

A blessing from above?

A study on the implementation of the provision on
Organisational and social work environment in Swedish
schools

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Abstract

Reports of teachers experiencing negative psychosocial work environment are increasing in Sweden, despite existing policies and provisions in place to ensure an adequate work environment. This study investigates the implementation of a provision created by the Swedish Work Environment Authority in 2015, the provision on Organisational and social work environment, in schools. Two actors are in focus, safety representatives and headmasters, as they are both key actors within the implementation of this provision. Qualitative interviews have been conducted with four headmasters and four safety representatives working in different schools in Sweden, in order to find out how they exercised discretion in the implementation of the provision and what barriers and opportunities they encountered. The study mainly uses Lipsky's theory on street-level bureaucrats as theoretical framework. Barriers that were found were negative social dynamics at the workplace and a lack of cooperation between headmasters and safety representatives. Opportunities that were found were the use of legal frameworks for safety representatives in order to facilitate implementation, as well as the clarity and language used in the provision.

Key words: implementation, safety representative, headmaster, work environment, discretion.

Words: 19638

Acknowledgements

I would like to thank three people in particular, without whom this thesis could not have been written.

Tomas Bergström, who helped me through his feedback and guidance.

Antoinette Hetzler, who introduced me to the topic of teachers' work environment.

Kristoffer Tingbacke, who encouraged me from beginning to end.

I would also like to thank my family and my friends for their love and support.

To my classmates in the WPM programme, thank you for two memorable years together and I wish you all best of luck.

Last but not least, I want to thank all participants in this study.

I dedicate my final acknowledgements to teachers everywhere - thank you for being part of the backbone of society.

Table of contents

1	Introduction.....	1
1.1	Aims and research questions	3
1.2	Disposition	4
2	Theoretical framework.....	5
2.1	The study of implementation.....	5
2.1.1	Street-level bureaucrats	8
2.1.2	Context matters	10
2.1.3	Barriers and opportunities for implementation	11
2.1.4	Policy intention	12
3	Methodology	15
3.1	Ontological and epistemological positioning.....	15
3.2	Research focus and delimitations	16
3.3	Research design.....	17
3.3.1	Interviews	17
3.3.2	Sampling methods	19
3.3.3	Ethical considerations	20
3.3.4	Complementary method	20
4	Analysis.....	21
4.1	The intention and content of the provision.....	21
4.2	Implementation of the provision	24
4.2.1	The language and clarity of the provision	25
4.2.2	Uses of the provision.....	28
4.2.3	The headmaster's obligations.....	30
4.2.4	Safety representatives' strategies for implementation	32
4.2.5	Dual roles	38
4.2.6	The importance of cooperation	39
5	Conclusion	42
5.1.1	Opportunities in the implementation process.....	42
5.1.2	Barriers in the implementation process	43
5.1.3	Concluding remarks	44
5.2	Suggestions for future research	45
6	References.....	46
6.1	Printed resources	46
6.2	Electronic resources	48

6.3	Interviews	49
7	Appendix.....	50
7.1	Interview guide for safety representatives	50
7.2	Interview guide for headmasters	51

1 Introduction

Despite legal institutions, policies, and provisions in place to ensure safe and healthy work environments, teachers in Sweden are faced with an alarming challenge of a deteriorating work environment due to high workload and a heavy administrative burden. A study on teacher's perceived work environment made by the Teacher's National Association (Lärarnas Riksförbund) in 2015, showed that six out of ten teachers are dissatisfied with their work situation. Two relevant causes of the dissatisfaction mentioned were high workload and inadequate resources (Lärarnas Riksförbund, 2015). Recent studies have also shown that teachers experience an increase in new work tasks, specifically documentation, without previous tasks being removed. As teachers' administrative workload is increasing, the effects can be seen through a negative development within their psychosocial work environment (Forssell & Ivarsson, 2019, p. 144). There is a large teacher shortage in Sweden (European Commission, 2019) and it has been estimated that there will be a shortage of 45 000 teachers by the year 2025 (Skolverket, 2019). Such reports point to it being increasingly important to investigate teachers' working conditions and the precautionary measures and policies that have been put in place to improve their work environment. They also warrant an examination of the degree to which existing legal frameworks succeed in countering such trends, or perhaps more importantly, why they fail.

Research examining the effects of governance on school organisation and practice provide some insight as to why teachers' psychosocial work environment is deteriorating. Schools in Sweden are inspected by governmental agencies on a national level, but are regulated by municipalities on a local level. The multiple actors involved in the regulation of schools, together with the different school reforms that have taken place in Sweden since the 1990s, have led to a complex model of regulation that naturally impacts schools and the people working in them (Forssell & Ivarsson, 2019, p. 137). The decentralisation of schools implemented in the 1990s led municipalities to take over the role of the employer, but it also led to a higher degree of observance from state agencies.

It has been argued that schools in Sweden are today impacted by a regime of control, as they are increasingly expected and obliged to evaluate and report to government agencies, with the objective of increasing efficiency and transparency (Andersson, 2006, p. 112). The heavy regulation has been argued to be one of the reasons behind teacher's high administrative burden as they constantly have to document and report to the state authorities, something that is impacting their organisational and social work environment (Forssell & Ivarsson, 2019, p. 156). Organisational and social work environment is connected to issues such as

workload, demands and resources of the job and victimisation at the workplace (SFS 2019:614).

As a consequence of these issues, policymakers have increasingly been pressured to work towards a reform of work environment policy. The key state agency tasked with ensuring safe and healthy work environments in schools is the Swedish Work Environment Authority (Arbetsmiljöverket), henceforth referred to as the SWEA. The main law regulating work environment is the Work Environment Act (WEA). The SWEA has the mandate from the Swedish government to ensure that laws on work environment, specifically the WEA, are being followed in every workplace. Their main objective is to reduce the risks of ill health and accidents in working life as well as to improve the work environment. This is done mainly through inspections, the creation of provisions, and, in some cases, deciding if workplaces should be issued an injunction or a ban (Arbetsmiljöverket, 2017).

While the SWEA plays a key role in working for a good work environment, ultimately, as the WEA stipulates, it is the foremost obligation of the employer at the workplace to ensure that the WEA is implemented. However, the employer is not the only actor at the workplace who should actively work in favor of the work environment. One way in which the implementation of the WEA is proactively ensured is through the selection of a so-called safety representative, or in Swedish, *skyddsombud*. At every workplace where more than five people are regularly employed, there must be one employee who is appointed safety representative. They may be active in a labor union, but this is not obligatory. Their main function is to represent the workers at the same time as they cooperate with the employer to ensure an adequate work environment (Steinberg, 2004, p. 317). The safety representative is not legally responsible for the work environment the same way the employer is, but is supposed to work together with and surveil the employer to make sure they follow their responsibility. The function of the safety representative is thus paramount to successful implementation of the WEA, since they are legally defined as key implementers and safeguards, and may call for a halt of operations if they deem the workplace to be unsafe (SFS 2019:614).

This study focuses on the two key actors mentioned above who are involved in implementing provisions in schools - safety representatives and employers, in this case specifically, the headmasters. The implementation process is thus studied both from the viewpoint of the safety representative, an actor who has a unique role in ensuring a good work environment, and from the viewpoint of headmasters, as they are legally responsible for the work environment in schools.

In order to narrow down the scope, the study focuses on the implementation of one provision, the provision on Organisational and social work environment, also known as provision 2015:4. The provision was created by the SWEA in 2015 and aims to "... promote a good work environment and prevent risks of ill health due to organisational and social conditions in the work environment." (SFS 2019:614, p. 5). The most crucial work environment issues that teachers face today, such as unhealthy workload and high demands, are regulated through this provision and it

is therefore relevant to see if, and how, the provision is being implemented in schools today.

The theoretical framework in this study comes from implementation theory, specifically theories on the study of policy intention and the role of street-level bureaucrats in the implementation process. Research on how street-level bureaucrats can implement provisions and policies usually highlight their work on the local level of implementation and includes analysing their coping strategies. Factors such as lack of resources, lack of cooperation between the actors involved, and the importance of street-level bureaucrats' discretion, have been brought up in previous research. Discretion in the case of street-level bureaucrats refers to their freedom of action, which can be an enabling factor for them in the implementation process (Lipsky, 2010). Additionally, the study places a specific focus on the barriers and opportunities safety representatives and headmasters encounter as they implement the provision. The study also analyses the provision itself with the help of the concept of policy intention.

1.1 Aims and research questions

The aim of this study is twofold. Firstly, the study aims to develop new knowledge on how safety representatives and headmasters implement the provision on Organisational and social work environment in schools. Secondly, the study aims to identify which opportunities as well as barriers that safety representatives and headmasters have encountered in the implementation of the provision. The research topic is narrowed down to the following research questions:

1. How have safety representatives and headmasters exercised discretion in the implementation of the provision?
2. What opportunities and barriers do safety representatives and headmasters encounter in the implementation of the provision?

To reach the aims and to be able to answer the research questions, the following objectives have been set. Firstly, the provision itself is examined in order to thoroughly grasp why it was created, the formal institutional setting of its creation, and its intention. This will serve as a background knowledge about the provision which can be helpful for understanding the implementation process.

Secondly, interviews with safety representatives and headmasters have been conducted in order to identify and examine how such actors interpret the (in)formal institutional setting (obligations, barriers, and opportunities) drawing on a semi-structured interviewing method. Whereas the provision states the importance of cooperation between employers and employees, the narrated experiences of safety representatives and headmasters may highlight conflict and self-reliance as a

hallmark of implementation, as well as the importance of exercising discretion and using coping strategies.

This study has the potential to yield insights on how a provision created on a national level can be implemented in schools, as well as to how work environment issues regarding something as complex as organisational and social work environment can be alleviated through the implementation of a provision. Since teachers' work environment needs to improve, research on how the work environment can be facilitated through the implementation of a provision is important for the future of inspections and policy implementation in general. Furthermore, the provision has only been in effect since 2016, meaning that there is still more research needed on the compliance of this provision in schools and the role that safety representatives and headmasters have in implementing it.

1.2 Disposition

The first chapter contains an introduction to the problem area and presents the research questions and aims of the study. Chapter two contains a review of implementation theory as well as the chosen theoretical framework in the study. The third chapter continues with the methodological considerations and a description of the methods that have been used. Chapter four contains an analysis of the gathered data and material, both documents and interviews. The study ends with a chapter containing concluding remarks and suggestions for future research.

