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Building street-level capacity. Evidence from a policy for problem gambling prevention

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Abstract

This article studies the implementation of a policy for the prevention of problem gambling in the metropolitan area of Turin (Italy). The research adopts the theoretical lens offered by the street-level bureaucracy framework to understand how social workers develop individual policy capacities in the implementation of highly discretional tasks. So far, the relation between discretion and policy capacity has been scarcely investigated in the academic field. To fill this gap, this paper presents the results of a case study on local policy implementation to understand how street-level bureaucrats use their margin of discretion to redesign the policy and how this process leads to the development of policy capacities. The methods combine a longitudinal ethnographic study on three gambling venues (participant observation) and a series of semi-structured interviews with key actors. The evidence shows that street-level bureaucrats undertook a process of redesigning the policy, together with the development of a pragmatic and qualitative kind of individual analytical capacities acquired during daily practice. Focusing on such processes of redesign and capacity development, the paper offers novel insights for the theorization of more nuanced understandings of individual policy capacities.

KEYWORDS

capacity building, gambling policy, policy capacity, policy-oriented learning, street-level bureaucracy

INTRODUCTION

The street-level bureaucracy (SLB) framework is one of the most established theoretical perspectives on policy implementation. Lipsky's (1980) work on SLB questioned the traditional top-down approach adopted by other classic authors (Bardach, 1977; Pressman & Wildavsky, 1973), pushing toward the development of bottom-up research frameworks on policy implementation (see Hill & Hupe, 2021).

The original conception of street-level bureaucracy proposed by Lipsky identifies discretion as closely related to routines and coping strategies. These, in turn, change the de facto structure of the policy, also influencing its original goals and expected outcomes.

Over time, the success of the SLB framework has generated a large body of studies, which mainly concentrates on public service provision in welfare-state systems. Another area of interest for SLB research is public management. This literature focuses on the positives and negatives of discretion, together with the strategies that public managers can employ to navigate the opportunities and challenges (Bannink et al., 2015; Nothdurfter & Hermans, 2018). Research on management has also been focusing on the relation between discretion and public administration reforms. On this side, the main research focus has been on New Public Management (Nothdurfter & Hermans, 2018; Zimmermann et al., 2014) and digital governance innovations (Buffat, 2015; Busch & Henriksen, 2018).

Despite the large expansion of this literature, we identify a gap in the relation between SLB and policy capacity. Following the seminal conceptualization by Wu et al. (2018), we understand policy capacity as the set of competences, skills, and resources needed to perform policymaking. In this paper, we identify a point of connection between SLB and policy capacity. Both the approaches share the interest on the *individual* dimension of policymaking and are concerned with the effect of individual behavior on policymaking. So far, the relation between discretion and policy capacity has been scarcely investigated.

Bridging these literatures, we aim to provide an original contribution to the debate on individual analytical capacities. To do so, this study will not adopt a mainstream approach based on the assessment of formal statistical capacities. Conversely, we will focus on the process of the development of a qualitative, pragmatic type of analytical capacities allowing for the redesign of the policy at the street level.

This paper aims to fill this gap, presenting the results of a local policy implementation study conducted in the metropolitan area of Turin (Italy). To this end, our paper deals with a twofold research question. On the one hand, it examines how and whether operators use their range of discretion to modify the policy at the implementation stage. On the other hand, it clarifies whether and how this action process helps operators develop specific policy capacities.

The case selected for empirical analysis is a public pilot project for the prevention of problem gambling in public venues. The expression “Problem gambling” defines behaviors causing damage to people's health and well-being, and potentially evolving into proper gambling addiction. In the case analyzed, the public service is taking a proactive stance in addiction services, placing a “task force” of social workers in proximity to public gambling venues to intercept problem gamblers and establish first contact.

Given the uniqueness of the policy and the absence of previous studies, we opted for a qualitative case-study methodology. The bulk of our data was collected through a longitudinal ethnographic study, adopting the method of participant observation. In preparation for the observation, we conducted a series of semi-structured interviews with the operators, as well as public managers at various levels of responsibility on the project.

The paper is structured in five sections. In the first, we present the theoretical framework, placing the study within the literature on street-level bureaucracy and policy capacities. The second section explains the methods, digging into the case study selection and providing a detailed overview of the data collection strategy, namely on the ethnographic observation and interviews. The third section deals with the research findings, retracing how implementers use their margin of discretion to change actions in process, departing from the initial policy design. The fourth section discusses the analytical capacities of the implementers and their development over time at the street level. The fifth section concludes, summing up the main contributions to the literature and suggesting potential insights for future research scenarios.

THEORETICAL FRAMEWORK

During the last 40 years, the street-level bureaucracy (SLB) framework has reached great fame and diffusion. Lipsky's (1980) work is now considered a classic approach to the study of policy implementation in the scholarly community. While earlier research on policy implementation (e.g., Bardach, 1977; Pressman & Wildavsky, 1973) followed a top-down approach, Lipsky's perspective on implementation stressed the importance of the "lower" hierarchical echelons of the State, at the encounter of citizens and public administrations. Following Lipsky, the attribute of "street-level" can be used to describe a wide variety of bureaucratic professions in numerous policy domains (e.g., teachers, doctors, social workers, policemen, etc.). Even though these professionals share very little in appearance (they serve different purposes and target different publics), all of them share some key characteristics identified by Lipsky (2010, p. 28) as: (i) inadequate resources; (ii) increased citizens demand; (iii) ambiguous and/or conflicting goals; (iv) difficulty in measuring performance and achievements; and (v) provision of essential services to citizens who have little or no alternatives to access such services ("nonvoluntary clients"). In such an environment, street-level bureaucrats make choices to cope with the challenges they face in their daily practice, adopt routines, and develop strategies to carry on implementation. The space in which these choices take shape is the margin of freedom, or discretion, allowed by context, norms, institutional settings, and individual characteristics (Cohen & Aviram, 2021; Lipsky, 1980, 2010; Thomann, 2015; Thomann et al., 2023).

