STREET-LEVEL BUREAUCRACY AND PUBLIC ACCOUNTABILITY

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The concept of 'street-level bureaucracy' was coined by Michael Lipsky (1980) as the common denominator for what would become a scholarly theme. Since then his stress on the relative autonomy of professionals has been complemented by the insight that they are working in a micro-network of relations, in varying contexts. The conception of 'governance' adds a particular aspect to this: the multi-dimensional character of a policy system as a nested sequence of decisions. Combining these views casts a different perspective on the ways street-level bureaucrats are held accountable.

In this article some axiomatic assumptions are drawn from the existing literature on the theme of street-level bureaucracy and on the conception of governance. Acknowledging variety, and arguing for contextualized research, this results in a re-thinking of the issue of accountability at the street level.

INTRODUCTION

In the conventional discussions about street-level bureaucracy, the autonomy of staff working at the base of government has been seen either as posing a control problem to the 'top' or as a justification for more direct forms of accountability to the 'street'. As such, those discussions involve versions of the top-down-versus-bottom-up debate in implementation research, which now seems both highly dated and normatively biased. In this article, the consequences of governance for accountability at the street level are explored, against the background of what is called a shift from government to governance. We accept the perspective, argued, amongst others, by Day and Klein (1987) and by Pollitt (2003), that the accountability of street-level bureaucrats is essentially multiple, rather than practiced only in vertical relations. The objective is to link this perspective explicitly with contemporary conceptualizations of governance, while identifying some expectations about specific connections between accountability on the one hand and the diversity of settings on the other.

The central question in this article is, given the nature of street-level bureaucracy and the settings in which street-level bureaucrats do their work, what forms do the relationships in which these street-level bureaucrats are held accountable take? There are two sub questions:

1. What is the nature of street-level bureaucracy?
2. What are the implications of the conception of governance?

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Answers to these questions are formulated on the basis of a systematic overview of axiomatic insights as drawn from the literature. We then consider what are, on a meta-theoretical level, the consequences of linking the two sets of insights. The article ends with some conclusions.

THE LOGIC OF STREET-LEVEL BUREAUCRACY

Lipsky's classic and beyond

Street-level bureaucracies is the common denominator Michael Lipsky uses for 'the schools, police and welfare departments, lower courts, legal services offices, and other agencies whose workers interact with and have wide discretion over the dispensation of benefits or the allocation of public sanctions' (1980, p. xi). Lipsky argues that 'public policy is not best understood as made in legislatures or top-floor suites of high-ranking administrators, because in important ways it is actually made in the crowded offices and daily encounters of street-level workers' (Lipsky 1980, p. xii). Rather than formal laws and policy statutes it is 'the decisions of street-level bureaucrats, the routines they establish, and the devices they invent to cope with uncertainties and work pressures (that) effectively *become* the public policies they carry out' (Lipsky 1980, p. xii; original italics). In Lipsky's argument the policy-making roles of these functionaries are built upon two crucial characteristics of their work: (1) relatively high degrees of discretion; and (2) a relative autonomy from organizational authority. Lipsky observes that public employees who interact with citizens behave in ways that are unsanctioned, sometimes even contradicting official policy, because the structure of their jobs makes it impossible fully to achieve the expectations of their work. The individual solutions to the work pressures, Lipsky argues, 'add up' effectively to form public policy.

Together with the studies by his former research students, Weatherly (1979) and Prottas (1979), Lipsky's monograph became a classic and laid the foundations for what can be called a scholarly theme in the study of public administration. Since 1980, in other disciplines, on related themes, and beyond Lipsky's classic, further insights on street-level bureaucracy have been gained. These insights can be grouped around central concepts that, in turn, can be traced down to characteristics of street-level bureaucracy as, more or less explicitly, identified by Lipsky. In what follows, the latter are formulated as numbered statements, as grounding axioms for the theoretical-empirical study on the scholarly theme of street-level bureaucracy. We then present some insights drawn from the existing literature on governance and accountability in general. Combining the two clusters of insights leads to rethinking accountability at the street-level.

Statement 1: street-level bureaucrats necessarily have discretion and are forced to use it. Discretion and rules are interrelated: As rules specify the

duties and obligations of officials, discretion allows them freedom of action. The fact that discretion is always embedded in a rule structure, gives room for distinctions made in public law between more and less structured discretion (Donnison 1977; Bull 1980) or between weak and strong forms (Dworkin 1977, p. 31). Davis' definition is wide: 'A public officer has discretion wherever the effective limits on his power leave him free to make a choice among possible courses of action and inaction' (Davis 1969, p. 4). This definition acknowledges that, in fact, all delegated tasks involve some degree of discretion. Jowell (1973) suggests that discretion may be inevitable. Analytically, identifying types of decision situations in which discretion is more likely may be needed. And, obviously, making judgements about the desired or undesired, and the intended or unintended, character of observed discretion is a matter of normative evaluation.