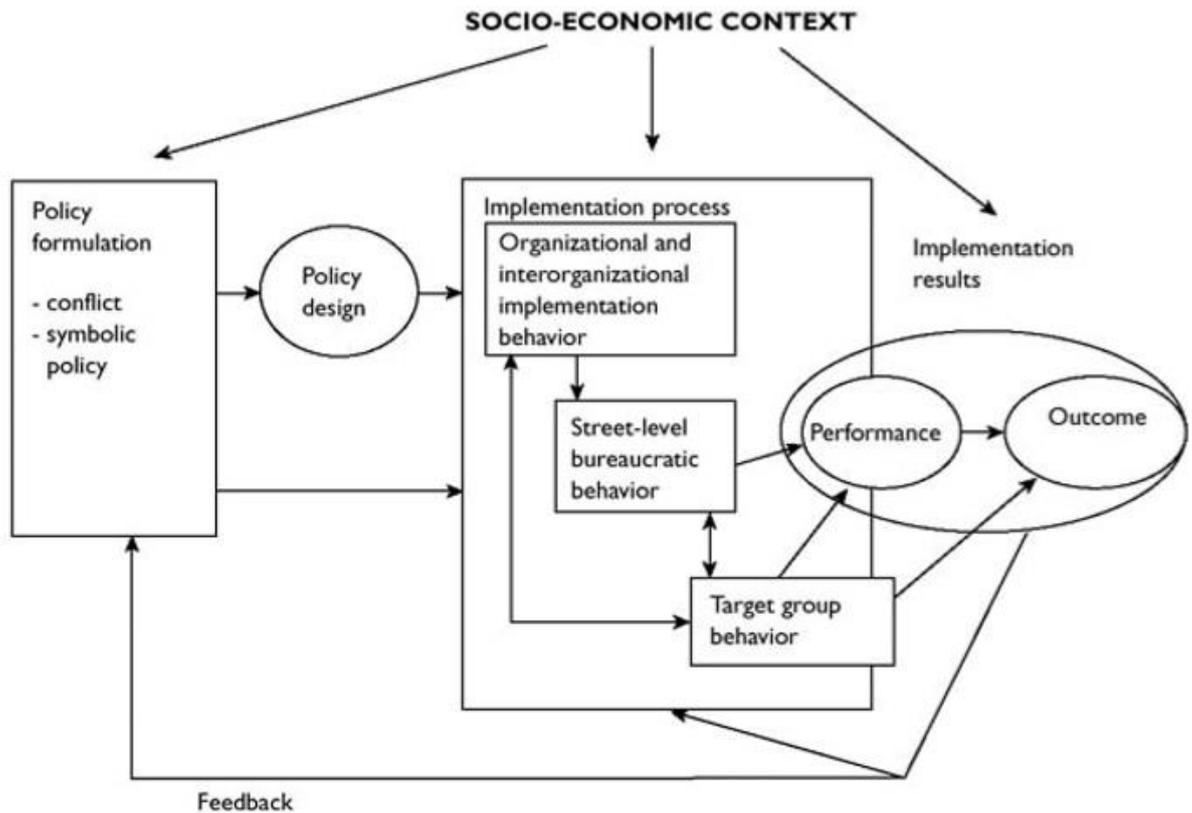
2 Theoretical framework

This study addresses the implementation of a provision in the area of work environment and it analyses both the intentions behind the provision and the barriers and opportunities perceived in the implementation of it. This chapter contains an overview of the literature on implementation, mainly conceptualized by Winter (2003) and by Sabatier (1986). The chapter also includes the theoretical framework for this study, mainly Lipsky's (1980) theory on street-level bureaucrats which will be used to analyse safety representatives' and headmasters' perceived barriers and opportunities in the implementation process as well as how they exercise discretion. The chapter ends with a section on policy intention, partly conceptualized by Wolman (1981) which will be used for understanding the intention behind the provision.

2.1 The study of implementation

The implementation of policies and provisions has been studied through many different perspectives and through the use of different research strategies and methodologies. The field first developed through evaluation research when researchers began to analyse the effects of policies as well as the relationship between policymaking and the actual implementation. Studying implementation is often done within policy areas such as social policy, educational policy, and environmental policy. Some reasons behind studying implementation has been to understand the effects of a policy, or to find out why implementation has succeeded or failed (Premfors, 1989, p. 123). Other reasons have been to analyse the content of a policy and to see if it correlates to how it has been implemented, as well as to analyse the causes and consequences of a policy (Winter, 2003b, p. 2).

While studying implementation, some researchers focus on the implementation process whereas some researchers focus on the implementation output. I will elaborate on these different variables with the help of a theoretical model, called the Integrated Implementation Model, which was presented by Winter in 1990. The model was created in an attempt to integrate some of the most important factors within implementation research into one theoretical model.



The Integrated Implementation Model (Winter, 2003a, p. 4).

The model begins with the policy formulation. The policy formulation can be connected to a conflict or a problem that policymakers want to solve, but it can also be a symbolic policy that does not have the intention to get to the root of the problem, but rather to symbolically show citizens that measures are being taken. The policy formulation is then followed by the policy design, which often contains goals and instruments for achieving them. Research on policy design has shown that goals can sometimes be ambiguous or not entirely clear in how they should be achieved, and that designing good policies can be a difficult process. It has also been found that the policy design affects implementers' incentives to carry out their tasks, through signaling the desired courses of action (May, 2003, p. 3).

Continuing, the policy formulation and the policy design lead to the implementation process. The implementation process includes the behaviours of street-level bureaucrats (which will be developed further below), the organisational and inter-organisational behaviours, and the behaviours of target groups. Target groups of public policies can be defined as citizens or firms having an important role not only on the effects of the policy itself, but also through affecting the behaviours of street-level bureaucrats. Combined, the behaviours of these three groups affect each other, as the arrows in the model show.

The implementation process then leads to the result of the implementation, which can be seen both through analysing performance and output. From the output

comes feedback which goes back to the actors in the implementation process and to the first stage policy formulation. Overarchingly, the socio-economic context of society or of the organisation itself also exists as a factor that impacts everything in the model (Winter, 2003a, p. 4-7).

Like any other theoretical model, it is important to note that the Integrated Implementation Model has its limitations. For example, the implementation process can be influenced by other factors than the ones mentioned in the model, and as one policy is being implemented, other policies might be implemented at the same time which means that there might be a multitude of policies being implemented simultaneously which naturally also affects the implementation process. In consideration of limitations like these, a critical distance towards the model is required as it can not be used to explain every factor in the implementation of policies. Nonetheless, since this model integrates some of the most central factors relevant to policy implementation processes, its utility still holds today and for the purposes of this study.

For this study, two concepts from the Integrated Implementation Model will be used in the analysis. The first concept is policy formulation, which will be connected to another related concept, the policy intention. The second is the implementation process, which is narrowed down to analysing street-level bureaucratic behaviour, in my case the safety representatives and headmasters. These concepts will be elaborated on in the coming sections, together with how they will be used. Before introducing these sections, an additional set of examples of how the implementation of policies can be studied is provided. The Integrated Implementation Model is one among many approaches through which policy implementation can be studied, but naturally there exist other approaches as well that are relevant to discuss.

Two other common approaches within implementation theory that also include the perspective of street-level bureaucrats are here briefly explained. These two approaches have been referred to as the top-down approach and the bottom-up approach. In some cases, they have also been combined into a synthesis (Sabatier 1986, p. 22). To start with the top-down approach, it usually focuses on a policy decision that is taken at the national level and the perspective lies on the decision-makers in charge of creating that policy. Within this approach, factors such as the policy design, policy formulation, and the policy process are often studied. The criterion of whether the implementation was deemed to be a failure or a success is claimed to be found within the attainment of the policy goals. Researchers using this approach may also analyse if the goals were ambiguous and whether there was a lack of information in the implementation phase (Hudson & Lowe, 2009, p. 256).

A common criticism towards the top-down approach is the excessive emphasis placed on decision-makers in charge of creating the policy and not on the actors implementing it on the local level. As the focus lies on the formulation of policy, the strategies of the actors working with it is not included, which might lead to a one-sided view of implementation.

The bottom-up approach on the other hand, studies the actors who interact at the operational level, which is oftentimes local actors. Here, the criterion of whether the implementation was successful or not has more to do with the local discretionary power (ibid, p, 260). The focus is moved away from policy formulation and is instead placed on the strategies of those working with implementation on a local level (Sabatier, 1986, p. 22). In fact, some researchers within this approach claim that policy is what happens in the moment of delivery by actors on the local level, meaning that how they act says all about what defines policy (Hudson & Lowe, 2009, p. 249).

Sabatier claims that the bottom-up approach can be relevant to use when researchers are interested in local contexts, or when a large number of actors are involved in the implementation process (1986, p. 36). One cause for failure of implementation within the bottom-up perspective can be the lack of resources or the non-participation of local actors (Hudson & Lowe, 2009, p. 256).

To analyse the bottom-up approach in implementation research, Sabatier gives the example of a study by Hjern et al., where the researchers began their study by identifying the network of actors involved in local areas of service delivery through asking them about their contacts. These contacts were then used as a way to identify which local, regional, and national actors were involved in the planning and execution of the programs. Conducting their study in this way meant that they could start from the bottom and work their way up. Sabatier claims that a limitation within these types of studies is that they rely heavily on the perceptions of actors. Considering the actor-oriented focus, they might neglect factors that indirectly affect their behaviour, or factors that the actors themselves do not notice (1986, p. 32-35). This is thus something to consider while conducting bottom-up research, as it can be a limitation within this approach.

In summary, there exists many concepts within implementation theory, and researchers can focus on different parts. Some focus on the policy formulation and policy design whereas some focus on the local level implementation, and some try to combine different factors in their research.

2.1.1 Street-level bureaucrats

“Policy implementation requires institutions to carry the burden of transforming general policy intent into an array of rules, routines and social processes that can convert policy intention into action. This process is the core of what is meant by implementation” (O’Toole, 2003, p. 2).

As mentioned before, the main part of the implementation process that is investigated in this study is the role of street-level bureaucrats, in this case safety representatives and headmasters. Much has been written about street-level bureaucrats, or front-line workers as they are also called, and Lipsky, a pioneer within this field of research, defines street-level bureaucrats as public service

workers who interact directly with citizens (1980, p. 3). Since they should ideally respond to the needs of the people they serve and because they work within the welfare sector, they are also referred to by him as “agents of social control” (ibid, p. 11-13). They implement policies created by the government and by doing so they have a crucial position in the policy implementation process. Their task is to apply the regulations in their field in a neutral and competent matter (Vedung, 2016, p. 89). According to Lipsky, schools are seen as street-level bureaucracies and teachers and headmasters are examples of street-level bureaucrats (1980, p. 43). However, headmasters and teachers naturally differ in how closely they work with citizens, but generally, lower level managers such as headmasters can be viewed as street-level bureaucrats because of their position (Lipsky, 2010, p. 242).

One of the distinct claims by Lipsky is that street-level bureaucrats can have a large amount of discretion in their decision-making, meaning that they are to an extent free to determine the nature and quality of the benefits they provide (2010, p. 11). Through their discretion, they might come up with informal rules and their own procedures (Hudson & Lowe, 2009, p. 250). With respect to their discretion, they are seen as a particular type of policymakers, and there can be difficulties in directing and controlling them. It has also been claimed that the discretion both enables and constrains them in their work (Johansson, 2012, p. 1034). Teachers are an example of street-level bureaucrats who generally have a large level of autonomy in their work (Vedung, 2016, p. 91). However, as is the case in Sweden, the need for documentation to state agencies has increased, meaning that even though teachers have autonomy in teaching, they still have to increasingly report back to regulatory agencies and document their work. Street-level bureaucrats thus have much discretion, but are nonetheless still restrained by rules and regulations, as well as by norms in their organisations (Lipsky, 1980, p. 13-14). Lipsky writes that “... every extension of service benefits is accompanied by an extension of state influence and control” (ibid, p. 4), meaning that even though workers in the welfare sector may have discretion in carrying out their tasks, they are still under the influence of state agencies. As previously mentioned in the introduction, state influence and control impacting worker autonomy has been identified in the case of Swedish schools as well.

Public policies are thus much affected by the decisions and routines of street-level bureaucrats, but it is important to note that the work of street-level bureaucrats is somewhat paradoxical. On the one hand, their work is strictly ruled by trying to achieve policy objectives, but on the other hand the individual cases in their work require freedom in decision-making. This paradox is also viewed in Lipsky’s wording of the term – as “bureaucracy” is something guided by rules and structures, whereas “street-level” is something that is located far away from the central decision-making body. Lipsky also argues that the strategies by street-level bureaucrats effectively *becomes* the policies they carry out (2010, p. 12-13). They may “make” policy, meaning that their discretionary behaviour leads to implementation, however this only happens in the context of the policy structures that their decisions are part of (ibid, p. 221).