The academic literature on SLB has mainly developed around the issue of service provision in welfare-state systems. The policy domains interested in current SLB research reflect this element, still being centered on the sectors discussed in the original conceptualization. Social welfare, education, healthcare, law enforcement, and employment still represent the main domains in academic studies (Chang & Brewer, 2022; Hupe et al., 2015; Nothdurfter & Hermans, 2018; Tummers et al., 2015). While the bulk of this literature focuses on policy analysis, another prominent stream of literature on SLB adopts the perspective of public administration and management (Bannink et al., 2015; Hupe et al., 2015; Nothdurfter & Hermans, 2018). An important contribution from public administration studies to the SLB framework comes from the studies on New Public Management (NPM). These reforms have, in fact, raised a series of issues regarding the traditional definition of street-level bureaucrats. While in Lipsky's terms SLBs coincided with public employees, the push toward marketization and privatization given by NPM created a new space of public action where public services can be contracted out to private or third-sector actors. In such a space, different governance configurations can take place, with different levels of discretion in the relations between private and public actors (see Zimmermann et al., 2014). Research has adapted to this hybridization by including the new governance structure in the SLB framework, stretching the definition of street-level bureaucrats also to the provision of public services by private and nonprofit actors (Cohen et al., 2023; Klenk & Cohen, 2019; Smith, 2012).

Recently, street-level bureaucracy has been receiving renewed interest, especially in relation to the introduction of digital governance innovations (see Busch & Henriksen, 2018). Information and communication technology (ICT) is reducing *vis-à-vis* contact between citizens and public administrators (*curtailment* effect). This can create a filter that can have negative effects, like the exclusion of people not in possession of access and familiarity with digital technology. The digital transition is also reallocating tasks from actual administrators to informatic procedures. From this perspective, SLBs might lose a relevant part of their role and run a risk of replacement, at least in part. Similarly, Busch and Henriksen (2018) talk about the shift from "street-level" to "digital" bureaucracy. On a more positive note, digital tools can be empowering for citizens (*enablement* effect). Direct feedback from citizens to administrations, quicker access to services, equal and unbiased treatment, and reduction of SLBs workload are all possible benefits of digitalization at the street level.

Another issue raising the interest in the SLB perspective is the reaction to the Covid-19 pandemic (Gofen & Lotta, 2021). Crises like the recent pandemic have highlighted the importance of SLBs in the speed and effectiveness of risk management and response, together with an expansion of the margin of discretion (Davidovitz et al., 2021), and adaptation to challenges (Lotta et al., 2021; Malandrino & Sager, 2021; Meza et al., 2021).

Scholars have also concentrated on the elements linking the SLB framework to the broader issue of *policy change*. The implication that SLBs can (and do) contribute to relevant changes in the policy process was already present in the original theorization of the framework. However, recent scholars have developed this topic in depth. Breit et al. (2016), for example, analyze the role of SLBs in the creation, maintenance, and disruption of institutions during the implementation of administrative reforms. The difference between the policy imagined and the one implemented is referred to by Gofen (2014) as *street-level divergence*. Such *divergence* represents a process of policy change, where street-level bureaucrats assume the role of de facto policymakers, rather than mere policy takers. This happens through a process of innovation and experimenting with new instruments in the field, inducing a redesign of the policy (Gofen et al., 2023). This iterative process of design, implementation, and redesign is also at the center of the scholarship on street-level entrepreneurship (Cohen, 2021). Linking SLB literature with John Kingdon's seminal work on policy streams (Kingdon, 1984), this stream of research analyzes the role of street-level bureaucrats as producers of policy change at the individual level as policy entrepreneurs (Cohen & Aviram, 2021).

In sum, the literature has clearly identified the importance of street-level bureaucrats not only on implementation but also on the larger process of policymaking (Dallara & Lacchei, 2021). However, we identify a gap in the study of street-level bureaucrats' skills and capabilities, the way in which these develop during frontline work, and the effect they generate on the policy outcomes. In other words, we hypothesize that the type and quality of change generated by SLBs depend, at least in part, on the specific set of skills and capabilities they possess.

To fill this gap, this paper bridges the SLB framework with the concept of *policy capacity*. Following Wu et al. (2018) we identify policy capacity as the set of competences, skills, and resources needed to perform policymaking. The conceptualization proposed by Wu and colleagues combines three types of skills (*analytical, operational, and political*) with three levels of resources (*individual, organizational, and systemic*). The issue of personal characteristics and the way these affect SLBs work has already been debated in the literature. For example, psychological characteristics (Tummers et al., 2012), attitudes (Thomann, 2015), and culture (Cohen, 2018) have been inquired to understand their effect on street-level performance. These studies, however, have not directly focused on the topic of policy capacity. Only a few studies directly address policy capacity at the street-level. Wellstead et al. (2011) analyze the perception of analytical capacity in Canadian administrations, noting a weaker perception at the street-level. Another reference can be found in Guy Peters (2018). Here, the knowledge possessed by street-level bureaucrats is identified as an important component of *expertise*, one of the main resources for the development of policy capacities. At the same time, discretion is presented as a challenge for the development of internal *coordination*. Lastly, one recent contribution by Andersen and Breidahl (2023) connects discretion and policy capacity in the study of Danish workfare reforms. The authors propose the concept of "capacity for discretion," meaning the necessary freedom of action required by caseworkers to implement services tailored to the citizen's specific needs.

Other than these few studies, the nexus between SLB and policy capacity remains underdeveloped. As highlighted previously, SLB literature has established a link between discretion and policy redesign, when implementers use their agency to modify the structure of the policy (i.e., policy divergence). The issue of divergence and redesign marks a point of contact between the literature on SLB and policy capacities which, to the best of our knowledge, remains largely unexplored. We believe that the topic of redesign by SLBs is closely related to individual analytical capacity. The individual element is rather self-explanatory, both literatures stressing the role of people as unitary actors in the process of policymaking. The analytical element, on the other hand, requires more careful discussion.

Analytical capacity is defined as the one helping "to ensure that policy actions are technically sound in the sense that they can contribute to attainment of policy goals if carried out" (Wu et al., 2018, p. 5) as well as "diagnosing problems and developing appropriate strategies for addressing them" (p. 6). So far, however, analytical capacities have remained confined to a *rationalist* and quantitative understanding. Examples include technical and statistical tools, such as modeling, statistical forecasting, data sharing skills, program monitoring, and communication (Howlett, 2009; Hsu, 2015; Pattyn & Brans, 2015; Weible et al., 2012).

