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Private Security's Accountabilities within Polycentric Assemblages

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Abstract

This article will reflect on the multiple ways in which private security can, and is, being held responsible and accountable to the public (and other security providers), in formalised, polycentric or nodal assemblages. Drawing on empirical research conducted on plural policing partnerships, the article will show that private security is influenced by market forces, but that this is part of an interwoven, layered, formal-informal system of accountabilities – most of which are bottom-up and relational, rather than top-down and legislated. In fact, drawing on the work of John Braithwaite, we show that horizontal or circular forms of accountability (or accountabilities) play a large role in aligning the private sector to the public interest or common good within pluralised environments.

Key words: private security, polycentric, nodal, accountability, hybrid, plural policing

Introduction

It is March 2014 in the streets of the central city of Cape Town, South Africa on a busy Thursday morning. In broad daylight and in front of office workers and pedestrians alike, two public police officers and three private security guards assault a naked man – kicking and beating him, after which they bundle him into the back of a police van. The event is filmed by the public and posted on various social media platforms. Later it emerges that the assault went on for at least half an hour (see Knoetze, 2014). The public outcry which followed was immense, with various politicians, police management and security management responding to the incident and assuring that those involved would face the consequences. But it also raised a number of other issues with respect to the nature of oversight and accountability for plural policing; the dividing lines between the types of oversight the public and private sectors each adhere to; and, the relevance and effectiveness of formal oversight mechanisms in the face of increasing plurality of policing – particularly for private security.

We know from scholarly research that private security has multiple accountabilities – both formally and informally (Bayley & Shearing, 2001; Button & George, 2001; Burbidge, 2003, 2005; Stenning, 2000). Assumptions that private security necessarily lacks public accountability and/or is held less accountable than the public police, has largely been challenged. However, in light of the example above, there is still a need to reflect on just how private security accountability happens in context – particularly given the realities of pluralised policing environments. Whereas scholarship has focused on mapping out plural policing networks or security assemblages (Abrahamsen & Williams, 2011; Berndtsson & Stern, 2011; Button & John, 2002; Crawford et al, 2005; Dupont, 2004) a similar mapping of accountability systems within pluralised policing arrangements is less of a focus (there are notable exceptions

such as Ayling, Grabosky & Shearing, 2009; Crawford et al., 2005; Jones, 2003, Stenning, 2009). Where accountability or regulation has been the subject of inquiry there has been a tendency to focus on the broad challenges of inclusive plural policing, the deficits in accountability and the normative aspirations of democratic plural policing (Burbidge, 2003, 2005; Crawford et al, 2005; Dupont, 2004; Hermer et al, 2005; Kempa & Johnston, 2005; Loader, 1997, 2000; Newburn, 2001; Shearing & Wood, 2003; Stenning, 2009; White 2010). Within assemblages of auspices and providers there is the neglected area of how private sector auspices or providers are accountable *within security assemblages*. Furthermore, although much has been written about how regulation occurs in polycentric assemblages, much less has been written on how regulation occurs in polycentric *security* assemblages.

In light of this, the article has a twofold objective. Firstly, it aims to explore the evolving forms of regulation (with a specific focus on accountability) that arise from polycentric or nodal security assemblages within an urban context. We test out the arguments made in favour of polycentric governance that these arrangements are less likely to undermine democracy and are more likely to allow for regulatory innovation – such as, for instance, embedded and circular accountability and oversight (Ostrom, 1987).

