ACCOUNTABILITY FROM THE GRAVEYARD OF GOOD INTENTIONS: THE PARADOX OF STREET LEVEL BUREAUCRATIC BEHAVIOUR IN THE TEACHER VALIDATION POLICY IMPLEMENTATION IN THE AMPABAME WEST DISTRICT OF GHANA

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ABSTRACT: *The failures of NPM-inspired ideas to address classic challenges to public administration, and the way NPM subsequently created new dysfunctions in bureaucratic activities inspired this paper to scrutinize and decide which theoretical components in this field deserve to be retained, and which should be abandoned. This is motivated by public concern to find practical solutions to policy implementation problems and not any conviction that, somewhere out there, there is a new 'grand theory' that needs to be discovered. The implementation of the teacher validation policy in Ghana is used in this study to illustrate some of the challenges in public administration that require scholars to make use of the wide range of analytical tools already available. This is done through a study of how frontline agents for the teacher validation policy at the local education offices exercise discretion in the course of implementing the policy. For conceptualization purposes, this paper used the street level bureaucratic theory which is an offshoot of the principal agency theory and argues that the theory remains an increasingly popular approach to the analysis of public administration when linked with a set of other theories such as discretion and accountability. This is a qualitative research that used interviews, focus group discussions and documentary evidence to collect data from a sample size of 31 out of a population of 49. The study used the grounded theory framework to analyse the data, and found out that frontline agents are the ultimate makers of the teacher validation policy but concludes that it is important to constrain their discretions in order to bring accountability to discretionary judgements.*

KEYWORDS: bureaucratic control; policy rule framework; street-level bureaux; professional judgement; moral hazard; adverse selection.

INTRODUCTION

> *"Just as fish moving inside water cannot be known when drinking water, even so officers appointed for carrying out works cannot be known when appropriating money".*
> &
> *"It is possible to know even the path of a bird flying in the sky, but not the ways of officers moving with their intentions concealed" - Kautiliya (of the Gupta Empire in his writing – Arthaśāstra, around 300 BCE)*

Bringing an understanding to what makes people do 'the right thing' in public administration – even when no-one is looking – presents a formidable challenge to the New Public Management (NPM) regime. However, the NPM models that are still used in the 21st Century seem to take the issue further away from working solutions at least theoretically, although in practice NPM has survived (Pollitt, 2014). Thus, the NPM is criticized in public debate for providing perverse incentive structures, overwhelming and ineffective evaluation structures, a dehumanizing work environment, and for de-professionalizing a number of occupations in the education just like other sectors.

Consequently, one of the most important illustrations of the extent to which the NPM is bogged down is manifested in the prominent role of the Principal-Agent Theory (PAT) in the teacher validation policy (TVP) which is firmly rooted in the Rational Choice theory, and it is used today in public administration studies and more specifically in areas of governance and corruption studies in relation to public sector frontline workers (policy implementers). The role of frontline workers in the policy process has been a subject of emotive debates for several centuries as argued by Kautiliya of the Gupta Empire in 300 BCE. This paper takes a view that the role of frontline workers is purely technical and it involves the implementation of government directions as contained in the statutes. Consequently, administrative success from this point of view is the extent by which frontline workers maintain fidelity to the policy maker's ambitions. In order to realise the aforesaid fidelity, the managerial school emphasises a variety of ways to control administrative discretion.

Scholars from the bottom up policy implementation model have argued that the behaviour of frontline workers is intricately political due to the notion that public policy process is a market place of ideas. This suggests that politicians usually fail to agree on the policy objectives and how these may be attained. This enervating problem is often passed on to the frontline workers who must deal with the challenge of having to implement policies with ambiguous objectives and sometimes undefined goals. These leave frontline workers to interpret the statutes, decipher policy goals and objectives and put up measures in order to achieve the policy goals through the use of discretion which usually undermines bureaucratic control of policy implementation. This stems from the fact that frontline workers who normally come from diverse background also experience

diverse problems which cannot all be legislated and integrated in the policy rule framework. Discretion therefore becomes one of the ways in which frontline workers tend to cope with the gap between the legislative mandate, environmental demands and resource availability.

This exigency gives policy makers and bureaucratic executives weak control over street level bureaucrats. Lipsky (1980) developed the concept 'street-level bureaucracy' to capture the discretion exercised by public administrators at the lower levels of public governance structures especially at the policy implementation level. "The concept refers to the decisions, routines, and devices that administrators make, establish, and invent in order to cope with uncertainties and work pressure" (Lipsky, 1980). This results in de facto policies, made 'on the street', and which tend to offset as well as reinforce or redirect what was initially intended by the original policy.

The substantive issues underpinning the above discussion are that Teacher absenteeism poses a major challenge across the various levels of education in Ghana. Its implications are wide-ranging: from inhibiting student attendance to student achievement (Van Keuren, 2009). These can also have broader negative effects on an entire school system - that is from damaging school reputations to economic losses for the country (see Van Keuren, 2009). There are many factors that cause teacher absenteeism in schools especially in the Ampabame West District of Ghana. These include economic reasons, weekend-end travels, domestic problems, transportation difficulties, school climate and the culture of absenteeism (see Sekyere, 2010).

These practices have caught the attention of the government of Ghana and have consequently taken measures to stop same behaviour by matching teacher attendance with salaries, in order to regulate teacher attendance and restore integrity to the teacher payroll system. In line with this policy, the Ministry of Finance has issued guidelines to the Ministry of Education, its Departments and Agencies that defines new procedures for salary payments. This is the TVP. The validation process takes place in Ghanaian schools every month to confirm teacher attendance in order to remove absentee teachers from Government payroll and pay deserving staff genuine salaries. The policy is intended to ensure that teachers attend school to aid teaching and learning. Headteachers and assistant headteachers are the key implementers (frontline agents) of this policy who receive electronic messages from the Controller and Accountant General Department (CAGD) close to the end of each month for them to confirm teacher attendance for the payment of salaries. However, it has been observed that some absentee teachers are validated and this presents a formidable challenge to achieving the policy goals. This study explored the phenomenon of 'street-level priority setting' in the TVP by focusing on how the frontline agents implement strategic priorities for validation of teacher salaries and in the course of doing so, make discretionary decisions, typically at the implementation level.

The challenge of managing street-level discretion in the TVP implementation therefore lies at the heart of the search for strategies of administrative oversight and control in this paper. How can management encourage accountability in the TVP implementation without deadening responsiveness and undermining the application of professional judgment of the frontline agents on which management so depends? Thus, the paper interrogates the problem of accountability from a street-level perspective. First, it examines the limitations of the approaches to

accountability, including NPM solutions that rely on teacher registers. Second, it takes a position for street-level approach to accountability and shows how it can be used to reveal critical dimensions of organizational practice that need to be recognised in the policy implementation process. Finally, issues of street-level practice are placed in broader perspective, as part of an ongoing global search for ways to advance transparency and accountability in public sector governance.

