Blissful Ignorance? Risk management and knowledge of food supply chains
Jeremy Brice considers whether management of risk through strategic ignorance is past its sell-by-date
Regulating for and with the masses? A new era of regulation?
Hanan Haber and Eva Heims discuss the growing significance of regulation for social and distributive purposes
Are regulators the new Men in Black?
Not when it comes to independence...
Filippo Cavassini, Faisal Nuru and Bill Below call for a fresh look at regulatory independence
Regulating in the dark: oversight over intelligence services
Martin Lodge considers the relationship between transparency and security
The artefacts of risk management
Michael Power highlights the effortful nature of risk management practice
Regulating Security

Martin Lodge and Andrea Mennicken consider the growing currency of security in risk and regulation debates

Security is not a term that has enjoyed widespread currency, there is yet to be a general recognition that the security of an individual, and therefore the regulation of security, might need to be applied against the continued functioning of critical infrastructures. This is not to say that a degree of cyber-security has not vanished, as can be seen by the particular security arrangements regarding the data protection applicable to EU-funded proposals. But security-related questions should also be more generally at the centre of debates about risk and regulation. Security assures the existence of a threat. This threat is directed at a certain state of the world that is seen as desirable. The identification of threats (or the ‘other’) is a highly political process as is the definition of desirable states of the world deemed worth protecting. This raises questions as to what or who is being threatened, such as individuals or collectives. It also questions about who is causing a threat, whether these are state or non-state, national or international organizations or individuals. Regulating security links to a world in which emergencypowers exist and where private organizations are tied closely to state powers in order to allow for the continued functioning of critical infrastructures. It links to questions as to how much security an individual should be granted in view of potentially opposing interests by the security state. This hidden world that seeks to provide security requires more interrogation. The tendency to extend the regulation of security go to the heart of constituting the concept of security. They are therefore of fundamental relevance to the study and practice of risk and regulation.

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Security clearances and the regulation of national and domestic security personnel

Robert Rizzi and Charles E. Borden advocate changes to existing approaches

In recent years, Western security establishments have been subject to a number of significant security breakdowns, with individuals obtaining and widely disseminating massive amounts of classified information. These breakdowns have highlighted some of the limits of the current security process, both in terms of how information is classified, and the process by which governments determine who may have access to classified information.

In the US, and elsewhere, the core component of the process by which a person is provided access to certain categories of classified information is the ‘security clearance’. Initially developed during the second world war, and greatly expanded in the early years of the Cold War, the security clearance process rests on a ‘certification model’ – at prescribed points in time, an assessment is made of an individual’s suitability to receive classified information, and the individual is either ‘certified’ and receives clearance or is denied. The process focuses on the government’s national security interest with little weight given to the individual’s personal interest – the ability of an applicant to appeal a denial of a security clearance is fairly limited. This approach, however, has begun to show strains, as the changing nature of both government and information has created new challenges for which the current security clearance system is not optimally designed.

In particular, the expansion in the size of government and the increasing use of private contractors in national security-related activities, coupled with rapid changes in information and communications technology, has resulted in a process that is both too broad and insufficiently reliable. The number of government and government-related positions that require security clearances has exploded over the past couple of decades, despite questions about whether and to what extent many of these positions are likely to encounter classified information. This explosion in the number of security clearances that need to be processed has in turn stretched the resources of those agencies responsible for administering the security clearance regime. At the same time, the computer and communications revolution has expanded the volume of classified information exponentially during the same period, making the consequences of a security breach potentially far more wide-reaching than they were in the past. Put simply, under the current security clearance process, significant resources have to be expended on certifying security clearances for individuals and positions that pose little security risk, and at the same time the risks associated with a potential breach have increased substantially.

Moreover, security clearances have taken on a regulatory role that extends well beyond their original purpose of protecting sensitive information. In effect, the security clearance assessment process has become a form of government franchise or licence. This has made a security clearance, especially at the higher levels such as Top Secret, a ‘bankable’ qualification, and a requirement for working in a large number of fields that may be only tangentially related to national security.

A changing landscape

Although the security clearance process has broadly remained unchanged since the 1950s, the landscape in which it operates has changed significantly. The growth in the size of the US government, coupled with an increased tendency to designate positions as requiring a security clearance even where there is little likelihood that they will encounter classified information, has led to a massive increase in the number of security clearance reviews that are performed every year. Indeed, it is estimated that in 2014, 5.1 million individuals, primarily Americans, had security clearances granted by the US government (Fung 2014), including roughly 1.5 million at the Top Secret level, and that the cost of ‘vetting’ those individuals was approximately $6 billion (ibid).

Moreover, attachment of a security clearance to a particular individual increasingly has become a form of government franchise or licence. This licence determines whether or not the individual can serve in a wide range of government positions, as well as in private sector positions that have quasi-governmental functions, regardless of whether the position will require contact with classified information (Rizzi et al., 2015: 24-27). This trend has made a security clearance, especially at the higher levels such as Top Secret, a ‘bankable’ qualification, and a requirement for working in a large number of fields that may be only tangentially related to national security.

Challenges

The current system has created a one-way ratchet in terms of requiring clearances, and of the corresponding scope of clearance investigations. The result has been delays in performing background checks and the use of third-party contractors to conduct investigations, with a predictable impact on quality. Comprehensive monitoring of individuals with access to classified information is limited, and in some spectacular cases, has proved to be inadequate.