Another distinct claim made by Lipsky is that street-level bureaucrats manage their difficult jobs by developing certain routines of practice (ibid, xi-xii). The research on the implementation of provisions by street-level bureaucrats therefore has a tendency to focus on their coping strategies and on how they implement policies. For example, Svensson (2019) used the theory of street-level bureaucrats in a study on teachers of asylum-seeking pupils in Sweden, in order to understand the teachers' experience and coping strategies. She found, through interviews, that the goals of educational policy and immigration policy were conflicting, and so, teachers developed strategies to deal with the conflicting goals because they were affecting their teaching. Some factors were identified, such as a lack of training and insufficient support within the educational system that constrained the teachers' work. Street-level bureaucrats can have an inherent ambiguity in their work as they on the one hand are trying to meet the needs of the clients and on the other hand try to follow rules and regulations, which was the case for teachers who dealt with clients (in this case, pupils) and had to make decisions with limited resources (2019, p. 3). The teachers in the study had to act based on their practical knowledge and sometimes through informal procedures, which street-level bureaucrats tend to do when they come up with strategies to cope with unpredictability in their work tasks. They also perceived their managers, the headmasters, to be diminishing their work and sideline them, and that what they did was not given enough validation and support from them (ibid, p. 10-11).

Furthermore, something else to consider is that street-level bureaucrats are not a homogeneous group as they work in differing environments. Research has also shown that they can have different levels of education and different work tasks. The concept of street-level bureaucrats has mostly been used for investigating those who work directly with clients and has been focused on their strategies and behaviours in regards to delivering social welfare and often highlights the implementation of policies targeted to citizens. Some of them make decisions that directly influence people's daily life (Johansson, 2012, p. 1032-1035). What they have in common, however, is that they implement policies and provisions by exercising discretion and develop their own strategies while doing so.

2.1.2 Context matters

This section continues with the literature on implementation made by local-level actors, and focuses on the importance of the context around the implementation. Two pioneers worth mentioning are Jeffrey Pressman and Aaron Wildavsky, who conducted a case study on the local implementation of a federal economic development program in the United States. In their study, they focused on the 'complexity of joint action' as the key implementation problem and identified that there were many different actors involved in the policy implementation, such as government actors on a national, regional and local level as well as courts, affected

interest groups, private firms, and the media. These numerous actors had different priorities which would lead to disagreements. On the other hand, in cases where the actors did agree on a certain proposal, they found that they still could not implement it because of a lack of resources (Pressman & Wildavsky, 1984, p. 98-101).

In summary, the problems that were found were tied to the many actors involved, the many different decisions that were taken during the implementation process, and to a lack of resources. The different perspectives and priorities by the actors caused delays and failures in the implementation of the policy (Winter, 2003b, p. 2). Pressman and Wildavsky's study led to a debate about which conditions are necessary for successful policy implementation. Some factors that they deemed necessary were having access to adequate funding as well as establishing clear lines of communication and effective management (Hudson & Lowe, 2009, p. 246).

Actors within the implementation process are naturally impacted by the context they function in and this can therefore be important to consider while analysing. The implementation context can contain factors such as the capacity of the organisation to carry out implementation. The capacity of the organisation can be determined by time or budgetary constraints, available competence, or ability to navigate legal frameworks and bureaucratic hierarchies and procedures. It has been claimed that street-level bureaucrats are largely influenced by the implementation context when they take decisions within regulatory policies. Thus, the context around the policy plays an important role, especially when the focus in research is on the people who implement them in the field (Meyers & Vorsanger, 2003, p. 2).

Winters have concluded some interactions that are relevant for investigating implementation – the interaction between front-line workers, the organisational networks and the target group of the policy. These interactions are then imbedded in a larger political and socio-economic context that needs to be considered as well, as aforementioned in the Integrated Implementation Model (ibid, p. 2). When street-level bureaucrats have difficult choices to make and none of the available alternatives provides a suitable solution, it can be the case that the problem is connected to broader structures in society (Svensson, 2019, p. 12).

2.1.3 Barriers and opportunities for implementation

It has been stated that practically all research on implementation has its point of departure in a problematization of the carrying out phase of implementation (Premfors, 1989, p. 122). However, this study does not assume that there has to be an existing problem in the implementation process of the provision and the study rather wants to show some of the barriers and opportunities within the implementation process. To identify and analyse the barriers and opportunities that safety representatives and headmasters view, different factors from Lipsky's theory on street-level bureaucrats will be used in the analysis of this study.

Starting with barriers, one problem that street-level bureaucrats can be faced with is a lack of resources. Examples of a lack of resources that have been found in previous research have been a lack of personnel, a lack of technical resources, or a lack of time to implement the policies. A specific lack of resources that Lipsky mentions for street-level bureaucrats in schools is a lack of supplies and overcrowded classrooms. Another example is personal resources, which is defined as the knowledge and experience of the workers. Street-level bureaucrats lacking in training and experience might struggle more to implement policies and interact with clients (1980, p. 29-31). The lack of resources affects street-level bureaucrats in a way so that they are not able to perform in the highest standard (Lipsky, 2010, p. 11).

Another barrier for implementation can be difficulties in cooperation between employers and employees. This can be caused by differing priorities, which in the worst-case scenario can lead to employers placing obstacles for employees to implement the provision, or vice versa. Different goals can also lead to difficulties in cooperation which can be caused partly by street-level bureaucrats' discretion, and together with inadequate resources, it might mean that they have to develop certain shortcuts. It can be the case that the coping strategies developed by street-level bureaucrats are not sanctioned by their managers and that managers try to restrict their discretion. These efforts might be seen as illegitimate by the street-level bureaucrats, leading them to resist them (ibid, p. 17-19).

This means that if the employer and employees on the other hand would share the same priorities and are able to successfully cooperate in the matters that they both prioritize, it would be an opportunity for implementation.

As aforementioned, street-level bureaucrats can develop certain coping strategies in order to facilitate the implementation, and these strategies can thus be viewed as opportunities. This is tied together with their discretion as it may enable them to carry out their tasks and to maintain a certain degree of control over their work (ibid, 2010 p. 190).

It is of course difficult to measure implementation success and this study does not attempt to analyse whether the implementation was a success or a failure, but rather to point out what safety representatives and headmasters view as being opportunities and barriers for implementation.

2.1.4 Policy intention

“The separation of policy design from implementation is fatal” (Pressman & Wildavsky, 1984, p. 164).

The above quote shows a way of thinking about implementation analysis, which takes for granted that policy design and factors in the implementation process are dependent on each other and that they should therefore be analysed together. My stance is not that these two can not be separated, however it is important to consider

that the implementation of a policy is always targeted against a goal that comes from the policy design. The policy design and policy intention are therefore connected to the implementation process.

As aforementioned, studying the attainment of the goals of the policy is often part of the top-down perspective in implementation research (Hudson & Lowe, 2009, p. 256). By analysing both the intention of the policy and the opinions of street-level bureaucrats, this study combines perspectives used both in the top-down approach and the bottom-up approach.

A policy or a provision usually contains a mixture of recommendations, goals and means for accomplishing them, and sometimes also an allocation of resources for the required tasks and measures. They always, in one way or another, contain an announcement of a course of action and the intentions can usually be viewed in the language that has been used to communicate (May, 2003, p. 2).

There are also different scopes within a policy that address the scale of the problem and the means. It can for example be a geographical scale, if it is a national policy or only targeted for a certain region. Or, it can be a policy that is targeted only to specific groups. Furthermore, the policy can also be completely new or an adaption of an already existing policy. These different scopes naturally affect the implementation differently. Some scholars have argued that a more contained policy is easier to implement, but on the other hand, the impacts from a more contained policy can be more limited since not as many people will be affected by it (ibid, p. 8-9).

Something else to consider is that the intentions of the policy might differ from how the policy is perceived in practice, because of certain distortions that take place during the implementation process. While studying the policy design, one can look at whether these distortions have been addressed and whether or not they were anticipated. Some scholars claim that during the implementation process, it can be desirable to modify the policy in order for it to reflect the current situation, whereas other scholars claim that not much can be done to address the distortions because of inevitable ambiguity in the policy and conflicts between implementers (ibid, p. 2). Tying this together with the theory on street-level bureaucrats by Lipsky, he claimed that the strategies by street-level bureaucrats eventually becomes the policy they carry out (2010, p. 12-13). This can mean that not every part of the intention from the policy might be carried out, and that it can not be possible to predict how the policy will be implemented in the formulation phase of the policy, because it inevitably has to do with how street-level bureaucrats implement it, and the opportunities and barriers they face while implementing it.

The policy, or provision, usually contains a problem of some sort. A policy problem can be defined as a state of dissatisfaction that the public sector wants to change (Premfors, 1989, p. 48). Wolman is one author who has written about the conceptualization of the policy problem and he states that the way the problem is conceptualized will affect the nature and design of the policy. An inadequate problem conceptualization can lead to failure in the implementation stage. Wolman continues by stating that oftentimes policy agendas reflect political demands, but

might not contain an evaluation of what is actually needed to solve the problem. The problem might have been thoroughly discussed by politicians, but it does not mean that the policy is always thought-through. However, Wolman also points to the fact that not all problems are possible to fully conceptualize and to solve, since they can be an expression of dissatisfaction towards something without empirical phenomena backing it up. A common solution that is satisfactory to all may also not be possible to achieve since the definition of the problem might be subjective, thus perhaps differing between groups (1981, p. 436-437).

For the analysis of the provision on Organisational and social work environment, the following factors will be looked at – the provision's purpose, intention, what is new about it compared to previous provisions, and what led up to its creation. This focus has been chosen because knowing the context in which it was created and knowing its purpose, is seen to lead to more insight about the implementation process.

3 Methodology

Single case analysis has often dominated the field of implementation analysis as it has allowed for it to be studied in detail, which is suitable for a complex phenomenon such as the implementation of provisions and policies. Different types of data can be used within implementation research, for example qualitative methods where documents and reports are investigated, or surveys and interviews conducted with implementers. Quantitative methods have also been used in some cases to collect large numbers of data, mostly data on the output from the implementation (Winter, 2003a, p. 3). Implementation research thus typically employs either, or both, qualitative and quantitative methods and is therefore not restricted to any specific type of source material. This open-endedness both requires as much as it enables and encourages the scholar to clearly identify those theories and methods that best help to carry out the research. Therefore, after careful consideration, this study – drawing on documents and transcribed interviews without intention to generalize findings but rather to uncover descriptions of experiences – follows a qualitative research design.

This chapter contains a depiction of the chosen methods for the study and the considerations behind them. It begins with a description of the study's epistemological and ontological positioning and continues with the research focus and delimitations of the study. The chapter then continues with sections on the research design and sections on data collection, data analysis and ethical considerations.

3.1 Ontological and epistemological positioning

Scientific methods can be influenced by different epistemological and ontological positions (Bryman, 2018, p. 746). The underlying assumptions in this study are rooted in a constructivist way of seeing the world. Constructivism questions the objective reality and sees social phenomenon as being in a state of constant change because of the influence of people's interactions. Within the constructivist approach, the description of reality is made out of constructions and the version of reality that is being presented can therefore not be seen as definitive (ibid, p. 58). With that being said, observations from the world can still be made within this way of thinking, but it should be noted that social constructs are what lies behind people's actions. Social constructs can be factors such as norms, ideas, beliefs or any other filter that people see the world through (Parsons, 2010, p. 80). This

positioning is underlying in the analysis of safety representatives' and headmasters' perceptions of opportunities and barriers for implementation of the provision, meaning that it does not recognize their perceptions as objective truths. They are instead contextually contingent or specific truths, and represent subjective framings of barriers and opportunities in the implementation process.

In summary, this study adheres to a research paradigm that recognizes reality as a subjective and contextual experience. Key to understanding implementation processes and its opportunities and barriers, is thus perhaps best reached by exploring the experiences and perceptions of bureaucrats operating in the context in question.

