

Hard work in soft regulation. A discussion of the social mechanisms in OHS management standards and possible dilemmas in the regulation of psychosocial work environment

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Abstract. The development of Danish OHS regulation The development of Danish OHS regulation The development of Danish OHS regulation

Certified occupational health and safety management (OHSM) systems have become a global instrument in the regulation of work environment. However, their actual impact on occupational health and safety – in particular on ‘softer’ psychosocial areas of the working environment – has been questioned. This has resulted in recent British attempts to develop publically available guidelines (PAS 1010) to be used together with OHSAS 18001 focusing specifically on psychosocial risk management. The paper discusses these attempts in light of recent sociological theories on the regulatory mechanisms in international standards, and concludes that the new guidelines only partially resolve prevailing inadequacies of OHSAS 18001.

Keywords. Standards, mechanisms, psychosocial working environment, sociological theory.

1. Introduction

At a global scale, standards have grown from a topic of interest mostly to engineers into having increasing impact on the organization of modern social life, including contemporary working life (Boiral 2012; Brunsson & Jacobsson 2012). The present paper aims at discussing the impact of this development on the regulation of complex psychosocial OHS issues by focusing on *the intrinsic social mechanisms* inherent in certified OHSMS.

Recent studies have identified several shortcomings in the way standards manage psychosocial work environment problems (cf. Leka et.al 2011; Hohnen & Hasle 2011). Recently, a British public guidance (PAS 1010) has appeared as a supplement to OHSAS 18001 specifically addressing psychosocial work environment risks. However, in spite of the fact that PAS 1010 can be viewed as a significant contribution it also raises some dilemmas which seem related to the ways standards work. Analyzing PAS 1010 as a ‘critical case’, we discuss these dilemmas by looking at international standards from a sociological and social constructivist perspective. The paper focuses specifically on ‘unintended’ social mechanisms in international standards and discusses possible limitations in the use of standards as a means of regulating and controlling the psychosocial

work environment.

Sociological researchers suggest that prevailing research on standards tends to conceptualize standards as either totalizing narratives dehumanizing social life or weak and insignificant forms of regulation (Timmermans & Epstein 2012; Lampland & Star 2009). Based on this, Timmermans and Epstein (2012) recommend empirical analyses of standardization. They suggest that empirical analysis in specific domains may help understanding intrinsic social implications of the increasing use of standards as a form of regulation. Empirical analysis however, should also be based on prevailing 'evaluation research' focusing on identifying certain 'generic mechanisms' in regulation (Vedung 2003; Pawson 2006: 23-24). In order to understand the distinctive impact of standardization as a form of regulation of psychosocial work environment issues, the present paper combines an analysis of such prevailing 'generic mechanisms' with a specific analysis of the implications of standards in a particular social context. The present paper carries out such an analysis, by combining a theoretical discussion of standardization as a global regulatory tool with an empirical analysis of the prevailing standards and guidelines in the specific domain of psychosocial OHS.

In the paper we identify a range of social regulatory mechanisms in certified occupational health and safety management systems by looking at standards as a social form of regulation. We do this by identifying what can be termed particular significant characteristics of standards from a social constructivist and actor-based analytical perspective (Giddens 1990; Brunsson & Jacobsson 2000; Ahrne and Brunsson 2005; Brunsson, Rasche and Seidl 2012). Viewed from this theoretical perspective the development of certain standards are not purely 'technological' and using standards as a regulatory instrument involves 'more' than just the (technical) specifications or demands stipulated by the standard. In the paper we apply the concept 'social mechanism' which we define as '*an inherent causal potential in a given social context, e.g. a causal potential that, combined with the particular context of a company, creates a reaction or change*'. This definition is inspired by an understanding of mechanisms described by Pawson, as 'semi-regularities' (Pawson 2006).

Standards can, as we shall see, be conceptualized as international, abstract expert systems usually developed by private organizations and functioning as voluntary rules of conduct as well as (political) instruments of control (Brunsson and Jacobsson 2000). Standards are also a specific form of governance and co-ordination related to an increasingly globalized market. As a part of the analysis we also discuss 'audits' as a basic component in standards from a constructivist perspective. Audits can in a social constructivist perspective be viewed as constitutive of the working environment that they are supposed to monitor (Power 1996: 1997; 2003). The paper has an empirical as well as a theoretical aim. Empirically, we aim to shed light on the regulation of psychosocial work environment. Theoretically we aim to contribute to the knowledge of the social mechanisms at work in international standards.