Because a security clearance is required for a range of positions, a denial or revocation of a clearance constitutes a de facto regulatory bar to public service. The American system has developed an elaborate process of implementing denials and revocations of security clearances, using terminol-
As with any certification system, the current security clearance system is its reliance upon a certification model. Under the original 1953 regulatory scheme, as slightly modernized in the 1995 Executive Order, the scheme depends almost entirely upon standardized procedures to determine whether an individual can be ‘cleared’ for access to classified information and, if answered in the affirmative, the clearance certifies the individual can have such access going forward, even though neither the government nor the individual knows precisely what information will be involved in the future. Moreover, certification systems generally operate on a ‘snapshot’ in time, often failing to take into account changes in the certified person or his or her circumstances over time.

As with any certification system, the current approach purports to provide assurance, and to create a presumption of continued validity, once the certificate is issued. Many of the speculative examples of failures of the system involve individuals who may have at one point been deemed sufficiently trustworthy, but became dangerously unreliable, as the result of a variety of changing factors, such as financial distress.

Risk-based reforms?
One possible approach to reforming the current security clearance system would be to rely upon a risk-based personnel evaluation system, which would emphasize ongoing compliance and monitoring, rather than a single certification. A risk-based approach would provide a more comprehensive set of categories of individuals with contact with classified information to replace the three basic categories now used. Such an approach would concentrate resources on those positions as to which individuals would be most likely to handle, or be exposed to, classified information, particularly classified national security risk, and would focus on comprehensively mitigating that risk. In practice, this approach would mean reversing the one-way ratchet, with fewer positions requiring any form of clearance, and with those positions requiring clearance bearing risk-weighted at the outset. In implementing this approach, it should be possible to measure actual and probable contact between the individual’s position and classified information, and to apply more rigorous standards to those with greater access. For example, an individual acting as a systems administrator or maintenance worker with broad access to classified information through highly sensitive IT systems would be subject to the most rigorous standards, regardless of title or seniority. The risk assessment thus would be based on current and probable future activities of the individual, rather than seniority of position.

Furthermore, a reformed compliance and monitoring model could modify or replace a half-century old certification system. Especially for positions that have access to particularly sensitive information, frequent and random reporting and responses to selected inquiries (for example, questions concerning unusual changes in financial holdings or transactions) could provide deterrence from inappropriate conduct with respect to such information. Similar models have been developed in the past to address analogous conduct risks, for example, testing regimes for restricted substances and drugs (for recipients of government licenses and airline pilots), and for monitoring potential financial conflicts of interest. These regimes also tend to create and reinforce norms of conduct that reinforce the regulatory regime, because of the periodic reminders that the individual is subject to a special set of rules.

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Building transboundary crisis management capacities in Europe

Lavinia Cadar and Maureen Donnelly

The world of crisis is changing. The refugee crisis, the Eurozone crisis, Brexit or terrorism – the modern world cannot be tampered with unilaterally. These transboundary crises cut through geographic, economic, political, cultural, policy or legal domains. They require transboundary crisis management capacities.

The European Union (EU) must adapt to this new world of crisis if it is to demonstrate continuing relevance in the face of ever-growing threats. The EU has in place modest capacities to help member states manage crises within its boundaries and beyond. But the EU can do more, we argue, to assist member states. In thinking about potential trajectories for institutional design, it is helpful to think of crisis management as a set of tasks that have to be fulfilled in each and every crisis. These tasks are particularly hard to implement in a transboundary context. Here is what the EU may try to accomplish.

Detecting an emerging crisis may seem straightforward. But in many cases, critical bits of information must be pieced together and deemed relevant by a considerable number of people before a crisis is recognized. The EU has in place a large number of early warning networks that gather information on the origin, spread and severity of many threats. Yet, early signs of a transboundary crisis must make their way through the complicated and time-consuming process of national and EU agenda-setting, where they become subject to consensus-forming among member states. The trajectory of early warning signals must be streamlined.

Once an emerging crisis has been detected, it is crucial to understand what is going on. Identifying sources, collecting information, analysing ambiguous and often conflicting data. Sense-making is not easy in the bordered world of national states and agencies. When the number of actors involved stretches across geographical borders, when the crisis management authorities are not hierarchically related, when it is uncertain who knows what and where information must come from and go to, sense-making is a daunting task.

During the 2010 Icelandic volcanic ash crisis, none of the EU member states detected the escape of air traffic as uncertainty loomed over the composition, size and direction of the ash cloud, as well as the ash tolerance limits of jet engines. In the early phases of the global financial crisis, the division of competences between the EU and member states exposed many key loopholes and unacknowledged gaps in the communication network. In such situations, those relating to security, health and wider economic impacts, some losses were inextensible. The uncertainty over causes and what must be done to control them can convey a shared responsibility. But many barriers remain, especially when it comes to sensemaking intelligence.

The biggest problem in a transboundary crisis is the absence of clearly demarcated decision making powers. While the US has at least addressed this problem through its National Response Framework (NRF), the EU is still stuck with the decision making structures that were designed to deal with complex but not urgent problems.