We believe that the ability to diagnose problems and tailor appropriate strategies (i.e., analytical capacity as defined above) also applies to SLBs and their skills as policy redesigners (Barral & Ghosh, 2023; Cohen, 2021). The main difference we identify is that SLBs put less accent on technical-statistical tools and more emphasis on understanding policy problems through experience and designing solutions in a *pragmatic* fashion, a process defined by some authors as "bricolage" (Blijleven & Hulst, 2021; Holstead et al., 2021). This perspective opens the study of analytical capacities to a broader view of the policy process and allows for qualitative approaches to be included on a larger scale.

We argue pragmatic analytical capacities to be crucial during the implementation stage, especially in policy environments characterized by a high level of discretion and iterative processes of implementation and redesign. We also believe more research should be dedicated to the hypothesis that such capacities can be developed by implementers through their daily practice (i.e., learning-by-doing).

Against this backdrop, this paper focuses on the development of pragmatic policy capacities at the street level. The change and evolution over time of analytical policy capacities has been identified as one of the main gaps in the existing literature (Mukherjee et al., 2021). Following Karo and Kattel (2018) "the concept of capacity itself remains static in such analytical frameworks – capacity is either there or not." The same authors present an evolutionary approach to policy capacity linking the development of capacities to organizational routines and feedback. Despite the author's focus on the organizational dimension, these elements can provide insights about the mechanisms triggering the development of capacities over time also at the individual level. Johnson and Thomas (2007) relate the development to a mechanism of reflective inquiry, be it individual or in team. Other than these few studies, literature on the development of capacities falls short in identifying mechanistic explanations about the development of policy capacities.

Given the nature of frontline policy implementation, characterized by the incremental bricolage of policy solutions (Carstensen et al., 2023), we believe that the adoption of the SLB perspective can help discover some of the dynamics leading to the development of individual analytical capacities in a pragmatic fashion.

In this paper, we adopt a bottom-up perspective to the study of policy capacity to answer the following questions: *How did the operators use their margin of discretion to redesign the policy during implementation? Did this process imply the development of individual analytical policy capacities at the street level?*

METHODS

Case selection: The "Time is money" project

The case picked for analysis is an experimental project, by the name of "Time is money,"[1] in the field of problem-gambling prevention and treatment. The main objectives are raising awareness of risks among gamblers, promoting responsible gambling practices, and facilitating early access to treatment services.

The project is located in Piedmont (North-West Italy) and is coordinated by the Addiction Departments of two public Local Healthcare Agencies.

The project was launched in 2021 as part of the Regional Plan for the contrast to pathological gambling. In such plan, Time is money is meant to be implemented concurrently with long-standing institutionalized regional policies for the management of gambling addiction, such as counseling desks for psychological support and financial help initiatives, following Piedmont's history of local interventions in the field of problem-gambling (Rolando et al., 2023). The plan is oriented to deal with a relevant and resource-depending issue for the regional healthcare system. The most accurate estimates calculate one third of Piedmontese residents over age 18 gamble at least once per year, corresponding to over 1 million people. Over 400 000 of them have a yearly income below 15.000€, and over 55 000 are estimated to have moderate or severe risk of gambling addiction (Benedetti & Molinaro, 2022). Despite the strong commitment to the issue, however, access-to-treatment rates remain low for problem-gamblers. Research has shown that among the many barriers to treatment, social stigma toward clinical treatment and addiction services is one of the main issues (Rolando et al., 2023), together with a diffused criticism of the States' morality and accountability (Bassoli et al., 2021; Ferraiolo, 2013). To face these challenges, the "Time is money" project has been launched.

The project is based on a change of approach to treatment services from passive to active. While the traditional approach requires the person to look for help, in this project the public service is reaching out to the people at risk. In practice, mobile units of specialized operators, moving in camper vans, are deployed to intercept (*outreach*) gamblers in front of gambling venues, such as betting shops, casinos, or bingo halls. This approach is inspired by the *harm reduction* initiatives in contrast to substance abuse, where operators and volunteers offer help to drug and alcohol abusers directly at the place of consumption. Despite the long experience of such initiatives on drugs and alcohol worldwide, there is no evidence of applications of harm reduction on the issue of problem gambling. Given the unprecedented nature of this approach, the decision of the regional committee and the Local Healthcare Agencies has been to launch a pilot project on a small scale.

The formulation relies on two key principles, rooted in behavioral therapeutic psychology: (a) *pre-commitment*, which invites people to make commitments to themselves with respect to a behavior considered pathological or risky (Sulkunen et al., 2019); (b) *contingency management*, which involves rewarding the individual for demonstrating desired behavioral changes, by means of benefits and prizes (Petry et al., 2018; Zajac et al., 2018).

From a practical viewpoint, four main actions are supposed to be implemented in the field: (1) provision of *information material*; (2) *benefit agreements* to reduce the time spent inside the gambling venues by means of symbolic rewards; (3) download of the *digital app* for monitoring one's own expenditures; and (4) early psychological *counseling* for at-risk gamblers.

Operationally, the choice has been to retain the management of the project inside the Local Healthcare Agencies, but to outsource the implementation to an external contractor. Aware of the fact that no organization could fully meet the requirements, given the absence of previous similar projects, the local Healthcare Agency applied the *proximity principle*. This meant opting for a cooperative society with consolidated experience in the field of substance abuse (a sector considered contiguous to the policy in question) and limited experience on the topic of gambling, although on services different than Time is Money.

Despite the experience in both harm reduction and gambling prevention, the selection of the personnel to deploy in the field was conducted autonomously by the contractor cooperative society. Following internal organizational logics, the resulting team of operators was mainly composed of social workers with experience in harm reduction in drug use contexts. None of the operators had previous professional experience in gambling prevention initiatives.

In agreement with the cooperative, the Local Health Agencies identified the venues where the activity is to be carried out. Starting from the metropolitan area of Turin, the decision was to establish weekly or biweekly stations in front of gambling venues in the territories of seven municipalities. Prior to the beginning of the activities in the field, all the permits for the use of public space were obtained, and the managers of the gambling halls were informed by the Healthcare Agency. This ensured compliance by venue managers and personnel, minimizing the chance of conflicts.

