Taming the Tyranny of the Barons:
Administrative Law and the Regulation of Power

Prof. Migai Akech

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The Chancellor, Vice-Chancellor, fellow academics, the Chief Justice, judges of the Supreme Court, the Court of Appeal, and the High Court, fellow lawyers and advocates, the media, ladies and gentlemen, friends, family, and all barons present.

Thank you all for the privilege and honor of your presence at this inaugural lecture.

I am delighted to deliver this inaugural lecture at this historic venue, on this day. I have tried to make the lecture simple and I hope I will be able to carry everyone along. Let me get right to it. My work as an academic has revolved around three concepts, namely power, democracy, and law, particularly Administrative Law.

Introduction

If there is one thing that has animated me the most, it would be how our daily lives, in both public and private spaces, are defined by routine and aggravating displays and abuses of power. In these spaces, we typically experience all kinds of tyranny – in our places of work, our homes, social clubs, our encounters with the public and private police, and whenever we deal with bureaucrats in national and international institutions. The irony is that we form these associations and institutions, in many cases out of our own volition, to safeguard our liberties and livelihoods. How, then, can we retain our inalienable right to self-rule, so that we are not oppressed even if we have agreed to, or

are deemed to, relinquish some of our power or autonomy so that we live in well-ordered societies?

This is the question that I have spent my life as an academic trying to figure out. I have sought to understand how we can use democracy and Administrative Law to prevent the abuse of power, so that we can forestall or contain tyranny, and thereby preserve our freedoms. My hypothesis has been a simple one: whenever a person wields a power over you that can affect, or affects, your liberties and livelihoods, that person has an obligation to exercise that power in a manner that is democratic, by which I mean that you should participate (or have a say) in how the power is exercised, and the power holder should be accountable to you in exercising the power.

We tend to think of tyranny as predominantly being a problem of governance in the state, which is the main unit of large-scale governance at the national level, but without scrutinizing why this is the case, or how it happens. My contribution to scholarship has been to say that while international geopolitical and neocolonial factors (such as development assistance and lopsided international trade regimes) may certainly account for the tyranny that we experience in the state, bad governance in the smaller units that make up the state significantly contributes to this tyranny. In turn, tyranny in these smaller or subterranean units is enabled by legal grants and sociologies and cultures of power. To liberate ourselves from this tyranny, we should therefore worry about and democratize the exercise of power in these smaller units of governance that are controlled by bureaucrats, whom I like to call the barons.

I have tested this hypothesis in various contexts and sought to understand whether and the extent to which the exercise of power is democratic in these smaller units of governance.

I have found that the exercise of power is in many cases neither participatory nor accountable and tried to explain why this is the case. I have found that governance is often undemocratic, and also difficult to democratize, for various reasons. I have then demonstrated how we can use Administrative Law to democratize the exercise of power, while appreciating that the utilization of Administrative Law is shaped by prevailing cultures and sociologies of power.

In this lecture, I want to share this research that I have done across a period of twenty-five years. I will proceed as follows.

First, I will talk about the concepts of power, democracy, and limited governance. My goal here is to explain why democracy is essential to regulating the exercise of power in collective decision-making processes.

Second, I will explain why Administrative Law provides tools that can be effective in our efforts to circumscribe or constrain the exercise of power on a day-to-day basis, and why a credible regime of Administrative Law is a pre-condition for democratic governance in any context.

Third, I will explain how the barons threaten our freedoms through laws, cultures and processes of rule-making, rule-interpretation, rule application, and adjudication that are autocratic in their orientation.

Finally, I will conclude by sketching out a future research agenda that consists of examining the opportunities and challenges that the automation of governance, or algorithmic decision-making, present for democracy and Administrative Law.

Power, Democracy, and Limited Governance

Power

As a starting point, we can think of power in terms of our autonomy, by which I mean our inherent right and capacity to govern ourselves as human beings and shape our environments. In turn, our power tends to vary, depending on various factors such as our resource endowments, socialization, literacy, and capacity for group action. From this perspective, power is "the ability to make somebody do something that otherwise he or she would not do".

Thinking of power in this sense is useful for understanding how human beings make collective decisions, why some people overpower and dominate others, why others are dominated, and what the dominated need to do regain and exercise their power. We, therefore, need to see power as a social relationship that works to enable the dominance of certain individuals or groups while suppressing the ability of the dominated to raise their issues and advance their interests in the making of collective decisions.

