirical research and principal agent theory described by Schillemans and Busuioc (2015, 200). Whilst principal-agent theory can provide a general model for accountability relationships this research confirms it is only partially applicable because of the multiplicity of principals whose requirements the SRO is trying to balance.

The research addressed the question raised by Yang, about how public managers perceive, order, and deal with multiple accountability pressures (2012, 266). I have determined how one group of accountable managers experience and cope with their overall accountability, and deal with a new mechanism. The research supports the view expressed by Schillemans and Overman (2018) that felt accountability consists of three basic dimensions related to expectation, legitimacy and expertise and described here as authority, likelihood and interest. The terms are used to express different aggregations of characteristics rather than expressing new directions. It is evident from the interviews that accountable individuals prioritise their response to their accountability relationships and that the salience of their forums matters when assessing this felt accountability. The need for empirical investigation into how prioritisation

works in practice was identified by Hall et al. (2015, p. 209), and further empirical investigation may validate the typology developed here.

The relevance of reputation

This analysis advances the understanding of how accountability relationships are affected by perceptions of reputation. This applies to both account holder and account giver and their personal considerations of the wider environment. The impact of reputation is relevant to the interdependent accountability relationship between them, but also to their assessment of the multiplicity of audiences that act as their own forums. SROs use a reputational focus to assess the salience of their forums against a series of attributes. This has an impact on their perception of forum power, legitimacy and expertise. Forums that exhibit more competency against Carpenter's (2010, 46) organisational dimensions of image; performative, moral, technical or procedural, are regarded as having more reputational credibility and therefore are felt to be more legitimate when acting as an account holder. Recognising the concern for reputation can explain an SRO's attitude towards forums which appear less important to them than might be anticipated by the forum itself or an external observer.

It would be misleading to describe the new accountability relationship between the SRO and the PAC as unimportant, or just another forum to which an account has to be given, but reputation plays an informative role in understanding this environment. The PAC is clearly recognised as a significant institution with considerable power within the public sector environment. Yet SROs described watching colleagues with '*disastrous projects'* doing well at the committee and others without such major problems being less effective giving their account. Most SROs hoped to avoid a hearing but if they made an appearance, they didn't expect it to be challenging their project management so much as their ability to manage a performance at the committee.

> *You have to think of the PAC as a parliamentary body. Like ministers at the despatch*
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> *box, its often more about how they perform than what's actually happening in their*
>
> *department. Some of our ministers have a wonderful reputation for not answering*

questions yet sounding great in the chamber. I suppose it's basically the same for us at the PAC. And just like them, none of us ever blame the Treasury for anything. [#351]

The potentially ambivalent attitude of SROs becomes easier to understand when considering how personal reputation plays into their perception. Using a reputational focus helps explain their attitude and was particularly evident in their response to the new Osmotherly rules and the PAC. Their description of committee appearances support Busuioc and Lodge (2016, 247) who argue that both account giving and account holding is about managing reputation for specific audiences. SROs consider the committee members' audience to be their fellow MPs, their political party, or the wider public. For SROs themselves it is their colleagues in the department or across the senior project community, and particularly their permanent secretary. The sanction available to the PAC is damage to reputation. The '*Stalinist show trial'* or '*gratuitous violence'* describes the theatrical nature of the event, and may be bruising, but the real fear is of delivering a poor performance in the eyes of your colleagues.

Chapter 7 opened with the words of an SRO referencing the omertà they identified as part of their public sector ethos. There are contrasting opinions regarding the survival of a public sector ethos in modern public administration. The historic notions of civil service integrity may seem incompatible with the controls and accountability mechanisms introduced over the past few decades, and as Carr (1999, 1) asserts, public service values may have been the hallmark of the civil service in the past but it may no longer be appropriate to place too much emphasis on the personal ethics of the individual. However, a values-based approach to accountability is evident from the discussions with SROs, as is their recognition that they inhabit an environment replete with audit, controls, and reporting, with the hint of sanctions, albeit ill-defined, in the background. Politicians are exposed when major projects fail, and may feel that demanding more accountability is an effective way of solving some of their problems. Such demands are likely to be ineffective if the values and relationships of those they are aimed at are very different. If the public sector ethos they encounter is that of the officials' omertà in the face of a select committee, then as Heywood (2012, 489) notes, this clash between a

positivist approach using performance measures and the qualitative measures of impartiality, trust, and fairness, may encourage a dysfunctional outcome, despite the intention of the Osmotherly rules.

Getting a different outcome from the investigation

This research attempts to understand the way individuals feel about being accountable, and provide a dispassionate perspective. Might it have been possible to get a different result using a different methodology? The study relies on interviews, and the reasons for choosing interviews over other methods of data collection, and the inherent problems with credibility and bias are addressed in the annex on research design and methods. It is possible, although I consider it unlikely, that a different selection of SROs may have given a different perspective. I didn't select particular departments or types of project. It was challenging enough to get SROs from any department to give up their time for this research. There was considerable consensus, across the SROs that took part, about the concepts and their application to their situation. I was able to speak to a number of project directors and others at the level of DG or permanent secretary and although this wasn't triangulation, their comments supported the opinions of the SROs. I was also able to confirm the sense of the outcomes by presenting them to other senior officials from the IPA at Project X workshops in the Cabinet Office. On the other hand, extending the research into potential differences between perceptions of different groups of SROs, perhaps between the largest projects compared to smallest, or infrastructure compared to IT, or defence compared to health, might have exposed some variation.

The use of the schematic is where a different approach may have led to a different response. It was used to avoid spending much of the interview evaluating the participants' understanding of the concept, and to use the time to ask how they felt about being accountable. There was no particular evidence that the chosen schematic forced a frame onto the participants and care was taken during the analysis to be alert to any framing effects. The schematic was based on Bovens' *consensus model* from the literature on the concept and was basic enough to provide an overview whilst containing aspects of a variety of authors' perspectives. It didn't

appear to guide the conversations although individuals did use it to help describe certain aspects of their perception of the subject. On the other hand, it is impossible to be certain that the schematic had not in some way influenced the response.

A different approach might have dispensed with the model and allowed the participants to start from first principles, and describe their roles and feelings about the being accountable, much as Lupson (2007) and Sinclair (1995) did. It could have been an opportunity to consider any differences between those who had attended the MPLA, and had discussed the concept, and those who had not. I didn't have access to that information when planning the interviews, and with a self-selecting group of candidates it may not have provided a representative sample anyway. There might be an interesting line of research in examining the perspective on accountability of those SROs newly appointed to the role compared to those who have undertaken it for some time or have been SRO for successive projects. The size of the community of experienced *Osmotherly literate* SROs is now larger than it was when this programme of interviews started and might sustain such a follow up inquiry.

There is no typical SRO although there are similarities. They are normally members of the SCS, although some had joined from the private sector rather than through a full civil service career. They are mostly male, with just 16% female over the research period. There is no standard amount of time they devote to being an SRO, as opposed to their day job, and that varied from 100% to less than 10% amongst participants. The 47 interviews with SROs represents over 25% of those available from the 171 projects in the 9 departments where I conducted interviews. The interviews covered 17% of the 274 projects on the GMPP list across all departments over that time. A much wider programme of interviews might have provided a different range of opinions, although there was substantial consensus from the existing interviews. Other areas which could have yielded different outcomes might therefore include variations due to gender or experience in the SCS.

A longitudinal study investigating how an SRO views their accountability before taking the role, early in post, and then some time later, perhaps on project completion, might identify changing perceptions that come with experience or the specific phase of the project. Additional

areas which could provide a different perspective could include the views of the project directors as those held accountable by the SRO, or the views of permanent secretaries as one of the SRO's most salient account holders. Similarly, as more SROs face the theatre of a PAC hearing there might be more to examine in those specific events. However, in the time available, both to researcher and participants, I believe the findings are an effective representation of what it feels like to be accountable as an SRO at this stage in the use of the latest Osmotherly rules.

8.3 Practical implications, impact, and future research

The research was undertaken with the approval and support of the Cabinet Office, in particular the IPA. It was subsumed into the wider GMPP research programme of Project X and has become part of the work in a theme examining assurance, reporting and governance. There has consequently been the opportunity to discuss the work with staff in the IPA as the outcomes have developed. Some of this was to validate the findings, to ensure there were no obvious oversights or mistaken conclusions arising from the data. The IPA also used these discussions to identify practical applications for the work within the major project environment, as agreed when setting up the research agreement in 2016. Some of the findings may have immediate application within the oversight activity of the IPA. Providing an independent perspective of the SROs' perception of their accountability, particularly in relation to the Osmotherly revision, may enable the application of the guidance to be more effective.

Developing Osmotherly and SRO accountability

Arising from the research are a number of activities which may be relevant to the governance of GMPP projects and the role of the SRO. The SRO may be the accountable face of a project but there is still a feeling within the PAC and the NAO that they are sheltered behind the permanent secretaries and are not as effective as they could be.

> *There appears a worrying group think sometimes, within departments and their project*
>
> *teams, and SROs may not have the authority or independence to stand up to a Perm Sec*
>
> *or minister who feel that just pushing on enthusiastically gets a project over the line.* [92]

Some SROs described using non-executives with substantial external expertise, or equally senior colleagues in other departments, to provide a countervailing narrative to overcome the resistance of the department to recognising the severity of problems when accounting for the project. When part of the accountable role is to alert departments to problems, which may then expose them to public scrutiny, it may be in conflict with the collegiate norms of behaviour or the public service omertà described earlier. Investigating the ability of the SRO to push back against overly enthusiastic senior officials and politicians, conscious of the reputational concerns of all three groups, might be revealing.

Other aspects described by the SRO role reflect the involvement and concerns of the IPA. The need for the accountability letter to be regularly reviewed and updated chimes with concerns that the IPA had expressed but now provides external validation for that opinion. The programme board was identified as the principal institution for assembling account holding forums and attempting to get agreement about what they wanted the SRO to be accountable for, how, and why. The various descriptions of the board and its use may provide an incentive for further strengthening of that body with a formal remit mandated across the GMPP. Membership and purpose are still unsystematic across different departments, and the role, structure, and authority of the programme board is likely to be a fruitful future investigation.

Experienced project managers are still an unusual commodity within the civil service. The value that participants ascribed to their professional peers was notable within the interviews and the existence of the MPLA cohort as a virtual forum links to the reputational frame that SROs have about their accountability generally. Whilst I haven't attempted to validate the specific programme curriculum or content of the MPLA, this should support the value of such networks within government. If SROs feel a sense of accountability to their peers, which

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[92] Interview with senior NAO Official, 2019.

results in increased diligence toward their projects, then this virtual forum is effective. It may be worth taking this further and strengthening the subsequent links between SROs in wider cross government GMPP based activities. Undertaken carefully this could provide positive enforcement to an SRO experiencing concerns about their project, but would have to avoid reinforcing the *group think* that concerned the NAO.

