

Dilemmas of joined-up government and privacy in the implementation of social policy

Results from a vignette survey among Dutch welfare benefit case workers

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ABSTRACT

Emphasis on recent policy ideas such as joined up government and stricter requirements in relation to citizens' privacy rights aggravate dilemmas that street-level bureaucrats are faced with. We explore how street-level bureaucrats respond to social policy dilemmas involving privacy and service integration and infer antecedents of these responses using analyses of a vignette survey administered to 301 municipal Dutch street-level bureaucrats working in social policy. We argue that street-level bureaucrats' professional orientation on clients' needs and emergencies affect behavioral responses to social policy dilemmas involving privacy and service integration and that clients' privacy interests are not yet an unequivocal part of street-level bureaucrats' attitudes and professional corpus.

KEYWORDS:

street level bureaucrats, GDPR, privacy, policy implementation

INTRODUCTION

The social policy implementation literature has emphasized that street-level bureaucrats apply discretion and construct justifications to fill the gap between clients' needs and requirements stemming from underspecified, incomplete or sometimes contradicting acts and schemes (Breit, Andreassen, and Salomon 2016, 709-728; Lipsky 2010; Van Berkel and Van Der Aa 2012, 493-510). Public administration scholars and researchers have argued that consequently, street-level bureaucrats continuously have to balance competing values such as (1) efficiency of implementation, (2) fairness of decisions, (3) responsiveness to clients' needs, and (4) respect in ways in which clients are dealt with (Zacka 2017). This balancing act is notably present in the subtitle of Michael Lipsky's seminal work on street-level bureaucrats: "dilemmas of the individual in public services" and subsequent authors have argued that street-level bureaucrats are granted discretion surrounded by restrictions (Hupe and Buffat 2014, 548-569) to adequately deal with these dilemma's. The degree to which street-level bureaucrats actually apply discretion varies according to individual (job experience, skills to identify procedural loopholes), organizational (degree of institutionalization of protocols) and institutional (type of welfare regime) variables (Maynard-Moody and Portillo 2011)).

Recent developments in social policy have – in new ways - aggravated dilemmas that street-level bureaucrats in social policy have to deal with. On the one hand, various national

contexts have displayed joined-up government initiatives with which it is attempted to adopt a more holistic perspective on clients and deliver seamless, one-stop services by intensifying information exchange across individual agency boundaries (Christensen, Fimreite, and Læg Reid 2014, 439-456; Lips, O'Neill, and Eppel 2011, 255-266). On the other hand, implementation of General Data Protection Regulation (GDPR) has confronted agencies in European countries (and the street-level bureaucrats working for these agencies) with the necessity to restrict gathering, processing and exchanging clients' personal information. These parallel, partly conflicting principles have resulted in debates among street-level bureaucrats, public managers and politicians in professional literatures and forums (Boogers et al. 2020). Until date, the academic literature has remained silent on whether and if so how (1) more holistic views on clients and (2) protecting clients' privacy rights are part of the street-level bureaucrats 'balancing act' (Lips, O'Neill, and Eppel 2011, 255-266; Bellamy et al. 2008b, 737-759; Busch and Henriksen 2018a, 3-28; Roux 2015, 227-244). This article explicitly addresses this issue and addresses the following research question: how do street-level bureaucrats respond to social policy dilemmas involving privacy and service integration and how can this response be explained? We focus on exploring antecedents of street-level bureaucrats' behavioral responses to dilemmas involving service integration and privacy. In so doing, we aim to extend and nuance – rather than replace – basic ideas of street-level bureaucrats' use of discretion.

We do this with qualitative and quantitative data gathered among street-level bureaucrats working in Dutch municipal social work agencies, more particularly those working in the field of the Unemployment Benefits Act (in Dutch: 'Werk en Inkomen', Participatiewet). In the Netherlands, since 2015, welfare policies in the fields of youth welfare, social support, and unemployment benefits have been decentralized from national and regional levels to municipal levels with the idea that municipalities are in closer contacts with their constituents and that therefore, municipalities are in a better position to reduce the administrative burden for clients and to improve welfare service integration than national agencies are. In 2018, European General Data Protection Regulation (GDPR) was implemented in the Netherlands by means of the AVG (Dutch: *Algemene Verordening Gegevensuitwisseling*), introducing stricter legal requirements (limited legal grounds) for gathering, processing, and exchanging clients' personal information. A notable change was that a client's informed consent was no longer considered a legal ground for processing personal information.