Secondly, the article seeks to understand the nature of accountability of private security, in particular, as it functions within these nodal systems. We will show how private security is held to account for its actions as it operates within a pluralised policing network – Brodeur's (2010) 'web of policing'. By accountability we simply mean having the obligation to answer (to another entity) for one's activities – this includes both those activities that have happened and that will happen (Stenning, 1995). It also means being transparent – allowing one's activities to be accessible to others (Lodge, 2004). The aim is not to provide an exhaustive normative account of systems of accountability but rather to focus on a select few relationships

of accountability that are paradigmatic and may serve to contribute to a broader understanding of how private security is empirically held to account in plural policing systems. We also view accountability as something embedded in social relations – forms of social control that can happen amongst nodes in plural arrangements, but also from outside these arrangements. It is here that the diversity of authorities and techniques can be seen, and which speaks to the importance of not giving conceptual priority to any one node, as mandated by nodal governance theory, to which we subscribe (Johnston & Shearing, 2003). This is to acknowledge that state and non-state nodes may both be sources and recipients of oversight techniques, both as regulators and as the regulated (Black, 2008). The overall aim of this article is therefore to move beyond conventional questions concerning accountability ('to whom', 'for what', and so forth) and to address issues of oversight and accountability as relational and fluid. The article therefore serves to fill in gaps in research on the interactional, local-level nature of accountability within polycentric arrangements, with a focus on private security. This is important, given the nature of new global harms or 'harmscapes', the increasingly pluralised security responses to them, and the continuing aspiration towards providing security for a public or common good (Berg & Shearing, 2018). We therefore need to move beyond established thinking about accountability if we are to meaningfully engage and keep pace – theoretically and normatively – with the shifting plural landscape of policing provision and the sometimes embedded systems of oversight which come with it.

What follows is a discussion of the different types or forms of accountability within polycentric arrangements involving the private sector, which is drawn from research conducted in South Africa in the 2000s and 2010s on polycentric (and hybrid) security arrangements involving state and non-state entities. In this case we draw from research conducted on City (or Business) Improvement Districts (CIDs), otherwise known as Special Rating Areas (See Berg & Shearing, 2008 and Berg with Shearing, 2015 for an overview of the CID phenomenon in the

South African context).

South Africa provides a useful site of engagement. Although unique in many respects due to its history (of Apartheid), its high levels of plural policing and high degree of involvement of private security, it nevertheless provides an interesting test site for plurality, comparable to both Global North and South contexts, depending on the site under investigation. This is because South African spaces – especially urban spaces – can be sites of 'limited' or strong statehood and these may often lie side-by-side (Börzel & Risse, 2016). The examples we draw from in this article, are largely from contexts of relatively strong statehood with high levels of plurality, where polycentric arrangements are established and developed.

However, the aim of the article is not to specifically provide a comparative perspective. Therefore, rather than explore the peculiarities or similarities of the South African context or detail the functioning of CIDs per se, we prefer to extract from the data the nature of the relationships of the nodes within these polycentric arrangements – the underlying accountability principles which inform them – for the purposes of achieving the objectives of this article, as well as to draw out learnings relevant to other contexts rather than specifically to Global North or South ones. In so doing, we opt to demonstrate diagrammatically the nature of relationships between the nodes in the polycentric assemblage, focussing primarily on four nodes (although there are many more):

- the CID managing body – a not-for-profit body which runs the CID through the top-up levies or taxes it receives from ratepayers in its approved CID area. It is primarily tasked with uplifting or improving the demarcated urban spaces in which ratepayers pay for its services. This includes cleansing, beautification, security, traffic improvement and so forth.

- the private security companies hired by the CID managing body, primarily responsible for safety and security in the public spaces of the CID;

- the local government body, which is the City Council or some local authority which originally approves the setting up of the CID and holds it to account;

- and, the South African Police Service (SAPS) (which is the national public police for South Africa), responsible for national policing.

Figure 1 below represents the types of relationships that the four entities have with each other. This diagram by no means represents the complexity of interactions and relationships between the entities – rather it characterises the dominant nature of coordination, with respect to being a predominantly political one or operational one.

