

A COMPARATIVE ANALYSIS OF PUBLIC ACCOUNTABILITY MECHANISMS

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Abstract. This comparative analysis defines public accountability mechanisms as essential tools in public governance, highlighting their role in ensuring transparency, responsibility, and effective oversight. The study aims to articulate these mechanisms, explain why they exist, and explain why they are essential in ensuring good governance. It also examines various examples of the broad ways in which officials can be held accountable. Fundamental mechanisms include performance evaluation, transparency, audits, and legal basis. This comparative study contrasts public accountability devices in the United States, China, the United Kingdom, India, and Scandinavian countries. The goal is to identify similar and different strategic means by which these devices are realized, and highlight the impact that this has on transparency, efficiency, and public trust in governance. The study analyzes these various approaches to provide insights into what has worked in public accountability and where efforts for improvement might be made. This contributes to the formation of a better understanding of how different governmental systems help to improve accountability and develop public trust through good administrative practices.

Keywords: public accountability, administrative transparency, accountability mechanism, public trust.

Introduction

Public accountability describes government agencies and public officials' responsibility and answerability for their actions, maintaining transparency, ethical behavior, and efficiency. Globally, public accountability is critical in maintaining trust between the government and citizens by avoiding power abuse and promoting fair governance (Kankpang & Nkiri, 2019). Mechanisms such as audits, performance evaluation, and judicial oversight are domains that evaluate and monitor the government's performance. In democratic systems, accountability helps to maintain the effectiveness of decisions made in citizens' interest, maintain the rule of law, and prevent the misuse of resources.

In recent years, the field of administrative law has witnessed significant scholarly attention, particularly in the context of Central and Eastern European countries. The book *Comparative Administrative Law: Perspectives from Central and European Countries* (Deviatnikovaitė, 2024) offers a comprehensive analysis of the evolution and current state of administrative law in this region. It highlights the various reforms and challenges faced by administrative systems in transitioning countries, while also comparing them to Western European models. This work provides a critical perspective on how administrative accountability is understood and applied across different legal systems, offering valuable insights for researchers and practitioners alike.

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Transparency, efficiency, and trust are at the core of democratic societies and, as such, operate as a foundation of public governance accountability. These grounds help to make public officials credible in terms of their responsibilities, decisions, and trust, creating a culture of honesty and accountability (Schmidhuber et al., 2021).

Firstly, accountability makes the actions of the government available and easy for the public to comprehend. When officials need to be held responsible for their decisions and actions, nothing will likely happen in their favor (Schmidhuber et al., 2021). Transparency gives citizens information about how the government spends their taxes and about the outcomes of public policies. It is essential for a working democracy that citizens are allowed to see how their governments behave so they can make informed decisions and keep their leaders accountable (Gorwa & Ash, 2020).

Second, accountability increases efficiency in public governance (Solomon, 2020). Public officials tend to perform their duties better when the authorities watching them are also being watched. Performance audits and evaluations are accountability mechanisms through which we learn where to improve and can ensure that public resources are used optimally (Ferry et al., 2023). This results in better service delivery and more effective public policies.

Additionally, the government and its citizens can develop trust through accountability. Trust is a key component of a stable and prosperous society, and that trust is built on transparent and consistent communication regarding the ethical behavior of public officials (Chen & Wan, 2020). Citizens always appreciate and encourage accountability.

This article focuses on the concept of public accountability within administrative law, examining how political institutions are held responsible for their actions. Public accountability refers to how public officials and institutions are answerable to the public, ensuring transparency and ethical governance. The research aims to explore accountability mechanisms in different countries, with an emphasis on comparative approaches to understanding how various systems function. The article also seeks to answer several key questions, including how public accountability can be improved in different contexts and which methods are most effective. To achieve this, the research uses a comparative methodology, examining case studies from various countries and analyzing the strengths and weaknesses of each. The findings aim to provide insights into how public accountability can be better integrated into administrative law.

The article explores both legal and political aspects, which is to be expected as administrative law inherently concerns the governance of politics. This dual perspective is appropriate and provides a comprehensive overview of the subject. The current study aims to identify different public accountability mechanisms, which involves articulating what these mechanisms are, their purpose, and how important they are for public governance. It also aims to provide a broad definition, purpose, and examples of how officials can be held accountable. The mechanisms used include several domains – for example, performance evaluation, transparency, audits, and legal frameworks (Vian, 2020).

