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How street-level dilemmas and politics shape divergence: The accountability regimes framework

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Abstract

Hierarchical accountability often proves insufficient to control street-level implementation, where complex, informal accountability relations prevail and tasks must be prioritized. However, scholars lack a theoretical model of how accountability relations affect implementation behaviors that are inconsistent with policy. By extending the Accountability Regimes Framework (ARF), this paper explains how multiple competing subjective street-level accountabilities translate into policy divergence. The anti-terrorism "Prevent Duty" policy in the United Kingdom requires university lecturers to report any student they suspect may be undergoing a process of radicalization. We ask: what perceived street-level accountabilities and dilemmas does this politically contested policy imply for lecturers, and how do they affect divergence? An online survey of British lecturers ($N = 809$), combined with 35 qualitative follow-up interviews, reveals that accountability dilemmas trigger policy divergence. The ARF models how street-level bureaucrats become informal policymakers in the political system when rules clash with their roles as professionals, citizen-agents, or "political animals."

KEYWORDS

accountability dilemmas, policy divergence, policy implementation theory, public accountability, street-level bureaucracy

INTRODUCTION

"Implementation represents a key venue for the expression of political conflict."
Manna & Moffitt, 2021: 190.

This article tackles the crucial issue of how informal accountability relations translate into street-level divergence. Street-level bureaucrats—such as inspectors, police officers, or teachers—are widely recognized as crucial actors who, when translating regulations into practice, may use their discretion to diverge from formal rules (Eiró, 2022; Lipsky, 2010; Visser & Kruyen, 2021). Street-level bureaucrats inherently face a multitude of tasks and need to prioritize among them. This makes them crucial policymakers who shape how policies actually look in practice (Davidovitz et al., 2021). Street-level divergence is an umbrella term for a wide range of street-level bureaucrats' behavior, both desirable and undesirable, that is inconsistent with policy directives (Gofen and Weaver, Under Review). For instance, a nurse may decide to not charge poor families a fee for childhood vaccinations even if this is official government policy; or welfare workers may allocate benefits in racially biased ways (Gofen, 2014; Thomann & Rapp, 2018). While behavioral research has studied what makes street-level bureaucrats more or less *willing* to implement a given policy (Tummers et al., 2012), a theoretical framework that systematically explains how street-level bureaucrats *act* in practice remains elusive (Saetren, 2005). As street-level divergence is far from an homogeneous and unified phenomenon (Gofen, 2014, 485), the scholarly consensus is "that no general implementation theory is close at hand" (Saetren, 2014, 93) that would help us model implementation outcomes at the street level (Assouline et al., 2022; Hill & Hupe, 2022; Maynard-Moody & Portillo, 2010; Moulton & Sandfort, 2017).

Accountability mechanisms that relate an account-giver to an account-holder are a crucial factor affecting the former's behavior (Aleksovska et al., 2019; Bovens et al., 2014). However, empirically, hierarchical oversight often proves insufficient to prevent street-level bureaucrats from diverging from policies (Brodkin, 2008; Holland, 2016; Hupe & Hill, 2007; Keulemans & Groeneveld, 2020; Lieberherr & Thomann, 2019). Instead, decades of cumulative evidence suggests that how street-level bureaucrats perceive their own work and responsibilities shapes how they act, driven by their self-conceptions as "state agents," "citizen agents," and "professional-agents," or "knowledge-agents" (Cecchini & Harrits, 2022; Lipsky, 2010; Maynard-Moody & Musheno, 2022; Tummers et al., 2012). Such perceptions are determined not only by top–down expectations from superiors but also by horizontal and informal accountability relations with a multitude of different actors (Aleksovska & Schillemans, 2021; Bovens, 2007; Hwang and Han, 2017; Lieberherr & Thomann, 2019). For example, a nurse might care more about helping poor families and the Hippocratic oath than about the organizational repercussions of disobeying official policy. The Accountability Regimes Framework (ARF), originally developed by Hupe and Hill (2007) and subsequently refined by Hupe and van der Krogt (2013) and Thomann et al. (2018), captures these interacting, informal demands, by defining public accountability as social relationships wherein a policy actor feels an obligation to justify their behavior to another significant person. If these social roles create conflicting pressures, then street-level bureaucrats face the accountability "dilemmas" that Lipsky (2010) so famously described.

However, thus far, the ARF was only used to describe accountability relationships in a marketized, but unpolitical hybrid implementation arrangement (Thomann et al., 2018). In this paper, we enhance the ARF to provide concretely testable expectations about how street-level accountabilities affect the actual behavior of street-level bureaucrats. Street-level bureaucrats inherently prioritize some tasks and relationships over others. This subjective prioritization influences how street-level bureaucrats interpret the competing pressures they face when doing their jobs. Competing pressures, perceived as accountability dilemmas, ultimately influence the degree to which they adhere to formal policies or engage in divergence. Moreover, extant accountability approaches model street-level bureaucrats in four main roles: as policy implementers ("state agents"), as professionals ("professional-agents" or "knowledge-agents"), in their relation to clients ("citizen agents"), and as market agents (Cecchini & Harrits, 2022; Maynard-Moody & Musheno, 2022; Thomann et al. 2018). Adding to emerging research on the politicized context in which policy implementers often operate (Davidovitz & Cohen, 2021; Eiró, 2022; Hinterleitner & Wittwer, 2022; Peters et al., 2022), our study accounts for the fact that street-level bureaucrats are also "political animals" who give account to other citizens, political organizations and networks, and the political system that they were socialized into. In highly politicized policy environments with weak hierarchical accountability structures, political, ideological, or ethical principles or preferences shape the inherent prioritization of tasks and therefore influence the likelihood that a street-level bureaucrat would diverge from formal policies (Hinterleitner & Wittwer, 2022; Manna & Moffitt, 2021).

Multiple simultaneous accountability pressures are a universal feature of work in an increasingly hybridized public sector (Aleksovska et al., 2019; Hwang & Han, 2017). Our study tests the empirical implications for street-level divergence systematically by examining how social science lecturers in British universities implement the Prevent Duty. Although not formally employed by the state, university lecturers are a type of teacher with all the typical characteristics of street-level bureaucrats (Lipsky, 2010; Sager et al., 2014; Zacka, 2018): they deliver education in direct interaction with students, operate at the hierarchical bottom of their organizations while enjoying very high levels of discretion, and have high levels of professionalism. In 2015, the United Kingdom (UK)'s Counterterrorism and Security Act (CSA) introduced a statutory obligation for universities to train teaching staff in recognizing signs of radicalization and establish procedures for them to report anyone they suspect of being radicalized.[1] Thus, lecturers are presented with an additional legal requirement that is not part of their original job profile. We ask: what perceived street-level accountabilities and dilemmas does this politically contested policy imply for lecturers, and how do they affect divergence? A sequential mixed-method approach that combines an online survey of social science lecturers from British universities ($N = 809$) and qualitative semi-structured interviews with those that reported experiences implementing the Prevent Duty ($N = 35$) allows us to gain a simultaneously broad and in-depth understanding of how competing street-level accountabilities create accountability dilemmas that translate into divergence.

As the first systematic test of the ARF's ability to explain the mechanisms that lead street-level workers to use their discretion and "bend, break, or ignore rules" (Gofen, 2014, 476), and by extending the ARF to include political-ideological accountability relations, our paper makes valuable theoretical contributions to the policy implementation literature (Hill & Hupe, 2022; Matland, 1995). Moreover, our empirical study provides promising evidence for the ARF's explanatory power. We find that street-level bureaucrats may "correct" for policies that they perceive to stand at odds with their role as political citizens, which implies that street-level bureaucrats have their own status as informal policymakers in the political system.

Various properties make the Prevent Duty a likely case to observe informal accountability relations and street-level divergence (Hill & Hupe, 2022; Matland, 1995). Compliance with the Prevent Duty is almost impossible to monitor and enforce in everyday student–lecturer interactions. University lecturers as "private street-level bureaucrats" (Thomann et al., 2018) thus have the discretion and power to diverge from the rules in practice. Moreover, the Prevent Duty policy is uniquely politically sensitive, contested, and ambiguous. Following the logic of "Sinatra inferences," this likely case provides a first testing stone for the ARF's ability to explain divergence: if the framework cannot make it here, it cannot make it anywhere—at the preliminary expense of generalizability to more "traditional" street-level settings (Levy, 2007).

