

# COMPARATIVE AND INTERNATIONAL ADMINISTRATION

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## REFLEXIVE WATCHDOGS? HOW SUPREME AUDIT INSTITUTIONS ACCOUNT FOR THEMSELVES

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Supreme Audit Institutions (SAIs) such as the UK National Audit Office and the French Cour des Comptes play important roles within the institutional mechanisms of the democratic state. They are given high independence in order to secure public accountability for, first, the probity and legality of public spending and, second, economy, efficiency and effectiveness. During the last twenty years several SAIs' mandates have been adjusted to reflect the latter, more managerialist, concerns.

This article asks two questions: first, what evidence do these SAIs offer as to the quality and effectiveness of their activities in carrying out their mandates and, second, to what extent does their self-reporting appear to have been influenced by the precepts of the 'New Public Management' (NPM)? To address these questions an analysis is carried out of the annual reports and other relevant documents of the Finnish, Swedish, French and UK SAIs, and of the European Court of Auditors. The analysis shows considerable differences of approach. These may well be related to the differing constitutional positions and administrative cultures of the SAIs concerned. In conclusion we identify different concerns which are associated with *either* a fervent embracing of NPM criteria by SAIs *or*, alternatively, with an apparent rejection of those approaches.

### INTRODUCTION

Supreme Audit Institutions – national bodies which have the power to hold other public organizations to account for the use of public funds and for their performance – play important roles in the political and administrative lives of their respective countries. Yet on the whole these organizations have not been the object of extensive interest by public administration scholars. The relevant academic literature could be described as 'limited but developing' (for example Harden 1993; Lovell 1996; National Audit Office 1996a; Roberts and Pollitt 1994; Power 1995; Wilkins 1995). There has also been some interest in the interface between performance audit and evaluation (Chelimsky 1995; Leeuw 1996; Pollitt and Summa 1997). Within this modest body of literature one set of questions that seems particularly

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neglected is that concerning how Supreme Audit Institutions (SAIs) hold *themselves* accountable. How do they justify themselves to their publics, and how far do they offer accounts of their own performances? Given the significant impacts which the activities of SAIs can have within government, and the general importance that is nowadays accorded to the performance and accountability of public bodies, an investigation into how the highest guardians of accountability and performance reflect upon their *own* activities seems overdue.

The principal questions we have set out to examine in this article are therefore how SAIs publicly account for their own performances, and how they justify themselves as prominent institutions acting within the wider arena of democratic politics and administration. Our main method has been a comparative reading of published documents from four national SAIs, those of Finland, France, Sweden and the UK. We have also looked at the European Court of Audit (ECA), which is a unique, supra-national audit institution responsible for auditing the institutions of the European Union. Although not technically an SAI its status and operations seems sufficiently similar to national SAIs to be included in the comparison. A comparative approach is warranted for the usual reasons: an examination of the similarities and differences between members of the same category (in this case Supreme Audit Institutions) almost invariably raises useful questions both about what causes individual members of the club to differ and about the nature and extent of what it is that links them together within the same grouping. More specifically, in this case, we already know that although our SAIs all belong to the same club (the name of the club is INTOSAI – International Organisation of Supreme Audit Institutions) the status and precise mandates of individual SAIs actually vary significantly (Wilkins 1995; National Audit Office 1996a). One question is therefore whether the way in which an SAI is positioned within the apparatus of the state in question – together with the nature of that apparatus – influences the way that body accounts for its own activities to democratic institutions and the wider public? Another question, given the considerable advance of the ‘New Public Management’ in many European countries, is how far the emphasis this movement gives to issues of performance and quality has been apparent ‘in house’, within the work of SAIs themselves?

## APPROACH

We have looked in some detail at what seem to be the most relevant published materials from our four SAIs plus the ECA. The subset we have concentrated on consists of the annual reports produced by each of these SAIs plus the official handbooks, ‘guides’ or brochures describing the work of each body to the general public. We refer to this collectively as ‘self-explanatory material’. This material has been analysed from two perspectives. First, we have looked to see whether the reports contain any overall

performance indicators or related information on results achieved for the SAI in question. Thus, for example, do they offer measures or indicators for their own economy, efficiency, effectiveness or quality? Second, we have looked at the argumentation displayed in the material, examining it to see what kind of assumptions it appears to make about the roles of SAIs in question and what kind of justifications, explicit and implicit it seems to offer. We have not examined the individual audit reports, since these seldom if ever contain much reflexive material. However, this work has been a small offshoot of a larger, team project in which the audit reports of these and other SAIs will be subject to detailed comparative analysis (see Acknowledgement).

We examine only four national SAIs and the European Court of Audit. Furthermore, looking at annual reports is not a procedure that can be applied uniformly across all SAIs, because not all of them produce annual reports. Nor do they all produce explanatory booklets or brochures (and certainly not in similar formats). Even where annual reports *are* produced their nature and purposes vary (National Audit Office 1996a, pp. 254–6; see also later discussion). Our research thus mainly confines itself to a reading of formal documents and does not attempt to penetrate further by interviews, observations or other, more intrusive methods. Thus we do not deal with the rationalizations and justifications that state auditors offer in conversation or interview in order to legitimize their institutions and activities.

Although the concept of ‘representativeness’ is hard to apply to SAIs (since their constitutional contexts, powers and institutional locations vary so much) it could nevertheless be said that our set of five institutions includes examples of the principal types of European SAI. Thus the UK National Audit Office (NAO) is an independent statutory body headed by a Comptroller and Auditor General who is an officer of the House of Commons. Its reports are addressed to the Public Accounts Committee of the House of Commons. The Swedish and Finnish SAIs (the RRV and the VTV respectively) are, by contrast, located as parts of the machinery of executive government – though with carefully defined statutory independence. Both are positioned within the jurisdictions of their respective Ministries of Finance. In both systems there is also a smaller parliamentary audit organization. The French Cour des Comptes has the legal status of a court, and is one of the oldest and most prestigious institutions in the French system of government. Its constitution indicates that it should assist both Parliament and government in supervising the implementation of the state budget. Of its 500 staff, 250 are magistrates, appointed for life by decree from the President of the Republic. The European Court of Audit is unique, a supra-national audit organization. It is one of the five principal institutions that make up the European Union. It is a collegiate body of 15 members, headed by an elected President.

Our set of five therefore represent the four main types identified in a

recent survey of the audit bodies of the European Union member states – the court with judicial functions, the collegiate body, the independent audit office reporting to a Parliament and the audit office within the structure of executive government (National Audit Office 1996a, p. 234).