The choice of this project as our case study is dictated by several reasons. To start, the policy represents a good case for the application of the SLB framework. The project, in fact, literally takes place at the street level: the operators work in the open, moving on camping vans (to be used as mobile offices) parked outside gambling venues. Due to a relevant level of novelty and ambiguity of the policy, the operators have a wide margin of discretion in the implementation of the policy actions (Fowler, 2021). The operators, despite being formally part of a third-sector organization, are providing a public service in direct contact with a vast array of beneficiaries, under the authority and accountability of a public body (the Local Healthcare Agencies). All these characteristics make the operators fit for the title of street-level bureaucrats. In addition, due to the lack of previous knowledge or experience, this case represents a unique opportunity to observe a process of policy capacity building. The SLBs' only existing experience is in substance abuse harm reduction, but the transfer from this practice is extremely limited. All these elements make the "Time is money" project a good case study for our research.

Despite the element of novelty, the project possesses many elements that are common to other frontline implementation contexts, such as scarcity of resources, high service demand (as shown by regional gambling statistics), flexibility of goals, and complexity of enforcing performance management. All these elements, already highlighted by Lipsky's original SLB conceptualization (1980), are common to a large set of welfare policies. For this reason, we believe the selection of this case can provide insights valid beyond the specific implementation context. Additionally, the specific case, being a pilot project, presents a "light" control structure, including basic performance management and monitoring systems, which do not reduce the room for maneuver of individual implementers.

Lastly, on a more pragmatic side, this research can produce useful evidence supporting the adoption of evidence-based policies in the domain of gambling, given the scarcity of implementation studies recently highlighted in the literature (Aimo et al., 2023).

Data collection

Data collection has gone through three main phases. First, attention has been dedicated to desk research activities. We used this phase to deepen our knowledge about our case, other gambling policies (local, national, and international), as well as the topic of harm reduction. Our review included scientific publications, reports, gray literature, and the project's administrative documents.

The second phase has been characterized by a series of semi-structured interviews with the key actors involved in the "Time is money" project. The interviewees have been selected to represent all the pivotal actors involved in both the formulation and implementation stages of the project. The heterogeneity in their roles and organizations has made possible to reconstruct the original design of the policy and its goals, together with the events of the first months of implementation, prior to the participant observation phase. To this extent, we conducted a total of seven interviews involving eight people: Four operators of the project, one manager from the contractor cooperative, and three managers from the Local Healthcare Agencies.

The interview guide collected data on various aspects of the project, based on the interviewees. With managers, we focused on the history of local harm reduction and gambling policies, past professional experiences, project rationale and design, selection of personnel and gambling venues, difficulties encountered, and opinions on the current state of implementation. With operators, we focused on professional histories, barriers and facilitators encountered during implementation, the state of implementation of each policy action, relations with the gamblers, problems faced, and solutions adopted.

The third phase has been dedicated to in-depth ethnographic research in the field. We believe this approach is particularly suited for our study. Ethnographic methods, in fact, are best employed when researchers are confronted with the explanation of phenomena connecting different theoretical strands and theory development in general, rather than theory testing (Hammersley & Atkinson, 2019). As in our case, ethnography is usually adopted to produce knowledge from the in-depth study of rather small-scale settings with specific time frames and locations (Bayeck, 2023). Also, we believe ethnography can offer a privileged viewpoint to understand the agency of SLBs, through a direct observation of their practices and routines and their agency (Hupe, 2019; Kekez, 2019), which is especially suited to pursue our interest in pragmatic capacity development at the street level.

We adopted the method of participant observation in three gambling venues included in the project, located in the metropolitan area of Turin in areas with common sociodemographic characteristics. On the field, we adopted a semi-covert observation strategy, in which our identity and the full extent of our research were disclosed to the operators but kept concealed from the gamblers. During fieldwork, we joined the operators so that we could be identified as members of their team by external observers. This gave us the opportunity to closely observe the interaction between operators and gamblers with minimal interference. In total, we joined the operators at their stalls on 16 consecutive field interventions. Each researcher observed the same gambling venues continuously to increase the depth of observation and develop a better understanding of the specific contextual dynamics. One researcher was stationed at a bingo hall (once per week), while the second researcher was stationed at two betting shops (once every 2 weeks). We accumulated a total of 84 h of participant observation between the months of April and July 2023. At the time of our entrance into the field, the implementation was at an appropriate level of maturity for the analysis of potential policy capacity-building dynamics, having started in January 2022.

The observation protocol focused on the operator's daily practice on the job, the outreach, the delivery of the benefit agreements, gambler–operator relations (both short term and repeated interactions), discretionary choices, and strategies adopted on the field. Following the most established practice of ethnographic research, we took short notes (*jottings*) on the field, and then compiled extended, in-depth fieldnotes shortly after the end of the observation. The two authors also shared and discussed each other's notes to reduce *tunnel vision* and stimulate new research insights.

Given the small number of people involved in the project, we adopted a series of measures to grant anonymity to all the personnel involved in the research. All the data collected have been anonymized, and all references to specific venues have been removed. As a further precaution, when quoting or referencing material from interviews or fieldnotes, all operators' and managers' sex and gender have been anonymized by the substitution of all personal pronouns with the form *they/them*.

FINDINGS

"Time is money" represents a pilot project with no precedents in the realm of problem-gambling reduction policies. Due to the lack of comparable experiences on both local and international scales, at the formulation stage, the Local Healthcare Agencies had to structure a proposal without transfer from proven patterns of action. As explained by one manager of the Local Healthcare Agency, "Time is money" represents a unicum, that is, an unprecedented pilot project which tries for the first time to apply the harm reduction approach to pathological gambling:

> There is no similar project around the world. There is a lot of work on pre-commitment but no similar initiative […] There are some street units for gamblers around Italy, but they only do information work. There is one in Sicily, another in the Province of Cuneo, and a third somewhere else, but none of them carry out the kind of work we do.
>
> [Int. 6—Manager].

Hence, we can argue that the high innovation gradient led to a situation characterized by high uncertainty. In addition, the uncertainty combined with the experimental nature of the implementation context allowed operators to rely on a considerable range of discretion. Within the team, all operators had the same tasks and the same range of discretion. Moreover, we did not detect any significant difference in their motivation and use of discretion to generate better policy outcomes, neither in the interviews nor during participant observation.