3.2 Research focus and delimitations

This study is delimited to solely investigate the implementation of one provision, the provision on Organisational and social work environment. As mentioned in the introductory chapter of this study, this provision has been selected since the most alarming work environment problems that teachers face today, such as high workload and demands, are regulated through this provision. The provision has been in effect for four years, which makes it rather new and also adds to why it is relevant to study. The literature on work environment in schools can be helped by including more data on the implementation of provisions, which is another reason for why this research focus has been chosen.

Continuing with the research focus and delimitations, the study focuses on safety representatives and headmasters as they are the key actors within the implementation process of the provision on work environment in schools. The safety representatives have a unique role and a crucial part in the implementation process as they are street-level bureaucrats with specific judicial rights. These reasons, together with the fact that they also work as teachers, is why they have been chosen. Headmasters were chosen as interview subjects because as employers, they have the legal responsibility for work environment in schools and therefore also play an important part in the implementation process.

Because this study is about teachers' work environment, one could think that teachers who are not safety representatives could also have been chosen as interview subjects. However, to include a third actor would have broadened the scope much more, which was not desirable in this case. Presenting opportunities and barriers from safety representatives and headmasters, is more than sufficient for the aim of this study. Additionally, teachers' opinions are usually included in the implementation of work environment provisions through the use of surveys and through meetings with the employer, which makes them a part of the implementation process as well.

Moreover, the study is delimited to investigate barriers and opportunities that safety representatives and headmasters have experienced in the implementation process because this is thought to provide an understanding of what factors have helped or have been challenges for them. To understand this can contribute to the study of the implementation of provisions in schools.

Another delimitation chosen in this study is that all schools included are regulated through municipalities and are therefore not private. Only municipal schools were chosen in order to obtain as little difference between the schools as possible.

3.3 Research design

This study uses two types of data, primarily interviews but also written sources in the form of documents from the Swedish government and the SWEA. By combining different data, more knowledge can be produced (Small, 2013, p. 64-65). The use of multiple data or methods can be a strategic way to fill in gaps, as one type of data can compensate for what the other type lacks, and add more information. The analysis made from the documents helps in the general analysis of the provision, but is also a complement to better understand the interviews as the documents provide additional information about the provision. The methods chosen are therefore deemed to be the best suited to answer the research questions as they will help bring the information needed.

In the following sections, the two different methods and the considerations behind them will be elaborated on.

3.3.1 Interviews

Conducting qualitative interviews as a research method has the advantage of placing emphasis on the interview subject's own views and opinions. This method therefore suits the aim and purpose of this study and has been chosen to answer the research questions. The interviews conducted in this study were semi-structured, meaning that questions had been prepared beforehand and that follow-up questions were posed in the moment, depending on the answers given. When there is a specific aim behind conducting interviews, as in my case, a semi-structured type of interview with questions prepared beforehand is suitable (Bryman, 2018, p. 564). Open questions were also posed in order to let the interview subject weigh in on what is relevant and important to bring up (ibid, p. 561). Interview guides with questions were made, one for safety representatives and one for headmasters as it was deemed necessary to adjust the questions to the different actors because of their different roles and judicial rights (see Appendix). The interview guides were also made in order to make sure that all interview subjects were asked the same

questions, in order to increase the validity of the study. Transcripts of all interviews were made and have been used in the data analysis.

Continuing with the considerations behind choosing interview subjects, eight interviews were conducted, four with safety representatives and four with headmasters. Two of the headmasters and one of the safety representatives work in high schools, but the rest of the interview subjects work in secondary schools (grades six or seven until nine). Both high schools and secondary schools were included in the study, since the relevance was deemed not to lie in which level the safety representatives or headmasters work, but rather in the fact that they all have had experience on working with the implementation of the provision.

Out of the eight interview subjects, four were women (three headmasters and one safety representative) and four were men (one headmaster and three safety representatives). The interview subjects worked in four different municipalities in Sweden, but because of accessibility purposes the majority of them (five out of eight) work in my own locality, i.e. Lund municipality. All interviews were conducted in Swedish and quotes have been translated by myself to English. While translating, there is a risk that some nuances in the language can be lost. This has been considered for this study as well, but no such serious instances have been noted.

Because safety representatives and headmasters have common features – as street-level bureaucrats normally have – it was deemed that whether they work in a high school or a secondary school is not a defining factor and therefore both types of schools have been included. The same reasoning goes for choosing interview subjects who work in different municipalities. However, it should be noted that different municipalities can have different economic contexts, which can impact the incentives behind implementing the provision on Organisational and social work environment.

Additionally, two of the safety representatives interviewed are head safety representatives in their union which means that they have experience in handling cases on a municipal level and not only on the level of the specific school. The two types of safety representatives were deemed not to have a big impact on the results, as what is more relevant is that they have all worked with implementing the provision.

Furthermore, as has been previously mentioned, the aim of this study is not to compare cases or to generalize about the implementation process. Therefore, the number of interviews conducted is deemed to be coherent with the focus and research questions of this study. The opinions of these eight interview subjects may be limited, but in this context they are still the most valuable.

To continue with the analysis of the interviews, the focus while analysing the transcripts was both to understand the meaning in what has been said and to find themes connected to the research questions (Kvale, 2007, p. 104). Within thematic representation, relevant findings can be the perspectives of the participants, for example participants' perspectives on benefits or limitations of a certain phenomena (Roulston, 2013, p. 150-151). The themes are presented in the analysis

and have to do with the language used in the provision, the legal prerogatives of the actors and the relationship between them, as well as their level of discretion and how it has been shown in the implementation. These themes are all connected to opportunities and barriers in the implementation process.

When conducting research, it is important to reflect on the authenticity of the data, particularly with data coming from interviews and to be aware that interview subjects can naturally be influenced by many factors as they respond (Teorell & Svensson, 2007, p. 106). For example, when it comes to the headmasters, one can assume that they would not want to talk negatively about the work environment in an interview which they know will be used for research, as it might reflect poorly on them as employers. Factors like these have therefore been considered in the analysis of the interviews.

3.3.2 Sampling methods

When it came to finding interview subjects, I used two different sampling strategies. Firstly, I used purposive sampling, as I sent out emails to headmasters of all municipal high schools and secondary schools and to safety representatives in teachers' unions in Lund. I then used snowball sampling, which is when interview subjects refer the researcher to other informants in order to access new participants (Noy, 2008, p. 330). I asked the first safety representative I interviewed if he could lead me to other safety representatives whom he thought might be interested in participating in the study. That led him to post a message from me in a private group on Facebook, a group for head safety representatives active in his union in all parts of Sweden. Through this message, I was contacted by two safety representatives who I probably would not have been in contact with otherwise, as they work in other municipalities.

One obstacle I encountered in the process of finding interview subjects, was that the majority of the headmasters I sent out emails to did not want to participate, most of them blaming it on a lack of time. In the end, I found that the four headmasters I interviewed saw work environment as an important issue. They also took their obligation of being responsible of work environment rather seriously, leading to a certain bias in the results. The results of the study can not show how headmasters everywhere reason about work environment issues and about the implementation of the provision. However, as previously mentioned, the aim is not to generalize but rather to show their perceptions and reasoning. The same goes for safety representatives, that the results should not be seen as an objective truth.

3.3.3 Ethical considerations

As a researcher, it is important to reflect on implications of the study that may arise from my own biases and values (Bryman, 2012, p. 393). In order to reach this sort of reflexivity, I was careful to stay objective while interviewing and while analysing the transcripts by not adding my own opinions. Furthermore, all interview subjects gave me the permission to record the interviews and to use them in the study. For the purpose of anonymity, the names of the interview subjects have been changed in the analysis chapter where I present the data, and names of schools and unions are not mentioned either. This decision was made after having considered that the interview subjects might bring up sensitive matters.

3.3.4 Complementary method

The study contains an analysis of the intention of the provision, by looking at the context in which it was created as well as its content and purpose. The data that has been used for the analysis of the intention of the provision has been the provision itself, publications from the SWEA (legal documents), and publications from the Swedish government. These have all been gathered from their websites. The publications by the Swedish government have been used as a way to understand how and why the provision was created, and the publications from the SWEA help bring clarity to the provision and what it was intended to be used for.

Documents from a case by the SWEA has also been used as complementary data, since one safety representative mentioned this specific case during his interview as an example of how the provision was implemented. Because of that, it was deemed relevant to refer to the documents used in the case in order to add relevant information.

4 Analysis

This chapter contains an analysis of the gathered material of this study and begins with an analysis of the provision on Organisational and social work environment. By using the concept of policy intention, I investigate the purpose of the provision as well as what led up to its creation. Therefore, the analysis starts with a brief historical overview of decisions that were made up until the provision was created, both from the SWEA and the Swedish government. This is done to provide sufficient background information about the provision, a necessary precedent to bear in mind as the interviews are examined.

Thereafter, the chapter continues with an analysis of the interviews conducted with safety representatives and headmasters. The focus lies on opportunities and barriers for implementation of the provision, as well as the actors' different judiciary roles, how they have perceived the provision and how they have exercised discretion in the implementation process.

4.1 The intention and content of the provision

This section starts with a brief summary of some of the measures taken by the SWEA and the Swedish government that led up to the creation of the provision on Organisational and social work environment. In 1991, a revision was made in the WEA which introduced a requirement for employers to include so called Systematic work environment management at the workplace. This revision was made in order to improve the assessment and prevention of psychosocial risks at the workplace. At the time, there was a lack of provisions that could help specify what kind of measures employers were required to take in order to regulate the psychosocial work environment. However, with the provision on Systematic work environment management that was created, employers were meant to regularly (hence, the word 'systematic') assess factors such as levels of stress and other risks connected to ill-health and accidents (Bruhn & Frick, 2010, p. 576-577). The provision was adopted in 2001. Systematic work environment management is, in the words of the SWEA, "... the work done by the employer to investigate, carry out and follow up activities in such a way that ill-health and accidents at work are prevented and a satisfactory working environment achieved." (AFS 2001:1, p. 5). The provision is thus not limited to regulate solely psychosocial risks, but to all sorts of health-related matters in the workplace.

Between 2001 and 2003, the SWEA worked in a project where they tried to develop better methods to inspect psychosocial risk factors at workplaces. The aim of the project was both to set a standard for method development, and to see which methods inspectors could use in order to effectively inspect health risks connected to psychosocial work environment (Bruhn & Frick, 2010, p. 575).

Psychosocial work environment started to become an important issue that was increasingly discussed by politicians in Sweden. In the spring budget of 2015, it was proposed that the SWEA should receive an increase of 20 million SEK compared to previously. The Swedish government also deemed it necessary to come up with a new work environment strategy and developed a strategy that was set out to be in force between the years 2016-2020. This new strategy included psychosocial work environment as one of the top priorities (Regeringen, 2016). The motivations behind these efforts were an increase in the level of sick leave and work-related illnesses (Regeringen, 2015). The question of good psychosocial work environment was thereby becoming prioritized. The provision on Organisational and social work environment was created during this time period, it was adopted in September 2015 and entered into force in March 2016. The director of the department of rules at the SWEA claimed that clearer rules and demands were sought after because of the increase in unhealthy workload, conflicts and abusive manners at the workplace, and that is why the provision was created (Gunnarsson et al, 2016, p. 3).

These events give us insight into what led up to the creation of the provision and one of the main things they show is that organisational and social work environment became a priority for politicians, as pressures to reform were increasingly intensifying.

Furthermore, the provision is binding and contains recommendations and general advice on systematic work environment management, workload, working hours and victimisation at the workplace. The underlying thought is that physical, organisational and social factors are all interlaced for creating a good working environment (Gunnarsson et al, 2016, p. 8). The SWEA has written that they expect these rules will help decrease the risk of people becoming ill because of unhealthy workload or because of victimisation at the workplace. They also expect the rules to be a support for workers to be able to, to a higher extent, talk about organisational and social work environment issues at the workplace (Arbetsmiljöverket, 2019).