We discuss the theoretical basics of our study in the next section before we present our methodology. We then present empirical findings from a vignette survey among 301 Dutch municipal street-level bureaucrats. Finally, we discuss the theoretical implications of our study for the street-level bureaucracy literature and theories on dilemmas of joined-up government and client privacy.

STREET-LEVEL BUREAUCRATS, DISCRETION AND PRIVACY: INSIGHTS FROM THE LITERATURE

Discretion as a means to cope with dilemmas

Discretion is in general defined as the extent of freedom an individual can exercise when making choices among alternative courses of action or inaction (Evans A. 2010; Tummers

and Bekkers 2014, 527-547). In the context of street-level bureaucrats dealing with clients' needs and requests in social work agencies, discretion can be specified as the degree to which street-level bureaucrats have freedom to determine sort, quantity and quality of allowances, sanctions and rewards in the implementation of welfare schemes and acts. On the one hand, discretion can be viewed as a threat to the effectiveness and legitimacy of social policies as street-level bureaucrats may pursue personal preferences in implementing policies, and thus feature of policy implementation that should be eradicated by means of increased monitoring, control, and sanctioning. In general, however, the street-level bureaucracy literature (Lipsky 2010; Hupe Peter L. 2019) describes discretion as necessary leeway and a means of dealing with idiosyncratic clients' requests for support with street-level bureaucrats' time, money and other resources being restricted, and the use of discretion as a coping mechanism with which street-level bureaucrats attempt to deal with dilemmas they are faced with. An example of the use of discretion provided by Bellamy (Bellamy et al. 2008b, 737-759) is that a street-level bureaucrat specialized in dealing with drug addicts refused to comply with legitimate police officers' requests for sharing information on his client's addictions because the case worker assessed his task of assisting his clients was more important than being complicit in police officers arresting his client. Tummers and Bekkers have argued that discretion increases street-level bureaucrats' perception that social policies are in fact contributing to their clients' prospects and wellbeing, and therefore discretion is positively associated with street level bureaucrats' willingness to duly implement welfare schemes and acts.

The notion that discretion is a coping mechanism to deal with dilemmas does not imply that all street-level bureaucrats always use discretion in the same way. Zacka has argued that over time, partly due to learning that street-level bureaucrats experience through interactions with clients, street-level bureaucrats develop various frameworks of norms and expectations called 'dispositions' with which client information is filtered and with which interactions with clients are structured (Zacka 2017) (Table 1).

Disposition	Professional ethics' attributes	Potential Pitfall
'Indifferent bureaucrat'	Equality before the law, effectiveness, impersonal service delivery, emphasis on collective interests	Standardization at the expense of customization Case worker indifference / alienation Lack of responsiveness
'Caregiving advocate'	Citizen-centric service delivery, focus on customized services, emotional affection, emphasis on clients' interests.	May trigger client's dependence on case worker Paternalism Time-consuming approach, may jeopardize other clients' interests
'Enforcer'	Emphasis on potential abuse and fraud, low degree of emotional affection, emphasis on collective interests	Blindness for unique clients' needs Prejudice Lack of respectfulness

Table 1: Case worker dispositions (source: the authors, based on (Zacka 2017))

Discretion, technology, and privacy rules

It has been argued that modern information technologies, including the web of governance mechanisms and privacy norms in which these technologies are embedded, limit street level bureaucrats' discretion (Busch and Henriksen 2018b, 3-28; Bovens and Zouridis 2002, 174-184): as face-to-face interactions and human interpretations are increasingly replaced by automated decision making through algorithms, and technology makes surveillance of policy implementation outcomes and monitoring of the use of discretion relatively easy, it is assumed that street-level bureaucracy is gradually replaced by a screen- or system-level bureaucracy (Bovens and Zouridis 2002, 174-184).

The above line of reasoning, however, has been criticized for resting on a relatively simplistic technological determinist account, and for lack of empirical support. Buffat has argued that the adoption of new information and communication technologies in public administration triggers new norms, procedures, and rules (Homburg 2008), and it may depend on the street-level bureaucrat's preferences and skills to tinker with this new web of norms, procedures and rules, and either decrease or increase her or his set of coping behaviors to deal with dilemmas. For instance, ICT governance practices may obscure supervision of street-level bureaucrats by their supervisors, and newly introduced norms, procedures and rules may provide street-level bureaucrats with new loopholes, new ways in which clients are being transformed into legal-administrative categories, and sometimes new ways to manage the distance between bureaucrat and client (Buffat 2015, 149-161).