In the following paragraphs, we will illustrate how, for each of the actions, the operators developed strategies to adapt the policy to the implementation context. Drawing on the collected data, we will present and analyze the street-level divergence (Gofen, 2014) between the original design of the policy and its evolution during the more advanced stages of implementation (Table 1).

TABLE 1 Policy divergence between early and later stages, with adaptation strategies.

Policy action	Early stages (policy design)	Later stages (policy redesign)	Adaptation strategies
Distribution of information material	Passive approach (waiting)	Proactive approach (engaging)	Hooking
Benefit agreements	Time-based only	Money-based	Bargaining
	Proposed at the exit from the halls	Proposed at the entrance	
	In the form of essential goods	In the form of recreational goods and services	
Smartphone App	Invite users to download the web app	Ignore the app and focus on other actions	Termination
Counseling	Early psychological counseling interviews	Informal talk for risk assessment and trust building	Conversation
	Inside the camper van	Open-air	

Source: authors' own elaboration.

Distribution of information material

The information material consists of general brochures on the project and flyers dedicated to individual types of games (gaming machines, bingo, scratch cards, etc.). Inside each flyer are the Local Healthcare Agency contact details, data on winning chances, game mechanics, useful indications to assess problem-gambling risk, and practical suggestions to reduce harms.

During early stages, the operators took a "passive" approach to the distribution of the leaflets: They waited for people to come looking for information about the project, counting on the fact that the camper van could intrigue passers-by. Also, they assumed that problematic gamblers were spontaneously inclined to seek contact with the operators, as they were eager to tell their stories and seek help. Lacking specific expertise for the current project, the initial approach of the operators relied on their long-standing experience in substance-related harm reduction projects, where they provided information, sterile devices, and offered support and first aid in case of emergency, without having to search for consumers. In our case, this passive initial approach is well explained by a manager and an operator:

> It was not easy, at least until they became familiar with the people. They knew they had to engage people who were not willing to be helped. They expected resistance from their interlocutor in the beginning. […] They were, on average, scared because they realized they could not take examples from past experience. In the world of nightlife [drugs harm reduction, eds.] it's different.
>
> [Int. 1—Manager].

> In harm reduction activities with drug users, it's them who come looking for us at the stall, because we distribute clean, sterile tools to take the substances. With gamblers it's different, we don't distribute anything that facilitates gambling. At the beginning of our work the number of interactions was very low, because we waited for them to come to us asking for help. Sometimes, when gamblers saw the camper van, they mistook us for COVID-testing personnel!
>
> [Int. 4—Operator].

Over time, however, a radical change occurred. Gradually, the operators realized that the *wait-and-see* strategy did not bring the desired results, limiting the opportunities for interaction with the gamblers. Recognizing the ineffectiveness of their approach, the operators began introducing a proactive approach, directly engaging the gamblers before they entered the gaming hall. As emerges from the ethnographic notes:

> Interactions are very quick. Everything takes place over the course of a few moments, in the couple meters separating the stall from the entrance to the gaming hall. Everything is at stake in those few seconds. […] A man in his sixties, accompanied by his partner, accepts the flyers. "Here is some information on how not to lose too much money," the operators tell him. "If I go in here, I'm screwed anyway" he replies, laughing, while he takes the flyers and heads for the entrance. Everything unfolds dynamically, without stops or pauses. It is the operators who approach people on their way to the hall's entrance.
>
> [Fieldnotes—Day 1].

A further remarkable change in approach emerged between the initial stages and the advanced ones we observed. Considering the initial condition of uncertainty, the operators developed a new strategy to adapt the policy. In this case, they developed new and more effective ways to gain the attention of recipients (hooking), according to the context in which they found themselves operating. Such a strategy may take different forms depending on the individual operators. Some of them are more direct and insistent in leafleting, even with the most skeptical recipients, while others are more discreet and accommodating. Regardless of the specific form, the hooking strategy was developed by the operators during the period between the start of the project and our observation. In order to achieve the goal of hooking the gamblers, the operators had to develop different techniques from those initially imagined, moving from a *wait-and-see* strategy to proactive engagement, not standardized, but tailor-made according to the user's characteristics.

The benefit agreements

The benefit agreement consists of an informal deal between operators and gamblers to stimulate self-control, risk limitation, and harm reduction. The action is intended as a reward to gamblers who demonstrate compliance with a commitment. According to the policy design, the agreement was supposed to be based on three distinctive features. First, the operators were required to negotiate with the gamblers an amount of time to spend in the gambling hall, inferior to what was initially planned. In exchange, the gambler would be rewarded with a *benefit*. Second, the Local Healthcare Agency expected the agreements to be made at the exit of the gambler, based on the belief that, at the end of the gaming session, gamblers would be more likely to interact with the operators, venting frustration, and sharing anxiety and concerns. Hence, the operators had to take advantage of the gamblers' availability and introduce them to the agreement, inviting them to spend less time in the gaming hall the following week, when the operators would be present again. A third aspect concerned the choice of benefits. According to the original design, the operators would distribute food or vouchers to spend in groceries or supermarkets for the purchase of essential goods. The rationale was to make the gambler understand that spending less time in the hall would increase their spending capacity to provide for their own needs and their families.

Also, for benefit agreements, we observed remarkable differences between the planned policy and its implementation. The first difference lies in the choice of the unit of measure. The operators considered not only the time spent in the gaming hall but also the amount of money. In practice, they started asking the gamblers about the budget that they were willing to spend before the entrance. When gamblers exited, they presented the receipt to the operators: If the amount was equal to or less than the planned budget, the user would be rewarded.

The second difference is related to the modes of stipulation. In stark contrast with the original design, the benefit agreements are not stipulated when gamblers exit the gaming halls, as a pledge for the next gaming session in the following weeks. On the contrary, due to the difficult implementation of the initial idea, the agreement happens at the entrance. In fact, the chance of meeting a second time with the same user after a week turned out to be very low. For this reason, the operators chose to stipulate the benefit agreements with gamblers at the entrance. This also meant connecting the *hooking* strategy with the benefit agreement. This dynamic emerges clearly from the ethnographic field notes:

> Around 4 pm, three people came up. An elderly man with long hair styled in a ponytail, wearing a white shirt, together with two women. Judging by their age, I assumed they were his partner and daughter. One operator approaches them and delivers the informative material. While taking the material, the elderly man says "I am not a pathological gambler" and laughs. The operator replies "Then, would you like to win one of our benefits? If you get out before 6 pm, you will win". Confident in their ability to fulfill the bargain, the three gamblers accept the benefit agreement. Despite their confidence they will not exit the hall before I leave the field with the team. I will not see them again.
>
> [Fieldnotes—Day 2].