Next, the paper summarizes the AFR, presents our proposed extension, argues how it can explain street-level divergence, and introduces the case study of the Prevent Duty in British universities. We then explain the empirical strategy used in this study. Subsequently, we present the main results of our paper. Finally, we conclude by distilling their broader implications and avenues for future research.

THE ACCOUNTABILITY REGIMES FRAMEWORK

Accountability is a core factor affecting street-level divergence. It is defined as "a mechanism relating an account-giver to an account-holder, which should have an impact on the decisions and behaviors of the account-giver" (Aleksovska et al., 2019: 1). Traditionally, street-level bureaucrats are expected to faithfully comply with democratically decided public policies, even if they personally disagree with them. However, this often requires answerability through a formally defined mechanism within specific institutional arrangements or relations in which street-level bureaucrats can be held to account by a principal (Bovens et al., 2014). Yet, street-level bureaucrats are neither solely nor primarily held accountable through formal-hierarchical mechanisms (Frink & Klimoski, 2004; Katz & Kahn, 1978). Rather, they also seek to satisfice an informal web of diverse social relationships and (perceived) pressures, also called "forums" (Bovens, 2007; Brodkin, 2008: 321; Hupe & Hill, 2007; Overman & Schillemans, 2022; Tetlock, 2002). These are particularly evident when street-level bureaucrats are not formally employed

in a public organization, and must therefore also answer to other account holders such as stakeholders or customers (Thomann & Sager, 2017).

Integrating concepts from behavioral accountability literature (Frink & Klimoski, 2004; Katz & Kahn, 1978; Tetlock, 2002), the ARF was devised to offer a nuanced perspective that recognizes both formal and informal forms of accountability relations at the street level. The ARF implicitly has its roots in role identity theory (Webeck & Lee, 2022), which posits that bureaucrats adopt dynamic identities based on roles that are consistent with personal values and beliefs and that they feel are supported by key referents. Such role identities depend on the interactional contexts and can vary among bureaucrats of the same organization. Street-level bureaucrats develop their own self-meaning and therefore differ in which roles they assume in their interactions with others, depending on how strong the ties with others in their social networks are and how much support they receive based on that identity (Webeck & Lee, 2022). From these roles emerge accountability relations. While the ARF bears some resemblance with the "institutional logics" framework (Thornton et al., 2012), its comparative advantage lies in neither reducing street-level bureaucrats' behavior to contextual influences nor to individual-level motivations. Instead, the framework understands street-level bureaucrats' behavior as the product of how they perceive and weigh both formal and informal, as well as vertical and horizontal, relationships with other actors in their everyday work environment. A formal, vertical relationship would, for example, be the duty of a police officer to report to their management at a higher level of hierarchy in the organization. Conversely, an informal, horizontal relationship would, for example, be that of a midwife with her peers, in which they exchange experiences and emotional support.

Box 1 summarizes the core concepts of the ARF, for which we provide examples below. Crucially, the ARF concentrates on the subjective perception of accountability. "Accountability regimes" are systems where different actors engage in social relationships that define specific sets of formal or informal norms and expectations for appropriate behavior. These so-called action prescriptions add up

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BOX 1   Core concepts under the ARF.

Accountability = The social relationships in which street-level bureaucrats feel an obligation to explain and justify their conduct to some significant other.

Accountability regimes = Sets of guidelines for action that prevail within social relationships (roles). Actors ask and give each other explanations and justifications for their actions.

Action prescriptions = Norms and demands about how street-level bureaucrats should preferably behave; they emerge at three levels: from institutionalized contexts (system level—such as the state, a sector, a society, a profession), the organization and work circumstances (organizational level—such as a school, a hospital, a police station), and individual characteristics (level of persons, for example, peers or citizens). The resulting (subjective or objective) expectations for behavior add up to accountability **pressure** at the street level.

Reference = The intensity with which street-level bureaucrats allocate their attention to and identify with particular action prescriptions/pressures—in other words, the importance that they attribute to a given accountability relation, and the degree to which derive meaning from it. Reference to an accountability regime captures subjective perceptions of actors, not objective behavior.

Accountability dilemmas = Situations when multiple action prescriptions create competing demands and values—when some action prescriptions are at the expense of or incongruent with other action prescriptions. We analyze horizontal accountability dilemmas between rule pressure and other action prescriptions.

Adapted from Thomann et al. 2018.

to accountability pressures that constrain and guide the behavior of street-level bureaucrats (Hupe & Hill, 2007; Hupe & van der Krogt, 2013). Street-level bureaucrats "refer" to different accountability pressures with different intensity. That is, they subjectively attribute different levels of importance to different social relationships and demands in their daily work (Overman & Schillemans, 2022). For instance, a lecturer may see defending academic freedom and delivering high-quality education to students as a major priority in their daily work, while not attributing much importance to contributing toward the University's ability to compete for students and provide good value for money. The existence of multiple action prescriptions—particularly if street-level bureaucrats strongly refer to them—can create accountability dilemmas (Thomann et al., 2018, 303; Tummers et al., 2012). Accountability dilemmas emerge when street-level bureaucrats attribute high importance to accountability pressures that conflict with their role as policy implementers (what we call "rule pressure"). For example, if a teacher needs to implement a curriculum that they see as hampering the quality of education, they experience a rule-professional accountability dilemma (Gofen, 2014). Our study takes the ARF further by theorizing the consequences of such accountability dilemmas for street-level behavior in the next section.

We summarize the ARF and illustrate it with the Prevent Duty in Table 1. First, *political-administrative accountability*, whose source is the state, implies strictly following formal rules, regulations, and policies as they were written (rule pressure). Lecturers are expected to follow the guidelines and concrete procedures of the Prevent Duty in cases where they suspect radicalization. Second, from the interactions between professionals with specific expertise, shared norms, standards of conduct, and values emerge (professional/vocational pressure) as the source of *professional accountability* (Cecchini & Harrits, 2022; Maynard-Moody & Musheno, 2022). Among their main professional obligations, lecturers are expected to provide high-quality education while also protecting and exercising academic freedom.

Participatory (or societal) accountability, instead, arises from the expectations held by society and clients, termed societal pressure (Hupe & Hill, 2007; Hupe & van der Krogt, 2013). Lecturers seek to act as mentors who provide pastoral care and ensure equal opportunities for their students. Finally, *market accountability* requires street-level bureaucrats to act in accordance with market values such as efficiency and competition (incentive pressure) (Lieberherr & Thomann, 2019; Thomann et al., 2018). The increasingly marketized higher education environment implies that lecturers as university employees are also engaged in a supplier–customer relationship with students and parents.

The ARF models street-level bureaucrats in their roles as "state agents," "professional-agents," or "knowledge-agents," "citizen agents," and "market agents" (Cecchini & Harrits, 2022; Maynard-Moody & Musheno, 2022). However, divergence is often politically motivated (Bell et al., 2021; Davidovitz & Cohen, 2021; Hinterleitner & Wittwer, 2022; Manna & Moffitt, 2021; Stensöta, 2011). Recently, a growing literature highlights how street-level bureaucrats are citizens who react to highly politicized contexts (Peters et al., 2022): for instance, when facing a populist regime and democratic backsliding (Eiró, 2022; Hassan, 2021; Lotta & Fernandez, 2022), strong pressure from politicians and media (Hinterleitner & Wittwer, 2022), or when being discriminated against through ideological political rhetoric (Davidovitz & Cohen, 2021). In highly politically contested contexts, street-level bureaucrats may even work clandestinely against the wishes of their superiors (Lotta et al., 2022; O'Leary, 2019). We argue that this phenomenon can be understood as a distinct form of *political-ideological accountability*. Street-level bureaucrats also act as "political animals" (Aristotle, 1998) or "intuitive politicians" (Tetlock, 2002)—as engaged members of the democratic system who participate in formal political organizations or informal networks and relate to a broader community of citizens. Individual street-level bureaucrats are not neutral players but care about political and societal issues and have discrete political preferences.