In conclusion, we state that applying discretion is a powerful way for street-level bureaucrats to deal with dilemmas they almost inevitably face, and that ICTs, including privacy rules and regulations that govern the use of these technologies, have resulted in new avenues for applying discretion to deal with dilemmas.

Antecedents of case workers' decision outcomes

Until now, the literature has been relatively silent on antecedents of how street-level bureaucrats use discretion to deal with dilemmas, and therefore we first discuss six correlates of case workers' decisions (Table 2).

It has been argued that an orientation on the clients' needs and requests is a key feature if not requirement for street-level bureaucrats, especially for those that implement welfare acts and schemes. Following Zacka (Zacka 2017), however, we argue that client orientation is a variable rather than a requirement, and that street-level bureaucrats that implement welfare acts and schemes, with street-level bureaucrats that fit the 'caregiving advocat' disposition display higher levels of client orientation than street-level bureaucrats that fit the 'indifferent bureaucrat' or 'enforcer' dispositions. Furthermore, we posit that street-level bureaucrats that fit the 'caregiving advocat' disposition (e.g., with higher scores on client orientation) are more likely to apply discretion to address idiosyncratic clients' needs and requests than street-level bureaucrats that fit the "indifferent bureaucrat' or 'enforcer' dispositions (e.g., with lower scores on client orientation) (van der Aa and van Berkel 2019). Our proposition is that the larger a street-level bureaucrat's client orientation, the larger the likelihood a street-level bureaucrat applies discretion to cope with service dilemmas involving privacy and service integration.

A second relevant correlate is inferred in relation to street-level bureaucrats' awareness of legal and organizational loopholes that allow for discretion. We posit that street-level bureaucrats' knowledge of legal and organizational loopholes, more particularly loopholes in relation to privacy regulations, affects a street-level bureaucrats' potential to apply discretion, and all other things being equal, also affects her or his use of discretion (Lips, O'Neill, and Eppel 2011, 255-266; Bellamy et al. 2008a, 737-759). We therefore formulate the proposition that the larger a street-level bureaucrat's privacy regulation knowledge is, the larger the likelihood a street-level bureaucrat applies discretion to cope with service dilemmas involving privacy and service integration.

A third correlate is derived from a top-down perspective on discretion (Bovens and Zouridis 2002, 174-184; Buffat 2015, 149-161). In such a perspective, discretion is valued negatively, and interpreted as a kind of behavior displayed by street-level bureaucrats that is to be suppressed by means of surveillance and control measures. We posit that perceived organizational sanctions on rule breaking and rule bending may work as a disincentive for street-level bureaucrats to apply discretion, and formulate the proposition that the more street-level bureaucrats perceive sanctions to be a real and existing measure in the organizations they work for, the less the likelihood a street-level bureaucrat applies discretion in order to cope with service dilemmas involving privacy and service integration (Straub Jr. 1990, 255-276; Siponen and Vance 2010b, 487-502; D'Arcy, Hovav, and Galletta 2009, 79-98; Willem and Buelens 2007, 581-606; Odom 2014).

Fourthly, we follow information security enforcement studies in assuming that the more the value of privacy and information security is being paid attention to in – and is arguably part of the culture of – the organization the street level bureaucrat works for, the less opportunities there are for applying discretion (Siponen and Vance 2010b, 487-502; Moody, Siponen, and Pahnla 2018, 285-311; Siponen, Pahnla, and Mahmood 2010, 64-71). We therefore posit that the more an organization a street-level bureaucrat works for values a climate of information security and privacy, the less the likelihood a street-level bureaucrat applies discretion in order to cope with service dilemmas involving privacy and service integration.

As a fifth correlate we identify the degree to which service integration is valued in the organization the street-level bureaucrat works for. We posit that if service integration is valued, street-level bureaucrats may perceive applying discretion as more legitimate than if service integration is not valued (Keiser 2010, 247-257). Therefore, we formulate the proposition that the more an organization a street-level bureaucrat works for values integrated service delivery, the larger the likelihood a street-level bureaucrat applies discretion to cope with service dilemmas involving privacy and service integration.