Furthermore, the imperatives of controlling administrative discretion accountability are linked with the rubrics of the PAT which is the framework for analysis in this paper and explained thus: the theory is used to elucidate central problems in interaction between principals and agents in both policy implementation and policy making concerning performance and remuneration. In this theory, the first best solution or perfect equilibria for street level bureaucratic behaviour would be found in the implementation of policies under perfect and symmetric information. In this context, the government as principal has hired a set of bureaux to implement the TVP. These bureaux are paid albeit 'decent' remuneration, hired on long-term contracts with promise of predictable pension in order to make sure they develop expertise on the TVP matters. Given a sharp distinction between policy-making and policy implementation, the bureaux would focus their attention upon the means to achieve goals, maximising efficiency and effectiveness in TVP as well as neutrality in politics, along lines suggested by Weber's ideal model of the bureaucracy (Serpa & Ferreira, 2019). However, any introduction of asymmetric information changes all of these, and makes room for the search for rents or quasi rents by the frontline agents who engage in opportunism (see de Walle & Raaphorst, 2019). In this sense, the theory identifies two major difficulties when a principal contracts with a set of agents under asymmetric information, namely moral hazard (*hidden action*) and ad-verse selection (*hidden knowledge*). These two difficulties surface whether the contract is explicit as with policy implementation, or the contract is opaque and only enforceable to a limited extent.

Statement of the problem
It is observed that some teachers in the Ampabame West District of Ghana are fond of absenting themselves from school yet they take their full salaries at the end of the month in spite of government's deployment of frontline agents to check absenteeism under the TVP. This sets the context for the problem that underpinned the study which is: the teacher validation policy is fraught with challenges that emanates from street level interpretation of the policy in spite of government's efforts to stymie the practice of absenteeism, especially as the policy implementers have resorted to new ways to perpetuate the status quo – that is, getting some teachers validated without necessarily attending school.

Purpose of the study
The study sought to explore how frontline agents for the teacher validation policy in the three basic schools in the Ampabame West District perceive and interpret the policy, and how these interpretations have shaped the policy.

Objectives of the study
The objectives of the study were to:

1.	find out the dimensions of teacher absenteeism in the 3 basic schools in the Ampabame West District.
2.	investigate how the behaviours (perceptions and interpretations) of the frontline agents of the teacher validation policy have been used to re-shape the policy in the 3 basic schools in Ampabame West District.

Research questions

Two research questions were used to conduct the research. These are:
1.	what are the dimensions of teacher absenteeism in the 3 basic schools in Ampabame West District?
2.	how have the behaviours (perceptions and interpretations) of government frontline agents of the teacher validation policy been used to re-shape the policy in the 3 basic schools in Ampabame West District?

The functions of perceptions and interpretations of absentee behaviour

This discussion pertains to the theoretical framework of the study and it focuses on the scope of teacher absenteeism in schools, and the perceptions and interpretations of the policy implementers.

Dimensions of teacher absenteeism in schools

The paper assumes that teacher absenteeism takes different forms and dimensions such as when employees fail to report to work when they are scheduled. This act constitutes costs and a huge disruption for the employer and the clients. Cascio (2003) has classified absenteeism as "any failure of an employee to report or to remain at work as scheduled, regardless of the reason" He argues that teacher absenteeism is a pertinent educational policy issue, and Brown and Arnell (2012) have argued that absentee behaviour is prevalent in many educational organizations. Rhodes and Steers (1990) have long ago researched on absenteeism and have indicated that the concept involves a wide range of variables and classifications but Johns (2003) has pointed out that the construct is imbued with lots of definitional, methodological and statistical problems. However, Rhodes and Steers (1990) have identified three characteristics of absentee behaviour as: the pervasive nature of absenteeism across organizations and international boundaries; the high cost involved; the potentially serious consequences for the individual, co-workers and organizations alike. Muchinsky (1977) has also said long ago that the concept of absenteeism is difficult to measure.

Teacher absenteeism may be caused by a variety of factors. Miller (2008), Rosenblatt and Shirom (2005), and Porwoll (1980) believe that this is mostly caused by the level of teacher experience. Tao (2013), Kadzamira (2006), Sykes (2001) as well as Globerson and Ben-Yshai (2002) have attributed this to inadequate salaries and compensation. Other writers attribute teacher absenteeism to factors like levels of teacher education and professionalism (Abadzi, 2009) the school climate and tone or public-private school divide (Tooley, Dixon & Olaniya, 2005); the school governance system (Kremer et al., 2005); community influence (Tao, 2013; Kadzamira, 2006); socio-cultural expectations and traditions (Cadre, 1998); less motivation for female teachers (Tao, 2013; Farrell & Stamm, 1988; Steel & Rentsch, 1995; Globerson & Ben-Yshai, 2002);

teacher accommodation challenges (Sekyere, 2010); and human relations factors (Tooley, Dixon & Olaniya, 2005).

A plethora of literature has suggested that teacher absenteeism has negative effective on teaching and learning in schools (see Eyre, 2000). Miller (2008) believes that when a teacher is absent from the classroom, student learning is disrupted and when the teacher is repeatedly absent, student performance gets affected negatively. Gottfried and Hutt (2019) and Farrant (1982) also believes that teacher absenteeism affects other teachers' who would also begin to take time off from work. Adeyemi and Akpotu (2009) have established that teacher absenteeism has effect on students examinations because it reduces the teacher-student contact hours and results in the non-completion of syllabus. Indeed, Garman (2018) and Allen (1983) have concurred that teacher absences has negative effects on productivity because it becomes difficult to find a fitting replacement immediately which leads to discontinuity of sequential learning and damage to students' motivation to learn (Bruno, 2002; Turbeville, 1987). Varlas (2001) believes that teacher absenteeism leads to a radical reduction of instructional intensity and the disruption of school routines and procedures (see also Turbeville, 1987; Eyre, 2000).

Measures to check teacher absenteeism
The paper believes that certain behaviours of frontline agents may impede measures to check teacher absenteeism. Sekyere (2010) has indicated that organizations rely on its statutes to check absenteeism and structure employee attendance. These statutes encompass rules on sick leave; maternity leave; and study leave with pay. Duflo et al. (2012) found the under-listed measures to be useful in checking teacher absenteeism in their survey of 3000 Indian schools. These include sanction of being fired from work. Their research also found monitoring and incentives to be an effective measure. These are achieved by using pupils to take pictures of teachers at the beginning and end of school. The other is rewarding punctuality. The use of rewards as an effective stimulus for punctuality has long ago been emphasized by Ivancevich and Matteson (1990). Besides, the urgency of using rewards to check absenteeism is further reinforced by Armstrong (2012) and Luthans (2002). In these various ways, Zedekia (2017) however believes that frontline agents become the ultimate policy makers by shaping the policy through their perceptions and interpretations of the policy during implementation.

METHODS AND METHODOLOGY

The research used the qualitative research approach to conduct the study. It used multiple methods to collect data which enabled the research to obtain an in-depth data on the experiences of participants and determine how meanings could be formed through analysis. These methods include interviews, focus group discussion and documentary evidence. The data from the 3 methods were triangulated by cross-checking them within and between the methods to establish coherence and consistency (see Yin, 2011).