As with the other four accountability regimes, political-ideological accountability pressures have external sources at the individual, organizational, and system level. Street-level bureaucrats give account to other citizens, political organizations and networks, and the political system that they were socialized into (Hinterleitner & Wittwer, 2022). This, in turn, will create the perceived expectations and pressure for the street-level bureaucrat to act in a way that facilitates outcomes that are in line with political, ideological, or ethical principles or preferences. Moreover, political-ideological accountability has an "internal" component when street-level bureaucrats subjectively

TABLE 1 Amended ARF as applied to the prevent duty.

Accountability regime	Political administrative	Professional	Participatory/societal	Market	Political-ideological
Main role of street-level bureaucrat	**State agent** Terrorism prevention	**Professional agent** Lecturer	**Citizen agent** Mentor	**Market agent** University employee	**Political animal** Citizen, voter
Accountable to whom?					
System	State/home office	Profession	Society	Market	Democracy /political system
Organization	Law enforcement	Lecturer Union	Student Union, HE institutions	Customers, shareholders, employer	Political organizations & networks
Individual	Managers/police	Peers	Clients (here: students)	Parents, managers	Citizens
Action prescriptions	**Rule pressure** *Formal rules* Implementing the Prevent Duty as intended to prevent extremism	**Professional pressure** *Professional norms* Defending academic freedom and delivering high-quality education, in accordance with the highest professional standards	**Participatory/societal pressure** *Client needs/expectations* Ensuring and delivering equal treatment, opportunity and mentoring to students	**Market pressure** *Efficiency, profit, attracting customers* Contributing toward the University's ability to compete for students and provide good value for money	**Political-ideological pressure** *Political and ideological principles* Acting in accordance with values, ideological principles, and political convictions
Through what processes is accountability ensured?	None or internal/department-level	Peer expectation & review	Feedback from students	Instructions from employer	Political considerations

Note: Adapted from Thomann et al. 2018.

attribute different degrees of importance to these norms and expectations in their daily work. Under political-ideological accountability, "political ideology… [influences] how bureaucrats will interpret information, especially in bureaucracies with multiple or vague missions" (Keiser, 2010, 249). Political considerations shape what actions a given street-level bureaucrat considers right, appropriate, or desirable (Bell et al., 2021).

In practice, multiple accountabilities may coexist and overlap, without being consciously distinguished by street-level bureaucrats themselves. The distinction of different accountability regimes is an ideal-typical heuristic that allows us to model the inherent hybridity of street-level implementation and its consequences for divergence.

Explaining street-level divergence with the ARF

While accountability dilemmas have been described for hybrid implementation modes (Sager et al., 2014; Thomann et al., 2016; Thomann & Sager, 2017; Thomann et al., 2018), neither the political-ideological accountability regime nor the implications of accountability dilemmas for divergence have been systematically analyzed yet. We amend the ARF from a descriptive framework into a compelling tool to explain the decisions of street-level bureaucrats to diverge from formal policies, see Figure 1. We assume that "the main issue is not only the existence of multiple [accountability] forums as such but the presence of conflicting demands between multiple forums or within a single forum" (Aleksovska & Schillemans, 2021: 711). Strong reference to multiple accountability pressures makes accountability dilemmas more likely; accountability dilemmas in turn tend to trigger divergence, as they require street-level bureaucrats to prioritize different roles and requirements that they care about.

Certain factors make accountability dilemmas more likely. We expect that if a lecturer has political preferences that contradict with the policy, then they should perceive their duty to implement the policy to be in conflict with political-ideological principles (Bell et al., 2021). For example, Prevent Duty is a policy that restricts civil liberties such as individual freedom and freedom of speech. If a lecturer values such liberties highly, then they are likely to express fear that that having to apply the Prevent Duty may cause them to compromise on political and ideological values (rule-political dilemma).

> **Hypothesis 1a.** Street-level bureaucrats with political attitudes that contradict with the policy (ideological distance) are likely to articulate a rule-political dilemma.

However, some lecturers may be very good at separating their work-related duties from political and ideological principles. Thus, we expect that personal political preferences should only reinforce a rule-political dilemma if it is important for a street-level bureaucrat to adhere to ideological principles and political convictions in their everyday work.

> **Hypothesis 1b.** Street-level bureaucrats with political attitudes that contradict with the policy are likely to articulate a rule-political dilemma, but only if they also strongly refer to political-ideological pressure.

Hypotheses 2 and 3 theorize the relationship between all types of pressures, related accountability dilemmas, and their subsequent effect on divergence. Hybrid implementation regimes, by involving a variety of actors, make it more likely that multiple and conflicting accountabilities exist (Thomann & Sager, 2017). Strong reference to one or several accountability pressures should generally increase the likelihood of tensions with rule pressure (Aleksovska & Schillemans, 2021; Hwang & Han, 2017):

> **Hypothesis 2.** Stronger reference to an accountability pressure other than rule pressure makes it more likely that the street-level bureaucrat experiences a dilemma of rule pressure with the respective action prescriptions.
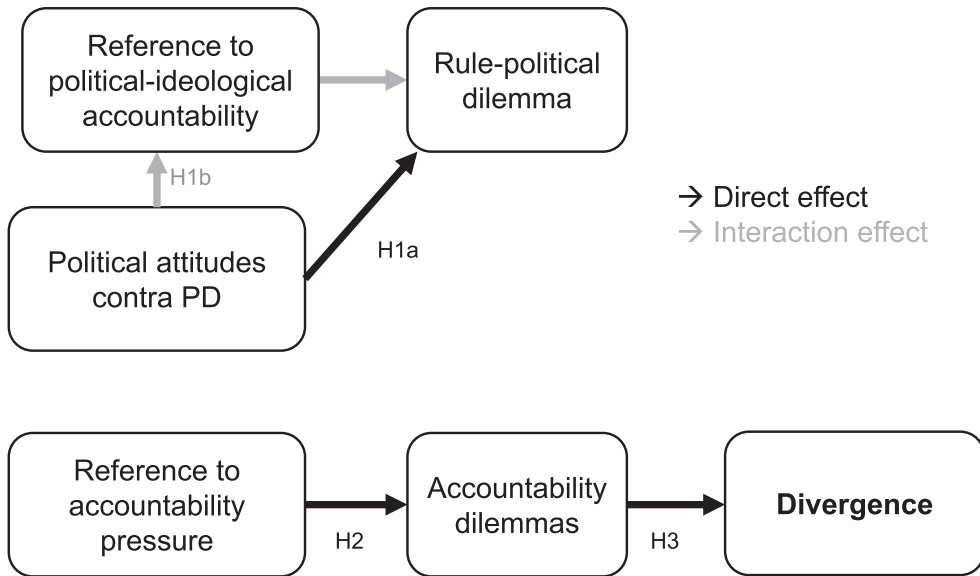
FIGURE 1 Explaining street-level divergence with the ARF. Source: authors' own illustration.

Crucially, we argue that *if certain action prescriptions create a dilemma with rule pressure, then this makes it more likely that the street-level bureaucrat diverges from the policy* (Aleksovska & Schillemans, 2021). If they experience a dilemma with rule pressure, then street-level bureaucrats need to "take sides" and decide which pressure they prioritize (Aleksovska & Schillemans, 2021; Hwang & Han, 2017). Consistent with role identity theory (Webeck & Lee, 2022), these decisions will tend to follow the extent to which they identify with a given accountability regime (Thomann et al., 2016)—naturally, considering the degree of discretion street-level bureaucrats have, their incentives, and other factors affecting street-level behavior. According to accountability theory, street-level bureaucrats have the motivation to gain approval of those audiences they consider as important, which helps them avoid negative consequences, build esteem, and gain power (Aleksovska & Schillemans, 2021; Tetlock, 2002). When multiple conflicting accountability pressures prevail, it thus becomes less likely that the street-level bureaucrats refer strongly to rule pressure (Aleksovska & Schillemans, 2021)—making divergence more likely.

> **Hypothesis 3.** The stronger or more numerous the dilemmas expressed by the street-level bureaucrat, the more likely they are to diverge from the policy.