## **DO SAIs HAVE PERFORMANCE INDICATORS?**

In this section we will examine the annual reports and other self-explanatory material published by each SAI to see to what extent they contain or suggest specific indicators by which the reader can assess the overall performance of the SAI in question. To illustrate the (wide) range of practice it may be useful to begin with an overview of two annual reports which are very different in terms of the provision of performance information. The reports of the European Court of Auditors (ECA) and the UK National Audit Office seem to represent two opposite approaches to whether and how a SAI accounts for its performance.

## **THE ECA AND THE NAO: TWO OPPOSITE APPROACHES TO PERFORMANCE INFORMATION**

The 1995 Annual Report of the European Court of Auditors (European Court of Auditors 1995) is a very substantial document (328 pages) but one that essentially gives no information at all about the performance of the ECA itself. Less than one page is given over to the discussion of the 'The General Context of the 1994 Annual Report' and 'The Structure of the Annual Report'. Even these short sections make only the briefest mention of the role of the Court. The report subsequently develops into a long sequence of summaries of particular audits which have been carried out, accompanied by the comments of the European Commission on these audits. Nowhere in the report is there any trace of self-justification by the ECA or of any information about the costs, quality or impacts of the audits. The nearest the report comes to any measure or account of its own performance is the provision of a complete list of the reports it has produced over the previous five years (pages 313–21). The only two, tiny, exceptions to these generalizations are to be found on pages 8 and 9 where the Court notes that it is not possible to quantify 'with any real certainty the real benefits that could result from more efficient and better targeted financing'. It goes on to make the following claim, although this is not backed up with any statistics:

Given the limited extent to which the Court, with the number of auditors at its disposal, can audit financial management in any one year, it is clear that there is great scope for improvement and that any costs incurred in securing such improvement would be recovered in a very short time (European Court of Auditors 1995, p. 8).

On the following page there is a brief discussion of the Court's role with respect to fraud, but this does not contain any performance information either. Towards the end of the report one finds a short note to the effect that the revenues and expenditures of the ECA have been externally audited (p. 313).

The Annual Report of the UK National Audit Office (National Audit Office 1995) represents an almost opposite practice of self-justifying information and reporting on its own performance. This report is shorter (40 pages) but displays a consistent concern with justifying the work of the NAO and attempting to identify and measure the benefits that flow from it. Indeed, the report begins with a section discussing the 'role and objectives' of the NAO. It then has substantive sections discussing, respectively, financial audit and value-for-money audit. Each of these sections contains a considerable quantity of performance information. The section on financial audit has a sub-section headed 'Results and Impact' in which a number of cases in which audited bodies have responded to NAO findings are described. It is noted that savings and economies identified during the financial audits carried out during 1994 amounted to a total of £13 million. There is also a sub-section headed 'Costs and Quality'. This claims that the NAO has further reduced the average cost of certifying an account whilst continuing to ensure high professional standards through improved training for auditors. It also notes that private sector auditors are used to support about 10 per cent of the NAO's financial audit work (through contracting out), helping to provide a measure of cost effectiveness and flexibility.

The section of the report dealing with value-for-money audit also contains sub-sections on 'Results and Impact' and 'Costs and Quality'. At the beginning of this section some emphasis is placed on the NAO's usefulness to auditees: 'The focus of this work is on reporting to Parliament but we also aim to help audited bodies to improve their performance and achieve better value for money' (National Audit Office 1995, p. 13). This particular emphasis seems to have increased further in the latest report (National Audit Office 1996b). In the 1995 report there is also a discussion of the different ways in which the impact of value-for-money work can be assessed. It is noted that, although this impact cannot *always* be quantified in monetary terms, many of the improvements that result *are* measurable. A table is displayed showing how the measurable savings resulting from value-for-money audit have climbed from £204 million in 1992 to £256 million in 1994. So, overall, the NAO cost £36 million (net) and 'saved' £269 million, a savings ratio of nearly 1:7.5. Furthermore it is recorded that during 1994–95 the government accepted 95 per cent of the recommendations of the Public Accounts Committee (the Parliamentary Committee that receives the NAO's reports). Finally, there is a discussion of how the NAO undertakes internal quality reviews of its work using independent quality panels and surveys of audited bodies to seek their opinions of the usefulness of NAO activity.

Later in the 1995 report the NAO returns to the theme of self-justification. Under a section headed 'Use of Resources' it claims that: 'Over the past five years we have consistently delivered more outputs than planned while reducing the average cost of our deliveries and our overall cost in real terms' (National Audit Office 1995, p. 27). Quantitative and qualitative information is given concerning the efficiency planning that goes on in the NAO, the increases in workload it has undertaken and the fall in its gross costs.

The conceptual starting point of the NAO's report is obviously different from that of the European Court of Auditors: both are called 'annual reports' but the NAO reports on its own performance whereas the ECA gives a summary of the substance of its work during the past year. Besides this conceptual difference, or difference in the purposes of the reports, the whole 'feel' of them is also startlingly different. The NAO document is attractively produced and illustrated, and written in a style that is obviously designed to appeal to a general audience whose prime interest is not in the technical details of individual audits.

It would be wrong to jump to too many conclusions solely on the basis of this contrast between the annual reports of the NAO and the ECA. As indicated above (under Approach) we have looked at general SAI publications as well as annual reports. When these are taken into account the contrast lessens somewhat. The ECA publishes a glossy, colourfully illustrated 43 page booklet entitled *European Court of Auditors: Auditing the Finances of the European Union* (European Union 1995) and the NAO publishes a similar general handbook (NAO 1990).

At first sight the ECA booklet seems easily to make up for the 'reflexiveness deficit' of its annual report. However, if one poses the narrower question about the presence or absence of performance indicators the appearance of reflexivity is reduced. The booklet gives details of the Court's organization, the types of audits it undertakes, the methods it uses and the criteria by which it selects topics for its work programme. Yet in all this there is not a single quantified indicator by which one could measure the efficiency, effectiveness or quality of the Court's activities. The only figure that is offered in respect of the ECA itself is an input figure – the cost of running the Court, which in 1995 amounted to 52M ecu, or 1.3 per cent of the administrative expenditures of the European Union (p. 10).