The role of the IPA stands out as one area which would warrant investigation. The comments about the IPA scrutiny of projects varied from very positive to very negative, often based on the individuals that the SRO encountered. Building on the investigation here, there may be merit in further independent investigation of how the SROs and project directors feel about the effectiveness of the routine audits, interventions at programme boards, or general support provided by IPA individuals. Much appears to depend upon the expertise and the experience that the *visiting* IPA staff have in project management generally, domain expertise specifically, and exposure to both policy and implementation within the public sector. Ascertaining what would turn the SROs' comments from negative to positive, and enhancing the IPA role as a salient forum, might provide evidence to identify improvements to the IPA's support for project leadership across the GMPP. The possibility that the IPA might provide very senior and independent expertise to support an SRO in discussions within departments was cited on a few occasions by officials facing challenging departmental dynamics.

Application across the wider public sector

Finally, I need to address some aspects of generalisability. The first is about the timing of this research. This study took place over the period from 2016 to 2019 during which the UK embarked on a process to leave the European Union in what became known as Brexit. The epilogue describes some of the impact this may have had on the participants, on the research, and on its future transferability. The second aspect is to consider its application within a specific population. The aim of this study was not to examine one community so that I could generalise from the sample to a population outside the GMPP. I would argue that the sample size supports the outcomes being generalisable across the wider GMPP group of SROs. The

context was to investigate SRO accountability generally and the application of a specific new mechanism applicable to that community. As there is substantial variation between the various accountability mechanisms, even within a particular environment, the analysis of 'Osmotherly' is clearly limited to that specific situation.

However, the adaptation of stakeholder analysis and the creation of a forum typology is not specific to any particular environment. Wherever there are individuals facing multiple forums, a similar analysis could be undertaken. The attributes may vary, depending on the circumstances, but those here are likely to be relevant for roles within public sector environments. The research may also have application outside the UK. Other parliaments have similar oversight committees although their accountability regimes operate differently. Few have as powerful an audit body, independent of government, allowing their parliament to hold their government executive to account in such a public manner. In Canada, the 'House of Commons Standing Committee on Government Operations and Estimates' can investigate and report on the management and effectiveness of operational activities within departments. (Lodge et al. 2013, 105). Similarly, the Canadian 'Standing Committee on Public Accounts' has 'the capacity to conduct performance audits that examine government management practices, controls, and reporting systems' (Parliament of Canada 2019). In Australia, the 'Joint Committee of Public Accounts and Audit' has a similar remit (Parliament of Australia 2019) and their senate select committees can hold senior officials to account during estimate hearings (Lodge et al. 2013, 103). Comparable institutions exist in a variety of legislatures that derive from the Westminster model. For those with public hearings, and subsequent media exposure, any theatrical nature may be just as relevant in these different national environments. Evaluating the mechanisms which apply to those officials held accountable for major project expenditure within these parliaments would provide an interesting comparison with the impact of the latest Osmotherly guidance in the UK. Local cultural variations would have an impact but assessing the salience of account holding forums and the nature of those public committees could provide an insight into the effectiveness of holding the executive to account.

Conclusion

This research has addressed the accountability of one particular group of officials, and then the introduction of one particular accountability mechanism. It has implications for the study of both accountability and reputation. In particular it reinforces the recommendations of those studies which suggest accountability must be considered from the perspective of the agent, and not just the forum or observer, if its effect is to be understood. It also has relevance for popular conceptions of how accountability works. The use of accountability mechanisms is so widespread that there are few organisations of any size that do not have multiple account holding institutions attempting to hold individuals to account. Using the approach taken here, assessing the perception that the individual held accountable has of each of these forums, and mapping their salience, could provide insights into their management of the complexity of their accountability in many situations. If nothing else, the analytical approach may provide a degree of clarity for an accountable individual labouring under the attention of many account holders.

Finally, as noted earlier, there is considerable merit in understanding what any new accountability mechanism is intended to achieve, from the internal perspective of those it is expected to affect. Returning to this chapter's original metaphor, if any forum is expecting to use a mechanism as a weapon, even more important than knowing what it was originally meant to do, it is vital to find out what it is actually achieving, and for that you should find out in whose hands it has been placed, in which direction it really faces, and who controls the trigger.

Epilogue

I wonder if anyone will still be talking about being accountable in a few years' time. The word is getting a bad press these days. [#352]

This comment by a senior civil servant in late 2019 was one of several questioning their attitudes towards accountability. The fieldwork for this research was undertaken during the period from 2016 to 2019 during which Whitehall was increasingly dealing with the impact of the EU Referendum that took place on 23rd June 2016. The final interviews occurred during early 2019 and some meetings with officials to confirm aspects and validate findings took place in late 2019. The Brexit process, as the UK discussed the terms of its withdrawal from the EU, had no significant impact on the projects undertaken by most of the SROs I interviewed, although it became increasingly something that they referred to over time. There was also an increasing debate about politicians and media being held to account, or not held to account, and about their comments and their behaviour.

This discourse on the perception of accountability during the fieldwork has two important aspects. The first was the gradual distraction that affected the SROs as they were drawn into Brexit based issues within their departments, which particularly affected some departments such as the Home Office. The second saw some expressions of frustration by officials referring to an environment in which they felt accountability was regarded as an optional rather than essential part of the political landscape. These views may have little impact on the experiences described in this research, but they may have an effect in the future, and should be considered when reflecting on this work.

Brexit enters the discussion

The fieldwork began in 2016. Over the following two years there was little discernible evidence that Brexit had any impact on the interviews and comments by SROs. None of the projects created by the government to assist with leaving the EU were part of the GMPP list. There was some infrequent discussion about the challenges facing their colleagues within the Department for Exiting the EU and officials used that as an example of the problems facing SROs.

> *It's important at the start of something like Brexit, to ask has Ollie [93] got himself clear what he is responsible for and what he isn't. I bet he hasn't, because they will just have said 'come and can you try and do this', and that's a bit like some programme project start-ups feel like. They go 'we've got to do this, come on your ball is being kicked up the pitch, run after it' when actually that should never happen. Like nobody says to an accounting officer when they take over a department 'could you just go on for a while and I will come back to you about your financial accountabilities later'.* [#353]

The change of administration following Prime Minister David Cameron's resignation in June 2016 caused a few SROs to describe the problems a change of administration caused to their programmes.

> *We got an agreement in the week before the Brexit vote, we then get the vote, and a very quick collapse of government, and we weren't expecting it quite as quickly, but then the Conservative leadership campaign collapsed very quickly and we got a new prime minister and needed a new set of approvals, which delayed everything once again.* [#354]

Apart from comments like these, there were few Brexit-based accountability comments during the interviews over the first of Prime Minister Theresa May's ministries from July 2016 to June

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[93] Ollie Robins (now Sir Oliver Robbins KCMG CB) was appointed Permanent Secretary at the Department for Exiting the European Union in July 2016. These comments were made by a colleague after that appointment.

2107. Then another election in mid 2017 caused a few further delays for some programmes, but with the same party in government there was little evidence of any major change affecting attitudes within the interviews. Reviewing the transcripts and interview notes from the meetings up to late 2018, the SRO's attitudes to their accountability for their projects are appropriately reflected in the findings described in the thesis.

Whither accountability?

However, over the period from late 2018 through to the end of 2019, some SROs and officials began to reference accountability in relation to the Brexit process. This was usually outside the formal interview and in the parting comments. It didn't happen in all the meetings or interviews, but it was referred to enough to be worth noting. They described becoming frustrated and therefore sceptical of a system in which they described *increasingly unaccountable* politicians demanding that everyone else, including civil servants, was meant to be accountable. Their comments referred to ministers appearing in the media and refusing to be accountable, or parliamentary business and debates in which they felt politicians of all parties were able to avoid accountability. This was contrasted with the way they felt politicians were felt to demand that their civil servants or public officials were held to account. Their feelings were echoed by a senior BBC commentator who noted that neither the prime minister nor leader of the opposition were prepared to be interviewed on what the BBC refer to as their *accountability interviews*.[94]

As the research here drew to a close, various examples of this issue appeared in the media where a lack of accountability by politicians of all parties was described as a concern. Some participants drew particular instances to my attention. They expressed concern about whether or not this was an indication of change within the accountability environment of the public sector. They felt accountability was being avoided by those who represent a significant account-holding institution. They noted that if it became a general perception that

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[94] Interview with senior BBC journalist, 2018.

accountability was regarded as irrelevant or of less significant within political discourse, then this could have an impact on the public administration environment of the officials who those same politicians expect to hold accountable.

> *How can you take the accountability clause in your Osmotherly letter seriously and worry about select committees when you see our masters ignore the concept all together? I will still do this job as well as I can, but I don't feel I do it for them anymore. Some of the ministers here seem quite happy to be strangers to the truth yet I am expected to be hung out to dry if this programme goes off track and I don't tell everyone about it at a committee. It becomes increasingly easy to say to yourself that they don't have the right anymore to demand I am accountable if they see it as not applying to them.* [#355]

> *There's no shortage of people screaming about accountability. It gets confusing when they don't seem to want to be held to the same standards. Our minister is dodging the issue on one matter, and his opposition in the house is avoiding saying what they would do. Neither can be held to account. If I took the same route I would be taken out of here very quickly. It's all a bit disappointing really but makes briefing the minister's team interesting when they're trying to hold me to account.* [#356]

Whatever the motive or strategy for politicians seeming to avoid being held to account, it is relevant that many of these comments occurred during an election campaign and are not necessarily representative of political or public sector accountability in general.

I am certainly not forecasting the end of administrative accountability in the UK civil service, but I question whether or not a study like the one here would elicit the same comments about the concept if undertaken over the next few years. The national discourse about public sector accountability may change as we move through the post Brexit process and the aftermath of the 2019 general election. It could become more or less significant. In a further twist, media reports in early 2020 described the potential for the cancellation of a 'swathe of projects' (Swinford 2020, Woodcock 2020) in which some of the GMPP list are referenced. This may have little impact on the perception that SROs have about their own accountability, but further

indicates that potential major shifts may take place within the environment of major projects in the UK over the next administration.

My research examined the perceptions of accountable officials over a specific period. The findings from this study are still appropriate for the period in which the interviews took place, from 2016 to 2019. However, they may not remain predictable, and attitudes to accountability may change. The research will still be valid, as it was relevant at the time, but it may no longer be generalisable within the same environment in the future. On the other hand, Whitehall has experienced many significant changes over the years and civil service attitudes to the concept of ministerial responsibility and executive accountability appear to have remained remarkably resilient. I finish with the parting questions posed by the last senior civil servant I spoke to about this research, as we walked down a long corridor to the main door of their department in Whitehall, and I handed back my security pass.

> *Do you think demand for accountability will increase in the near future, or will the concept be undermined? Or after the current commotion will things just return to the way they were?*

These are questions that cannot be answered here and now, but it will be important to ask them again, when considering the results of this research in the future.