We analyze the case of the hybrid Prevent Duty policy where a context of high discretion, ambiguity, and conflict renders it likely that informal and particularly political-ideological forms of accountability influence lecturers' behavior.

The prevent duty in British higher education

The UK's Prevent counterterrorism policy seeks to stop "people becoming terrorists or supporting terrorism" (HM Government, 2018, 8) by identifying those most at risk of radicalization "through early intervention […] and offering [them] support" (HM Government, 2018, 31). Since social science lecturers regularly discuss a variety of societal and political topics with students, they are more likely to discover those who harbor extremist thought. Requiring lecturers to monitor these interactions was therefore considered an effective way of preventing radicalization. In 2015, the CSA introduced new statutory requirements for public service, education, and healthcare institutions, including compulsory

staff training to recognize signs of radicalization and a legal obligation "to prevent people from being drawn into terrorism" (Counter-Terrorism and Security Act, 2015). Nearly all British universities have adopted the Prevent Duty by setting out processes that lecturers must legally follow if they suspect a student is undergoing a process of radicalization.[2] Often, a lecturer must report the student to a designated internal administrative figure called the "Prevent Duty lead," who convenes a broader panel of administrators to decide the appropriate course of action, which may include referring the student to the de-radicalization "Channel" program or contacting the police (Whiting et al., 2021).

Since student–teacher exchanges mostly occur away from external scrutiny, where radicalization is a relatively infrequent occurrence, this severely limits traditional means of administrative oversight for ensuring compliance with Prevent Duty (Brodkin, 2008). High levels of discretion for individual lecturers mean their sensitive observation and judgment determine how they decide to apply the regulation (Brodkin, 2008; Lipsky, 2010; Zacka, 2018). Moreover, the challenges associated with applying the concept of radicalization create high policy ambiguity. The distinction between "extremist" and "acceptable" speech is often the result of a subjective judgment call, rather than the application of an objective standard (Richards, 2011). Identifying radicalization in practice is difficult (Sedwick, 2010). The "risk factors" and associated behavioral changes that may suggest someone is being radicalized are often vague and not definitive. Finally, Prevent Duty has engendered strong political opposition (Lewis, 2018) due to concerns over academic freedom, freedom of speech, or the policy's adverse effects on discriminatory profiling (Gayle, 2019; Neal, 2019; The Muslim Council of Britain, 2016; University College Union, 2015). Lecturers vary from positive acceptance (Busher et al., 2019) to wide-ranging resistance (Awan et al., 2018) against Prevent Duty.

The combination of high discretion, conflict, and ambiguity renders Prevent Duty representative of the multiple accountabilities dominating policy implementation today (Aleksovska & Schillemans, 2021), and makes it likely that we observe a gap between the written policy and how street-level bureaucrats implement it (Gofen, 2014; Matland, 1995). Thus, if we find no evidence that accountability dilemmas influence divergence here, then the ARF must be discarded (Levy, 2007).

DATA AND METHODS

Our study relies on a sequential mixed-methods design that integrates the distinct strengths of both statistical and qualitative methods to support a single, unified inference (Seawright, 2016).[3]

In November 2020, we submitted a standardized, anonymous online survey questionnaire to British universities. Considering the likelihood of having to apply Prevent Duty, we restricted our sampling frame to all lecturers (i) in the social sciences, where the nature of the topics treated enhances the likelihood of a student expressing radical ideas during mentoring interactions; and (ii) whose contracts require student teaching or interaction. We gathered 24,309 email addresses of academic staff in British social science departments using web scraping of university webpages (software: Parsehub) and hand-coding. We received 1005 responses after we sent up to two email reminders to complete the survey. Estimating that about 14% were falsely contacted,[4] our adjusted response rate is about 4.8%. Our analysis focuses on those 809 respondents who have previously heard about Prevent Duty, a permanent or fixed-term teaching contract at a social sciences department, and some form of student contact.

Real-life encounters with Prevent Duty are rare, typically confidential, and overwhelmingly result in non-events. To measure the behavior of lecturers under Prevent Duty, the survey presents respondents with a fictional situation of a student that engages in moderately threatening behavior that, according to official Prevent Duty guidance,[5] should be reported. The scenario reads as follows:

> "Please consider the following scenario. You are having a conversation with a student of yours. The student tells you they have been browsing on a website of a group that is known for its approval of the use of violence or of illegal means, which it sees as unavoidable for

changing the existing societal order. The student expresses sympathy with the philosophy of the group and the readings promoted on that website, and speaks about the need to get involved in the cause."

The respondents were then presented with different options, such as reporting the student, talking to them in private, discussing the case with colleagues, or doing nothing. Not all of these behaviors are inconsistent with Prevent Duty, and we do not measure their sequence (Gofen and Weaver, Under Review). To measure divergence, as behavior that is inconsistent with policy directives, we asked respondents to indicate how likely they were to report the individual in the fictional scenario (which the Prevent Duty requires). It is rarely possible to observe sensitive behaviors directly. We, therefore, measure the intention to diverge a standard and successful measure particularly if it specifically relates to the planned behavior (Tummers et al., 2015). Moreover, our qualitative analysis (see below) specifically includes the real-life behaviors of lecturers. To minimize the potential effects of social desirability bias, we emphasized the anonymous nature of the survey both at the beginning of the questionnaire and in the email invitation.

Table 2 summarizes how we operationalized the different dependent and independent variables (Thomann et al., 2018; Tummers et al., 2012). Answers were recorded on 7-point Likert scales unless indicated otherwise. To test H1a and b, respondents who indicated opposition to sacrificing individual civil liberties and freedom of speech for the benefit of society were considered to have greater ideological distance with Prevent Duty.

We utilize ordinary least squares (OLS) regression for all models. Results using ordered logistic regression, reported in the online appendix, are fully in line with the OLS results. We control for relevant demographics (e.g., age, gender, years of teaching experience, and student contact), respondents' degree of familiarity with Prevent Duty, whether they had received any relevant training or previously experienced a situation where the policy was applicable. We varied randomly the ideology of the group (Islamist or right-wing extremism) and the mentoring relationship (Table S1). The experiment itself is not subject to this analysis. We control for the respondent's treatment group as accountability dilemmas, and implementation outcomes were measured *after* the experimental vignette.

The rationale of our mixed-methods design is to explore both general relationships and the specific descriptions and explanations of (groups of) cases (Richwine et al., 2022; Seawright, 2016). The qualitative part builds on the quantitative part both in terms of sequence and inferences. The survey helped us to recruit participants for qualitative interviews in order to strengthen our descriptive inferences and assess the plausibility of the statistical relationships. We use the qualitative data to validate the ARF and describe each accountability regime in practice, associated dilemmas, and how they link with divergence. This design allows us to corroborate and reinforce findings (by exploring "how" and "why" a certain phenomenon occurs) and to increase validity by supporting the operationalization of theoretical constructs (Mele & Belardinelli, 2019). The qualitative information we obtained about the accountabilities, dilemmas, and divergence behaviors of the street-level bureaucrats generally supports and deepens our statistical analyses, rather than challenging them.

Those 114 survey respondents (14%) who reported to have experienced a real-life situation where they either applied or could/should have applied the Prevent Duty policy could opt-in for conducting a confidential, anonymized interview with us ($N = 109$). Thirty-seven of them did confirm a date for an interview upon contacting them. Considering two no-shows, we conducted 35 semi-structured online interviews of between 20 and 60 min in May 2021, with transcripts ranging from 1959 to 8043 words. The questionnaire (Table S2) was designed based on the ARF to corroborate and complement the descriptive and causal inferences of the survey. It consisted of six questions about the lecturers' experience with Prevent Duty, their awareness and training received, their response to the experience, the motives underlying their choice of action, the perceived accountabilities and dilemmas, and their attitudes toward Prevent Duty. We specifically used the coding of interviews to identify concrete empirical manifestations of our main concepts (pressures, dilemmas) and identify suitable quotes to illustrate the previously identified statistical patterns and relationships. Each interview was coded by two independent, trained coders to ensure sufficient intersubjectivity. The full coding scheme, containing a mix of standardized codes and open copy–pasting

TABLE 2 Operationalization of dependent and independent variables.