Site and subject characteristics
The research was conducted in the Ampabame West District of Ghana in 3 basic schools. These are: Kwaebibirim, Sikaland and Greens basic schools all of which have nursery 1 through

Kindergarten to junior high schools (in order to avoid recriminations as criteria for ethical consideration in the research, the actual names of the District and Schools used for the study are concealed. Hence, the names used here are mere pseudonyms). These schools respectively have 14 teachers and 1 head teacher with 180 pupils; 15 teachers, 2 headteachers, and 200 pupils; and 14 teachers, 1 headteacher, and 160 pupils.

Population, sample size and sampling techniques

The total population for the study was 49 and constituted as by 41 teachers, 4 headteachers, 1 circuit supervisor and 3 community members from the 3 schools; and a sample size of 31. This was made up of 24 teachers, 3 headteachers, 3 community members, 1 circuit supervisor. Purposive sampling technique was used to select the 3 headteachers, 3 teachers and 3 community leaders and I circuit supervisor for the interviews because these categories of respondents were either deployed by government and work as frontline agents for the TVP or have information on teacher-behaviours (see Kumekpor, 2002). Convenience sampling was also used to select 7 teachers from each of the 3 schools for the focus group discussion.

Strategies for ensuring trustworthiness

The research used interview guides and schedules as well as documentary checklist to collect data. Three strategies were used in conformity with Gobi's criteria to ensure trustworthiness of the findings (see Guba, 1981). These fall specifically in the domain of credibility and dependability criteria. These are:

a. Triangulation which involved using three data sources to reduce inherent biases associated with any one of the sources. This was used as a tool to ascertain the validity of the inferences derived from the multiple sources of data (see Hammersley & Atkinson, 1995).

b. Peer debriefing which enabled the researchers to discuss the research methodology, analysis and interpretations of the data on a constant bias throughout the research process with two peers who were not part of the research directly (see Lincoln & Guba, 1985).

c. Reflexivity to acknowledge and reduce researchers' bias. This criterion made it possible to discuss the researchers; position within the study and how their beliefs and training may influence the findings (see Long & Johnson, 2000).

Data collection procedure

Ten semi-structured interviews were conducted face to face with 3 headteachers, 3 teachers, 3 community leaders and the circuit supervisor. The interviews were audio recorded and supported with note taking. These lasted for an average of 45 minutes per an interview. Three focus group discussions were also used to collect further data. The groups were organized on school-by-school basis and each group was constituted by 7 teachers. These sessions were also recorded by audio and supported with note-taking. The focused group discussions lasted for up to 1 hour on average. Thirdly, the documentary data sources included: teachers' written request for permission to be absent from school; excuse duty forms obtained from qualified medical practitioners; and the e-spv (electronic salary payment voucher operations manual).

Data analysis procedure

The research used grounded theory as the framework for analysing the data. This involved using 4 levels of coding namely open, axial, selective coding, and finally development of theoretical concepts (see Bryman, 2012). Microsoft Word and Access were used for the stages of data analysis.

The PAT and bureaucratic behaviour in the TVP

This section discusses the findings from the data collected for the study, and it encompasses discussions on the dimensions of teacher absenteeism, and how the TVP is finally determined by the perceptions and interpretations of the frontline agents – what is known as street-level policy making. This paper takes a view with Lind et al. (2017) and Rose-Ackerman (1999) in her seminal contribution 'Corruption and government' that the PAT is a useful tool for analysing bureaucratic behaviour. The PAT connotes that the principal is an actor who represents a certain interest like the public interest. The agent is another actor who is supposed to carry out some task(s) for the principal. However, there are situations where the agent resorts to pursuit of self-interest instead of the interest for which the principal deployed them. This is known as the "agency" problem. According to PAT, the agency problem arises when there is some sort of "information asymmetry" between the principal and the agent (see Malmir et al., 2014). In other words, the principal does not know what the agent is doing. The solution to overcome this asymmetry is obviously monitoring. But principals cannot always monitor agents. Grossman and Hart (1983) illustrate this dilemma thus:

> Consider two individuals who operate in an uncertain environment and for whom risk sharing is desirable. Suppose that one of the individuals (known as the agent) is to take an action which the other individual (known as the principal) cannot observe. Assume that this action affects the total amount of consumption or money which is available to be divided between the two individuals. In general, the action which is optimal for the agent will depend on the extent of risk sharing between the principal and the agent. The question is: What is the optimal degree of risk sharing, given this dependence?

Contracts and their designs are central feature of this discourse which are used to solve the dilemmas of moral hazard, self interest, and simply poor understanding of common objectives. This paper claims here that PAT theory offers important solutions by presenting a challenge to public and for that matter educational administration. It puts an emphasis on negotiations for contracts which will then steer processes forward with costs reduced as a consequence. So then, the central problems associated with information asymmetries are tackled by setting up arrangements which may provide "credible commitments" (Groenendijk 1997; Geraldi 2007; Teorell 2007; Rothstein 2011) like the policy rule framework under policy implementation. PAT holds a central position in administrative studies as one of the dominant theories that helps to explain why some bureaucrats behave in certain ways that leads to poor performance and sometimes plagued by corruption (Rothstein 2011; Persson et al., 2013) or rent seeking. These make the theory relevant in this paper as the analytical framework.

Dimensions of teacher absenteeism in the 3 basic schools

The Table (1) below contains data about the dimensions of teacher absenteeism in the selected schools for the study and uses this as the basis to establish the relevance of the TVP. The data presented were obtained from interviews, focus group discussions and documentary evidence and are presented graphically thus:

Table 1: Overview of the relevance of the TVP implementation

Bureaucratic imperatives	Practices/behaviours
▪ Dimensions of absenteeism	• Telephone, verbal, written requests **(difficult to verify reason)** • Medical reports **(difficult to verify)** • Sudden sickness **(inability to verify)** • 3 days absence **(granted by the head)** • 3+ days absence **(granted by the education office)** • Absence on Mondays and Fridays **(extension of weekends)** • Most absences happen under permission **(Street level behaviour)**
▪ Effects of teacher absenteeism	• Disruption to school activities **(teaching & learning compromised)** • Pupils absenteeism and deviant behaviours **(loss of interest in school)** • Loss of respect for the absentee teacher **(teacher ineffectiveness)** • School indiscipline **(problems for the economy)**
▪ Management of absenteeism	• Report cases to authorities **(tensions and conflict)** • Permission given irrespective of reason **(street level behaviour)** • Strict rules on permission **(small numbers of staff)** • Absentee teacher cover **(tensions / street level behaviour)** • Discourage teacher absenteeism **(nemesis)** • Punctuality of head for absenteeism **(leadership by example)** • Sanctions for absenteeism **(street level bureaucracy)**

Source: Fieldwork data (2019).

Key: Implications for the data are the parenthesis put in bold and in brackets.

a. Permission to be absent from school

The interview data (as presented in Table 1) indicated that teachers absent themselves from school but this mostly happens when teachers seek permission, although some others do not. The data

showed that teachers ask permission either "by telephone, verbal request through colleagues, or written request emergencies" (Interview data, Respondent #4). Another respondents explained that "teachers use verbal requests when they do not intend to take a long absence through verbal request for permission but use written request if they have to be absent for two or three days" (Interview data, Respondent #8). These claims are supported by a focus group data which indicated that "teachers absent themselves from work through written request but mostly use verbal request in emergencies" (FGD data, Respondent #4). This view is corroborated by the documentary evidence (a written request) which stated that "I ask that permission be granted me to absent myself from school for a period of three (3) days. This will enable me to fully apply a local medicine to cure a painful lump on my skin (boil) that is making it unpleasant for me to put on trousers and shirt to school" (Documentary evidence #1). This was supported by an exemption from work form from a medical practitioner that declared the teacher unfit to attend work on the following grounds: "Diagnosis - RTA; Number of days - 2; Date - 23/01/14" (Documentary evidence #2).