Think of the refugee crisis. The large numbers of people from Syria and elsewhere arriving at Europe’s borders highlighted serious limitations of the EU’s joint decision making process. Initially, humanitarian concerns dominated responses. However, other issues, such as those relating to security, health and wider economic impacts, soon emerged. These concerns had to be weighed against a background of conflicting and incomparable information on the number, identity and demographics of the refugees, as well as political pressures, budget restrictions, education and social services limitations, and divided sentiments among host communities. The lack of an appropriate decision making process to quickly bring together the many jurisdictions involved resulted in paralysis.

The EU has various crisis centres and is working to put procedures in place that will help to process information, share it across boundaries and under-standing information from other sectors and/or countries, thus facilitating a shared response. But many barriers still remain, especially when it comes to sense-making intelligence.

The TransCrisis project (full name: Enhancing the European Transboundary Crisis Management Capacities: Strategies for Multi-Level Leadership) is a three-year project funded by the European Union under the Horizon2020 programme. COAR is the coordination partner in this network of eight organizations. Other partners involve: Crisisplan (Arjen Boin), the University of Utrecht (Femke van Esch), European University (Nick Sitter), University of the Canary Islands (Fluvio Attina), University of Stock- holm (Mark Rhinard) and ThinkTank Europa (Maja Rasmussen). More information can be found at the project website: www.transcrisis.eu.

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Blissful Ignorance? Risk management and knowledge of food supply chains

Jeremy Brice considers whether management of risk through strategic ignorance is past its sell-by-date

In November 2013 the Food Standards Agency announced a new £10 million research programme, funded by the UK agri-food sector. Operating under the auspices of the UK Global Food Security Programme, this initiative called Understanding the Challenges of the Food System, would explore public perceptions of food supply chains and analyse the resilience, integrity and security of those supply chains. These had, the programme’s funders explained, become issues of major public concern and urgent policy relevance following the discovery earlier that year that processed meat products ranging from burgers to lasagne and ready meals had been adulterated with horsemeat.

Academics and food regulators were not alone in experiencing pressure to deliver improved knowledge of food supply chains in the aftermath of the events that became known colloquially as ‘Horsegate’. As Peter Jackson has observed, Horsegate tended to be characterized within prevailing narratives as a product of systemic deficiencies in UK food and agricultural policy and regulation of international food supply chains, rather than as the result of malpractice within individual food businesses, or any identified shortcomings in national regulatory regimes. For instance, the Elliott Review (2013: 18) into the Integrity and vulnerability to fraud stemmed from strategic ignorance is past its sell-by-date

By this account, Horsegate was a ‘product of opaque and convoluted global supply chains which extended far beyond the regulatory reach of any single enterprise or nation state and included numerous layers of murky and unaccountable intermediaries. As such, it appeared that more detailed knowledge of long and complex food supply chains would be required if the risk of food fraud was to be controlled and future adulteration scandals averted.

As a researcher attached to a project funded under the Understanding the Challenges of the Food System programme, I have been an attentive observer of post-Horsegate efforts to achieve an improved knowledge of the workings of food supply chains and to understand their attendant risks. The project on which I worked – ‘Making provisions: anticipating food emergencies and coherent food supply chains’ – examined how actors involved in the production, processing, retail and governance of food go about anticipating potential emergencies and crises before they occur, and how they develop plans to prevent, pre-empt or manage such events. Over the past two years, my colleagues and I have closely followed the rapid proliferation of technologies and services (including specialist audit, brand protection services and supply chain mapping techniques) designed to help food businesses to identify and control potential risks within their supply chains. We have found ample evidence of interest in these services within food businesses. Supply chain managers and technical staff spoke eagerly of mapping supply chains spanning continents and embracing hundreds of companies, and of utilizing supply chain data to develop new risk analysis techniques. Yet in practice many food businesses’ knowledge of and influence over their supply chains extended only as far as the companies from which they bought their products or ingredients. While these immediate suppliers were typically subject to precautions to prevent such an incident from occurring. As a result, a food business’s liability for cases of contamination, fraud or food-borne disease often hinges on the question of whether it could reasonably have foreseen that the actions of companies within its supply chains might result in a breach of food law. A food business which had access to, or was in a position to obtain, information indicating that such a breach was likely to occur within its supply chain would find itself exposed to costly and reputationally damaging litigation. Meanwhile, one which could not reasonably have been expected to obtain such information would not be held legally to be responsible.

This means that investing in identifying the companies which make up their extended supply chains, or in gathering information about the emerging risks and threats to which those companies might be exposed, may not always be in food businesses’ best interests. While possession of this information might indeed help a business to prevent breaches of food law and thus avert potential crises, it might also be taken as evidence that its staff could have foreseen offences committed by companies within their supply chains. In short, food business practitioners are presently caught between a hope that improved knowledge of their supply chains might help them to better manage the risk of food scares and scandals, and an awareness that possession of such knowledge could place them at risk of prosecution for offences that they did not commit.

Caught in this double bind, many British food businesses appear to be managing their own exposure to supply chain risk through what Linsey McGoey might term a policy of ‘strategic ignorance’. For McGoey (2012: 550), strategic ignorance is a name for practices which ensure that ‘unsettling knowledge is thwarted from emerging in the first place, making it difficult to hold individuals legally liable for knowledge they can claim to have never possessed’. In this case, food businesses’ liability for breaches of food law through ensuring that their knowledge of their extended supply chain remains sufficiently limited that they may plausibly claim that they could not reasonably have foreseen any incidents which might occur within it. Many such businesses appeal to have concluded that this can best be achieved by working hard to demonstrate that their immediate suppliers are responsible companies which can reasonably be trusted to ensure that compliance is maintained among the businesses which make up their extended supply chain.