Hypothesis	Variable	Operationalization
Dependent variables		
H1a, H1b, H2	Rule-political dilemma	I fear that having to apply the Prevent Duty may cause me to compromise on my political and ideological principles and values[a]
H2	Rule-professional dilemma	I fear that having to apply the Prevent Duty may cause me to compromise my standards of educating students and defending academic freedom[a]
H2	Rule-societal dilemma	I fear that having to apply the Prevent Duty may conflict with my commitment of providing equal treatment & opportunity, mentoring, and pastoral care to students[a]
H2	Rule-market dilemma	I fear that having to apply the Prevent Duty may conflict with our University's ability to compete for students and provide good value for money[a]
H3	Divergence: Likelihood to report	Having evaluated the scenario, how likely would you be to report the student though Prevent Duty protocol?[b]
Independent variables		
H1a, H1b	Ideological distance	*Government restrictions* It's right for the government to take restrictive measures on civil liberties to guarantee the security of citizens *Limitations speech* There should be limits on the freedom of speech of people who threaten society *(Likert scale reversed for composite scale)* *Individual freedom* Individual freedom is inviolable and must be maintained at all costs *Offensive speech* Even offensive speech is free speech that must be protected[c]
H2	Reference to political-administrative pressure	Implementing the Prevent Duty as intended to prevent extremism is a major priority in my daily work.[d]
H2	Reference to professional pressure	Defending academic freedom and delivering high-quality education, in accordance with the highest professional standards, is a major priority in my daily work.[d]
H2	Reference to participatory pressure	Ensuring and delivering equal treatment, opportunity and mentoring to students is a major priority in my daily work.[d]
H2	Reference to market pressure	Contributing toward the University's ability to compete for students and provide good value for money is a major priority in my daily work.[d]
H1b, H2	Reference to political-ideological pressure	Being able to act in accordance with my own values, ideological principles, and political convictions is a major priority in my daily work.[d]
H3	Rule-political, rule-professional, rule-societal, rule-market dilemmas	See above

[a]Please indicate your feelings toward the following statements on the scale provided, where 1 indicates strong disagreement and 7 signifies strong agreement with the statement.

[b]1 (extremely unlikely) to 7 (extremely likely).

[c]Composite scale of four items 1 (strongly disagree) to 7 (strongly agree). The Prevent Duty is coded as 1 on the scale (contrasting liberal views toward civil liberties). The ideological distance refers to the distance of lecturers views and the Prevent Duty on that scale.

[d]Thinking more specifically about your teaching role, please indicate to what extent you agree on a scale from 1 (strongly disagree) to 7 (strongly agree) with the following statements.

(Continues)

of illustrative quotes, is reported in Table S3. To ensure effective integration of both methodologies, we report the results of this content analysis and provide "typical" quotes as illustrative within-case evidence for each statistical pattern and relationship reported.

RESULTS

A descriptive analysis reveals some initial key characteristics of our sample (Tables S4, S5, and S16).[6] With respondents being 55.12% male and 41.40% female, being on average 48 years old and having 17 years of teaching experience, our sample is broadly representative of the composition in most British university departments, although academics with permanent contracts are over-represented.[7] The lecturers' political attitudes appear to be evenly distributed along the political spectrum (Table S8). The vast majority (78.61%) indicate they know about the Prevent Duty, with over half of all respondents— 59.09%—being at least somewhat familiar with the regulations (Table S6). However, a surprisingly large percentage of the lecturers (36.34%) report never having received training on the Prevent Duty (Table S7). This finding indicates institutional non-compliance with the Prevent Duty from parts of universities. Among those who reported having received training, most describe it as being "self-guided material provided by the university" (51.55%). Only 14.98% of the lecturers actually report having ever applied the Prevent Duty. Clearly, action under the Prevent Duty is a rare event in lecturers' professional practice. Many lecturers are only superficially trained and aware of what concretely the Prevent Duty requires them to do. Our analyses therefore control for the degree of familiarity with the policy.

Accountability and attitudes toward the prevent duty policy

Figure 2 reveals that most of the lecturers we surveyed do not see the implementation of Prevent Duty as a major priority in their daily work (89.7% rather-strongly disagree). The following interview quote illustrates a common attitude toward the Prevent Duty among lecturers:

> "If I'm thinking in terms of concentric circles here, my responsibilities to the government are probably on the outer circle. The outermost circle."
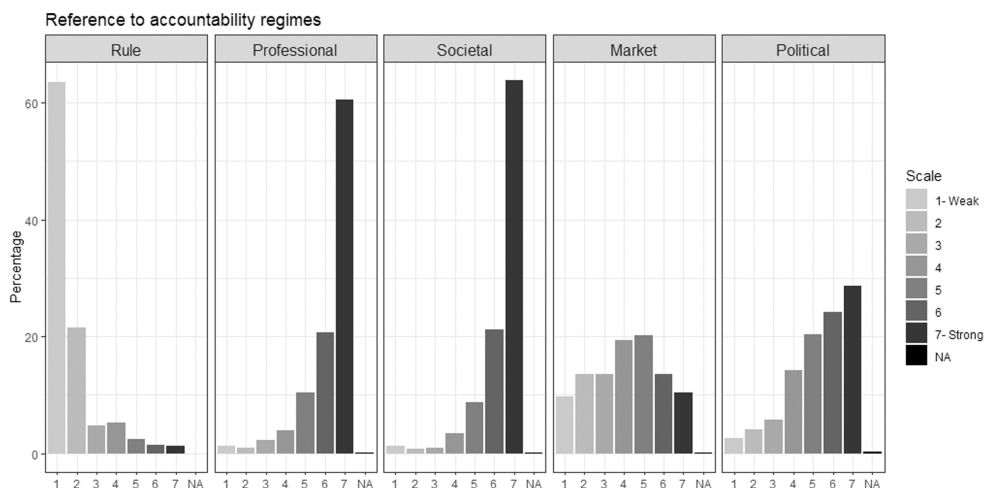
FIGURE 2 Reference to accountability pressures. *Note:* Survey questions see Table 2. Percent of respondents, $N = 809$, NA = 0.12%, 0.12%, 0.12%, 0.12%, 0.24%.

Being typical street-level professionals seeking to serve clients (Thomann et al., 2018), instead they prioritize the professional values of defending academic freedom and delivering high-quality education (91.47% rather-fully agree), and ensuring and delivering equal treatment, opportunity, and mentoring to students (93.57% rather-fully agree).

Lecturers as professionals and citizen agents consider these to be the essential elements of their daily work, as the following interview quotes illustrate:

> "The most direct and substantive component of my job every day is interacting with the […] hundreds of students that I take through courses and have done for the last 10 years."

> "The profession and responsibility as researchers and as academics, I think is more important than what the government decides our responsibility should be."

Moreover, lecturers are indeed political animals: For 73.17% of them, being able to act in accordance with values, ideological principles, and political convictions is a major priority in their daily work—and this is distinct from simply realizing their personal political preferences. The following interview quote illustrates this high importance of political-ideological accountability through the example of freedom of speech:

> "My own personal view is I abhor the far right and the ideology of the far right. But I think that they should have a platform to say what they want […]. I think as abhorrent as Islamist viewpoints are, […] there is a foundation that they should be allowed to say this stuff because actually then we can use the rule of law against them if we need to. That's what British values are."

Further, the Prevent Duty policy creates a rule-professional and a rule-societal dilemma for about half of the lecturers. Figure 3 suggests that the Prevent Duty potentially causes them to compromise on their standards of educating students and defending academic freedom (53.02% rather or fully agree) and of providing equal treatment, mentoring, and pastoral care to students (55.12% rather or fully agree).