The NAO also produces a general booklet, *Helping the Nation Spend Wisely* (National Audit Office 1990). It is shorter and less informative than the annual report. Nevertheless it cites specific figures for savings in public expenditure resulting from both financial and value-for-money audits. It also discusses the 'stimulus' effect its work has on departments and points out that: 'if the impact of our work were to improve the value for money by departments by no more than a fraction of one per cent there would be benefits worth hundreds of millions of pounds a year – such is the scale of the field covered' (NAO 1990, p. 7). It would therefore be fair to say

that the NAO displays a much more pronounced awareness of possible advantages of justifying its activities in managerial terms (the 3 Es) than does the ECA, and that this difference between the two bodies is easily visible both in their annual reports and in their basic information booklets.

## THE MANAGERIALIST APPROACH: JUSTIFICATION BY GOOD PERFORMANCE

The way that the Swedish Riksrevisionsverket (RRV) and the Finnish Valtiontalouden tarkastusvirasto (VTV) approach accounting for their performance is close to that of the NAO, yet each of them has their own conception of what kind of performance information it is necessary and possible for an audit institution to produce. The RRV and the VTV are constitutionally in similar positions, both being organizations within executive government, but with statutory independence for the content of their work. Both of them have also played an active role in the public management reforms of their respective countries. The RRV not only audits but also develops and supports the development of performance information in government authorities, which has been required of all departments and agencies since the launching of the 'result-oriented management and budgeting' model in the late 1980s. Likewise the VTV has adopted a practice of annual financial audits which focuses, among other things, on the quality of performance information produced by agencies as well as on how closely the practices required by the newly introduced result-oriented management model are followed by agencies and ministries.

The RRV publishes an annual report (*Årsredovisning 1994/95*, RRV 1995a) which is quite similar to that of the NAO in the sense that its explicit purpose is to account for the office's performance during the past financial year. Publishing this annual report (a more accurate translation of its title would be an 'annual account of results') is based on a decree that requires all government agencies to give such a report for each budgetary year. Thus in this sense the Swedish audit office is subject to similar statutory reporting obligations to any other government office. Besides the annual report, the RRV publishes two other documents which give information of the office's results: an annual account [of audits] (*Årlig rapport*, RRV 1995b) which summarizes the findings and observations made in the past year's audit work, and a publication given every three years (*Resultat av tre års förvaltningsrevision*, RRV 1995c) that presents an in-depth analysis of the results and effectiveness of the office's audits.

The RRV's annual report for budgetary year 1994/95 first gives an overall description of the office's goals and activities as well as an assessment of the results achieved. The focus in assessing results is on effectiveness, which is measured by the share of the office's observations and remarks which led to measures taken by the responsible authorities. A high percentage of such remarks is considered proof of the usefulness and importance of the

office's work: 'The share of observations that have led to measures is high (90 per cent). This is a sign that the annual audits are well received, not least because of their increased focus on advisory activities, and that they lead to a (less risky) and more effective state administration'.

The overview also gives a fairly detailed list of the activities performed by the office and a description of its economy and use of resources. It then proceeds to a more detailed explanation of the performance and achievements of all its four divisions. The RRV is divided into four sub-units: the annual financial audit division; the performance audit division; the 'economy and result-oriented steering' unit (with responsibilities for development, support to agencies and ministries, advisory work and information to the government) and a fourth sub-unit responsible for international activities. Each of these units gives a detailed report of their accomplishments during the year. They also indicate their use of resources and costs incurred, including a statistic on unit costs, plus an assessment of the effectiveness and the quality of their work. Both the audit units show how many observations they have presented and how many and what percentage led to measures taken by the auditee or the responsible decision maker. In the financial audit division this 'effectiveness percentage' is calculated for measures taken within one year from the audit, and it is higher (90 per cent) than in performance audit (61 per cent), which calculates the percentage for measures taken within three years from the audit. Besides the statistic presented in the annual report, the performance audit division refers to another annual publication (RRV 1995c) which, report by report, gives a review of the measures resulting from each audit. Both the financial audit division and the performance audit division also present a statement of the quality of their work, the former pointing out how they have taken account of the wishes of auditees reported in a recent questionnaire, and the latter reporting how they have recently finalized a code of ethics and quality assurance. The performance audit division is also on its way to establishing a quality barometer based on regular customer surveys, which will indicate how agencies and departments assess the usefulness of RRV's performance audits.

The third sub-unit of the RRV, the 'economy and result-oriented steering' division, which has a more mixed set of responsibilities than the other two sub-units, follows the same logic as the other two, but with less precision and with more verbal, descriptive statements about achievements. Like the other two sub-units, they present a detailed list of their products and the unit costs for these, but as to quality and effectiveness, for obvious reasons, instead of any specific measure they only list missions and improvements accomplished. The same is true for the fourth sub-unit, international activities.

As a whole, the RRV's annual report can be seen to reflect the openness of Swedish administrative culture, the principle that everything that public bodies do should be transparent and open to the assessment of the general public. The tone of reporting in the annual report reflects a striving to give



very exact and detailed performance information, but the idea of how to report is more a minute listing of everything done than an analytical approach based upon summarizing indicators. The need for justification in managerial terms, as in the NAO's case, is clearly displayed. As with the NAO, there is an attempt to focus on effectiveness in performance information, but there is a difference of degree in how these two SAIs conceptualize effectiveness: the NAO mentions how many of its recommendations are accepted by government but puts its main stress on the 'savings' rate whereas the RRV does not report savings but concentrates instead on the 'reaction rate'. What is fairly obvious to anyone who has experience of the administrative process (which is not discussed on the surface of any of these documents) is the problem of conceptualizing and measuring 'savings'. In many cases it must be extremely difficult confidently to identify, quantify and separate out the specific contribution made by an audit investigation (as opposed to a host of other influences) to an administrative innovation that saves expenditure).

If we turn now to the State Audit Office of Finland (VTV) we find another example of an SAI which, in terms of reflexivity, is closer to the NAO and the RRV than to the ECA. It, too, produces both an annual report (State Audit Office 1995a) and a general introductory booklet (State Audit Office 1995b). Both these documents are obviously concerned to convince their readers that the VTV does indispensable work, but the quantified information offered in support of this position, though much greater than that visible in the equivalent ECA publications, is less than what is provided by the NAO or by the RRV. As was the case for the RRV, the VTV's annual report is also a statutory publication, required by a decree, which obliges all state agencies and ministries to publish an annual document reporting on how they have achieved the targets set for them for the past budgetary year.

