

**ALIGNING PROGRAMMATIC IDEALS AND TECHNOLOGICAL CAPABILITIES:
THE CASE OF SUSTAINABILITY ASSURANCE**

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Abstract

This paper investigates the nature of and dynamics surrounding the operationalisation of sustainability assurance within two Big 4 professional services firms who have developed significant markets in this area. Drawing primarily on a longitudinal series of in-depth interviews conducted over a four and a half year period with practitioners in both firms, the paper seeks to develop and deepen our understanding of the processes and practices through which practitioners construct sustainability assurance. Power's (1999) theorisation of the loosely coupled relationship between the programmatic and operational aspects of audit is mobilized to frame the study's findings. The analysis reveals an uneasy and shifting relationship between the operationalisation of assurance and the realisation of its emerging programmatic ideals with embryonic local discourses and tacit knowledge embedded in highly subjective assessments of evidence emerging as key technological resources adopted to make assurance possible. Recent moves to structure loosely formulated practices within methodological 'shells' derived from financial audit have formalised and rationalised practice while rarely guiding detailed assurance procedures. This shift towards structure has occurred in the midst of ongoing tensions between accountant and non-accountant assurers over legitimate approaches to the gathering and assessment of evidence. In light of the operational challenges and tensions, both firms have moved to publicly acknowledge the technological limitations of traditional financial audit practice while simultaneously offering an external 'expert' stakeholder solution that can be coupled with existing practice. The paper reflects on these findings in the context of Power's (1999) aforementioned theorisation.

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INTRODUCTION

The economic success of the Big 4 professional accounting firms has been heavily influenced by their willingness and ability to expand into new and potentially lucrative areas of business from a traditional base in auditing, taxation and insolvency (Free et al., 2009; Gendron and Barrett, 2004; Power, 1997, Radcliffe, 1998). In the past two decades many of these firms have translated their core expertise in financial audit to successfully develop and secure new markets in efficiency auditing (Radcliffe, 1999, 1998), quality auditing (Swift et al., 2000; Power, 1997), environmental auditing (Power, 2003, 1997) and government auditing (Gendron et al., 2007). This expansion has been partly facilitated by the ability of accountants to translate the somewhat abstract concepts and terminology underpinning traditional attest audits into non-financial audit arenas (Free et al., 2009; Power, 1999, 1997).

A recent manifestation of this translation is evident in the Big 4 professional services firms' capture of a significant share of the growing market in assurance on sustainability reports (heretofore, termed sustainability assurance). The market for assurance provision is divided up between certification bodies, specialist consultancies and the Big 4 professional services firms with KPMG's (2008) recent survey indicating that these firms control 70 per cent of the sustainability assurance market among G250 companies, up from 58 per cent in 2005¹. Given this growth and the accompanying increased involvement of professional accountants in its delivery, sustainability assurance now figures highly on the agenda of several standard-setting bodies, including the International Auditing and Assurance Standards Board (IAASB) which included the development of a sustainability assurance standard in its strategic aims for 2009 to 2011 (IAASB, 2007).²

Most prior academic studies examining the emergence of sustainability assurance have examined the content of assurance statements (see Cooper & Owen, 2007; Darnall, Seol, & Sarkis, 2009; Deegan, Cooper & Shelly, 2006a, 2006b; O'Dwyer & Owen 2005, 2007; Park & Brorson, 2005; Simnett, Vanstraelen & Chua, 2009) while recent studies have commenced engaging directly with practitioners. The latter stream of work has specifically sought to better understand the processes through which practitioners seek to legitimise assurance with key audiences (O'Dwyer et al., 2009) as well as practitioner perspectives on its future development (Edgely et al., 2008).³

This paper has two core objectives. Firstly, it aims develop and deepen our understanding of how assurance practitioners have come to construct a new unregulated assurance practice, namely sustainability assurance. Secondly, it seeks to develop our understanding of how the construction of practice has been aligned with the emerging programmatic aims held out for sustainability assurance. Drawing on a longitudinal series of in-depth interviews with

¹ The G250 sample comprises the top 250 of the Fortune 500 companies. 40 per cent of the G250 companies publishing sustainability reports in 2008 including formal assurance statements compared with 30 per cent in 2005.

² Other professional accounting bodies such as the Fédération des Experts Comptables Européens (FEE, 2002, 2004, 2006) and the Dutch Royal NIVRA (Royal NIVRA, 2005, 2007) have already issued specific guidance and standards for accountant assurers conducting social and environmental assurance-type engagements. More broadly, the UK professional institute AccountAbility (1999, 2003, 2008) has also developed an assurance standard (AA1000) complementing aspects of the guidance emanating from the IAASB's ISAE 3000 standard on assurance engagements other than audits or reviews of historical financial information. Further support and suggestions for assurance on social and environmental reports has emerged from the Global Reporting Initiative (GRI, 2006, p.38) and professional bodies in Germany, Sweden, Australia and Japan (FEE, 2006) while AccountAbility and the International Register of Certificated Auditors (IRCA) have launched a professional qualification in so-called 'sustainability assurance' practice (IRCA, 2004).

³ The terms *practitioner* and *assuror* will be used interchangeably throughout the remainder of the paper.

practitioners in two Big 4 professional services firms (code-named TRU and JIF) and a detailed analysis of diverse documentary data, the paper specifically investigates the nature of and dynamics surrounding practitioners' emerging efforts to operationalise sustainability assurance within these professional services firm contexts. This focus is distinct from the prior field based work examining sustainability assurance in that it centres more specifically on "the task dimension of [assurance]" (Power, 1996, p.292) in order to elicit insights into the organisational reality of emerging practice (Power, 1995). Power's (1999) theorisation of the loosely coupled relationship between the programmatic and operational aspects of audit (see also, Radcliffe, 1999; Curtis and Turley, 2007) is used to analytically frame the study.

The study's aims are important for two reasons. First, given the increasing societal and political attention being afforded to corporate social and environmental activities and consequences (Hopwood, 2009), sustainability reporting is coming under increased critical scrutiny with claims circulating that it actually reduces as opposed to increases the visibility of corporate sustainability impacts (Gray, forthcoming; Hopwood, 2009; Milne & Gray, 2007). Developing a deeper understanding of the way in which the operational tasks and routines of assurance practice are constructed in light of its programmatic aims can provide key insights into the extent to which practice may enhance the reliability and credibility a range of report users may place on reporting content. Second, the rare prior work directly examining new auditable contexts has largely focused on more regulated, public sector environments (Gendron et al., 2007; Radcliffe, 1999; but see Free et al., 2009 for an exception). However, the discretionary, largely unregulated nature of the sustainability assurance environment in which this study is conducted represents a unique opportunity to examine the construction of a new, unregulated assurance practice within the context of highly regulated professional services firms (Free et al., 2009).

The paper aims to contribute to the literature by extending and developing prior research investigating auditing and assurance in their social and organisational context (see, for example, Curtis and Turley, 2007; Free et al., 2009; Fischer, 1996; Gendron, 2001, 2002; Gendron and Barrett, 2004; Gendron and Spira, forthcoming; McCracken et al., 2008). First, it responds to continuing calls for researchers to extend examinations of the complex back stage of *new* audit type practices, particularly those of a discretionary nature (Free et al., 2009), in order to develop our limited knowledge and understanding of how audit-associated practices have been exported into new arenas and their effects and consequences (Free et al., 2009; Power, 2003). In this vein, the paper specifically builds on prior work by Radcliffe (1999) examining the operationalisation of efficiency audit and Free et al.'s study (2009) of KPMG's enactment of assurance on the Financial Times (FT) MBA rankings scheme. Second, while much prior work examining the expansion of accountants into new assurance domains has largely focused on wider institutional level discourses and dynamics (Gendron and Barrett, 2004; Shafer and Gendron, 2005; Swift et al., 2000), the more localised focus of this paper seeks to uncover what it is that makes the *craft* of assurance feasible (or not) for multi-disciplinary practitioners operating in professional service firm environments. The paper's prioritisation of practitioners' detailed understandings and practices (Radcliffe, 1999) and the ideals they espouse (Pentland, 2000) facilitates this deeper understanding, as technical practice cannot be disentangled from the stories which are told of its operational capability and possibility (Power, 1999). This focus also reveals aspects of the processes through which new multi-disciplinary practices have evolved in large multi-national professional services firms. Third, studies of the relationship between the programmatic ideals of new audit/assurance practices and the more localised stories of their core operational capability are rare (Free et al., 2009); but such studies are important as they allow us to trace the means

through which programmatic aims held out for new forms of assurance are translated into operational tasks and routines within real-life organizations (Cooper and Robson, 2006). This focus empirically informs and nuances Power's (1999) insights with respect to the export of the 'idea' of audit into domains outside its traditional roots in financial audit and those reflecting on the relationship between the programmatic and technological aspects of audit.

The remainder of the paper is structured as follows. Drawing primarily on Power (1999) and Radcliffe (1999), the next section discusses the loosely coupled relationship between the programmatic and technological aspects of audit. The programmatic aims held out for sustainability assurance which have emerged from a variety of official sources, including the two firms studied, over the past decade are then discussed. This is followed with an outline of the research methods used in the case. The two professional services firm case contexts are then described in advance of the case narrative which focuses on tracing the means through which practitioners in both firms have come to construct assurance. These findings are subsequently discussed in light of Power's (1999) aforementioned theorisation of the loose coupling between the programmatic and technological elements of audit. Finally, some future research directions are proposed.

THE PROGRAMMATIC AND TECHNOLOGICAL ELEMENTS OF ASSURANCE

This section mobilises Power's (1999) theorisation of the relationship between the programmatic and technological elements of audit in order to provide an interpretive framework for understanding and analysing the empirical data exploring assurors' perceptions of the operationalisation of sustainability assurance practice.

