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# How community-based social enterprises struggle with representation and accountability

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## Abstract

**Purpose** – Community-based social enterprises (CBSEs), a spatially defined subset of social enterprise, are independent, not-for-profit organisations managed by community members and committed to delivering long-term benefits to local people. CBSEs respond to austerity and policy reforms by providing services, jobs and other amenities for residents in deprived communities, thus contributing to neighbourhood regeneration. This paper aims to develop a better understanding of how CBSEs perceive accountability, how they apply it in the management and representation of their business and why.

**Design/methodology/approach** – Nine case studies of CBSEs across three European countries (England, the Netherlands and Sweden) are analysed, using data from semi-structured interviews with initiators, board members and volunteers in CBSEs.

**Findings** – CBSEs shape accountability and representation in response to the needs of local communities and in the wake of day-to-day challenges and opportunities. Apart from financial reporting, CBSEs apply informal strategies of accountability which are highly embedded in their way of working and contingent upon their limited resources.

**Originality/value** – Although research has shown the complex governance position of CBSEs, their application of accountability to target communities and other stakeholders is unclear. The paper coins the term “adaptive accountability,” reflecting a relational, dialectic approach in which formal, costly accountability methods are only applied to legally required forms of accounting, and informal practices are accepted by funding agencies and governments as valid forms of accountability, assessing CBSEs’ societal value in more open terms.

**Keywords** Accountability, Social enterprises, Community enterprises, Self-organization, Neighbourhood regeneration, Hybridity, Active citizenship, Representation

**Paper type** Research paper



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## Introduction

Entrepreneurship is believed not only to improve the economic strength and innovation of countries and cities but also of neighbourhoods and communities (Mason *et al.*, 2015). However, the relationship between community and entrepreneurship is an under-studied topic in the literature, which emphasises individual entrepreneurs over entrepreneurial communities (Fortunato and Alter, 2015). Ronald Coase, the winner of the 1991 Nobel Prize for Economics, has defined the relationship between entrepreneurship and community as a new frontier for entrepreneurship research (Lyons *et al.*, 2012, p. 19).

From this perspective, the rise of various forms of community-based entrepreneurship across Europe is relevant. Many countries have been implementing austerity measures and cuts in public policy, alongside trends of welfare retrenchment. Governments are putting more emphasis on active citizenship. Citizens are encouraged to take responsibility and organise themselves to fill in gaps left by funding cuts in health care, education, employment and neighbourhood governance (Healey, 2015; Kleinhans, 2017). There is a growing EU-wide interest in entrepreneurial forms of active citizenship, such as social enterprises (SEs) (European Commission, 2014), for which there is increasing recognition of their important role in contemporary societal development. Spatially defined forms, such as community-based social enterprises (CBSEs) are described as a subset of social enterprise.

In the literature, CBSEs are defined as independent, not-for-private-profit organisations that are owned and/or managed by community members and highly committed to delivering long-term benefits to local people (Pearce, 2003; Peredo and Chrisman, 2006; Somerville and McElwee, 2011; Bailey, 2012). Members of the community often form a legally constituted management board which may employ staff as well as making use of volunteers to deliver services. The concept of hybridity, i.e. pursuing a dual mission of financial sustainability and social purpose, is a defining characteristic of SEs (Doherty *et al.*, 2014). SEs often span the boundaries of the private, public and non-profit sectors and bridge institutional fields, facing conflicting institutional logics. Combining these logics makes the governance and management of SEs a complex affair (Doherty *et al.*, 2014; Spear *et al.*, 2009). Apart from using (government) funding and applying for grants, CBSEs develop trading and non-trading activities in response to locally defined needs and by being responsive to opportunities in the local context in which they are based. Consequently, their hybridity goes beyond the dual mission of social purpose and financial sustainability, because the latter component implies a large diversity in sources of income and related financial mechanisms.

For CBSEs, the focus of this paper, the hybrid nature adds another level of complexity with regard to representation and accountability. In essence, “accountability is a relationship between an actor and a forum, in which the actor has an obligation to explain and to justify his or her conduct” (Bovens, 2007, p. 450). Whereas public institutions are usually accountable to citizens and supervisory boards, and market-sector business and enterprises are accountable to shareholders, this is not so straightforward for CBSEs. If they are owned and/or managed by community members, locally accountable and committed to delivering long-term benefits to local people, pertinent questions are to who are they accountable? (Wagenaar and Healey, 2015, p. 558). What constitutes “community” in the context of CBSEs? Many civil society initiatives, including CBSEs, are set up as charities, without any formal accountability to communities they cater for, but they may apply informal accountability, which is much less studied than formal accountability (Romzek *et al.*, 2012).

The preceding discussion raises the question how CBSEs themselves actually perceive the concept of accountability and how they deal with it in their daily practice. The

importance of accountability is widely acknowledged, but is becoming increasingly challenging in light of the boundaries between various sectors becoming progressively more blurred and with many community business that are in a network of funders, local governments and other business (Connolly and Kelly, 2011; Williams and Taylor, 2013). With one exception (Buckley *et al.*, 2017), existing research fails to show how CBSEs, a particular type of social enterprise, deal with the challenges of representation and accountability. There has been little research of how such forms of citizen involvement might be integrated with accountability concerns, despite the large scholarly interest in both issues.

This paper takes up the call for qualitative research into organisational perceptions, and internal and informal mechanisms of accountability (Connolly and Kelly, 2011, p. 235, see also Bailey, 2012; Damgaard and Lewis, 2014; Hanberger, 2009). The paper will contribute to the scientific and policy discussion on accountability of hybrid, civil society initiatives, in particular those that aim to contribute to bottom-up regeneration of deprived communities in north-western Europe. The study explores how nine examples of CBSEs deal with accountability in their businesses (Bailey *et al.*, 2018). The aim is to develop a better understanding of how CBSEs perceive accountability, how they apply it in the management and representation of their business and why they do so. This study looks beyond one specific context and explores examples of CBSE practice in three countries (England, Sweden and The Netherlands). Although we do not aim to provide a structured international comparison, our approach reflects the growing importance of such initiatives across Europe.

The next section lays the theoretical foundation for the study by discussing relevant literature on community entrepreneurship and accountability. Subsequently, our approach, data and analytical strategy are introduced. The following sections report the main outcomes from the analysis of the case studies. The final section provides a discussion and conclusions.