The interviewees give examples of such dilemmas:

> "I think if I was […] organizing debates [related to being pro Palestine or anti-Israel], I would be thinking about Prevent […] And what it ends up doing, in my case, is some form of mild censorship."
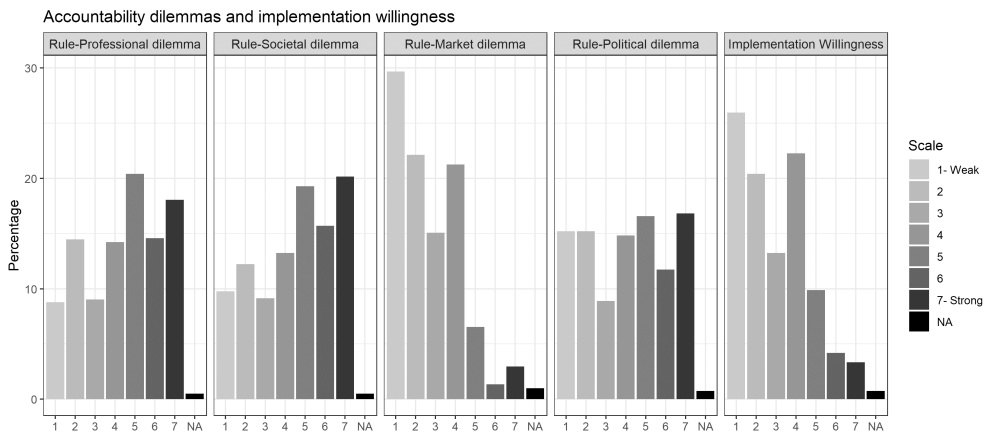

FIGURE 3 Accountability dilemmas and implementation willingness. *Note:* Survey questions see Table 2. Percent of respondents, $N = 809$, NA = 0.49%; 0.49%; 0.99%; 0.74%; 0.74%.

"[Students] are exploring what they think about things. [Our] job [is to encourage] them to push the boundaries and explore what they do think is right […] and then you are meant to be keeping an eye for when that seems to be working."

Conversely, only 10.88% perceive Prevent Duty to conflict with the economic success of the university (rather or fully agree). However, a rule-political accountability dilemma is evident: about 45.11% of the lecturers perceive that having to apply Prevent Duty may cause them to compromise on their political and ideological principles and values to some extent. Interviewees express this dilemma:

"I've been aware of it [Prevent Duty] for some years and […] I've watched how they've tried to rebadge it as something that […] is just as much about the far right as it is about whatever brown people, let's say. But obviously, I have not been convinced by that."

"I don't believe it to be applicable morally. […] I think the whole basis of it is just garbage."

Conversely, 39.30% of lecturers perceive no rule-political dilemma, as one interviewee says*:*

"My main contribution to the debate is to defend the Prevent strategy as being consistent with human rights, democracy, the rule of law and the legitimate interests of cosmopolitan society and to contest the opposite."

Overall, Prevent Duty faces a severe acceptance problem at the frontline. Only a small minority of the surveyed lecturers (17.43%) would be willing to put at least some efforts into implementing Prevent Duty. However, most interviewees said they would eventually apply Prevent Duty but only as a last resort, very reluctantly, or out of fear of being held accountable. One interviewee details their lack of willingness to apply Prevent Duty:

"I don't think I'm the right person to make that decision […] my response to not feeling qualified is certainly not to do it. It will make me less likely to do it rather than more."

Figure 4 illustrates how the lecturers responded to the vignette that represented a case of referral according to the official guidance. We find high levels of divergence: only a minority 24.10% of the respondents would formally refer the student, as for instance the following interviewee:

"Well if I came across anybody; colleague, student, […] that I thought was being at risk of being drawn into terrorism, I would have no hesitation in escalating that and referring it."
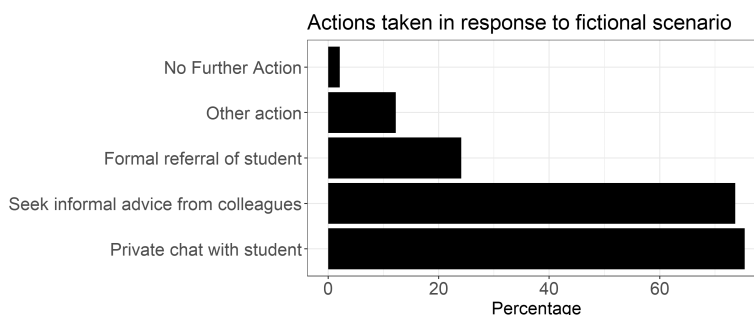

Actions taken in response to fictional scenario

FIGURE 4 Actions taken in response to vignette. *Note:* $N = 809$.

Instead, lecturers primarily prefer to proceed informally, for instance, by seeking advice from colleagues or other internal services (73.67%). One interviewee outlines why:

> "I would try to work out why I thought about that student or I would talk informally to a colleague. I think that [formal referral] would be so far down the list that there would be so many other things that would come into it first."

Many lecturers also prefer having a private conversation with the student (75.40%). They perceive this to be their crucial role as educators, by encouraging critical thinking and intellectual debate with students:

> "I would see my role as a lecturer as being part of the process of public critical education. To […] facilitate student learning and exposure of different ideas to enhance their critical capacity to interrogate their views and the values in society."

A simple correlation matrix (Table S16) lends initial support to the hypothesized relationships between rule pressure, accountability dilemmas, and likelihood to report. There are positive inter-relations between rule and market pressure as well as professional, societal, and political-ideological pressure, and between the different accountability dilemmas. Reference to rule pressure and to market pressure correlates negatively with accountability dilemmas, while strong reference to peer, societal, and political-ideological pressure goes along with stronger dilemmas. Can the ARF help us explain levels of divergence? The following analysis uses the likelihood to report the student as a dependent variable.

The ARF and street-level divergence

In line with our first hypothesis H1a in the first model in Table 3, we find that ideological distance—having political views that contrast with Prevent Duty—has a statistically significant positive effect on the perceived rule-political dilemma of the lecturer. The more value the lecturer places on civil liberties, the more likely they are to face a rule-political accountability dilemma. This dilemma is weaker for lecturers who have knowledge of Prevent Duty or prior experience in implementing it. Also, older lecturers do not perceive the political-rule dilemma as strongly as younger lecturers. One interviewee with no prior experience of Prevent Duty and high ideological distance experiences a rule-political dilemma along these lines:

> "I would have difficulties as a person who favors peace because I do not think that securitization of knowledge is good for peace. And maybe even greater conflicts I would have, as a Democrat, with the idea of the state controlling ideas and thinking, rather than controlling methods of political competition."

However, the interviews also support that in some cases, ideological distance does not create a rule-political dilemma, particularly when the lecturer has in-depth knowledge of and experience with Prevent Duty. A lecturer with previous knowledge and experience explains:

> "[Prevent Duty] is heavily weighted toward a suspicion and creating that suspicion between staff and students. [But] if I were to suspect that that person is in some group or being radicalized in those kinds of ways, I think I would […] make a referral to prevent."

The second model in Table 3 does not support our expectation (H1b) that ideological distance triggers a perceived rule-political dilemma only if the lecturer refers strongly to political-ideological accountability pressure. There is no statistically significant interaction effect of ideological distance and reference to

TABLE 3 Ideological distance affecting rule-political dilemma (H1a&b).

	DV: Rule-political accountability dilemma	
	H1a	H1b
	(1)	(2)
Reference to political pressure		0.403*** (0.129)
Ideological distance	0.452*** (0.070)	0.472** (0.220)
Gender (male)	−0.618*** (0.162)	−0.510*** (0.157)
Gender (other)	−0.911 (0.587)	−0.514 (0.569)
Age	−0.021* (0.011)	−0.021* (0.011)
Teaching experience	0.008 (0.012)	0.007 (0.011)
Prevent familiarity	−0.123* (0.068)	−0.145** (0.066)
Any prior experience	−0.450** (0.226)	−0.453** (0.218)
Student contact	0.040 (0.086)	0.034 (0.083)
Treat (Soc)	−0.052 (0.273)	0.011 (0.263)
Treat (Islamist)	−0.022 (0.271)	0.083 (0.263)
Treat (Right)	0.041 (0.268)	0.121 (0.259)
Treat (Islamist+Soc)	0.218 (0.273)	0.240 (0.265)
Treat (Right+Soc)	0.129 (0.278)	0.182 (0.268)
Political pressure × ideological distance		−0.015 (0.039)
Constant	4.059*** (0.677)	2.111** (0.949)
Observations	649	647
R^2	0.102	0.170
Adjusted R^2	0.084	0.151
Residual Std. error	1.981 (df = 635)	1.904 (df = 631)
F statistic	5.576*** (df = 13; 635)	8.645*** (df = 15; 631)

*$p<0.1$; **$p<0.05$; ***$p<0.01$.

political-ideological pressure. Having political views that contrast with Prevent Duty clashes with implementing Prevent Duty, even for lecturers who separate work from being a "political animal."