Having, perhaps by definition, an open, empirical view on social reality, organizational sociologists have produced knowledge confirming the observations from public law mentioned above. However closely controlled and supervised, the essence of all work is that it involves some degree of discretion. Wherever work is delegated, the delegating person loses some control. While nearly all rules embody matters of interpretation, this is particularly the case with complex rules guaranteeing benefits or services. In the context of the relation between task complexity and delegation of responsibility, organizational sociologists, in their own discourse, have studied discretion. Since the work of Blau (1955), Merton (1957) and Simon (1957), organization sociologists have shown that rules – whatever they come from – are never self-executing. Actors may be faced with situations in which rules are ambiguous or even contradictory. Over time, the number of rules they are expected to apply may have grown. At the same time these actors work under an action imperative: they have to act. Actors see themselves forced to make choices: choices about how to deal with a specific rule – in general and in specific situations – but also choices between rules.

Analysts of public administration distinguish between various sources of what they call 'policy discretion' (Ringeling 1978). Van der Veen (1990) identifies the character of the rules and regulations involved; the structure (division of labour) of the implementing organization; the way in which democratic control is exercised; and work circumstances in the narrow sense – particularly interaction with clients – as sources of such discretion.

Statement 2:   street-level bureaucrats seek ways to manage their own work. The labour conditions under which public officials at the street-level work have some specific characteristics. The rule structure providing the *raison d'être* to a street-level bureaucracy not only makes discretion embedded but, going further, exercises a structuring influence on the way the rules are applied. Imposed from above or developed at the work floor, certain situations are handled in a way similar to how corresponding situations have been handled: in other words, there are standard operating procedures. At the same

time, because of the other characteristics of their work, street-level bureaucrats apply these standard procedures in ways which maximize their discretion. This phenomenon has been an object of study for sociologists of law.

Statement 3: street-level bureaucrats see themselves as professionals. Lipsky (1980, p. 147) describes street-level bureaucracies as governed by 'occupational or professional' ideologies. While his own work gives relatively little attention to those who most stridently claim to be professionals, such as doctors, it is important to recognize that the claims of autonomy that characterize such workers are made by all the workers whose roles he explores. Differences in the extent to which such claims are made, or perhaps more importantly, are accepted, may be seen as matters of variation within public employees with much in common. Street-level bureaucrats expect to be treated as professionals in as much as they claim that they should be trusted by their managers to use discretion to tackle their work tasks in an adaptive way. In defining professions, a distinction is made between, on the one hand, the characteristics of a specific kind of occupation and, on the other hand, the way in which society approaches the persons exercising that occupation. Medical doctors are seen to have a profession because they incorporate both elements: they share specified occupational characteristics, while societally enjoying esteem and being perceived as powerful. DiMaggio and Powell see a profession as an occupation whose members have managed to define 'the conditions and methods of their work' and to establish 'a cognitive base and legitimation for their occupational autonomy' (1983, p. 152). Thus defined, police officers or social workers, for instance, can also be seen as belonging to a profession.

The degree to which professionals, established or self-perceived, succeed in providing such legitimacy for their occupational autonomy varies, partly determined by the history of their profession, partly related to the accessibility of their expertise. In addition, two other dimensions characterize the nature of professions: that is, the indeterminacy and the invisibility of the situations in which that expertise is used. Then, in these respects, a police officer is as much a professional as a doctor. Fox (1974), amongst others, has stressed the importance of trust here. The combination of discretion, rule application, and the principally undetermined character of what the professional will be confronted with, presupposes a degree of trust in his or her competence to produce desired responses, and to deal with situations that may be exceptional in a sensible and creative way. In this sense many professionals are street-level bureaucrats; at the same time, all street-level bureaucrats are, at least in their own perception, professionals.

Among the various professions, the claims to ethical codes and altruistic values may vary, partly according to the degree of their institutionalization. Institutionalization may influence both the extent to which and the level on which the inherent presence of substantive degrees of autonomy produces self-binding mechanisms. In other words, the discretion is filled by rules professionals impose upon themselves. Street-level bureaucrats may actually

be policy-makers, but they use their freedom to make policy mainly to manage their work. Where Lipsky (1980) speaks of 'coping strategies' and 'defences against discretion', Satyamurti (1981) calls these mechanisms 'strategies of survival' (see also Hughes 1958).