Annex: Research Design and Methods

This research arose from a discussion that took place in the Cabinet Office in 2015. I was talking to a director from the Major Projects Authority (MPA) and we were comparing the challenges of working in the public and private sector. We first met when I was in the civil service and the accounting officer of a Next Steps Agency, and he was a director in the NAO with oversight of my organisation.[95] I had previously been the *accountable manager* in a business regulated by the Civil Aviation Authority (CAA 2019). We were comparing the accountability regimes of the two systems and the conversation turned to the topic of changes in the Osmotherly rules. He was involved in drafting the new guidance and the templates for the Osmotherly letters.

It became clear that although civil servants were frequently exhorted to display greater accountability there was no particular definition of what that meant from the perspective of those who were being held accountable. In our discussion about Osmotherly he described how the new guidance (Cabinet Office 2014) had introduced new accountability mechanisms for these officials tasked as Senior Responsible Owners (SROs). We concluded that knowing something about how these officials perceived their accountability would be a useful insight. Osmotherly (our shorthand for the new rules and their influence) was only one accountability mechanism being applied to an environment in which there were many. Understanding how SROs felt about their environment generally, and how they made decisions about the relevance of different account holding relationships, would be a necessary precursor to any examination of the impact of Osmotherly.

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[95] See (www.parliament.uk 2011a) for an explanation of the Accounting Officer. Greer (1992, 222-227) describes the Next Steps Initiative which led to the creation of agencies within government departments.

A.1 Selecting an approach to research SRO accountability

The search for links between any aspect of project management and the outcomes of projects is a major investigative activity. Similarly, studying the connections between accountability mechanisms and performance, to identify causal links, has never been an easy pursuit or a productive field of study (Christensen and Lægreid 2015, Dubnick 2005). The complexity of major projects, and the huge number of factors that may impact their success, makes the search for a causal link between accountability and performance in that environment particularly difficult. Establishing such a causal link is certainly beyond the scope of this research. The Cabinet Office is engaged in a programme of research, with a dozen UK universities, examining the management of major projects. This enterprise is known as Project X and was created by the Portfolio Insight Team at the MPA (now the IPA) to investigate the challenges faced by projects within the Government's Major Project Portfolio (GMPP). Project X seeks to 'promote and support methodologically rigorous research that is firmly grounded in clear pathways to impact' and to 'generate unique insights into the performance of major projects and programmes in Government, that can be used to drive continuous improvement in performance and delivery confidence' (Harrington 2018).

In discussions with the Cabinet Office it was suggested that it would be worth investigating the SROs' perception of their accountability, and how they felt it impacted on their behaviour within the project environment. In particular, whilst there were demands for project leaders to be more accountable, the MPA did not know how these officials felt about being accountable already, or how they would respond to the new accountability mechanism. There was an implied assumption within Whitehall departments that demanding more accountability, or imposing more accountability mechanisms, was a *good thing*. This was accepted without evidence or justification. The aim of my research was to provide some insight into the SROs experience of being accountable and consequently, with the aim of addressing Osmotherly as a later part of the work, the initial research question was scoped as 'how do SROs make sense of their accountability for major projects?'

Understanding accountability in practice

My research focuses on how the SRO experiences their role as the department's *owner* of the project. It does not examine their other activities, given that being an SRO is a part time role for most of them. There are other figures who also have some accountability for departmental projects, such as the permanent secretary, who is still regarded as accountable for everything that happens in the department, or the project director who is the hands-on manager of the project itself. Along with other potentially accountable entities, such as ministers and various organisations within government, these figures enter the research as actual or potential account holders of the SRO. It is not possible to consider the accountability of the SRO, as they perceive it, without considering these other individuals and organisations, but their own accountability was not examined. Throughout their interviews the SROs referred to the accountability they perceived that these organisations had to other account holders. The web of accountability described by Page (2006, 167), can extend well beyond the SRO's immediate environment.

It would be misleading to assume that the account holding behaviour of these other individuals or organisations would not be influenced by their own feelings of accountability for the project. I took the opportunity to interview some of them, such as ministers, politicians, auditors, journalists, and other civil servants, to get background material and context. However, the research focuses on the perception of the SRO about those individuals, and on what the SRO felt about them as account holding forums. It would take a much larger research programme than mine to investigate the extended perceptions of all the accountable entities in even a small part of the tangled web of accountability relationships in which the SRO operates.

Bovens (2007a, 2014) identifies the social relationship as fundamental to the study of accountability. Adopting this perspective suggested adopting Dubnick's view of the 'account-giving relationships as the basic unit of analysis rather than institutional arrangements and mechanisms' (2014b, 651). Adopting a constructionist position reflects the socially constructed nature of these relationships within the communities of civil servants that operate in these public sector environments. Their perspective on the way they are held to account is

embedded in the process of social construction by which they have adopted their norms and identities (Parsons 2010, 87). To address the research question, the relationships within this environment, with its multiple social engagements, must be interpreted. This evokes, as Furlong and Marsh (2011, 185) describe, the *double hermeneutic* where the SRO is interpreting their world and the relationships within it, and that is then interpreted by the researcher as an observer. This process of interpretation required careful consideration of validity in the approach to the investigation and analysis. I assume an interpretive epistemological stance, and seek to understand the way in which the officials perceive those accountability relationships, and their process for judging their importance or salience. This is about understanding how they identify the accountability relationships that matter, to which forums they feel particularly accountable, and how they make decisions about the potential multiplicity of relationships that affect them.

Examining *felt* accountability is based on interpreting the SROs descriptions of their experience of accountability rather than considering the characteristics of the mechanisms that an external observer may infer. I decided to use the introduction of the new accountability mechanism to bring specific focus on how individual relationships are regarded and how individuals respond to them. This new Osmotherly mechanism is mentioned in the appointment letters of SROs and was introduced across all the major projects during the period of the fieldwork. Consequently, the research question developed after further engagement with the Cabinet Office, to become 'how do SROs understand and manage their accountability environment, and what is the impact of the new Osmotherly mechanism?'

A Qualitative Design based on Interviews

Assessing the effect of an accountability regime on senior civil servants, positions this as a form of evaluation research, particularly as it had been initiated in discussion with the MPA, which had an accountability relationship with SROs. As Robson (2016 p.176) suggests, this form of research is a sensitive activity for those being asked about their behaviour within an increasingly accountable public sector. As part of getting approval for SROs to take part, the

research design was discussed with the Cabinet Office. This included negotiating access to participants and consideration of the anticipated response rates from senior, and busy, individuals. It was necessary to get the appropriate clearances and permissions, and the negotiations to achieve access included the offer to feed back the outcome of the research to the MPA. I agreed that the thesis and any feedback would be in a fully anonymised format to ensure individuals were prepared to engage positively.

Investigating how the SROs experience accountability, and how this 'social experience is created and given meaning' implied a qualitative study (Denzin and Lincoln 2008, 14). When investigating officials' perception of accountability, Sinclair (1995) and Lupson (2007) both adopted a qualitative exploratory methodology using interviews. Interviews were the basis for Heclo and Wildavsky's research on Treasury officials (1981), for an examination of middle ranking policy staff in Whitehall departments undertaken by Page and Jenkins (2005), and for the environment of more senior figures by Rhodes (2005). Semi structured and open ended interviews had also been used successfully by Hood and Lodge investigating the perceptions of senior bureaucrats (Lodge 2013). Adopting this approach, using interviews with a group of officials, would allow a purposive study, applied to individuals engaged with practical experience of public sector accountability. The Cabinet Office also felt that my previous occupations would be beneficial in establishing a rapport with the participants. On the other hand, whilst this background experience might aid interpretation of the environment, it also presents issues around impartiality and reflexivity.

Shadowing some senior leaders, or participant observation, like that undertaken by Rhodes (2011) in his examination of 'government elites', was ruled out because the GMPP projects were subject to commercial and operational security constraints and political sensitivity. Surveys were not considered an effective approach to data collection. They have been used elsewhere to develop a quantitative view of the accountability felt by public managers across European administrations. Two recent studies by Schillemans used this approach. The first (Schillemans, 2015) examined how public managers experienced accountability processes, and then how they managed multiple accountabilities. This is one of

few investigations into how managers describe how they cope with the frustrations arising from multiple accountability. A second (Schillemans and Overman 2018) investigated 7 countries and included UK civil servants. Whilst exploring how access might be achieved, I discounted surveys as they were unlikely to provide a suitable response rate and a rich enough perspective of the SROs experience. The initial exploratory discussions with SROs confirmed that highly informative responses would come from interviews and suggested that they were willing to engage in a candid discussion about their roles, and thereby provide greater insight than possible within an anonymous survey.

A.2 Access to the research population

I anticipated that a sufficient proportion of SROs could be interviewed to provide enough data to support themes and patterns arising within their responses. The idea of undertaking an extensive series of semi-structured interviews from a purposive sample of project leaders was proposed and was approved by the Cabinet Office, with some caveats. This negotiation with the Cabinet Office and MPA, in the role of gatekeepers (Robson 2016 p.176), included a guarantee of individual and departmental confidentiality, and anonymity within the thesis and any publications. The participants were operating in an environment replete with significant amounts of audit and evaluation. In that context it was important to avoid this being perceived by participants as another form of evaluation of them or their projects, or just another exercise in holding them to account. Organising access to SROs then brought together my experience as a civil servant, and now as a researcher, when I realised that getting approval from one senior figure in government does not mean that you have similar approval from anywhere else within government (which was also a feature of many subsequent comments by SROs during the interviews). Cabinet Office approval for the research was followed by an extensive period of negotiation covering the terms of any discussions and publications.

<u>Negotiating Access</u>

Given the sensitivity of the projects, the Cabinet Office insisted on a formal Non-Disclosure Agreement (NDA). This took several months to negotiate with the Government Legal Service and with advice and input from the LSE Legal department and others. It was finally approved by the Minister for the Cabinet Office in July 2016. The agreement provided for the researcher to have access to individuals in leadership roles within GMPP projects and came with some restrictions:

- The interviews would be completely anonymised with no identification of individual, department, or project, within the thesis.

- The transcripts would be fully redacted removing all identifiers before analysis.

- Access to recordings and full transcripts was restricted to the researcher and recordings would be destroyed once the transcriptions were redacted.

- To protect individual and departmental confidentiality, only the researcher would have access to the names of those individuals who had participated.

As the research could only continue if these terms were agreed they were accepted, and the main body of interviews took place over the following two years. The impact of these restrictions on the research outcome is discussed below.

In 2016 the MPA merged with Infrastructure UK to form the IPA. The new organisation continued to support the research. They facilitated formal access to three civil servants with the role of Head of Project Profession (HoPP). The HoPP supports and promotes the project management profession within their department. These three agreed to facilitate introductions to SROs within their departments. The initial meetings provided the context for the creation of a topic guide and schematic which was used for the later interviews. These introductory meetings confirmed that participants were interested and capable of engaging in an open manner, including describing their discussions with ministers and other senior figures.