The third difference lies in the types of benefits. According to the policy design, the operators were given the chance to choose the specific products to use as benefits. Relying on a considerable margin of discretion, the operators chose to put aside the benefits for essential goods (e.g., discounts for groceries and supermarkets) and opted to purchase coupons for recreational activities and beauty products (e.g., sport activities, discounts for bookshops and skin moisturizer samples). The operators considered those benefits a more attractive alternative to gambling.

Also in this case, the operators put in place improvements to the policy action. Leveraging the wide margin of discretion at their disposal, the operators adapted the benefit agreement to the context, deploying a strategy of *bargaining*. In other words, they introduced changes oriented to gaining bargaining power, thus making the agreement more attractive to gamblers, improving overall effectiveness.

Smartphone app

In the design stage, the Local Healthcare Agencies decided to launch a smartphone app that would help gamblers develop their ability to self-control. The app should allow the user to monitor the time spent in the gaming hall, keep track of the expenses, and set periodic goals. At the technical level, the design of the app has been commissioned to a team of software developers. Although the design does not have a particularly advanced architecture, some difficulties emerged in relation to privacy policies in public administrations. Consequently, the app has been going through a lengthy process of administrative clearance before any testing in the field could be done by operators. In the Healthcare Agency's plans, the app should have been a user-friendly tool, accessible to all categories of gamblers and downloadable autonomously by the user, as explained by an official from the Healthcare Agency:

> Our aim was to have a tool to mediate the relationship. The app was to be downloadable at any time, not necessarily in the presence of the operators, and was meant to serve as a personal diary, to track one's progress and generate dynamics of self-control. It was to be a point of reference in the project.
>
> [Int. 1—Manager].

The long and troubled path of development and refinement, however, generated important changes with respect to the initial design, especially in terms of accessibility. In fact, due to administrative concerns about the privacy policy, the app was not autonomously downloadable by gamblers but required operators to access a dedicated website through the user's phone.

At the time of our fieldwork, the app had been launched. Nonetheless, the already mentioned accessibility issues made its use very cumbersome. Especially the mandatory access via the website, to be done with the operators' support, represented a strong deterrent for gamblers who have shown skepticism about downloading the app. Paradoxically, the final product developed in strict compliance with administrative privacy policies was welcomed with distrust by the users, skeptical toward the complex process of subscription. Indeed, they showed little confidence in the anonymity of the app and chose to forego the tool:

> There is an app to help the gamblers monitor their gambling habits. People should upload data on the amount of money they spend. It should help you to be honest with yourself. It has only been available for a short time. I haven't seen any concrete results yet. It seems to me that it's difficult for the gambler to accept something of ours [from the project, eds.] on their phone. The access to the app has to go through us, so that's already a barrier.
> [Int. 3—Operator].

Understanding the flaws of the app, this policy action has been de facto gradually terminated by the operators in their daily practice. As emerged in the interviews, while in the months preceding the observation, the web app was proposed as a tool for monitoring gambling dynamics, when the study took place, due to the aforementioned barriers, operators decided to terminate the action and dedicate more attention to others. Indeed, during the participant observation period, the web app was rarely proposed by operators and was never downloaded by gamblers.

The evolution of the app shows that operators chose *termination* as the adaptation strategy. This allowed them to redistribute their resources (i.e., temporal and cognitive) toward actions that proved to be more efficient, such as the benefit agreements and counseling.

Counseling

The fourth policy action is counseling. According to the plan, the operators were to offer gamblers an early form of psychological counseling to gather information on gambling patterns, assess problem-gambling severity, provide support, and discuss the opportunity to enter treatment for those in need. Counseling, in the policy design, was supposed to take place preferably inside the camper van, offering gamblers a private, protected, and comfortable space. Here, in theory, gamblers would have found a chance to open up, tell their story, receive assistance and advice to foster self-control. Counseling was meant to go beyond the other policy actions, open a channel for in-depth dialogue, and initiate a pathway of psychological care as a gateway to treatment in public services.

> We have pragmatic concerns: you interact to do what? […] Once I catch your attention, if I don't know how to continue, the intervention is dead. Also, the camper van is set up with an indoor interview room. It would have made sense if it had been used for counseling. […] That was the idea, it had to be used to conduct interviews [psychological interviews, eds.]
> [Int. 1—Manager].

As in the case of the other actions, counseling was subjected to significant changes by the operators during implementation. In this case, our observations highlighted a shift from the early psychological counseling model to a type of informal talk. This meant a shift from an intensive, formal, and indoor dialogue to a relaxed, informal, and open-air talk taking place close to the stall.

These changes should not be intended as an indicator of scarce professionalism or ineffectiveness of the intervention. With the talk, in fact, the operators can investigate the gamblers' habits and assess their risk profile. If the person presents particular "red flags," the operators can continue the talk to establish a relationship of trust. Later, they can put the person in contact with public addiction services to evaluate entering treatment. Also, moving to open air allows for several advantages. First, moving inside a closed space accompanied by operators turns out to be embarrassing for gamblers. Entering the camper van is seen as a symbolically charged action, especially considering the heavy social stigma and self-stigma associated with problem gambling (Rolando et al., 2023; Sulkunen et al., 2019). Conducting counseling outside, at an appropriate distance from the main flow of gamblers to ensure the necessary privacy, greatly reduces the shame induced by stigma. Also, it may stimulate other gamblers to imitate their peers and get in touch with the operators.

Here again, the initial lack of competence by operators in the area of counseling and psychological assistance led to the use of discretion to redesign the policy action. We could thus see the adoption of an adaptation strategy we named *conversation*, functional to support and carry on the counseling activities in the talk format.