Figure 1: Political and operational coordination between nodes
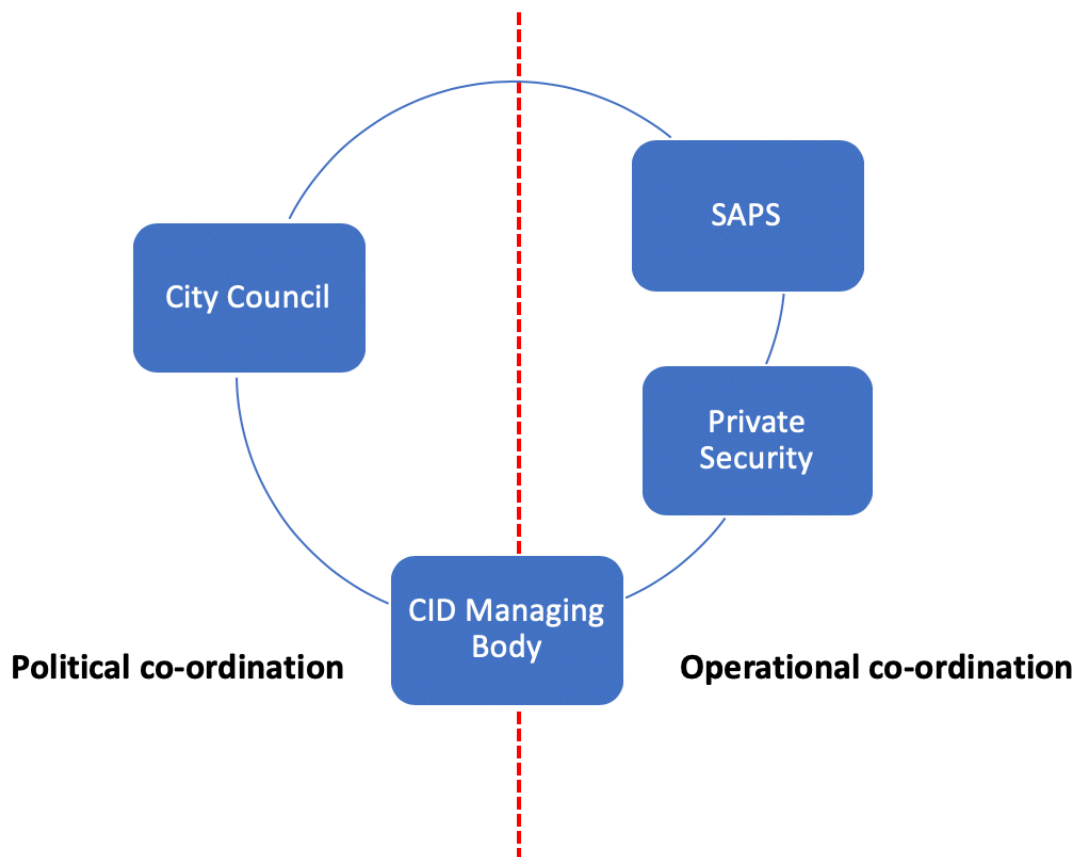
The diagram is divided by a red line to show where the various nodes are positioned with respect to political and/or operational coordination – with the CID Managing Body placed in both 'political' and 'operational' coordination. The nature of coordination between the City Council and the CID Managing Body is predominantly a political one, in terms of the fact that the City does not determine the operational imperatives of the CID Managing Body – however, there may be a service level agreement between the City and the CID Managing Body with respect to coordinating the services they provide in shared areas (such as cleansing services). The City has some political coordination with respect to the SAPS, but no operational control. The CID Managing Body has full operational control over private security, but none for the SAPS, whereas private security and the SAPS have a high degree of operational coordination where they regularly meet and decide on operations jointly. As we discuss the types of accountabilities between the nodes below, the nature of the relationships will be further explained.