## **Community entrepreneurship and accountability**

### *The nature of community-based social enterprises*

In the Introduction, we explained how active citizenship is framed as a viable alternative to state-based welfare provision that is reduced by austerity regimes and welfare retrenchment. Of particular interest in the current context are entrepreneurial forms of active citizenship such as cooperatives and SEs. Like SEs, CBSEs generate a substantial part of their revenue through trading, relying upon “enterprise” rather than government subsidy to finance their social objectives (Tracey *et al.*, 2005, p. 335). Although SEs are not tied to certain localities, CBSEs define their social purpose in relation to a specific population or subgroup living in a spatially defined area (Bailey, 2012, p. 4). They are also referred to as Development Trusts (Di Domenico *et al.*, 2009; Spear *et al.*, 2009). Compared to SEs, the volume of work on CBSEs is limited and so is the number of definitions. Based on the work of Pearce (2003), Peredo and Chrisman (2006), Somerville and McElwee (2011), Bailey (2012), Healey (2015) and Wagenaar and Van der Heijden (2015), CBSEs are defined as businesses which are:

- established by people living and/or working in a (spatially) defined community;
- independent, not-for-private-profit organisations, which are owned and/or managed by community members;
- locally accountable and highly committed to delivering long-term benefits to local people, by providing specific goods or services;

- seeking to generate a surplus through (at least in part) engaging in trade in the marketplace and reinvest the surplus in the business and/or community;
- bearing economic risks related to their activity, and are very committed to involving local people and other partners in their activities.

The goods or services delivered by CBSEs may vary from community facilities (shops, pubs, second-hand stores, recreational or health facilities) to community development and even affordable housing. Initially, CBSEs need to acquire funding in various forms (grants or loans) to start up their activities. Key to the functioning of CBSEs is that they acquire assets (buildings, land or other sources) to enable growth and income-generating streams to support their social functions (Di Domenico *et al.*, 2009). In entrepreneurial terms, CBSEs look for opportunities and “niche markets” where they are not in direct competition with private or commercial interests, or where there is market failure and clear evidence that the public sector is either unwilling or unable to provide a service. Many CBSEs are located in areas of relative deprivation which have been the subject of urban regeneration policies which have come to a full stop, creating both challenges and opportunities for CBSEs (Coatham and Martinali, 2010; Kleinhans, 2017). As such, many CBSEs engaged in community development and located in areas of disadvantage, face huge difficulties to be financially sustainable (Wallace, 2005, p. 85).

CBSEs rarely work in isolation but usually cooperate with local actors, building relationships with other organisations (Di Domenico *et al.*, 2009; Somerville and McElwee, 2011). CBSEs apply community development techniques that use both external actors and sources of support and assets from within the community. CBSEs can thus be considered as a type of coproduction by focussing on voluntary involvement of service users in the co-innovation of forms of public service delivery, responding to social needs (Osborne *et al.*, 2016).

#### *Accountability and representation in the context of community-based social enterprises*

Accountability is a well-established concept in public administration, political studies and planning, but it increasingly also appears in community research. Basically,

Accountability is a relationship between an actor and a forum, in which the actor has an obligation to explain and to justify his or her conduct, the forum can pose questions and pass judgment and the actor may face consequences (Bovens, 2007, p. 450).

There are four important clarifications to be added to this definition (Bovens, 2007, pp. 454-455; see also Mulgan, 2000). First, the “actor” may be an organisation, but individuals may also be held accountable, either in a hierarchical way (e.g. ministerial responsibility in central government) or as an individual professional. Second, a forum is not by definition a single entity; actors may be “accountable to a plethora of different forums, all of which apply a different set of criteria,” creating the problem of many eyes (Bovens, 2007, p. 455). Third, conduct refers to the aspects about which information is to be provided. There may be legal, professional, political, administrative and financial accountability. Fourth, the obligation concerns the question of why the actor must render account (Bovens, 2007, pp. 454-455). The relationship between actor and forum may be either hierarchical, in which the forum formally wields power over the actor (vertical accountability), or without hierarchy, with horizontal accountability to various stakeholders in society occurring on a voluntary basis (Bovens, 2007, p. 460; see also Abouassi and Trent, 2016).

As mentioned earlier, the picture is far from straightforward in the case of CBSEs. If the CBSE is the actor and “the community” is the forum, which people constitute this forum?

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Because CBSEs are established by local people and involve local residents as co-designers or co-producers of public services, it becomes impossible to clearly distinguish between “those who govern and those who are governed” (Daugaard and Lewis, 2014, p. 266). Moreover, CBSEs often cooperate with a wide variety of other actors, such as government agencies, charities, housing providers, NGOs and business, each of which may have different relationships with CBSEs. We need an understanding of accountability that demonstrates awareness of the relational context within which objectives, responsibilities and duties develop.

Accountability, from this perspective, is all about being responsive towards ever-changing stakeholder interests. It entails responding to these interests in terms of an evolving sense of moral appropriateness that has to be nurtured within everyday business practice (Painter-Morland, 2006, p. 94).

As such, accountability is not an activity restricted to defined moments in time but a dialectical activity, requiring a constant dialogue between CBSEs, residents/users and other stakeholders. In their study of NGO accountability, Abouassi and Trent (2016) concluded that various accountability relationships — and perceptions of these relationships — gave NGOs degrees of leverage to reject donor demands and potentially forego funding. In fact, NGOs may be more assertive about managing their institutional environments than is often expected on the basis of a resource dependency assumption. Apart from exit, voice and loyalty, NGOs can voluntarily and deliberately adjust their activities in response to changing donor objectives (Abouassi and Trent, 2016, p. 285).

Ebrahim (2005, p. 82) stated that accountability is:

Better viewed as a system of multidirectional and contingent relations than as a collection of independent binary links. [...] Improving accountability is not only about accounting for donor funds but also about making progress toward a mission that reflects accountability to communities.

This is a complex effort. Kramarz and Park (2016) found a paradox in Global Environmental Governance, revealing complex accountability mechanisms in response to demands for environmentally effective, democratically responsive governance, but the environment continues to deteriorate. Kramarz and Park distinguish between “first-tier” accountability (design of the governance institution) and “second-tier” accountability (implementation of interventions). Although the first addresses goals, actors and accountability fora, the second tier focuses on means, monitoring and evaluation. Accountability can only be meaningful for action if applied to both tiers, which are intrinsically linked (Kramarz and Park, 2016, p. 8). The hybridity of CBSEs and their interventions (see the Introduction) reveals that they blur the boundaries between public, private and voluntary accountability. These “domains” represent different, sometimes conflicting motivations and procedures for accountability, complicating the implementation of accountability mechanisms.