These discussions initiated a programme of introductions, and with other departments invited to take part by the IPA, a suitable group of SROs were invited to participate.

<u>Sampling the population</u>

At any time, there are over 130 projects in the GMPP list, with projects being added and removed at various points in their life cycle. During the fieldwork from 2016 to 2019 the number of projects on the GMPP list fell from 188 to 133, with 130 projects entering, and 190 leaving the list. The numbers are contained in the Annual Reports of the MPA and IPA over that period (IPA 2016, 2017, 2018a, 2019a, MPA 2014, 2015). During these four years, 274 different projects were on the GMPP list at some point and this gives an approximate figure for the total available population of SROs, as there were changes in SRO for some projects during this time, and some SROs act for more than one project.

The formal interview programme started once the NDA was in place. The IPA contacted an extensive list of SROs and project directors and encouraged them to make contact and participate in the research. This was a self-selected group but considered varied enough to provide a representative sample. The objective has been to ensure a reasonable spread of officials across departments and types of project. The immediate response from officials was positive with over 40 SROs agreeing to be interviewed. Other participants were identified by those taking part and this snowball sampling identified many more individuals. I was not able to meet all those who put themselves forward for interview, but interviews with 47 SROs provide the core of the research. It was not possible to identify if some groups were not approached, in certain departments, or for particular reasons, but the response across departments and types of project avoids any unwarranted concentration.

Of the 274 GMPP projects during the research period, 171 of these were within departments where SROs were interviewed. A list of project numbers by department for the years 2014/15 to 2018/19 is at table A.1. The SRO interviews took place from late 2016 to early 2019 (over 30 months) and were conducted with officials across 9 departments and across all four of the GMPP categories of project. Overall the research covered 17% of SROs across

government and 27% of those in the 9 departments. The breakdown of the available 274

projects into the four categories used in the GMPP classification is shown at Table A.2, which

also shows the spread of SRO interviews. There were sufficient interviews across the four

categories to determine that there was no discernible difference between the SROs comments

about accountability from the different types of projects.

Table A.1 Interviews by government department

Department	Number of GMPP Projects over period 2015-2019	Interviews with SRO	% of SROs interviewed	Interviews with PD/Other
Education	8	1	13%	
Treasury and HMRC	8	4	50%	1
Work and Pensions	11	7	64%	6
Business	13	2	15%	1
Home Office	13	6	46%	2
Transport	21	7	33%	1
Health	23	8	35%	2
Justice	26	5	19%	1
Defence	48	7	15%	2
Total from departments interviewed	**171**	**47**	**27%**	**16**
Other Departments	103	0	0%	0
Total for GMPP	**274**		**17%**	

Note: Interviews took place with officials from 9 departments out of 21 that had GMPP projects during the fieldwork period. The table shows the number of projects by department, the number of interviews with SROs, the proportion of SROs interviewed in that department, and the number of interviews with civil servants from the department who were not SROs. The numbers exclude interviews with ministers, journalists, NAO officials, and others.

The gender balance was not examined for any difference in attitudes. During the period

2015-18 women represented an average of 41% of the SCS but only 16% of SROs. [96] Five

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[96] Statistics based on published names of SROs on www.gov.uk GMPP data files 2015-2018

female SROs were interviewed, which represents 11% of the interview total. There was no

obvious difference in the reported perception of accountability, but this is an area that may

warrant future investigation. Other individuals were interviewed within departments, to get a

perspective on the projects and accountability generally. Most of these were project directors

and other senior officials such as permanent secretary or functional DG.

Table A.2 Interviews by category of project

Project Category	Number of GMPP Projects over period 2015-2019	Interviews	% of SROs interviewed
Government Transformation and Service Delivery	112	21	19%
Infrastructure and Construction	62	9	15%
ICT	57	10	18%
Military Equipment and Systems	43	7	16%
Total	**274**	**47**	**17%**

The table shows the number of GMPP projects which were underway during the
research period, by project category, the interviews for each category, and the
percentage that represents of the category.

Deciding upon the number of interviews to undertake was subjective and raised the

issue of credibility. Previous public management accountability studies have used interview

numbers from 15 (Sinclair, 1995) to 110 (Ezzamel et al., 2007) to achieve theoretical saturation.

Lupson considered he achieved saturation with 20 interviews (2007 p.118). Acar investigated

the general nature of what accountability meant with executives in the US across 38 interviews

from a target group of 120 (Acar, Guo, and Yang 2008, 11). It would have been possible to

undertake more than the 47 SRO interviews here. With the spread across departments and

project categories, there was no indication from the analysis of interview data that adding

further respondents would have added more information. No 'new patterns or categories' were

evident (Yang 2014, 167). The 47 was therefore regarded as reaching theoretical saturation and

no further interviews were added to the research data. Boyzatis describes the importance of

sampling design for thematic analysis and the need to ensure adequacy and appropriateness for efficacy and efficiency (1998p.xi). The total of 47 SROs and 16 supporting civil service interviews gave sufficient data to evaluate any *between-unit variation* and allows generalisation across the SRO community, whilst being a manageable total. Some additional interviews were conducted for context, such as those with ministers, broadcast journalists and other senior commentators who were cited by participants as individuals felt to be holding them to account.

A.3 Interviews and data collection

During the research there were four phases of interviews. The first phase was the discussions with the HoPP. The second phase was a small group of interviews with some SROs and Project Directors to establish interview protocols before meeting the main body of SROs. The third phase was with the first main tranche of SROs over 2017 to 2108 followed by some data analysis before the fourth phase covering the remaining SROs over 2018 to early 2019. The second group incorporated some confirmatory discussions about aspects that arose from the analysis. In total, with 47 SROs, some repeated, and the group of civil servants and other individuals, there were almost 80 interviews. The 30 months to undertake the interviews was not intended to examine any longitudinal effects but related to the practicalities of arranging interviews with these busy individuals.

Interviews and use of a schematic

The objective of the semi-structured interviews was to get participants to create their own 'thick description' (Geertz 1973, 6) of their perception of their accountability environment, which could then be analysed. To enable a suitable time for discussion, I requested an hour for each interview and most were able to allow that time. To move beyond a description of concepts, and towards how they manage within the environment, the interviews focused on both episodic and semantic knowledge, described in narrative form by the interviewee. Flick (2009, 185) describes the episodic as being 'closer to experiences and linked to concrete situations and circumstances'. Semantic is based on 'assumptions and relations, which are abstracted from

these and generalized'. These were brought together in the interviews which explored episodic-situational forms of knowledge, where the SRO had experienced being accountable. The interviews explored how they perceived their accountability environment using specific episodes, such as their appointment, agreeing their project terms of reference, or being called to account for something related to the project. Interviews addressed how they saw these relationships to be organised, how that accountability was enacted, and the frequency of such events. They described their experience of the environment and its complexity, and how they treated that complexity in terms of their management behaviour and actions. Given the importance managers place on personal communication and descriptive narratives (Hummel 1991), the interviews provided considerable opportunity for them to describe their feelings about accountability.

After the first meetings with the HoPPs, some pilot interviews took place to validate interview protocols and any prompts that would be used with the SROs. These interviews identified a problem that could influence the research. The participants were expecting the conversation to be about accountability and had been informed by the Cabinet Office that this was the purpose of the research. These were elite interviews with experienced managers (Harvey 2011). The changes in the Osmotherly rules make accountability a specific part of their job description. This was also a topic that many had discussed at the government's Major Projects Leadership Academy (MPLA). They had therefore researched the concept to some extent before the interview and had a perspective which was informed by their own research and their discussions with each other. When Sinclair (1995) and Lupson (2007) started their interviews with public managers they were able to discuss the roles without specific reference to a formed view of accountability, and could then analyse their response to gauge the participants' perspectives. The profile of *leaders and their accountability* has increased substantially since then. A similar approach now might result in a reworking of their MPLA discussions, or the outcome of an internet search, being fed back to the researcher. Even open-ended questioning might lead the participant to describe their learned view of the concept of accountability, rather than describing their experience of the phenomenon in practice.

Pawson and Tilley address the challenges inherent when talking with senior figures in their discussion of the 'realistic interview' (1997, 164). They described how participants 'always want to know far more than is conveyed in the formal structure of the questions and already routinely trawl for such snippets of collateral information about an inquiry' (p. 167). This became apparent in the initial interviews, where participants were keen to know 'what they should be saying', 'what have others said' and 'what are you really after'. Pawson and Tilley suggest that a key objective of the interview:

 'should be understood as putting the subject in a position which allows them to think…

'Yes, I understand the general theoretical ground you are exploring, this makes your

concepts clear to me, and applying them to me gives the following answer'' (p. 167).

Their approach suggests leading with theory, adopting the 'teacher-learner function' and allowing the participant's response to support a 'conceptual refinement process'. Consequently, the design of my research recognised that these project officials had an interest in understanding the concepts behind the research as much as they had in talking about their perceptions of the environment and their responses to it.

To support the discussions, I created a visual schematic to represent a model of an accountability relationship. The schematic acted as a prompt for both researcher and participant. The intention was to develop a sophisticated enough aid without forcing a particular perspective on participants. This 'cognitive map' (Axelrod 1976, vii) draws upon the concepts and language described in the existing literature and used Bovens' framework diagram as the basic outline, based on his minimal conceptual consensus (Bovens 2007a, Bovens, Goodin, and Schillemans 2014, 6). It represents the relationship between actor and forum, the obligation to inform, and the subsequent judgment and sanctions. The terminology I included within the schematic was that used in Bovens' description and from the accountability studies of Dubnick, Koppell, Mulgan, Romzek, Schillemans, and Yang (described in chapter 1). These works were chosen to give a breadth to the terminology within the schematic and to avoid drawing too tight a frame of reference around the description.

The downside of using a schematic like this is that it creates a frame and the possibility of a framing effect on the consequent discourse. Its use was discussed with academics involved in supervising the research, and Thomas Schillemans whose work it included. These meetings clarified how it could be used to inform rather than lead the discussion with officials, and how it should be introduced and managed as part of that interview and analysis process. The objective was to channel the hypothesis-seeking behaviour of the participants (Pawson and Tilley 1997, 167) and to present them with a framework that they could use in describing their own experience and feelings about accountability. The interviews were then able to focus on how participants felt about being accountable, using the framework as a reference, rather than spending time trying to define the underlying concept of accountability in their own or MPLA terms. After the first interviews it was suggested by participants that it be adapted to show multiple account-holding forums and the concept of 'multiple accountability disorder' (Koppell 2005, 95), with multiple boxes representing differing perspectives on judging and outcomes. The schematic used for the main body of interviews is shown at figure A.1.