The nature of programmes and technologies

Power (1999) draws on Miller and Rose's (1992) distinction between programmes and techniques to distinguish the aims or ideals held out for audit from the variety of specific operations, procedures and practices that are enrolled to fulfill these aims (Pentland, 2000). *Programmes* encompass the ideas and suggestions of experts, specialists, individuals, committees and other organisations that are embodied in reports, proposals, plans and legislation, "and in taken for granted (tacit) knowledge" (Radcliffe, 1998, p. 380). They establish broad frameworks for action articulating what is desirable in a particular field (Rose and Miller, 1992, p. 182).⁴

Programmes are enacted by actors using *technologies* which aim to match programmes with action (Rose and Miller, 1992). Programmes may only be fulfilled to the extent that they can be realised through technologies, whose mechanics involve both sets of formal practices and the ideas and knowledge that underpin these practices (Radcliffe, 1999, 1998). While technologies are in principle unlimited, they largely encompass heterogeneous, "humble and mundane mechanisms" (Rose and Miller, 1992, p.183) such as: types of notation, computation and calculation; systems of data storage and analysis; methods of standardization and calculation; and the instillation of habits (Rose and Miller, 1992, p. 183; Radcliffe, 1998,

⁴ Programmes are, however, "not simply formulations of wishes or intentions" (Miller and Rose, 1992, p. 182) as programme proponents claim certain knowledge of the field in which a programme will intervene or which it will create (Radcliffe, 1998). For example, an effort to establish a programme for the efficient and effective management of government involves a presumption of knowledge of management and other fields (Radcliffe, 1998, p. 380).

p. 381). The operationalisation of programmes through technologies requires levels of interpretation (Rose and Miller, 1992) which can lead to confusion and conflict between programmes and their associated technologies (Radcliffe, 1998, 1999). For example, Radcliffe (1998, pp. 382-383) claims that the technological solutions for one programme may have unexpected consequences through becoming the problems that lead to the establishment of new programmes. Moreover, while the programmatic and technological are largely considered as separate analytical categories, they can also operate *in conjunction* in practice, with available technologies often informing the development of programmatic aims (Radcliffe, 1999).

The programmatic and technological elements of auditing

The programmatic elements of auditing encompass the programmes, ideas and concepts which shape the mission of audit practice and attach it to broader policy objectives existing in the political sphere (Power, 1999). These concepts and ideas manifest themselves in broad goals which it is assumed the related 'audit' practices are capable of fulfilling. While new programmatic demands can evolve, according to Power (1999) these ideas invoke a certain abstract ideal about what auditing is aimed at achieving which is vague enough to allow the idea of audit to percolate into other domains and become attached to different goals (see also Pentland, 2000, Radcliffe, 1998, 1999).

Technological (or operational) elements of auditing are the various concrete tasks and routines (technologies) that are invoked in the world of the audit practitioner. These encompass the various individual methods providing specific means to act (Radcliffe, 1998) such as sample selection, detailed testing procedures, and analytical methods that make up auditing practice; and are evident in audit manuals, software, and planning materials (Power, 1999; Radcliffe, 1998). Over time, these practices have become codified and formalized thereby allowing them to be written up and recorded in a manner deemed legitimate by practitioners (Curtis and Turley, 2007). These operational methods are, however, not necessarily clear cut as practitioners constantly debate and discuss their efficiency and attempt to establish cost effective ways of providing assurance on matters that are often inherently subjective (Power, 1999). Moreover, while formal technologies are often associated with the popular image of auditing as a bureaucratically rational practice, *informal* ideas and practices drawn from the accumulation of *local discourse and tacit knowledge* represent technologies that may be of even greater importance to practitioners in allowing them to make different forms of audit possible (Radcliffe, 1999). It is the emergence of these formal and informal technologies in the realm of sustainability assurance and their relationship to the programmatic ideals held out for this form of assurance that forms a key part of the focus in this paper.

The loose coupling between audit programmes and technologies

Programmatic ideals embedded in official definitions of practices in promotional and guidance documents represent "an idealized, normative projection of the hopes invested in practice" (Power, 1999) and therefore offer a statement of potential rather than a description of actual operational capability. Hence, the programmes, concepts and ideas shaping the development of audit practice are, at best, *loosely coupled* to the operational level tasks and routines performed in their name (the technologies) (Power, 1999, p.69). Programmes and technologies may also diffuse at different rates with, for example, the rhetoric of accountability and verification often embedded in the programmatic aims for audit sometimes spreading well before *or* trailing behind actual technical procedures for auditing. Programmes and techniques in financial auditing have, for example, varied considerably over time and

space suggesting that shifts in orientation at both levels are possible even in seemingly stable domains (Pentland, 2000). The historically uneasy and changing relationship between financial audit practice and the programmatic goal of discovering fraud illustrates how available practices can shape and temper ambitious programmatic aims; a process which can potentially lead to a questioning of the value of audit (Power, 1999).

The nature of the technologies enrolled

The nature and extent of the audit technologies enrolled to fulfil programmatic ideals depends on the degree to which they can create an *appearance* of satisfying programmatic demands while also proving economically feasible (Power, 1999, p. 75). Audit technologies need to attain “institutional credibility as technique” (Power, 1999, p. 69) as what ends up counting as reasonable procedure and evidence is grounded in an evolving practitioner consensus in which tasks and routines are given meaning within wider operational frameworks – “techniques must be [deemed] legitimate before they can be efficient” (Power 2003, p. 383). Hence, what counts as verification and testing requires a background consensus to support the use of certain technologies as evidence is always relative to the rules of acceptance for particular communities (Power, 1999, p. 69).⁵

Moreover, in order to legitimise the often *ad hoc* procedures constituting audit practice and indeed the audit process itself, formal overarching audit methodologies are often developed to “represent audit as a rational process both internally and externally” (Power, 1995, p. 326; Curtis and Turley, 2007). This provides structure to a range of individual audit technologies (see Free et al., 2009, Power, 1999, p. 36) which are frequently negotiated, interactive and judgmental, therefore potentially clouding the influence on practice of practitioner “gut feel” and tacit knowledge (Pentland, 1993, p. 620; Radcliffe, 1999). This structuring helps to ensure that auditing *looks* as if it works rationally and objectively towards achieving the programmatic aims driving its existence (see also, Humphrey and Moizer, 1990; Curtis and Turley, 2007; Kosmala MacLulich, 2003) even if in reality these methodologies merely represent a loose framework for the exercise of judgement (Humphrey and Moizer, 1990; Kosmala MacLulich, 2003).

Exporting audit and assurance to different contexts

The aforementioned ambiguity surrounding what audits actually produce has eased its export to other contexts thereby allowing auditing, in its various forms, to “satisfy different aspects of the mood of the times” (Power, 1999, p. 68). As new objectives emerge, assurance [auditing] practices continually reassemble themselves to meet these expectations (Power, 1999, p. 42), a trend evident in the exportation of audit to contexts such as efficiency auditing, environmental auditing, e-commerce assurance, quality auditing and government auditing (see for example, Power, 1997; Free et al., 2009; Radcliffe, 1999, 1998; Gendron and Barrett, 2004; Gendron et al., 2007).

⁵ The extent to which judgement alone is relied upon has been discussed in debates about structured versus unstructured audit approaches concerning the relative balance between trust in individual practitioner judgement and the need for conformity to formal and publicly defensible rules of conduct. As Carpenter et al. (1994) and Curtis and Turley (2007) illustrate, structure in the form of standard operating procedures is often promoted as it enables large auditing firms to control individual practitioners who often prefer inventive and *ad hoc* methods based on broad principles (Power, 1999, p. 74, see also Curtis and Turley, 2007; Gendron and Spira, forthcoming).

While there has been little empirical research examining new auditable private sector contexts in practice (Cooper and Robson, 2006; Free et al., 2009), there is evidence to suggest that expanding professional audit work is not without significant difficulties (Abbott, 1988; Gendron and Barrett, 2004). Coupling programmatic aims with supporting technologies is especially challenging for accountants developing new forms of audit/assurance expertise as new technologies also largely emerge through trial and error processes involving high levels of subjectivity and instinctive judgement (Humphrey and Moizer, 1990; Fischer, 1996). New audit/ assurance contexts also require the extensive enrolment of practitioners from non-accounting disciplines to form multi-disciplinary teams (see Humphrey and Swift, 2000; Power, 1997).⁶ The difficulties of coordinating these different functional specialities can be underestimated as it is sometimes assumed that the discrete technical practices of different disciplines will remain intact when working with other disciplinary experts. However, this ignores “the forms of reductionism in applied settings through which particular forms of expertise become dominant” (Power, 1997, p.130) as in practice, what matters most with respect to the work completed is who the “institutionally legitimate orchestrator” (Power, 1997, p. 130) of the work” is; in other words, “who leads the process and who does the ‘nitty gritty’” (Power, 1997, p. 130).⁷

The expansion of Big 4 professional service firms with a core expertise in financial audit into sustainability assurance has partially arisen due to emerging demands for a “new transparency of organizational ... [sustainability] performance” (Power, 1999, p.68) and is a contemporary example of the exportation of audit to new contexts and subject matters. Before exploring the process through which assurors have come to construct technologies capable of delivering sustainability assurance, we first need to uncover the nature of the programmatic ideals held out for this form of assurance that emerging technologies are supposedly designed to serve.

THE VALUES AND GOALS INSCRIBED IN THE OFFICIAL PROGRAMMES PROMOTING SUSTAINABILITY ASSURANCE

This section reviews the recent development of programmatic aims for sustainability assurance both generally and within the two firms studied. It examines the aims documented in manuals, calls for action, proposals, standards and other documentation produced by professional accountancy (and other) bodies that have been formally held out as the basis for professional action in sustainability assurance. The programmatic aims evident in publicly available assurance documentation produced by the two professional services firms (JIF and TRU) studied are also reviewed.