In the context of community-based organisations, accountability is interwoven with the concept of representation. In her seminal work, Pitkin (1967) identified formalistic, descriptive, symbolic and substantive representation. In brief, these types refer to the extent to which elected agents speak for, stand for, resemble or act for the people they represent, i.e. “acting in the interest of the represented, in a manner responsive to them” (Pitkin, 1967, p. 209). Michael Saward (2010, p. 10) has criticised this work for its “unfortunate tendency to take the represented as having a clear, readily accessible and largely stable set of interests.” Instead, he defines representation as a series of events and “a process of claim-making rather than a fact established by institutional election” (Saward, 2010, p. 44). Saward sees democratic representation as a communicative practice that negotiates representative claims

in various patterns. Generally speaking, a representative claim consists of elements in a circular relation: A maker of representations (M) puts forward a subject (S) that stands for an object (O), which is related to a referent (R) and is offered to an audience (A) (Saward, 2010, p. 36). The audience (A) not only refers to the constituency, i.e. the group that is considered to be represented by the maker (M) but also other actors (e.g. governments) that accept, reject or otherwise engage with the representative claim. In other words, the audience usually consists of various actors with different interests.

In a study of work integrated social enterprises, Bradford *et al.* (2018) found that accountability is largely influenced by dominant stakeholders, such as important customers and funding organisations, which may have strict procedures for reports on outputs and impacts. Formal accountability was often directed to such stakeholders, whereas more informal types of accountability were applied to less powerful stakeholders. Other research has also shown that informal accountability is shaped by staff members' individual and interpersonal values and actions, which are more discretionary and complicated and less transparent and studied than formal accountability interactions (Abouassi and Trent, 2016, p. 285; see also Romzek *et al.*, 2012).

Connolly and Kelly (2011) developed a framework to explore how accountability within SEs is constructed and discharged. The framework distinguishes between three basic forms. Although legal accountability refers to implementing internal controls and complying with regulatory reporting obligations, constructive accountability is driven by moral, competitive or market expectations. It may apply outcome and performance reporting and may involve "best practices" or setting standards arising from shifting societal values or political trends (Connolly and Kelly, 2011, p. 233). This helps SEs achieve legitimacy. Finally, voluntary accountability can involve "mechanisms to enable continuous improvement through training, self-evaluation and learning, perhaps arising from social audits and metrics such as social return on investment (SROI)" (Connolly and Kelly, 2011, p. 234). Although Connolly and Kelly (2011) consider constructive accountability as mostly reactive in nature, voluntary accountability is deemed to be more proactive. This latter observation is in line with a study of Buckley *et al.* (2017, p. 14) who concluded that:

Community businesses did not usually see community accountability as a distinct and separate activity [...] rather it was embedded in their way of working [...]. This included both formal and informal methods; required and proactive activity.

Hence, accountability in the context of CBSEs appears to include both reactive and proactive elements, connected to various methods and an array of potential stakeholders.

This observation on the plural (and unspecified) nature of accountability has profound consequences for the organisational performance of CBSEs. According to Koppell (2005, p. 95), organisations may attempt to be accountable in the wrong sense, or, "perhaps worse, try to be accountable in every sense. Organisations trying to meet conflicting expectations are likely to be dysfunctional, pleasing no one while trying to please everyone." Koppell defines this as the problem of multiple accountabilities disorder. He offers five key dimensions of accountability – transparency, liability, controllability, responsibility and responsiveness – of which the last dimension (responsiveness) reflects CBSEs' mission to respond to local needs. The question is then how CBSEs deal with various conflicting needs and accountability expectations, and how the choices they make affect their organisation.

### Data, approach and methods

The data used in this study was collected by the authors in the context of an externally commissioned research project. The authors were asked to review national and local policy



parameters, to review sources and levels of technical and financial support for CBSEs, to analyse practices of impact monitoring, representation and accountability and to draw out more general conclusions about the development of the CBSE sector in England, Sweden and The Netherlands (–Bailey *et al.*, 2018). Considering that CBSEs are a relatively new, highly context-embedded phenomenon and a requested exploratory approach directed by a “how” question (Yin, 2012), we adopted a qualitative case study approach.

The selection of initiatives (see Table I) is not a random sample, but consists of case studies that generally reflect CBSE practice across the countries in terms of location, age, size, objectives and relationship to local communities. The choice of case studies was done in consultation with the advisory organisations partnering in the study, taking into account existing contacts with CBSEs and their willingness to participate in our study (Bailey *et al.*, 2018). Therefore, we make no claims about similar initiatives outside the experiment or the representativeness of the case studies for other initiatives.

Using a mixed-method case study approach, we have conducted semi-structured interviews, on-site observations and document analysis. In this paper, the data is used from the in-depth interviews with initiators, board members, main entrepreneurs and volunteers in the CBSEs, as well as staff members of support organisations and state agencies. We visited the research sites multiple times. In total, 55 interviews were conducted in three countries (22 in England, 13 in The Netherlands and 20 in Sweden) in the premises of CBSEs. We used a semistructured interview guide with open-ended questions regarding the CBSEs’ objectives, organisational structure and networks, management, business model, representation and accountability and monitoring. The interviews lasted between one and two hours, were recorded and afterwards transcribed verbatim for content analysis.

We conducted a thematic analysis of the transcripts, based on a grounded, iterative approach suggested by Miles and Huberman (1994). In this approach, several related themes of interest emerged in the context of the externally commissioned study and these were subsequently refined through the theoretical framework presented above. These themes are:

- “community”, representation and legitimacy;
- dealing with formal requirements;
- informal practices, monitoring and impact measurement;
- questioning externally expected accountability; and
- leadership, board membership and accountability.

Subsequently, we coded texts in the transcripts which corresponded to these themes. Finally, we analysed connections between emergent themes. The analysis of the transcripts does not imply any claim of “authenticity” or “verificational realism” (Crang, 2002; Yin, 2012), but is able to unearth common and different experiences among the interview respondents. To safeguard their anonymity, respondents are denoted by their role in the CBSE only, leaving out references to specific CBSEs and locations (Table I). During the thematic analysis, we found that the interviews with CBSE employees, Chairs and other board members contained the most useful information on accountability. In the next section, the results are discussed.