This cultivation of a strategic ignorance of the threats and vulnerabilities within their extended supply chains arguably plays as crucial a role in the risk management strategies of many food businesses as does the production of knowledge about their supply chains. Yet many participants in the Making Provisions project also felt that this ability to maintain strategic ignorance of their supply chains might itself be increasingly a risk. In the aftermath of the Horsgate report and the key food industry assurance schemes such as the British Retail Consortium’s Global Standard for Food Safety were overhauled, and now place greater emphasis on the traceability of food stuffs and on the assessment and management of food fraud risk at all levels of the supply chain. Meanwhile the Modern Slavery Act, passed in 2015, obliges food businesses with a turnover of more than £36 million to publish an annual statement detailing what steps they have taken to ensure that all parts of their supply chain are free of human trafficking, slavery, sordidness and forced labour.

Such developments suggest that both legislative and private sector regulatory arrangements may be moving gradually towards a position that ignorance of lapses with one’s extended supply chain is no defence – a trend which raises questions for academics and risk management practitioners alike. Even if risk management approaches which mobilize a strategic ignorance of supply chains remain legal, are they still acceptable either to food regulators or to the general public? What might be the impact upon the food industry of any potential move towards a regulatory model premised upon a complete knowledge, and tighter control over, food supply chains which are global in scale and enormous in scope? And if the management of risk through strategic ignorance is to become a thing of the past, then just how is risk to be regulated and governed within the food supply chains of the future? Perhaps those currently grappling with such questions might be forgiven for concluding that ignorance was indeed bliss.

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Regulating for and with the masses: a new era of regulation?

Hanan Haber and Eva Heims discuss the growing significance of regulation for social and distributive purposes

In 2015, the Well-being of Future Generations (Wales) Act 2015 was enacted, aimed at ‘improving the social, economic, environmental and cultural well-being of Wales’. The Act requires public bodies to ‘think long term’, involve the public and those affected by policy and ambitiously ‘take action to try and stop problems getting worse’ or even stop them happening in the first place. A cheerful animated video commissioned by the government follows the future life trajectory of a newborn, Megan (Welsh Government, 2015). But what explains this legislation in the first place? Although adorable, animated babies do not lobby for legislation, nor do they organize in interest groups, vote or make political contributions. While it may be fairly intuitive to explain policy which overlooks individuals, causes or groups with little political clout, the growth of regulation aiming at protecting and involving those with little political voice (such as future generations or the economically vulnerable) comes as a surprise to regulatory scholarship and those who take a cynical view of political and regulatory processes.

We argue this Act is part of two wider trends, worth exploring together. The first is the growth of ‘regulatory participation’, involving citizens directly in regulatory decision making. This means regulation for social and redistributive purposes is growing in scope and significance. This is specifically so referring to vulnerable citizens, increasingly shielded from the market in different national settings and across sectors, from the regulation of the disconnection due to non-payment in the utilities, to ‘mortgage rescue’ schemes in housing credit, to regulating fees in pension markets, with wide variation between sectors and national settings (Haber, 2011, 2015, 2016). In the second trend, we can also increasingly observe the emergence of ‘participatory regulation’, in which formerly expert-dominated regulatory decision making now entails citizen involvement. Examples range from policing to environmental regulation, demonstrating citizens’ increasing involvement in governance processes at the local level by deliberating, rather than voting, about how government policy or services affect them, in different ways. Even in two jurisdictions of the UK, England and Wales, and Scotland, we have seen different types of participatory regulation emerge in the same sector at the same time, namely in price-setting in water regulation (Heims and Lodge, 2016). These developments may signal a tentative move away from a regulatory world that is predominantly shaped by the concern to reassure investors.

Interestingly, increased participation is often accompanied by a stronger representation of vulnerable or ‘voiceless’ citizens in regulatory processes. For example, despite the mentioned different nature of customer engagement in water regulation in Scotland as opposed to England and Wales, customer representatives in both jurisdictions were able to push water companies to be more mindful of their most vulnerable customers (especially large families on low incomes) during the last price review. This suggests that the growth of ‘regulatory participation’ and ‘participatory regulation’ may provide the appearance of more legitimacy, it may also increase controversy regarding what is perceived as legitimate regulatory decisions.

The shifting of political, social and environmental decision making to the regulatory arena, while also changing how regulatory decision making operates, signifies interesting times for citizens and scholars of regulation alike. As regulatory objectives as well as the nature of regulatory processes are in flux, it remains unclear how new tensions arising from this ongoing shift are to be reconciled and what consequences this transformation will have. In order to gain a better understanding of these issues, scholars and practitioners of regulation thus need to seek to understand what is driving these processes, how tensions between different goals are to be reconciled, and who speaks for those with and without a voice.

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Are regulators the new *Men in Black*? Not when it comes to independence ...

Filippo Cavassini, Faisal Naru and Bill Below call for a fresh look at regulatory independence

The *Men in Black* are a special unit charged with regulating Alien activity on planet Earth (at least it is in the film with Will Smith and Tommy Lee Jones). Their job is to operate incognito, working behind the scenes to avoid an intergalactic apocalypse. When uncovered, special technology allows them to eradicate all knowledge of themselves and their function.