⁶ This was highly evident in the emergence of the related field of environmental auditing in the 1990s (see Power, 1997, pp. 129-131).

⁷ This was especially evident in the emergence of environmental auditing in the 1990s when accountants staked their claim to control of the ‘new’ auditing processes through promoting their relevance given “sufficient similarity between [financial auditing] know-how and environmental auditing” (Power, 1997, p. 134). They also asserted that accountants possessed a discrete body of knowledge in the form of auditing skills which gave them a comparative advantage over other professional groupings. Accountants also claimed expertise in sub-contracting work to other specialists as part of the financial audit process in line with professional auditing standards. Hence, accountants staked their claim to core competence by forcing other experts into the category of sub-contractable expertise (Power, 1999, p. 81). According to Power (1999) reliance on this ‘other’ expertise, whether internal or external, “enables the unauditible to be auditable by creating a chain of opinions in which the auditor distances himself from the first order judgements of the expert” (Power, 1999, p. 12). Hence, the unproblematic nature of multi-disciplinary practice in achieving broad programmatic aims should not be taken for granted.

Programmatic aims articulated by professional accounting (and other) associations

The programmatic aims shaping the mission of sustainability assurance have emanated from two key sources: the accountancy profession and independent professional institutes committed to promoting sustainable business practices.⁸ Up until 2005, calls for action from the Federation of European Accountants (FEE) and the International Auditing and Assurance Standards Board (IAASB), in conjunction with the IAASB's standard ISAE3000 *Assurance engagements other than audits or reviews of historical financial information*, mapped out limited possibilities for sustainability assurance focused on providing comfort to stakeholders and management regarding the *accuracy* of reported data.⁹ Scant consideration was given to more ambitious aims focused on assessing the relevance and completeness of reported information.

In contrast, the UK based non-profit body AccountAbility has consistently articulated these more ambitious aims. AccountAbility has prioritised comprehensive accountability to stakeholder groups emphasising the necessity of providing assurance with respect to the completeness and relevance as well as the reliability of reported information (see, Owen et al., 2009). The body issued a sustainability assurance standard, AA1000AS, in 2003 which it updated in 2008 after an extensive stakeholder consultation process.¹⁰ According to this standard, an overriding aim of assurance is to “hold an organisation to account for its *management, performance and reporting* on sustainability issues” (AA1000AS, p. 6, emphasis added).^{11 12}

The ambitions for assurance espoused by AccountAbility and the professional accounting bodies have aligned somewhat since 2005. Many professional accounting bodies have begun to recognise that the aims they initially attached to assurance needed to become more aligned to key stakeholder focused issues if practice was to advance and attain greater credibility. The need for this broader set of objectives was initially voiced as follows in a combined AccountAbility/KPMG publication:

While the value of assurance to ensure reliable and comparable data for management and certain user groups still remains, today's assurance process needs to go beyond assessments of accuracy to explore the quality of processes such as stakeholder engagement and organisational learning and innovation, as well as the way in which

⁸ The main accountancy bodies encompass: the International Auditing and Assurance Standards Board (IAASB), under the auspices of IFAC; the Federation of European Accountants (FEE) (FEE, 2002, 2004, 2006) which has been particularly active in promoting the adoption and standardisation of sustainability assurance for over a decade; and several national accountancy bodies including CPA Australia, The Canadian Institute of Chartered Accountants (CICA), Royal NIVRA in The Netherlands, the Association of Chartered Certified Accountants (ACCA) in the UK, the Institute of Chartered Accountants in England and Wales (ICAEW) and other professional accounting bodies in Germany, Sweden, and Japan (FEE, 2006).

⁹ In most cases, the data to be assured was selected by the reporting companies, thereby significantly limiting the scope of assurance.

¹⁰ Less specific guidance has emerged from the Global Reporting Initiative (GRI).

¹¹ This can apparently be achieved by evaluating the adherence of an organisation to the AA1000 Accountability Principles (AA1000APS, 2008). These include a ‘foundation principle’ of inclusivity – involving the participation of stakeholders in developing and achieving an accountable and strategic response to sustainability (AA1000APS, 2008) – and two other principles of materiality and responsiveness

¹² Material issues are those issues that will influence the decisions, actions and performance of an organisation or its stakeholders (AA1000APS (2008, p.12). Responsiveness “involves an organisation's response to stakeholder issues that affect its sustainability performance. It is realised through decisions, actions and performance, as well as communication with stakeholders” (AA1000APS (2008, p. 14).

the organisation aligns strategy with key stakeholder expectations (Iansen-Rogers and Oelschleegal, 2005, p. 23).

AccountAbility was especially influential in encouraging this coalescence of aims. It consistently encouraged professional services firms and accounting bodies to broaden their ambitions for assurance and actively promoted the complementary usage of AA1000AS and the IAASB's generic standard ISAE 3000. It also consulted extensively with both accountant assurance practitioners and professional accounting bodies such as FEE with respect to the contents and aims of its revised AA1000AS standard. ISAE3000 and AA1000AS are now the most commonly used assurance standards worldwide (KPMG, 2009) with several large professional accounting firms, including the two firms examined in this study, often using both standards in the same assurance engagements.

This acceptance of a more ambitious stakeholder focused set of aims for sustainability assurance among accounting bodies is most evident in standard 3410N *Assurance engagements relating to sustainability reports* issued by the Dutch professional accounting body Royal NIVRA in July 2007. The standard, which the IAASB are considering using as the basis for its proposed international standard, promotes the provision of assurance with respect to the reporting criteria of relevance, completeness, reliability, neutrality and understandability (Royal NIVRA, 2007, p. 10) which are "defined from the perspective of the intended users" (Royal NIVRA, 2007, p. 8) of a sustainability report. In terms of committing to delivering on the key programmatic aim of delivering organisational accountability to stakeholders, 3410N is by far the most ambitious standard that any accounting body has produced and looks set to replace generic ISAE 3000 standard as the main standard informing practice among professional accountants worldwide. The aims for assurance articulated in the 3410N standard are also evident in recent FEE pronouncements.¹³

Hence, since 2005, the programmatic aims articulated for sustainability assurance have coalesced around a suite of objectives focused on delivering accountability to stakeholders by paying central attention to assessments of the completeness, relevance and reliability of information in sustainability reports. These represent broad and supposedly desirable goals which emerging assurance technologies should be designed to serve.

Programmatic aims articulated by JIF and TRU

The programmatic objectives for assurance outlined above are largely consistent with those advanced in assurance-related documentation publicly circulated by the two firms studied in this paper (JIF and TRU). Both firms publicly refer to the core contribution sustainability assurance can make to organisational accountability and to the credibility users can glean from information that has been assured – especially regarding its relevance and reliability. JIF claim that an assurance provider has a 'duty' to assess the completeness of a sustainability report – i.e. whether the important issues are addressed in the report, regardless of whether they are strictly required by rules and regulations. Moreover, JIF indicates that AA1000AS helps them to achieve this objective in several of its engagements by paying particular attention to assessments of materiality, completeness and responsiveness. TRU also state that assurors can and should provide assurance not only on the accuracy but also on the completeness of reported data to enable more 'meaningful' accountability to stakeholders. It

¹³ For example, in a recent roundtable discussion on sustainability assurance, FEE concluded that sustainability assurance aimed to place core attention on the *completeness* and *relevance* of reporting for stakeholders. In a recent letter to Richard Howitt of the European Parliament subsequent to the aforementioned roundtable, FEE indicated the need for assurance as it would help ensure that organisations were more transparent and credible in their relations with *all* stakeholders.

emphasises its commitment to assessing reporting completeness by insisting that the whole of a sustainability report should be included in the scope of any assurance engagement. JIF emphasises that accounting firms are the ideal providers of sustainability assurance given their training in assurance methodology and their need to adhere to professional standards. This, it claims, avoids the risk of using ‘inferior quality work’ as the basis for claims that cannot be substantiated. Both firms also highlight the potential for multi-disciplinary practitioners to seamlessly work together to achieve these aims.

CASE CONTEXT

This study was conducted in two Big 4 professional service firms, code-named JIF and TRU, who operate within the same national context and are headquartered in the same city. This national context has been a world leader in both the development of sustainability reporting and associated assurance over the past fifteen years. Both firms have a range of national and multinational sustainability assurance clients having significantly expanded their provision of sustainability assurance in the past four years. JIF is the more established practice and was widely recognised as an initial thought leader in the development of sustainability assurance worldwide. It has provided assurance on sustainability reports for approximately twelve years on a range of multinational clients headquartered in its home country and is the recognised market leader in this context. TRU has been involved in assurance for just over half of this period but has gained increasing market share since 2006 and now has a number of multinational clients. It is also establishing a more prominent role for itself as a thought leader in sustainability assurance. Sustainability assurance practitioners in both firms operate within wider sustainability divisions that also focus on providing a range of advisory services on sustainability. Partners in both firms have had prominent roles in the development of international firm-wide practices.

The current assurance team in JIF was established when a number of sustainability assurance and advisory practitioners joined the practice from another professional services firm’s equivalent division in the late 1990s¹⁴. This division was led by a key player in the accountancy profession involved in the development of sustainability accounting and assurance in Europe (he had left JIF at the time this research project commenced). The new group helped develop a more stand-alone sustainability division in JIF and integrated existing non-accountant assurance staff into this division. The initial chair of JIF’s global sustainability division was also a partner in the JIF office studied and the majority of assurers were non-accountants. During the research period he retired and was replaced by a partner with a financial audit background who now leads the sustainability division. There is a clear separation of sustainability assurance from financial audit within JIF and while financial auditors work on many engagements, dedicated sustainability assurance practitioners are more common.