The research aims to examine public accountability mechanisms in governance, specifically focusing on how different countries implement transparency, responsibility, and oversight to ensure effective public governance. The main tasks include identifying key accountability mechanisms, comparing their implementation across various countries, and analyzing the impact on transparency, efficiency, and public trust. The research uses a comparative methodology, examining case studies from the United States, China, the United Kingdom, India, and Scandinavian countries. Data is gathered through document analysis, interviews, and secondary sources such as government reports, academic articles, and policy papers.

1. The comparative nature of the study and public accountability mechanisms

1.1. Comparative study

Transparency, efficiency, and trust in public governance need public accountability mechanisms (Ardigó, 2019). This comparative study investigates public accountability mechanisms in the United States, China, the United Kingdom, India, and Scandinavian countries to identify commonalities and differences.

From the perspective of democracy and the separation of powers, public accountability is deeply entrenched in the United States. The primary mechanism here includes judicial review and a comprehensive system of checks and balances (De Benedictis-Kessner & Warshaw, 2020). The Government Accountability Office (GAO) audits federal agencies to determine compliance with laws and regulations, and the Freedom of Information Act presents transparency based on citizens' access to information in government (Finn, 2021).

The nature of public accountability in China is distinctly different from that in other countries because of its single-party system (Ping et al., 2022). The primary sources of accountability are internal and are dominated by the Communist Party in its functions concerning government operations. Accountability is within the purview of the Central Commission for Discipline Inspection, which investigates corruption and ensures party discipline (Liao & Tsai, 2020). Some work is indeed being done to increase transparency, such as through the Open Government Information regulations, but this is not as intensive as in democratic systems (Ripamonti, 2024).

A modern account of accountability and oversight exists in the United Kingdom, combining traditional parliamentary oversight with contemporary accountability mechanisms (Papadopoulos, 2023). The scrutinization of government expenditures and policies falls to Parliamentary committees, e.g., the Public Accounts Committee, and the National Audit Office is an independent public sector organization auditor (Ferry et al., 2023). The United Kingdom also has a long tradition of judicial review, which permits the courts to review the lawfulness of administrative action.

India's democratic framework and federal structure are reflected in the country's public accountability mechanisms (Khosla & Vaishnav, 2021). The Comptroller and Auditor General carries out audits as regards government accounts and reports to Parliament, while the Right to Information Act allows citizens to ask for information from public authorities (Relly et al., 2020). To strengthen accountability, it is necessary to monitor cases against corruption, which is a task that falls to the Central Vigilance Commission (Sharma & Virk, 2023).

The high levels of transparency and low levels of corruption in Scandinavian countries guarantee that a combination of legal and cultural mechanisms is employed to achieve accountability (Lytvyn et al., 2023). In Sweden, citizens have an institution, the Ombudsman, with which to file complaints about public authorities. Similar institutions in Denmark and Norway oversee public administration, ensuring that the laws are complied with (Kumar & Sharma, 2022). These include open government data and citizens' participation in the decision-making process.

The comparative analysis of public accountability mechanisms in the United States, China, the United Kingdom, India, and Scandinavian countries reveals stark differences influenced by each country's political and cultural contexts (Chaturvedi, 2023). In the UK and the US, parliamentary oversight and judicial review function automatically. In contrast, in China, every check and balance is automatic, but the mechanism lacks transparency (Rose-Ackerman, 2021). India brings legislative pull through strong transparency laws, like the Right to Information Act, to bring public access to information, while Scandinavian countries, which see high transparency and low corruption, have been known to possess legal frameworks mixed with a strong culture of public engagement and open data initiatives (Kankpang & Nkiri, 2019). Such diversity underscores the significance of designing and engineering accountability mechanisms paired with governance arrangements and local cultural contexts to foster transparency, efficiency, and public trust (Gupta et al., 2020).

1.2. Public accountability mechanisms

1.2.1. *Legal accountability*

Laws, regulations, and judicial review are essential to accountability. Laws are formal rules produced by governmental bodies (Brewer-Carias, 2023), determining what behavior is appropriate and what is not, and laying out penalties for infringement. They are used to maintain order, protect individual rights, and encourage justice. Regulations are critical to ensure that laws are not only established but also properly implemented, giving a clear framework for societal behavior. By establishing clear rules and sanctions, they prohibit wrongdoing, encourage accountability, and develop an atmosphere in which individuals and organizations can operate with confidence and fairness (Abbott & Snidal, 2021). Thus, they tend to deal with specific matters in more general judicial authorities to enforce corresponding law provisions coherently and effectively.