Statement 4:   in their interaction with individual citizens in different roles, street-level-bureaucrats are public officials. 'The essence of street-level bureaucracies is that they require people to make decisions about other people. Street-level bureaucrats have discretion because the nature of service provision calls for human judgement that cannot be programmed and for which machines cannot substitute' (Lipsky 1980, p. 161). The inevitability of human judgement at the street level makes it hard for an executive to control the public servants working there. Superiors have a difficult job in managing street-level workers, particularly in a direct way. As Maynard-Moody and Musheno (2003, p. 20) state, street-level bureaucrats 'in their narratives (..) define their work and to a large extent themselves in terms of relationships more than rules'. Most especially in their relationships with individual citizens, despite the roles of these individual citizens (subjects of law, corporate representatives, clients, pupils, parents, patients), street-level bureaucrats have specific resources available which the individual citizens do not. Hasenfeld and Steinmetz (1981) see relationships between street-level bureaucrats and clients of social services as exchanges, but not necessarily symmetrical ones. Having a need for services for which alternatives are often unavailable, clients are taught how to behave. Hasenfeld and Steinmetz, like Lipsky, stress the ways street-level bureaucrats construct the behaviour of the citizens they are confronted with.

   This has consequences that go beyond the behaviour of the individual street-level bureaucrats themselves. Lipsky identifies the role of the latter as a political role. Street-level bureaucrats are not only policy-making actors in a policy process, but to a certain extent, they are policy formers rather than implementers. The political character of this role is also implied by the fact that the tasks of street-level-bureaucrats – depending on the policy domain – ultimately involve 'the allocation of particular goods and services in the society' (Lipsky 1980, p. 84). Street-level bureaucrats may be either formal government employees or work in organizations that are seen as part of civil society. Despite differences in their formal positions, within the labour division anchored in constitutional law and democracy and their institutions, street-level bureaucrats are public officials. As public actors acting in the public domain, they are held publicly accountable for the results of their work.

The addition of variety and context
Statement 5:   given the common denominator, there is a variety of types of street-level agencies, of street-level functionaries, and of street-level tasks. Inevitably, inasmuch as he is advancing path-breaking generalizations, Lipsky gives little attention to differences between the occupations he

examines. But, as indicated above, there are differences between types of street-level bureaucrats and these may have consequences, for instance, for the degree of uniformity in the performance, depending on category. In particular, there are differences in the nature of their tasks. These differences are visible between the work of the various types of street-level bureaucracy, but also within a single category, over time. A number of writers have elaborated this theme. Looking, for example, at what he calls 'agencies', James Q. Wilson (1989) distinguishes several sorts of organizational issues: what is the critical task and mission of an agency and how is autonomy maintained. Different kinds of functionaries deal with these issues; respectively, operators, managers and executives. Wilson uses the visibility of activities and the visibility of the results of those as dimensions for a typology of agencies. Thus he distinguishes between production, procedural, craft and coping organizations (see also Gregory 1995, 1996).

Another variation, important for modern analyses of street-level work, is the extent to which tasks are structured and regulated by the use of information and communication technologies (Zuurmond 1998; Bovens and Zouridis 2002; Bekkers and Homburg 2002, 2005; Snellen 2004). Since the actual functions of these technologies in terms of standardization is contested, the concrete consequences for discretion and autonomy will depend on the type of street-level bureaucracy – and the category of functionaries working in them. The basic assumption we can make is that office technology shifts discretion around rather than eliminates it to a degree and in ways that depend on the type of organization (Bovens and Zouridis 2002).

Statement 6:   street-level bureaucrats do their work in a micro-network or 'web' of multiple, both vertical and horizontal, relations. Sociologists who see reality as constructed (Berger and Luckman 1975) tend to point out that both an 'organization' and its boundaries are social constructions. This perspective recognizes the extent to which organizational boundaries may be permeable and changing, the organization's top and management structure may be multiple, and mixed forms may be apparent. Services may depend upon collaborative arrangements. These circumstances make the individual members of an organization both vertically and horizontally embedded.

Some authors stress that most of the 'exchanges' between organizations are likely to be in the interest of the organizations involved (Levine and White 1961; Hudson 1987). These generalizations apply, then, to street-level bureaucracies. Such bureaucracies are, by definition, in a vertical relation, strongly tied to institutions strongly tied to national institutions. At the same time, like government ministries, they interact horizontally as well. Street-level bureaucracies are functioning in more or less dense sets of inter-organizational 'exchanges' of various forms. Implicit in the street-level bureaucracy perspective is the fact that, given their direct interaction with citizens, street-level bureaucrats are very often not just working *in* organizations but are 'essentially located *at their boundaries*' (Hill 2005, p. 237, original

italics). At the same time, this can often also apply to their relationships to colleagues in other organizations.