To most of us, regulators are a lot like the *Men in Black*, ensuring that trains will run on time, that there is clean water in the tap, that lights switch on, that the broadband is working and that there is cash in the ATM machines. They largely go unnoticed, that is, until something goes wrong, stops working or crashes.

Unlike the *Men in Black*, regulatory agencies do not operate incognito – or they shouldn’t. They must be part of a well functioning and transparent governance eco-system that provides these important public services and are held accountable for the performance of their different actors. Being part of this eco-system, however, carries a number of risks.

Different stakeholders – whether regulated industry, government, politicians, consumers or other interest groups – have powerful incentives to influence or capture regulatory policies. The danger of capture is all the more present because of the proximity of regulator and the regulated.

We need regulators to be independent, just as we need our judges and referees to be independent. However, independence cannot come at the price of accountability or engagement, and regulators need to keep their fingers on the pulse of the market through interaction with industry and consumers. In addition, autonomy should still be compatible with maintaining helpful feedback loops between the regulator and its governmental executive overseers. In a nutshell, regulators must be engaged but not enmeshed, insulated but not insular.

Given the challenging context within which regulators operate, the question is how to limit undue influences in practice and create a strong culture of independence. In the quest for an answer, the OECD first set out to understand how regulatory agencies around the world are structured to be protected from undue influence. The OECD has developed a unique dataset of the formal arrangements for independence of regulators across 33 OECD countries, complemented by detailed case studies showing what holds regulators accountable for their performance.

**The report finds that undue pressure can be exercised at different points in the life of a regulatory agency. For example:**

- 88% of the regulators who receive their budgets from the executive receive annual rather than multi-annual budget allocations, which can increase the risk of undue influence and affect their financial independence.

- Most of the regulators have their head appointed by the government’s executive branch. In 15% of cases, the appointment is made by parliament. Only eight regulators use a search committee for hiring a new chair.

- Over half the regulators place no restrictions on pre- or post-employment of professional staff, opening the risk of ‘revolving doors’ and conflicts of interest with industry and the political cycle.

- Only a quarter of the regulators are given a government statement of expectations on their conduct. Such formal public statements can be useful to clarify roles, goals and activities in a transparent and accountable way.
A key conclusion of this work is that while institutional design is one part of risk and regulation, winter 2016 21

Figure 2. ‘Pinch point analysis’ methodology demonstrating the level of independence for users. Independence is not a static means of ensuring effective and efficient public service delivery by the different market players. Developing a culture of independence is just another way of nurturing better performance. The task for government institutions and regulators is how to develop this culture of independence that delivers for users. Independence is not a static state achieved once and for all by a statute. While institutional design is one part of risk and regulation, winter 2016 21

Figure 2. ‘Pinch point analysis’ methodology demonstrating the level of independence for users. Independence is not a static means of ensuring effective and efficient public service delivery by the different market players. Developing a culture of independence is just another way of nurturing better performance. The task for government institutions and regulators is how to develop this culture of independence that delivers for users. Independence is not a static state achieved once and for all by a statute. While institutional design is one part of risk and regulation, winter 2016 21

Building on this methodology, the OECD is currently developing guiding principles for how regulatory agencies and, more generally, arm’s-length bodies, can be protected from undue influence. For instance, multi-year budgets can provide predictability and shield the regulator from short-term political concerns or reactions to decisions taken by the regulator. Making the nomination process more transparent can help recruit chairs and agency heads who have the necessary technical skills and credibility to enhance the performance of the regulator. These institutional arrangements would not only make the agency or body more effective but also signal the willingness to protect the regulator from undue influence. This signal is the condition for nurturing a culture of independence that enables the regulator’s leadership and staff to behave and act independently. Being an independent regulator cannot mean adopting the cloak of invisibility and working behind the scenes like the Men in Black. Regulators must fully engage with all stakeholders. Maintaining independence in the midst of significant pressure from all sides requires governance structures aimed at nurturing a culture of independence. It may not keep the galaxy safe, but it will ensure that regulatory agencies better serve the public good.

For more information see OECD (2016b, 2016c) on ‘Independent regulators and protection against undue influence’ and ‘Governance of Regulators’ Practices’.

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One of the most well-known principles in the canon of Jeremy Bentham’s writings on government is the general principle of transparency. All activities, according to Bentham, were to be made open so as to allow for external scrutiny. One sector, however, was exempted from this universal principle: the security or intelligence services. The reason for this exemption appears straightforward: security services, by their very nature, have to operate outside the glare of public attention in order to perform their work. At the same time, the secrecy of operations also calls for some degree of regulation and oversight; after all, discretion can be abused – the state’s covert activities to make individuals live transparently require disciplining constraint.

The regulation of the security state is therefore a very special, and particularly tricky case for the study of the regulation of government activities. In an age where the threat of terrorism has, once again, become a feature of daily life, the regulation of intelligence services is also an area that has become increasingly important as different intelligence services have launched recruitment drives, as concerns about access to encrypted communications have escalated, and the world of digital technologies is said to fundamentally alter the nature of intelligence work, and as the context of conditions for national and international co-operation have changed.

What then can be said about recent trends in regulation and oversight? This is an interrogative task of some importance as individual agencies anxiously protect their turf against the security services’ willingness to supply intelligence services for such purposes.