As a sixth correlate we focus on administrative burden. We assume that one way or the other, any application of discretion needs to be accounted for professionally or hierarchically, and that the effort this requires may work as a disincentive for applying discretion (Cress and Kimmerle 2008, 105-122; Albrechtsen 2007, 276-289; Ardichvili, Page, and Wentling 2003, 64-77). We therefore posit that the larger the administrative burden that characterizes the organization a street-level bureaucrat for, the less the likelihood a street-level bureaucrat applies discretion to cope with service dilemmas involving privacy and service integration.

Antecedent	Sources	Description
Client orientation (+)	(van der Aa and van Berkel 2019)	Degree to which a case worker fits the 'caregiver advocate' disposition and prioritizes the client's perspective in her or his assessment of the client's request or emergency
Privacy regulation knowledge (+)	(Lips, O'Neill, and Eppel 2011, 255-266; Boogers et al. 2020; Bellamy et al. 2008a, 737-759)	Perceived knowledge of privacy rules and regulations, and/or perceived access to organizational resources that may be used to answer case workers' privacy-related issues or questions
Sanctions (-)	(Straub Jr. 1990, 255-276; Siponen and Vance 2010b, 487-502; D'Arcy, Hovav, and Galletta 2009, 79-98; Willem and Buelens 2007, 581-606; Odom 2014)	Perception of sanctions that may be imposed in organizations on case workers that violate [whatever] rules
Value of information security and privacy (-)	(Siponen and Vance 2010b, 487-502; Moody, Siponen, and Pahnla 2018, 285-311; Siponen, Pahnla, and Mahmood 2010, 64-71)	[Perceived] attention that is being paid to issues related to information security and privacy in the organization the case worker is working for
Value of integral service delivery (+)	(Keiser 2010, 247-257)	[Perceived] attention that is being paid to issues related to client orientation and integral service delivery in the organization the case worker is working for
Administrative burden (-)	(Cress and Kimmerle 2008, 105-122; Albrechtsen 2007, 276-289; Ardichvili, Page, and Wentling 2003, 64-77)	[Perceived] effort of registering data to account for any non-routine activities.

Table 2: Correlates of social workers' application of discretion likelihood

Apart from the correlates, we identified gender and age as controls.

RESEARCH DESIGN, DATA AND METHODS

A three-stage approach

To answer the research question, we adopted a three-stage approach, by means of which we were able to blend a committed immersion in the field of social work street-level bureaucrats and their day-to-day challenges, with a more distant observation of antecedents of individual street-level bureaucrats' behavioral responses to specific dilemmas. The *first* stage consisted of a series of 17 qualitative interviews with street-level bureaucrats and middle managers from eight municipal welfare organizations in the Netherlands. Interviews lasted between 45 and 75 minutes and were relatively open and unstructured. All interviews were transcribed, and structured qualitative coding techniques were applied to identify perceived service delivery dilemmas and motives to arrive at specific decisions in complex client requests or emergencies. In the *second* stage, a survey was administered to a larger group of street-level bureaucrats. Respondents were

presented three dilemmas in a questionnaire and asked to respond to the dilemmas; furthermore, respondents were asked to respond to items by means of which correlates were measured. The *third* stage consisted of a series of qualitative expert interviews, a smaller expert group meeting (three experts) and a larger expert group meeting (35 experts) by means of which interpretations were discussed refined, and an overall reflection took place.

The case for a vignette study

One challenge of answering the research question is how to adequately measure behavioral responses to dilemmas. As the use of generic, non-contextualized and abstract survey items like 'I would sometimes violate a client's rights to privacy' would arguable display validity concerns due to social desirability bias (Wallander 2009, 505-520; Steiner, Atzmüller, and Su 2017) and a lack of specification of the exact circumstances or conditions privacy rights would be violated in (Steiner, Atzmüller, and Su 2017), we opted for presenting respondents with dilemmas in short stories about hypothetical protagonists who display specific behaviors in specified circumstances (called 'vignettes') (Harrits 2019, 392-408), and asking respondents in what degree they would mimic the protagonist's behavior if they were confronted with the same situation. This method is described as a non-threatening way of registering respondents' behaviors that would otherwise compromise respondents' or their clients' confidentiality (Harrits 2019, 392-408). Furthermore, if vignettes are included in questionnaire with items with which antecedents are measured, this method allows for identifying patterns between antecedents and responses to vignettes.