While Lipsky concludes that the street-level bureaucrats fulfil, willy nilly and more or less legitimately, *de facto* policy-making and therefore political roles, it is not the substance of the legislation or policy statutory alone that is guiding their behaviour. As Weatherly puts it:

> A view of policy as determining front-line behaviour is insufficient for explaining what workers actually do and why, and how their activities affect clients. Of course, teachers do teach, caseworkers dispense public assistance, public defenders defend indigent clients, and doctors treat patients, and their work activities are certainly responsive to public policy. But their activities are also certainly responsive to a number of other influences over which the policy-maker and administrator may only have limited or no control. The pyramid-shaped organization chart depicting at the bottom the front-line worker as passively receiving and carrying out policies and procedures dispensed from above is a gross oversimplification. A more realistic model would place the front-line worker in the centre of an irregularly shaped sphere with vectors of differing size directed inward. (Weatherly 1979, p. 9)

Despite their 'individual dilemmas' (a reference to the subtitle of Lipsky's book), street-level bureaucrats work in a range of relationships. In the horizontal dimension they have co-workers in their departments – some of them colleagues with the same vocation – with whom they can consult. They may maintain contact with peers (working in 'neighbour' organizations) about the treatment of clients or patients. Those peers may be both members of their own profession or members of other professions. Professionals working at the street level have organized themselves in vocational associations, in varying degrees of institutionalization, and with different external consequences. In the vertical dimension, street-level bureaucrats maintain functional and more or less structural relationships with, on the one hand, individual citizens in their specific roles, and, on the other, public managers such as department chiefs. More at a distance, in terms of the overall system, come their politically appointed superiors.

In this context of both vertical and horizontal relations between organizations, maintained by individual street-level bureaucrats fulfilling the core tasks of these organizations, the notion of networks is a relevant one (see, for example, Kickert *et al.* 1997; Rhodes 2003). Specifically applied to the ways in which individual professionals working at the street-level and functioning as policy co-makers are embedded, the term 'micro-network' seems appropriate here. When street-level bureaucrats are seen as functioning in this multi-dimensional 'web' of relationships, it can be assumed that the direction from which they are being held accountable for their behaviour and its results, will not only be vertical. Colleagues' views will influence their behaviour. This being so, it casts the issue of accountability at the street-level

in a different perspective. Looking at the ways this accountability is managed or 'steered' makes the conception of governance relevant. What axiomatic assumptions can be identified? This is the concern of the section that follows.

GOVERNANCE AND ACCOUNTABILITY

Accountability and the primacy of politics

The traditional approach, which defines accountability in top-down terms, stems from the consensus about representative government. To this are linked, in Stone's (2002) terms, ideas about rational decision making as a model of reasoning, the metaphor of the market as a model of society, and the conception of policy-making seen as a production process. Together, these elements form 'the rationality project' (Stone 2002, p. 7). Top-down approaches to implementation can be added as a component of a coherent and accepted, but fundamentally normative, view on politics and administration and their relations.

Political accountability implies an orientation towards a top, demanding that functionaries are accountable to it. Looking at accountability from a wider perspective, Meijer and Bovens (2005, p. 172) observe various 'institutional practices of account giving'. Thus, defining 'public accountability', they make a distinction between different types of potential accountability relationships and related sets of norms and expectations: organizational accountability, professional accountability, poli-tical accountability, legal accountability and administrative accountability (Meijer and Bovens, 2005, pp. 172–3; see also Bovens 1998). Adopting their definition, we see accountability as 'a social relationship in which an actor feels an obligation to explain and to justify his conduct to some significant other' (Bovens 1998, p. 172). Following Gregory (2003), in this present article, holding to account is treated as an empirical phenomenon, as distinguished from responsibility with its wider normative connotation. In that case, it is *a priori* undetermined and poses empirical questions about who is practicing accountability to whom.

Governance: multi-dimensional and multi-layered

Statement 7: governance entails a set of clusters of activities practiced by various actors. Since a shift from government to governance has been identified, many authors have given definitions of the latter concept (see, for example, Pierre and Peters 2000; for an overview, see Kooiman 2003). Several authors stress the link with the concept of networks and ways of 'steering' that are other than hierarchical (John 2001; Rhodes 2003). O'Toole (2000, p. 276) puts a different emphasis by stating that the concept of governance is designed 'to incorporate complete understanding of the multiple levels of action and kinds of variables that can be expected to influence performance'. Accepting this focus on action (governance as governing; see Kooiman 2003)

instead of on formal institutions (government), Hill and Hupe (2002) have developed a view of the policy process as being composed of a range of activity clusters that can be conceived in terms of governance. Following Kiser and Ostrom (1982), they call these clusters – formerly addressed as 'stages' – levels of action. Besides giving direction (that is, 'policy formation'), governance entails institutional design as well as a management dimension (that is, 'implementation'). The question of *who* is the acting actor is addressed as an empirical one: it may be a public or a private actor. Whether, then, that actor is a legitimate policy-maker constitutes a separate question.

Statement 8:   governance takes place at different administrative layers and in various action situations. Though Hill and Hupe (2003) conceive public policy as governance when they address what they call the multi-layer problem in the study of the policy process, other authors, using a more traditional conceptualization, come to similar conclusions (see Torenvlied and Akkerman 2004). While a specific policy process along the vertical dimension often reaches across more than one administrative layer, the parts of the policy process involved – the *what*; either called 'stages' or 'action levels' – empirically do not determine the layer *where* the concerned activities are being practiced.