Hierarchical systems of accountability

There are a range of what could be considered pre-polycentric accountability systems in place for all the nodes. These constitute a range of top-down, formal and/or state accountability mechanisms in place to regulate both state and non-state policing nodes. We call this hierarchical and avoid categorizing this as 'legal' accountability because it has long been apparent that the law is not necessarily hierarchical and has become ensconced in the "decentred locations of detailed regulatory apparatuses" (Lange, 2003, p. 412). Yet there are still gaps in terms of formal, hierarchical systems of accountability and, added to this, gaps in mutual accountabilities. In terms of the latter, we mean accountability relationships between security nodes in the polycentric assemblage. For instance, there is no, single, formal system

of 'horizontal accountability' that keeps all the nodes in the polycentric system accountable to each other (Braithwaite, 2006a). This is what others have found – that regulation tends to be "segmented and compartmentalised" (Crawford, 2005, p. 83). In other words, regulatory systems of oversight and accountability – at least with respect to the formal systems – have not kept pace with the developing degrees of coordination of polycentric assemblages on the ground. For instance, the SAPS are currently held accountable through a range of formal, oversight systems, most importantly of which is an independent oversight body called the Independent Police Investigative Directorate (see Berg, 2013 for a detailed account of the functions of this body). Like many other contexts, this police oversight body is a top-down entity ("accountability upward") rather than a bottom-up or grassroots one – hence it being characterised as hierarchical (Baker, 2008, p. 178; Fung, 2004). It is also deliberately exclusive in its role, because it is legally mandated to only focus on public policing entities thereby operating within a "bounded rationality" with respect to only seeing a smaller part of the bigger picture of nodal assemblages and hybridity of function (Braithwaite, 1999, p. 91). Similarly, the main regulating body for private security companies – the Private Security Industry Regulatory Authority – has very limited engagement with other state oversight bodies and engages with the regulation of private security as it would regulate a business – through licencing regulations, for instance. In other words, it does not regulate private security companies as entities which are responsible for *policing*, it thereby doesn't engage with private security's public space policing function and role in nodal security assemblages (although it does recognise this, it cannot legally act on it) (Berg & Nouveau, 2011). Although hierarchical systems of oversight and accountability are important in terms of their role in keeping nodes accountable, they tend to be ad hoc, reactive and focussed on individuals ("rotten apples") and individual institutions rather than systemic, preventative, and/or focussed on the assemblage in its entirety ("rotten orchards") (Bayley, 1995, Goldsmith, 1995, Prenzler & Ronken, 2001,

Punch, 2003, p. 171). This confirms the findings of others that hierarchical systems of accountability have not kept pace with polycentric systems on the ground and that traditional, hierarchical systems of oversight are being supplemented or even displaced by mutual (sometimes organic) systems of accountability (Crawford et al , 2005; Dupont, 2004, Johnston, 1999). Consider now the systems of contractual and market-orientated accountability arrangements in the polycentric assemblage.

Contractual and market systems of accountability

As mentioned, the CID Managing Body hires private security to provide public space security – there is a contractual agreement between the two. The contractual agreement is important for the CID Managing Body as it impacts directly on the legitimacy claims being made by it. In other words, one of the ways the CID Managing Body 'proves' itself is through the effectiveness and accountability of the private security companies it outsources – the CID can be dissolved or discontinued by the City if the CID Managing Body cannot show an improvement to the district under its care. This is an interesting situation in that the CID Managing Body of private security is invested in providing a public good and is held accountable to the state. This translates to the way in which the contract with private security plays out. Therefore, the lines of accountability, in general, are very direct in terms of the CID Managing Body dealing with any transgressions by private security guards. For instance, when the CID Managing Body receives public complaints against individual security guards it will take action through channelling the complaint through to the company and then monitoring the outcome until it is dealt with appropriately. Another example of this direct control and oversight over private security by the CID Managing Body, is that they may personally train