Judicial review is one of the fundamental characteristics of any legal system, and imparts upon the courts the power to examine judicial acts. Administrative branches ensure that those acts conform to the constitution and are agreeable to other legal standards (Cass et al., 2024). This is a case of checks and balances, ensuring that people do not abuse power. An important check on progressive or counter-progressive trends is that courts can declare conservative, illegal, inappropriate, or simply biased laws or regulations null and void via the mechanism of judicial review (Masnov, 2021).

Concurrently, these mechanisms make up a robust system of accountability (Laebens & Lührmann, 2021). Standards are set through law, regulations specify the implementation of details, and judicial reviews see that implementation occurs justly. This interplay reinforces public trust in the legal system and facilitates a just and orderly way of life.

Moreover, political accountability includes elected officials, political parties, and the government (Nyberg, 2021), who represent their constituents, make decisions, and pass laws according to the wishes of those who elect them. Political parties are vehicles by which voters are organized and mobilized (Luna et al., 2021), through which programs and policy choices are advocated for. The parliamentary administration, made up by elected representatives, ensures that the law is carried out correctly (Bar-Siman-Tov, 2020). This covers everything from reviewing government action to holding hearings to investigating misconduct. In combination, these elements bring transparency, accountability, and responsiveness to governance, which means that public officials act for the betterment of the people.

Internal audits and performance evaluations are essential to bureaucratic accountability (Raffler, 2022). An audit is an organization's comprehensive review of all financial records, where all records are verified in terms of the funds being used to detect fraud and mismanagement. This ensures compliance with applicable laws and regulations. Internal audits can be performed by agency staff or independent bodies. Audits often result in recommendations for improvements to financial practices regarding operational efficiency (Eulerich & Eulerich, 2020).

The effectiveness and efficiency of employees and programs are evaluated during performance evaluation. In these evaluations, objectives and KPIs are regularly reviewed, and feedback is provided (Ardigó, 2019; Han, 2020). They help us understand what employees are good at and where they may need extra training or support. Performance evaluations also ensure that programs are accomplishing what they intend to and are producing results that are valuable to the public.

Together, audit and performance evaluation work to create a system of checks and balances inside agencies (Babalola, 2020). Transparency is these agencies' form of promotion, as they keep operations and finances transparent and accountable while staying ahead in their respective industry. These internal mechanisms provide a feeling of trust in government agencies through efforts regarding responsibility and excellence (Hardiningsih et al., 2022).

1.2.2. *Public and social accountability*

Promoting accountability depends on media, civil society, and public opinion. The media investigates, reports on, and informs the public of government actions (Alawattage & Azure, 2021; Brewer-Carias, 2023). Organizations in the civil society network organize citizens and campaign for policy changes (Pinckney et al., 2022). The media and civil society influence public opinion and pressure officials to act responsibly and transparently. These elements can create an educational axis of informed citizens who demand accountability (Brewer-Carias, 2023).

1.2.3 Ethical and professional accountability

Administrative behavioral standards and ethical responsibility codes include basic administrative ethics and codes of conduct (Brewer-Carias, 2023). The standards that public servants have to follow include valuing integrity, transparency, and impartiality. They act as a framework for decision-making and work to prevent conflicts of interest, corruption, and abuses of power. If these codes are followed, the administrators can maintain public trust, uphold the law, and provide services reasonably and efficiently. Regular training and enforcement of these ethical guidelines guarantee that all employees know and agree to adhere to strict principles of professional conduct (Trevino & Nelson, 2021).

2. Accountability mechanisms in different countries

2.1 The United States

The United States has a sound structure for government accountability, embodied in the Federal Government and symbolized by the Government Accountability Office (GAO) and Inspectors General. The GAO serves as an independent, nonpartisan, nonpolitical agency of Congress and performs auditing, evaluation, and investigative functions. As for its mission, this highly regarded institution is charged with enhancing federal performance and promoting greater responsibility to the American populace. The performance audit is one of the investigative techniques employed by the GAO to solve national and global issues, enhance program performance, cut costs, and make decisions (*Consumers' Research v. Federal Communications Commission*, 2023).