To discuss what is new about the provision, it can be stated that it is unique as it focuses on organisational and social work environment and therefore gives specific space to the question of psychosocial work environment, which previous provisions and policies had not done. Before the provision was created, it was the provision on Systematic work environment management that was mainly used to regulate good work environment (Gunnarsson et al, 2016, p. 3). Thus, what is new about the provision is that it focuses on matters such as unhealthy workload and demands of the job and is supposed to be used by employers as a tool to regulate these matters. This focus on organisational and social work environment, rather than on the physical work environment, was brought up by one headmaster who

was interviewed. She was positive about the provision and saw the need for it especially in schools.

“... it is a welcome provision because I think the Work Environment Act is a relatively old law and has been very much about the physical work environment. It is of course also important, but especially we who work in a contact-tight organisation find that many of our work environment issues are about the psychosocial.” (interview with Elin).

As aforementioned, the provision contains recommendations for how to cope with unhealthy workload. One way to reduce unhealthy workload, is to create priority lists for workers so they do not become overwhelmed with tasks and so that they know in which order they should be conducted. Furthermore, the employer should see to it that demands in the work tasks are in balance with the resources, meaning that the order of priorities can change and that the tasks can be varied or reduced (Koch, 2016). Employers should also see to it that tasks assigned to the employees do not give rise to unhealthy workloads (AFS 2015:4, p. 9). Priority lists are something that has been used in schools in order to facilitate the workload, and will be further elaborated on in the following sections on how the provision has been implemented.

Knowing why and during what context the provision was created, it can be stated that the intention behind the provision was to help alleviate problems with psychosocial work environment. However, can this intention be fulfilled and to what extent? It is important to note that other structures in society can impact the work environment and levels of stress, which is something that was brought up by a safety representative when we spoke about stress.

“It is still the case in this line of work, that more women wind up having rehab cases [than men]. (...) When women come home from work, they come home to the next job – they are supposed to take care of the household as well. It [stress] is both related to the workplace, but also to domestic violence. That is not something employers can be held accountable for.” (interview with Mattias).

The provision should perhaps not be seen as something that removes the problem entirely, partly because it is still up to the employer (and the employees) to implement it and partly because of other structures in society that the provision does not regulate. As was seen in the Integrated Implementation Model, context matters, and so the study of policies is still limited to the fact that structures in society have an impact.

The SWEA has themselves written on their webpage about the problem that can arise from creating general provisions and regulations for all kinds of workplaces, because different workplaces naturally have different needs. Especially stress-related problems can be challenging to regulate, as workplaces have different pre-existing conditions for coping with stress. Because of this variation amongst different workplaces, the provision does not regulate the employer in a detailed

matter, it is rather to be seen as a support that pinpoints which factors are important to work with. Then, it is up to the employer to investigate, make a risk assessment and evaluate (Arbetsmiljöverket, 2019). This can mean that whether or not the intention of the provision will be fulfilled, is up to the actions and discretion of the employer, something that the SWEA has indeed thought of while creating the provision. However, not only the employer, but the employees too have a responsibility to follow the provisions which are binding at the workplace (Arbetsmiljöverket, 2019). This means that the context and the degree of discretion decide to what extent the provision is implemented, something that will be further elaborated on in the following sections.

In summary, the provision on Organisational and social work environment was created after the question of psychosocial work environment had become a priority for the Swedish government. The provision mainly contains writings on workload, demands and resources for the job and victimisation at the workplace. The intention was to help employers improve the psychosocial work environment at their workplace. It is important to remember that, even though the policy design can be clear, contextual circumstances still matter for the implementation process.

In the following sections, Lipsky's street-level bureaucracy theory is applied to guide an examination of interviews with safety representatives and headmasters. Employing Lipsky's concept of discretion, safety representatives and headmasters – here seen as street-level bureaucrats – perceived barriers and opportunities are highlighted and examined section by section to illuminate how they have worked to implement the provision on organisational and social work environment.

4.2 Implementation of the provision

Drawing on Lipsky's street-level bureaucracy approach, in the coming sections the interviews conducted with safety representatives and headmasters charged with the implementation of the provision on organisational and social work environment, are examined. In the following, discretion is the key operative term from which informants' perceived opportunities and barriers to implementation are identified and analysed. Each section follows a specific theme that emerged from the data and that was highlighted by the informants. It should be noted that all informants – irrespective of whether they are safety representatives or headmasters – framed the provision as something positive in the sense that it was a necessary, helpful and important provision to implement. They did, however, have different views on how implementation should be done. The following analysis of the interviews yield great insights as to how individual bureaucrat discretion influences policy implementation and to their different strategies in implementing.

Before presenting the interview subjects' answers, I will briefly summarize the judiciary role the headmaster has when it comes to implementing provisions on

work environment at schools, as this can serve as an important background for understanding their answers. As has been mentioned, the headmaster is the employer and is as such legally responsible for the work environment. As stated in the WEA, the employer has to take all necessary measures to prevent the employee from being exposed to illness or accidents. To do so, they might change or replace factors that can lead to illness or to an accident, in order to eliminate the risks. Their obligations therefore include systematically planning, directing and monitoring activities in a manner that ensures the prescribed requirements for a good work environment. They should also investigate work-related injuries and the risks involved in the activities, and document the work environment and measures adopted with respect to it (SFS 2019:614).

4.2.1 The language and clarity of the provision

Nearly all interview subjects brought up the clarity of the provision as a facilitator within their implementation process, and so this section contains a summary and an analysis on their thoughts about the language and the clarity of the provision.

When asked if he sees any particular difference between before and after the provision was created, one safety representative brought up the language of the provision as a defining factor, specifically the use of the words “resources” and “demands”.

“It [the provision] has impacted our language, in how we discuss workload. I am thinking of "balance between demands and resources". It is precisely these expressions that have come to light and I think this has been good, because they have put other words on what we formerly used to only call "stress".” (interview with Karl).

Karl implied that with the use of the words “balance between demands and resources”, a new way of thinking arrived. He gave an example of how this new way of thinking would present itself in practice, during times when financial cutbacks had to be made. During those circumstances, Karl would use the wording from the provision in discussions with the employer. Because the cutbacks would lead to a decrease in resources, Karl could state to the employer that some of the demands should also be removed since the provision states that there should be a balance between demands and resources. He claimed that after the creation of the provision, he has been able to discuss with the employer about what requirements to remove, at times when financial cutbacks have to be made. In those situations, Karl claimed that they have been able to sit down together and decide on what they can remove.

“We did not have this way of thinking about savings before. (...) So I think that has been the biggest gain for me from the provision.” (interview with Karl).

The wording from the provision is thus seen as a support for this safety representative in his discussions with the employer, a support that he could use in practice. Policies and provisions can impact the context by structuring relationships and actions and may also provide openings for change. As Karl's reflections indicate, the provision has provided a new lingual or rhetorical resource from which to streamline the implementation process. Drawing on the opportunity presented in the new language of "balancing resources and demands", Karl develops a new routine of practice with the positive outcome of being able to negotiate that budget cuts should be joined by cuts on demands.

As Karl also mentioned, the language used in the provision led to a new way of understanding and talking about stress, something that was mentioned by one of the headmasters as well. When asked if there is any particular difference in how they work with work environment issues before and after the provision was implemented, the headmaster Alexandra replied:

"... a difference I think about is that it became more evident to talk about stress. Both on an individual level, but we also talk about it on a group level. (...) the provision probably made us start talking about it more systematically."

Thus, through implementing the provision, an incentive to talk about stress more appeared. Street-level bureaucrats, even though they have individually different discretion have in this case been able to identify and adopt "understanding and talking about stress" as a part of their implementation.

"... when the provision came (...) I felt well, this is a great tool to actually talk about "what is it that creates stress?". Because that is where you see signs of what a bad working environment is, and in our world it is the psychosocial environment. Since we do not work with dangerous tools, it is not the physical things that are barriers for us, it is rather the psychosocial work environment." (interview with Alexandra).

Because the provision regulates psychosocial work environment, something that this headmaster sees as relevant, it might increase the will to implement it. It might have been the case before the provision existed that there was no adequate language to describe negative psychosocial work environment. Alexandra also mentioned that the wording "social work environment" was something that had worried her when she first read the provision, specifically the fact that she was going to be responsible for her employee's social work environment.

"At first I felt a little worried, I felt "shit!". It feels like you get extra weight placed on you".

The wordings and formulations of the provision thus had an impact on how the safety representatives and the headmasters could work with achieving a balance between demands and resources. The wordings and formulations also impacted on

how frequently they talked about stress. The term “social work environment” was something that was a source of worry for one headmaster because of the added responsibility. This worry can be seen as a barrier for implementation that may yield less desirable outcomes in the implementation process. However, the worry seemed to decrease over time in Alexandra’s case, which can indicate that she managed to develop certain routines of practice to cope with it.

Additionally, the content and clarity of the provision was brought up by many as something that facilitated the implementation. One safety representative, Lena, mentioned the provision’s many writings on work environment and workload as something they greatly benefitted from at her school while using the provision. She also claimed that the regulation brings up matters that are relevant for teacher’s work environment, and added:

“There are direct quotes which I have used from [the provision] which state "the employer must do this, this and this". These [quotes] are something you always can push up their [the employer] nose at appropriate times”.

Lena had received help from the provision’s formulations and had used them in the implementation process, especially with the employer, when she wanted them to act a certain way. She saw that the use of the provision had contributed to an improvement of the work environment and she also stressed that the clarity in the provision enables her to show the employer exactly what it is they have to relate to. It seems that the provision has been successful in “teaching” new behaviours which, in this case, have been used by the safety representative. In order to implement as effective as possible, street-level bureaucrats – per their discretion - develop routines of practice. Here, this safety representative created a routine where she persistently used the provision during, what she saw as, appropriate times.

When asked about the difference before and after the provision came into force, Lena said:

“It is much clearer now, that you can not actually ignore organisational issues, because they have a very big bearing on the employees' working environment, on working conditions, on everything. And you can not just ignore it and do business as usual”.

One of the headmasters stated almost exactly the same as Lena, when asked if she had viewed any difference after the creation of the provision:

“... I think the questions have been given a different status and they are now more of a given (...) in fact, I think there has been a transfer, that no one today can question that it [organisational and social work environment] is important to work with.” (interview with Elin).

According to Elin, work environment now has a bigger discursive place and a different status, assumingly a higher one.

A headmaster, Niklas, claimed that he had received much help from the provision and also mentioned the clarity in the provision as one of the reasons why he liked it. According to him, the provision was “important and great”. After having read the provision and decided that he wanted to implement it, Niklas set up a working group together with three headmasters from the municipality and six employees with ties to labour unions. They sat down for almost a year and discussed point by point, creating a document made out of their interpretations of the provision, containing priority lists that teachers can use when they experience a too high workload. The clarity of the provision thus helped them implement it in practice. By creating a document made out of their interpretations, this headmaster exercised discretion. According to Lipsky, street-level bureaucrats come up with ways of handling difficult tasks (2010, xi-xii). Creating the document can have been a way for this headmaster to simplify the implementation of the provision. It is also interesting to point out that even though he had appreciated the clarity of the provision, they still created their own document with interpretations. Perhaps certain aspects and meanings from the provision might have been lost in this interpretation, or perhaps some things might have been gained.

Safety representatives and headmasters alike complimented the design of the provision, emphasizing its clarity and ease of use and application in their respective contexts of work. One safety representative claimed:

“The provision came as a blessing from above, according to us. Once we got into it, we really thought it went hand in hand with what we were trying to achieve, in terms of work environment (interview with Ted).

The language, formulation and clarity of the provision has thus been brought up as opportunities for implementation. This shows that the policy design, meaning the language and clarity of the policy, can be an important factor for whether or not a provision will be implemented. In the case of this study, this has shown to be especially important. Discretion has to do with street-level bureaucrats freedom to create their practice, something that can be done through interpreting the provision. Street-level bureaucrats always have to relate to laws and regulations, and a policy design that would require the bureaucrat to interpret vague or ambivalent concepts would likely be a barrier in the implementation process.

