Dear Editorial Board,

I am glad to see you are considering this issue. It is crucial to the future of academic research. I include below a few basic thoughts about it. To set a context for these thoughts, I should mention that I am currently working on a larger research project with a colleague, Prof. Ulf Strohmayer, at the National University of Ireland in Galway, on precisely this question. Between us we have worked as academics in three different national contexts: the United States, Ireland, and the United Kingdom. Thus we have a range of experiences to draw upon in approaching the subject. What I have to say below draws upon our many fruitful discussions of the issues, but I do not summarize our own research findings here. Rather, these are my own distillations of the key issues.

First, it is necessary to see the rise and increasing invasiveness of audit cultures as a phenomenon of the entrenchment of neo-liberalism in universities. By "neoliberalism" I mean chiefly the imposition of a business model of management (sometimes under the name "New Public Management") upon the academic world in the context of shrinking state support for higher education. In one form or another, this situation applies to many different national contexts. The proliferation and standardization of audit practices is justified within this general context as a way to make sure "the taxpayer" receives "value for money" in publicly funding higher education. The watchword is *accountability*, sometimes also *transparency*. These terms are difficult to object to as aspects of higher education policy, since most academics, too, would agree that it makes some basic sense for the academy to "account for" what it is doing.

However, there are a couple of very important assumptions behind the current craze for auditing. First, it is assumed that previously the accountability of research or teaching was inadequate. As evidence for this, we in the Anglophone world hear endless horror stories about "dead wood," that is, (usually older) colleagues who have spent years or even decades "doing nothing," that is, "merely teaching." There are a number of problems with this representation. Chief among them from my perspective is the underlying "welfare reform" mentality, according to which a few "free riders" or "welfare cheats," individuals who exploit the system, are a totally unacceptable price to pay for whatever benefits may come from academic freedom. This mentality is a child of the 1970s, and needs to be called into question in the most serious way. It remains the case, in my view, that academic freedom and the institutional independence of universities that guarantees it are so centrally important and so precious, that the existence of a few colleagues working less hard than the rest of us is not a disaster, and in fact is a fully and totally acceptable, if not praiseworthy

by-product of intellectual and pedagogical independence. I formulate this as provocatively as possible to highlight just how far we've come from any sort of solidaristic institutional culture in the last two decades.

It also bears remembering that universities have long had functioning forms of quality control, such as academic review and tenure (in the Us and elsewhere), student evaluations of teaching, and so on. Although of course not perfect, these long-standing institutional control systems have had one tremendous advantage over the current audit measures: they are not animated by a feverish urge to "prevent" anything going wrong. This preventive urge, which in any concrete human institution is doomed to perpetual failure anyway, drives an infinitely expandable program of ever-more meticulous auditing. Indeed the "failures" themselves, the inevitable, new and unanticipated problems, serve as fuel for more preventive paperwork. All of this is reinforced by another aspect of the imposed business model, namely the desire of new administrators to "make their mark," which today often means introducing a new software system or organizational structure to increase accountability or "performance."

It is precisely here, however, in its relation to "performance," that the drive for more accountability is the most problematic. To put this as succinctly as possible: the deepest secret of accountability is that, if pushed beyond a certain level, it directly interferes with "performance" in the sense of "output." It is already problematic to assert that increased pressure on academic researchers through audits will increase the quality or quantity of their "outputs" beyond certain inherent limits relating to time and effort. What is more, audit in fact takes time and effort. Yet it is precisely this that is rarely admitted. Whatever else administrators will admit about audit measures, they are extremely reluctant to acknowledge that audit measures require any significant additional time and energy, or that the exercise of filling out audit paperwork is disruptive to academic work. The entire audit culture presupposes that audit itself is basically "cost-free," or that whatever costs it does entail can simply and unproblematically be absorbed by existing staff. This extends not only to the time-budgets of individual academics, but also, more broadly, to the economic costs of the audit infrastructure itself.

In the Uk, where I now work, audit cultures are arguably more advanced than anywhere else in the world. The pace of introduction of, and administrative commitment to, audit is sustained at a fever pitch. As many academics around the world are aware, the Uk has maintained a nationwide Research Assessment Exercise (RAE, now newly dubbed the "Research Excellence Framework" or REF) since the 1990s. As with the last RAE, completed in 2008, the next REF promises to constitute a huge expenditure of time and effort on the part of thousands of academics. Hundreds of thousands, if not millions, of person-hours will

be devoted to planning for, collating, and writing the "submissions" to the Ref by each academic department. At the risk of pointing out something that should be too obvious, these hundreds of thousands of hours will be *hours not spent doing research* (or preparation of teaching). As little as the auditors would like to admit it, academics, just like everyone else, have a limited number of hours to work with in our lives. Quite apart from issues of alienation and the massive withdrawal of professional trust all of this represents, forcing this additional work upon us is a form of exploitation. The cost issue also encompasses the institutional infrastructure for this, the Higher Education Funding Council of England (Hefce; Wales and Scotland have their own versions). These are permanent, staffed bureaucracies housed in buildings, all of which costs a substantial amount of taxpayers' money. But one searches in vain for high-profile studies of the economic costs of maintaining these agencies (or of the QAA, the agency that audits teaching at universities).

The point of this brief and necessarily only suggestive intervention is not to deny the value of some kind of accountability. However, it would be much smarter to approach the issue by asking:

- What systems are already in place, and how well or poorly do they actually work'
- What are the costs and benefits of keeping existing, necessarily imperfect systems, versus replacing them with new, *also necessarily imperfect* systems'
- How can we accomplish an "adequate" level of accountability, a level that avoids cutting into productivity and academic performance, and will not automatically grow and intensify regardless of how useful it is (or is not)?
- How can we ensure that academic freedom and intellectual independence remain the most cherished and protected values in all of this'

The answers to these questions will have to be different from one context to another (and this already indicates one problem with planned standardization). But in any event, based on my own experience in two different national systems of higher education, I would certainly urge resistance to the adoption of anything like the current audit system in the UK. It is clearly detrimental to the efficient use of time for the production of high-quality, carefully considered research. There is a great deal of excellent research being done here, but it

would be a mistake to see this as a result of the current audit culture: it is rather the result of the heroic efforts of thousands of $U\kappa$ academics to do their work despite the audit culture.

I hope this helps.

Best,

Matthew G. Hannah

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