The Inspectors General (IGs), created by the Inspector General Act of 1978, contribute to increased government accountability. They are policy-oriented entities within Federal Agencies that perform audits and investigations to help detect fraud, waste, abuse, and mismanagement. IGs offer fact-based information to decision-makers and the public to clarify issues concerning government operations. They also propose measures to enhance the economy, efficiency, and effectiveness of the agencies of the Central Government (*United States v. Arthrex, Inc.*, 2021).

In this way, the GAO and IGs are essential in ensuring effectiveness and accountability in government operations. They assist in preventing corrupt practices, measuring conformity, and evaluating the performance of agencies and government departments. Some areas of specialization include auditing and evaluation, investigations, and providing solutions to increase the efficiency and effectiveness of the government (*Seila Law LLC v. Consumer Financial Protection Bureau*, 2020). All of these mechanisms are essential for enforcing the standards of public accountability, enhancing propriety in the utilization of public resources, and ensuring the proper accountability of government officials.

2.2. The United Kingdom

The two concepts of parliamentary oversight and Ombudsman systems form part of the accountability apparatus in the United Kingdom, which enables the country to ensure that government activities are conducted with a view towards the citizenry's interest (Bar-Siman-Tov, 2020).

The principal way in which the UK Parliament exercises oversight is through committees. These select committees include the Public Accounts Committee (PAC) and the Public Administration and Constitutional Affairs Committee (PACAC) (Kirkham, 2022). The role of the PAC is to analyze the welfare of the government's investments and the aims and objectives of projects, and to scrutinize the government's expenditure. It examines reports from the National Audit Office (NAO), an independent

auditor of government bodies. The PAC interviews government personnel regarding the NAO's report and provides recommendations to control public expenditure.

On the other hand, the PACAC supervises quality and standards in public administration and constitutional affairs. It examines numerous organizations, such as the Parliamentary and Health Service Ombudsman (PHSO), to identify how well they are doing their jobs (Kirkham & Stuhmcke, 2020). The duties of PACAC also entail "Scrutinizing the expenditure, monitoring the supply of public services, and holding the executive accounts" (Kirkham & Stuhmcke, 2020).

In the UK, complaint systems related to the functioning of public organizations and services are served by several ombudsperson services. The most visible among them is the PHSO, which is responsible for the management of complaints of members of society who feel unfairly treated or let down by the Prime Minister's departments, NHS England, as well as other governmental and related establishments (Kirkham & Stuhmcke, 2020; Ngatikoh et al., 2020). The PHSO is supervised by a Parliamentary Commissioner for Administration but is entirely independent of government departments and directly accountable to Parliament.

The Local Government and Social Care Ombudsman is responsible for complaints regarding the local authorities and social care providers in England and Scotland. The Public Services Ombudsman has the authority to investigate complaints against public service providers in Scotland. These Ombudsmen are essential in monitoring the equity and effectiveness of service provision at the local level, and taking care of complaints about maladministration and acts of poor service (Chen, 2023). The parliamentary oversight and Ombudsman systems in the UK are compelling; invariably, these mechanisms level the playing field regarding government accountability (McBurnie, 2020).

2.3. India

Judicial review and the Central Vigilance Commission (CVC) have remained central to the structure of Governance in India, especially in recent times. The judiciary, through the power of judicial review, monitors whether the executive and legislative organs act within the Constitution. In contrast, the CVC deals with the issue of misconduct in Government (Fischer, 2020).

In India, the judiciary, particularly the Supreme Court and the High Courts, has exercised its veto power to advance accountability through historic decisions. One notable instance in recent years relates to the Supreme Court judgment which directed the setting up of Police Complaints Authorities to deal with police brutality and the violation of rights (Fischer, 2020). This judgment made the point that the judiciary can step in and ensure that the enforcement machinery is used following the law and is not abused.

In the fight against corruption, the CVC, created to oversee vigilance across central government bodies, has been particularly significant. Over the last few years, the CVC has initiated several high-profile investigations and reforms. For example, the CVC played a vital role in the 2021 inquiry regarding alleged irregularities in procuring a leading public sector enterprise (Ardigó, 2019; Baxi, 2022). The CVC's findings triggered sweeping administrative reforms and formalized a stricter set of procurement rules to avoid interdictions in the future.