In the early interviews I asked officials how far their experience supported or differed from the model. Tsang (2017, 52) describes assumption-based theory testing and argues that it helps to assess the realism of an assumption or open up new areas for strengthening a theory. After a brief introduction, the participant was shown a large version of the schematic and was invited to use it if they felt it useful. The SROs commented that the model included most of those aspects they were aware of when considering their accountability environment and there was a consensus that the schematic provided a practical representation of their experience. The interviews moved very quickly into discussion of how they experienced being accountable. It was not apparent during the interviews, or when reviewing the subsequent transcripts, that the schematic had forced a particular frame onto the discussion. Participants were asked if the diagram had directed them and on no occasion did anyone describe it as prescriptive, although it could be argued that they wouldn't admit that to a researcher anyway.

Yes, that schematic is the way it feels. [#357]

So each of those points is being pulled in a different direction (pointing to elements on the schematic) [#358]

The picture you showed me of the schematic with a set of interrelationships, I am sure it is accurate as an abstracted view of accountability, and my experience, at this department, is that it is also constantly evolving. [#359]

Figure A.1 Schematic used for interviews
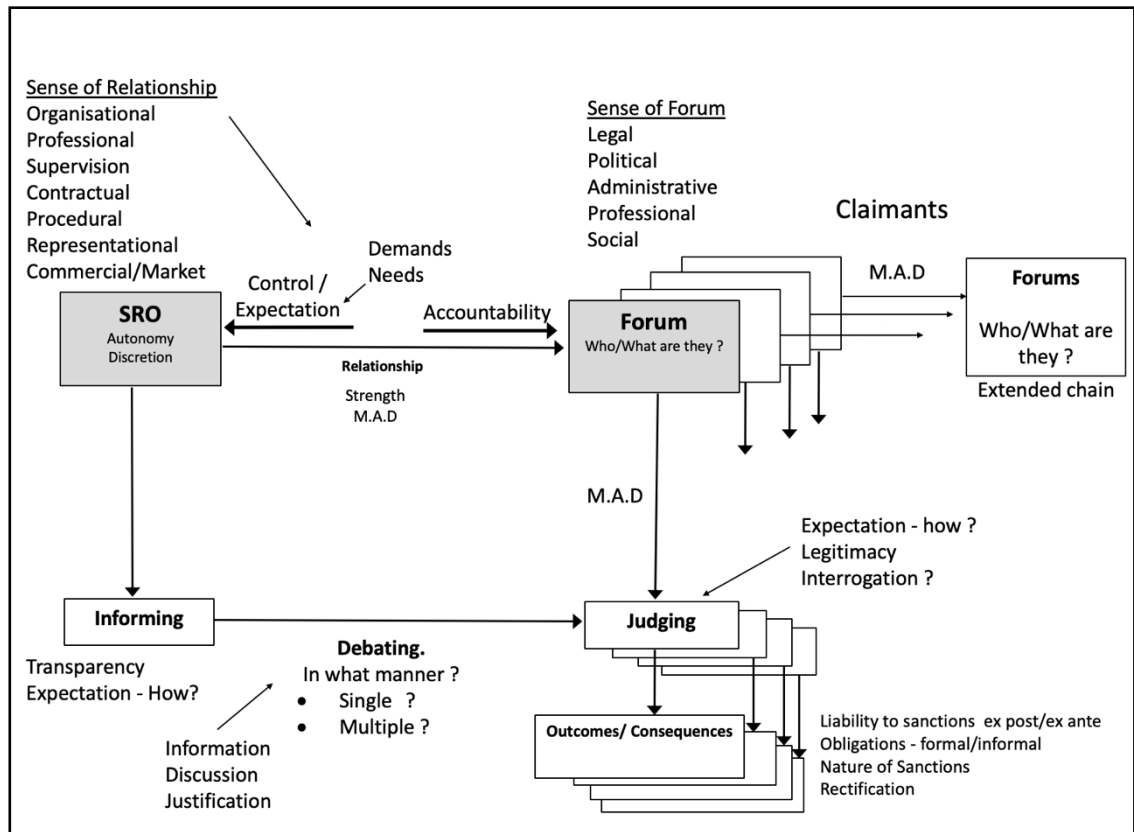
Data Collection

The empirical information for this thesis has been gathered from conversations with the SROs of major projects. Several asked to see the Cabinet Office NDA before continuing but there was no occasion when an individual withdrew from the interview or declined to take part, once we had met. The interviews took from 45 to 90 minutes, with most lasting over 60, and were held in the participant's office or a private meeting space. In most interviews, after the introductions, the participants spoke with little interruption, other than occasional questions for clarification.

In two of the interviews the participant spoke for over 45 minutes without stopping, and with no comment from the interviewer. All interviews were recorded. Direct questions about their specific project, or department, and any specific individuals were avoided due to the confidentiality clauses in the research agreement with the Cabinet Office and my impression is that this allowed them to be frank about their experiences. These roles are stressful and busy, but as Rhodes observed during his time with senior civil servants, 'many have a need to talk' (2005, 21), and I recognised his comment regarding the interviewer 'cast in the role of providing reassurance', as the participants described the way they felt about their roles.

The ethical issues of informed consent (Ryen 2004, 219) and confidentiality were addressed by ensuring a full written and verbal explanation was given to those involved, including their data anonymity and ability to withdraw at any time. The protection of the recorded media and its security was a major concern for the Cabinet Office. The interviews were digitally recorded, and downloaded to an encrypted storage system with no identifying title linking recordings to individuals. Only the researcher had access to the decryption codes and the storage systems were held securely. After transcribing the interviews, the document was redacted, and all identifiers removed. This guarantee of anonymity to the participants is regarded as having allowed them to provide authentic and uncensored commentary of their experience. Some of these narratives were particularly revealing.

I had the opportunity to meet four of the SROs twice, with up to 18 months in between interviews. These provided an opportunity to achieve communicative validation of their statements and my interpretation from their first meeting (Flick 2009, 389). It would have been useful to achieve this with more participants but did not prove possible at the time. I was also able to check my interpretation in two meetings with the Project X community. At a conference in January 2017, I discussed the research in small groups with around 50 practitioners, which included several SROs. Conversations with SROs and project directors at this meeting gave support to the authenticity of the reported observations from the interviews. At another Project X conference in March 2018, I was able to discuss the themes arising from the data with individuals involved with the GMPP, either SROs, project directors, or senior staff in the IPA.

These two groups of discussions do not form part of the research corpus. A final confirmatory meeting with Project X staff took place in November 2019 when my overall findings were discussed with a group of senior officials from the IPA. This meeting, inter alia, covered the challenges inherent in self reporting and assessing validity.

Throughout the research, opportunities were taken to interview other relevant individuals as they arose. During the interviews a number of SROs referred to organisations or individuals that they felt held them to account. Some described feeling as if they were being held to account when their ministers were called to account by external organisations to discuss their projects. Journalists and think-tanks were examples of forums which had no formal authority, but which were described in this way. Representatives of these potential forums were interviewed to get their perspective on the nature of civil service accountability and how they felt their organisations held ministers or civil servants to account.[97] These provided valuable insight into the behaviour of these forums and there was nothing that arose from these supporting interviews that changed the basis of the research and its outcome.

One group of potential subjects for interview proved to be more elusive than originally hoped. The plan for the research had included interviews with some politicians, ministers and Secretaries of State. The fieldwork coincided with the negotiation of the UK departure from the EU, over late 2016 to early 2019. It became increasingly difficult over that period to get ministers to engage, and certainly not to be recorded. Despite various conversations only one Secretary of State was prepared to be recorded and give their perspective on holding civil servants to account. Although the comments were revealing, they were not considered to be enough to represent an analysable perspective on acting as an accountability forum. Rather than pursue this approach it was left as a potential future research topic to explore how the account-holding politician views the relationship from their location in the accountability chain.

The reports of select committees and the PAC provided insight into the behaviour of SROs when being held to account. The transcripts of committee evidence sessions and the

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[97] Examples included various individuals at the Institute for Fiscal Studies, the Institute for Government, the National Audit Office and a senior BBC political journalist.

video recordings of some of their performances are available on the parliamentary website.[98]

There were 26 appearances by SROs at the PAC during the 2015 and 2017 parliamentary

sessions (the period covered by this research) and a further 7 appearances at select committees.

Material was also available from the NAO reports which supported these PAC hearings. This

documentary and visual material was used to provide some triangulation of the comments by

officials, particularly in relation to their perception of the parliamentary committees and the

NAO. Details of these appearances are at appendices 3, 4, and 5.

A.4 Analysis and modelling

The research produced a large volume of textual material which required interpretation. The

transcripts amounted to almost 600,000 words. The selection of comments to support the

arguments was my own. In this manner, the presentation of the SROs experience to support the

analysis follows the approach of Heclo and Wildavsky's 'Private Government of Public Money'

(1981, lxiii) and Page and Jenkins' 'Policy Bureaucracy' (2005, xiii). I used thematic analysis

to analyse the outputs from the interviews. This is an effective method for analysing large

qualitative data sets (Nowell et al. 2017) and I used Attride-Stirling's (2001) approach with

thematic networks to help organise the qualitative data and to facilitate further analysis and

future discussion.

Thematic analysis

Attride-Stirling reinterprets Toulmin's (1958) argumentation theory, adapting the data-warrant-

claim process and renames the steps through basic, organizing, and global themes, to draw

overarching themes from the textual data. She uses a pictorial network as 'an organising

principle and a representational means' which 'makes explicit the procedures that may be

employed in going from text to interpretation' (Attride-Stirling 2001 p.388). The structure of a

thematic network is shown at figure A.2, and illustrates her terminology for themes: basic,

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[98] The term *performance* is not inappropriate as noted in the descriptions of the PAC by SROs
covered in chapter 7.

organising, and global. I identified basic themes and their aggregation to global themes through a process of coding and review over an extended period. Thematic analysis is a useful approach to summarising key features of the data set, highlighting similarities and differences.

Figure A.2 Thematic network (after Attride-Stirling, 2001)
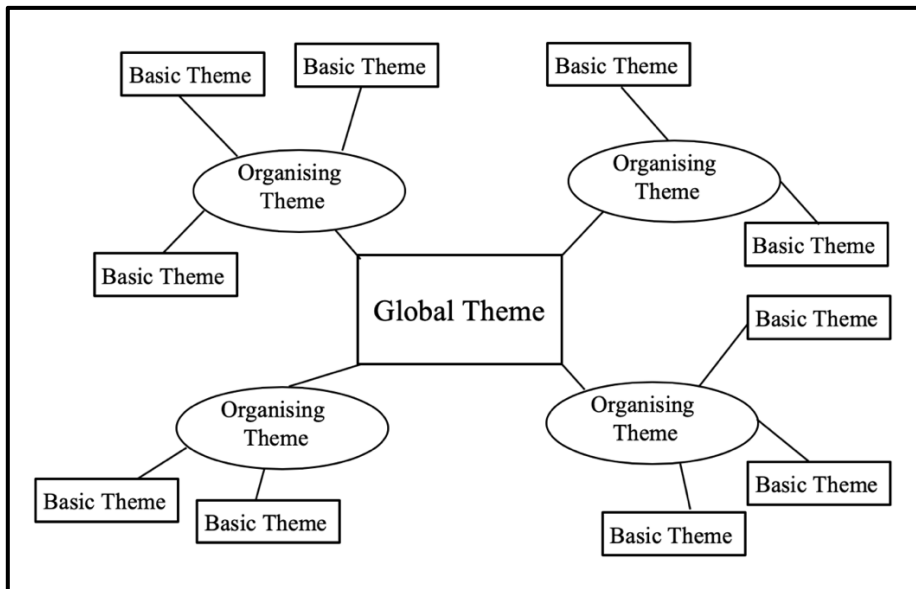
Note: The figure shows an outline of a thematic network, with basic themes supporting organising themes which support a global theme. Separate versions were created to model each of the global themes arising from the interviews.