The bulk of the VTV annual report is presented in three chapters entitled 'Performance and Costs' (chapter 2), 'Achievement of Objectives in the Area of Financial Auditing' (chapter 3) and 'Achievement of Objectives and Effectiveness in the Area of Performance Auditing' (chapter 4). These certainly contain quantitative data about the VTV's activities but, on closer inspection this data does not contribute much to our understanding of the efficiency, effectiveness or economy of the auditing. There are none of the figures for savings which feature so prominently in the NAO's publications. Neither is there any record of how many of the VTV's recommendations were accepted by the ministries or agencies concerned. The two measures which *do* feature are the *cost* of audits and the *time taken* to conduct them. The annual report shows that the average cost of a day's financial audit declined considerably between 1993 and 1994, while the average cost of a day's performance auditing also fell, but only by a small margin. On the time measure, figures are given to show how the average number of person

days taken to complete a financial audit fell from 66 to 52 days, though no corresponding figures are shown for performance audits.

The VTV's annual report offers virtually nothing on effectiveness. Yet, it clearly wants to acknowledge the importance of this component of performance information, even if the most that can be found to say about it is that: 'the third component (apart from quantity and cost) – the effectiveness of auditing activities – is difficult to measure but is a key measure nevertheless' (State Audit Office 1995a, p. 10). The report goes on to state that the evaluation of quality and effectiveness objectives is being further developed. It seems as though the results are still to be awaited, since the following years annual report (State Audit Office 1996) repeats exactly the same comments on how performance should be accounted for.

The VTV's General Introduction booklet is slimmer and less glossy than those of either the ECA or the NAO. In terms of performance information it adds little to the annual report. Again figures are offered as to the time taken for different types of audit and it is shown that in 1994 53 per cent of the VTV's time was to be spent on performance audits as against 41 per cent on financial audits.

Overall, therefore, the VTV documents show no efficiency ratios and no impact or effectiveness measures. However, they do show a definite *consciousness* of the desirability of providing assurance on these managerial dimensions, in a way that is not to be found in the ECA material.

## THE CONSTITUTIONALIST APPROACH: OVER AND ABOVE PERFORMANCE MEASUREMENT

Moving on to the French Cour des Comptes (CdC), here we find an institution whose provision of reflexive performance information is definitely closer to the (minimalist) ECA model than the NAO or the two nordic audit institutions. Each year the CDC publishes a lengthy annual report (Cour des Comptes 1995) plus a résumé of that report intended for use by the press. A document of almost 500 pages, the annual report consists of a series of summaries of the CDC's findings on particular topics, each followed by the comments of the auditee. Like the corresponding report of the ECA, it contains no performance information whatsoever about the CDC. Compared to the ECA, what makes the CDC's report still more distant from the idea of accounting for its own performance, is the fact that what appears in the public domain is only a carefully selected subset of the organization's reports, many of which remain a confidential matter between the Cour and the auditee concerned. Thus not even a diligent analyst who went through the whole report in detail, could claim thereby to have acquired a balanced appreciation of the CDC's activities. Only in a three page preamble is there any degree of reflexivity concerning the work of the CDC. This preamble offers a descriptive essay on the changing balance between the different types of work undertaken by the Cour. The only quantitative information

it contains is account of the number of reports the Cour has examined during the year (757) and the number of decisions it has rendered (388), subdivided into major categories.

The CDC has also published a number of short leaflets describing different aspects of its work. The two most relevant for our purposes are those entitled *The French Cour des Comptes* (1994) and *Audit Standards and Methods* (1991a). Neither leaflet offers any quantitative information, and neither do they suggest any indicators or criteria by which the work of the CDC might be judged by outsiders. The short note on *Audit Standards and Methods* might be expected to say something about the standards by which a 'better' audit could be distinguished from a 'weaker' one, but in fact it emphasizes the scarcity of written standards and the reasons why it is wise, in the view of the CDC, to allow highly trained auditors 'to dispense with detailed guidelines which might be necessary for auditors of a lesser level'.

Looking at our sample of five SAIs as a whole, it seems that two 'camps' of audit institutions can be distinguished on the basis of their attitude towards the need to account for their own performance. In the 'constitutionalist' camp – here represented by the French CDC and by the ECA – the audit institutions seem to put themselves over and above performance assessment directed at their own work, concentrating on their public discussions with their 'client' institutions, on the observations they make in the substance of their work, and limiting discussions on themselves to descriptions of a general nature. In the 'managerialist' camp – here represented by the UK NAO and by the Swedish and Finnish State Audit Offices – there is a strong need to justify by giving details of the results achieved and by the value-added for the public sphere. A sub-theme within this line of argument is that of the SAIs' direct usefulness to the audited bodies (especially for the RRV and NAO).

## SELF-IMAGES OF THE AUDITORS: JUSTIFICATION BY WORKS OR BY STATUS?

Having identified the two 'camps' of SAIs, each with its own approach to accounting for performance, we now proceed to a broader overview of how SAIs justify their work and status as authoritative and powerful public institutions. In this section we will look at the self-explanatory materials of our sample of five SAIs in order to identify the basic features of the images they are trying to create when introducing themselves and describing their achievements in documents that are meant to be read by the wider public. We will read the annual reports and the brochures of the four SAIs and the ECA with an eye to the *ethos* of the texts of these publications. *Ethos* is a concept used in Aristotelian rhetorics to describe one of the three means of persuasion that are available to a speaker trying to make an audience support his argument. By *ethos* scholars of rhetoric mean those aspects of a text or a speech which aim at giving the audience a credible and trust-

worthy image of the rhetor and his purposes; it describes what kind of a 'face' he wants to show to his audience. The other two means of persuasion are *pathos* and *logos*, meaning respectively those aspects of a text which aim at making the audience more adaptive to the argument to be presented by, for example, appeals to its emotions, and the substantive content of the argument itself. Yet, in practice it is not always easy clearly to distinguish between the three means of persuasion (Summa 1993).

Even if the materials from the five SAIs we are looking at are different as to their purposes and as to how they have been produced (regularly as part of the annual planning and monitoring cycle – as is the case for the annual reports of the RRV, the NAO and the VTV – or as a separate effort for PR or other external purposes – as is the case for the brochures for ECA and the CDC) they can all be read as self-explanatory texts with an *ethos* specific to the SAI concerned. When trying to capture the *ethos* of the self-explanatory texts of the different SAIs we will look at:

- how they define themselves and their roles in the context of other public institutions;
- the purposes and interests they claim to serve; and
- the qualities they attach to themselves and their work when constructing their public image as 'experts' in their field.