### Results of the interviews

#### *“Community”, representation and legitimacy*

The social responsibilities of CBSEs lie in catering for the interests of their communities, based on “the principal assumption that community exists in a coherent form that has the power to demand accountability” (Di Domenico *et al.*, 2009, p. 988). However, the interviews

Case study	Legal Structure	Core values and aims	Trading activities	Non-trading activities	Key partners and funders
Goodwin Trust, Thornton estate, Hull, England Start date: 1995	Company limited by guarantee and charity, Goodwin Community Trading Ltd, Goodwin Community Housing Ltd.	To develop the community and to reduce deprivation through the acquisition of assets to deliver high-quality services to meet community needs	Family services: nursery, child care, youth provision meeting spaces, food bank, arts and training. Construction of 41 affordable homes and management of 50 others	Almost all activities are self-funding or grant funded, often a combination of trading and non-trading	Hull city council, EU funding, Arts Council, contracts from a variety of agencies, Homes and Communities Agency
Millfields Trust, Stonehouse, Plymouth, England Start date: 1998	Company limited by guarantee, community interest company, separate charity. Open membership for anyone over 18 living in the area	To promote regeneration of the Stonehouse area, provision of work spaces and employment and encouraging children to raise their aspirations	More than 90 business tenants employing about 300 people, other land and buildings, a pub	A charity, Millfields Inspired, funded by the Trust to widen the horizons of primary school children	Plymouth city council, Local Enterprise Partnership, ERDF
OrganicLea, Waltham Forest, London, England Start date: 2001	Workers' cooperative registered with cooperatives UK, company limited by guarantee	To produce and distribute food and plants locally and inspire/support others to take action towards a sustainable society	Growing and selling many varieties of vegetables, fruit, honey and wine, veg box schemes, market stalls, sales to restaurants	Supporting and training volunteers, some with learning difficulties	Esme Fairbairn Trust, Power to Change, local authorities, Big Lottery's Making Local Food Work program
Stichting Bewoners-bedrijven Zaanstad, The Netherlands Start date: 2013	Foundation (stichting) with an ANBI-status, i.e. an "institution working for a public benefit."	To improve local economy, employment, "liveability," in Poelenburg and other neighbourhoods. Mission: "working on employment, the neighbourhood and working on each other"	Renting out meeting space from the neighbourhood centre (until May 2017), acting as subcontractor in "social neighbourhood teams," and commissioned renovation works	Resident coaches, providing work experience positions, collecting bulky garbage, managing a neighbourhood garden and sports activities in the Poelenburg neighbourhood	Local government of Zaanadam, local housing associations Rochdale and Parteeon, Dock foundation (care), Doen foundation (funding) and others

*(continued)*

**Table I.**  
A Brief overview of the case studies

Case study	Legal Structure	Core values and aims	Trading activities	Non-trading activities	Key partners and funders
Bewonersbedrijf Malburgen, Arnhem, The Netherlands Start date: 2013	Foundation (stichting) with an ANBI-status, i.e. an "institution working for a public benefit."	Provision of affordable housing to low-income people with very different backgrounds; offer a meeting place for local residents; opportunities for education and job training; enable residents to develop themselves	Renting out 130 units (primarily rooms, but also meeting rooms and office spaces) from a renovated former care home	Tenants are expected to volunteer in Malburgen neighbourhood and also support social activities. BEM accommodates self-employed people to offer recreational activities, physical exercise, do-it-yourself or other activities	The housing association Volkshuisvesting, Philadelphia (care), and the 'social neighbourhood teams' of the local government
Bewonersbedrijf Crabbehoef, Dordrecht, The Netherlands Start date: 2014	Foundation (stichting) with an ANBI-status, i.e. an "institution working for a public benefit."	Offering a multifunctional meeting place for local residents, volunteer opportunities, to gain working experience, to transfer knowledge and to develop budding talents and entrepreneurship	Renting out a conference room, lunchroom with garden terrace and an atelier, catering services (using garden crops) and targeting fundraising	The BBC hosts sewing ateliers, workshops, read sessions, workshops and playful biology lessons for children. It has a small library and an Internet café. Volunteers helping in the garden can bring home free crops	Local government, MEE (care organisation), local housing association, Doen foundation (funding) and others
Yalla Trappan, Rosengård, Malmö, Sweden Start date: 2010	Nonprofit, women's cooperative. Open for general membership	Principle of "one member, one vote" Empowering immigrant women that are far away of the job market	Café, Catering, hand crafted food (marmalade, spices, etc.). Study visits, sewing and design studio, Cleaning and conference service. On-site job training	Empowering immigrant women through, e.g. language training, learning about Swedish society, legal matters, enterprise experience and knowledge of how to run a business	Members of the Malmö City Council, IKEA, and the Employment Service Agency

*(continued)*

Case study	Legal Structure	Core values and aims	Trading activities	Non-trading activities	Key partners and funders
Nya Folkets Hus Rågsved, Stockholm, Sweden Start date: 2007	Nonprofit member driven by local organisations and associations. NRFH has additional legal structures, e.g. the limited company Foundation	NFRH aims to be an actor that follows and initiates social change. Provides local meeting space for democratic meetings and other activities	Renting out meeting space, arranging business conferences, café and catering, second-hand shop, on-site job training	Giving space and advising on how to organise citizen initiatives. Provide cultural experiences, such as art exhibitions, theatre plays for children and music workshop. Help children with homework. Annual Christmas supper	Member organisations, Local city council, the Employment Service Agency, Stockholm's Business Regions Development, and local real estate owners
Roslagskrafterna, Norrtälje, Sweden Start date: 2014	Economic association, workers' cooperative	To build a work place that suits clients through a cooperative social enterprise Provide on-site job training and engaging in local charity	Second-hand shop, repair café, multiservices, job training, two cafés	Offering experience and knowledge of how to run a business	Members, Companion, Municipality council, Recycling company, Employment Service Agency

Table I.

clearly show that, in the view of our respondents, there is neither a coherent community nor an identifiable community demand for accountability in the case studies. Instead, many respondents “define” the community in terms of local needs which need to be addressed by providing specific goods or services, regardless of whether these were formerly offered by government or welfare agencies. All case study CBSEs claim to know well what local residents need and that catering for these needs is a key source of legitimacy for their existence and performance.