2.3.1. Case Study: *Prakash Singh v. Union of India (2020)*

The Public Interest Litigation was filed by Prakash Singh, a former police officer, who petitioned for police reforms, accountability, and transparency in the police force. Based on the Supreme Court's judgment, states and districts were asked to create of Police Complaints Authorities nationwide to look into complaints against police officers. This was intended to curb police excesses and to provide citizens with an avenue in seeking redress for grievances against members of law enforcement agencies (Gorwa & Ash, 2020; Hu & Conrad, 2020; Schmidhuber et al., 2021).

2.4. Scandinavian Countries

Openness and public concern in governance mechanisms is seen in the more developed Scandinavian countries of Denmark, Norway, and Sweden. These nations can be counted on to remain among the least corrupt in the world because they have substantial safeguards against corruption.

2.4.1. *Transparency mechanisms*

The right to view official papers that are owned by a government body is known as public access in Scandinavia countries. By exposing government acts to scrutiny, a transparent process fosters accountability and confidence between the government and its constituents (Lee, 2007). Giving people the choice to select information regarding policies and accuracy makes public access more effective and encourages more democratic engagement. For example, Sweden's dedication to openness and public access to information is anchored by the Freedom of the Press Act, which was passed in 1766 (Lee, 2007). In addition to granting public access to official papers, this law safeguards journalists' freedom to report on government actions (Lee, 2007). Citizens are now more equipped to participate in democratic processes and hold their government responsible thanks to the Act's promotion of an open culture. The law also makes it possible for anybody to request access to public documents, which makes it one of the most progressive transparency systems in the world. (Magnússon, 2020). Ensuring that public officials are held accountable for their acts and fostering trust between the government and its constituents have both benefited greatly from this dedication to public access (Magnússon, 2020).

The Freedom of the Press Act continues to play a significant role in Swedish politics and influences comparable transparency efforts abroad. Denmark also has similar laws that require the release of government information, which cuts down on corruption and the embezzlement of public funds (Tonhaeuser & Stavenes, 2020).

In addition, public participation is a part of the governance frameworks in Scandinavian countries. The civil societies in these nations promote people's participation in various ways – consultations, referendums, and participatory budgeting (Simonofski et al., 2021). For example, in Denmark, people can participate in making budgetary decisions and thus judge how public money is spent. This participatory approach improves government transparency and addresses a significant issue: that decisions made are congruent with the people's point of view.

2.4.2. *Case study: Denmark's open budget process*

Denmark encourages citizens to access its budget plans. The government also ensures that it releases a detailed budget on government expenditure to citizens to be reviewed. This process is acknowledged by the Open Budget Index, which has ranked Denmark among the best regarding its budget (Boeree et al., 2021). This process keeps citizens close to implementing the budget so that the utilization of their money is effective, and any action taken by the government is most appropriate.

Citizens' participation in Scandinavian countries is not limited to formal structures, as there is high volunteerism in the area of community participation. For example, a very high percentage of the adult population in Norway volunteers to work in organizations and participate in community activities. Due to this culture of civic engagement, social dilemmas are minimized, and trust, cooperation, and governance are increased.

2.5. China

In China, accountability mechanisms are intrinsically linked to the structures and operations of the Chinese Communist Party (CCP) and its hierarchical administrative controls.

Party-based accountability forms an integral part of governance, whereby party members and officials have to conform to the policy and directives of the CCP. There is a system of enforcement, ultimately

enforced by a combination of internal party rules, disciplinary action, and performance evaluations (Qin & Owen, 2023). Simply put, the role of the Central Commission for Discipline Inspection is to monitor and investigate party members, to oversee the quality of ethical standards, and to unearth corruption.

However, hierarchical administration controls accountability by dividing the government into separate tiers that specify authority and responsibility (Cass et al., 2024; Reddick et al., 2020). Each level of government is accountable to each level below it. This structure guarantees that policies and directives issued by the central government are put in place consistently throughout the country. The key to this is reflected in the cadre management system, where officials are measured in terms of their performance and compliance with party policies (Schillemans et al., 2021). These evaluations serve as a basis on which promotions and career advancement are often contingent, leading to strong incentives for compliance and high performance.