As I explain in the long version of the lecture, power is exercised in both overt and covert ways. In the former scenario, the focus is on the behavior of the powerful and the powerless inside the decision-making arena. This behavior is discernible and can readily be seen, for the most part. In the latter scenario, the concern is with behavior outside the decision-making arena but which affects the actions and inactions of the powerful and the powerless inside the decision-making arena.

Such actions and inactions include the prevention of issues from being taken to the decision-making arena, through means such as threats of sanctions, intimidation,

cooptation, and manipulation. They also include the control of information, the media, and the processes of education and socialization. Through these mechanisms, the powerful control the agenda and shape the issues that get to be taken to the decision-making arena and the decisions that get to be made. It follows that when we evaluate public participation and other governance processes, we need to look and see beyond the things that happen inside the decision-making arena.

When we view power in these terms, we can see that we have a governance predicament. On one hand, we claim an "inherent" right to self-rule that should give us some control over our destiny. On the other hand, we have no choice but to give up some of our power and live in societies in which, for a variety of reasons, some individuals and groups will always have more power than others. This means that if the powerless are to realize their right to self-rule, they require mechanisms that will enable them to control the exercise of power in the making of collective decisions.

Democracy, the Rule of Law, and the Regulation of Power

Historically, the ideals of democracy and the rule of law have constituted two such mechanisms. Typically, we use the term "democracy" to refer to a system of government in which a group of people who belong to a political organization such as a nation-state govern themselves. It is a system of rule by the many, and is distinguished from monarchy (which is the rule of one person), aristocracy (which is the rule of the best), oligarchy (which is the rule of the few), and kakistocracy (which is the rule of the worst or the least qualified).

But seeing democracy as rule by the many is not helpful if we are to regulate power, because majorities can, and often, oppress minorities. Democracy must, therefore, mean

more than a system of government or majoritarian rule. In addition, seeing democracy as a system of government does not tell us how exactly the people who belong to a political organization govern themselves on a day to day basis. How, for example, is power is exercised in the making of collective decisions in the many national and international political organizations in which associational life occurs?

It is in this respect that I find Robert Dahl's conceptualization of democracy to be particularly helpful. Dahl sees democracy as a process of making collective decisions that requires four unique conditions. The first condition is effective participation (meaning that every member of a political organization must have the opportunity to express his or her preferences or interests). The second condition is "voting equality at the decisive stage" (meaning that all votes have equal weight). The third condition is "enlightened understanding" (meaning that every person knows what is best for him or her). And the fourth condition is control of the agenda (meaning that the members of the political organization, and not just some of them, collectively have the power to decide what is placed on the agenda of the matters that are to be decided).

We, therefore, need to view democracy, not just as a system of government, but as a unique process of making collective decisions that facilitates the regulation of power, in so far as it demands the participation of the governed and accountability to the governed in collective decision-making processes. From this perspective, a process of making collective decisions can only be deemed to be democratic if it fulfills the four conditions.

This explains why, historically, democracy embraced the political philosophy of liberalism, which expresses the idea that people everywhere are created free and equal and have the right to self-rule, the right to choose their governors, and the right to hold them accountable. Liberalism gave us three mechanisms for limiting the power of government.

First, liberalism gave us the idea of the rule of law (which is the idea that government is limited by law and every person is equal before the law and should be treated equally). Second, it gave us the idea of a fundamental law or constitution. And third, it gave us the idea of inalienable human rights. Today, these mechanisms are also used to regulate power in the private domain.

Today, it is almost axiomatic that in a process of collective decision-making, the interests (or grievances) of every person who is subject to a political or administrative decision ought to be considered. In addition, the accountability of the rulers to the ruled for their decisions and the exercise of power signifies the primacy or sovereignty of the ruled.

Today, we claim to embrace liberal democracy in our governance arrangements, both at the national and international levels. However, the gap between theory and practice tends to be considerably wide in both cases. The result is that there is often little or no democracy given that collective decision-making processes in many cases do not fulfill Dahl's four conditions due to power relations that ensure some people dominate others. At best, our public participation processes are very poor approximations of the four conditions. For example, our Supreme Court uses standards such as "real participation", "meaningful participation", "deep participation", "engagement", and "sensitization" to assess public participation. But what do these standards mean, exactly? And, how do we measure them?