Using the process outlined by Attride-Stirling, a coding framework was used to select key sections of texts which emerged as relevant across the corpus. The framework was based on the 'theoretical interests guiding the research question' (Attride-Stirling 2001 p.390) and on recurrent issues that arose in the pilot interviews. The creation of a meaningful and useful coding structure is widely covered (Boyatzis 1998, Flick 2009, Saldaña 2016) and authors stress the need for rigour in defining them and their boundaries. The code description and definition here were short, in line with Guest (2012), and did not extend to full detailed descriptions. The initial codes were used to abstract themes from the early interviews and were then refined as a result of that activity. Sections were identified, either as phrases, sentences, or short paragraphs with some words such as 'reputation' and 'sanction' identified as specific topics. After the pilot

interviews the coding framework was reviewed and care was taken to avoid placing undue emphasis on the terms on the interview schematic where they were fed back to the researcher as part of the discussion. The coded items were then used to identify basic themes.

The notable sections were the refined further into themes which were 'specific enough to be discrete (non-repetitive) and broad enough to encapsulate a set of ideas contained in numerous text segments' (Attride-Stirling 2001p.392). The themes were then arranged in coherent groupings, being brought together into groups with shared issues and clustered into organising themes. The next step was to bring them together into one superordinate or global theme. This process identified five global themes from the texts, which are shown at table A.3. To facilitate the process, the NVivo software programme was used to help deal with the complexity of the data and act as an indexing tool to help aggregate up through to organising themes and then to global themes. Because of the restrictions placed on the research process by the Cabinet Office, using external researchers to code independently to verify the selection presented a problem, so texts were reviewed and coded twice with a period in between to improve validity. Having prepared the basic, organising, and global themes they were illustrated as a thematic network and these pictorial representations formed the basis of a review of the texts to verify that the network reflected the data and the data supported the thematic structure. These networks were then reviewed and interpreted leading to the summaries presented in the chapters here. Five principal clusters of themes were derived from the data. Each theme is considered in detail within the individual chapters, 3 to 7.

Table A.3 Global themes obtained from the SRO interviews

Global Theme	Description
General Perspective	Officials concur about general aspects of accountability
Evaluating Forums	Officials evaluate the salience of the forums they face
Categorising Forums	Forums can be categorised within a representative typology
Managing Relationships	Officials adopt coping strategies for dealing with forums
Osmotherly Rules	There are three different interpretations of the guidance

The first global theme is 'General Perspective' and is the basis for chapter 3. This encompasses the officials' feelings about SRO accountability generally within their departmental environment. There was substantial consensus in the descriptions. During the research it became evident that individuals assessed the salience of the various forums they interacted with, as part of deciding how to respond to their calls for an account. A variety of themes arose which could have been brought together as one comprehensive but large global theme covering all aspects of how forums were assessed and categorised. Instead these aspects were divided into two areas; the first about forum evaluation in chapter 4, and then the process of forum categorisation in chapter 5. The next global theme covers how officials manage their accountability relationships and is covered in chapter 6. It proposes some coping mechanisms used by the officials to manage the demands of the various forums. The final global theme covers the SROs perception of the Osmotherly Rules and the impact the changes have had on the way they manage their projects. This is covered in chapter 7. The organising themes which support the global themes are shown at appendix 6.

Stakeholder theory: a model for forum evaluation

Implementation is difficult (Pressman and Wildavsky 1979), particularly because of the complexity of the interactions that any implementation organisation has with its many stakeholders. In his seminal work *Strategic Management: A Stakeholder Approach* (1984), R. Edward Freeman introduced the concept of multiple stakeholders and their impact on an organisation. Central to this was his definition of organisational stakeholders as 'any group or individual who can affect or is affected by the achievement of the organization's objectives' (2010, 46). He described the stakeholder concept as a way of providing a conceptual map of an organisational environment for managers (2010, 247) and the purpose of strategic management as being to chart the direction for the firm with all these stakeholders in mind. Bryson addressed the identification of stakeholders in public sector settings and specifically noted that Freeman's definition includes 'the nominally powerless' (2004 p.22). Stakeholder theory

emerged during my analysis as an effective aid to understanding the themes arising from the data. I adapted it to create a model of forum typology and categorisation.

Project managers spend time trying to identify and understand their stakeholders. They use a broad definition of stakeholder, to include those entities which could affect their project or could be affected by it and follow Bryson's approach of including individuals or groups that have little discernible authority over them or their project. Whilst some form of stakeholder analysis has always been relevant for managers, the interconnected nature of public provision now makes it more important. As Bryson notes, 'it is hard to imagine effectively managing relationships without making use of carefully done stakeholder analyses' (2004 p.24). For the public manager it is equally important to adopt a similar approach to identifying and understanding which of the stakeholders can hold them to account. When creating a conceptual map of their accountability-environment, the public executive's identification of forums, and why they matter, is similar to the corporate manager's identification of stakeholders, and why they matter.

When identifying the forums to which they felt accountable, project officials recognised a broad range of individuals and organisations. Some took the broadest view of their environment and described a wide variety of stakeholders as potential accountability forums. They considered that many of the entities that could affect the project, or were affected by it, could call on them to give an account. Others chose a narrow field and restricted their list to a few specific domains. Officials frequently used the term stakeholder to describe an account-holding forum. Few used the word 'forum' unless prompted or until the schematic had been discussed. When participants referred to a forum it was usually in the sense of a meeting where ideas or views could be exchanged.

I wanted it to be a forum where people could say anything they want. [#360]

Throughout the descriptions in the main body of the thesis, where 'stakeholder' was used in the context of an account holding forum it was interpreted as such. The quotations contain the actual terms used.

Fundamental to the way that the SROs experienced their accountability was the way they determine the identity and characteristics of the various forums to which they felt accountable. They described facing a variety of different account-holding forums, including individuals, committees, boards, organisations within government or outside, pressure groups, politicians, and the public. The question for the SRO becomes 'what is a forum' and 'which ones really count'. It is comparable to the questions posed by Freeman in his description of stakeholder theory (1994, 411). To manage their project, and respond to demands for accountability appropriately, project officials must identify which forums are relevant and in what way, and stakeholder theory provides a useful heuristic device. An alternative approach is described in a review of non-profit accountability by Candler and Dumont (2010), which identified ninety different potential components from the combination of nine types of account holder concerned with ten types of resource (their description of 'for what', p. 261). This seemed overly complex and subjective for my analysis so I chose to adopt the stakeholder modelling of Mitchell (Mitchell, Agle, and Wood 1997) which enabled the use of the SROs descriptions to identify the important forums, and facilitated the subsequent analysis of why they felt them to be relevant, and then how they managed multiplicity.

A major part of the role of the SRO is the mapping of the accountability environment and the assessment of the various account-holding forums and their capability and potential impact.

> *You then begin to identify and define your stakeholder community, both the pros and cons.* [#361]
>
> *There's about 20 senior stakeholders in the system that I need to keep briefed, fed, watered, and I do this on a day a week.* [#362]

Following the first main group of interviews the thematic analysis led to the identification of key attributes in the officials' process of forum evaluation. This led to the creation of a theory-based schematic covering these attributes and a consequent typology to describe the different types of forum. The schematic typology shown at figure 4.2 was developed by adapting the work on stakeholder analysis by Mitchell et.al. (1997, 854) which used three attributes to

address the salience of stakeholders in commercial ventures. Using a similar approach here, three groupings of attributes were identified to describe the salience of forums to the project leaders. The diagram shows how these attributes combine to give a typology of seven attribute-based groupings. I added an eighth group to represent those forums with no discernible attributes, or no capability to actually call the SRO to account, but which were raised by officials as influencing their behaviour.

The typology schematic is used to display the categorisation of the various specific forums that SROs identified as relevant. There was substantial agreement amongst participants about the typology and classification. In the group of confirmatory interviews, the participants were asked to consider where their forums might be represented on the diagram. They were also asked if the typology provided a valid or useful model of their environment. The responses were positive and provided a useful introduction to the way project leaders managed their forums and tried to manage their movement from one type to another. There was no attempt to quantify the scale of the attributes. Power or expertise are clearly not binary characteristics. It might be possible to assess the strength of any of the attributes in interviews or by survey but that was not followed up. Instead the consideration was whether or not a particular attribute was mentioned or identifiable within the discussion, adopting that as a threshold. In practice there appeared limited nuance in the SROs commentaries, and account holders were usually described as either powerful or not, having an appropriate focus or not, or as having expertise or not. However, further investigation into the effect of the strength of attributes and their combination could expand the value of this approach and uncover different aspects of how SROs evaluate their account holders.

A.5 Quality criteria

SROs are in senior positions within both their departments and the major projects environment, and each SRO shapes and defines their roles and determines the nature of the accountability they perceive and accept in these situations. The intent behind the research was to explore their experience of this accountability and to interpret how they respond to it. In trying to draw

conclusions from these interpretations there are inevitably some questions about the credibility of the witnesses, the validity of the interpretation, and the reliability of the results.

Authenticity, validity, and bias in interviews

There are recognised problems facing any research based on interviews, and the credibility of the participants. The SROs dialogue could certainly contain the biases of reticence, exaggeration, or slanting their commentary, that were described by Page and Jenkins (2005, xiii) in their study of mid ranking civil servants, or the recall bias described by Lodge (2013, 195). There is also the challenge of providing an authoritative account from the episodic 'impressionist' or 'confessional' moments like those recognised by Rhodes (2011, 10). In my case, the SROs were given a guarantee of anonymity and it was made clear that the interviews were about a specific academic research programme and not an opportunity to feedback their experience to any other part of government. My background as an executive at this level of the civil service brought both 'experiential knowledge' (Maxwell 2005, 37) and acquaintance with the role of a senior civil servant, but therefore some potential bias. This clearly affected my role as a researcher and as Pink (2004, 367) notes, in relation to an interview, the 'encounter and the knowledge produced through it can never be objective'. The shared experience of working at this level in the civil service gave me some insight into the discourse within the interviews. But the question of authenticity remains and whether or not they were being honest or saw this an opportunity (consciously or subconsciously) to provide a biased opinion, either in the hope it would be fed back to the IPA or to justify their position emotionally to themselves. As Lee (1990, 235) observes 'interviewers are at the mercy of informants who unselfconsciously project an official self-image. They need to find ways of decoding the information they are given.'