The structure of the paper is as follows. We start by outlining the theoretical perspective of the paper as a social constructivist framework focusing on Giddens' conceptualization of 'abstract expert systems' (Giddens 1990). In this section we also define international standards and present the methodology of the paper. This is followed by an analysis of social mechanisms in standards applying such a sociological regulatory perspective. After this we turn to the empirical part which consists of an analysis of the prevailing international OHS standards, in particular OHSAS 18001 and PAS 1010. The general aim is to depict possible dilemmas related to applying international standards (evoking particular regulatory forms and assumptions) to the specific domain of psychosocial work environment regulation. We conclude by returning to a discussion of

standards as a regulatory form and their limitations.

2. Methods

The paper focuses on international standards within the field of OHS and how they regulate and monitor psychosocial work environment. In the paper, we analyze standards as written documents and we are not concerned with the implementation of standards in practice.

The first part of the analysis is a discussion of mainly theoretical organizational studies on standards as a type of regulation. Here we focus on sociological/anthropological studies which focus on regulation in a broad sense, including types of knowledge, types of logic and reasoning as well as the overall process of creating standards (Brunsson & Jacobsson 2000; Jacobsson 2000; Timmermans and Epstein 2012; Power 1996: 1997 and Hohnen and Hasle 2011).

The second part of the paper is an analysis of concrete documents investigating the ‘social mechanisms’ of standards by looking at OHSAS 18001 (which has ‘de facto’ become an international standard) and PAS 1010 which is a recent attempt (also from the British Standardization Institute) to develop specific guidelines for creating OHS management systems within the area of psychosocial working environment. OHSAS 18001 is strategically chosen because it claims to deal with psychosocial working environment and at the same time reflects intrinsic mechanisms of a range of international standards such as ISO 9000 and ISO 14001 (Jacobsson 2000). Furusten (2000) suggests furthermore, that standards can be divided into two categories: *partial standards* which are essentially recommendations and *mandatory standards*, which organizations need to follow in order to be certified according to the standard. OHSAS 18001 can be categorized as a mandatory standard, while PAS 1010 can be classified as a partial standard.

PAS 1010 is viewed as a ‘critical case’ (Flyvbjerg 2006). PAS 1010 aims to create guidelines, which are compatible with the OHS standards on the one hand, but also aims to address deficiencies (identified in earlier studies as particularly apparent when attempting to regulate psychosocial working environment issues) on the other. Where OHS standards work with ‘abstract’ and decontextualized knowledge and perceiving OHS risks as mono-causal, ‘technical’ and ‘measurable’, PAS 1010 attempts to address psychosocial work environment risks as complex, contextualized and subjectively experienced forms of knowledge (BSI 2011). In other words, an analysis of PAS 1010 is also an analysis of the potential of standards reconciling two very different types of knowledge. In accordance with the overall social constructivist framework of the paper, we supplement the analysis of documents with a brief analysis of their creation, including information about the main stakeholders as well accounts of problems or conflicts that characterizes the process of creation. For these accounts we rely on several sources (Frick and Kempa 2011; Leka et al 2010; Ahrne, Brunsson and Carsten 2000).

3. Results

3.1. The potential of PAS 1010

Both in the introduction to PAS 1010 and in the text the domain of psychosocial work environment and the management of psychosocial work risks are acknowledged to be of a qualitatively different nature than more ‘traditional’ OH&S issues which have been the focus in international standards in this area. First, *psychosocial work environment issues are complex*. They often have several causes which may not be easily identified nor related to separate incidents, and they are interdependent e.g. problems of psychosocial nature are

often related to and impact on other work environment areas. The result is (as stated in the text) there are no ‘quick fix’ solutions to most psychosocial work environment issues. Second, *psychosocial work environment issues related to structure and organization of work* hence develops in a ‘grey zone’ covering several organizational areas including the work organization, human relations and management. In other words, the guidance does not confine psychosocial risks to individual workers’ behavior or view such risks as being solvable by ‘technical’ work prevention tools. Third, *a participative approach is advocated* in order to identify and prevent psychosocial work environment risks for two reasons: the nature of psychosocial work environment problems are subjectively experienced as well as related to objective working conditions and workers are experts in their own psychosocial working environment. The participative approach rests on a qualitatively different notion of workers involvement specifying that workers’ professional knowledge is the foundation of risk prevention within the management of psychosocial work risks. The participative approach is also reflected in the guidance acknowledgement of the role of social partners, the functioning of industrial relations as well as the condition that there is ‘the will of social partners to negotiate as equals’ (BSI 2011:3). Fourth, *the guidelines rests upon the notion that a successful management of psychosocial work risks must have a clear focus on the particular work context* by drawing on prevailing scholarly knowledge of work domains influencing work related stress and specifying key issues e.g. job content, workload, influence/control, etc. (BSI 2011:9). Finally and of importance to the specific monitoring and reviewing performance, *the guidelines emphasize that both quantitative and qualitative information* can be included in a systematic measuring of performance.