If we are to create the ideal conditions in which democratic governance in associational life can obtain, it therefore becomes important that we figure out the nature of power in any given context, how and why that power is created and sustained, and how and why some people are dominated. For example, what cultures and sociologies of power obtain in any given polity, and what explains these cultures and sociologies of power? Second,

what role does law play in the creation and sustenance of power, and why? Third, how can the dominated regain their power of self-rule? And, can technology, for example, help the dominated to regain their power of self-rule? Further, how can the dominated use law to regain their power of self-rule?

Let me now try to address these questions.

National and International Democracy Deficits

At the national level, there is a democracy deficit in our public governance. There is very little meaningful public participation. And the government is not accountable, for the most part. Here, it is the bureaucracy that exercises much of the power of government. When we encounter government, it is the bureaucracy that we interact with. And our interactions with the bureaucracy is often fraught with tyranny that takes forms such as delays, broken promises, and extortion. Unfortunately, these bureaucrats are often invisible, given that the mechanisms designed to protect the confidentiality of governmental affairs – such as state secrecy laws and privacy laws – invariably ensure that they are safely shielded from public scrutiny. The bureaucrats must be tamed if we are to bridge the democracy deficit in our public governance at the national level.

There are also democracy deficits in the private domain. Here, globalization and privatization processes have resulted in the transfer of immense power to private entities, which now considerably affect our freedoms.

The recent proliferation of international regulatory mechanisms has also created a democracy deficit in the international arena. Our interactions across borders – in domains

such as trade and sports – have led to a realization that our interests or grievances cannot be addressed by separate national governance systems.

As a result, the making of these governance decisions has shifted to public and private global institutions, often without our participation or accountability to us. This shift has created a democracy deficit because these international institutions "are not directly subject to control by national governments or domestic legal systems".

Who, then, are the barons?

In a nutshell, by the term "barons" I mean individuals who possess power in public and private national and international institutions. The barons are present everywhere. You will find them in government ministries, the public service and its agencies such as the public service commission, the legislature and its bureaucracy, the judiciary and its bureaucracy, institutions of horizontal accountability, election management bodies, political parties and their regulators, tribunals and other alternative forums for dispute resolution, tax administrators, immigration officers, pensions officers, national health insurance officers, public and private institutions of learning, private societies and clubs, local and international sports bodies, international development assistance administrators, and many other spaces where associational life occurs.

The exercise of power by these barons invariably entails some form of rulemaking, rule interpretation, rule application, and adjudication or settlement of disputes. Increasingly, the barons are also resorting to technologies such as artificial intelligence to make their decisions, in ways that are not always democratic. The barons often abuse their powers, and are the cause of the tyrannies that we routinely experience in our unavoidable encounters with public and private administration. We cannot say that we are free when

there is no democracy in the subterranean spaces of life that these barons exercise power in.

Fortunately, we can use law in general, and Administrative Law in particular, to prevent or manage these tyrannies. Law because it can be an equalizer of power. Administrative Law because it provides unique tools for circumscribing or constraining the exercise of power on a day-to-day basis.

So, why Administrative Law?

As its name suggests, Administrative Law regulates administration, which may be defined as "the execution of public affairs as distinguished from policymaking". It aims to circumscribe the exercise of the power so that it is not abused, and sanction the barons whenever they abuse their powers. It does so by requiring that the actions and decisions of the barons meet the requirements of legality, reasonableness, and procedural fairness. It then provides remedies for individuals or groups affected by administrative actions and decisions that do not meet these requirements.

By mandating the observation of these requirements, Administrative Law helps us to constrain human weaknesses such as bias, prejudice, impulsiveness, and corruption. The hope is that the barons will follow these requirements without being policed. This explains why many established democracies have charters of good administration, which is something we should emulate.

Accordingly, the promise of Administrative Law is that it can facilitate the realization of day-to-day democracy by making collective decision-making participatory and accountable.

Administrative Law also enhances the rule of law by promoting universalism and suppressing particularism. Universalism is the idea that rules, or the rule of law, matter more than relationships. That is, we should all be treated equally, irrespective of our relationships with the barons. On the other hand, particularism is the idea that relationships matter more than rules, and the barons can favor whoever they like. Administrative Law enhances the rule of law by making rules matter more than relationships. For example, it ensures that regulators are not captured by the entities that they regulate through relationships that make them biased.