All the SAIs in our sample give some kind of an answer to the question 'who are we' – defining themselves and their role in the particular setting of public institutions in which they work. The answers they give to this question differ, both as to content and in respect of the effort put into persuading the audience to accept their projected image. Some SAIs are satisfied to state briefly the juridical basis for their existence and authority, whereas others enter into a more elaborate discussion about their role and mission, attempting to create a positive image of themselves – and, obviously, at the same time to get rid of the bureaucratic, disciplinary and negative imprinting traditionally attached to auditors.

The most systematic effort to prove the necessity and legitimacy of its existence is made by the ECA in its booklet *European Court of Auditors* (1995). The ECA's booklet starts with an almost text-book-like presentation of the general purposes and functions of external auditing of public funds, and continues with a carefully worded answer to the question 'why is a European Court of Auditors needed?' In these two first chapters of the booklet the ECA advocates a broad conception of the objectives of auditing, emphasizing its task not only as control but as support for improving management. The combination of the general functions of external audit, and the specific historical situation of the European Communities when the ECA was created, generated the need for a European external audit institution as an equal member in the family of European institutions. So, the ECA is able to introduce itself as a natural and logical necessity following from the existence of an autonomous European Union budget. It is also proud to

repeat the metaphor that was used at the time of its inauguration by the (then) President of the European Court of Justice: 'In short, the creation of the European Court of Auditors illustrated the Community's need for a 'financial conscience' . . .' (ECA 1995, p. 7).

Even if the CDC and the ECA have a fairly similar approach in accounting for their own performance, they seem to have a different attitude towards the need to justify their work in more general terms to the broader public. The CDC's self-explanatory material is scarce compared to the other four SAIs, and the style and presentation of the notes that serve this purpose are considerably less accessible than those in the comparable documents from the other SAIs. The notes presenting the CDC and its audit methods do little to persuade a wider audience to believe that the CDC is a necessary and useful institution. The CDC grounds its justification on its long history and on its formal 'rank' among the most powerful institutions of the state. The text in which the CDC introduces itself starts with a glance at its founding in 1318 by King Philip V and restoration by Napoleon, and goes on to define its constitutional relations to the other highest bodies of the state as well as pointing out its 'rank': 'It ranks, together with the Council of State and the Cour de Cassation, as one of the *Grand Corps de l'État*, the position and influence of which are second only to those of the highest political powers of the State'.

Another special feature in the CDC's way of introducing itself is the emphasis it puts on assuring its audience of the high qualifications and extraordinary status of its audit staff, the magistrates. Most of them have pursued postgraduate studies in the ÉNA, they all enjoy a judicial status, and because of their special qualifications, they are not dependent on written standards for the performance of high quality work. Thus the CDC's answer to the question 'who are we' puts more emphasis on its status and rank than functionality, usefulness or support or benefits to other public bodies, the political decision makers, or, indeed, the general public. They do not put forward any idea of 'serving' anybody.

The UK NAO has, like the ECA, put considerable effort to giving the general public a positive image of itself. This is done in the booklet *Helping the Nation spend wisely* (National Audit Office 1990) the title of which is already indicative of how the NAO wants itself and its mission to be conceived. In introducing itself the NAO emphasizes functionality and usefulness – benefits to the Parliament and ultimately to the taxpayer – much more than its institutional position or status. Unlike the CDC brochure, the NAO booklet tells much more about what the NAO does, how it does it and what benefits it produces than about its 'static' situation as one of the central bodies among the institutions of the democratic apparatus of the UK. Its long history, dating back to the appointment of the first Comptroller and Auditor General of the Exchequer in 1314 (just four years before the CDC!) is mentioned, but in the NAO's self-explanation this historical fact has more the character of a lightening detail than a solemn guarantee of

its credibility. The NAO immediately proceeds to describe itself through what it does: 'Today, our primary concern is accountability to Parliament, and ultimately to the taxpayer – to assure them that public funds and resources are used properly and to good effect'.

Like the CDC, the NAO gives a short account of its staff, telling something of their numbers and basic education. But instead of praising their exceptional qualifications as the CDC does, it goes on to emphasize the effort put into the continuous training and development of its staff and the well-planned systematic nature of its training programme. Thus, as a whole, the NAO's strategy of creating an image of itself is in many ways opposite to that of the CDC: the NAO concentrates on justification by achievements and effectiveness, while the CDC seems to have no need for this kind of legitimation. As to the ECA, it seems to be trying to do both – to offer an image of a body which both does useful things and as a necessary and indispensable institution in its own right.

In their way of introducing themselves, the two nordic SAIs are clearly closer to the NAO than to the 'constitutionalist' SAIs. Their annual reports concentrate more on describing activities than their status or statutory authorities. Yet both these documents begin with an introductory chapter which describes their mission statements and overall goals. Both of them introduce themselves as independent 'expert organizations' which are working as intermediators of information for the better 'effectiveness of the state', producing knowledge that will be of practical value for decision makers. The RRV's mission statement says that:

We shall work for effectiveness in the state and in the state's activities as well as for purposeful management of the economy of the state administration. The RRV shall, through intermediation of information, advice and support to the departments, to government agencies, etc. work to the effect that purposeful measures will be taken (RRV 1995a, p. 2).

While the VTV states that:

The office promotes economy, efficiency and effectiveness in state administration by conducting audits and expert tasks related to the control of financial management. . . . Auditing activities produce such new information that can be put into practical use and that can be expected to result in considerable economic benefits (State Audit Office 1996, p. 6).

After these broad descriptions, they describe how the offices are organized to perform these tasks, and how each of their sub-units performed during the past year. An interesting difference from the other three SAIs is the way both the RRV and the VTV conceptualize their positions among the various institutions of the state machinery. The nordic authorities describe themselves as working for the 'state' or for the better man-

agement of the state's finances, without emphasizing their position in the hierarchy of democratic institutions. Thus, the

RRV is a central authority for audit and accountability in the state. This means acting to promote a state administration that is reliable and purposeful. This also means working for the effectiveness of the state and the state's activities, as well as for a high quality steering of results and economy of the state (RRV 1995b, p. 2).

Similarly, the VTV:

an independent and neutral expert organization for the audit of financial management. . . . The office strives to contribute to all the levels of control of the administration having reliable and sufficient information on the state of administration and on the results and effects of the different activities of the administration (SAO 1996, p. 6).