Aslem and Deograties (2012) have made the case that it is important to track teacher absenteeism for better education outcomes. They have argued that in order to achieve this, transparency and accountability mechanisms have to be strengthened. In line with this view, the data has indicated that absenteeism is not tolerated in the schools. This is expressed in the contradictions in the interview and focus group discussion data regarding the fondness of teacher absenteeism. A respondent disputed the fact that teachers in the school are fond of asking permission to be absent from school because the teachers already know the rules from the Ghana Education Service (GES). Another respondent contradicted this view and indicated that "teachers are fond of asking permission in this school" (Interview data, Respondent #1). This view is corroborated by the focus group discussion data that "we have teachers like that in this school, but you are not in the teacher's body so you can't dispute their claim" (FGD data, Respondent #1). The interview data revealed that teachers are informed about the number of officially permitted days they are allowed to be absent from school in any term in order to control absenteeism. This is done by alerting the teacher if permissions are sought frequently. A respondent expressed an opinion that "… the head teacher is supposed to give only 3 days permission. So any additional days should be communicated through the education office" (Interview data, Respondent #4). This is supported by the view that:

> A particular teacher is fond of doing that so I asked him to write formally for permission and this stopped him from absenting himself from school. Teachers have a 3-day limit to be absent from school. After this, they need to write to the district office for additional days. It is unfortunate that anytime I try to enforce the rule, some teachers create a bad impression that I am autocratic (Interview data, Respondent #5).

b.   Effects of teacher absenteeism in the schools
Teacher absenteeism has a number of implications for teaching and learning in the three selected schools. These include causing major disruptions in school activities such as the non-completion of the teaching syllabus; poor academic performance at the Basic Education Certificate Examinations (BECE); absentee teachers' loss of respect from both colleagues and pupils;

decreased pupils' work output; school indiscipline; and pupils' loss of interest in school. A respondent indicated that teacher absenteeism:

> will affect the performance of pupils at the BECE because teachers will not be able to complete the syllabus. The teacher will lose respect with colleague teachers and will affect pupils' attendance to school … and lead to loss of trust in the teacher by the headteacher. If a teacher absent himself from school, it slows down teaching and learning in the school (Interview data, Respondent #2).

These perspectives are elaborated further as the interview data revealed that teacher absenteeism leads to pupil's absenteeism and deviant behaviours. Thus, teacher absenteeism has a number of effects on pupils. Some will simply decide to play around the school compound; others will also absent themselves from school, while others will dislike the subject of the absentee teacher and in turn perform poorly during examination. Eventually, this practice will lead to the loss of pupils' interests in attending school. This is reiterated by a respondent that "the children are very smart and observant and would as well absent themselves from school when they notice that their teachers are not coming to school" (Interview data, Respondent #2). The focus groups data also indicated that "pupils will play in class, and mess around the school compound…" (FGD data, Respondent #10).

Management of absenteeism

The data shows that the management of teacher absenteeism in the district takes many forms. As shown in Table 1, the interview data has revealed that teachers who abhor absenteeism would go beyond the head teacher to the education office to report such cases. A respondent said that "… some heads report cases of absenteeism to the office straight away because the teachers concerned are very stubborn" (Interview data, Respondent #4).   The data further indicates that teachers usually miss school on Mondays and Fridays. This trend of teacher absenteeism is abhorred by the community because they perceive teachers as using this strategy to have their weekends extended. The focus groups data on the contrary believe that this may be a hasty explanation of the 'Fridays-Mondays' absenteeism. The data argues that it is wrong to "…judge quickly why a teacher is absent from school on Mondays and Fridays. … it is important to interact with the teacher to really know what is going on and not jump into conclusions" (FGD data, Respondent #1).

The interview data shows different perspectives on teacher absenteeism which ranges from teachers not coming to work for more than a day through to teachers coming to work but not working. Another view from the interview data shows that some teachers report to school and leave in the morning and these create loss of teacher-pupil contact. The interview data revealed that most of the teacher absences happen under permission. This is done to avoid punishment that otherwise may emanate from non-permitted absence.

The interview data shows further that teacher absenteeism is almost impossible in schools with fewer number of teachers because the few teachers are already occupied with huge responsibilities and are unable to take on extra duties. This view is expressed thus by respondents: "I don't encounter so much absenteeism because of the small number of teachers" (Interview data,

Respondent #7), and "the staff strength is not much so all teachers attend school regularly" (Interview data, Respondent #8). In situations such as this, teacher absenteeism creates tension among teachers due to the extra work created, and it also makes it easy for other teachers to copy the absentee behaviour. The interview data indicated that "I would not be happy as an individual that a colleague is always absent from school…" (Interview data, Respondent #2), and that "teacher absenteeism gives burden to the other staff since they have to take up the responsibility of that teacher who is absent from school. This affects their input because they will be doing double work. This practice creates tension between the absentee teacher and his/her colleagues" (Interview data, Respondent #4). Another respondent said "… they are bound to copy the absentee behaviour of their colleague" (Interview data, respondent #1). DiMaggio and Powell's (1983) idea of mimetic isomorphism may best illustrate this view. The argument on this stance is that uncertainty creates a powerful force that encourages imitation especially when the organizational environment creates symbolic uncertainties as those created by persistent teacher absenteeism. Consequently, this paper takes a view that under such uncertainty, some bureaucrats may model their behaviours on other bureaucrats' behaviours (absenteeism). Beckert (2010) calls this cultural isomorphism which emanates from mimetic isomorphism.

However, the schools have learnt to deal with this situation by encouraging teachers to individually focus on their objectives. A respondent said that "If you do not know what you are doing as a teacher that is when you will allow somebody's attitude to influence you, … others may be influenced but not me" (Interview data, Respondent #2). Then also the headteachers discourage the behaviour in order to prevent other teachers from being influenced. A respondent explained that " … I usually discourage that behaviour during staff meeting so others will not copy" (Interview data, Respondent #4).

The interview data further showed that headteachers set the example of being present in school. This practice enables them to use formal and punitive procedures to stop absenteeism. This is suggestive that teacher absenteeism is on the decline in the district. A respondent for example said "I don't entertain absenteeism at all because I'm always in school…" (Interview data Respondent #7), then also "management will discipline the teacher, through query, reporting to the office for the necessary action to be taken against the teacher" (Interview data, Respondent #1) implying that the schools use definite and formalized procedures to deal with absenteeism. The schools compliment these efforts in worse case scenarios when a teacher becomes impertinent by involving the Parent-Teacher Associations (PTA) where the teacher would be called to explain the habitual absence. A respondent claim that the schools would only make a report to the Ghana Education Service for punishment when all these efforts fail to halt the absentee behaviour, "… the PTA would request the headteacher to call absentee teachers into a meeting to be talked to. If they continue to be absent, the school would go ahead and make a report to the education office" (Interview data, Respondent #6).