the private security guards they have contracted. This is unusual – usually training is done by the company itself or outsourced to a training company. But in this instance – again because of the seriousness of performing a public space service and the legitimacy claims tied into it – the CID Managing Body trains guards specifically in line with its needs which are aligned to the public interest. In this instance, the CID Managing Body has a heightened awareness of the implications of providing public space security. This is distinctly different to the type of accountability that happens with respect to the SAPS, for instance, where there is "no accountability in the sense of altering the police practice" with operational control ultimately vested in the public police, as mentioned (Manning, 2010, p. 157). Of course, this has much to do with the issue of police discretionary freedom (Bittner, 1970). The direct operational control of the CID Managing Body over private security confirms what many others have found in terms of the accountability relations between clients and private security companies (Loader, 1999; O'Connor et al, 2004; Shearing & Stenning, 1981; Shearing and Wood, 2003). Yet, what we have found is that this accountability relationship is intensified and far more involved within these nodal assemblages. Similarly, it has been found that the CID Managing Body may escalate this operational control rather than relinquish it. It is interesting to note that this close operational role of the CID Managing Body, is distinct from the client relationship with private security outside of these polycentric assemblages, where there is more of a willingness to allow private security to just get on with business (deferring to their professional expertise) (Mills & Koliba, 2014). Scale and context play a role in this trend towards operational accountability – specifically, the nature of the space and the fact that it is a plural system. In the former instance, the fact that the CID Managing Body operates in public spaces is an important contributor to this enhanced accountability. In the latter instance, the CID Managing Body depends on (legitimacy) relations with others to succeed in the polycentric assemblage.

Market accountability (and market incentives) play an important role here, but it needs to be

considered within the broader context of plurality. In other words, within this polycentric assemblage the CID Managing Body is tied into a complex networked system where public accountability (to be discussed) and political accountability (the CID Managing Body answerable to the City) are intertwined with market accountability. By implication this means that the positive effects of one system may mitigate the negative effects of another system. This finding is important, considering the criticism of contractual or market accountability as being largely insufficient on its own in holding private security accountable for their actions (Loader, 1999; Joh, 2004; Sarre, 1998) but that it can be effective as a regulatory tool within a mixed systems of accountability (Prenzler & Sarre, 2012, 2014). In this polycentric assemblage, these types of accountability (political and market) are intertwined. Further to this, an important component of the accountability systems in place within the polycentric assemblages are the informal and networked arrangements that have developed over the years. This is considered in the following section.

Informal and networked systems of accountability

Cold shouldering

Giving someone the cold shoulder is a well-known phrase, meaning to deliberately ignore someone. In this context, 'cold shouldering', as the name implies, is a strategy of holding others accountable by ignoring or excluding them if they do not conform to expectations or some rule(s) (Black, 2003). In our polycentric example, the SAPS employ (or threaten to employ) this strategy to motivate the CID Managing Body and private security to work towards a good relationship with them. The CID Managing Body relies on much of their reputation or legitimacy claims through their association with the SAPS. In order to successfully make legitimacy claims about their "stateness" and relevance in dealing with crime and disorder, they have to associate themselves with the SAPS and acknowledge the primary security role

that they play (whether or not this is an empirical reality) (White, 2011, p. 89). The CID Managing Body sees itself as accountable to them as well, especially in light of the fact that the SAPS can at any time stop working with them, and private security, and essentially give them the cold shoulder. This would mean that the SAPS would stop sharing information with them and also stop processing any arrests made by private security. In other words, the state-constituted power of private security would be removed and they would return to being 'ordinary civilians'. Implicit in this statement is that private security is afforded a special status by their association with the CID Managing Body, not necessarily afforded to other private entities outside of these particular polycentric assemblages. Of course, this status is informal (it is not a special deputisation or anything like that). It is also a very fragile status, contingent on performance and 'playing by the book'. There is considerable effort that goes into reputation and making legitimacy claims. Legitimacy claims made by the CID Managing Body and the private security companies they contract are made through a variety of means, many of which are the ways in which most businesses legitimise themselves (branding, marketing, self-regulation and so forth, Carmola, 2006). The fragility of the role of the CID Managing Body in public space security means that legitimacy claims have to be made continually to constantly affirm their role as relevant, accountable, effective, and a valued partner to the SAPS. Therefore, although informal, this system of accountability is more potent than the formal systems.