Through procedures such as notice-and-comment, and judicial review, Administrative Law creates a surrogate political process that enables universalistic interests to participate in the making of collective decisions and contest such decisions. For this reason, Administrative Law gives universalistic interests a voice in collective decision-making processes.

Despite this great promise, in practice the impact of Administrative Law depends on existing power relations and politics. We should, therefore, expect that in practice the use of Administrative Law will be shaped by cultures and sociologies of power and the willingness and abilities of weak individuals and groups to confront these cultures and sociologies.

Let me now turn to the practice of Administrative Law.

Administrative Law in Practice

In Kenya's case, the use of Administrative Law has been shaped by a culture and sociology of power whose genesis can be traced to Britain's despotic modes of colonial governance,

in which government officials knew what was best for the "natives", who were not allowed to question the actions of these barons.

Although there were some formal rules that sought to regulate the broad powers of the barons in the colonial state, the barons often considered these rules to be unrealistic in the African context and largely ignored them. Further, privileged constituencies such as white settlers and big business obtained favorable administrative actions and decisions largely through informal channels. Administrative decisions were made in the informal spaces of governance then later endorsed or rubberstamped in the formal spaces.

Britain, therefore, bequeathed to Kenya a culture of informalism and authoritarianism, not democracy and the rule of law. Although Britain established a formal system of governance derived from English norms and practices, it governed Kenya using a system in which informal norms dominated the formal ones.

The formal legal system featured broad grants of poorly circumscribed discretionary powers, which the colonial administrators deployed without any pretense of accountability. Law unpretentiously constituted an instrument of power and coercion. Further, the functionaries of the colonial system based their actions and decisions on formal rules, informal considerations, or some combination of the two, as expediency dictated. This coercive system of governance, which revolved around the unaccountable Provincial Administration and security apparatus, was retained at independence and gave rise to the imperial presidency.

This undemocratic system has proved to be intractable because the rules of governance continue to be insufficiently institutionalized – meaning that they are all too often open-ended and neither participatory nor accountable. These rules are a godsend for our

governments, which ably use them in overt and covert ways to subvert the progress of democracy and the rule of law. We must, therefore, do much more to circumscribe the powers of the coercive statutory legal order and ensure the day-to-day participation of citizens in governance, and the accountability of the barons.

In this culture of power, the barons are beyond reproach, even when formal laws such as the constitution proclaim constitutionalism and require the exercise of power to be democratic. It is a culture in which defying the norms of good administration is the norm, and privacy rights trump open government.

This culture of power permeates Kenya's system of governance and continues to shape the making of collective decisions and our interactions with power, in both the public and private domains.

It is a culture of power that dictates that the President and his minions are the law and their decisions must be obeyed and not questioned, irrespective of what the Constitution says. And the police force is socialized to enforce this culture, using vague criminal laws that give them immense discretionary powers. For example, this explains why bail continues to be used as a tool of oppression in our criminal justice system.

It is a culture in which power must be displayed. And the barons are omnipresent and omniscient (all-knowing). This is why we hang their portraits in our homes and places of work.

As the examples I have given in the long version of the lecture demonstrate, although we have made great strides in using Administrative Law to constrain the exercise of power, the application of Administrative Law continues to be constrained by broad grants of

statutory powers and the crafty schemes of the barons who are very skillful at deploying the inherited culture of power to resist democratic governance.

In our system of governance and associational life, tyranny is the norm. However, this tyranny is often lawful given that it is enabled by open-ended statutory grants of power. Statutes dealing with taxation, criminal law, and traffic regulation, are very good examples of this phenomenon. This makes it exceedingly difficult to subject this tyranny to the discipline of Administrative Law. As a result, the barons often do what they want, when they want, and often get away with it (due to agenda and thought control), which then leads to bureaucratic impunity and corruption. The statutes enable tiresome bureaucratic microaggressions that are designed to ensure that citizens submit to authority.

Fortunately, the Constitution has now made it difficult for the barons to get away with their tyranny. Nevertheless, the open-ended grants of power remain all too common in our system of governance and continue to enable the barons to cleverly get away with their maladministration. The pervasiveness of the tyranny also means that courts cannot do nearly enough to constrain it. Therefore, parliament and the judiciary need to keep the gates of judicial review wide open, and not foreclose them as they are now seeking to do in the draft Fair Administrative Action Rules of 2024.