2.5.1. Case study: Earmarked Project System

A notable case study with which these mechanisms are illustrated is the Earmarked Project System, which analyzes how authority and accountability are distributed in Chinese government hierarchies (Shen et al., 2024). This system advocates for interdepartmental competition and expansion with a top-tier ranking over lower-tier government driven by incentives and strict oversight. One example is the use of technology to monitor bureaucratic performance and facial recognition for tracking attendance on digital platforms when conducting performance evaluations. These tools also make things more transparent and offer fewer opportunities for corruption.

3. Comparative analysis, challenges, and emerging trends in public accountability

3.1. Strengths and weaknesses of different mechanisms

Some task markets are good in corporate governance, and some are not. For example, some are efficient in limiting the most threatening areas of managerial incompetence. Several different accountability mechanisms offer varying degrees of strengths and weaknesses and can be successful or not in various contexts.

Internal accountability mechanisms include several advantages, such as close alignment to organizational goals, and can be implemented quickly (Ghonim et al., 2022; Kirkham & Stuhmcke, 2020). However, they can be biased and opaque, undermining their credibility. External accountability mechanisms include regulatory oversight and third-party audits. They create a transparent environment and provide stakeholders with an impersonal point of view for trust. At the same time, they can be costly and time-consuming, which may cause delays or incentives to the decision-making process (Silva et al., 2023).

Social accountability mechanisms include public reporting, community monitoring, and other stakeholder empowerment tools (Guerzovich et al., 2022). This domain enables transparency and responsibility. Importantly, these mechanisms can result in significant improvements in service delivery and governance that often come with the threat of stakeholder avoidance and conflicts of interest.

Legal accountability mechanisms concern judicial reviews and legal penalties to enforce laws and regulations, and act as a sign of deterrence against misconduct. However, they are adversarial, and lengthy legal processes are often necessary (Brewer-Carias, 2023).

3.2. Cultural and institutional influences on accountability

The effectiveness of accountability systems is significantly determined by culture and organizational structures. Perceptions of accountability are a function of cultural norms and values in shaping what happens when a rule is created and what happens when a rule is enforced (Abhayawansa et al., 2021). Using hierarchical structures may discourage open communication and transparency in cultures with large power distances, where the accountability mechanism cannot be as effective (Læg Reid & Rykkja,

2022). However, cultures that support and motivate transparency in the accountability system thrive. Legal and political frameworks have institutional structures that also play a significant role. The enhancement of accountability is apparent in robust legal systems with clear regulations and independent judiciary bodies that involve multiple stakeholders in the decision-making process (Lægreid & Rykkja, 2022; Rose-Ackerman, 2021). Accountability can be better promoted, and public participation and decentralization can be promoted through political structures.

3.3. The effectiveness of accountability mechanisms in curbing corruption

Different types of accountability mechanisms effectively reduce corruption and increase transparency in every domain (Svara, 2021). Intervening in the context of receiving information involves finding the internal mechanisms that address corruption, i.e., the internal audits and the compliance program, which promote conformity to internal policies and procedures. However, internal biases and lack of independence may limit them. Regulatory oversight and third-party audits all have an external view of operations. They are likely to reveal corruption compared to internal audits since they are independent and cover a broader scope (Orozco, 2020). While these mechanisms can drive enormous improvements in governance, they may struggle with a lack of stakeholder engagement or conflicts of interest. Legal accountability, such as judicial review and anti-corruption laws, serves as a potent deterrent to corruption due to the threat of legal action (Findley et al., 2020) which it is usually adversarial and expensive. Each approach has its strengths and challenges; in many cases, combining these approaches is the best way to strengthen control over corruption and advance transparency (Orozco, 2020).

3.4. The interaction between accountability mechanisms

The interaction of legal, political, and social mechanisms is complex; their relationships are far from clear-cut, and are often complementary or contradicting (Brochmann, 2020). Formal mechanisms of accountability and governance are drawn from the law or other forms of regulation. While they guarantee consistency and can be easily enforced, they are rigid and slow to adapt. Some political mechanisms, like government policies and administrative actions, can tackle emerging issues and quickly involve several actions to address changes (Papadopoulos, 2023).