The data presented above bring into focus the PAT. As noted earlier, the principal-agent relationship entails a contract under which one or more persons (the principal(s)) engage another person (the agent) to perform some service on their behalf that involves delegating levels of

decision making authority to the agent. The previous discussion of the theory is extended here to show three major assumptions:

1. both the principals and agents are rational actors who seek to maximize gain from the contractual relationship between them. The ability of the principal to maximize from the contract is however limited by two problematic issues namely, supervisors cannot know their subordinates true preferences and abilities (called adverse selection) nor can they observe all subordinates actions (called moral hazard).
2. the relationship between the principal and the agent is characterized by goal conflicts. This emanates from the idea that the agent is trusted to make decisions that are in the best interest of the principal. However, the agent's preferences derive from self-interest and self-preservation and do not actually concern themselves with the interest of the principal. According to Brehm and Gates (1997) the goal might arise from differences in their preference, and indeed conflict of interest is one of the main problems ailing the TVP implementation process.
3. agents are typically endowed with more information than their principals, and hence information asymmetry. This result from the fact that agents have specialized training and are directly involved in the bureaucratic processes of the TVP. Knowledge disadvantage among the principals limits their ability to design contracts that guarantee their profitability. In other words, the agents can hide some information about work such that they are paid or obtain other benefits more than what their efforts are really worth as illustrated by the data on behaviours of frontline agents of the TVP.

While PAT provides valuable insights on the TVP implementation process, it is limited by the fact that it lays the responsibility of policy implementation on the principals who must carefully select the right employees, design favourable contracts and monitor the implementation process to guarantee implementation success. The agents' behaviour is thus assumed to be dependent on their contractual relationship with the principal. However, the data has shown that a number of factors influence bureaucrats' job performance including personal welfare imperatives, peer pressure and working conditions. In this instance, the theory does not fully explain the TVP implementation phenomena and therefore it is important to support it with the street level bureaucracy (SLB) theory which will explain why the frontline agents (street level bureaucrats) have become the ultimate policy makers (see Kerwin & Furlong, 2018).

Street-level bureaucracy is the concept developed by Lipsky (1980) to refer to a quality of administration of public services where workers, who are close to the client in the policy implementation process, exercise a substantial amount of discretion in allocating effort, dispensing of benefits, interpreting rules and regulations, etc. Local discretion exercised in this way can be seen as adding and subtracting from policy to the point where actual, de facto, policies, can be viewed as locally made, on the 'street-level'. Lipsky (1980) has suggested that under such circumstances, policies are enacted by the routines that agency officers establish, and the methods they develop to handle uncertainties and conflicting demands. Thus, Since there is a limit to how much a policy can be adapted to specific circumstances, bureaucrats need to develop routines to fit policy goals to a greater number of instances, and also make adaptations to fit general policy to

local needs (Pires, 2011; Lipsky, 1980). These local adaptations reflect workers' assessments of political and organizational realities, constraints and what their own desire, ability and ingenuity will allow. Naturally, bureaucrats expect their organizational context and requirements to conform to, and be consistent with their own values and preferences (Lipsky, 1980). Lipsky identifies a number of strategies that frontline agents use to control difficult and ambiguous work situations. Hudson (1989) has long ago argued that these strategies are used because organizations often do not have adequate resources to steer activities in consonance with policy goals, and hence the freedom to use substantial discretion (see also Hupe, 2019).

Shaping the teacher validation policy through street level behaviours
The paper also explores how the TVP is shaped by the street level interpretations of the policy in the 3 schools by the frontline agents. The dimensions of the TVP and their associated street level behaviours are presented in Table 2 (below) as captured by the data.

The interview data as presented in Table 2 shows that the teacher validation policy is a measure for teacher salary assessment based on attendance and performance of duties. The policy therefore has the function of checking absenteeism particularly checking the number of days teachers are present in school, and whether the named teachers are indeed working in the school. The policy is therefore designed to ensure that teachers are paid their salaries on the basis of attendance, work output, and check financial misappropriation in the educational system in order eventually reduce the wage bill of government. The interview data again revealed that the school authorities used the teacher validation policy to validate teachers to reduce the menace of absenteeism. A respondent said that "the teacher validation policy ensures that the teacher is paid according to the number of days he or she attended school" (Interview data, Respondent #7). This respondent has indicated earlier that there was no teacher absenteeism in the school. The contradiction in the responses questions the effectiveness of the policy in the school. The focus group data supported the interview data that extra classes were as a matter of consequence organized in schools to catch up with loss time from teacher absenteeism, sports and culture. A respondent indicated however that "sometimes, they organize evening classes to catch up with the lost time due to sports or culture and not because of absenteeism" (FGD data, Respondent #20).

Table 2: Dimensions of the TVP and the associated street level behaviours

Dimensions of the TVP	Street level behaviours (use of discretion)
▪ Teacher salary assessment	• Salaries paid on attendance and performance of duties **(statutes)**
	• Reduce government wage bill **(statutes)**
	• Reduce menace of absenteeism **(agent discretion)**
	• Attendance information forwarded to CAGD **(agent discretion)**
▪ Checks for teacher absenteeism	• Organise extra classes to make up loss of time **(discretion)**
	• Good behaviour and performance of duties **(teachers' code of ethics)**
	• Records teacher attendance **(discretion)**
	• Use of validation query forms **(statutes/discretion)**
▪ Teacher at post & working	• Absentee teachers receive salaries **(discretion)**
	• Class attendance form usage **(discretion)**
▪ Sanitize government payroll system	• Removal of ghost (fake) names **(agent discretion)**
	• Validation of ghost (fake) names **(discretion)**
▪ Challenges of validation	• Inclusion of names from other schools **(discretion/code anomaly)**
	• Validation codes provision **(information asymmetry)**
	• Non-use of attendance register **(discretion)**
	• No deduction from absentee teacher salary **(discretion/pecuniary & non-pecuniary motivations)**

Source: Fieldwork data (2019).
Key: Implications for the data are the parenthesis put in bold and in brackets.

A respondent confirmed that the teacher validation policy "is a programme designed to check teacher absenteeism. It makes it possible for teachers to be paid based on attendance, output of work, performing their duties as expected, and be of good behaviour in the school as pertained in the teachers' code of ethics" (Interview data, Respondent #4). This view is corroborated by the focus group data that the policy is intended to "… check 'ghost (fake) names' in the public service in other to reduce wage bill of the government. To check whether that teacher is actually in the school" (FGD data, Respondent #10). According to the interview data, this is achieved by an implementer who records teacher attendance in a particular month and then notifies the Controller and Accountant General Department (CAGD) when there is an issue (for example, absence from work) with a particular teacher during the validation process. A respondent commented that "there is a portion of the validation form that enables the official to raise a query on for example lesson notes, a teacher's relationship with the community, or number of days of absence. The officer then forwards the query to the CAGD to effect the deduction in salary" (Interview data, Respondent #1). Another respondent said "the headteacher validates and forward it to the circuit supervisor at the education office and she also forwards it to CAGD" (Interview data, Respondent #4). These

views converge with the focus group discussion data which indicates that the policy confirms "…teachers who are indeed at post and working. There are teachers who are supposed to be working in some schools but have actually left years ago but were receiving salaries. … so the teacher validation policy has helped to root out such teachers" (FGD, Respondent #18). The interview data has revealed that, the class attendance sheet has been a useful tool to the teacher validation policy in verifying teacher attendance especially if the heads follow up on the process. A respondent claimed that: "it will be useful if the head teacher is involved by going to check on the class prefect how they are managing it" (Interview data, Respondent #1). However this may be difficult to maintain at the primary level as argued by a respondent that "it will be good in the junior high schools not in the primary schools because the primary pupils may be too young to handle the class attendance" (Interview data, Respondent #2). Furthermore, "the class attendance sheet has good and bad side. It can be bad so long as teachers are able to negotiate with the class prefects to teach at their convenience, … it can be a distraction for the prefect from concentrating in class" (FGD data, Respondent #1).