In vignette studies, validity largely depends on the realism and authenticity of the depicted situations. We translated interviewees' narratives recorded in the first phase of our design into vignettes and *ex ante* verified the appropriateness of the vignette contents in separate interviews with two experts with knowledge at the corner stones of social policy legislation and implementation practice. Furthermore, to allow for an *ex-post* check on validity, we asked respondents to rate the realism of the situation depicted. In so doing, three vignettes ('eviction threat', 'check on whereabouts', and 'check on attendance') were constructed and realism scores yielded satisfactory results. Table 3 shows that contexts and decisions were described in concise narratives (to strengthen ecological validity and strengthen respondents' engagement, (Harrits 2019, 392-408)). As it was our intention to study how dilemmas were dealt with, we did not include too many details of formal procedures and/or expert opinions to prevent the vignette to become predetermined and trivial. In other words, the dilemmas phrased in short stories were still ambiguous enough to allow for various degrees with which respondents could indicate whether they would act as the protagonist did in the depicted situation, if they were confronted with a similar situation.

Vignettes were phrased in the Dutch language; protagonists and clients were given gender-neutral (Dutch) names: Marijn for the case worker, Robin, Charly, Elvin and Deniz as names for clients or stakeholders.

Label	Vignette (shortened version)	Respondents' perceived realism score (scale of 1-5)	% Respondents 'agreeing' or 'totally agreeing' this is a realistic situation
Eviction threat	Marijn is able to prevent an eviction by sharing client's financial details with a public housing association's representative. Marijn suspects this is in violation of privacy regulations but chooses to share the information.	M = 4.22, SD = .76	91.4%
Check on 'whereabouts' based on ATM cash withdrawals (bank statements)	Marijn suspects client Charly is residing in another location than in his official address and asks Charly to submit bank accounts for the purpose of finding out whether ATM withdrawals reveal Charly's actual, likely whereabouts.	M = 4.08, SD = .96	82.7%
Check on attendance during training sessions	Marijn suspects client Elvin is shirking training activities and decides to contact the provider and ask about Elvin's attendance record.	M = 4.20, SD = .69	92.4%

Table 3: Vignettes and perceived realism scores

Measurement

Respondents were asked to respond to each of the vignettes in three ways. First, for verification and validity testing purposes, respondents were asked to indicate the realism of the situation in the vignettes on a single Likert item (see Table 3). Second, for the purpose of measuring how respondents respond to dilemmas, respondents were asked (using a single Likert item) to which degree they were certain they would have done the same as Marijn (the protagonist in each of the vignettes) if they were confronted with a similar situation (for results, see Table 5). Third, respondents were asked to – in a couple of words or sentences – motivate their response to the vignette.

Client orientation was measured using a single item Likert item ('In general I prioritize personal attention in the way I deal with clients') (van der Aa and van Berkel 2019). Privacy regulation knowledge was measured using two Likert items referring to perceived legal knowledge and access to legal resources. Sanctions were measured using four Likert items (Moody, Siponen, and Pahnla 2018, 285-311; Siponen, Pahnla, and Mahmood 2010, 64-71). Value of information security and privacy, and Value of integral service delivery were measured with three and two Likert items, respectively (Moody, Siponen, and Pahnla 2018, 285-311; Siponen, Pahnla, and Mahmood 2010, 64-71). Administrative burden was measured using three Likert items (Moody, Siponen, and Pahnla 2018, 285-311).

Sample characteristics of the vignette survey

In the Fall of 2020, invitations to complete an online questionnaire were distributed in 15 municipal welfare service organizations and responses from 301 respondents from 11 organizations could be gathered. Of all respondents, 29.2% identified with the male gender and 69.7% with the female gender. The mean age was 45.4 year (SD = 11.2 year). The average job residence time was 8.6 year (SD = 8.5 year). More than half of the respondents reported having a professional background in social work (Table 4).