None of the other three SAIs speak about the 'state' or the 'administration' in such a lump sum manner, but rather place themselves in a clearly defined position in the apparatus of democratic institutions, being more exact about which institution is their 'principal' or primary 'client' and about what is their status among the hierarchy of public bodies. The RRV and the VTV introduce themselves more as general guardians of sound financial management of their 'states', and the RRV particularly as an all-purpose 'helper' to improving the economy and management of public organizations.

## THE MISSIONS OF THE SAIs

The second question concerns the *ethos* of the SAIs in our set – what purposes and whose interests are they serving? Here also we can also identify different logics of argumentation. This is not a matter of objective differences in the constitutional tasks and formal positions of the SAIs, but of what kind of expressions they choose when describing their 'missions' in a less formal text. There are differences, for instance, in the primary beneficiaries named by the different SAIs and in the clarity with which they identify the specific beneficiaries they serve.

The above mentioned tendency of the two nordic SAIs to define themselves rather as general guardians of sound financial management rather than as 'agents' of any specific principal is also reflected in their rhetoric identifying beneficiaries. Neither of them gives a specific, single institution or beneficiary whom they would report to or be responsible for. Rather they emphasize that their work is useful to *all* levels of government and *decision makers* in general. For instance, the VTV's *General Introduction* booklet (SAO 1995b) states that the 'Office safeguards the public interest', 'audits produce information needed by Parliament and by the Government and the administrative units responsible to it'; and serve 'the information needs

of the controlling authorities'. A graphic presentation shows that the VTV's audit reports are delivered to the Parliamentary Auditors and to the Council of State, but this aspect is not commented upon further in the brochure. In its annual reports (both 1995 and 1996) the VTV states that it strives to contribute to *all* levels of control of the administration by collecting reliable and sufficient information about the performance of public bodies. Later on in the same reports it characterizes its work as follows: 'Both financial and performance audits are . . . aimed primarily at ensuring the monitoring of the owner's interests, just as in the case of corporate audits' (SAO 1995a and 1996, p. 7). What is understood by the 'owner' is defined only indirectly in the next paragraph of the report, in which the VTV describes how its financial and performance audits also serve the Parliament, which 'exercises supreme ownership power' (*ibid.*).

In a somewhat similar way, the RRV states in its annual report, in the overall review of the Auditor-General, that 'Our task has been to offer as good as possible a basis for decision making so that the *government and other decision makers* would be able to achieve these goals' (RRV 1995a). The RRV is offering its advice and support to 'departments, to government agencies etc.' – that is, to anybody who is willing and able to take measures to improve the economy of the state. It envisages this relationship as one of independence (for the RRV) but also closeness. In its description of performance audit, the RRV explains that: 'the auditor listens to arguments and responds in a dialogue with the organisation' (Swedish National Audit Office 1995, p. 11).

The CDC's approach to defining interests and purposes is – as it was in the other aspects of its image-creation – short-worded and juridically toned: 'The main task of the Cour des Comptes, according to the Constitution, is to assist Parliament and Government in checking the proper execution of the State budget' (CDC 1994, p. 2). The CDC does not speculate about who might be the beneficiaries of its work, nor does it elaborate on the purposes it is serving by its audits. The CDC has a multiple, hierarchical system of communicating its audit observations to different levels of administration and decision-makers, the addressee of the observations depending on the order of magnitude and seriousness of the findings. The CDC's explanatory note (CDC 1994, pp. 5–6) describes the alternative procedures for dealing with audit observations, but there is no discussion of how the various recipients of their reports might use them. The impression that the CDC gives of itself is that most of its activities are performed 'behind the stage', and are matters between the CDC and the auditee, aiming in many cases at direct rectification of mismanagement or other problems. The CDC publications do not try so hard to court a wider audience and improve the latter's understanding of its observations or its mission. Thus, even if the nordic SAIs and the CDC seem to be similar in their brevity and vagueness, the philosophies behind their argumentation differs sharply. The nordic administrative culture is characterized by openness, which is reflected, among



other things, in their SAIs' willingness to serve all interested parties in an equal way. The French administrative culture, on the other hand, is more secretive and apt to achieve its results by negotiations behind the scenes.

A striking difference in the three cases described above is the NAO's and the ECA's way of conceptualizing their purposes and the beneficiaries of their work using the concept of the 'taxpayer'. The VTV, the RRV and the CDC never mention the taxpayer in their self-explanatory materials, whereas s/he is a central figure in the NAO's argumentation. The NAO points out clearly its relationship to the Parliament, which is the primary recipient of its audit results. Yet even so, the ultimate concern is the taxpayer's money: 'Our objective is therefore to give assurance, information and advice to Parliament on the way government departments and other public bodies use and account for taxpayers' money' (NAO 1990, p. 3).

The ECA, for its part, connects its mission to the 'double aim of improving results and accounting to the taxpayer for the managing authorities' use of public funds' (ECA 1995, p. 4). The ECA is formally one among the five institutions of the Union and reports its findings to the European Parliament. Its discharge procedure and resolution are binding on the other European institutions. In the ECA's self-explanatory argumentation the annual discharge procedure based on its statement of assurance and followed by a parliamentary resolution, ultimately makes the ECA an efficient guardian of the European taxpayer's interests: 'The European institutions are required to follow up the observations contained in the European Parliament's resolution and take steps to safeguard the European taxpayers' money by improving the quality of management systems and adopting the necessary measures to protect Union finances' (ibid, p. 32). A special feature in the ECA's argumentation, compared to the national SAIs in our set, is the way in which it links its purposes to ensuring that the activities of the public sector are conducted democratically (ibid). This may be a reflection of the 'post-Maastricht' ethos, a contribution to reducing the alleged 'democratic deficit' in the administration of the EU. No other SAI in this set so explicitly represents itself as a guardian of democracy.

## THE QUALITIES OF THE SAIs

In this section we try to capture some of the SAIs' characteristic qualitative statements about themselves and their work when they are creating their images of expertise and excellence. To put it slightly differently, we focus on the qualities the SAIs mention when praising themselves. Here too, we observe different 'philosophies' between the two 'camps' of SAIs but also one similarity in our set.

The most obvious similarity is that *all* the SAIs emphasize their independence from any other decision makers for the content and targets of their work. Autonomy from any political or administrative steering, or influence by the auditees is considered one of the prerequisites for credible and mean-

ingful auditing. In fact, according to the RRV, it is a necessary condition for an activity to be defined as auditing: 'The annual financial audits and the effectivity audits are carried out independently according to customary audit practice. *This is in practice a prerequisite for a study to be called audit*' (RRV 1995a, p. 2, our italics). The RRV and the VTV, whose autonomy might otherwise be doubted because of their administrative placement within the jurisdictions of their respective Ministries of Finance, argue firmly there is no interference by these ministries (nor any political stewardship) in the substance of their work. This point is explicit in all their self-explanatory publications.