The interviews used episodic descriptions to position their commentary within a relevant situation. However, the topic was their perception of how they felt about being accountable rather than specific detail about what happened, and so recall bias was not regarded as problematic. One way to judge their sincerity was that there was sufficient unanimity and

consistency across the interviews over the research period and across the different departments that I assume that there was either comparatively little self-presentation to bias their response, or there was widespread self-presentation. I have chosen to assume the former as representing the bulk of what I saw and heard. Nothing in the separate sessions that I had discussing the outcomes with the IPA or others would indicate this was the wrong decision.

The results of this research have been presented with illustrative quotations from the interviews. A possible critique of this, recognising that these illustrations are chosen to support my interpretations, would be the 'selective plausibilization' described by Flick (2009 p.384). The quotes are chosen as statements to illustrate the themes that arose from the data and the analysis. The quotations do not stand on their own as evidence but are taken from the large volume of transcribed interviews. They are examples of themes and should be seen as supporting the analysis and not replacing it.

Addressing validity in interviews, Legewie (as cited in Flick, 2009, p. 388) claims that interviews should meet three criteria: that the record of what was said is correct, that it is appropriate in its context, and it is sincere. These interviews were recorded and then transcribed. Listening to the interviews before transcription and again afterwards ensured they were accurate representations of the event. Reading them again after redaction ensured that the sense had not changed as a result of removing the various identifiers. The initial coding took place over time but notes on the transcripts meant that specific moments, demonstrative or emotive, were not lost. Given restrictions on access to the data, the transcripts were blind coded again after a few months. Some limited member checking (Robson 2016, 158) with SROs and other officials helped ensure that the developing themes were in line with their perspectives. The recordings were listened to many times over the course of the research and the coding was checked and adjusted accordingly before drawing out the themes (Boyatzis 1998 p.147) . Once the initial themes had been developed, they were refined as new interviews took place and new transcripts were created. Consequently, I am confident that the interview transcripts, and the themes arising from them, represent a valid record of what was described by the SROs. From

the consensus across the SRO's interviews and the feedback from the discussions with groups of their colleagues I consider that these were sincere and contextually appropriate.

Reliability and reflexivity

Addressing reliability, the consistency across the interviews was achieved by using a standard protocol for all of them, which involved a brief explanation of the research question, an outline of the schematic, and an invitation to talk about how they felt about their accountability. Prompts were limited to occasional questions to ask them who they felt accountable to and why, how they coped with different forums, and their perspective on the Osmotherly changes. Consistency over time was dependent on the recent experience of the SRO, either of past or impending accountability moments. This was relevant on those few occasions where they had just had a PAC hearing or NAO inspection or were expecting one. One area which may be affected by the process of interviewing is the priority given to the IPA as a forum. In many cases I was introduced to participants by the IPA or came to see them under the approval of the Cabinet Office. It is possible that the significance of the IPA as a forum was exaggerated as a result. This may be reflected in the percentage of SROs identifying it as a forum at figure 4.1 in chapter 4. However, even without the IPA backing to the research, the result might have been the same given the relevance of the IPA as an accountability institution to an SRO. I do not think this has significantly affected the interpretation of forum salience or positioning.

Reflexivity is essential to ensure reliability and validity within the research. The interview data was interpreted through my viewpoint. Whilst I would argue this did not necessarily have a major impact on the research outcomes it needed careful attention. Certain questions required me to think about my place as researcher and why participants said and described the incidents they did, why they were willing to meet me in the first place, and if they dealt with me differently because of my background. Having experience within the senior civil service and in project management provided a verbal shorthand that was useful from a shared experience of civil service metaphors. I was conscious to avoid adopting my past civil service persona too much so I could remain objective. I reflected on these questions whilst undertaking

the analysis and drawing up the thematic networks. My aim was to understand how SROs perceive their world and to express that in an authentic and trustworthy manner. Although recognising complete objectivity is impossible, I argue that this study reflects the difficult balance between understanding and depicting the situation authentically, whilst illustrating the environment in a suitably illuminating way.

However, this research took place during a specific period. The Osmotherly changes were introduced in late 2014 and had begun to take effect during 2015 as SROs accepted their letters of appointment. It is context specific, related to this group of officials at a particular time in the development of their profession, and the focus is on that project-based aspect of their roles. The interviews also took place within a period covered by two conservative led administrations and during a potentially tumultuous time in British political life. During the fieldwork the referendum on European membership took place in June 2016 and the interviews took place over the following 3 years. Although the interviews were conducted at the same time as the government was involved with the Brexit negotiations, they were not undertaken during a period of significant change within the government itself. However, this could limit any generalisations across other groups and times.

As the fieldwork drew to a close, there was a change of prime minister and substantial change within government. The topic of accountability began to be raised more frequently, often in an increasingly extreme manner, and these may indicate new perspectives developing within the community I was investigating. Similarly, the incoming administration's attitude towards major projects may be changing, reflected in the threats to cancel some GMPP projects (Swinford 2020, Freeguard et al. 2020), which are described in the epilogue. These developing attitudes amongst the participants, and a change to the GMPP itself, may limit any generalisation within the major project environment in the future. Although substantial change in the perception of SROs may be unlikely, repeating the fieldwork over future parliamentary sessions might reveal different perspectives. However, being held accountable in complex public sector environments, with multiple forums, is widespread. The results are likely to be generalisable across a variety of environments, as described in chapter 8. The approach

undertaken in this research, and the outcomes covering salience assessment, prioritisation, management strategies, and the value of understanding the endogenous nature of relationships will be relevant across many domains.

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Appendix 1. The 2016 Government Major Projects Portfolio

Source: Annual Report of the IPA (IPA 2016) and accurate as at September 2015. The key to department names is at the end of the list. The list is updated in subsequent reports (IPA 2019a, 2018a, 2017)

Department - Project Title

BIS   ICR Monetisation to sell part of the student loan book
BIS   Local Land Charges (LLC) Programme
BIS   New Polar Research Vessel
BIS   Project Eagle to sell the government's shareholding in Urenco, uranium enrichment company.
BIS   The Francis Crick Institute (formerly UKCMRI)
CO   Commercial Capability Programme
CO   Electoral Registration Transformation Programme to tackle electoral fraud
CO   FOXHOUND Programme, the cross-government IT shared service to enable working at Secret.
CO   GOV.UK Verify
CO   Government Office Hubs Programme will consolidate the office estate
CO   ISSC1 for back office operations by consolidating transactional services
CO   ISSC2
CO   National Cyber Security Programme
CO   New Civil Service 2015 Pension Scheme Implementation
CPS   ICT Restructure Programme
DCMS   Broadband Delivery Programme to 95 per cent of premises in the UK
DCMS   Mobile Infrastructure Project to provide economic growth through mobile voice coverage
DCMS   Super-Connected City Programme
DCMS   The Tate Modern Project
DECC   Carbon Capture & Storage Commercialisation Programme
DECC   FID Enabling for Hinkley Point C
DECC   Geological Disposal Facility Programme (GDF)
DECC   Magnox & RSRL PBO Competition
DECC   Sellafield Model Change (SMC)
DECC   Smart Meters Implementation Programme
DEFRA CAP Delivery Programme
DEFRA DEFRA Unity Programme
DEFRA Thames Estuary Asset Management Programme (TEAM2100)
DEFRA Thames Tideway Tunnel
DFE   Priority School Building Programme 1 (PSBP1) – Capital
DFE   Priority School Building Programme 2
DFE   Priority School Building Programme – Private Finance
DFID   St Helena Airport
DFT   A14 Cambridge to Huntingdon Improvement Scheme
DFT   Crossrail Programme
DFT   High Speed Rail Programme (HS2)
DFT   InterCity Express Programme (IEP)
DFT   Lower Thames Crossing
DFT   Periodic Review 2013 (Rail Investment Strategy – HLOS & SOFA)
DFT   Rail Franchising Programme
DFT   Search and Rescue Helicopters
DFT   Shared Services Implementation Programme
DFT   Thameslink Programme
DOH   100,000 Genomes Project
DOH   BT LSP
DOH   care.data
DOH   Care and Support Implementation Programme
DOH   Childhood Flu Immunisation Programme
DOH   CSC Local Service Provider (LSP) Delivery Programme
DOH   Electronic Prescription Service (EPS) Release 2
DOH   General Practice System of Choice (GPSoC) Replacement
DOH   Health & Social Care Network
DOH   Health Visitor Programme

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DOH	Liaison and Diversion Programme
DOH	National Pandemic Flu Service
DOH	National Proton Beam Therapy (PBT) Service Development Programme
DOH	NHS Choices
DOH	NHS Electronic Staff Record Reprocurement Project
DOH	NHS e-Referral Service
DOH	NHS Pension Re-let
DOH	NHS Procurement Efficiency Programme
DOH	NHSmail 2
DOH	PHE Science Hub
DOH	Visitor and Migrant NHS Cost Recovery Programme
DWP	Automatic Enrolment Programme (originally called Enabling Retirement Savings Programme)
DWP	Child Maintenance Group
DWP	Fit for Work (formally Health & Work Service) Programme
DWP	Fraud, Error and Debt Programme
DWP	New State Pension Project
DWP	Personal Independence Payment
DWP	Universal Credit Programme
FCO	ABUJA New Office and Residence
FCO	ICT Re-procurement
FCO	Movement of Personal Effects Contract
FCO	Technology Overhaul
FCO	UKERP
HMRC	Columbus (formerly Aspire Replacement Programme)
HMRC	Customs Declaration Services (CDS) Programme
HMRC	Tax-Free Childcare
HO	Adelphi Modernisation Programme
HO	Communications Capabilities Development Programme
HO	Cyclamen Project
HO	Disclosure and Barring Service (DBS) Programme
HO	Digital Services at the Border
HO	Emergency Services Mobile Communications Programme (ESMCP)
HO	Home Office Biometrics Programme
HO	Immigration Platform Technologies (IPT)
HO	SIS II Programme
HO	Technology Platforms for Tomorrow
MOD	A400M
MOD	Airseeker
MOD	Armoured Cavalry 2025
MOD	Armoured Infantry 2026
MOD	Army Basing Programme
MOD	Army Reserve Development Programme
MOD	Astute Boats 1-7
MOD	Carrier Enabled Power Projection
MOD	CHINOOK (incl. Project Julius)
MOD	Complex Weapons
MOD	Contracting, Purchasing and Finance
MOD	Core Production Capability
MOD	Crowsnest Programme
MOD	Cryptographic Enabling Services
MOD	EMPORIUM
MOD	Future Beyond Line Of Sight
MOD	GRAPEVINE 1
MOD	GRAPEVINE 2
MOD	Lightning II Programme
MOD	Logistics Commodities Services Transformation
MOD	Maritime Sustainment Programme