This approach towards accountability and legitimacy obviously affects the matter of representation. Although CBSE respondents claim that they act for their target communities by addressing their needs, none of them stated that their organisation formally represents the locality in which they are based. CBSEs are aware that the informal processes they use for community engagement (see further on) are often considered by policymakers to “lack legitimacy because those who participate are neither considered as representative of, nor democratically accountable to, the whole population” (Gilchrist, 2016, p. 15). In an attempt to avoid the traditional challenges of representativeness, in particular draining discussions with civil servants, CBSEs position themselves as (groups of) experts with local knowledge, (Richardson and Durose, 2013, p. 30). Several board members claimed that the legitimacy of their efforts is rooted in such local knowledge, through their own networks, local connectivity and governance structures:

You have to live here to be on the board [. . .]. It’s stability. Our Chair was born on the estate. Our board members are all recognisable to each other and we don’t have lawyers or other professionals to whom they would immediately defer. (Director)

Using Saward’s perspective, the claims made by CBSEs can be considered as “representative claims”, except for the fact that they do not want the audience (beyond the CBSEs’ target communities) to consider them as formal representatives. In other words, all applied accountability strategies serve as a form of representation except for a dismissal of any recognition of the CBSE as a formal representative. Nevertheless, other organisations might still identify or treat CBSEs as representatives of the local community. In a few cases, this has resulted in contractual relations with the local authority, in which CBSEs are commissioned to deliver certain services as a result of being “close to the community”.

Another aspect strengthening the legitimacy of CBSEs but which at the same time makes accountability a highly complex affair, is their platform function. We observed that several cases are attempting to better address local needs by facilitating and connecting local initiatives to make a stronger impact (Buckley *et al.*, 2017). Even if they do not issue a representative claim as described by Saward (2010), the implicit message to the audience beyond the CBSEs’ constituency is that these CBSEs matter for addressing local needs, as is exemplified by the following quote:

If you look at our CBSE, you can see that we have become a co-operation of various resident initiatives. Every time, we take responsibility to tie these projects to another, which enables us to do many things in the neighbourhood [. . .]. I think the main strength lies within the connections between everything and everyone [. . .]. As a result, the local authorities increasingly recognise that we have become important, a very important local player. (Board member)

Finally, the differences in understanding “community” not only appear between actors on local level, but also between the three countries. The English and Dutch case studies place a strong emphasis on engaging with and providing benefits for local residents. In England, CBSEs are often initiated in areas with a long history of resident involvement in previous community or neighbourhood-based programmes. Dutch CBSEs often arise in target neighbourhoods of the recently ended national urban renewal policy (Bailey *et al.*, 2018). In

Sweden, “societal entrepreneurship” includes the notions of “community”, “community-based” and “local” (Persson and Hafen, 2014; Gawell *et al.*, 2014). However, these notions are only emphasised in terms of settings in rural regions. In our case studies, which are based in Stockholm and Malmö, the local urban neighbourhood is not emphasised by our respondents even though the cases are contingent on their local context and have social aims for the community.

### *Dealing with formal requirements*

All CBSEs produce annually audited accounts and reports to satisfy the formal accountability requirements of their legal status, as a company limited by guarantee (England), non-profit and economic association (Sweden) or foundation (The Netherlands) as well as regular reports to funding bodies. This clearly reflects the notion of legal accountability as framed by Connolly and Kelly (2011). However, the interviews also revealed that some of the requirements associated with the CBSEs’ legal status are not always met. The Dutch CBSEs, for example, have the foundation (stichting) as the legal basis. This type of organisation obliges boards to establish by-laws (statuten), which include arrangements regarding community accountability. Formally, the by-laws require CBSEs to have meetings with residents to discuss the CBSE’s objectives, activities and performance. However, this is a bridge too far in all (Dutch) case studies:

Then you indeed need to organise residents’ meetings in which you give an account of your activities and plans, but hey, people in our neighbourhood are not interested in this at all! What we do, if we have resident meetings with a specific theme, then we include this accounting into the meeting, but as a very small part. In our newspapers and other publications, we are accountable as well, but to be honest, if you read what our by-laws say about how we should formally be accountable, we are not doing that. (Chair)

This finding of a lacking interest in specific efforts to account is in line with previous research on nonprofit organisations (NPOs). In fact, project level outcomes for which NPOs can be held accountable “are typically so narrow that the public has no compelling accountability interest, e.g. training a dozen women in home business skills” (Campbell, 2002, p. 245).

In their efforts to meet formal accountability requirements from funding agencies, some CBSEs go a long way to show their public value beyond narrow, pre-defined criteria imposed by funding agencies. In a Swedish case, the Chair explained that the local authority used to only provide grants based on the number of hours that the community centre (which is run by the CBSE) booked for activities. In response, this CBSE increased the level of detail in their reports, to exhibit all CBSE activities and collaboration with other actors which are not reflected by the room bookings. According to the Chair, this has resulted a larger understanding of the overall activities in the community centre.

In other cases, differing accountability demands associated with funding from large (national) funding associations have actually prevented CBSEs from applying for grants, as explained by one of the Dutch respondents:

For every national fund, we have to submit a different format. All of them have different monitoring and reporting requirements. Why don’t these national funds [Orange Fund, Doen Foundation and VSB Fund] streamline their requirements to make our job easier? Now we have to plough through a mass of documents, and every time they ask for something slightly different. And each of them also wants us to structure our yearly reports in different ways. (Board member)

Hence, the message is that even when grants are readily available for CBSEs, the associated accountability requirements may actually result in the decision not to apply for these grants

at all, because CBSEs lack the time and staff capacity to deal with these requirements. This shows how CBSEs attempt to avoid “multiple accountabilities disorder” (Koppell, 2005), by not engaging with conflicting accountability expectations that negatively affect performance.

### *Informal practices, monitoring and impact measurement*

In its basic form, accountability is a relationship between an actor and a forum, in which the actor has an obligation to explain and to justify his/her conduct to a forum which can pass judgement (Bovens, 2007). The previous subsections have shown that CBSEs are accountable to multiple fora with different sets of criteria, creating a “problem of many eyes” (Bovens, 2007, p. 455). With CBSEs operating on strict resource constraints, focussing on a variety of stakeholders can be problematic (Bradford *et al.*, 2018, p. 160; see also Koppell, 2005). Formal practices of accountability by CBSEs are usually limited to specific actors (such as funding agencies) and specific actions, e.g. audited accounts to tax authorities.