One key challenge to the attendance register is that teachers are able to compromise the process due to their influence on the class prefects. A respondent argues that "I have been a class prefect before where teachers will secretly call you and negotiate and sign that they will meet the class in the evening and would never show up" (FGD data, Respondent #18). Another respondent reinforced this view with:

> the class attendance sheet may be useful at the JHS but not in the primary, because in the primary there is no subject teaching…. I believe that if it is used at the JHS it will rather promote absenteeism because if a teacher has a class in the afternoon, she or he can decide to stay at home and come, teach, sign and go back. The day he or she does not have a class he will stay at home. However in the JHS, teachers have the duty to monitor other processes in the school, and not only teaching and learning (Interview data Respondent #8).

These challenges will call for the active participation of the headmaster. Thus, the interview data shows that during the validation process in the selected basic schools, information on teachers are forwarded to the CAGD, and the Ghana Education Service (GES) uses this information to check and monitor teacher attendance. This suggests that the policy provides the platform for payroll maintenance by the GES. It enables government to track 'ghost' names on the payroll and to verify teachers work output.

Effectiveness of the validation policy in the 3 basic schools
The paper has established the argument that when governments set out to deliver public services, they have to rely on sets of bureaucrats who have been described by the classic model of public administration as a set of bureaus with specialised functions, accumulating expertise over time. However as discussed previously, in the long-term contracting agents have incentives to demand rents due to asymmetric information. These rents may lead to a number of inefficiencies that emanates from hidden actions among the agents which are normally violations of the policy rule framework. This notwithstanding, public sector reform over the last couple of decades of which the TVP is a part has provided frontline agents with another type of opportunistic strategies through

adverse selection to capture as explicated by the implementation of the TVP. The interview data shows that the implementation of the policy in the three schools has not been effective although to an extent the policy has been able to remove 'ghost names' and sanitize the government payroll system. A respondent however explained that

> The policy … has been effective so far because it has dealt with the issue of ghost names on the payroll. I know the names and number of teachers on my staff list, so if I see any name unknown to me, I raise an alarm, then the CAGD takes it up to verify and expunge the name from the payroll" (Interview data, respondent #1).

This position is extended to cover absenteeism from work thus: "yes, it is effective so far because I don't have teachers with absentee behaviour in the school. So at the end of the month, I don't face problems in validating teachers…" (Interview data, Respondent #7). This view is contradicted by a set of data that indicates that the TVP has not been effective because head teachers are still validating absentee teachers and do not use the attendance of teachers in the process. It argues that even 'ghost' names are validated and the heads share the illegally paid salaries with the personnel involved. This suggests that in spite of the policy, 'ghost' names persist on government pay roll. The data argues that "the policy is not effective … so far because the goal of the policy has not been achieved in this school. Teachers are paid their full salaries even when they absent themselves from school in the month" (Interview data, Respondent #5). This is supported by another view that "… no, the policy implementation has not been effective. The policy is not serving its purpose as there are still 'ghost names' on government payroll. Besides, headteachers do not effect the deductions from absentee teachers' salaries" (FGD data, Respondent #14). This contradiction has been explained by Odei-Tettey (2001) that "policy outcomes are not easily determined during the implementation stage because this is an ongoing process between implementing agencies and the policy environment, each with differing interest". This is why policy implementation process normally lead to outcomes quite different from those intended and anticipated by policy makers.

The data has therefore shown that headteachers face challenges that make it difficult for them to ensure the deductions from absentee teacher salaries. Some of these challenges are the inclusion of names of teachers from other schools on a different school's payroll because some schools do not have the validation codes to validate their staff salaries; and the delay in migrating teachers who have been transferred to their present school's payroll. Two respondents stated: "yes, I always query issues 'unknown to me' then forward it to the education office. The District Education Office also indicate unknown in school 'A' but known in school 'C' " (Interview data, Respondent #1); and

> "some schools do not have validation codes. Furthermore, because of transfer of teachers from one school to the other, the system allows for a period of three month to transfer teacher's salary to his/her new school. After that grace period, the teacher is being treated as a 'ghost' even if he/she is not" (Interview data, Respondent #2).

The interview data further revealed that the front line agents do not make the deduction from absentee teacher's salary because the attendance register is not used during the validation process. A respondent confirmed that "no, I do not make the deductions from absentee teachers salary because I do not use the attendance register to validate teachers" (Interview data, Respondent #5). The data has shown that the teacher validation policy is not being implemented per the guidelines due to the associated implementation challenges.

The interview data has revealed that the TVP creates enthusiasm for work among teachers. This implies that teachers recognize and accept the policy as government measure to regulate bureaucratic behaviours in the educational sector. This is expressed by a respondent as: "the validation policy has put some enthusiasm in teachers to come to school because they will not like even a penny to be taken out of their salaries. So the awareness that absenteeism will affect their salaries, make them to sit up and come to school regularly" (Interview data, Respondent #4). The focus group data concurs that the sanctions that associates the teacher validation policy has scared teachers from being absent from school. This notion is expressed by the data as: "we cannot complain. It was from the authorities, so whether we like it or not we would be validated before our salaries are paid" (FGD data, Respondent #12). This raises an important subject in policy implementation regarding participation of the end users of policy during the policy making process. Lane (1987) have long ago argued that policy implementation processes are built around asymmetric relationships between the formulators of policy and the implementers because implementation theory suggests that public policy becomes a legitimate concern for implementers once it has been decided on. In the context of the teacher validation policy, teachers who are the implementers were not involved in the policy formulation process but rather are being coerced into accepting the implementation of the policy. Hence the GNAT has always contested the policy and requested government for a review of the policy (Dery, 2016).

The TVP implementation: From moral hazard to adverse selection
This paper takes a view that good policy ideas more often founder on the rocky shoals of administration but the PAT and by extension discretion and accountability models may be used to prevent administrative shipwrecks. The paper has shown previously that the PAT identifies two major difficulties when a principal contracts with a set of agents under asymmetric information, namely moral hazard (*hidden action*) like heads validating absentee teachers in contravention with the statutes, and adverse selection (*hidden knowledge*) as in coming to terms with teachers remuneration and living standards. These two difficulties surface when the contract is explicit or when the contract is opaque and only enforceable to a limited extent.