Professional background / education		
Social work		175 (58.2%)
Economics / marketing		30 (10%)
Social sciences		20 (6.6%)
Other (re-coded)		
	HRM	15 (4.9%)
	Legal	10 (3.3%)
	Secondary education	8 (2.6%)
	Public Administration, Business Administration	7 (2.3%)
	Other, miscellaneous	36 (11.9%)

Table 4: Professional backgrounds / education in sample

RESULTS

Descriptives and correlates

Table 5 summarizes the respondents' responses to the vignettes as well as the scores on the correlates we measured with the questionnaire.

	M (SD)	1	2	3	4	5
Gender (1=female)	0.72					
Age	45.5 (11.2)					
Eviction – similar reaction	3.12 (1.22)					
Whereabouts – similar reaction	3.17 (1.42)					
Attendance – similar reaction	3.54 (1.12)					
1. Client orientation	4.37 (.63)	1				
2. Privacy knowledge	3.61 (.74)	-.109	1			
3. Sanctions	3.28 (.62)	-.026	.257**	1		
4. Value of info sec privacy	4.08 (.58)	-.133*	.459**	.375**	1	
5. Value of integral services	4.08 (.61)	-.099	.146*	.127*	.213**	1
6. Administrative burden	3.30 (.91)	-.029	-.162**	-.035	-.021	.051

Table 5: descriptives and correlates (* = $p < 0.05$; ** $p < 0.01$; *** $p < 0.001$)

The variance of responses to vignettes (measuring whether respondents would have done the same if they were confronted with a similar situation) further confirm that the vignettes depict dilemmas with respondents both agreeing and disagreeing with the vignette protagonist's course of action.

	EVICTION		WHEREABOUTS		ATTENDANCE	
	Model 1	Model 2	Model 1	Model 2	Model 1	Model 2
Gender	-.108	-.103	-.131*	-.114	-.035	-.040
Age	.047	.058	.008	.026	-.080	-.106
Client orientation		.134*		-.198**		.145*
Privacy knowledge		-.024		.024		.102
Sanctions		-.103		.041		-.033
Value of info sec privacy		-.162*		-.027		-.098
Value of integral services		-.071		.068		-.114
Administrative burden		-.029		-.117*		.107
F	2.244	3.202**	2.617	3.131**	1.003	2.256*
R²	.015	.082	.018	.081	.007	.059

Table 6: regression results (* = $p < 0,05$; ** $p < 0,01$; *** $p < 0,001$)

Table 6 presents the results of a regression analysis of correlates and responses to the three vignettes used in the study to measure respondents' reaction to social policy dilemmas involving privacy and service integration.

If we analyze the responses across all vignettes, the only consistent pattern that emerges from the quantitative data is that controlling for all other variables, the street level bureaucrats' orientation towards clients' needs and emergencies correlates with the use of discretion to cope with dilemmas. Privacy knowledge, sanctions, a perceived organizational climate that fosters information security and privacy, a perceived organizational climate that fosters integral services, and administrative burdens did not impact street-level bureaucrats' use of discretion. Furthermore, no difference between organizations could be found for responses to vignette 1 ('eviction', ANOVA, $F = .862$, $p = n.s.$) and vignette 3 ('attendance', ANOVA, $F = 1.701$, $p = n.s.$); the responses to vignette 2 ('whereabouts') did significantly vary across organizations the respondents are affiliated with (ANOVA, $F = 10.773$, $p < 0,001$).

To better understand respondents' balancing acts and motivations for either or not applying discretion to deal with dilemmas, we coded answers to the open question asking respondents to motivate their decisions in a few words or sentences (Table 7).

<i>Reported reasons for agreeing (recoded)</i>	Frequency	<i>Reported reasons for disagreeing (recoded)</i>	Frequency
EVICTION VIGNETTE			
It is in the client's best interest	98	Have the client deal with it	150
Assuming client's implicit consent	74	Not my responsibility	10
It is in collective interest of society	26	Set up tripartite meeting instead	8
Privacy regulations are complex	4	Violates privacy regulations	8
Problem can be fixed proactively	2	First ask privacy expert	2
WHEREABOUTS VIGNETTE			
Valid reasons, happens a lot	73	Is an issue for enforcement officers, not for me	38
This is standard practice	1	Abuse / unfair	24
		Ask client first	11
		Inappropriate behavior	9
		First ask colleague / expert	5
ATTENDANCE VIGNETTE			
This is required / legitimate OR I'll give it a try	91	Not without client's informed	21

and see what happens		consent	
There is a legal ground	14	School will not cooperate so don't bother	8
Assuming client is present	6	Not allowed	4
		First ask privacy expert	2