Statement 9:   in the practice of governance its multi-dimensional character leads to a range of political-administrative choices that may be congruent or incongruent, as well as more or less legitimate. Some authors identify governance with 'networks', others with New Public Management (for an evaluation, see Frederickson and Smith 2003). Alternatively, authors such as Kooiman (2003) stress the action dimensions, while defining governance as 'governing'. Governance in practice, then, means choices about ways of governing, made at several layers within a policy process, often simultaneously. Since Etzioni (1961) and Lindblom (1977), many authors, in different variants, have deployed a threefold distinction between what the latter has called fundamental 'mechanisms of social coordination': hierarchies, markets and networks (Williamson 1975; Thompson *et al.* 1999; Ouchi 1980; Bradach and Eccles 1991; Colebatch and Larmour 1993). Based on Lindblom (1977), Hill and Hupe (2002) speak of authority, transaction and persuasion as three fundamental 'modes of governance', seen as logically equal. Contrary to authors stressing the historic succession of the hierarchical way of government 'steering' by the more horizontal notion of governance, they highlight the contextual appropriateness of each mode of governance, according to the characteristics of the setting involved. As corresponding to these settings and fitting modes of governance, Hill and Hupe (2002) distinguish between three prescriptive perspectives on managing implementation, respectively labelled as 'Enforcement', 'Performance' and 'Co-production'. These may be described as 'modes of implementation'.

The choices made at the various layers a specific policy process reaches across can be classed in terms of congruency (Etzioni 1961, pp. 87–8), that is, the extent to which the chosen mode of implementation is compatible with the objectives of the action. In other words, there is a need to give attention to the differences in the tasks of street-level bureaucrats stressed in statement 5, above. Against the background of the characteristics of the setting involved, congruency, then, particularly concerns the relation between the mode of implementation on the scale of a single agency and the mode of governance on the system scale.

Public accountability

Statement 10:   given the multi-dimensional character of governance, both public power and public accountability are exercised by various actors, on different scales, something that also applies at the street-level. In the definition of public accountability mentioned above, Meijer and Bovens (2005) distinguish between an accountor and an accountee. The former can be an individual or an organization. The accountee or 'accountability forum' can be a person or an organization. In addition, on a system scale, it can be an institutional actor. Referring to a multiplicity of stakeholders, Behn (2001, Chapter 11) extends this twofold distinction while speaking of a '360-degree accountability for performance'. Thus one could suppose that on each scale a plurality of actors can be observed, all of whom may function, in fact, in a degree that will vary empirically, both as accountors and accountees.

Basing our approach on Meijer and Bovens' (2005) analysis of forms of public accountability, we suggest: (1) the founding principle; and (2) the nature of the relationships between accountors and accountees as dimensions for a typology (see table 1). The former can be authoritative and legitimate jurisdiction, expertise or citizenship; the nature of the latter can be vertical, horizontal or mixed. The coherent sets of values on these parameters can be seen as types of public accountability, labelled as, respectively, 'public-administrative accountability', 'professional accountability' and 'participatory accountability'.

Public-administrative accountability

Linked with accountability to the political organs of representative democracy is legal accountability. In particular, these two forms of accountability have in common their vertical orientation. In practice, political and legal accountability may be in conflict –even for street-level bureaucrats who may see themselves as first bound by law and second restrained hierarchically. Though the exploration of this issue is beyond the scope of this article, this aspect needs to be noted as a possible complication.

Many authors have characterized the so called 'New Public Management' as a range of managerial approaches to enhancing accountability while avoiding traditional forms of bureaucratic control (Hood 1995; Pollitt and

TABLE 1   *Forums of public accountability* ('to whom'?)*

Action scale	Types of public accountability		
	Public-administrative accountability	Professional accountability	Participatory accountability
SYSTEM	Representative organs Courts Minister/Cabinet Inspectorates Auditors	Vocational associations	National associations of Patients/parents/clients Communication media National interest groups
ORGANIZATION	Representative organs Institutions for appeal Local officials Executives Controllers	Peers**	Local associations Local news media Client councils Citizen's initiatives
INDIVIDUAL	Chiefs Collaborators Subjects of law Patients/pupils/clients	Colleagues	Citizens Association members Voters Parents/residents/etc.

*Note: the source of the term is A.J. Meijer and M.A.P. Bovens. 2005. 'Public Accountability in the Information Age', in V.J.J.M. Bekkers and V.F.M. Homburg (eds), *The Information Ecology of E-Government.*

**Note: peers within both the profession and related professions.

Bouckaert 2000). In fact, these approaches can be seen as a managerial variant of traditional top-down political accountability. Performance indicators and similar New Public Management tools are meant to function as alternative ways for holding civil servants in agencies and similar public organizations accountable (Flynn 1991).

Within the context of a liberal democracy and the rule of law these three forms of accountability – political, legal and 'New Public Managerial' – share a vertical orientation, while their common basis is an authoritative and legitimate jurisdiction. Therefore we propose the term 'public-administrative accountability' as a common defining term.