Incentivised self-regulation

There is no formal contract between the CID Managing Body (and the private security companies it contracts) with the SAPS. As others have found many of the nodal relations are informal and voluntary (see for instance Crawford et al, 2005 and Dupont, 2006). There are no

formal obligations or rules to inspire co-operation. Much of the co-operation is based on incentive – the prospect of mutual gain. Incentives are a fundamental part of the success of the CIDs. The "threat of ejection" from the plural systems of policing is a big incentive for private security and the CID Managing Body to self-regulate and adhere to accepted norms, especially in terms of their relationship with the public police (Crawford, 1999, p. 257). The CID Managing Body sees itself as being accountable to the SAPS even though the SAPS technically has no operational or oversight authority over them (except if they transgress the law), and vice versa. This confirms the importance of informal, horizontal systems of accountability hinged on mutual accountabilities that have developed over time without any formalised arrangement or contract.

Further to this, there is a strong relationship between the CID Managing Body and the City, in most cases based on a (service delivery) contract. But in some respects, the daily, ground-level interaction between the CID Managing Body, private security and the SAPS is seen to trump even this contractual arrangement. Again, with no formal contract or agreement being signed between the two entities. This confirms Ayres and Braithwaite's (1992) finding that you may need a 'big stick' somewhere in the regulatory mix – usually at the top – so that when institutions do not self-regulate, escalation of regulatory techniques will be enforced, culminating in the most 'intrusive' punitive action (the big stick as it were). However, the research has found that the 'big stick' need not be a formal mechanism; it can be various techniques (confirming the findings of Burris et al., 2007). It need not be punitive, it need not be a gradual escalation, or at the top (but an immediate technique always in the background) (Wood & Shearing, 2007). Or there may not be a 'big stick' at all – at least not in the conventional sense. This is related to the nature of polycentric governance systems and the way in which they legitimise themselves. In this case, the 'big stick' is replaced by an incentive, i.e.

that the good relations with the SAPS (and others) is integral to legitimacy claims being made by the CID Managing Body and private security – losing this relationship is viewed as detrimental to the CID in its entirety. It is also not necessarily the case that voluntary self-regulation is ineffective, on the contrary it may be more effective than other forms of regulation (Braithwaite, 2000, see also Black, 2001 for a detailed overview of 'self-regulation'). Self-regulation may be very strongly motivated, especially for non-state entities that derive considerable legitimacy from their ability to show that they are accountable. These accountability developments constitute the core of what polycentric assemblages are meant to promote – sites by which innovative, 'smart' and decentred regulation happens in light of the inadequacies of a reliance solely on state-constituted and/or hierarchical regulatory systems (Black, 2003, 2008; Braithwaite & Drahos, 2000; Gunningham, 2009; Gunningham & Grabosky, 1998; Jones, 2003; Walker, 2002).

Public and political accountability

The research found that public and political accountability are intertwined in these nodal assemblages. In order to elaborate on this, consider the incident outlined at the start of this article involving the SAPS and private security jointly committing a transgression (the assault of a suspect) which was recorded and publicly shared via social media and other outlets, resulting in a public outcry. What is interesting in this scenario was how accountability played itself out after this video footage was placed in the public domain. The public police officers were suspended by their police management, arrested for assault, and the Independent Police Investigative Directorate, mentioned earlier, launched an official investigation. The private security guards were suspended, pending an investigation by the CID Managing Body who then stated in the media that they would co-ordinate their investigation with that of the public

oversight body. Political leaders also commented on and denounced the behaviour in the media. The body that is missing in this instance is the Private Security Industry Regulatory Authority – which is not surprising given, as mentioned, its mandate to regulate private security as a business and not to regulate criminal conduct per se.