TRU’s assurance practice also sits in its ‘sustainability division’ which also provides a range of other advisory services to clients. Assurance practice has emerged gradually within client contexts where advisory services related to sustainability predominated. The vast majority of TRU’s sustainability assurance clients are also financial audit clients meaning that financial audit partners also act as the lead partners on sustainability engagements; a situation that is not common in JIF. As a result financial audit has had a more significant influence on the

¹⁴ This other firm was not TRU.

evolution of sustainability assurance in JIF. The division employs twenty-five people with most working on sustainability advisory services. Four individuals at manager/ senior level work exclusively in sustainability assurance with other individuals in the division engaging in assurance in conjunction with other advisory roles. Financial auditors are also assigned to the division for one or two days a week and most work on assurance engagements but are not part of the core staff of the division. TRU encourage a mix of financial auditor and dedicated sustainability assurance expertise on all engagements. The senior partner in the division, who is not a financial auditor, oversees all sustainability division work but all other lead partners on sustainability assurance engagements come from financial audit.

RESEARCH METHODS

The Big 4 professional services firms JIF and TRU were specifically selected for this study given their market leadership in sustainability assurance both worldwide and in the national context studied. The respective reputation of their offices has grown over a number of years and, as noted above, they are both recognised as thought leaders in sustainability assurance in the national context studied. Public comment and guidance on sustainability assurance emanates regularly from both offices on behalf of the global firms of which they form part.

Contact with JIF was established through a senior partner who was known professionally by the author. In response to a request to study the emergence of sustainability assurance in JIF a formal meeting was held between the author and two senior JIF partners: the head of the assurance quality review department and the head of the Sustainability Section. A rough framework for the study was proposed by the researcher at this meeting and a follow up meeting with both partners was held to discuss the proposal in more depth. This meeting also included the other senior partner in the Sustainability Section at this time. Subsequently, a more detailed formal proposal was sent to the lead partner in the Sustainability Section and after some further discussion via email this partner agreed that key SAT staff should participate in the study. All interviewees were then selected and contacted by the author with all requests for interviews eliciting a positive response. Contact with TRU was initiated through two post-graduate students who were completing internships within TRU as well as through email requests sent to a senior director and senior associate requesting access and interviews, all of which received prompt and positive responses.

The data analysed for the study was collected from numerous sources. These included the two aforementioned initial in-depth joint interviews with the senior partners in JIF, twenty-two separate in-depth interviews held with all twelve members of the JIF Sustainability Section directly engaged in sustainability assurance¹⁵ (see Table 1) and thirteen interviews with the five key individuals engaged in sustainability assurance in TRU. The JIF interviewees comprised senior partners (three), managers (six), and seniors/semi-seniors (three). Only two interviewees, both senior partners, had training in financial auditing (heretofore labelled 'accountants'); the assurance quality review partner and the head of the sustainability section. The remaining interviewees had prior backgrounds encompassing areas such as environmental management, environmental economics and cultural anthropology. The TRU interviewees comprised a senior director, senior associate, manager, senior and senior partner in its sustainability section. Two of these five interviewees had training in financial auditing while the remainder comprised business ethicists and so-called sustainability experts.

¹⁵ This included one individual who had recently ceased undertaking assurance engagements.

Insert Tables 1 and 2 about here

All TRU and JIF publications relating to social and environmental assurance were also analysed. These comprised copies of presentations to clients relaying the assurance process (JIF), publications commenting on extant social and environmental assurance standards (often referred to as ‘sustainability assurance standards’) (JIF and TRU), social and environmental (or ‘sustainable development’) strategy overviews for clients¹⁶ (JIF), contributions by interviewees to ‘regulated’ internet blogs on social and environmental assurance¹⁷ (JIF), and publications issued subsequent to the interviews outlining both firms’ approach to and perspectives on sustainability assurance (JIF and TRU). The author also attended the launch of one publication and a related event hosted by JIF where developments in social and environmental assurance practice were debated with other practitioners, company representatives, academics and NGOs. While access to the assurance files of both firms was requested, this was denied given the perceived sensitivity of the specific client data included therein. However, TRU did allow a supervised viewing, lasting approximately 35 minutes, of their emerging assurance methodology template that was being introduced to structure assurance engagements.

All interviews lasted from 35 minutes to two hours. For JIF, they took place over the period December 2005 to July 2009. Interviewing in TRU did not commence until April 2008 and ended in May 2009 given its later emergence into the sustainability assurance market. All interviewees were sent a list of broad open ended questions in advance of their interview encouraging them to discuss their experiences of and views on sustainability assurance practice both generally and specifically within their firms. All interviews, apart from the two initial joint interviews with partners in JIF, were recorded, with permission, on an MP3 player and subsequently fully transcribed. Detailed notes were taken throughout each interview, and after each interview finished, reflections and issues for probing in future interviews were recorded on the MP3 player and/or written down in a separate journal.

The transcribed interviews were analysed using three sub processes: data reduction; data display; and conclusion drawing/verification (Huberman & Miles, 1994; Irvine & Gaffikin, 2006; King, 1998; O’Dwyer, 2004). The analysis initially separated the TRU and JIF interview data¹⁸. A detailed reading of all transcripts and accompanying notes and tape-recorded reflections on interviews led to the identification of numerous key themes within each set of interviews related to the construction of assurance in both firms. A summary table was then prepared for each transcript which highlighted themes focused on the construction of assurance, explained the nature of the themes, and their location within each transcript. Subsequent readings of the transcripts added to these themes and reading of Power’s (1999)

¹⁶ These are advisory documents which indicate how clients might incorporate social and environmental issues into the overall strategy. They often advise on the instigation of stakeholder engagement processes and how social and environmental considerations can be incorporated into issues such as supply chain management in order to ‘add value’ for clients.

¹⁷ These were internet blogs facilitated by the organisation *AccountAbility* on its website (www.accountability21.net). These blogs formed part of the development of a revision of *AccountAbility’s* social and environmental assurance standard, AA1000. Certain JIF Sustainability Section managers contributed their views on social and environmental assurance to these blogs.

¹⁸ A separate paper was also prepared from the JIF data analysis (see O’Dwyer et al., 2009). This draws on aspects of the JIF data with a distinct analytical and empirical focus from this paper illuminating the processes through which practitioners in JIF have sought legitimacy for sustainability assurance with internal and external audiences.

and Radcliffe's (1999) aforementioned work furthered focused the analysis. Repeated analysis was undertaken until some sense of saturation of the issues identified by interviewees related to the construction of assurance practice was reached. This analysis was then considered in conjunction with emerging public documentation on assurance produced by JIF and TRU. Repeated interaction between literature and data was undertaken over a 10 month period to derive the narrative presented in the next section.

CASE FINDINGS

This section presents and analyses the case findings. The first section reveals the nature of assurers' commitment to the programmatic ideals widely espoused for sustainability assurance as these ideals are likely to influence how assurers come to construct assurance practice (Pentland, 2000). The second section explores the initial complexities involved in constructing assurance practice in the context of diverse, vague, disconnected data, particularly the inherent difficulties involved in assessing reporting completeness, a core programmatic ideal assigned to assurance. The various formal and informal technologies enrolled by assurers to deal with these complexities are then examined in depth. The next section illustrates how the distinct habits, routines and interpretive schemes of 'accountants' (trained financial auditors) and 'non-accountants' (other assurers not trained in financial audit) have clashed as efforts to construct practice have evolved thereby triggering tensions in the development of assurance approaches. Given the aforementioned struggles, attempts by both firms to structure emerging often *ad hoc* practices in broad methodological shells are subsequently unveiled but are shown to have had little impact on actual practice on the ground. The final section illustrates how both firms have come to publicly recognise the limitations of traditional financial audit techniques in fulfilling the key programmatic ideal of assessing reporting completeness while simultaneously suggesting a solution which enrolls stakeholders into the reporting and assurance process.

Aligning the programmatic and the technological – Assurer espoused ambitions for assurance

Throughout their reflections on their experiences of practice, semi-seniors, seniors, associates and managers in both firms, particularly non-accountants, emphasised their personal and professional commitment to holding companies to account on behalf of wider stakeholder groups. Senior partners, however, while emphasising their professional responsibility to stakeholders/readers viewed their role in more dispassionate terms and were less inclined to link their professional and personal motivations.

Several non-accountant managers insisted that they were "working for the readers" (TB¹⁹) of sustainability reports and claimed that their admittedly "idealistic view of sustainability" (JI) reflected both a personal and professional commitment to "selling sustainability as a concept centred on a core concern for stakeholders" (JI). One JIF senior indicated that his career choice was motivated by a desire to "help and create change in society and to have a little role in making business more accountable for their impacts and therefore more sustainable" (JD). He felt that sustainability assurance could help ensure that companies "filled a broader role within the context of what society expected of them" (JD). A JIF senior manager's apparently "extreme" (JA) commitment to a stakeholder-oriented view of assurance actually resulted in

¹⁹ See interviewee codes in Tables 1 and 2.

him being “sidelined” (JA) in one assurance assignment as senior partners considered him overly critical of the quality of a client’s stakeholder engagement process.