Professional accountability

In addition to accountability to the political-administrative top, street-level bureaucrats are often held accountable by their peers. As indicated above, peers practice collective self-management on various scales. Some authors argue that this approach preserves the traditional domination of certain professions: for instance, when review processes have an internal character only (Achterhuis 1980; Harrison and Pollitt 1994; Freidson 2001). In fact, not all professions – or rather semi-professions (Etzioni 1969) – are as institutionalized as the medical ones.

Professions are, however, not necessarily unified groups. There may be divisions within them (for example, within medicine, between primary and secondary care practitioners, between physicians and surgeons, between medical specialities, and so on). Furthermore, street-level bureaucrats of a

given profession may often cooperate, externally induced or not, with other professionals (doctors with social workers; teachers with educational psychologists, and so on). Thus, in professional accountability, holding to account and being held accountable have both an 'intra-' and an 'inter-' dimension. The basis for this type of accountability is the expertise (practiced in horizontal relations) inherent to a certain vocation.

Participatory accountability
The third source of ways in which street-level bureaucrats are held accountable is participatory citizenship. This is seen increasingly as an important alternative to the citizenship model embedded in representative democracy (see Taylor 2003). In his final chapter, Lipsky (1980) argues for forms of client-based evaluation of the work of street-level bureaucrats. Despite the variety and differing degrees of institutionalization, these phenomena have in common that they can be seen as forms of horizontally organized public accountability: countervailing powers are created.

Pollitt (2003, p. 94) observes an empirical reality in which public managers work in settings characterized by a multiplicity of both accountors and accountees. However, the situation Pollitt observes for the manager, all other things being equal, can be assumed for the professional they are overseeing as well. The three alternative sources of accountability distinguished above are located both on the scale of the profession as a system and on that of the single organization. In addition to these sources, what happens 'at the street-level', that is, in inter-individual interaction, is important. In the individual contacts that clients and collaborators have with street-level bureaucrats, the latter hold the former accountable but the opposite can be assumed to happen as well. Clients and collaborators, too, address street-level bureaucrats: for the appointments and agreements they jointly make and for the substantive results of these.

In our interpretation, multiple accountability involves seeing individual workers as functioning within a complex institutional web. On the scale of inter-individual contacts, of the organization and inter-organizational interaction, and of the system, street-level bureaucrats are being held accountable, by definition, in mixed ways. Public actors simultaneously play both the roles of accountors and accountees. Given the variety of sources of accountability, single public actors, managers as well as street-level bureaucrats, will see themselves confronted with multiple demands for accountable behaviour. Particularly on the scale of the individual, the different values implied and action imperatives stemming from these varying sources may produce tensions and will often be contradictory, posing inescapable dilemmas for these officials (Behn 2001). At the root of this is the fact that power relations will often be asymmetrical.

It is important to note that a characteristic of managerial arrangements for many street-level bureaucrats is that managers are themselves drawn from the profession. There are then some issues here about the extent to which

such people see themselves as 'peers' as opposed to 'superiors'. The supposition is that they will somehow be able to be both at once, resolving one of the issues about multiple accountability through their own roles. The feasibility of this depends upon the way in which accountability is perceived, an issue to which we return below.

RETHINKING ACCOUNTABILITY AT THE STREET LEVEL

Street-level accountability in context

Referring to the empirical research of Meyers *et al.* (1998) and Meershoek *et al.* (2001), while focusing on the impact of institutional reform in street-level bureaucracies, Lettinga and Moulijn (2004, p. 12) conclude 'that it is very hard to control daily practices of front-line professionals because of work conditions and professional willingness to conform'. This conclusion is in line with existing insights about the consequences of working in human services organizations (Lipsky 1980; Hasenfeld 1983; Freidson 2001). This observed fact contributes to situations in which the performance of street-level bureaucrats is judged negatively by relevant public actors. The latter then seek to put the blame on a discretion perceived as too high. The standard reaction in such a case aims at limiting that discretion: by more rules, tighter control, and stricter procedures. But, as we have shown, Lipsky's approach raises empirical questions about the conditions for the effectiveness of this standard reaction.

Lipsky's 'individual dilemmas' subtitle draws attention to street-level decision making as posing 'dilemmas' for 'the individual in public services', although the resultant decisions are not necessarily highly individual. Empirically, regularities in behaviour can be revealed through systematic investigation of the multiple embeddedness of the work of street-level bureaucrats. Important normative issues are also at stake here. The law is enforced, wealth is distributed, services are provided, claims on scarce resources are made, all at the street-level but in the name of the common good and as public concerns. Decisions of professionals in public service have public consequences. If the need for control is granted but the standard reaction from the top has a restricted relevance, what alternative forms of wider public control can be observed? If control is not held, physically or virtually, by the political centre, who else participates in the controlling? Statements 11 and 12, below, summarize the answers to these questions.