Appendix 1. The 2016 Government Major Projects Portfolio (Page 3)

MOD   MARSHALL
MOD   Merlin Programme
MOD   New Employment Model
MOD   Nuclear Warhead Capability Sustainment Programme
MOD   Operational Information Services
MOD   PUMA
MOD   Queen Elizabeth Programme
MOD   Spearfish Upgrade Programme
MOD   Successor SSBN
MOD   The Materiel Strategy
MOD   Type 26 Global Combat Ship Programme
MOD   WATCHKEEPER
MOD   Wildcat Programme
MOJ   CJS Common Platform
MOJ   CJS Efficiency Programme Phase 3
MOJ   Crime Change Programme
MOJ   Electronic Monitoring
MOJ   Future IT Sourcing Programme (FITS)
MOJ   HMCTS Compliance & Enforcement Services Project
MOJ   Integrated Delivery Programme
MOJ   HMCTS Reform
MOJ   Legal Aid Transformation
MOJ   NOMS ICTS Services (NIS) Programme (formally part of Quantum Re-compete Project)
MOJ   North Wales Prison
MOJ   Prison Unit Cost Programme
MOJ   Rehabilitation Programme
MOJ   Shared Services (ISSC2) Evolve
MOJ   Secure Training Centre (STC) Retendering
MOJ   Transforming Prisoner Telephony
NCA   Novo (NCA Transformation) Programme
ONS   Census Transformation Programme
ONS   Electronic Data Collection (EDC)
ONS   ESA10/BPM6 Programme (European Systems of Accounting)

Key to department names

BIS   Department for Business, Innovation and Skills
CO   Cabinet Office
CPS   Crown Prosecution Service
DCMS   Department for Culture, Media and Sport
DECC   Department of Energy and Climate Change
DEFRA   Department for Environment, Food, and Rural Affairs
DFE   Department for Education
DFID   Department for International Development
DFT   Department for Transport
DOH   Department of Health
DWP   Department for Work and Pensions
FCO   Foreign and Commonwealth Office
HMRC   Her Majesty's Revenue and Customs
HO   Home Office
MOD   Ministry of Defence
MOJ   Ministry of Justice
NCA   National Crime Agency
ONS   Office for National Statistics

Appendix 2. A Brief History of the Osmotherly Rules

The House of Commons Library is an independent research and information unit within

Parliament which provides information for use by MPs and their staff. They have published a

research document in the form of a 'Standard Note' explaining the origins and development of

the Osmotherly rules (Horne 2015). This appendix draws on that document and parliamentary

reports.

1970s	Rules drafted by Edward (later Sir Edward) Osmotherly, a civil servant in the Machinery of Government Division of the Cabinet Office (House of Lords 2012, 23)
1977-78	Procedure Committee recommends the creation of select committees bringing the rules to public attention. (Horne 2015, 5)
1980	Rules formally issued by government. (ibid, p. 5)
1988	New version published including guidance that civil servants could answer questions which sought to establish facts but not those that were intended to assign blame or criticism toward individual civil servants. (ibid, p. 5)
1994	Revised version issued 'Departmental Evidence and Response to Select Committees'. (ibid, p. 7)
1997	Revised version published. Following the Scott report into the export of arms to Iraq some clarification was suggested by the Public Services Committee report '*Ministerial Accountability and Responsibility*'. (ibid, p.8)
1999	Minor revisions and placed on Cabinet Office website. (ibid, p.8)
2005	New version published following review of the Hutton Report 2003, and the introduction of Freedom of Information legislation in 2000. (ibid, p.9)
2014	Current version issued. Followed developments arising from Civil Service Reform Plan (HM Government 2012), a report from the Liaison Committee (House of Commons 2102), and the House of Lords Constitution Committee (House of Lords 2012).

Appendix 3. Select Committee Hearings - 2015 and 2017 Parliamentary Sessions

Report	Department	GMPP projects at Select Committee	SRO attends
21/11/16	MOD	Type 26	x
31/3/17	DFE	Apprenticeships	SRO
10/7/18	BEIS	Geological Disposal Infrastructure	SRO
8/10/18	DFE	The apprenticeships ladder of opportunity	SRO
9/1/19	BEIS	Rolling out smart meters Inquiry	SRO
23/1/19	DWP	Pension auto-enrolment: update inquiry	x
11/3/19	DWP	Universal Credit and Benefit freeze	SRO
25/4/19	BEIS	Carbon capture, usage and storage (CCUS)	SRO
4/7/19	DOH	Review of NHS overseas visitor charging	x
25/10/19	DWP	Universal Credit and "survival sex"	SRO

The table shows the department and the date of the committee report. Those hearings which were attended by the SRO are indicated.

During the 2015-19 parliamentary sessions the average number of GMPP projects was 140. In the same period only 8 were called to a select committee hearing. This represents a 6% chance of being called within the total period or a 1.7% chance per year, which represents a 1 in 60 chance of any particular project being called.

Appendix 4. Public Accounts Committee Hearings - 2015 Parliamentary Session

Date of Report	Department	GMPP projects called to the PAC	SRO attends
28/10/15	DWP	Fraud and error stocktake	SRO
27/1/16	DWP	Automatic enrolment to workplace pensions	SRO
3/2/16	DWP	Universal Credit: progress update	SRO
4/3/16	HO	E-borders	x
23/3/16	CO	Transforming contract management	x
15/6/16	DFE	Free Entitlement to Early Years Education	SRO
27/7/16	DWP	Fraud and Error Stocktake: progress review	x
27/7/16	HMRC	The Aspire contract: progress review	x
14/9/16	DFT	High Speed 2	x
23/9/16	MOJ	Transforming Rehabilitation	x
19/10/16	CO	Shared Service Centres	x
4/11/16	DWP	Universal Credit: progress review	SRO
30/11/16	DFE	Apprenticeships	SRO
14/12/16	DFID	St Helena Airport	x
25/1/17	HO	Emergency Services Communications	SRO
1/2/17	DOH	NHS Treatment for Overseas Patients	x
3/3/17	DFT	The Great Western Railway	SRO
24/3/17	CO	The Crown Commercial Service	x
21/4/17	HO	Emergency Service Communications	SRO
28/4/17	DECC	Carbon Capture and Storage	SRO
28/4/17	HMRC	The HMRC Estate	x

The table shows the department and the date of the PAC report. Those hearings which were attended by the SRO are indicated.

During the 2015 parliamentary session there were 115 investigations and reports which involved hearings at the PAC. Of these, 21 were about GMPP projects, which represents 18% of the total. During this period there were on average 140 GMPP projects at any time and 19 separate projects were subject to a PAC hearing, with some appearing more than once. This represents a 14% chance of any project being called during the parliamentary session (which lasted 548 days) or a 9% chance in any year. This is equivalent to a 1 in 11 chance of being called in any year.

Appendix 5. Public Accounts Committee Hearings - 2017 Parliamentary Session

Date of Report	Department	GMPP projects called to the PAC	SRO attends
13/11/17	HMRC	Customs Declaration Service: progress review	x
13/11/17	BEIS	Hinkley Point C	x
14/11/17	HO	Emergency services network - progress review	SRO
13/12/17	DFT	High Speed 2 Limited Annual Report and Accounts	x
12/1/18	HMRC	HMRC performance in 2016–17 and HMRC Estate	SRO
19/1/18	MoD	Delivering Carrier Strike	SRO
24/1/18	MOJ	Offender-monitoring tags	SRO
31/1/18	BEIS	Carbon capture and storage: Progress review	SRO
23/2/18	DFT	Thameslink Programme	SROs
28/2/18	BEIS	Nuclear Decommissioning Authority	x
22/3/18	HO	Emergency services network - progress review	SRO
20/4/18	BEIS	Research and Development funding	x
20/7/18	MOJ	Transforming Courts and Tribunals	SRO
26/10/18	DWP	Universal Credit	SRO
1/4/19	DFT	Crossrail: progress review	SRO
24/4/19	HO	Disclosure and Barring Service: progress review	SRO
1/5/19	CO-GDS	The Government's Verify digital system	SRO
22/5/19	DFE	The apprenticeships programme: progress review	SRO
10/7/19	DFT	Crossrail	SRO
17/7/19	HO	Emergency services network	SRO
16/10/19	MOJ	Transforming courts and tribunals: progress review	SRO

The table shows the department and the date of the PAC report. Those hearings which were attended by the SRO are indicated. On one occasion (DFT-Thameslink) there were two SROs in attendance.

During the 2017 parliamentary session there were 119 investigations and reports which involved hearings at the PAC. Of these, 21 were about GMPP projects, which represents 18% of the total. During this period there were on average 140 GMPP projects at any time and 18 separate projects were subject to a PAC hearing, with some appearing more than once. This represents a 13% chance of any project being called during the parliamentary session (which lasted 702 days) or a 7% chance in any year. This is equivalent to a 1 in 15 chance of being called in any year.

Appendix 6. Organising and Global Themes

Global Theme		Organising Theme		Description
G1	General perspective	O1	Important and Difficult Jobs	Scale and complexity of the project makes job difficult
		O2	Complex governance	Blurred, matrix and multiple accountabilities
		O3	Personal aspects	Scrutiny, reputation, and blame
		O4	Legitimacy	Being accountable is appropriate, and positive
G2	Evaluating forums	O5	Evaluation attributes	The dimensions used to evaluate the relevance of forums
		O6	Categories of Forums	Combining attributes creates a typology of salient forums
		O7	Sanctions Regime	The nature of sanctions influences forum credibility
		O8	Dynamic Relationships	Relationships are dynamic and forum attributes change
G3	Categorising forums	O9	Definitive Forums	The most significant account holding entities
		O10	Important Forums	Dangerous, definitive, and dependent
		O11	Forums on the "watch list"	Dormant, detached, and demanding
		O12	Deemed Forums	Forums that have an emotional impact on the official
G4	Managing relationships	O13	Accept	Coping by accepting the demands as they arise
		O14	Clarify	Coping by bringing forums together to agree and clarify
		O15	Prioritise	Coping by prioritising, based on personal view or evaluation
		O16	Offload	Coping by passing accountability to others
		O17	Experience	Experience of projects or civil service makes a difference
G5	Osmotherly Rules	O18	Official Changes	The anticipated purpose of the rule changes and the reality
		O19	NAO audit and PAC hearing	PAC as theatre, where performance matters
		O20	Accountability Letter	Negotiating the SRO appointment letter and its impact
		O21	Action with Forums	How SROs use their "accountability" position

The table shows the 5 global themes identified from the interviews. The organising themes for each global theme are shown, along with a brief description. Each organising theme is also supported by a group of basic themes.