They also surface under asymmetric information which makes it possible for the frontline agents to embark on various opportunistic strategies that increase their remuneration - pecuniary or non-pecuniary ones. It is envisaged however that the move of government to the TVP as a strand of the NPM will stop moral hazard in the education sector. Rather, it invites adverse selection – the system that relies on frontline agents who are not trustworthy or reliable. The situation even becomes more complex by the difficulty in monitoring huge bureaux for government. The data has shown that sometimes the rent-seeking ambitions of the frontline agents lead them to engage

in illegal activities such as disregarding the register for validation, refusal to deduct money from absentee teachers' salaries, as well as paying salaries to non-exiting bureaux. These actions are taken in order to obtain economic rent which is an unearned income, meaning an excessive remuneration compared with what had to be paid. But they are made possible as a result of the use of discretion in the bureaucracy (Lind & Rabe-Hemp, 2017).

Hupe (2016) and Evans (2010) have noted that for employees, discretion can be seen as the extent of freedom he or she can exercise in a specific context. Related to this, Davis (1969) has stated that "a public officer has discretion whenever the effective limits on his power leave him free to make a choice among possible courses of action or inaction" (see also Vinzant et al., 1998). Lipsky (2010) focuses more specifically on discretion of street-level bureaucrats. He considers discretion as the freedom that street-level bureaucrats have in determining the sort, quantity and quality of sanctions and rewards during policy implementation (see also Hupe & Hill, 2009; Tummers, 2012). This paper therefore defines discretion as the perceived freedom of street-level bureaucrats in making decisions concerning the sort, quantity, and quality of sanctions and rewards on offer when implementing a policy. For example, the extent an experienced headteacher has the freedom to decide whether or not to validate an absentee teacher's salary.

The discussion made so far has an affinity with Lewin's (1936) notion that people behave on the basis of their perceptions of reality, not on the basis of reality itself. Besides, street-level bureaucrats may experience different levels of discretion within the same policy context because:
i.   they possess more knowledge on loopholes in the rules,
ii.   their organization operationalized the policy somewhat differently,
iii. they have a better relationship with their manager which enables them to adjust themselves to circumstances, and
iv.   the personality of the street-level bureaucrat is more rule-following or rebellious (Brehm & Hamilton, 1996; Prottas, 1979).

Discretion is primarily seen as a tool that street-level bureaucrats use to pursue their own, private goals. This influences the policy being implemented in a negative way, which undermines the effectiveness and legitimacy of the policy (Brehm & Gates, 1997). The data has given examples of good ideas gone astray and point finger at the bureaucracy as the graveyard of good intentions. However, the key rhetorical question is that: is the bureaucracy the cause of death of the good intentions for the TVP or simply the location of the death of the good intentions? This idea is succinctly discussed by Pressman and Wildavsky's (1984; 1973) seminal work on policy implementation which is subtitled 'How great expectations in Washington are dashed in Oakland; or, why it's amazing that federal programs work at all, this being a saga of the Economic Development Administration as told by two sympathetic observers who seek to build morals on a foundation of ruined hopes. So between "great expectations" and "ruined hopes" lay the uncharted terrain of implementation, which is the so-called "black box" into which policy ideas disappear only to re-emerge in unrecognizable form in case they do at all as told by the data. In order to deal with this issue, accountability mechanisms are often put in place in order to achieve compliance. The data has stressed on how the TVP frontline agents develop and undertake discretionary actions in implementing the policy. Some of these frontline agents engage in actions that are not prescribed

by policy rule framework such that the practical concerns and opportunities they identify are rarely included in the strategic priorities of the principal - that is checking teacher absenteeism and controlling government payroll. Rather, frontline agents' address such concerns to suit their self-interest. For example, implementing agents are able to ignore the use of validation codes as well as teacher attendance register and are still able to validate salaries.

This has been possible due to the degree of discretionary control they have over how their organizations carry out the implementation activities (see Koven, 2019). This resonates with the notion of street-level bureaucracy (SLB) which means that policy making stretches into the lower levels of public organizations, via a range of discretionary activities of civil servants at the implementation level (Lipsky, 1980). This is triggered by the absence of clear instructions for how to convert strategic priorities into content and process, or the deficiency of top-down communication about strategic priorities (Piore, 2011; Silbey et al., 2009). In addition, the considerable degree of freedom acts contrary to the imperatives of the policy as defined by the law and enabled by the relatively high level of rents (Lind, & Rabe-Hemp, 2017). This allows them to engage in modification of the rules by creating new social conditions for the validation exercise. Thus bureaucratic behaviour has facilitated a discretionary steering of the TVP which may be considered as the epistemic aspect of SLB where policy criteria are developed, policy niches are identified and new ways of achieving policy goals are developed.

The paper argues that it is difficult to understand why bureaucrats ought to be entrusted with discretion if a discretionary space is only a license to do what they want. However, it is comprehensible if holders of discretionary powers incur an obligation to justify their defeasible judgments by public reasons. This implies a demand for accountability as explicated by the data. So in the context of this paper, agents with discretionary powers are accountable to the principal who has entrusted them with this power regarding the determination of how to perform their responsibilities (see Molander et al., 2012). In common usage, 'accountability' is associated with the process of being called 'to account' for what one does or has done. The closest synonym is 'answerability,' which indicates that being accountable to somebody implies the obligation to respond to nasty questions, and vice versa, that holding somebody accountable implies the opportunity to ask uncomfortable questions. To be accountable in this sense does not only mean that one may be asked to provide information about his/her judgment, decisions and actions but also to justify them. Accountability demands reactions to misconduct as without accountability, there will be no control of what is going on in discretionary spaces. Its aim is to assure that agents take their responsibilities seriously and act in a way that is publicly justifiable (Li, 2017). This paper looks at two ways of making the use of professional discretion more accountable. These are structural measures targeting discretionary spaces, and epistemic measures targeting discretionary reasoning.