In our nine cases, accountability is predominantly shaped through a range of informal, day-to-day practices, some of which will be discussed below. The interviews have shown that this is the result of a relational approach towards accountability. CBSEs’ mission statements require them to be responsive towards constantly changing needs and interests of local target groups and stakeholders and to continuously decide on appropriate actions and steps forward (Ebrahim, 2005, 2010; Painter-Morland, 2006; Buckley *et al.*, 2017). The previous subsection showed an example of how to integrate accountability into meetings with residents in a low-key way. Other examples of informal accountability are coffee mornings, door-to-door consultation, community audits, workshops and feedback collected by volunteers during various activities offered by CBSEs. This reflects a wider trend among all case study CBSEs, who are experimenting with new forms of participatory democracy while conducting their core activities.

However, many CBSE representatives reported that it is hard to keep up with dialectical activity and constant informal dialogue between CBSEs, target group and other stakeholders, let alone through formal accountability methods. As most CBSEs are predominantly run by volunteers, several chairs reported that their organisations lack the time, expert knowledge, staff capacity or other resources to be accountable in ways which are assumed or prescribed by bureaucratic actors. This particularly applies to CBSEs that conduct (semi-)commercial activities to raise financial resources in support of their social objectives.

Similarly, monitoring and impact measurement are often not conducted formally and systematically. Although respondents generally agree with the necessity to reveal CBSE impact, they perceive major difficulties such as the lack of commonly agreed methodologies, the issue of “additionality” if working with other stakeholders, the question of when to measure if the project is continuing, and the factor that objectives might change. Instead, several CBSEs measure outputs in practical, low-key ways that are embedded in daily routines. Take for example, the monitoring of activities of one of the Dutch CBSEs:

John and Frank are our full-time caretakers, who know it when problems arise. We [board members] consult them on a daily basis and we exchange during morning coffee meetings how the business is running, how things are going on and why (not). We have not established any procedures for this. In that sense, we are not researchers who systematically record as much as possible. That is not to say that we should record everything. (Main entrepreneur)

Previous research has shown that formally established measuring tools, such as social cost-benefit analysis or SROI have been criticised as “being both too arbitrary for officials to find

useful and too difficult for community projects to use” (Gilchrist, 2016, p. 35). Two respondents also observe that a more hands-on practice of getting feedback or showing impact works for their CBSE:

We have actually stopped trying to really measure impact. We have tried many different methods, social accounting and SROI. We get constant feedback from residents. If we're not doing it [asking feedback], we're hearing about it from the residents. We use a community auditing technique and go out every 2-3 years to ask. We're in the midst of a neighbourhood planning exercise which is an interesting experiment. We took the lead. We thought it would take 6 months but maybe it needs 3 years. (Director)

I am fully aware of the availability of all kinds of tools to measure societal value and I like that. And yet, we do not use these tools. I am really concerned with, let me just call it, showing the perception. We always try to show as much as possible what we do in daily life and practice here [...]. What we are considering for next year is to issue a booklet portraying a number of people who tell what the CBSE means for them, and if you read that, you just know enough [...]. Just telling the stories behind the activities and the people. (Chairman)

In one of the Swedish CBSEs, the Chair of the board also acknowledged the problem of formally measuring impact, but emphasised the need for government support on this matter. Another potential drawback of (costly and time-consuming) formal assessment methods is that they can lead to organisations which prioritise “analysis over action,” in an effort to fulfil top-down imposed accountability requirements (Connolly and Kelly, 2011, p. 230; Abouassi and Trent, 2016). This may be counter-productive for not-for-profit organisations which gain their legitimacy by “doing” (Connolly and Kelly, 2011, p. 230; Abouassi and Trent, 2016). However, it appears that our case study CBSEs rarely get to the point where the balance of activities is tilted towards “analysis” and accounting.

#### *Questioning externally expected accountability*

The finding that CBSEs generally refrain from formal assessment and evaluation approaches is often linked with a strong commitment to marketing themselves to the “outer world.” Interviewees have emphasised the importance of telling their story, being transparent and communicating their aims and activities, to their target groups, but also beyond. All case studies rely predominantly on traditional methods of communication: newsletters, annual reports, websites, items in local newspapers and themed public meetings (Bradford *et al.*, 2018). Most CBSEs use social media to advertise their activities or special events. For many interview respondents, being accountable and transparent is often linked to promotion and marketing – stressing how the CBSE is stable, reliable and has a good track record and therefore helps generate support from larger, state agencies.

Some interviewees have described this as public relations, image management and informing rather than accounting. However, others have clearly expressed how publicity, in particular the website and social media, play a crucial accountability role in accountability in projecting a positive image to all stakeholders – residents, funders and others – as a mechanism to further the CBSE’s aims (Buckley *et al.*, 2017). This is a clear example of the transparency dimension of accountability (Koppell, 2005).

R: Putting reports and accounting online, of course we do, even though I doubt whether anyone will read it [...]. I think this is decent towards people who want to support us, that we are transparent on this matter. I hope this will evoke trust, maybe we have made mistakes, but that we, in any case, do our best to deliver everything in neat, responsible and decent way.

Interviewer: So that you in fact [...]



R: Are accountable to the public. I think that the website, it may not be of much use for local residents, but I keep in my head that sponsors or other people who want to co-operate with us, that they may have a look at the website, that is what I would do. Then it is your business card, how you come across. (Board member)

However, there are also critical remarks regarding external accountability by CBSEs. Many interviewees have argued that precisely because they provide locally needed services, driven by altruistic motives, they question externally imposed expectations or requirements to provide further justification for what they are doing (Nicholls, 2009). This is in line with Buckley *et al.* (2017, p. 7) who found that “the term community accountability did not resonate with the 12 community businesses or reflect what they felt was a value-based way of working”. They conclude that:

Community accountability might be understood as the ways in which community businesses are embedded in their communities, engage local people in the business and respond to the needs of their communities – be they hyperlocal, neighbourhood or a community of identity (Buckley *et al.*, 2017).

This is a clear reflection of the responsiveness dimension of accountability (Koppell, 2005).