The tyranny is manifested in various ways. For example, a common practice among the barons in the public domain is to invent and deploy subjective non-prescribed or irrelevant factors in their decision making. Another practice is to assume and exercise powers that they have not been granted by any law. For example, the Council of this University does not have the power to send a Vice Chancellor on compulsory leave. And yet, it has assumed and exercised this power on two occasions.

Yet another practice is that appointments to public offices are not made democratically and are primarily based on considerations of political patronage. In this environment, it is easy for the barons to control the thinking of those subject to their power, as the clear message is that they need to toe the line if they want the barons to treat them favorably.

In this style of administration, whistleblowers and critics are not appreciated and their lives are often made very difficult, through the threat or imposition of sanctions. For example, the Employment Act provides that it is gross misconduct for an employee to "behave in a manner that is insulting" to his employer or a person placed in authority over him by his employer. Hence, those who are critical of the barons can be branded as disrespectful and even prosecuted for insubordination. Frivolous disciplinary processes will then be quickly instituted against such individuals.

In addition, individuals who expose the misdeeds or corruption of the barons can be punished under the Official Secrets Act – yet another statute that gives the barons overly vague and broad discretionary powers. The result is that there is little or no protection for whistleblowers and efforts to pass a law in this respect have all floundered so far. Again, this encourages impunity and tyranny, as many abuses of power are then not challenged.

Above all, this culture of power means that Administrative Law actions are bound to be episodic given the pervasiveness of the tyranny and the systemic barriers that complainants have to overcome to bring such actions. In the long version of the lecture, I discuss how these dynamics play out in various contexts of national public administration. These examples are illustrative. As I have indicated, the barons are ubiquitous, and the tyrannies illustrated in the long version of the lecture are replicated in very many other spaces of associational life.

These examples demonstrate the tyrannies that citizens routinely encounter in their dealings with the barons.

These tyrannies are replicated in the private domain. For example, there is pervasive tyranny in the case of international bodies, including sports organizations such as the International Cricket Council (ICC) and the International Association of Federation Football (FIFA). These organizations largely operate outside the purview of national and international law.

International geopolitical and neocolonial factors, such as development assistance and lopsided international trade regimes, also contribute to the tyranny that we experience in national governance.

In the case of development assistance, for example, development partners give us aid using laws and institutional mechanisms that bypass national public accountability systems. In fact, our public procurement regime legalizes this tyranny by exempting from its application the procurements made under bilateral or multilateral agreements. The recent oil supply agreement between the government and oil exporters from the Gulf is a perfect illustration of this tyranny.

What all this means is that we experience pervasive undemocratic governance in our associational life in the national and international domains. The question is, how do we make governance more democratic in these spaces? There are a number of things that we need to do.

First, we need to pay greater attention to reforming our statutory law regime, so that it can confer less discretionary powers to administrators. This is the work that the

Commission on the Implementation of the Constitution should have done, but did not do. As a result, we left the reform of these statutes to the vagaries of constitutional litigation and judicial review. In this approach, we have asked the courts to strike down the statutes for being unconstitutional. The courts have obliged, but only in a few cases, relatively speaking. The result is that the vast majority of the statutes remain intact, and remain instruments that the barons use to oppress citizens.

And to make matters worse, we continue to use the same colonial approach to drafting laws and regulations, which entails giving the barons overly wide discretionary powers. The draft Fair Administrative Action Rules of 2024 and the Traffic Act are cases in point. The latter, for example, gives an inspector power to remove a vehicle's identification plates without due process. This needs to change. We must always ask ourselves whether the powers we grant to the barons are the least restrictive means available for achieving regulatory objectives.

Second, we need to enhance the supply of good administration and the demand for democratic governance. Good administration would mean that the barons do the right thing in making administrative decisions, without being prompted and without being policed. One way to encourage the barons to supply good administration would be to formulate and implement a national charter on good administration. Such a charter would encourage the barons to make decisions motivated by what is right and not by avoiding punishment for breaking rules.

In addition, supplying good administration in a society such as ours in which political patronage and corruption are pervasive is bound to be a difficult task. The method we adopted in the Constitution for selecting public and state officers is clearly not working and needs rethinking if we are to ensure that these officers are selected on the basis of

merit. And because the method for appointing these officers is not working, we risk becoming a kakistocracy.