There are two points to be made here. Firstly, that oversight bodies meant to hold public police institutions to account for their actions have a tendency to be ad hoc and reactive more than they are systemic and preventative, as mentioned above. They focus on deterrence through operating on a case-by-case basis, dealing with the punishment of individual transgressors after the breach of a law (see Bayley, 1995 and Goldsmith, 1995). Secondly, there is a gap in the way in which private security is regulated *by statutory bodies* and the fact that it is not regulated as a *policing* entity, as mentioned, despite performing *core* police functions (for instance, see Berg, 2010 on public space policing). The absence of the private security regulator in the scenario described above (and in many other instances that have made the press), to reiterate an earlier point, speaks volumes about the inability of traditional regulatory systems to keep pace with shifting dynamics on the ground given their mandate and the state-centric assumptions from which their mandate is derived. Yet the scenario above also challenges the prevailing argument in the literature that this constitutes a gap in regulation (Joh, 2004). This is not the case in this situation. Despite the private security regulator's absence private security is held publicly accountable for its actions by the CID Managing Body, by the City (who receives complaints about it) and by the general public – by default, they have filled a gap and become the avenues for criminal complaints against private security companies. What the research has shown is that there is a considerable blurring of political, public, and market accountability in these arrangements. A concern in the literature is that non-state entities (particularly private security) are not normatively, nor in practice, accountable to the public

(Crawford et al, 2005; Forst & Manning, 1999; Joh, 2004). In contexts of both strong and weak state governance, the SAPS may not be publicly accountable either, but, the argument goes, at least there are formalised oversight systems in place which can be strengthened as evidenced by the massive police reform attempts in Global South contexts (Bayley, 2006; Hills, 2008; Marenin, 2005, 2007). But these findings have shown that the organic, informal development of accountability, linked to the desire to gain legitimacy by the CID (the client of private security) which is politically held accountable, has compelled private security to be accountable (or at least to be answerable), not only to clientele but to the broader public.

Informational accountability or transparency

Another important component of the accountability arrangements in our nodal examples is the informational accountability and resulting transparency emerging from the non-state, in particular. Informational accountability is making information about a node publicly available (Crawford, 1999). The CID Managing Body is very good at doing this, through a variety of mechanisms such as the use of local surveys to elicit information from the public about specific needs. In one instance, the research found that private security was instructed to report to at least ten businesses a day within the CID as a public relations strategy and to demonstrate openness and responsiveness to the needs of the 'tenants' or ratepayers of that space. In another instance, the CID Managing Body had hired a marketing person for the specific purpose of gathering opinions from the companies within its boundaries. This would entail visiting each company once a year, and also phoning each company at least once or twice per year. During the visits a visit form was given to the company to complete. All the forms, once completed and signed or stamped by the company being visited, would then be returned to the CID Managing Body which would address all the problem areas identified by the companies.

Furthermore, the CID Managing Body may invest considerable time and money on marketing themselves. This is tied directly into legitimacy claims being made. In these examples, one can see the CID Managing Body holding themselves accountable through mechanisms of transparency, which goes far beyond the City's formal oversight requirements (that they provide an annual report and that they conduct an initial opinion survey of their areas). The CID Managing Body may thus go above and beyond the official accountability requirements and strive to be transparent to their tenants but also to the general public, this extends to the accountability relations with private security which is then mandated to also fulfil these requirements on behalf of its CID Managing Body.

Hybrid accountability

It is worth reflecting on an interesting phenomenon – that of the merging of identities of those involved in the polycentric assemblage, particularly the CID Managing Body (individuals) taking on multiple roles and identities. For instance, at one point in the research a security manager of the CID Managing Body was also the chair of the local community police forum – a state sanctioned and legislated forum which is run by the SAPS to improve police-community relations. Here there is a blurring or overlaying of the client and the public interest, and there is no 'either'/'or' contradiction, they are fused into the role of individuals and the relations between them. Generally, much of what we found can be explained through Scott's (2000) notion of extended accountability, where traditional systems of accountability are merged into mutual accountability networks, which are also overlapping and thus build in a redundancy (if one fails, another can take its place). However, the notion of extended accountability does not fully account for this particular instance of the dual role of non-state actors. We have thus opted