As a practical example, the following account from field notes shows the importance of conversation as a strategy to obtain gamblers' trust. Shortly after the launch of the project, the operators understood that knowledge about the technical details of games, and the dynamics in the halls were paramount for conducting counseling. In order to gain the trust necessary for making gamblers open on sensitive topics, operators had to prove able to put themselves in gamblers' shoes. For this reason, operators decided to enter the halls and play as a form of learning experience:

> During a quiet moment, one of the operators tells me that, during the early stages of the project the team decided to play a few games in the halls, outside working hours. They did this to learn, in order to understand the game mechanics and thus be able to sustain the conversations with the gamblers. In fact, they added, it was common for gamblers to drop the conversation when discussing the technicalities of the games. The operators understood that being unprepared on this topic caused gamblers to lose interest in the conversation and consequently in the project. Feeling unappreciated, it was impossible for them to trust the operators and the public service.
>
> [Ethnography 1—Day 3].

DISCUSSION

In the previous section, we presented the evolution of the four key policy actions over time. We highlighted the development of strategies to adapt the policy to the context (*hooking, bargaining, termination*, and *conversation*). These elements highlight a process of policy change conducted by the operators, characterizing our case as an example of discretion at the street level. The adaptation strategies deployed by the operators have generated a change not only in the delivery of policy tools but also in the policy's framework. We can talk about a case of *street-level divergence* (Gofen, 2014; Thomann et al., 2023) in which street-level bureaucrats (the operators) assume the role of *policymakers* besides the one of implementers. They are thus capable of assessing and redesigning the policy actions during implementation, based on contingencies and emerging needs.

As pointed out in the theoretical section of the paper, a crucial element for every action of design (or redesign) is the individual policy capacities of the actors taking part in the process. Analytical capacities are especially important, meaning the actors' capability to elaborate and analyze data and information for the identification of problems and the design of solutions. Considering the policymaking role assumed by SLBs, the development of these capacities at the street level is a highly relevant topic.

In response to our research question, the analysis of our case has highlighted two main elements relevant to the academic debate: (1) the importance of pragmatic analytical capacity at the street level, and (2) the development of such capacities over time during frontline implementation. Both will be presented below.

Grounding on the interviews and ethnographic field notes is possible to reconstruct a series of occasions in which the operators have shown to possess pragmatic analytical capacities. These are used to critically assess the policy actions, the overall policy framing and problem definition, as well as the outcomes. Our data confirms the hypothesis that the scope of analytical capacity can span beyond the technical-statistical understanding, typical of mainstream literature (Howlett, 2009; Wu et al., 2018), and include a *pragmatic*, experience-based understanding observable in frontline implementation practices. We believe this alternative understanding of analytical capacity can enrich the existing theory, without questioning the foundations of the established framework. Both understandings (technical-statistical and pragmatic) fit the existing definition which states “to ensure that policy actions are technically sound in the sense that they can contribute to attainment of policy goals if carried out” (Howlett, 2015). Yet, recognizing that specific capacities can take different forms opens the debate to a more nuanced conceptualization of capacities in the policymaking process.

Two examples from our field notes can help to better portray the pragmatic understanding of analytical capacities:

> Today it's raining, and few people stop by our stall to speak with us before entering the gambling hall. While we try to hide under our repair, one operator and I have the time to chat and exchange some words. The operator then proposes to me a sort of thought experiment. They would pose me a series of “tough relevant questions” about their job, and I would have to play the “devil's advocate”, as if I were an operator myself. The questions were the following: “would you consider this project a failure if we won't observe a growth in the number of treated gamblers in local public services?” and “How would you reply to anyone saying this job is a waste of public money, because we stay here all day doing nothing?” and again “how would you react to someone accusing us of being secretly friends with the gaming hall, thus pushing people to gamble more?” In their mind, they continue, these kinds of questions are to be expected from “ignorant people”. Still, knowing how to answer them is of paramount importance.
>
> [Field notes—Day 3].

> While distributing information materials, one of the operators reveals to me that they are trying a new technique to establish a first connection with some gamblers. They say that many of the gamblers are “known faces” by now. They also learned how to detect some clues about people's behavior. For example, they can guess if a person will be more or less resistant to involvement. With others, they tried to approach in the past, but have been rejected. Instead of handing out the information material as usual, they are asking questions like “How did it go today?” or “So, did you win today?” while they exit from the venue. Only in case of an answer, they hand over the material, as a follow-up to the short verbal exchange. Doing this, they are trying to understand if those “tougher” people can be hooked
>
> [Field notes—Day 4].

The first quote portrays analytical capacities in the form of reflective inquiry. Here, the operator is showing the capability to collect data from the surrounding environment and feed it into a reflective process (which can happen both individually and in small group) during implementation. The dialogue between the researcher and the operator reflects the latter's genuine interest toward many aspects of the policy. These are expressed in the three questions: policy outcomes, cost-effectiveness, and accountability. The second quote portrays the pragmatic bricolage employed by SLBs to face identified problems by incremental adjustments and through the interpretation of feedback. Based on a process of trial and error, the operators gradually adjusted the policy to fine-tune the actions. Starting from an already established adaptation strategy (hooking), they try to improve it by marginal corrections, with the goal of including a larger target population. This implies a qualitative interpretation of feedback to incrementally adjust the policy design.

Both the elements of reflective inquiry and feedback are related to the literature on the development of policy capacities over time, as presented in the theoretical section (Johnson & Thomas, 2007; Karo & Kattel, 2018). Thus, grounded in the empirical work presented above, we can present novel evidence on the mechanisms explaining such processes of development.

Our analysis has highlighted the difference between the initial and the advanced states of implementation of the policy. In the first phase, implementation has been characterized by uncertainty, mainly due to the novelty of the policy. In fact, the SLBs' background in drug abuse contexts did not offer a privileged starting point. The implementers quickly realized the differences in the type of consumption (drug use vs. gambling), venues (rave vs gaming hall), and consumers' perception of their own behavior (illegal and socially stigmatized vs legal and tolerated). In turn, the stark contrast between the initial (T_0) and later (T_1) stages suggests the existence of a process of capacity development at the street level. In addition, the interviews with the managers confirmed the absence of any top-down capacity-building intervention. This allows us to argue that capacities have been developed from the bottom up by the SLBs during their daily practice on the job.