Although the previous interview quotes show an inclination to reach out to professional stakeholders, one CBSE prefers to minimise any form of dependence on and accountability to local institutions and professionals, but also residents:

To anyone who wants to hear it, we tell our story. There is a neighbourhood newspaper, we have bought two pages in every issue, in which we explain what we do and how. But I don't consider that as accounting, that's just informing. If I am obliged to account to you, that will be legally established in advance. What really gets my goat if someone starts meddling with our policy and operational management. Strangely, civil servants expect CBSEs to allow them to do exactly this. We are a foundation, and that is no coincidence. By definition, an association with members creates a load of havoc. If you have one member that can organise resistance, a “trade union leader,” then you are lost. With an annual turnover of almost €700,000 we simply cannot take the risk. (Main entrepreneur)

This position, which emphasises the desire for independence of the business, is on the one hand at odds with definitions of CBSEs as suggested in the literature. Although informing local residents is a clear strategy and adopted as such, this CBSE neither considers this as being accountable nor accepts any attempt from professionals or residents outside the board to affect the running of the business. This is probably an exception. The other Dutch and English cases show that assets, loans and attractive leases (of buildings) can only be accessed by direct engagement with the local authority. In fact, one English CBSE has a city councillor on its board who is responsible for developing social enterprise for the city council. In such cases, the boundary between representative and participatory democracy is becoming fuzzy. On the contrary, the above quote exemplifies an initiative that manages its institutional environment and resources more assertively than its comparative lack of power might suggest (Abouassi and Trent, 2016, p. 288).

#### *Leadership, board membership and accountability*

According to their general definition, CBSEs are managed by community members, implying leadership by community members. Although the literature attaches importance to community leadership (Selsky and Smith, 1994) that is structured democratically, our case studies reveal practices of leadership exhibited by charismatic individuals who propagate the core values, motivate volunteers and make the majority of the decisions. Chairs (Sweden) and chief executives (England) operate within flexible management

structures and wider networks through which they can build coalitions with other actors with “the added benefit of helping residents engage with and mainstream social and economic activity” (Coatham and Martinali, 2010, p. 98). These leaders are often, but not exclusively, the initiators, or board members who were involved in the start-up of the business. In The Netherlands, leadership of the CBSE is sometimes provided by the chair, in other cases by an entrepreneur (zakelijk leider) who might be an unpaid volunteer. Between case studies, there are substantial differences in whether board members are democratically elected or otherwise appointed. This obviously affects both internal and external accountability:

We're a democratic organisation so we've got a board drawn from the local community, the city council and businesses: seven residents, two councillors and two businesses. Anyone aged over 17 living in Stonehouse can join the trust. Any member can stand for election to the board. We have an annual general meeting in November and an annual election from the membership. It's not easy to get new members, we've got a couple of vacancies. (Director)

This quote also demonstrates a key problem in CBSE management. Case studies in all three countries reported difficulties in filling board vacancies (Spear *et al.*, 2009). All appear to lack a succession strategy to ensure a steady turnover of board members. Elections rarely occur because few if any CBSEs have multiple candidates for board vacancies. Instead, board members are often recruited because of their skills (professionals), local knowledge or extensive networks (residents) rather than simply being resident in the neighbourhood. Experienced volunteers appear to be a good source of recruits for board membership. As one Chair notes, often the best outcome is to recruit board members who have specific skills but also strong connections to the locality:

When I decided to take on the Chair position [and restart the organisation after a previous bankruptcy], it was like, we cannot have representations of members from local political associations. No reporting back and no engagement in this organisation. So we reappointed the ones [from the previous board] that were really committed, but also key persons based on competence, skills and different backgrounds. Yet, many of us that come from this area, so we are grounded in the local associations that exist here, all of us. (Chair)

Unlike the Dutch cases, which are foundations that formally have no members, all Swedish and two of the English case studies are member-driven organisations. Both the members and the representatives of the board can be considered to be part of the target community of the CBSE. The democratic principle of “one member one vote” is at the centre of the decision process which may also slow down the decision-making. One of the English CBSEs, which takes the form of a workers' cooperative, has been reviewing its management structure to get a good working balance between leadership by a few and active involvement of all co-operative members, thus strengthening internal accountability:

I'm a director of the company out of 15 co-op members and now a smaller hub of directors. We're reviewing this and have to decide who will become directors. There were issues about the hub of directors making too many decisions. We're trying to devolve down to the team level. We are shifting back to all members having decision-making powers, not just directors. The 15 includes anyone with a paid contract. (Director)

Two of the Swedish CBSEs, also workers' co-operatives, faced the delicate problem that the working members of the co-operative were not allowed by legal requirements to be part of the board because they were on social benefits when setting up the co-operative. One of these CBSEs dealt with this by establishing an “extended” board consisting of these working members. This extended board has a weekly meeting where they meet and discuss

different issues, thus ensuring internal accountability. The other Swedish CBSEs arranged for the working members to be appointed as co-opted members, to ensure working member input while being on social benefits.

### Discussion and conclusions

In the context of growing citizen initiatives, CBSEs are a particular entrepreneurial form of active citizenship. This particular form of community self-organisation responds to austerity regimes and policy reforms by providing services, jobs and other benefits for residents in deprived communities, thus contributing to neighbourhood regeneration (Somerville and McElwee, 2011; Bailey, 2012; Healey, 2015; Kleinhans, 2017). CBSEs are owned and managed by community members and are locally accountable in many ways. This paper has discussed how CBSEs perceive accountability and representation, how they apply it and why different practices are adopted. Data from a qualitative, explorative study of nine CBSEs across three countries was used.

Although “accountability is one of those golden concepts that no one can be against” (Bovens, 2007, p. 448; Koppell, 2005, p. 94), this concept and the notion of representation are difficult to grasp in CBSE practice for many reasons. First, CBSEs use different definitions of “community”, such as users/beneficiaries (Sweden) or residents of a defined area (UK), whereas others define it as anyone coming into contact with the CBSE (The Netherlands). However, CBSEs commonly define community in terms of local needs, whether or not in deprived areas, which must be addressed by providing specific goods and services. This approach provides legitimacy in different ways compared to state agencies and other institutions. Legitimacy of CBSEs is also grounded in perceptions of public value (Healey, 2015, p. 22) and in CBSEs’ presence in local areas, acting as champions and facilitators of community initiatives and having residents in their governing boards (Coatham and Martinali, 2010, p. 98). At the same time, although CBSEs act for their target community through substantive representation (acting for people), they deliberately refrain from formalist representation (speaking for people) of the locality in which they are based (Pitkin, 1967). From the perspective of Saward (2010), we conclude that CBSEs make partially representative claims, with the exception that they do not want the audience (beyond CBSEs’ target communities) to consider them as formal representatives.