The next section presents what safety representatives and headmasters stated about the implementation itself and some of the strategies they have used in the implementation process.

4.2.2 Uses of the provision

This section contains examples of how and when the provision has been implemented, both by safety representatives and headmasters. The interview subjects mainly brought up that the provision has been used for structuring and organising teachers' workload and work tasks. The safety representative Karl said that when they were pushing the issue of the general workload at the school, they deemed it to be natural to use the provision, because it offered them a sort of solution. Karl emphasized that the provision should be followed, because then they can distinctly see what kinds of work tasks there are and it becomes clear how to prioritize that work. What was positive about the provision according to Karl, was that it could be used in order to clarify teachers' priorities within their work tasks. The headmaster Nour stated something similar to Karl:

“... once you get into a situation where a coworker needs help to prioritize, you need something to lean on and I think this material gives us that.”

Nour had used the provision with her employees to structure the teaching assignment and to create a common picture of what the teaching assignment should contain. This work had been very valuable according to Nour. She added that the provision can be used as a preventive measure:

“It is good that it [the provision] is known about already before you end up in a situation where you have an unsustainable workload. It is also a little easier to recognize that you need to go to your manager and ask for help, before you already are in an unsustainable situation.”

According to Nour, it is now easier for teachers at her school to talk to their employer compared to earlier, which the provision has contributed to. Both Karl, the safety representative, and Nour, the headmaster, were able to draw benefit from the provision to better structure the distribution of teaching assignments as well as help clarify what such an assignment should entail.

However, it seems that Nour is placing responsibility on the individual teacher to understand that the situation can become unsustainable and leaving it up to them to come to her and ask for help. From this quote only, we can not know how easy it is for the employees to talk to the headmaster.

Another headmaster, Alexandra, claimed that she saw a clear change between before and after the provision was implemented, as she now places more effort on doing risk assessments before deciding on the division of tasks. She also has individual meetings with employees, not just about the division of tasks, but also about their reflections on how it might affect them beyond their work, and their thoughts about stress and work tasks. This sort of work became more systematic after the implementation of the provision according to Alexandra and she also claimed that she follows it up more in her talks with the employees. It seems here that Alexandra has the genuine intention to implement the provision, and that she does so in more than only creating priority lists. She has been able to incorporate

working with work environment in her routines and does not give any indication that it has been difficult or in conflict with any other work, or that she has shifted the responsibility on the employers. In this way, she – as a street-level bureaucrat – has been able to draw on the provision to reconfigure her routines and practices in ways that have yielded constructive results for implementation, rather than the contrary.

When asked about the role of the employer when it comes to being responsible for the employees' work environment, the headmaster Niklas stated that he had learnt to do things in different ways while working with the provision. For example, when an employee has too much to do, he has tried to help that person prioritize and to do things differently.

It can thus be seen by these answers, that the provision has provided both headmasters and safety representatives with new ways of identifying and preventing stress-related health risks, and also to resolve existing or emerging problems, such as by setting up priority lists and defining the teaching assignment. Nonetheless, it is evident that discretion in doing the job of implementing the provision has the effect of modifying the meaning of the provision. One headmaster's reflections indicated a deflection of responsibility onto employees rather than actively – as a manager - ensuring each employee has a reasonable workload. This deviates from the provision's wording with consequences for quality of the implementation.

4.2.3 The headmaster's obligations

As previously mentioned, lower-level managers can by Lipsky be considered as street-level bureaucrats because of their position of working on the ground-level (2010, p. 242). Whether managers can be considered street-level bureaucrats or not therefore has to do with the context they work in, and in this study, as the headmasters work on the ground-level they are viewed as street-level bureaucrats. When it comes to headmasters' motivations behind implementing the provision, one headmaster, Niklas, had this to say:

“I want people to feel good. Everything gets better then, for everyone.”

Implementing a provision that was made with the intention to improve work environment can be an incentive in itself and lead to an outcome that is good for everyone. However, this is not done without issues. The headmasters were asked what they thought of their obligations as employers. One thing that was brought up, was the issue of maintaining a good work environment while at the same time maintaining a budget. For the headmaster Alexandra, weighing the budget against the work environment should not mean that the work environment should be neglected. She claimed that keeping a budget should not affect the work in a way so that work environment problems associated with dangers are created, or so that

the employees can not carry out their work. While being responsible for the work environment, Alexandra has viewed the provision as a support for her as well, and not only as a support for the employees. At the same time as she is weighing her budget against the necessary precautions that need to be made while implementing the provision, she claimed that she still has to stand up for the work environment she wants to have at her workplace.

She also claimed that she does not believe she would ever skip working with the work environment, or ignore it, and that if she came to a point where she felt that she could not maintain her responsibility of ensuring an adequate work environment while at the same time keeping the budget, she would turn to her manager and ask them for help rather than ignoring her obligations completely. This statement shows a couple of things. Firstly, it shows that the headmasters are in fact lower-level managers as they too can turn upwards for help and guidance. Secondly, it shows that the street-level bureaucrat approach fits neatly into the dilemma faced by headmasters, as Alexandra's statement displays that a significant level of discretion is central to the role, as they themselves can choose to what extent they want to prioritize a good work environment, specifically with regards to keeping a budget. Charged with many difficult tasks, they must somehow manage their complex jobs by developing routines of practices with considerable influence on the outcome of their efforts. For instance, rather than "turning to her manager and ask for help" from the onset of implementing work environment provisions, such a move would be reserved for the unlikely yet dreaded outcome of it "coming to a point" where the responsibility of maintaining an adequate work environment as well as keeping the budget, would be nearly impossible. In this way, it is possible to see that part of managing a difficult job has been for Alexandra to develop routines of practice where her manager is not directly or actively involved. Turning to the manager is a last resort. Yet, it is likely that, including higher management would improve the outcomes of implementation efforts. We may then ask, what are the consequences for good work environment if higher management merely delegates below without active and recurring support in that work?

Continuing with the responsibilities and obligations of the headmasters, the headmaster Nour had this to say about her thoughts when she first read the provision:

"The very first thing I thought was "oh, this is really a gigantic responsibility" because it is, of course. The demands on the employer are huge, the demands on the teachers are huge too, but the demands on the employer are gigantic. But I think that as we have been working on it together, it has become manageable."

Nour also mentioned that it became easier to implement and use the provision over time and that because of the clarity in the provision, she came to see it as a more manageable task, even though she still views it as a big responsibility.

In summary, barriers within the implementation process can be to keep a budget vis-à-vis maintaining a good work environment, as it can be difficult to make

cutbacks while at the same time keep the necessary resources for employees. The judicial obligations of the headmasters require them to implement the provision as it is helping the work environment, but it can be reported by headmasters as being at odds with keeping a budget. The different and sometimes paradoxical obligations for employers can be a barrier and, while exercising discretion, they have to decide how to prioritize their obligations.

Niklas, a headmaster, identified another barrier for implementation – the lack of knowledge of the provision. He said that all school leaders should be familiar with the provision and understand how to use it, but if they do not have this knowledge, it turns into a major obstacle for implementation. However, according to Niklas, the problem is not only that the school leaders are not familiar with it, teachers may not be familiar with it either. He claimed that many from the staff did not bother to read the provision, leading him to have had to tell them to read it. This lack of knowledge goes under the category of what Lipsky would refer to as personal resources (1980, p. 29-31). Niklas's account indicates that a lack of knowledge of the provision is hindering implementation, and that he himself had to actively encourage teachers to familiarize themselves with the provision. That this lack of knowledge is reported as a barrier to implementation, comes as little surprise considering the dilemma of Swedish schools today. Teachers are overburdened with documentation and their work is regulated by several policies on top of legislation in the area of education. As such, it can be said that Niklas' instruction worked to break established routines of practice in favour of new routines where teachers actively familiarize themselves with the provision.

4.2.4 Safety representatives' strategies for implementation

As aforementioned, safety representatives have a unique role in ensuring that the WEA is followed, as a consequence of their judicial rights. A specific example of this can be found within chapter 6, section 6a, in the WEA. This paragraph states that the safety representative has the legal right to ask the SWEA to interfere at the workplace if it is deemed needed for achieving a satisfactory work environment (SFS 2019:614). This procedure is usually called filing a 6:6a report and it can be used within the process of implementing a provision or policy.

Safety representatives in schools sometimes file 6:6a reports as a way to make the SWEA inspect their workplace when they are in disagreement with their employer (Tenfält, 2017). If the safety representative deems that certain measures need to be taken in order to achieve a satisfactory work environment, they should firstly turn to their employer (SFS 2019:614). Upon application, the employer has to respond in the matter without delay. However, if the employer does not agree with taking the required measures, the safety representative can file a 6:6a report, something that the employer is not allowed to prevent them from doing. Filing a 6:6a report should only be done if the employer has not taken the necessary steps

first. If the SWEA agrees with the safety representative, they can open a case (Nitzelius & Söderlöf, 2018, p. 49).

The strategy of filing a 6:6a report has been used by safety representatives in their implementation of the provision on Organisational and social work environment. To give an example of how the process might look like, a case from Lund municipality where a 6:6a report had been filed is brought up as it was mentioned by one of the safety representatives I interviewed, Ted. It had started with surveys on work environment which one teacher's union in Lund municipality had let teachers answer, as a way to incorporate their opinions. These surveys were handed to the employer. The safety representative Ted stated that with the creation of the provision on Organisational and social work environment, the teacher's union could intensify the pressure on the employer as the provision focused on the same issues they were faced with. The teacher's union handed in yet another work environment report made out of surveys answered by teachers to their employer, the Child and Education Committee in Lund municipality, and a list of ten proposals for improvements. The employer responded that they would together with the concerned parties, such as workers from the municipality, unions and politicians, create a common picture of the teachers' work burden and come up with relevant measures to take (Barn-och skolförvaltning, 2016). Upon hearing this, the teacher's union created one more report based on a survey on work environment and showed that relevant measures had not been taken, whereby they therefore stated that the employer had not fulfilled their answer (Begäran enligt 6:6a, 2017).

A 6:6a report was filed by the head safety representative from the teacher's union and handed in to the SWEA, who opened a case. They inspected the workplace and took the formal decision that the employer should take certain precautions. The employer was given a time period where they were supposed to come up with the necessary measures and if they would not do so within the given time frame, they would be given a penalty fine. The provision on Organisational and social work environment was referred to by the head safety representative and by the SWEA in the decision handed to the employer (Beslut, 2017). This is thus an example of how safety representatives can use a 6:6a report to implement the provision and this example shows that within this strategy, their discretion plays an important role. Through their discretion they have been able to come up with the strategy of using a formal law as a way to implement the provision.

I asked both headmasters and safety representatives what their thoughts were about safety representative's right to file a 6:6a-report, with regards to implementing the provision. All headmasters were positive about the fact that the paragraph exists and about the safety representatives' judicial role, but they also saw the filing of a 6:6a-report as a last resort that should only be used if it was not possible to achieve cooperation between the employer and the employees. Elin is one of the headmasters who expressed exactly this and stated that she was positive about the paragraph, but that it should preferably not have to go so far. She claimed that she thinks it is good that someone can "pull the brake" sometimes, meaning to

stop a problem from further developing. The filing of a 6:6a-report can thus be seen as a way to hinder a situation from escalating.

Another headmaster, Alexandra, expressed similar thoughts:

“I think in general it is good to have that opportunity, because there are employers who are not that good at caring about the work environment (...) but I also believe that with good cooperation and good communication, you should not have to end up there. (...) I would not want to end up there, I hope people talk to me before, so that we can address it.”