Statement 11: in the multi-dimensional micro-network of relations (web) street-level bureaucrats practice multiple accountability. In their daily contacts, co-workers and colleagues working within the same or related organization give street-level bureaucrats advice and support, accept referrals, and divert their attention when necessary. Lipsky stresses the importance of judgement by peers. By organizing quality control, the bureaucratic superior can develop management tools and can also engage in what Lipsky calls

'changing the bureaucratic climate'. In their relationships with street-level bureaucrats, citizens, in their various roles, show less or more responsiveness by producing information by which they can be bureaucratically 'processed'. Having both duties and rights, citizens can hold street-level bureaucrats accountable for their behaviour and, if necessary, make a formal appeal in response to the results of that behaviour.

Statement 12:   within the variety of relations in the network that surrounds an individual street-level bureaucrat, specific clusters of accountability relations can be identified as – ideal typically – linked with various types of settings. Seen from an aggregated level, the behaviour of street-level bureaucrats shows regularities. The 'frontline professional', on the other hand, functions in a micro-network of relationships. For analysis, this contextualization, that is, observing individual street-level bureaucrats as organization members and identifying the web of structural contacts they are engaged in, has consequences. Despite the similarity of their 'street-level' characteristics, organizations, functionaries and tasks vary, but so do the institutional settings they are embedded in. The forms that accountability may take as practiced in the micro-networks of a specific character, may therefore differ. In particular, a discriminating effect can be expected of the following parameters: the essential characteristic of accountability on the scale of the individual and on the scale of the organization. Here the questions are fourfold; what are the following:

1. the core issue;
2. the character of the relationships between accountors and accountees;
3. the role of the citizen;
4. and, given the valid mode of implementation, the guiding type of public accountability.

Calling the coherent sets of values on these parameters 'accountability regimes at the street-level', we can conceptualize the links between the character of accountability relations and that of specific settings, particularly the mode of implementation practiced in a given setting on the scale of the street-level organization and its members (see table 2). Thus, respectively, a 'task oriented', 'indicator oriented' and 'impact oriented' accountability regime at the street level can be distinguished.

  Specifying the nature of the context involved means identifying the accountability regime at hand. In street-level bureaucracies with a critical task that is clearly defined, such as the collection of taxes, the persons working there will see the maintenance of their professionalism as directly defined by their task. The functional deployment of people and means being important, the ways in which these professionals are held accountable will also be task oriented. In other street-level organizations, with different tasks and other 'modes of implementation' involved, the production of tangible, measurable results, as pre-defined, is what guides activity. Thus, in such cases,

accountability will take the literal form of 'accounting' and being accounted for. In settings in which professionals are acknowledged as having substantial autonomy, realized outcomes rather than delivered outputs will be judged. In addressing these street-level bureaucrats, the impact of their contribution to the co-production of desired results will be the leading consideration.

Because it is difficult to summarize, table 2, below, omits one aspect of accountability that has been highlighted in this article: accountability to peers. What should be evident is that co-production by implication readily involves collaborative action between professionals or professions. By contrast, the other modes of implementation may make accountability to peers difficult to operate in practice. Within hierarchical systems, actors consult peers and are to a great extent trained by peers (Hill 1969, p. 83), but that does not concern accountability relationships. Indeed, peers may often be put in a difficult position when they perceive what they regard as malpractice, with their power to call to account ultimately limited to the unpopular act of 'whistle blowing' (reporting to superiors). Similar constraints exist, perhaps even more forcefully, in situations in which contracts themselves are designed to enforce accountability.

This leads us back to the issue of congruence. The form in which Hill and Hupe (2002, Chapter 8) applied Etzioni's (1961) notion of congruence regarded in particular issues about relationships between activities and the way in which they are organized. In Etzioni's original formulation the suggestion was that compliance takes rather different forms in different settings: prisons, business firms, churches, and so on. Applying this formulation to public policy, it may equally be argued that the appropriate way to manage the delivery of an explicitly defined cash benefit (such as child benefit) may be very different from the appropriate way to organize refuse collection, which again may differ from functional ways to manage the activities of teachers.

Moreover, if issues about accountability are added in, the equation gets even more complicated. The issues then are about both the nature of the activity and the aspirations about accountability. As far as many of the activities of street-level bureaucrats are concerned, there is likely to be a combination of an activity which is hard to control from the top and aspirations to secure multiple accountability. In that sense it is not merely that the work of a teacher is different to that of a benefits clerk or a refuse collector, but also that forms of horizontal accountability (to other teachers, to allied professions, to parents and indeed to children) are regarded as desirable. While clearly it is a normative judgement to assert that teachers should not be hierarchically controlled or required to work within closely prescribed contracts – and therefore asserting this is beyond the scope of this article – it is quite appropriate to point out that some desired aspects of accountability may need to be abandoned if these modes of implementation are adopted.