Given that sustainability reporting and supporting information systems were often not heavily embedded in many organisations, for many non-accountant managers and seniors this meant that emerging assurance practice necessarily embraced “a natural advisory element” (TC) which was often reflected in recommendations in assurance statements aimed at improving internal systems:

I think ... it is quite logical to approach assurance from an advisory perspective ... This is a very advice oriented market and it is also my personal ambition to also provide advice where I can. Of course you do assurance, so you do it from the perspective of an independent assurance provider, but in the process of doing this assurance you are also the natural advisers to the client, and you help the client by providing best practices, by giving second opinions and showing them different ways of organising their reporting process. That is very important, because that is really what clients pay for. They do not pay for the final signature. They want to make sure that they have a report that adds value to their stakeholders and so do I ... You could say that it’s not your job as assurance provider, but from a market point of view, I think that clients really do expect this from us. (TC)

While this advisory focus allowed assurors to encourage changes in organisations focused on providing more relevant and reliable information for stakeholders, it also potentially undermined their independence. However, interviewees at all levels in both firms were highly sensitive to and dismissive of these potential independence concerns. Managers emphasised the distinction between advice and implementation while senior partners and associates referred to their required compliance with ethical guidance from the accounting profession – something which was also seen as an effective marketing strategy central to increasing both firms’ external credibility in the sustainability assurance market:

Looking at it from a personal perspective and the way I deal with assurance, I don’t see any tension between these two [assurance and advice]. I can be very clear to the client and I always do so because otherwise you get into trouble talking about ‘listen, this is for you to improve, this is assurance’. And clients appreciate that. (JE)

We always advise them but do not implement and that’s the big difference of course. We say ‘well this is not good enough, you could see improvements in these areas’ and well it’s for the company to then decide whether they agree with us or not. (JD)

Independence is not really a problem because we have been made so aware of the importance of ensuring that [TRU] doesn’t get a bad name that we are pretty serious with the client. I mean, you can still have a good relationship with your client and besides answering all the questions about the assurance process you can still be an expert. You can still say things like ‘you should have a look at that report’, or, ‘have a look at that website’, or, ‘I’ll send you a link with 3 perspectives, see if you can do something with them’, that kind of thing. We are not going to recommend a business control manual. But we give them maybe 3 good examples or we give a second opinion on what they have put together or we join them in a brainstorming session. (TB)

Struggling with and struggling for assurance technologies

The above conflation of personal and professional ambitions for assurance among non-accountant assurers in particular exhibited a commitment to realising key programmatic aims of reporting completeness and inclusivity thereby hinting at assurance environments with enhanced possibilities for coupling the programmatic and technological elements of assurance. However, in spite of these commitments, the key programmatic possibilities of assurance – “the hopes [for stakeholder accountability] invested in practice” (Power, 1999, p. 4) – have proved difficult for assurers in both firms to realise. These difficulties were especially evident in assurers’ concerns about the availability and reliability of technologies capable of confronting the challenges of assuring diverse, vague and disconnected data in sustainability reports.

Coping with diverse, vague and disconnected data

The development of technologies providing assurers with specific mechanisms to tackle data in sustainability reports has evolved in a random manner in both firms. More experienced assurers, particularly in JIF, revealed how documentation of processes and procedures in the early years of assurance was minimal as assurers struggled to develop appropriate testing procedures. They were “going into unknown ground” (JB) and experiencing “heightened levels of uncertainty” (JA) given an almost complete absence of formal internal or external guidance. Certain seniors and managers claimed that this uncertainty initially led to ‘over auditing’ given the lack of uniform assurance approaches and insufficient knowledge of sampling procedures:

When it comes to documenting and having an electronic file which is up to standard, we have come a long way. I know how I was struggling with the [name of large client] file, because that was really my first experience with a major sustainability assurance engagement and I did not really understand what had to be done and there were no accepted standards or guidance ... The practical aspects of documentation were actually the most challenging to learn and master. This is not to say that the work we performed in the first couple of years was not up to standard, but it was just not up to our current standard. (TB)

Starting off, we weren’t really sure what to do actually, especially on early assignments and strangely enough our reaction was, in many cases, to overdo it, by requesting a lot of documentation and support without relying on samples as much as we do now. Much of it was seat of the pants stuff so we tried to cover ourselves as much as possible without annoying clients too much. (TC)

Certain textual claims in reports caused particular problems as “excessive reliance on professional judgement” (TD), rarely backed by extensive prior experience, necessarily drove assessments of this data. For example, claims by companies to have implemented codes of conduct required not merely identifying the existence of codes but also developing reliable processes to gain assurance that implementation was actually taking place company-wide. This involved local site visits to assess if employees were aware of codes and whether they had seen and read code manuals. However, many assurers claimed that site selection rarely followed consistent sampling criteria while conclusions were often based on “hunches” drawn from extensive observation and interviews. Moreover, companies were prone to using vaguely defined terms in their reports, a situation senior partners and associates in both firms contrasted with the relative uniformity of financial reporting data. The TRU manager, for example, recounted a company claiming that they had ‘implemented human rights policies’

without any further clarification or support. He relayed his efforts to establish agreed definitions of terms like 'human rights' and 'policies' and to develop assurance procedures tailored at assessing 'implementation' in the context of these definitions. While bemoaning the lack of guidance he emphasised that this was just one example of many where tests had to be continuously constructed given the varying nature of the data assurors were confronted with.

The senior partners and director with financial audit backgrounds contrasted the relatively complex nature of sustainability data with financial accounting data. The lack of linkage in social and environmental data posed significant problems when assessing reporting completeness. Standard financial audit technologies using compliance testing procedures struggled to cope with this lack of linkage given the stand alone nature of sustainability report data thereby providing an inadequate benchmark for emerging practice. This lack of linkage was also compounded by the rather rudimentary data collection systems some companies employed, which were often based on poorly controlled *Microsoft Excel* files:

With financial accounting information all the data is linked together so there is always a link with another piece of information. If you look at financial audit where you have completeness of purchases, it is easy in the sense that you have purchases and sales and you can relate them to one another, you have all your processes and systems. You will see issues in your margins if the purchases aren't complete. (JB)

Most of the time there are no good systems for sustainability reporting. You have to realise that most of the companies collect and analyse their data in excel-sheets, these are e-mailed from one country to the head office and at the head office the data is consolidated. This does not necessarily mean it is wrong, but it is very different compared to a screened system. There are often no procedures that specify which data is reported, where to look next to or how to compare the data with last year. The whole control environment is different in this world and that is the biggest challenge. (TA)

CO2 emissions are primarily focused on trying to report lower emissions or lower accident rates but ... it is stand-alone information and you often have little to relate it to if the systems are poor ... There is also less scope for substantive testing as there is no invoice or signature like in a purchase (JB).

The nature of some reported data also meant that examining internal control processes proved particularly challenging. For example, when assuring on safety incident reporting some managers claimed that they also needed to assess a company's culture especially the nature of its reactions to incidents, which "involve[d] huge amounts of hunch and judgement" (JB) as well as on-site presence. Year to year data trends could also pose significant problems as comparability was complicated by companies constantly changing their measurement methodologies without explanation and reporting comparative figures such as CO2 emissions derived from different methodologies. Assurors had to take great care to ensure consistency in methodologies when assessing trends and this had led to frictions with some clients:

You had situations where increased measurement resulted in what appeared to be a decrease in emissions ... If we had a measurement estimate which was very inaccurate, you had a measurement two years later, which was much more accurate and it's 'oh our emissions are only this much and we're showing a graph like this'. And I said 'no, the emissions weren't in your file two years ago, you've

just changed your methodology’. So again, they would have to alter the notes in the packs, the notes to the graphs, to indicate that that decrease was you know, as a result of the change of methodology. (JH)

Complexities surrounding assessing reporting completeness

These operational challenges became particularly acute when assurors attempted to assess reporting completeness. Completeness assessments were widely seen as a “very grey area” (JA) replete with frustrations associated with developing not only feasible, defensible formal technologies *per se* but also *economically* realistic ones. The expansion of reporting to encompass social as well as environmental issues often meant that more site visits were required within tight budgetary constraints while the absence of sufficient expertise in other national offices meant that direct site visits were often required by TRU and JIF staff thereby driving up costs:

A country with large emissions might not be the country you want to look at for human rights, so you end up with a very difficult balancing act once you spread to assuring on social issues. (JA)

With sustainability assurance most of the work is done by us. This is because people in [TRU] in, for example, India are not aware of sustainability. And even in Belgium, if that office is less engaged with sustainability issues then it is difficult to let them do the work. (TA)

The often ambiguous, non-uniform criteria for site selection, particularly by non-accountant assurors who had limited knowledge of sampling procedures, proved especially frustrating for partners, managers and seniors as many competitors were perceived as undertaking much less assurance work. While other techniques such as internet searches, peer review processes, media analyses and liaison with financial auditors were mobilised to assess reporting completeness, a number of managers and seniors complained that they were too often unsure as to the extent of reliance they could place on them. Hence, they relied significantly on their limited tacit knowledge, engaging in what some managers and associates saw as “too much interpretation” (TB) driven by gut instinct; a situation compounded by a perceived lack of clear standards:

I mean in some cases assessments can be very personal, you actually feel personally that something should be included in the report but you don’t have any evidence to substantiate it so you may mention it face-to-face to the company but not include it in your assurance report. But it is really subjective and you rely a lot on gut instinct especially with regard to assessing completeness of disclosures on supply chain issues. (JC)

Assurance on completeness is vague because the regulations and standards are not that clear that they can serve as a grip. They don’t tell you exactly where to look, what to do exactly or how to handle things in practice. There is so much room for interpretation. (TB)

The absence of guidance as to what level and type of work was required to support so-called limited or moderate opinions on reports was a particular frustration for several senior partners, directors and associates. A senior manager in JIF complained that while he was “irritated” by the fact that he had little guidance on “what we needed to go to a higher level of assurance”

(JE)), what was worse was that he “found it most embarrassing that [he] could not explain it to his client[s]” (JE).