Such rights have been enshrined in Article 8 of the European Convention of Human Rights – the right to privacy can only be limited by public authority, also on security grounds, in accordance with the law and as required for a democratic society. Recent incidents include the concern with the extensive surveillance by national intelligence services on national and non-national private citizens, politicians and businesses. There have been concerns about the lopsided nature of intelligence services in observing extremist activities such as showing a remarkable negligence in monitoring right-wing extremist sympathisers. Furthermore, the g/s Commission Report, and other incidents, have highlighted the difficulties of ensuring national, let alone international, information exchange. In other cases, there has been rather extensive collaboration as evidenced in the recent inquiries into the collaboration between the German BND and the US-NSA. This also links to examples of so-called intelligence failures, where information was detected, but not acted upon. Attempts in the US have remained fraught as individual agencies anxiously protect their turf vis-à-vis the Department of Homeland Security and other co-operation initiatives. Pooling of expertise is emerging across the European Union (as part of the ‘Counter Terrorism Group’) after 2001, but has remained problematic given the preferences for bilateral agreements. Similar reluctance exists when it comes to national services’ willingness to supply expertise with information.

Of course, problems with the oversight of intelligence services are far from novel – concerns with the activities of intelligence services have been a recurring feature throughout the post-1945 period, including concerns about infiltration in highest places of government (such as then West German Chancellor Willy Brandt’s special advisor, Günter Guillaume), double agents (such as the infamous ‘Cambridge Five’) and ‘cowboy’ intelligence activities in diverse parts of the world (such as Jamaica and Northern Ireland). In the US, concerns about the activities of the intelligence services led to a formalization of oversight in the 1970s. In debates over the regulation of intelligence services, one does not have to look very far to encounter the trade-off
between the functional prereq- uisite to operate covertly and the ‘costs’ of being accountable and transparent to a sceptical political class and a wid- er public. Constitutional courts, such as the Ger- man federal constitu- tional court, have been highly critical regarding proce- dural protection against the abuse of discre- tionary powers. Courts have, therefore, become regulators in their own right.

Intelligence services are very dif- ficult to control - neither their daily activities nor their achievements are easily observable. Only failure can be identified, and here it may have to do more with blame-avoiding behaviours of others than actual failure. There are some controls over inputs, and one may be able to assess procedural appro- priateness. One traditional tool in such cases is to rely on ‘professionalisation’. By careful selection and training, intelli- gence services are supposedly commit- ted to constitutional values. But such a strategy is somewhat problematic in an age where the priority is massively expand and the security state relies on ‘security cleared’ contractors. Such bureaucratic recruitment drives are marred by severe difficulties, as noted by Rizzi and Borden in this issue.

The wider environment in which intelli- gence services operate has also changed. There have been traditional differences in official acknowledgment; for exam- ple, the UK intelligence services were only officially recognised in the late 1970s and early 1980s. Some intelligence services now publish their addresses (even pictures of their buildings), and the actual identity of their leaders is publicly known. Yet, the availability of information on budgets and staffing numbers remains less open. In contrast to the world of three or four decades ago, there has been a notable trend towards ‘voluntary accountability’ to appeal to public support and legitimacy.

This emphasis on self-presentation is mirrored by extensive changes in the wider oversight ecology. There has been an increasing reliance on internal legal clearance procedures. This has, in turn, led to a considerable growth of in-house lawyers to provide advice on the legality of particular operations. Such a growth in formal legal requirements might be interpreted as a response to the (percep- tion of) distrust of politicians and a fear of ‘moral panic’ about revelations re- garding particular operations. To some, this juridification represents a challenge to the execution of the core functions of intelligence services.

Furthermore, there has also been a rise in internal watchdogs and oversight bodies. In the US, the role of the Inspec- tor General has changed from an earlier age in which a position in that office was seen as a ‘recovery period’ from tricky intelligence operations. Instead, since 1979 when the position was placed on a statutory basis, the Inspector General has become increasingly resource- ful and distant from the intelligence services.

In the UK, there has been a re- markable change in parliamen- tary oversight, partly in re- sponse to pressures from the European Conven- tion of Human Rights. The First Intelligence and Security Committee (ISC) was a statutory, not a parliamentary, committee; it reported to the prime minister, who was hand-picked by the prime minister and operated in closed sessions, with its reports being prone to redactions. Requests for information could be refused on grounds of sensitiv- ity. The Justice and Security Act 2013 made the ISC a committee of parliament with extended powers of oversight, and with members being appointed by Par- liament (following nomination by the Prime Minister in consultation with the Leader of the Opposition).

Whatever the formal standing of legis- lative oversight committees, their actual role is problematic as committees are supposed to play a dual function in providing both support and oversight. A too critical oversight performance, one that is also linked to critical commentary in the media, is likely to lead to a break- down in the relationship between the parliament, the committee and the intelligence services. At the same time, too much ‘cheerlead- ing’ for the intelligence services will also be seen as problematic, as is an ‘ostrich’ style oversight in which parliamentar- ians are seen to be avoiding any form of difficult confrontation – only to be the first to criticize intelligence services once (issues have appeared in public).