Likewise for the NAO, 'independence' is advanced as a guarantee for high quality work: 'By being totally independent of Government, we are able to provide, on behalf of Parliament, an important link in the chain of accountability and stewardship of public funds' (NAO 1990, p. 3). This 'total independence from the government' can, however, be interpreted as a different kind of autonomy from that fostered by the RRV and the VTV. The NAO introduces itself as working on behalf of the Parliament, and 'total independence' of government is needed as the government's activities and achievements are actually the target of their work. The VTV and the RRV seem to present their independence more as an absolute quality, with no reference to their mission being carried out for any other institution. They place themselves outside the whole apparatus of state institutions, on an Archimedean point from which they deliver objective information for anybody to use. Their placement within the executive is presented as an administrative practicality which has no substantial influence on their mission. In a somewhat similar way the ECA says it functions 'independently and autonomously', but without being particularly precise about who *might* control them or limit their independence (ECA 1995, p. 12). The CDC's message on its independence is, however, more precise: it states that its main task is to assist Parliament and government but that it is independent from both (CDC 1994, p. 2).

A second *apparent* similarity is that all the SAIs seem to want to claim to be expert and accurate in their work. However, on closer inspection, this similarity begins to disappear because each SAI makes this claim on a different basis. For example, the ECA gives an extended account of the rigour of its investigatory procedures and ends up saying their auditors are 'as objective as possible' (ECA 1995, pp. 19–20). The NAO, by contrast, stresses the amount of outside expert advice it seeks to ensure high quality audits (NAO 1995, pp. 17 and 26). One possible source of outside advice is, of course, private sector accountancy, and the NAO, RRV and VTV all make mention of the similarity of their work to commercial audit, or to the way they seek advice from commercial audit bodies. That the NAO, RRV and VTV make these comparisons is clearly intended to reflect credit upon themselves. The CDC says little of its procedures and nothing about seeking outside advice. It emphasizes the high quality and sophisticated training

of its magistrates (CDC 1991b). The RRV, uniquely, stresses the usefulness of a good social science education for its auditors, and refers to the importance of good communication skills. There are also references to improvements in internal quality procedures and to the occasional use of outside experts (RRV 1995b, p. 7). The VTV is less forthcoming about what constitutes excellence. In its annual report (SAO 1995a) it mentions, briefly and vaguely, that measures to develop quality assurance in its work are under way, but neither in that document nor in the general information booklets (SAO 1995b and SAO no year) does it actually emphasize any qualities it wants to be attached to it – rather, it sticks to factual descriptions of what it does.

All SAIs have to some extent dual roles – as sources of discipline for auditees and as catalysts for improvements. Yet the texts we have examined vary considerably in the balance they strike between these two roles. The RRV and the NAO describe themselves first as improvers and give only a lesser prominence to the disciplinary dimension. For example: 'Reports by the Comptroller and Auditor General aim to be forward-looking, positive and constructive, being more concerned with lessons for the future than past mistakes' (NAO 1990, p. 10). The RRV sings the same song but at a higher pitch:

From a holistic point of view information and new viewpoints will be intermediated which can serve as inspiration to change and re-prioritizations of state activities. Effectivity auditing gives incentives to effectiveness and thus fills for the public sector the same role as competition for market driven activities (RRV 1995d, p. 3).

The ECA certainly identifies improvement as an important role, but at the same time, gives the disciplinary dimension more prominence, describing its basic role as an assistant to the European Parliament and the Council in exercising their powers of control. Also the ECA's self-characterization as the EU's 'financial conscience' seems to imply a dominant disciplinary purpose (ECA 1995, p. 13).

The language of improvement is scarcest in the documents generated by the CDC. On the contrary, these give a detailed description of what powers and procedures the CDC has at its disposal in cases of irregularity or mismanagement. Referring to its judicial powers to clear the *comptables publics*, the CDC reaffirms the indispensability of this practice as it 'gives the Cour a hold over the comptables' and assures that they will 'bear in mind that they will have to answer for any error or irregularity' (Cour des Comptes 1994, p. 4).

These differences lead us to the larger question of the attitudes that the different SAIs have towards the statutory authority and power position they enjoy, and how they represent this in their public image. Some seem proud to announce their possession of unquestionable authority over other public bodies, while others introduce this aspect of their position *sotto voce*

or fail to mention it at all. The two extremes in the SAIs' relation to power seem to be the CDC and the RRV. The CDC does not hide its power, on the contrary it points out that it is an authority with considerable legal 'clout'. This is a different approach to that of (particularly) the RRV. The latter describes itself as a 'helper' and support to other government units in their efforts to improve and develop their activities. This idea of 'helping' is also to the fore in the NAO's booklet (NAO 1990, p. 5) in a way that would be difficult to imagine figuring in the vocabulary of the CDC. Finally, in the case of the VTV, power seems to evaporate: the wording of their documents avoids any colourful or metaphorical characterizations of the auditors' role. Instead the reader is treated to a low profile account of the VTV as a provider of 'reliable and sufficient information' which may 'produce economic benefits' (SAO 1995a, p. 6).

## DISCUSSION

It is abundantly clear that the SAIs examined in this study adopt different strategies towards 'explaining themselves' in their formal published materials. In this final section we interpret these observed differences.

Two factors appear obvious. First, these SAIs differ in the *extent* to which they feel it necessary to justify their existences (though all exhibit an awareness of the need to do so). Second, the *terms* in which such justifications are offered fall either into the 'managerialist' camp (for example, the NAO), or into the 'constitutionalist' camp (for example, the Cour des Comptes). In the former much is made of the impacts of the SAI's activities in terms of savings across the audit field and/or of productivity gains within the SAI itself (for example, the VTV's emphasis on the falling cost of an average audit day and on the rising numbers of audits done within a given time). Over time the sophistication of these managerialist measures may be increasing (Wilkins 1995). In the legal/constitutional camp little if any of these kinds of information are on offer. Thus, in the case of the CDC, one is simply informed of how many decisions have been promulgated, with no indication of times, costs or impacts. The CDC and ECA annual reports and the CDC's self-explanatory materials are not written in the managerialist language which is so strongly present in the publications from the NAO, RRV or VTV. However, the ECA is not such a 'pure' example in this respect as the CDC, because managerialist concerns are considerably more prominent in its explanatory booklet (European Union 1995).