To be honest, what is moderate? What is moderate level assurance, how much do we have to do in a CO2 or in a human rights environment to get a moderate level of assurance? It is very vague what the differences are between the levels of assurance. (JC)

What is limited assurance? Well you can do nothing and you still give limited assurance. If you look at the wording of the [limited opinion] conclusion, you can do only some work at the corporate level and then still only provide limited assurance. (JB)

This perceived “obscurity of the cost-assurance function” (Power, 1997a, p. 38) – the link between levels of assurance and the cost of work to be done - heightened the ambiguity and uncertainty pervading practice and sometimes placed assurors in what Power (1997a, p. 38) terms an essentially unknowable situation:

I have to say that there is a general concern about whether we are capable of auditing the really important information and the really important issues. This is, at the moment, irresolvable because no-one has the answer. (JB)

Completeness assessments were further complicated as assurance scope and related site selection decisions could be highly political in character given some company management concerns to restrict scope and eliminate certain areas from inquiry. For example, management often only wanted assurance on areas where they could indicate positive performance; hence, the aforementioned importance of carefully assessing data trends. This political aspect of assessing completeness was a central concern for the senior partners, director and associate interviewed given that the capacity for emerging practice to deliver on its key aim of assessing reporting completeness was potentially compromised.

A key factor exacerbating these perceived problems with assessing reporting completeness was the widespread perception that, despite much public rhetoric, client stakeholder engagement processes were often poorly developed. Several senior partners, seniors and managers suggested it was a key challenge for future assurance practice if assurors were to be able to adequately assess reporting completeness and relevance:

I am surprised and disappointed that many companies do not divert their attention more to stakeholders. Their reports are always written from the inside out and not from the outside in. (JJ)

Companies are not checking with the outside world ‘what do you want to have assured and to what level? What’s your real concern with our report?’ They need to do more with stakeholders and find out their needs or at least try to find out. (TD)

Moreover, even where stakeholder engagement processes existed, assurors bemoaned the lack of guidance on the procedures necessary to audit them. Several interviewees complained that “ISAE 3000 only refer[red] to stakeholder engagement in one sentence” (JG) while AA1000AS was widely condemned for being much too broad and aspirational to reliably guide practice on the ground. Its stakeholder focus was also only “good and fine if you had

decent levels of stakeholder engagement by companies” (TA), a situation that, according to one JIF interviewee, applied to “only one per cent of clients” (JE):

I do not trust standards like AA1000 and ISAE3000 because I have been listening to talks and discussions around such standards for years now and I haven’t seen anything that I can use in practice. Given the poor stakeholder engagement practices of a lot of our clients, while it is important to take into account the stakeholder view in general it is proving difficult to make it a framework for conducting assurance ... at least it doesn’t work for us. (JE)

Co-ordinating practice - harnessing accountants’ and non-accountants’ habits, routines and interpretive schemes

The practical challenges above have been exacerbated by the need to harness the mindsets of non-accountant assurers and traditional financial auditors within both firms. As noted earlier, both TRU and JIF’s promotional documentation on assurance and the standards and calls for action from the professional accounting bodies emphasise the necessity and desirability of mobilising multi-disciplinary teams. However, co-ordinating multidisciplinary practice is not always straightforward (Power, 1997) and has posed numerous challenges for assurers in both firms.

As outlined earlier, a number of non-accountant assurers with significant prior experience of assurance on *environmental* reporting joined JIF from another large professional services firm. The existing financial auditors in JIF had ‘ownership’ of one large sustainability assurance client (PMP) and the newly-arrived non-accountant assurers brought other key clients with them and expanded the assurance market significantly over the ensuing years. Initially, distinct approaches to assurance became evident with several ‘non-accountant’ assurers interviewed expressing discomfort at the limited assurance approach adopted by PMP’s ‘accountant’ assurance team. According to them, the financial auditors were too timid as their engagements only focused on assessing key numerical indicators determined by PMP which were more amenable to conventional substantive testing procedures aimed at assessing data accuracy:

[PMP] is a different story as it is actually been done by [JIF] accountants and is not a ‘real’ sustainability assurance engagement (JD)

Hence, when accountants and non-accountants in JIF eventually commenced working together on assignments, distinct and sometimes incompatible mindsets, routines and interpretive schemes surrounding assurance practice emerged. These distinctions were particularly apparent in non-accountant assurer perceptions of the way in which financial auditors approached the judgement of data, which was heavily influenced by what some non-accountants saw as “a structured, inflexible mentality” (JI). Indeed, financial auditors in both firms were accused of overly relying on established financial audit technologies, such as standard testing procedures and constrained ways of thinking about data, which non-accountant seniors, managers and associates viewed as inappropriate. For example, one JIF senior manager complained that financial auditors “had insufficient knowledge of the subject matter in reports to judge the work of experts” (JA) and gave insufficient attention to the complexity of the context within which data was created. Competing accountant-non-accountant conceptions of materiality caused particular frustration with non-accountants defending the importance of assessments “of stakeholder materiality or completeness” which they claimed “financial audit guidance d[id] not handle well” (TD).

I've seen accountants put lines of figures from one year and the next year and do a comparison and come up with [a conclusion] 'well this is material because there's been a 100 per cent change' and I've said 'yes but that's an entity that had two accidents last year and it had four this year and you're saying that it's material because it's a 100 per cent change' ... I said 'you've got 20 entities in developing countries that have reported zero both years and you're saying they're not material. It doesn't strike you that they might not actually have any systems in place to record this information locally or systems might have changed in both years?' So it's a completely different attitude. If you just give an accountant a list of figures and say 'you know, you do your site selection based on these figures' they come up with all the wrong selections. (JA)

Materiality is totally different in sustainability reporting than in financial reporting. [Name of client], for example, may look at how many accidents have happened in its work force. An accountant would say we have five per cent materiality meaning 800,000 multiplied by 0.05 equals 40,000 people and we would be told that there is no problem. But in the real world when [name of client] has one heavily injured employee this would cause great problems. Moreover, if we do assurance on fatalities, we are not going to say that the materiality levels are 5 per cent of overall fatalities based on historical data. Every fatality is material. However, this is something we have many debates on with our financial assurance colleagues. (TB)

For most non-accountant assurers, evaluating social and environmental data, especially its completeness, was unavoidably subjective and reliant on informal, contextually grounded, judgemental assessments based on knowledge accumulated over time. The ability to apply this tacit knowledge, however problematic and uncertain, was what made sustainability assurance compelling and challenging for them and represented an essential technological resource facilitating its tractability. Financial auditors were also accused of being reluctant to go "into the field" (TC) to assess the processes driving reported data thereby placing too much emphasis on assessing data received directly from clients using traditional substantive testing. This was especially apparent when assessing claims related to the integration of so-called 'values' in organisations, which involved greater "subtlety and risk" (JJ) and "on-site presence" (JA) than distanced evaluations of quantitative data produced by clients.

The senior partners in JIF and TRU with accounting backgrounds acknowledged many of these tensions but defended the need for an audit approach that sought more focus and certainty in testing as well as greater conformity in overall approaches to assurance within both firms. The financial audit senior in TRU (TD) acknowledged that she had a very different mindset and was somewhat taken aback by the level of knowledge and commitment displayed by some of her non-accountant colleagues. However, she insisted that financial auditors brought greater organisation and structure to engagements and were more realistic about the extent to which issues surrounding completeness could be reliably assessed. She also claimed that financial auditors were at a disadvantage as they were working on both financial and non-financial assurance engagements and it was natural that they should bring the customs and habits of financial audit to sustainability assurance. Moreover, while non-accountant assurers often felt that assurance and advice could easily overlap, her training had taught her to be wary of any such possibility.

Within TRU, financial auditors initially led the development of practice but as with JIF, this was initially consigned to limited assessments of data accuracy within environmental reports. As engagements developed and reports evolved to encompass *both* environmental and social data involving greater textual, so-called ‘softer’ content, ‘advisors’ from the sustainability division were drafted onto assurance teams and assigned to provide assurance on data such as text and company claims which financial auditors felt less comfortable assuring. Gradually these individuals took over the management of these engagements (particularly interviewees TB and TC) but despite this, they complained that assurance work often remained too narrowly focused on data accuracy given the influence of lead financial audit partners. Consequently, in TRU more so than in JIF, financial auditors remained the “legitimate orchestrators” of assurance practice despite their lack of comparative ‘expert’ knowledge of the field. The non-accountant assurers (TB and TC) were, however, highly assertive and claimed that they constantly challenged financial auditors’ work. For example, when faced with assuring text that had been directly copied from annual reports into sustainability reports, they emphasised *their* need to audit this text, often to the annoyance of clients and financial audit lead partners who claimed that as the text had already been reviewed by TRU’s financial auditors, this was unnecessary:

Just recently I was in a situation where I did the audit of a sustainability report for a client who is also an accountancy client for us, and this particular company had copied complete chapters from their annual report into their sustainability report. In those chapters the company made quite substantial claims like ‘we are the best’ and things like that. We would challenge that. We would require some supporting evidence for claims like that, while the financial auditor would already have signed off on the [annual] report and not asked any questions on the text. What they do is simply read it and make sure that there is nothing contradictory to the annual financial statements. This client just could not understand what we were doing, while I think for a sustainability practitioner it is quite obvious that if you say in a report that you, for instance, visit your suppliers, even as simply as that, if you just say we visit our suppliers, you are implying that you do all sorts of monitoring on human rights issues, child labour, so you simply cannot say that unless you specify what it is that you are doing and to what extent. (TB)

‘Investing’ in due process and standardisation - Structuring judgement using financial audit methodologies

The initial response to the concerns above was a move on the part of the senior partner hierarchy in both firms to structure and formalise assurance practice more coherently so that judgements could be made within a framework suggesting consistency and cohesiveness. These efforts to create the appearance of bureaucratically rational practices were also aimed at making sustainability assurance practice more controllable and defensible, particularly from a risk management/quality control perspective and largely relied on enrolling broad overarching features of financial audit methodologies with an increased focus on documentation of testing.