Similarly, as noted by Amy Zegart (2011) in the case of the US, oversight is limited by a lack of interest by legislators (the oversight of intelligence services being unlikely to be a vote-winner in constitu- encies) and by lack of power over budgetary appropri- ations. Other observers suggest that politicians might be keen to play to the gallery of public attention in times of failure and public out- cry, but they will be reluctant to engage when difficult choic- es are presented to them. There are also questions as to how to bring together different parlia- mentary oversight bodies.

According, concerns have arisen as to the background of potential appointees, with ‘insiders’ being seen as ‘too close’, whereas outsiders are viewed as potentially ineffective due to lack of inside knowledge.

Regulatory overseers might not have the problem of limited political attention spans, although they face similar issues when it comes to questions of ‘critical distance’. Their specific challenge there- fore is to highlight to the wider public that they are engaging in active and criti- cal oversight, without necessarily reveal- ing the extent and the content of their interactions. How, therefore, such bodies are accountable, and how they pursue strategies of engagement with interested parties (and who is regarded as a legiti- mate party) remains highly controversial within and across jurisdictions.

Oversight is also problematic when it comes to international cooperation. One country’s legal interpretations of international human rights conventions might differ from another country’s.

The regulation of intelli- gence services in an age of international cooperation and modern communication technolo- gies is therefore one of the most vexing problems in the regulation of contem- porary executive power. The tensions identified by Bentham are impossible to design away; tensions between civil liberties and security concerns, the role of competing understandings as to what counts as evidence, how to ensure the upholding of constitutional values, and how to sustain critical, but non-adver- sarial oversight constitute some of the most important questions facing liberal democracy in an age where fears about security are integral to the political and public agenda.

References
Martin Lodge is Director of eur. ‘As part of the Regulation in Crisis?’ seminar series, eur held a workshop on the regulation of homeland security, bringing together lead- ing practitioners and academics.
In managing risk, organizational ac-
tors are constantly engaged in the
work of representing it. From a phil-
osophical point of view, this co-min-
gling of risk and representation is un-
surprising. Risks are contingencies or future possibilities which have not yet
crystallized into events. As non-real possibilities, they literally do not exist and
cannot be seen until they are rep-
resented and processed in apparatuses
for their management. On this view the un-
reality of risk, in the fu-
ture can only be made real and actionable in the
present by being somehow captured and represented.

So when we look closely at risk man-
agement in the field, we see that practices are littered with arte-
facts which contain representations of
risk. Documents and records like risk maps
are known to be im-
portant artefactual mechanisms through which organizational agents contribute to, visualize and sustain organizational prac-
tices over time. We also find that the work of managing risk is en-
tangled with instit-
tutional frameworks for accountability, and we need to understand better how these
frameworks emerge and shape work
processes, and how organizational ar-
tfacts are arranged in infrastructures for representing and organizing this
riskwork.

Routines and risk
Studies of organizational routines and of the central role played by artefacts provide the analytical and empirical
materials for how we might think about, and approach, the analysis of risk management practice. An ‘arte-
factual turn’ in risk studies could be based on the following questions: What is the infrastructure of artefacts through which risk is routinely identi-
fied, communicated and acted upon? How do these artefacts have agency in shaping both the risks which routine-
ly get attention and the form of that action? As analysts, we should not rash to judge whether this is an improvement or not, although as citizens and taxpay-
ers we rather hope so.

Artefacts and risk infrastructure
This artefactual perspective on risk management is not intended to de-
focus risk management practice but to under-
stand better its processes. After all, as Atul Gawande argues in his well
known celebration of the checklist as the embodiment of accumulated knowledge and expertise, real lives are saved by pilots and surgeons using well designed checklists. In these cases the artefact of the checklist is close in space and time to those making deci-
sions about flight safety and surgical risk respectively. Following the check-
list mitigates the risk of human error, imperfect memory, and unnecessary
variation in the performance of a criti-
cal task and its consequences for life.

And yet, even in this worthy example, a checklist is a more complex artefact than it first appears. Firstly, the form of the checklist often has a distinct history, usually emerging from inci-
dent investigations and analyses. Secondly, the checklist as an artefact may not have an organizational life solely for the benefit of in situ pilots and surgeons. It may persist as an organization record allowing others to judge compliance or to conduct an in-
vestigation. In short, the checklist may exist in a system of linked artefacts which make the actions of the pilot and surgeon visible and accountable to others – hospital and airport managers, investigators, regulators, and so on.

So, on the one hand, there seem to be artefacts like Gawande’s checklists which embody a clear purpose and which are co-extensive with managing risk. On the other hand, there seems to be a class of artefacts which are systemically organized to build up accounts of performance or to permit forensic ex post investigation of perfor-
mance. These artefacts have a different

organizational trajectory from the first kind; they can move very far from the routines with which they are associated and become aggregated as performance representations which are stored and subject to further analysis.

The empirically interesting artefacts, such as risk registers, sit at the bounda-
ry between the first order management of risk and these wider systems for per-
formance accountability. They generate critical questions such as: under what conditions do organizational actors become distracted by this forensic role of risk management artefacts?; what might be the consequences of such a shift in their attention?; could these consequences, understood broadly as the risk of accountability ‘crowding out’ performance, themselves be represent-
ed within the risk management system?

In general, the system of artefacts – approach being proposed recognizes that organizational actors who engage in the routine management of risks are also producing artefacts whose trajec-
tory constitutes the ‘regulated life’ of an organization and in which traces of their work are inscribed. In such cases the work of risk manage-
ment auditable by others; riskwork at the granular level may therefore often implicate auditwork.