TABLE 2   *A typology of accountability regimes at the street level*

Parameters	Modes of implementation		
	Enforcement	Performance	Co-production
Characteristic of accountability at scale of individuals	Compliance to rules	Compliance to targets	Compliance to internalized professional standards
Characteristic of accountability at scale of organization	Conformity to standard operating procedures	Conformity to contract	Conformity to shared goal and standard setting
Issue	Were inputs respected?	Did promised outputs occur?	Have shared outcomes been realized?
Character of relationships accountors–accountees	Rule bound	Contractual	Trust
Citizen role in accountability	Presupposed compliance Access to complaint- and appeal procedures	Exit* (when feasible) Otherwise provision of evidence on contract compliance	Voice* (potential for cooperation)
Guiding type of public accountability	Public-administrative accountability	Public-administrative accountability (managerial variant)	Professional or participatory accountability
Fitting labels for accountability regime	Task oriented	Indicator oriented	Impact oriented

*Note: the source of the term is A.O. Hirschman. 1970. *Exit, Voice and Loyalty.*

However, as the arguments in statements 7 and 8, above, have suggested, the activities we are talking about are multiple and likely to be embedded in complex organizational arrangements. Hence the propositions about accountability choices may not be as simple as outlined above. To stay with the example of teaching, different aspects of the same general activity may involve different accountabilities. Resource use issues may involve hierarchical accountability, curriculum use horizontal accountability, and aspects of direct behaviour in the classroom accountability to parents and children. This only reinforces the overall point about the avoidance of simple formulae in relation to the accountability of street-level bureaucrats.

CONCLUSIONS

In this article we have not argued for the strengthening or weakening of any particular forms of accountability. Instead, we have identified the axiomatic assumptions implicitly formulated in what, since Lipsky's classic, has become a scholarly theme of its own. Following this, we have done the same for the conception of governance. We then confronted the two sets of assumptions. Our aim has been to specify the characteristics of the contexts in which street-level bureaucrats do their work and to clarify consequences of these characteristics for the way professionals in public service are held accountable.

Two ideas that Hill and Hupe (2002) have explored in their book *Implementing Public Policy* and in subsequent articles, were brought into play for the analysis of the issue of accountability at the street level. The first idea is that decisions determining action in public policy are nested in a multi-dimensional institutional system. A policy system involves 'a nested sequence of decisions – about structure, financing and about the management of outputs – for which different actors may be accountable, perhaps in different ways' (Hill 2005, pp. 277–8). These nesting decisions, in turn, set (quasi-)institutional contexts for each other. The dynamic of relations between the layers a policy process encounters going along a vertical line involves a succession of struggles for control over action. This action can, whether clustered as 'action levels' or as 'stages', take various forms.

In the context of governance, 'the street-level' needs to be conceived of as a layer – administratively formal or not – where governance may be multiple. Governance of and by street-level bureaucrats is practised in a variety of action situations, while street-level bureaucrats are held accountable in various relations: bottom-up as well as top-down, but also 'sideways'.

The second notion elaborated here is that alternative forms of accountability exist. These can be seen as more or less appropriate in different settings. Hence, an emphasis upon multiple accountability does not imply a dismissal of debates about who should be in control. It is obvious that judgements on what looks appropriate are essentially political judgements. Rather, this emphasis indicates that arguments about appropriate forms of

accountability can be grounded in a more precise understanding of the issues that are at stake and the contexts in which they are disputed. Multiple accountabilities may be necessary in practice; they may also be regarded as desirable (for example, they may increase the range of influence points available to citizens).

Since most of the activities of street-level bureaucrats are multi-faceted, some bits will be structured where others are not. The institutional context helps determine that structuring. The implication for practice is that there are some important political choices, not only about what to structure and how to structure it, but also, about who should be in control as a consequence of that restructuring. Policy processes involve the making of choices between 'authority', 'transaction' and 'persuasion' or, respectively, 'enforcement', 'performance' and 'co-production', where the related modes of implementation are concerned. Rhodes rightly stresses that the choice between these 'models' is 'not necessarily or inevitably a matter of ideological conviction but of practicality', asking 'under what conditions does each governing structure work effectively' (Rhodes 1997, p. 47).

The complexity of governance therefore means that there are multiple accountabilities: issues of holding to account emerge in political-societal relations at various places. For some, this perhaps lessens the need to worry too much about 'control deficits'. Street-level bureaucrats are held accountable in different ways and to varying degrees, but certainly in more ways than strictly from the political centre alone. Within the web of these multiple accountabilities which produce possibly contradictory action imperatives, street-level bureaucrats constantly weigh how to act. The evaluation of these acts, particularly at an aggregated level, ultimately remains a matter of political judgement. However, analysing these accountabilities as practised at the street level, is open to empirical-comparative research. This latter may add a new chapter to the development of the theme of street-level bureaucracy.

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