The objectivity and stability of legal mechanisms can be lacking. Transparency and responsiveness are based on social mechanisms, i.e., public opinion and community engagement, that pressure institutions on behalf of the public (Samaratunge & Alam, 2021). However, these mechanisms are dynamic, inconsistent, influenced by cultural norms, and capable of adaptation. When aligned, such mechanisms can produce a robust accountability system in which laws are enforced, policies are correctly implemented, and public oversight maintains transparency (Ngatikoh et al., 2020). In this case, conflicts arise when political interests compromise legal norms, or social norms contradict firm legal ideals; challenges are faced in governance and accountability, but knowing how they interplay is critical to governance (Abbott & Snidal, 2021).

3.5. Challenges and emerging trends in public accountability

3.5.1. *Technological advances*

Platforms, big data, and AI improve accountability mechanisms dramatically by improving transparency, efficiency, and responsiveness (Kulal et al., 2024). Real-time reporting and public engagement are promoted on digital platforms, promoting transparency and stakeholder engagement. Big data can be used to analyze large datasets that cannot be analyzed otherwise, and instead can show patterns of misconduct and inefficiency (Samaratunge & Alam, 2021; Talesh & Cunningham, 2021).

These tools provide AI with the ability to increase predictive possibilities and automate monitoring operations, allowing it to identify and react to issues in time. However, all these technologies cover privacy concerns, personal information, and all the essentials related to an individual that are meant to maintain transparency and effectiveness.

3.5.2. Globalization and transnational accountability

International norms, agreements, and oversight significantly influence domestic accountability as they have established criteria and frameworks that govern political life. International norms like those laid down by the United Nations and other global bodies also compel countries to follow these lines and adopt domestic norms in these areas (Jongen, 2021). Through participation in international agreements like the OECD Anti-Bribery Convention and the UN Convention Against Corruption, domestic reforms are driven to some extent by mechanisms for monitoring and reporting compliance. External evaluation and pressure on countries to conform to agreed standards come through international oversight, such as from the International Monetary Fund and World Bank. However, how effectively these international influences work depends on domestic institutions' political will and ability to take on and enforce the necessary changes (Rose-Ackerman, 2021). International norms and agreements are an essential impetus for reform. Still, standards reform is ultimately conditioned by domestic commitment and the ability to adapt these standards to local contexts.

3.5.3. Accountability in authoritarian vs. democratic systems

There are significant differences between authoritarian and democratic accountability mechanisms (Laebens & Lührmann, 2021). In centralizing accountability in an authoritarian system, the power often lies with a few leaders. Many common mechanisms, such as internal audits, are limited by a lack of transparency and public participation. On the other hand, the democratic system highlights decentralized accountability with multiple connected players like an independent judiciary and public elections (Shrestha et al., 2023). While transparent and responsive, these systems are slower and more difficult due to consensus and broad participation. However, the approach reflects the regime's political structure and values.

Conclusion

In this paper, accountability mechanisms were analyzed comparatively within various contexts, highlighting their advantages and limitations. Audits and performance reviews, as internal mechanisms, are biased and not transparent enough to align with organizational goals. Regulatory administration and third-party audits are complex (Noll, 2021), time-consuming, and often costly, offering no fundamental certainty of independence and adding to the perception of an ever-lengthening list of requirements. Social mechanisms, including public reporting and community monitoring, can benefit stakeholders and be made more transparent, while their effectiveness is limited by low engagement and conflicts of interest (Wang et al., 2020).

In this paper, public accountability within administrative law was discussed; its importance was ascertained in assuring that governance is made within the realm of transparency and that public resources are effectively managed. This was achieved through comparative analysis, showing how different countries have different ways of putting accountability mechanisms in place in the different political, legal, and cultural contexts in which they operate. The research draws attention to the importance of public accountability in fostering trust between citizens and government institutions, at the same time as revealing the difficulty of enforcing it to prevent abusive practices while calling for better laws to delineate permissible activities.

The findings indicate that strengthening public accountability is vital for enhancing administrative efficiency and responding to the public's concerns regarding government practices. Different accountability models have been implemented globally, but they are only successful if their legal provisions are in line with political will and public expectations. Further research into the relationship between public accountability and citizen engagement would benefit from an examination of this in rapidly evolving digital governance scenarios. This paper improves the understanding of how public accountability mechanisms work in various administrative systems and has implications for policy that seeks to improve administrative transparency and accountability.

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