Table 7: reported motives in relation to the vignettes

From the motivations of the responses to the eviction vignette, we infer a primary distinction between the 'agreeing' motivations signaling identification with the client's interests ('it is in the client's best interest, assuming the client would agree, it is in the collective interest) and the 'disagreeing' motivations signaling a professional or personal distance from the client interest ('have the client deal with it', 'not my responsibility'), and this distinction may be stressed to underline the impact of 'client orientation' on street level bureaucrats' use of discretion to deal with dilemmas. The motivations of decisions in the whereabouts- and attendance vignettes suggest respondents' identification with enforcement, although the pattern is less clear.

CONCLUSION AND DISCUSSION

This study has focused on Dutch street-level bureaucrats' handling of professional dilemmas in relation to privacy and information exchange when interacting with clients. We adopted a three-stage approach (exploration through qualitative, open interviews with case workers; vignette survey; expert interviews and expert meetings) to identify patterns by means of which social workers' reactions to dilemma's could be explained. In the survey, we presented 301 case workers with three dilemmas and regressed respondents' client orientation, privacy knowledge, perceived value of privacy and security, perceived value of integral services, and administrative burden with respondents' reactions to dilemmas and found that of these variables, only the street-level bureaucrats' orientation on clients' specific needs is associated with the application of discretion to cope with privacy dilemmas.

Results of data analysis suggest that street-level bureaucrats that implement welfare acts and schemes primarily balance client orientation and application of discretion: those street-level bureaucrats that display higher levels of client orientation are more likely to apply discretion, and with that, to render privacy regulations inoperative, than those street level bureaucrats that display lower levels of client orientation. Analysis of motivations that were given by respondents suggest that if street-level bureaucrats that fit the 'caregiving advocate' type are confronted with dilemmas involving privacy and service delivery, they are likely to render privacy norms inoperative. This pattern fits the notion of 'neutralization' that has been described in sociological literatures, and more specifically in the information security literature (Barlow et al. 2013, 145-159; Siponen and Vance 2010a, 487-502; Sykes and Matza 1957, 664-670). Neutralization generally refers to how individuals refer to justifications to render specific norms inoperative, or prioritize specific norms over other norms, if these individuals have to cope with competing norms that cannot be easily reconciled; street level bureaucrats that implement social policies are reported to have to 'juggle' with competing norms of responsiveness (adequacy in addressing clients' needs), justice (an eye for collective interests), efficiency (an eye for managing one's workload of a multitude of clients) and respect (including taking into account clients' dependence on the case worker or the department she or he represents).

In relation to the original motivation of this study (case workers' outcry that privacy rules render their day-to-day activities and interactions with clients difficult), there are various issues that merit a further discussion.

The first issue is the observation that the inherent norm of clients' privacy is – until now – hardly an accepted, explicit, and agreed-upon part of frames of references of individual street-level bureaucrats that implement social policies, or of the *professional corpus* of norms and values that social workers generally take into account due to training and experience. If professional and academic literatures ((Lips, O'Neill, and Eppel 2011, 255-266; Roux 2015, 227-244; Maynard-Moody and Musheno 2003) with Zacka's conceptual framework being a case in point) pay attention to information sharing and privacy, then privacy is often depicted as a norm that stands in the way of service quality, rather than as a value that is relevant for clients' wellbeing and life quality (comparably with, for instance, the notion that physical integrity is a rather absolute norm). Consistent with the work of professionals and ways in which professionals innovate and develop skills, this asks for an actual reflective conversation in professional bodies on how the value of privacy should be dealt with in relation to responsiveness, justice, efficiency, and respect.

The second issue, somewhat related to the first one, is that our empirical study has documented a variety of standards – either from bureaucratic or professional origin – being applied by street-level bureaucrats in their interpretation of and reaction to dilemmas. Now a lack of strict *bureaucratic* standards may be a normatively desired state of affairs, if it is not substituted or compensated by professional standards, this may render social policy implementation susceptible to criticism of arbitrariness, and clients vulnerable to infringement of privacy rights. This underlines a plea for a conversation among professionals about how the norm of privacy fits other professional norms in the development and implementation of welfare policies, and how the value of privacy should be incorporated in case workers' initial training programs, and case workers' professional bodies' activities.

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