So, the language of managerialism – the discourse of justification by measured productivity and/or effectiveness – has penetrated some SAIs less than others. This finding is suggestive, and leads to the question of why this might be so. The degree to which each SAI has adopted a managerialist discourse mirrors the extent to which managerialism has penetrated the state apparatus generally in the country concerned. A number of commentators have noted that the pervasiveness of NPM-thinking varies a good

deal from country to country, and France is usually cited as a state that has adopted managerialism to only a middling or low extent, while the UK is seen as a true believer. Sweden and Finland can be classified as fairly strong practitioners of NPM, although without the intensity of pro-private sector doctrine manifest under the Thatcher and Major administrations in the UK (Jones 1993; Hood 1995; Naschold 1995; Trosa 1995; Pollitt 1997). The SAIs echo a larger tendency within the state apparatus of their country.

However, this rather broad 'mirroring' explanation can be refined by introducing two further distinctions. First, the position of the SAI within the state apparatus, affects its susceptibility to management fashions. However, second, managerialism has several facets and even in broadly 'resistant' SAIs such as the ECA and CDC, *some* of these facets are becoming visible.

Most SAIs occupy a traditional location at the core of their state apparatuses. They lie at the heart of the old, rule-following bureaucratic order. In France the *hauteur* of the CDC is legendary. In Finland the VTV proudly points out that it is the only office specifically mentioned in the constitution (State Audit Office 1995b). Until recently the main activity for many SAIs – financial audit – was a kind of quintessential, meta-bureaucratic ritual – verifying that the correct rules had been applied to the handling of the state's finances. Thus, one might expect SAIs, as prime beneficiaries of the 'old order', to be among the most resistant of institutions towards the 'new order' of the NPM. Managerialism would be less likely to penetrate SAIs than more peripheral parts of the state apparatus such as public utilities or more recently formed departments or agencies.

Unsurprisingly, cultural influences seem to march hand-in-hand with these constitutional factors. Some of the cultural features that go together – and are generally supported by managerialist thinking – are transparency, openness, a low degree of formalism and a certain type of egalitarianism (in the form of a lack of tradition, status or seniority based distinctions between 'ranks' or distances between staff). Thus, the more hierarchical, formal and status-oriented administrative cultures of the continental countries may well be reflected in the disciplinary cultures of their SAIs. Similarly, the more performance-oriented cultures of the 'northern' SAIs could be linked to the more open, egalitarian and less formal cultures of these countries.

Despite substantial differences of constitution and culture, the national and international forces propelling managerialism have been strong, and SAIs have not been able simply to ignore them. The public sectors they are required to audit have been changing rapidly beneath them. The terms of discourse in which politicians and civil servants have analysed and debated institutional and programmatic issues have shifted. 'Performance', 'effectiveness' and 'productivity' have become dominant terms. Our second distinction focuses on the different facets of this new discourse.

One facet is simply the adoption of performance audit itself. By using

performance audit, an SAI begins to apply managerialist criteria to auditees. All our SAIs do at least this. A second facet concerns the degree to which performance audit is separated *organizationally* within the particular SAI. Thus, for example, the ECA and the CDC certainly *practise* performance audit but they have not restructured internally to create separate units for its conduct. Performance audit is 'mixed in' with traditional audit and internal subdivisions within these two SAIs are based on the institutions and programmes of the state rather than on the type of audit to be delivered. Contrast this with, for example, the RRV, the VTV and the NAO, in each of which performance audit is separated out into distinct internal units. A third facet is the extent to which an SAI becomes an advocate or an active supporter of managerialist reforms. The RRV is particularly enthusiastic and even provides consultancy advice to state bodies undertaking results-oriented reforms. The VTV does not go that far, but is clearly supportive of the broad thrust towards results-oriented management in Finland. The NAO documents tend to avoid any direct or general approbation of managerialism, but nevertheless support the drive for efficiency and effectiveness. Similarly, the ECA makes approving mention of management improvement in EU institutions, but not in an active and focused way. The CDC is even more reserved; its documentation offers no broad endorsement of managerialist reforms.

It could be said that many (not all) of the differences apparent from the documents we have examined could be captured by the question: 'to what extent does each SAI apply to itself the same criteria for success it applies to auditees?' All now apply – in at least part of their work – managerialist criteria to auditees. But when it comes to applying these same general criteria of productivity and effectiveness to themselves, there is considerable variation, much of which may be captured in the rough distinction we have made between the 'managerialist' and 'constitutionalist' camps. Ultimately the application of managerialist criteria would logically lead to a position in which an SAI had no *distinctive raison d'être*. Its continuing existence would depend on its measured performance; on whether the savings and other improvements prompted among auditees exceeded its costs. None of the SAIs in our sample have reached this point. All still claim a distinctive role – all ask, in effect, to be judged by other criteria also. But the managerialists have started down this road, while the constitutionalists appear much less convinced that it is even an attractive direction in which to travel.

In conclusion we suggest there are dangers in *both* the fervent embrace of NPM principles by SAIs *and* also in the constitutionalist position. For managerialists there is a danger of losing democratic accountability once an SAI begins to make usefulness to audited bodies a major criterion of its work and this begins to rival its original mission of fearlessly reporting waste, inefficiency and ineffectiveness to the public domain. If an SAI over-concentrates on the quasi-consultancy role of helping audited bodies to improve their performances then it would be easy for cosy, less-than inde-

pendent relationships to develop. Such relationships might appear quite seductive to auditors, not least, because they hold out the hope of being on good terms with the audited bodies instead of being regarded with suspicion and apprehension. However, such developments could easily conflict with the maintenance of full and transparent accountability to elected representatives and the wider public. If auditors develop warm relations with the auditees the taxpayer may begin to feel the cold.

The pure constitutionalist position has its own dangers. Ultimately it is inconsistent for an SAI to promote democratic accountability but give little useful information about the extent, content and quality of its own activities. Platonic guardians seem out of place on the verge of the 21st century. An SAI may well argue that the criteria that should be applied to its own performance should be different from those applied to a spending department, executive agency or other type of audited body. However, that is not at all the same as offering no testable criteria at all. The constitutionalist argument that SAIs are different, even *sui generis*, is an attractive one, but it behoves the proposers of such a line to go on to specify in operational terms *how* they are different, and how, against whatever criteria they may wish to specify, a well-performing SAI can be distinguished from a poorly performing one.

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