The reason behind the dismissal of formal representation is, amongst others, connected to the second complexity of accountability in the context of CBSEs. Co-operation with multiple stakeholders confronts them with the “problem of many eyes” – being accountable to different forums with different sets of criteria (Bovens, 2007, p. 455). With several CBSE also functioning as platforms for (other) bottom-up initiatives, local residents appear on both sides of the “accountability equation”, as account givers and account holders (Damgaard and Lewis, 2014, p. 265). Strictly distinguishing between these categories may be impossible. In an effort to serve “the many eyes” and to prevent “multiple accountabilities disorder” (Koppell, 2005), CBSEs both produce annually audited accounts and reports and apply a wide range of informal, internal and external methods (website, newsletters, public meetings, social media and storytelling). CBSEs thus publicise and evaluate what they do, with different methods being appropriate for different circumstances and different audiences.

Third, the needs of target communities, the associated CBSE aims and co-operation with stakeholders develop over time. Hence, the “problem of many eyes” is juxtaposed to the problem of “moving targets”. In line with other research, we found that CBSEs’ missions require them to be responsive to changing needs and interests and adapt their decisions and strategies accordingly (Ebrahim, 2005, 2010; Painter-Morland, 2006; Buckley *et al.*, 2017). In

fact, CBSEs are more accountable to this process than to any particular constituent or outcome. With limited time, money, expert knowledge and (volunteer) staff capacity, flexible applications of accountability are a pragmatic way in which CBSEs can continue adapting to their changing environment, to survive and flourish (Abouassi and Trent, 2016). This “adaptive accountability” requires a relational, dialectic approach in which formal, costly accountability methods are only applied to legally required forms of accounting and informal practices are accepted by funding agencies and local governments as valid forms of accountability. The same applies to practices in which CBSEs “measure” outputs and impact in practical, low-key ways that are embedded in daily routines.

Finally, “adaptive accountability” appears in leadership. Although CBSEs are assumed to have democratic governance structures, we have found that board members are often recruited because of their skills, local knowledge or extensive networks (with residents) or personal motivation (Spear *et al.*, 2009). CBSEs are therefore often skills driven rather than democratic representative driven and may fundamentally question the perceived need for board members to be democratically elected. In such cases, representation of the CBSE is “secured” through strong local knowledge and networks rather than elections.

In conclusion, we have shown that CBSEs practice “adaptive accountability” in varying, mostly informal ways which reflect pragmatism and continuous responsiveness to changing needs, circumstances and stakeholders and which provides legitimacy. Using the literature on accountability and Saward (2010) concept of the representative claim, this paper contributes to the literature by revealing how accountability, representation and legitimacy are continuously negotiated as part of an ongoing dialogue between the CBSE, its target communities and other stakeholders such as funders or government in all its forms. This study has shown that CBSEs struggle with shaping accountability in its various guises. Many CBSE interviewees argued that precisely because they altruistically provide locally needed services (which may have been disbanded by government, market or welfare agencies), they question frequently imposed external expectations to provide justification for what they are doing, beyond usual legal obligations related to funding or annual accounting and reporting. Moreover, accountability is often part of a marketing strategy to promote the expansion of the CBSE. This shows that both CBSEs and external stakeholders need to reconsider their definitions and operationalisation of accountability.

Building on the social enterprise framework proposed by Connolly and Kelly (2011), we argue that adaptive accountability consists of a mix of legal, constructive and voluntary accountability, including both reactive and proactive elements, connected to a range of accounting and representation methods and targeting a large array of potential stakeholders. As soon as CBSEs can effectively navigate all (legally) required forms of accountability, they need to develop mechanisms to “enable continuous improvement through training, self-evaluation and learning” (Connolly and Kelly, 2011, p. 234). In the words of Ebrahim (2005, p. 61), the challenge is “finding a balance between short-term, rule-oriented mechanisms of accountability and more long-term approaches to evaluation and organisational learning.” This is consistent with the argument for alignment of “first-tier” accountability (design of the institution) and “second-tier” accountability, i.e. mechanisms for accountability (Kramarz and Park, 2016). The latter needs to match the design and management of CBSEs.

We also conclude that adaptive accountability is reflected by how case study CBSEs purposively mix forms of representative democracy (e.g. board member election) with forms of participatory or deliberative democracy, by both engaging with local government decision-making and experimenting with new forms of participatory democracy. Because CBSEs are by nature hardly ever fully independent from other actors, the discussion should

focus on public interest and public value produced by CBSEs, in line with principles of deliberative democracy (Mulgan, 2000, p. 569, see also Buckley *et al.*, 2017; Williams and Taylor, 2013). This matter is important in the context of increasingly fuzzy boundaries between various forms of democracy and associated issues of representation. If governments, welfare organisations and other actors consider CBSEs as an innovative form of co-produced public service delivery responding to social needs (Van Meerkerk *et al.*, 2013; Wagenaar and Van der Heijden, 2015; Kleinhans, 2017), a more constructive approach, also towards accountability, is necessary. Effective and sustainable co-production is “not only a question of citizens assuming greater responsibilities for the provision of welfare services, but also granting them greater rights in designing, commissioning, delivering and evaluating them” (Pestoff, 2014, p. 398).

There are, of course, limitations to this study. Considering that CBSEs are a relatively new, context-embedded phenomenon, an exploratory study design was appropriate here but this limits the external validity. In terms of future research, evaluating additional examples from Sweden, England, Netherlands, but also other European countries will help to build a wider understanding of CBSE practice in general and accountability in particular.

Secondly, “adaptive accountability” may have clear temporal dimensions. A nascent CBSE has to establish its presence and convince stakeholders, including the community, that it delivers benefits and therefore justifies support. Once this has achieved, it can build its reputation by publicising its services. As time passes, the CBSE may need to reaffirm its commitment to what it is and what it does by reaffirming (or adjusting) its core values (“first-tier accountability”) and seeking renewed support from stakeholders, using various accountability methods – public meetings, elections, etc. (“second-tier accountability”). Future research might uncover how “adaptive accountability” unfolds across different stages of CBSE development.

Finally, the limited body of empirical research on CBSEs in Europe leaves scientists, policymakers and citizens with open questions regarding impact but also how to “measure” the “public/societal value” produced by CBSEs. Research should both unravel the concept of public value in the context of hybrid civil society and explore how this concept can be effectively incorporated in forms of adaptive accountability beyond narrow, rule-oriented approaches.

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