We generally expected that stronger reference to accountability pressures would trigger a respective dilemma with rule pressure (H2). Indeed, reference to professional, societal, and political pressure does increase the likelihood of the respective dilemma being present—but not for market accountability, see Table 4. In all three accounts, the effect is positive and statistically significant.

Interviewees give the following typical accounts of how reference to accountability pressures translates into rule-professional and rule-societal dilemmas:

> "The profession and responsibility as researchers and as academics, I think is more important than what the government decides our responsibility should be. […] [Prevent Duty] is incompatible with being […] somebody that you can confide in […] as a student.

> "I have to give the first priority in these working relationships to students. They are the ones one is there for, the ones one is teaching and helping to begin their adult lives and careers […] I didn't feel happy about being a sneak and reporting on my students."

The following interview quote illustrates how the desire to remain faithful to political values clashes with implementation of Prevent Duty:

TABLE 4 Reference to accountability pressures affecting accountability dilemmas (H2).

Reference to…	Dependent variable			
	Rule-professional accountability dilemma	Rule-societal accountability dilemma	Rule-market accountability dilemma	Rule-political accountability dilemma
	(1)	(2)	(3)	(4)
Professional pressure	0.361*** (0.062)			
Societal pressure		0.444*** (0.067)		
Market pressure			0.011 (0.034)	
Political pressure				0.389*** (0.050)
Gender (male)	−0.276* (0.154)	−0.293* (0.156)	−0.162 (0.125)	−0.436*** (0.160)
Gender (other)	−0.899 (0.558)	−0.831 (0.559)	0.271 (0.475)	−0.451 (0.581)
Age	−0.019* (0.011)	−0.023** (0.011)	0.018** (0.009)	−0.020* (0.011)
Teaching experience	0.015 (0.011)	0.013 (0.011)	−0.013 (0.009)	0.005 (0.012)
Prevent familiarity	−0.103 (0.065)	−0.106 (0.065)	−0.050 (0.053)	−0.146** (0.067)
Any prior experience	−0.176 (0.213)	−0.068 (0.214)	−0.159 (0.173)	−0.460** (0.221)
Student contact	0.141* (0.081)	0.184** (0.081)	0.014 (0.066)	0.095 (0.084)
Treat (Soc)	0.178 (0.260)	0.255 (0.261)	−0.139 (0.213)	−0.033 (0.270)
Treat (Islamist)	0.016 (0.256)	0.014 (0.257)	−0.126 (0.209)	0.049 (0.266)
Treat (Right)	0.091 (0.255)	0.105 (0.255)	−0.237 (0.208)	0.174 (0.265)
Treat (Islamist+Soc)	0.223 (0.260)	0.186 (0.261)	0.051 (0.212)	0.236 (0.270)
Treat (Right+Soc)	0.102 (0.264)	0.153 (0.264)	−0.092 (0.215)	0.224 (0.273)
Constant	2.549*** (0.727)	2.063*** (0.772)	2.268*** (0.525)	3.064*** (0.696)
Observations	655	655	653	653
R^2	0.077	0.103	0.018	0.129
Adjusted R^2	0.059	0.085	−0.002	0.111
Residual Std. error	1.883 (df = 641)	1.887 (df = 641)	1.533 (df = 639)	1.952 (df = 639)
F statistic	4.130*** (df = 13; 641)	5.674*** (df = 13; 641)	0.901 (df = 13; 639)	7.250*** (df = 13; 639)

$*p < 0.1$; $**p < 0.05$; $***p < 0.01$.

> "When I've looked at what [some what some UK politicians] have been saying about organizations such as Extinction Rebellion and these other ones, it just makes me think that, gosh, is this something that the UK government is branding as terrorists? [...] So personally I don't think it's something I would do anything about because I sort of disagree with the framing of it in those terms."

Older lecturers and those who are familiar with Prevent Duty are less likely to experience accountability dilemmas. Especially for the rule-political dilemma, prior experience in implementation reduces the perceived accountability dilemma ($p < 0.1$).

Our third hypothesis crucially stated that stronger accountability dilemmas are associated with higher levels of divergence (H3). The results in Table 5 strongly support this hypothesis. As the lecturers experience stronger accountability dilemmas, they become less likely to report the student. One interviewee expresses this relationship, illustrating how professional and political-ideological accountabilities can overlap in practice:

> "I don't care about Prevent. I just care about the people attending. And I wouldn't want the people attending to be subjected to any kind of horrible state intervention because of something that has been said or happened."

We find the same significant effects when testing the hypothesis using the number of dilemmas (from 0 to 4) or the sum of dilemma scores (from 1 to 16), indicating the existence and strength of multiple dilemmas (see Tables S9 and S10).

DISCUSSION

Using a sequential mixed-methods design (Seawright, 2016), we have extended the ARF and empirically tested how complex accountability relations, by creating dilemmas, translate into street-level divergence in the hybrid, politically contested, ambiguous Prevent Duty policy. The results from both the survey and the interviews give promising evidence for the explanatory power of the ARF. While other factors also affect implementation outcomes, our analysis is the first to demonstrate a robust empirical relationship between perceived accountabilities, dilemmas with rule pressure, and divergence. The case of the Prevent Duty mirrors typical street-level bureaucracies in that multiple accountability relations co-exist, whereas professional and societal accountabilities matter more for implementation outcomes than market accountability (Lipsky, 2010; Thomann et al., 2018).

We have argued that political-ideological accountability helps explain divergence because, as the literature increasingly recognizes, street-level bureaucrats are "political animals" whose political and ideological identity shapes their behavior (Bell et al., 2021; Davidovitz & Cohen, 2021; Hinterleitner & Wittwer, 2022; Manna & Moffitt, 2021; O'Leary, 2019; Stensöta, 2011; Thomann & Rapp, 2018; Zacka, 2018). Moving this literature forward, our results underline the role of political-ideological accountability in the street-level implementation of contested policies. The interviews further illustrate how the fact that street-level bureaucrats are "political animals" influences their stances toward the policy. For example, it matters for the willingness to implement Prevent Duty what the respondents perceive the greater purpose of the policy to be in the political system. If a lecturer understands Prevent Duty as a welfare issue meant to safeguard or protect vulnerable people, they can embrace its societal purpose. Usually, however, Prevent Duty is not viewed as a welfare issue as one interviewee puts it:

> "I think people still come away with an expectation that it's about catching the bad guys, not protecting vulnerable people from the bad guys."

When Prevent Duty is seen as a racist or discriminatory policy, this creates a rule-political dilemma that increases divergence. The same happens if it is interpreted as requiring spying or "snitching" or betraying

TABLE 5 Accountability dilemma affecting divergence (H3).