Source: Authors (2019).
Figure 1: A two way measure for making professional discretion accountable
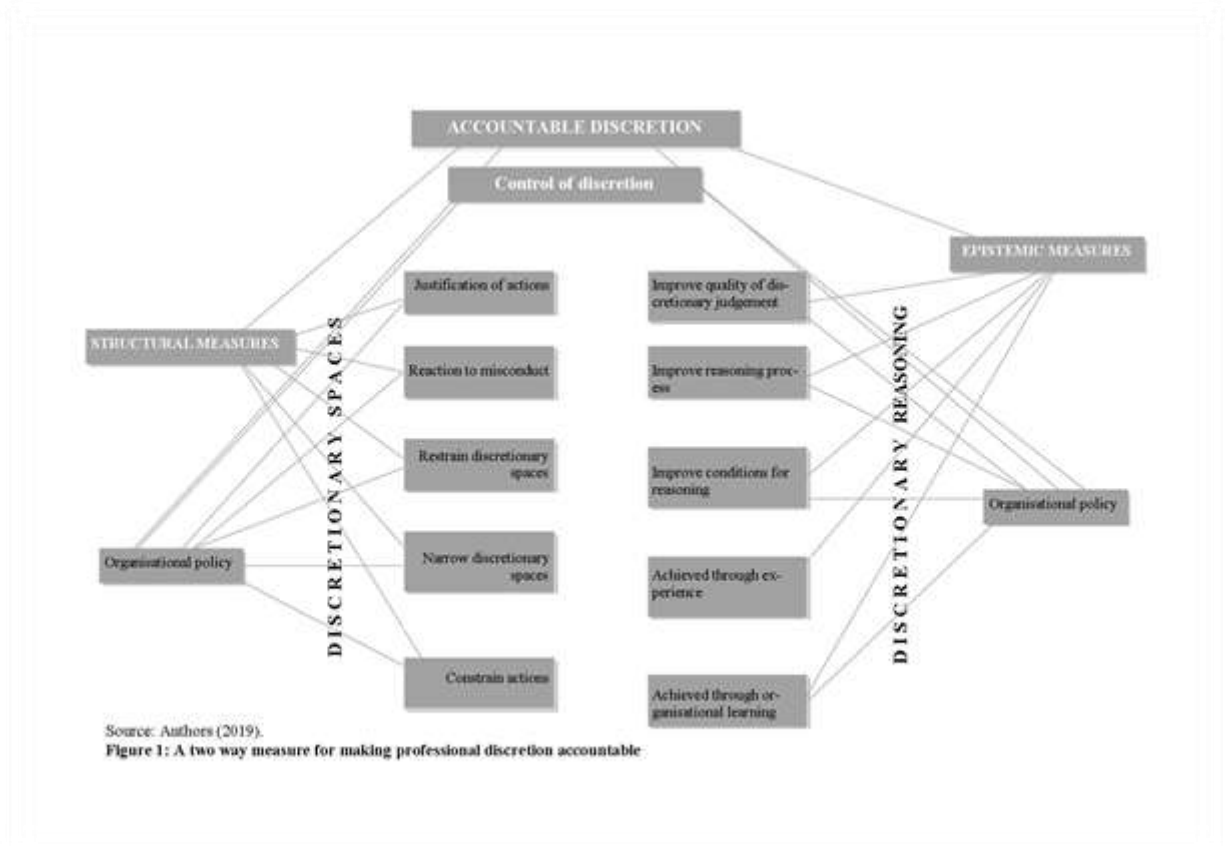
The main aim of structural measures is to restrain or narrow such discretionary spaces or to constrain the actions of persons who operate in discretionary spaces, while the main aim of epistemic measures is to improve the quality of discretionary judgments by improving the reasoning process or the conditions for reasoning. The distinction is rough as structural measures are mainly a matter of control but may have epistemic effects. Epistemic measures are internally skewed towards reason giving, which may call for corresponding structural measures, all of which will lead to narrowing of the discretionary space for responsible and accountable judgement of decisions.

The import is that accountability is an essential requirement of public management even though sometimes bureaucratic discretion becomes the nemesis of accountability. But the challenge of managing street-level discretion lies at the heart of the continuing search for strategies of administrative oversight and control that can promote accountability without deadening responsiveness and undermining the application of professional judgment on which management also depends. In the case of the TVP where discretion is a necessary and even desirable part of the policy implementation, public management faces an especially difficult task. How can managers know what takes place in the day-to-day activities of street-level bureaucrats, what occurs at the interstices of formal rules and informal practices, and what this means for sanitizing government payroll. So the discussion tackles the problem of accountability from a street-level

perspective. From this vantage point, the paper posits a theory that common accountability measures are too crude to capture the complex realities of informal practices.

NPM strategies used for improving accountability have rendered the command and control management insufficient to achieve accountability in street-level policy implementation and may even misdirect organisational behaviours. A street level perspective, as an applied theory for data analysis offers a reverse view of accountability. That is, it approaches accountability in the educational sector organizations, not from the outside in, but from the inside out. Thus, rather than specifying rules and process regulation, performance measurement and 'pay for performance' incentives in contracting arrangements takes an indirect approach. To oversimplify, they specify 'what' organizations are to produce without detailing 'how' they are to do it. In this sense, NPM appreciates discretion as a necessary part of policy delivery. It assumes that policy goals and incentives can be carefully aligned so that benign uses of discretion will be encouraged and malign uses discouraged. This is a distinctive form of accountability measures that directs attention to how policies are made at the front lines. This is most valuable when policy delivery involves lower-level discretion and complex decision-making features that are quite common to that part of the bureaucracy that are responsible for implementing public policies such as the TVP.

CONCLUSIONS AND POLICY IMPLICATIONS

This study builds on previous research on street-level bureaucracy, and extends it to the behaviours frontline agents in the implementation of the TVP in the attempt to regulate government payroll. It has demonstrated that frontline agents of the policy exercise a range of discretionary activities that significantly influence and re-shape the goals of the TVP. Thus, contracting and placing the frontline agents at the centre of such an implementation process gives them opportunity to directly affect the direction and content of the policy through the use of discretion. Some broader implications of this for accountability measures in policy implementation can be identified. One uncontroversial claim for discretionary spaces for bureaux is that it ought to be well-constrained by encouraging benign uses and discouraging malign uses. This notwithstanding, the study takes a view that street-level behaviours through the use of discretionary decisions play a significant role for the outcomes of policies which also creates a possible tension between the principal and the agent. It is therefore important to actively establish limits to the use of discretion.

The paper has also shown that political commitments are seldom enough to settle issues of adverse selection. For the frontline agents such high level commitments are often simply a context for street-level priority-setting. In this ambiguous context it is important to make sure that frontline agents' discretion does not fall prey to stakeholder expectations. This is the heart beat of Lipsky's (1980) seminal work on 'Street-Level Bureaucracy', which provided the theoretical template for a research approach that embraced the ambiguities and inconsistencies of legislated policies and creates an environment in which bureaucratic discretion could flourish. The application of Lipsky's model to the current study virtually reverses the normative premises of policy hierarchy and shows that in the TVP context, it is analytically useful to regard those bureaucrats at the "bottom" of the ladder (that is, the headteachers and Circuit Supervisors) as policymakers. Lipsky's (1980) substantive policy proposition reflects the data for this study thus:

    i.   lower-level bureaucrats effectively "make" policy when formal statutes are ambiguous or internally contradictory
   ii.   policy implementation requires discretionary decision-making at the point of delivery, and
  iii.   the routine activities of front-line workers can be neither fully monitored nor controlled.

Piore (2011) has extended the debate and suggested that instead of the traditional way of seeing discretion emerging in conflict with policies and rules which is a negative view, policy ambiguity can also be viewed as a source of creativity and motivation. He proposes that the absence of directives as well as the proliferation of rules and goals can open up the possibility of discretion as a 'creative necessity' leading to adaption and flexibility among street level bureaucrats (also Silbey et al., 2009). The study has shown that street-level analysis can be used to examine whether performance based contracts, in practice, are paying for performance or, instead, "paying for pretence." It further emphasise that overall, a street-level approach to accountability has the potential to illuminate dimensions of policy delivery that other analytic strategies do not capture, and by examining how policy is delivered at the frontlines of the bureaucracy, the data has brought into view those discretionary practices that systematically shape the policy experience. This is important to accountability as it extends management's capacity to assess dimensions of behaviours that bear on the content and quality of controls for teacher absenteeism and government payroll system.

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