Third, and on the demand side, citizens need to be civically empowered to make better use of Administrative Law, including educating and training them to challenge power. We need to strengthen the capacities and resources of the powerless so that they can participate more meaningfully in public decision-making processes, and hold the barons to account. Again, a national charter on good administration could enhance the demand for good administration.

In short, a national charter on good administration would enable us to socialize the barons and citizens differently. This is the only way by which we can change the culture of tyranny in our administration.

Fourth, we need to deal with the informalism in our governance system. For sure, we can expect that some level of informalism will always be prevalent in any governance or political system. After all, politics is about negotiation. However, such informalism and the negotiations that go with it need to be kept transparent and open to public scrutiny. One way of doing so is to enact a law that as a general rule requires the meetings of the barons to be open to public observation, the publicization of these meetings, and the keeping of the records of these meetings, to which the public should have access.

Finally, the Supreme Court needs to revisit the guidelines for public participation that it established in the *BAT Case* and demand much more from public participation initiatives. One way of doing so is to establish indicators of public participation that factor power dynamics and address what happens inside and outside the decision-making arena. It is

only through such an approach that the courts can equalize power in public participation processes.

The courts also need to be more inclined to subject the exercise of private power to the discipline of Administrative Law. Cases involving the actions and decisions of entities such as the Kenya Association of Music Producers and FIFA demonstrate how our courts have abetted the tyrannies of these entities. Again, this needs to change.

Let me now try to look ahead.

A Future Research Agenda

Given human weaknesses such as bias, prejudice, impulsiveness, and corruption it would seem that attaining the rule of law in our systems of governance is virtually impossible. It would seem that achieving universalism is always going to be a pipe dream as long as human beings control administrative decision making.

In addition, and as we have seen, challenging unfair administrative action is often a very difficult task for the powerless. Constraints dictated by existing cultures and sociologies of power also mean that we will not always succeed in our efforts to question unfair administrative action.

So, why don't we use machines to make administrative decisions for us? Perhaps using machines or algorithms to make or assist us to make administrative decisions will save us from human tyranny and help us to attain the universalism that remains elusive? In the case of my long-delayed promotion to full professor at this university, for example, perhaps I would have been treated better had the decision been left to an algorithm.

Certainly, an algorithm would have quickly determined whether or not I had met the promotion criteria.

Algorithms can be used in decision-making in two ways. First, they can be used as aids to human decision-making. Second, they can be used to make decisions, which entails eliminating human discretion altogether. In either case, their uses may cause harms that implicate Administrative Law.

As I look to the future of Administrative Law scholarship, it, therefore, seems to me that we need to grapple with what the technologies that enable the digital automation of governance portend for democracy, the rule of law, and the exercise of power by the barons in the various contexts of public and private administration. This automation is powered by machine learning algorithms, which constitute a facet of artificial intelligence, and have created what is now termed algorithmic decision-making or automated decision-making.

Algorithmic decision-making raises a number of questions from the perspective of Administrative Law that should now concern scholars. The primary question is: will these technologies help us tame the tyranny of the barons, or make matters worse? Will the use of these technologies be beneficial (in the sense of promoting fairness and universalism in decision-making), or will they exhibit the very same human biases in decision-making that undermine our freedoms? And should they exhibit the same human biases, will Administrative Law as we know it be able to deal with these problems, or will it need new tools that are suited to the fourth industrial revolution? In other words, should "algorithmic accountability regimes sit on the same foundation as the due process artifacts of the industrial age"? And what do these technologies portend for existing

power relations? Will the technologies be an equalizer or merely serve to reinforce existing power imbalances?

As I conclude, it seems to me that Administrative Law will cope just fine with algorithmic decision-making, even if its principles and procedures will require some adaptation or contextualization. The safeguards of Administrative Law can no doubt help us to manage algorithmic decision-making. However, much will depend on how we implement them on the ground and the politics of the ground. In the coming years, I therefore plan to study and contribute to policy discourses on the application of Administrative Law to algorithmic decision-making and the automation of governance.

They say that the successful academic is the one who is able to exaggerate the importance of his or her work. I hope that I have succeeded in exaggerating the importance of my work.

Ladies and Gentlemen, Thank you for your kind attention.