Alexandra also mentioned that without the possibility of filing a 6:6a-report, the safety representatives could find themselves in a situation where neither the employer nor the state agency would be able to help them, meaning that the problem at hand would not be able to be solved, even though both the employer and the SWEA has an interest in ensuring a good work environment.

Furthermore, when it comes to the role that the safety representative has, the word ‘power’ was used by both one headmaster and one safety representative. According to the headmaster Niklas, the employees and labor unions have a power position with regards to the WEA. He expressed the following about filing a 6:6a report:

“I think it is very good, because as a labor union organisation and as an employee, you have quite a bit of power and the Swedish Work Environment Authority is on the side of the work environment. Then it is very good that you can use [the paragraph] because there are some employers who are not doing what they should. It is good to be able to turn to someone and be able to say, "hello, we need help".”

One safety representative also mentioned the power position, but stressed that he sees filing a 6:6a report as a last resort to be used:

“... a safety representative has tremendous power, so their role is very important. However, my definite opinion is that (...) the 6:6a report is a bit of the ultimate weapon you can rattle with. So I do not want, at least when we talk within [my union], any inflation in the use of the 6:6a paragraph, because then it loses its value. I think you should file a 6:6a [report], when you are really not getting through in any other way.” (interview with Ted).

It thus seems that the power position comes with responsibility and, according to Ted, should be used carefully and not too often. This can be connected to the concept of discretion, as safety representatives have to consider when they are exercising “too much” discretion and ask themselves how often they should use a certain strategy. By using it too much, it might mean that it would no longer be helpful, and so a balance needs to be found. There is thus an interpretation that has been made on how often this strategy should be used, and one can see that the safety representatives in this case have formed a routine of practice where they have put

strategies in a certain order, some to be used on an everyday basis and some only to be used as a last resort.

As mentioned, using the paragraph has for some safety representatives been a strategy for implementing the provision. When asked what the paragraph 6:6a meant to her, one safety representative answered:

“It makes it possible to push much harder. If nothing happens when you have tried to pursue a case and it is not leading anywhere, and you might have tried at the next level in the municipality and still nothing happens, then you have this opportunity to use [the paragraph] here.” (interview with Lena).

Lena also mentioned how the paragraph can be used as a threat.

“... very often it is enough to leave [the report] to the employer and the employer mutters for a while and then something starts to happen, because they do not want it to go to the Swedish Work Environment Authority.”

In this case, Lena meant that the outcome of filing a 6:6a report will not be a desired outcome for the headmasters and she had seen that they began to act only when they were faced with the possibility of being inspected by the SWEA. She developed a routine of practice by realising that using the paragraph as a threat can be a way to help make the implementation more efficient.

The safety representative Ted also viewed the use of the paragraph as a threat and gave an example of a strategy he had when the employers did not come up with a solution. In that situation, he would turn to the head of management at the next meeting and tell them that he is considering to file a 6:6a report to the SWEA. He continued:

“Just the fact that I threaten to do it, usually makes them come up with a solution. Because if a 6:6a report comes to the Swedish Work Environment Authority, it also becomes a public document which the media can see, and it can be stated via the media that there are work environment problems at this school. And in general, the employer does not want bad publicity.”

Ted expresses the conflicts that can arise between safety representatives and headmasters. In this case, headmasters would care more about the school's image than about solving the work environment issues by implementing the provision.

Another safety representative, Karl, also talked about getting the employers to comply as he mentioned that he has filed a few 6:6a reports when he was active in the union, and for him it is clear that he sees it as an important strategy. He claimed that he often had encountered managers who did not want to comply with the work environment regulations and who saw the WEA mostly as recommendations, not something that has to be followed. According to Karl, when the safety representative and the headmaster do not agree, the next step becomes to turn to the headmaster's manager and if they still can not reach an agreement, there is no other

option than to file a 6:6a report. Alternatively, as Karl saw it, that the SWEA would have to go and constantly inspect all workplaces throughout Sweden. Karl pointed to the fact that even though the SWEA has the responsibility to ensure that the WEA is followed in every workplace, it is still the responsibility of the employer to make sure that the work environment is adequate at their workplace. That the SWEA would be able to inspect every workplace in Sweden all the time, is perhaps not a realistic or a desirable scenario, according to Karl who said:

“... you can call it [the Swedish Work Environment Authority] an inspection authority, but they can not actually inspect all workplaces they are responsible for, so the safety representative is the Swedish Work Environment Authority’s extended arm in the labor market, you could say.”

One opportunity for implementation is to see the strength in the laws, in the state authority, and in the unions. Their collaboration with the SWEA has been shown to enable them to act in favor of work environment and, in extension, enable them to carry out their aim of implementing provisions. The safety representatives have used their discretion to interpret their role and to come up with strategies that can act as opportunities in the implementation process. They recognize that they have power and that this power comes from their cooperation with the SWEA. Through their discretion, they have routinized depictions on what is possible and impossible to do, and in what order things should be done. That the filing of a 6:6a report should be a “last resort” is something they have interpreted and come up with, and it seems that they avoid excessively filing a 6:6a report in order to avoid conflicts with the employer.

The headmasters and safety representatives are in agreement that filing a 6:6a report should only be made as a last resort, when employers and employees can not cooperate. This leads us to the question of how often the paragraph should be used. I asked one safety representative, Mattias, what his thoughts are on the safety representatives’ right to file a 6:6a report and he answered that he thinks it is great that it can be done. He added:

“What I find strange is that safety representatives are a bit of an overlooked resource. There is too much effort put on work that is related to union politics, instead of putting more effort into the work of the safety representative and [that] legislation.”

I asked him why he thinks that their judicial prerogatives are not used often enough, and he answered:

“I think that to a certain extent it is about fear, because not all things you do as a safety representative is approved by those you represent.”

In a way, this statement is in contrast to previous statements that have highlighted the safety representative’s power positions, as Mattias here mentions fear as an

emotion that safety representatives can feel while going against the will of the employer. It thus seems that the feeling of being in power might not be consistent for all, in all scenarios. This fear becomes a barrier to implementation which might have to do with the fact that using the paragraph is a "last resort", meaning that it should preferably not be used and therefore, only the thought of using it generates fear. In this case fear leads to coping strategies which have a negative result for the implementation of the provision.

In summary, all headmasters were of the same opinion that the 6:6a report can be used when the employer has failed to cooperate with the safety representatives. That the paragraph should be used *before* major problems have been revealed, was also important according to one headmaster.

"... our ambition is to cooperate in a preventive way, in good time before we encounter problems. So we do not want to end up in problems, we want to sort out the problems before they come up to the surface. (...) but when we do get caught up in a problem, then it is much better to have other ways to solve it." (interview with Nour).

Nour thought that the formal way (filing a 6:6a report) is helpful, even though she would not want to end up in that situation. She sees filing a 6:6a report as a way to solve what she called "real" problems when they arise. She also thought that it is absolutely necessary for the workplace that safety representatives can file a 6:6a report.

"If you talk about safety, if you talk about everyone's right to a good work environment, then I think these formalized roles are very important. Because, sometimes as an employer you can become blind, and employees can become blind in their own situation too. Then, the [formal] roles are important, because if we really want what is best for each other, we have to have some formalities to fall back on." (interview with Nour).

In summary, through the interviews we see that safety representatives and headmasters have developed certain routines and approaches towards filing a 6:6a report. The headmasters are positive towards this legal function, however, they have a distinct thought on when it should and should not be used. The safety representatives prefer, because of fear or other reasons, to see the filing a 6:6a report as a last resort and in doing so they have exercised discretion as they have come up with their own practice. Filing a 6:6a report can be viewed as a way to break a negative pattern of bad implementation or of non-implementation. Yet still, the safety representatives preferably do not want to use it in firsthand and seem to associate this seemingly neutral law to negative things, such as starting a conflict with the employer. To recognize that this paragraph can be used as a support is thus an opportunity in the implementation process.

4.2.5 Dual roles

All four headmasters interviewed in this study had experience of previously working as a teacher and they had all worked as headmasters for more than ten years. Two headmasters also had experience from being active in a union for employers in schools. The headmaster Elin claimed that after she had gotten used to her profession of being a headmaster, she felt it was quite natural for her to become active in the union. Her time in the union gave her more perspective, as she put it:

“I am very happy for all my years as a unionist [because] in the role I have now, I have a different view on things.”

Furthermore, the headmaster Nour had experience of being a board member in the union for school principals at the same time as the municipality worked with the provision. This led her to have seen the provision from the headmaster’s perspective, while at the same time being active in a union. She perceived the provision to be supporting headmasters in their assignment, and even though she saw it as being made primarily for teachers, she believed it to help make the headmaster’s assignments more manageable too.

Alexandra, another headmaster, had been a union representative before she became headmaster, and said:

“... even though I am on the employer side, I still think that we have a joint assignment here. We are supposed to provide good education for students and it is important to remember that, regardless of whether I am coming from a union or if I am an employer.”

Additionally, safety representatives in schools can also have dual roles if they have been appointed safety representatives at their workplace as that would mean that they are there both as teachers and as safety representatives. This dual role was problematized by the safety representative Lena. She stated that she had to make sure to be very clear with the headmaster when she was representing her different roles and that she was concerned that the headmaster would not be able to see which role she was representing. This was something that would pose a problem for her while trying to carry out her duties as a safety representative.

Working with the division of work tasks and organising in which order they should be prioritized, is done in schools as a result of implementing the provision. Something to consider when it comes to organising the work tasks is the ambiguities and boundlessness that can take place if an employee has dual roles. As mentioned by Lena:

“... the question of priorities was very clearly included [in the provision], that the employer should help prioritize work tasks and counter ambiguities and

boundlessness. Because the teaching job, together with the time spent on union work, is incredibly boundless and the union role is as well, so I have two boundless assignments that go into each other.”

This safety representative problematized the boundlessness and overlapping nature inherent to having to combine her teaching role with her role as a safety representative, causing ambiguity with implications for the outcome of either work. By this quote it is presented that the ambiguities and boundlessness is a barrier for implementation. The quote also indicates that a necessary prerequisite for establishing clarity in the roles and assignments, is for the employer to actively participate in establishing routines conducive to implementation.

As stated by Lipsky, experience is an important personal resource for street-level bureaucrats (2010, p. 31). This is the case for the headmasters as well, because, as seen through the quotes, their level of experience matter in how they view and handle the implementation. Having experience from different roles matters, which seems to be the case for safety representatives as well, but in their case it can be more of a barrier since they have to juggle the two roles.

4.2.6 The importance of cooperation

The headmasters and safety representatives talked about the cooperation between the actors and their answers will be presented and analysed in this section, in accordance with Lipsky’s writings on the relationship between the employer and employees (2010, p. 18-19).

Lena, one of the safety representatives, claimed that the employer could be reluctant to cooperate. For her to make the employer understand and agree with her point of view, she had to repeat herself with what she called “an incredible insistence” which would often disrupt the peace with the employer.

“You keep going on and on until [the employer] agrees to change routines and the way of working.” (interview with Lena).

This reluctance of the employer can be a barrier for implementation, one that Lena tackled by continuing to try to get her voice heard until she could reach an agreement with the headmaster. The negative social dynamics, that can be caused by different priorities between the employer and the employees, are thus identified as barriers. One headmaster, Alexandra, mentioned having a bad climate for dialogue in the workplace as a barrier for implementation and the safety representative Karl continued on the same track:

“After all, there is a mental resistance for people to go to their boss and say "I can not do my job, can you please remove one of my work tasks?" (...) that would not

be a big plus during the salary negotiation. I have heard many people say, "I do not want to talk to my boss".

A barrier for implementation can thus be a worry that talking to the employer about wanting a reduction in work tasks will have a negative impact on the salary. When asked about what barriers he sees for implementation, the safety representative Karl answered:

“... it is resistance from the headmasters, and the employees do not want to take responsibility themselves. But then it [the provision] always lies there and lurks in the background and is something that the union can activate. Maybe it helps make the discussions a little more constructive...”