This process can be represented as a mechanism composed of four main blocks (Figure 1). The first block, problem identification, is the moment in which the individual implementers, following the original design, perceive a dissonance between expected and actual outcomes. The identification represents the starting point leading to the second block, reflective inquiry, as presented in the previous paragraph. From the reflective inquiry, implementers can develop one or more adaptation strategies to address the identified problem, as shown in our empirical findings (in our case, hooking, bargaining, termination, and conversation). When implementers put in place adaptation strategies, they start to receive qualitative feedback. The elaboration of such feedback represents the fourth and final block.

This process can take a linear as well as a circular trajectory. When implementers receive positive feedback, solving the initial problem, the process concludes (linear process). In our study, this occurs when operators redesign the counseling action with the conversation strategy. In this case, the operators consider the solution satisfactory, thus stopping the process of development of additional capacities. Conversely, when implementers realize through feedback that the action needs to be further refined, they reinitiate the process (circular process). A similar case is mentioned in the field notes above, when the operators try to improve the hooking strategy to engage even the most skeptical players. In this example, the operators continue developing their capacity to achieve a more consistent solution.

This reconstruction sheds light on the link between street-level discretion and the development of policy capacities. The evidence presented in this paper highlights the existence of an original kind of analytical capacities, proper of street-level implementers, which is being developed from pragmatic experience.

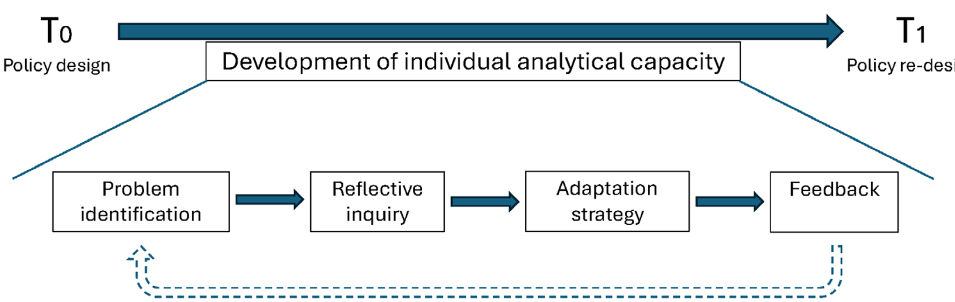

FIGURE 1 Development of individual analytical capacities over time at the street level.
Source: author's own elaboration.

CONCLUSIONS

The paper analyses how operators of a dedicated gambling harm reduction policy can modify a policy at the implementation stage and develop specific policy capacities. The operators implementing the "Time is Money" project demonstrated their ability to use their wide range of discretion to modify, fix, and refine the policy design according to the characteristics of the gamblers and the context of implementation. Each of the four actions, (the distribution of information material, the stipulation of benefit agreements, the counseling, and the web app) have been modified from the initial design to meet contingencies and needs.

Due to the high rate of experimentation and the uncertainty of a pilot project with no precedents, the practices of implementation brought the operators to question the theory of intervention, make amendments, and improve capacities over time based on their experience.

Our research is a first step in the direction of further studies about the relationship between street-level discretion and policy capacity development.

From the side of SLB research, our work brings fruitful contributions to some key topics. We believe attention to policy capacities can enrich the study of SLB performance and policy outcomes (Thomann, 2015), or the topic of street-level entrepreneurship (Cohen, 2021), especially from a comparative perspective. To this extent, future research can investigate whether and how different configurations of policy capacities produce variations in policy outcomes during street-level implementation.

From the side of policy capacities, while the policy and public administration literature has so far pointed out the importance of analytical policy capacity for public officials and staff in technical-statistical terms (Howlett, 2015), our findings suggest that street-level bureaucrats can develop pragmatic analytical capacities based on *problem identification, reflective inquiry, adaptation strategy, and feedback*. Our findings suggest that street-level bureaucrats can trigger the development of capacities based on qualitative reflection and incremental learning to accomplish policy goals. Indeed, to deal with a wide range of issues, ranging from the skepticism of gamblers to the effectiveness of benefits distribution, the SLBs we observed undertook a process of reflection, analysis, and elaboration of the feedback received from the implementation context. Grounded on a relevant level of discretion, the iterative process of fixing and refining turned operators into policy redesigners capable of readapting the rationale of the intervention according to the data. Our research opens the debate on mechanisms underlying different types of individual analytical capacities. Further research might expand this approach by including the other dimensions (i.e., organizational and systemic) and types (operational and political) in the mainstream conceptualization of policy capacities (Wu et al., 2018). Additionally, this paper contributes to the temporality gap (Mukherjee et al., 2021) outlining mechanistic evidence on the development of capacities over time at the street level. Further research can investigate different patterns of development, also including top-down approaches.

Lastly, our paper leaves prominent empirical knots to be disentangled. One problematic element concerns the potential consequences of the incorporation of the pilot project into a full-scale formal policy program. To this extent, several scholars stressed that the institutionalization and standardization of pilots may lead to a relevant reduction of the margin of discretion of SLBs (Bovens & Zouridis, 2002; Civinskas et al., 2020). If such a dynamic were to occur in this case study, the findings regarding the capacity building process would have to be reexamined and supported by new empirical evidence. In this case, we can put forward some hypotheses. One is that, even in the occurrence of reduced discretion due to stricter formal policy requirements, the development of individual capacities could take place. In fact, it is safe to assume that discretion cannot be completely eradicated, especially in policy fields that require tailoring solutions to the target population, as in most of the traditional domains of SLB research. This implies that in their discretion space, implementers could still trigger mechanisms for capacity development similar to the one we discussed. However, ad hoc investigations would be required to analyze the degree to which stricter rules can influence such mechanisms. In another scenario, the evidence from the pilot project could be collected by the responsible Administration and fed to the large-scale program (e.g., formal training for new operators based on the evidence from the pilot), adding a top-down dimension for capacity development. Like in the previous hypothesis, we can assume that operators could develop their capacities on the field, although careful analysis would be needed to assess the potential contribution (or hindrance) of top-down training on the bottom-up dimension of capacity development.

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The authors have no conflicts of interest to declare.

DATA AVAILABILITY STATEMENT

The data that support the findings of this study are available on request from the corresponding author. The data are not publicly available due to their containing information that could compromise the privacy of research participants.

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Endnote

[1] https://www.regione.piemonte.it/web/temi/sanita/prevenzione/asl-to3-capofila-progetto-tempo-denaro.

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