for the notion of 'hybrid accountability', but not as it is understood by Fung (2004, p. 80) as meaning a mix between top-down and bottom-up accountability. We would argue that the system of accountability as described above may be more complex than a hybrid mix of two approaches. Governance scholars within legal discourse and in conflict studies use the concept 'hybrid' to mean the ways in which the non-state may borrow or enrol the authority of state entities to fulfil their mandates and the two become blurred (see Black, 2008 and Scott, 2000). This also ties into the notion of the "simultaneity of authority", which sees a merging of the state and non-state and where an individual "draws on, articulates and practises several registers of authority simultaneously" (Albrecht & Moe, 2014, p. 1, 2). Hybridity understood in this way is a more useful way to explain the merging of state and non-state authorities and formal and informal systems of oversight and accountability in this polycentric assemblage. A focus on hybrid systems of accountability within security governance debates – particularly that which focuses on policing – is very limited, our finding of how accountability happens in evolving polycentric systems of governance answers the call by scholars, such as Stenning (2009), to engage with the effects of the blurring of private and public policing on issues of accountability and governance.

The research has thus shown that accountability in polycentric assemblages may happen through formal processes, but also can evolve through informal means (vertical and horizontal accountability). In our example, there is a complex system of accountability, which has evolved linked to a variety of incentives, such as mutual need and legitimacy, as discussed. These systems are very much intertwined and adaptive, and they derive their sources of authority from multiple places. For instance, informal accountability is every bit as important for holding non-state entities publicly accountable as political systems of accountability. Yet political accountability may be held up as a normative ideal and informal accountability systems

regarded as less effective. By holding political accountability as the normative ideal, state-centric notions of democratic accountability prevail, leading scholars to call for a bigger role for government, which may not be appropriate. The security activities of the polycentric assemblage is not separate or independent from the accountability activities taking place – it is very much happening at a local level. In other words, regulation is fluid and works horizontally and vertically from many sources, sometimes simultaneously. Organic processes and daily transactions between nodes may also 'fill in' the gaps left by formal systems of accountability.

Conclusion

We have shown how the system of accountability in polycentric assemblages is evolving and complex. The 'real' accountability lies in the daily transactional relationships between nodes – both complementing and supplanting formal systems of regulation. This is not to say that this complex local-level, 'circular' accountability in the polycentric assemblage is necessarily watertight in practice (Braithwaite, 2002). It is to say that plurality seems to have promoted systems of informal regulation and given effect to formal regulation. We have also found what scholars such as Trubek and Trubek (2007) had predicted; that the tension between old systems of accountability and new systems of governance would lead to a transformation of the system into a hybrid system of formal and informal mechanisms. Similarly, scholars such as Baldwin and Black (2008) and Braithwaite (2006b) have found that adaptation occurs in plural systems where regulatory tools are found to be lacking. In other words, whereas polycentric systems are attributed to creating the conditions whereby the boundaries of activities and responsibilities of nodes are so blurred that it is difficult to hold any one node accountable should something go wrong (see works of Crawford, 1999 and Crawford et al., 2005, for more on this problem of 'many hands'), we have found that this blurring is also potentially a benefit through the instances of hybridity and the ways in which informal mechanisms may serve gap-

filling functions. What we have also found is that private security is held accountable on a number of levels, particularly by its client and legitimacy claims being made by it, but that the nature of the client and its role in polycentric formations is important in aligning this accountability to a public good. There has been focus on regulating private security through regulating the buyer and the seller and "civilising" the market through moralising it and including more public sector regulation (Loader & White, 2015). Here we have found that polycentric assemblages may create the conditions by which innovative regulation may evolve resulting in the democratic (and hybrid) accountability of security nodes – but only if the right conditions are in place to facilitate this.

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