Greater formalisation and agreed levels of documentation were gradually introduced in TRU to structure emerging assurance practice, particularly as too much knowledge was perceived as residing in non-accountant assurers’ heads and could easily be lost to competitors if staff departed. While feeling powerless to prevent this ‘boxing’ of sustainability assurance in a largely financial audit frame, TRU’s senior associate and manager admitted to initial

discomfort with this approach as they felt expedience was being prioritised in favour of investing in developing more relevant, focused techniques:

I would say [TRU] should think the whole process over from the start, instead of just trying to make quick copies of what is already there. (TC)

The normal [financial] audit approach is used more and more for the sustainability assurance. From one side this is good. There is about 150 years of thinking about it and that is robust. From the other side, we need to keep seeing it [sustainability assurance] as something innovative, because non-financial assurance is still very different. Therefore, you need to be able to let go some things from the past, because it [sustainability assurance] can simply be done better or differently using new techniques and knowledge which often only evolve over time. (TD)

In effect, the set of *ad hoc* procedures developed instinctively by TRU's non-accountant assurers was cloaked in a financial audit 'shell' with many of the aforementioned practical concerns surrounding assessing reporting completeness remaining unresolved. While broad overarching audit steps such as engagement acceptance, planning, risk assessment, and quality review partner sign-off were incorporated into TRU's framework, it provided little guidance on the detailed testing required. This was apparently done deliberately as senior partners recognised the limitations of existing financial audit techniques for assessing key client-specific issues requiring negotiation such as stakeholder materiality and reporting completeness. According to the manager, senior associate and senior interviewed, the framework had little substantive impact on the detailed nature of their work. They viewed it as existing mainly to conform to quality control requirements driven by risk management concerns in TRU given the increasing number of sustainability assurance assignments and the increasing amounts of fee income involved:

I would not be able to give you even one example of where we have actually changed our assurance approach as a result of now having this methodology. In fact, the methodology, in its first edition, was the [name of client] working programme, which we upgraded to be the methodology and to be applied also to other sustainability assurance engagements. (TB)

It's not like someone had the idea, right, let's do non-financial assurance, we have to arrange this and that [formally] and after we arrange everything then we will begin. In our case, we just do it, and we have been doing it for 5 to 6 years now. However, after a while, especially with the amount of assignments and fees increasing, someone says, 'hey, what's the story with risk management and hey, how can it be that this engagement letter is not completely the same as the standard one that we send out during the annual report audit?'. (TA)

For TRU's non-accountant manager there was an element of *post-hoc* rationalisation of assurance in the requirement to comply rigidly with the new structure imposed by the methodology:

I understand fully that when we are finished, the database should be in order according to all the framework guidance. But, I just really dislike writing things down like that afterwards to make it look like it's correct, even though in reality it wasn't done like that at all. By doing that we are fooling ourselves really. (TC)

Within JIF, low levels of documentation also characterised the early emergence of assurance practice and it has also gradually moved from this informal approach where “the level of organisation and documentation was limited with lots of information in people’s heads” (JG) to a situation where “the level of formalisation has increased” (JE) consistent with guidance from financial audit methodologies. Managers, seniors and semi-seniors in JIF were now more cautious and conscious and were “covering themselves with documentation” (JC). These assurers, including two of the partners interviewed, highlighted, however, that while greater structure was now provided, the key challenges of sustainability assurance remained; they just appeared less problematic within the ‘rational’ financial audit framework. One senior partner in financial audit felt that this “structuring” merely created an enhanced “appearance of objectivity” (JC) allowing assurers to present a plausible, defensible overarching process without necessarily providing better guidance on how to tackle core issues like reporting completeness.

At the time of the final interviews for this study, JIF had commenced developing a global sustainability assurance methodology aligned with all the key phases in their global financial audit methodology. Consistent with TRU, this process was largely driven by financial auditors but, unlike in TRU, according to the financial audit senior partner leading the process “[non-accountant] assurers will be consulted extensively as they can tell [financial auditors] when a standard technique might not work in the context of a sustainability assurance engagement” (JB). The process will also involve efforts to convince other internal JIF constituents, such as risk management partners in other practices worldwide, of the ability of sustainability assurance to deliver on its key aims without posing undue risks, especially its ability to assure on text in reports. Some assurers remained unconvinced of this with one senior financial audit partner indicating that:

... we have to convince others [other international offices] as to whether we can provide assurance on text, a company story, or on non-financial data like CO2 elements and if we have suitable criteria to provide assurance against .. [but] first, we have to really convince ourselves (JC)

To summarise, broad based financial audit frameworks are being adopted by both firms to provide a standardised structure for practice, much of which has evolved in a rather improvised manner. In TRU in particular, this framework has primarily provided a routinised shell within which assurance practice remains highly judgemental and contingent on particular clients and client-assurer negotiations surrounding engagement scope. Hence, many of the aforementioned assurer concerns about the ability of available practices to adequately achieve key programmatic aims such as assuring on reporting completeness have not been addressed.

Given these persistent difficulties, as the next section will outline, the hierarchy in both firms have now instigated efforts to publicly realign the expectations attached to sustainability assurance as performed by professional accounting firms while simultaneously reinforcing the centrality of their firms’ assurance work within efforts to achieve aims centred on delivering enhanced accountability to stakeholders.

Outsourcing the delivery of key programmatic aims

While many of the assurers, particularly non-accountants, displayed a commitment to realising programmatic aims aligned around stakeholder accountability and associated

reporting completeness, the uncertainties, ambiguities and tensions within emerging practice clearly indicate that the technologies enrolled have struggled to operationalise aspects of these ideals. Given these operational problems, the senior partners in the sustainability divisions of both firms have recently moved to publicly reframe the expectations accorded to their assurance practices. While remaining committed to core programmatic aims such as assuring on reporting completeness, both firms now argue that these aims can only be realised if ‘accountants’ standard (financial audit) assurance procedures are used *in conjunction with* assessments by external ‘expert’ stakeholder groups. These proposals shift a key part of the responsibility for assessing reporting completeness away from assurers on to so-called stakeholder panels with both firms asserting that this will allow them to concentrate on their core competencies derived from financial audit, focused especially on assessing the *accuracy* of reported data.

Enrolling the stakeholder – stakeholder panels as assurance technologies

JIF have publicly suggested that panels of sustainability report users, complemented with ‘experts’ if necessary, could initially identify stakeholder information needs and assist assurers in ensuring that reports address all stakeholder relevant information. These panels could, they argue, also determine, in consultation with the reporting company, which aspects of a sustainability report they would like to see assured as well as the level of assurance required on selected issues. The proposals aim to eliminate some of the key judgemental, contentious or, according to many of our non-accountant interviewees, “interesting” (JL) areas from JIF’s assurance process which are central to assessing stakeholder accountability. Moreover, JIF infer that they can now only assure on the *reliability* of sustainability report information thereby inferring a rather more limited role for their assurance process.

TRU largely concur with JIF’s perspective and have advocated for what they term ‘dual assurance’ which also views stakeholder panels having both advisory *and* assurance functions, consistent with how the TRU non-accountant assurers (TB and TC) viewed their roles. TRU claim that their perspective is motivated by a desire to ensure that “audit firms” (professional accounting firms) do not stray too far from their supposed roots in *assurance procedures, objective facts and audit evidence*. Like JIF, they also assert that “audit firms” should primarily focus on assessing the *reliability* of performance data. This would involve issuing an opinion on whether companies are reporting things correctly by providing assurance on their materiality *processes* and performing traditional audit work on their reported performance data. Stakeholder panels comprising diverse stakeholder representatives *selected by the company and trained by TRU* on the standards used by TRU would advise and assess whether a company is reporting on the *relevant* issues – a central programmatic aim for sustainability assurance but also, as we have seen, one of the most pragmatically problematic aspects of practice to date. These panels would also apparently allow for positive comments on sustainability *performance* which “audit firms” like TRU cannot provide as, according to TRU, they need to “be objective and independent and *stick to the facts*”. This “connecting” of assurers and stakeholder panels will, according to TRU, “create *efficiency* and synergy” in assurance processes:

I am very excited about this new form of evaluating sustainability reports. We believe that this will be the future of sustainability reporting and assurance; a cooperation between accountants and stakeholders. The accountant judges the report on the hard facts whereas the stakeholder panels look at the ambition and other ‘emotions’ in the report. (TE)

The senior partner quoted above felt that this shift could herald the beginning of an era whereby a new committee in the governance structure of listed companies would become common and provide a key reference point for assurors on the key issues of reporting relevance and materiality:

I think that, in any case, for companies quoted on the stock exchange, a specific second-tier committee within the governance structure that discusses public affairs will become a commodity in the future ... They can easily tell something about the relevance of items [reported]... We could work together with them whereby the committee provides input for the materiality process of the companies, i.e. determines what issues to report on, and we [the assurance providers] concentrate on the accuracy of the data. (TE)

Nonetheless, in common with the senior director and senior associate in TRU, this partner recognised the credibility risks in seemingly assuming that stakeholders could perform a crucial assurance role. He emphasised the need to accord distinct roles to practitioners and assurors in the assurance process, while the TRU manager expressed concern about the depth of knowledge these panels might possess:

An important note to this use of stakeholder panels is that the opinion of the stakeholder panels can often be seen and referred to as an assurance statement, but the scope and depth of their assignment and work performed is different and generally not covered by any standard. So, it is very important to keep these two separated from each other ... There might be a risk if statements of stakeholder panels start to be used as assurance. (TA)

Stakeholder panels do not know the difference between damage from CO₂ and Methane. They don't have a clue. So accountants do provide a valuable form of assurance where stakeholder panels give their opinion. If certain users do not see the difference between these two then the practice might have high credibility problems. (TC)

Both TRU and JIF publicly present existing financial audit-based practice in its most positive light extolling its ability to assess performance data 'objectively' while also enrolling the ethical frameworks of the accountancy profession to illustrate their firms' commitment to integrity and independence. Existing assurance practice is not presented as a problem; the problem lies with the largely subjective, often incomplete data that needs to be assessed to fulfil the core programmatic aims extolled by both firms and other professional bodies. TRU blame the lack of guidance available to assurors for assessing qualitative information for these practical limitations.