Riskwork and auditwork
The strength and effects of a so-called ‘logic of auditability’ in risk manage-
ment, and its embeddedness in a con-
structed system of artefacts, one may
move for explanatory and empirical enquiry. For many years, risk management scholars have been concerned about whether the tail of audit and accountability, and possible blame, wag the dog of risk manage-
ment. Many studies suggest that or-
ganizational agents focus as much on
managing the risks to themselves and their reputations by constructing de-
fendable audit trails which may actual-
ly increase overall risk.

Yet, while there is a general awareness of this issue both by scholars and also
by those who work in regulation and risk management, borrowing the ‘ar-
tefactual turn’ from routines theory encourages analysis to move beyond general assertions about ‘blame avesta-
tance’, ‘reputation management’, or ‘ef-
gitisation’ strategies in characterizing the side effects of accountability for risk management. The system of arte-
facts perspective strengthens the ana-
lytical and empirical focus on how spe-
cific artefacts shape both attention and action in the risk management field.

In short, I propose that an artefactual
turn within risk studies supports a possible empirical programme focused on the dynamic relation between what I call ‘auditwork’ and ‘riskwork’.

Finally, an essential tension between action and representation exists at the heart of all organizational routines. It gives them their dynamic properties and this is especially true for the rou-
tines that constitute risk management practices. Situated human actors nav-
igate the so-called ‘risks of risk man-
gement’ posed by a world of artefacts and as analysts we have an opportu-
nity to observe their skill and effort, sometimes resisting and sometimes succumbing to a logic of auditability which can be pervasive and powerful.

The different contributions to Risk-
work: essays on the organizational
life of risk management (Oxford Uni-
versity Press, 2016) provide a body of
evidence about the effortful nature of risk management practice in many different settings. Routines theory provides the conceptual apparatus and empirical sensitivities to take this agenda further.

This is an abbreviated version of the es-
say ‘Postscript – on riskwork and audit-
work’ in Michael Power (ed.), Riskwork:
theses on the organizational life of risk
management, Oxford: Oxford Universi-

Michael Power FBA is Professor of Accounting at the London School of Economics and Political Science and a former Director of the Centre for Economic Performance.
We welcome two new research officers to SmartGrowth UK: Alex Griffiths and Jeremy Brice. Alex joins us from the UK Prosperity Fund for a study on the UK’s future workforce, and Jeremy was awarded an honorary doctorate at the University of Sheffield for his career in scriptwriting for television.

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Carr publications

- Competition and regulation in electricity markets. Edited by Sebastian Eyre (with Michael G. Pollitt), Cheltenham: Edward Elgar.
- Measurement instruments and policies in Africa. Lydie Cabane (with Josiane Tantchou), Revue d’anthropologie des connaissances 10 (2).

Carr events

- Better regulation: the Business Impact Target and the way forward jointly held with the National Audit Office.
- The QUAD consortium had its second meeting on ‘customer engagement and negotiation settle- ments in water regulation: towards a transformed regulatory state?’ Eva Heims and Martin Lodge.
- The QUAD consortium held its second meeting in Paris in September. The TransCrisis consortium met in Stockholm in September to discuss progress across the different research activities. In particular, it focused on work on two work packages: research on the institutional capacities of the European Commission in terms of crisis management, and work on ‘backsliding’ in EU norms and provisions across member states. The meeting also included a contribution by Claus Sorensen, former director general of Humanitarian Aid and Civil Protection, and Communication in the European Commission.

Carr talks

- Lydie Cabane was a discussant at the seminar ‘Shaping Crisis, Devices, Technologies and Organizations’ at IFRIS in Paris in October.
- Bridget Hutter has been appointed to the Environment Agency’s Long-Term Investment Scenarios Development Group. She has also been appointed as chair of the Scientific Advisory Board of the Nordic Societal Security research programme and in June attended a meeting of the Scientific Advisory Board and Annual Conference of the Nordic Societal Security research programme, Reykjavik. In September, she participated in an early career workshop on ‘The Opportunities Practicalities and Constraints of Socio-Legal Scholarship’ at the European University Institute (EUI).
- Martin Lodge presented papers at the ECPR European Union conference in Trento on ‘salience and transboundary crisis management regimes’ (with Lydie Cabane), at the ECPR Regulation & Governance conference in Tilburg on ‘transparency and transnational regulation’ (with Christel Koop), at the PMRC conference in Aarhus on ‘reputation and transparency’ (with Madalina Busuioc), at the IPA conference in Poznan on ‘customer engagement and the regulatory state’ (with Eva Heims) and at the APSA conference in Philadelphia on ‘exit or loyalty: dynamics in local authority inspections’ (with Chris van Stolk). In September, he was also keynote speaker at the ‘Governance, Innovation and Development’ conference organized by the Brazilian civil service school ENAP and the Brazilian Ministry of Planning.
- Andrea Mennicken organized, with Mike Power, a workshop on ‘Accounting, Fact, Value’ at the LSE in May. She presented her PhD papers at the EGOS conference in Naples on ‘dynamics and limits of regulatory privatization’ and at the annual conference of the American Society for Public Administration in November. She also contributed to a conference on university governance and management in London.

Carr news

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