As Karl's response indicates, a sort of routine of avoiding implementing the provision is established, rooted in reluctance on behalf of the employee to take responsibility and resistance from the headmaster. The result is a stagnation of the implementation process. Furthermore, Karl's response indicates that he recognizes the joint force of the labour union and the provision as something that can be used to ensure more constructive dialogue and implementation.

Karl also brought up the problem of keeping a budget while still maintaining a good work environment:

“... one might think that when a state agency, an inspection agency, releases a new regulatory framework, it would simply be followed and not misinterpreted. But when it comes to work environment regulations, there is unfortunately an opinion in the municipalities that they should primarily keep a budget and secondly follow the work environment regulations. Then it becomes a damn fight sometimes for us safety representatives, which is sad and very strange too. (...) it is a shame and it is unfair and pretty strange.”

As stated by Lipsky, there can be conflicts between employers and employees (2010, p. 18-19) and as the results from the interviews show, these conflicts can be barriers for implementation. Goals and priorities set at the top of leadership may or may not translate or align well with goals and priorities on the ground. The provision is technically not subordinated in relation to any other legal framework, but as Karl indicates, municipalities typically prioritize keeping within the limits of a budget to the detriment of following work environment regulations. Conflicts arise as decision-makers – either by not involving themselves directly by delegating responsibility or prioritizing other matters – fail to hear and address grievances communicated by, in this case, safety representatives. The problem of navigating through different and sometimes conflicting goals and priorities stands out as a prominent barrier.

In the cases mentioned above, it has been shown that despite the headmasters' legal obligation of being responsible for work environment, it is still through safety representatives' initiative that implementation is made. This shows the important

role that discretion plays, as it enables the safety representatives to use certain strategies in order to be able to carry out implementation even if headmasters are against it. For headmasters to claim that they prioritize work environment and deem it to be important, does not have to be the same as actually implementing the provision in practice.

5 Conclusion

This chapter includes a summary of the results depicted in the analysis and connects them to the research questions in this study. It also contains a suggestion for the facilitation of policy implementation in schools, based on the results from this study. The chapter ends with a section on suggestions for future research.

The aim of this study was to develop new knowledge on how safety representatives and headmasters have implemented the provision on Organisational and social work environment in schools and the study has used implementation theory to achieve this aim. Firstly, the concept of policy intention was used to find out the purpose of the provision as well as the reasons behind its creation. According to the findings, the purpose of the provision was for it to be used by employers and employees to help improve the organisational and social work environment at workplaces. The provision was created because these issues had become a priority for the Swedish government.

Secondly, Lipsky's theory on street-level bureaucrats was used in the study in order to investigate how safety representatives and headmasters exercised discretion in the implementation of the provision, and to identify what barriers and opportunities they encountered while implementing. The findings show that discretion was exercised in numerous different ways and that there were a number of barriers and opportunities found, and these will be presented and summarized below.

5.1.1 Opportunities in the implementation process

Three main opportunities were found, the first one being the design of the provision - namely its language, clarity, and formulations. Both safety representatives and headmasters had benefited from wordings of the provision and in some cases these wordings had led to a change in how they discussed certain topics, for example stress. This shows that policy design is important in the implementation process because it can affect the behaviours of street-level bureaucrats during the implementation phase. Moreover, street-level bureaucrats' level of discretion while interpreting the provision is also an important factor in the implementation process. Because ultimately, even though a provision might use a certain formulation and wording, it is up to the street-level bureaucrats to interpret these formulations and wordings. While doing so, street-level bureaucrats 'make' policy in the sense that their interpretation affects how implementation will be done. This is seen through

the results of the study, for example when a headmaster pointed out that they now talk more about stress after implementing the provision. Another example is when a safety representative pointed out that they now have a different reasoning on resources and demands in the job. In these cases, it is shown that the provision can act as an enabler of a good work environment.

Furthermore, filing a 6:6a report to the SWEA was a strategy sometimes used by safety representatives, which is found to be the second opportunity for implementation. Filing a 6:6a report became a way for them to exercise discretion as it was a strategy they themselves had come up with, to facilitate the implementation of the provision. The results show that there is a consensus between safety representatives and headmasters that the possibility of filing a 6:6a report and summon the help of the SWEA is a good thing. However, some interview subjects expressed that it should not be done too frequently and preferably as a last resort. Preferably, the problems at the workplace should be able to be solved without resorting to filing a 6:6a report, according to the interview subjects.

The third opportunity for implementation of the provision is found to be a good climate of dialogue at the workplace where employees could feel that they are allowed to turn to their employers with their problems and that they are being listened to. However, the results show that this was not always the case at their respective workplaces. Safety representatives would therefore use the strategy of being persistent with the headmasters in order to make them comply with their conditions. Respectively, some headmasters tried to work with issues in a preventive way so that cooperation could be facilitated. Furthermore, headmasters who had experience from being active in a union saw that their experience had impacted the implementation process to a certain degree. This experience gave them more perspective, something that could be an opportunity for implementation.

5.1.2 Barriers in the implementation process

Continuing with the barriers for implementation, one barrier that is shown from the results is negative social dynamics in the workplace. This can be characterized by employees not daring to talk to their employer about their problems related to work environment. Also connected to negative social dynamics was the fear that could be felt by safety representatives in going against the headmaster. The negative social dynamics could lead to conflicts or negative consequences for employees' salary negotiation. For safety representatives and headmasters to have different goals and priorities, could therefore be a barrier in the implementation of the provision.

For the safety representatives in particular, another barrier was having to act in dual roles because the headmaster would not always be able to differentiate between their two roles, causing unwanted confusion and a problematic ambiguity. The

results show that having dual roles can impact the implementation process for both headmasters and safety representatives.

Another barrier that complicated implementation of the provision, was that headmasters had to make complex decisions while being responsible for both the budget and the work environment. In this case, whether the work environment is rendered a priority or is neglected in favour of budgetary concerns, hinges on the individual headmaster's discretion.

Lastly, one barrier that was brought up was a lack of personal resources in the form of knowledge, as one headmaster pointed out that his employees did not have enough knowledge about the provision.

5.1.3 Concluding remarks

In summary, the results show that the implementation process of this particular provision for headmasters and safety representatives is divided in three stages. The first stage contains them making an interpretation of the provision. During the second stage, they identify the need for implementation, and during the third stage, they carry out the measures needed for implementation. All stages require and rely on their discretion. The headmasters and safety representatives interviewed within the focus of this work, are charged with the responsibility to initiate and sustain efforts to promote and ensure good work environment and prevent risks of ill health. While doing so, they encounter certain opportunities and barriers during the implementation process and this is the case for street-level bureaucrats everywhere when they implement policies. The provision itself can not prepare the actors for all obstacles that will come in the way of implementing them. Lipsky meant that even though the policy formulation and policy design initially frame the work with the implementation, the "real" policy is the constant and regular (re)produced product that the bureaucrat creates. The street-level bureaucrats have to tackle difficult implementation processes by creating new strategies and practices (Lipsky, 2010, p. xiii). The discretion they have, meaning the interpretations they make independently of the provision, thus becomes important for the implementation process. Exploring how safety representatives and headmasters practice discretion thus becomes an important and instructive method from which to understand how policies can be implemented and what stalls their implementation.

Therefore, implementing a policy or provision has much to do with strategies used on the street-level. In the case of the implementation of this provision, it seems that both the language (policy design) and the strategies used enabled for it to be implemented. However, the strategies used for implementation is not something that the provision brings up, meaning that it might not have been anticipated. A suggestion for the facilitation of policy implementation is thus to involve stakeholders already in the formulation phase of the policy, in order to obtain a greater understanding of the needs of stakeholders. This is important especially in schools, since a deteriorating work environment is the reality of many schools

today, much because of organisational and social factors. To come to the root of these problems, the opinions of key actors in implementation should be included.

Furthermore, in the case of this study, the provision in question is targeted towards the workers themselves, and is therefore not directly a service for clients. This means that implementing the provision directly impacts their work environment, which is naturally different compared to implementing provisions or policies targeted towards clients and it might therefore change the incentives for implementation. Having used Lipsky's theory in this study shows that his theory can have a large area of application and utility as it can be used for analysing the implementation of policies directed towards workers themselves.

5.2 Suggestions for future research

As has been seen from the results of this study, the language used in policies and provisions can have an impact on street-level bureaucrats' routines of practice within the implementation process. Therefore, combining the study on policy design with the study on the implementation process that takes place on the street-level, is suggested for future research. Like my study, future research might also benefit from studying different actors whose work is regulated by the same policy or provision.

Furthermore, more research is needed on safety representatives' involvement in the implementation of provisions on work environment, because of their unique judicial role and because of the discretion they exercise.

Future research in this field might also include other actors' perceptions, for example inspectors from the SWEA. They are street-level bureaucrats who play an important role in the implementation of provisions, and their perceptions could be analysed in order to include another perspective. Future research that does not focus solely on street-level bureaucrats, could also include the perspective of higher management in order to broaden the scope even further.

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2020-03-25. Headmaster, Alexandra.

2020-04-15. Headmaster, Nour.

7 Appendix

7.1 Interview guide for safety representatives

1. Hur länge har du varit skyddsombud?
2. Vad fick dig att bli skyddsombud?
3. Vad är några av arbetsmiljöproblemen som lärare på din skola stött på?
4. Vad tror du har lett upp till de här problemen?
5. Har problemen förändrats med tiden?
6. Vad ser du för möjligheter med förordning 2015:4 om organisatorisk och social arbetsmiljö?
7. Har du använt förordningen?
8. Vad motiverade dig att använda förordningen?
9. Vad ser du för barriärer i implementeringen av förordningen?
10. Kan du jämföra tiden innan och efter 2016, när förordningen började gälla?
11. Har förordningen ändrat sättet ni jobbar med arbetsmiljö på?
12. Anser du att förordningen har bidragit till ett förbättrande av lärares arbetsmiljö, ett förvärrande, eller ingen förändring alls?
13. Har du inkluderat lärarnas åsikter om organisatorisk och social arbetsmiljö i implementeringen av förordningen och i så fall hur?
14. Kan du säga några ord om 6 kap 6a, Arbetsmiljölagen, och vad denna paragraf betyder för dig som skyddsombud?
15. Hur ser ditt samarbete med Arbetsmiljöverket ut?
16. Hur skulle du beskriva relationen mellan dig och arbetsgivaren?
17. Finns det något du vill utveckla kring?

7.2 Interview guide for headmasters

1. Hur länge har du varit rektor?
2. Har du tidigare arbetat som lärare?
3. Vad anser du om rollen som skyddsombudet har, när det kommer till implementering?
4. Vad är några av arbetsmiljöproblemen som lärare på din skola stött på?
5. Vad tror du har lett till de här problemen?
6. Har problemen förändrats med tiden?
7. Hur ser du på rollen som arbetsgivaren har när det kommer till att ansvara för medarbetarnas arbetsmiljö?
8. Vad ser du för möjligheter med förordning 2015:4 om organisatorisk och social arbetsmiljö?
9. Har du använt förordningen?
10. Vad motiverade dig att använda förordningen?
11. Vad ser du för barriärer i implementeringen av förordningen?
12. Kan du jämföra tiden innan och efter 2016, när förordningen började gälla?
13. Har förordningen ändrat sättet ni jobbar med arbetsmiljö på?
14. Anser du att förordningen har bidragit till ett förbättrande av lärares arbetsmiljö, ett förvärrande, eller ingen förändring alls?
15. Har du inkluderat lärarnas åsikter om organisatorisk och social arbetsmiljö i implementeringen av förordningen och i så fall hur?
16. Finns det något du vill utveckla kring?