	Dependent variable: likelihood to report			
	(1)	(2)	(3)	(4)
Rule-professional dilemma	−0.454*** (0.033)			
Rule-societal dilemma		−0.439*** (0.033)		
Rule-market dilemma			−0.383*** (0.045)	
Rule-political dilemma				−0.399*** (0.032)
Gender (male)	0.237* (0.134)	0.192 (0.135)	0.328** (0.144)	0.163 (0.137)
Gender (other)	−0.724 (0.486)	−0.689 (0.489)	−0.417 (0.545)	−0.676 (0.495)
Age	0.009 (0.009)	0.009 (0.009)	0.025** (0.010)	0.010 (0.009)
Teaching experience	0.001 (0.010)	−0.003 (0.010)	−0.012 (0.011)	−0.004 (0.010)
Prevent familiarity	0.186*** (0.056)	0.182*** (0.057)	0.208*** (0.061)	0.176*** (0.057)
Any prior experience	−0.118 (0.185)	−0.086 (0.187)	−0.089 (0.200)	−0.204 (0.189)
Student contact	0.007 (0.071)	0.010 (0.071)	−0.064 (0.076)	−0.023 (0.072)
Treat (Soc)	0.185 (0.225)	0.222 (0.227)	0.095 (0.244)	0.075 (0.230)
Treat (Islamist)	0.357 (0.222)	0.354 (0.224)	0.361 (0.240)	0.355 (0.226)
Treat (Right)	0.508** (0.221)	0.486** (0.223)	0.367 (0.239)	0.454** (0.226)
Treat (Islamist+Soc)	0.528** (0.226)	0.498** (0.227)	0.463* (0.243)	0.507** (0.230)
Treat (Right+Soc)	0.386* (0.229)	0.375 (0.230)	0.289 (0.247)	0.367 (0.233)
Constant	4.170*** (0.564)	4.245*** (0.571)	2.929*** (0.593)	4.082*** (0.576)
Observations	656	656	654	655
R^2	0.264	0.254	0.148	0.235
Adjusted R^2	0.249	0.239	0.131	0.219
Residual Std. error	1.637 (df = 642)	1.650 (df = 642)	1.764 (df = 640)	1.669 (df = 641)
F statistic	17.740*** (df = 13; 642)	16.813*** (df = 13; 642)	8.540*** (df = 13; 640)	15.108*** (df = 13; 641)

*$p < 0.1$; **$p < 0.05$; ***$p < 0.01$.

the trust of students, or if it is perceived to undermine research in sensitive areas or academic freedom more generally. As one interviewee puts it succinctly:

> "Then the Prevent Duty says, 'well now I have to suspect my students and I have to scrutinize them, and I have a legal duty to report on them.' That sucks. It really is not conducive to good academic relations and it's incredibly corrosive of trust."

Older lecturers are less likely to experience accountability dilemmas. A potential explanation is that age comes with experience that serves as a decision heuristic in situations of ambiguity. Having comparatively greater clarity about what works best in such situations may help in prioritizing some accountability pressures over others and thus reduce the perceived tension between them.

Like all studies, ours has limitations. A low response rate during the first wave of the COVID-19 pandemic limits the external validity of our results. The scope of our results is currently limited to hybrid settings where a highly contested policy with a weak oversight regime indicates low levels of formal accountability, creating a context that makes it likely to observe the dynamics postulated by the ARF. From lecturers as street-level bureaucrats, we have learned that the ARF helps us explain divergence when multiple accountability pressures prevail and new tasks are added to existing ones. However, "evidentiary support for a theory from a most-likely case (…) provide only modest basis for generalizing"

(Levy, 2007: 202). In policy areas characterized by less ambiguity than Prevent Duty, street-level bureaucrats may be more prone to referring to rule pressure, which may result in fewer accountability dilemmas. When policies are less politically contested, the salience of political-ideological accountability should diminish relative to other accountability regimes; however, these dynamics may depend on the democratic context. In a context of democratic backsliding, for instance, political-ideological accountability may gain relevance independently of contestation (Eiró, 2022; Lotta et al., 2022). Future research should explore how the ARF helps us explain divergence in less likely cases of policies that concern core tasks of more "typical" street-level bureaucrats who are formally employed in the public sector. In such cases, divergence may generally be lower, for instance, due to high levels of public service motivation, but still subject to both formal and informal accountability relations.

Overall, our results highlight the high professionalism and service orientation of lecturers, as a universal feature of street-level bureaucrats. The ARF advances our knowledge on the link between accountability and policy implementation, while highlighting its political nature.

CONCLUSION

The faithful implementation of democratically decided policies can never be taken for granted (Gofen, 2014; Holland, 2016; Zacka, 2018). Rather, it is a question of discretionary decisions of policy implementers (Visser & Kruyen, 2021)—and therefore, of them being accountable for their actions (Hupe & Hill, 2007). Although the relational and informal nature of street-level accountability has long been acknowledged and recently been subject to more systematic analysis (Aleksovska et al., 2019; Keiser, 2010; Lieberherr & Thomann, 2019; Lipsky, 2010; Maynard-Moody & Musheno, 2022; Overman & Schillemans, 2022), our study makes three unique contributions to our understanding of how and why policies work in practice.

First, while recently systematic behavioral analysis has scrutinized implementers' motivations and perceptions of policies and accountabilities (Overman & Schillemans, 2022; Thomann et al., 2018; Tummers et al., 2012), our study moves the field forward by analyzing the consequences for what policy implementers (intend to) do (see Aleksovska et al., 2019; Assouline et al., 2022). Second, we fill the often cited theoretical gap in implementation research (Matland, 1995; Saetren, 2005, 2014). We propose the extended ARF as a theoretical framework to model street-level behavior and demonstrate that it actually works to explain why policy implementers diverge from contested, hybrid policies with weak oversight. The ARF adds much to existing literature because it allows us to capture not only apolitical, formal-hierarchical accountability arrangements in policy implementation but also informal accountabilities as subjective perceptions of social roles and corresponding relationships. The ARF models the inherent complexity of policy implementation through multiple, co-existing accountability relations. Most importantly, the ARF allows for not just description (as in Thomann et al., 2018) but for formulating concrete expectations about behavior. As such, we propose that the ARF can inform scholars of public accountability (Bovens et al., 2014) and street-level bureaucracy likewise to foster cumulative theoretical and empirical progress in research and practice (Moulton & Sandfort, 2017). For practitioners, analyzing the perceived accountability relations and potential dilemmas that underlie the implementation arrangement particularly of hybrid policies should be a routine step when seeking to make policies work.

Finally, our results add to existing evidence that street-level policy implementation is highly political (Bell et al., 2021; Lotta et al., 2022; Manna & Moffitt, 2021; Peters et al., 2022; Stensöta, 2011). The ARF, by modeling political-ideological accountability, is a useful tool to systematically describe and explain how street-level bureaucrats respond to policies that contrast with their ideological beliefs and how they operate in different political contexts. Indeed, SLBs may seek to "speak truth to power," limit perceived political influences, or avoid blame by diverging from formal policies through individual or collective practices (Bell et al., 2021; Davidovitz & Cohen, 2021; Eiró, 2022; Hassan, 2021; Hinterleitner & Wittwer, 2022; Lotta et al., 2022). Our results suggest that street-level bureaucrats may "correct" for what they perceive to be policies that stand at odds with their role, duties as political citizens, or

their own political beliefs. This implies that street-level bureaucrats have their own status as informal policymakers in the political system. Although street-level bureaucrats may thereby act in a way they believe to be consistent with the rule of law, minority rights, or democracy, these findings do raise important questions of integrity and legitimacy which are intimately linked to an accountability perspective (O'Leary, 2019; Zacka, 2018). As Seibel (2020: 155–156) points out, "harmonizing bureaucratic autonomy and institutional integrity requires commitment to public values that prioritize the protection of basic individual rights over temptations of pragmatic decision making (…) acting accordingly is a matter of 'active' as opposed to 'passive' responsibility in the sense of formal accountability." The ARF provides an analytic basis for more research to study the political nature of street-level bureaucracy and its link with accountability of administrative behavior.

ACKNOWLEDGMENTS

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ENDNOTES

[1] The Prevent Duty applies only to British higher education institutions in England, Scotland and Wales, but not in Northern Ireland.

[2] The Prevent Duty also has other implications for university activities e.g. when inviting speakers.

[3] This project received ethics approval by the University of Exeter.

[4] We drew a random sample of 96 contacts and coded their background by hand. 14 percent where irrelevant for our survey, indicating that the automated web scraping worked reasonably well.

[5] See https://www.elearning.prevent.homeoffice.gov.uk/edu/screen3.html?subsector=Lecturer [retrieved 24.10.2021]

[6] The following descriptive overview of the results was partly reported in https://blogs.exeter.ac.uk/ceg/blog/2021/03/03/mind-the-gap-troubled-implementation-of-the-prevent-duty-at-uk-universities/ [last access 10.3.2023]

[7] https://www.hesa.ac.uk/data-and-analysis/publications/staff-2015-16/introduction (last visit 21.12.2022).

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