DISCUSSION AND CONCLUSIONS

This paper has sought to develop and deepen our understanding of how assurance practitioners have come to construct sustainability assurance practice. Power's (1999) theorisation of the loosely coupled relationship between the programmatic and operational aspects of audit (see also, Radcliffe, 1999; Curtis and Turley, 2007) is used to provide an analytical frame for the study thereby facilitating a consideration of the way the construction of practice has been aligned with its programmatic aims. The paper responds to continuing calls for researchers to extend examinations of the complex back stage of *new* audit type

practices, particularly those of a discretionary nature (Free et al., 2009) and specifically builds on prior work by Radcliffe (1999) and Free et al. (2009). The study of the relationship between the programmatic ideals of new audit/assurance practices and the stories of their core operational capability allows the paper to trace the means through which programmatic aims held out for new forms of assurance are translated into operational tasks and routines within real-life organizations (Cooper and Robson, 2006) and what the effects and consequences of this translation process might be. This empirically informs and nuances Power's (1999) insights with respect to the export of the 'idea' of audit into domains outside its traditional roots in financial audit and his reflections on the relationship between the programmatic and technological aspects of audit.

The case demonstrates an uneasy and shifting relationship between the operationalisation of sustainability assurance and the realisation of emerging programmatic ideals centered on stakeholder inclusivity and accountability. Embryonic, local discourses and tacit knowledge embedded in highly subjective assessments are revealed as key technological resources adopted to make sustainability assurance possible in the face of vague, largely informal guidance on required practice. These practices have emerged in contexts where non-accountant assurers relayed intense commitments to enabling greater stakeholder accountability to the extent that they viewed assurance as part of a process of instilling change. While the data ambiguity often frustrated non-accountants and fuelled doubt as to whether assurance practice could deliver on its aims, it also energised and challenged them. Emerging, collective agreements among non-accountants as to what constituted reasonable practice in areas such as materiality and completeness assessment were particularly evident in the disdain shown for perceived narrow assurance approaches of financial auditors.

Evidence of a spillover effect from financial audit is apparent in the 'surface' routines imposed on assurers whereby many of the organizational/ procedural aspects of financial audit are now used to establish a sense of *due process*. The moves to structure practice within loose methodological 'shells' derived from financial auditing have apparently formalized practice without necessarily guiding or influencing detailed procedures in the field. Hence, this shift towards structure has facilitated a scripting of sustainability assurance as a rational process (Power, 1995) with the highly judgmental, improvised nature of non-accountants' practice largely persisting albeit in the presence of the more constrained approaches of financial auditors. This structural shell signifies some coherence within assurance practice thereby making it more legitimate with and controllable by the hierarchies in both firms (see also Carpenter, 1994; Curtis and Turley, 2007) and facilitating greater bureaucratic control of practice. As Power (2003) suggests:

Structure is about legitimacy and control, which is not necessarily consistent with better or more efficient auditing. (p.381)

The analysis also exposes the inherent difficulties for assurers involved in transferring traditional audit techniques and mindsets to new assurance arenas particularly when this involves co-coordinating different functional specialities. These difficulties are often underestimated in the claims made for multi-disciplinarity in new assurance arenas (see Power, 1997). The tensions between accountants and non-accountants over approaches to the gathering and assessment of evidence demonstrate how audit/assurance "evidence is not natural, [but] is always relative to the rules of acceptance for particular communities" (Power, 1999, p. 69). The working habits and routines of non-accountants, largely drawing on their tacit knowledge and ongoing 'local' discourses with other non-accountant assurers, were

often seen to be incompatible with the relatively rigid habits and routines of financial auditors. The non-accountants deeper commitment to realizing ambitious programmatic aims centered on assessing reporting completeness amplified these frustrations which were further heightened by the fact that, given the organizational contexts they worked in, financial auditors were the institutionally legitimate orchestrators of assurance work.

The findings empirically inform and nuance Power's (1999, p. 42) contention that assurance practices are continually reassembled to provide the impression of meeting programmatic expectations in new contexts. In light of the operational challenges revealed, both firms have come to publicly acknowledge the technological limitations of traditional financial audit practice in fulfilling the programmatic ideals attached to sustainability assurance. It is evident that the rhetoric of accountability embedded in these ideals has been adopted without sufficient consideration of the availability of appropriate technologies (Pentland, 2000) and it appears that both firms are wary of creating an expectations gap with respect to their own assurance efforts. However, an external 'expert' stakeholder solution is offered that is coupled with existing 'objective' assurance practice based on traditional financial auditing techniques. Core responsibility for delivering on key programmatic aims is therefore assigned outside the 'audit firm' to 'experts' appointed by reporting companies. TRU and JIF therefore accept minimal responsibility for any extension of their existing assurance expertise beyond assessing performance data accuracy, while simultaneously arguing that their practices are an indispensable *part* of any assurance process aimed at fulfilling the wider stakeholder accountability aims accorded to assurance. Consistent with prior extensions into new audit work domains (Power, 2003; Willmott and Sikka, 1995), the appeal of independence as a defining core competence and professional requirement for accountants is also enrolled to bolster this claimed indispensability. A minimal reassembling of traditional financial audit practice is engendered which fully acknowledges the inability of traditional audit practices operating alone to meet the programmatic expectations held out for sustainability assurance. Moreover, despite the claimed technological limitations, both firms have resisted the temptation, evident in the development of environmental auditing, to re-define the aims of sustainability assurance in such a way "as to place [them] close to existing [financial audit] competencies" (Power, 2003, p. 388), instead choosing to offer an external solution that still places traditional financial audit at its core. This strategy also conflicts with the initial attempts of many professional accounting bodies and firms who attempted to dilute the programmatic aims of sustainability assurance (see O'Dwyer and Owen, 2005, 2007).

This simultaneous articulation of the limitations and possibilities of existing assurance practice in both firms resonates with the historically uneasy and shifting relationship between financial audit and the programmatic goal of detecting fraud. While too much attention to fraud detection risked overstating the possibilities of audit, too little attention potentially rendered it valueless (Power, 1999). In this case, recognition of the limitations of conventional audit practice likewise risked undermining the perceived value of the assurance offered by TRU and JIF. Shifting attention from these deficiencies towards the possibilities 'traditional' assurance offered *in conjunction with* stakeholder-based assurance, however, allowed both firms highlight their added value as part of the process as well as reigning in the expectations assigned to their practices operating alone.

There are also further related tensions or risk in the re-orientation of expectations and the enrollment of stakeholders suggested above. While the call to use stakeholders to choose the information on which they require assurance ambitiously accords with Elliott's (2002) perspective on the future of 21st century assurance and contrasts with O'Dwyer and Owen's

(2005) assessment of stakeholder involvement in Big 4 assurance in the early to mid 1990s, the use of stakeholder panels to provide explicit assurance on the completeness of information potentially pushes accountants back to a data checking role primarily aimed at assessing the accuracy of reported information. This may serve to question the added value of accountants in this arena and, from the evidence in this study, may actually cloud the extent of available expertise and the level of assurance work that many assurers in these firms are capable of. It risks the departure of many dedicated non-accountant assurers to competing consultancies in search of more challenging work.

Moreover, while suggesting the enrolment of stakeholders, TRU and JIF offer little evidence as to how stakeholders might possess the expertise to more easily perform assurance tasks in the absence of clear guidance. Whether stakeholder groups would have an interest in this work and how they would be selected are also issues that remain unconsidered which may lead to speculation that both firms are *unwilling* to evaluate qualitative information given the perceived risks involved, as opposed to being unable to do so.

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Table 1: JIF Interviewee details

Interviewee	'Accountant' # Yes/No	Position in JIF's Sustainability Division	Date of interview(s)	Interview duration (minutes)
JA	No	Senior manager	1. December 2005 2. May 2006 3. September 2007 4. September 2008 5. July 2009	90 35 45 65 85
JB	Yes	Senior partner	1. May 2005 2. September 2005 3. March 2006 4. December 2008	90 95 75 120
JC	Yes	Senior partner	1. September 2005 2. April 2006 3. December 2008	95 70 120
JD	No	Manager	March 2006	65
JE	No	Manager	March 2006	70
JF	No	Senior partner	1. September 2005 2. May 2006	95 85
JG	No	Manager	June 2006	65
JH	No	Manager	June 2006	55
JI	No	Manager	April 2006	45
JJ	No	Senior	May 2006	50
JK	No	Semi-senior	April 2006	65
JL	No	Semi-senior	June 2006	105

Note:

'Accountant' refers to a trained financial auditor

'Non-accountant' refers to an assessor who is not a trained financial auditor

Table 2: JIF Interviewee details

Interviewee	'Accountant' Yes/No	Position in TRU Sustainability division	Date of interview	Interview Duration (minutes)
TA	Yes	Senior Director	1. April 2008** 2. May 2009 3. June 2009 4. August 2009	35 50 50 35
TB	No	Senior Associate	1. March 2008 2. June 2009 3. August 2009	85 45 70
TC	No	Manager	1. April 2008 2. June 2009 3. July 2009	50 65 50
TD	Yes	Senior	1. March 2008 2. May 2008	90 35
TE	No	Senior Partner	May 2009	50

** Extensive follow up email correspondence also occurred in late April 2008 as the initial interview had to be curtailed.

Note:

'Accountant' refers to an assessor who is a trained financial auditor

'Non-accountant' refers to an assessor who is not a trained financial auditor