3.2 The dilemmas in PAS 1010

Although PAS 1010 is not a British Standard, it is built on similar principles as OHSAS 18001, mainly PCDA which implies a focus on a management system and on sustaining a systematic approach by relying on the development, monitoring and reviewing of a range of procedures including internal as well as external audits. It follows that the generic areas of concern in international standards in general are also at work in PAS 1010: *A technical knowledge base; a focus on procedures and audits, a difficulty in relating to local contexts* and finally, *the fact that standards are created as part of stakeholder negotiations*.

Regarding *the technical knowledge base*, PAS 1010 is concerned with ‘psychosocial risk management’ and as such focuses on building a management system. Although this includes a concern with the psychosocial working environment as well as an expectation that a management system focusing on psychosocial work risks will (continuously) improve the psychosocial working environment, this focus has some implications which are related to the knowledge base of standards. There is an acknowledgement of the fact that psychosocial work environment issues are a product of interactions which cannot always be traced as well as an acknowledgement that these issues are inseparable from ‘subjective’ work experiences. It is also acknowledged that psychosocial work risks are highly contextual and related to structural conditions e.g. work organization and employment conditions. However, the guidelines also specify that psychosocial risk management is a systematic, evidence-informed as well as evidence-driven. Evidence-informed seems to indicate something different from the more positivistic ‘evidence-based’ however it is not specified how this difference is to be understood and also not how the actual evaluation of ‘compliance’ and performance will be measured.

Turning to the generic tendency in standards *to focus on procedures* and the basis of monitoring systems in audits, PAS 1010 in spite of giving specific guidelines e.g. in the identification of psychosocial hazards also has a clear focus on the procedures e.g.

monitoring and documenting the risk assessment process. The emphasis is on establishing, implementing and maintaining procedures for the identification of hazards, etc. Consequently, the initial focus on PDCA may result in a ‘migration’ of the more detailed guidelines on the production of hazards to a concern with the procedures and processes established in order to ensure risk prevention.

Regarding the fact that *standards can be viewed as abstract rules that must be translated into local knowledge* (as well as translated back into abstract rules in order to show compliance), the PAS 1010 does seem to offer a list of contextual and organizational areas of concern. Here therefore, the guideline does not only consist of abstract rules, but also on specific guidelines which seems to be easier adapted to different local contexts. It seems, therefore that PAS 1010 by including a range of concrete suggestions and specifications on what part of the work context that needs to be included in risk assessment, makes it easier to resolve the ‘generic’ problem of local translation inherent in standards.

Finally, standards have been criticized for not being based on scholarly knowledge but on *stakeholder negotiations*. To some extent this is the case with PAS 1010 as well. Accounts of the process involved in creating PAS 1010 (Leka et al. 2011) suggest that disagreements about the extent to which standards might actually be the best solution in the regulation of and control with psychosocial working environment have resulted in some stakeholders not wanting to support the guidelines becoming a standard. In particular, it seems that disagreements about the ‘objectivity’ of psychosocial work environment issues and the lack of acknowledgement of many of these work environment issues as been largely political by nature, have prevented agreement in this area. It should also be emphasized however, that the guidelines to a larger extent than OHSAS 18001 do rely on scientific knowledge about specific areas of risk e.g. based on widely accepted ideas about work organization, influence, competency and career development, work tasks, home-work interface, etc.

4. Discussion and Conclusion

A sociological and social constructivist perspective on standards highlights a number of ‘social mechanisms’ which have consequences for the regulation of psychosocial working environment issues. International standards ‘store’ knowledge in abstract rules, which make them suitable to deal with technical, mono-causal knowledge rather than with the kind of professional practice knowledge which characterizes the knowledge relevant for the understanding of psychosocial working environment problems. Such standards furthermore focus on developing and documenting procedures and processes rather than the ‘subject matter’ of work environment itself. In particular, in the case of psychosocial work environment – which has many causes, is subjectively experienced and is also highly political – this focus does not ensure the inclusion of all relevant work context issues. Furthermore, the idea that work environment risks can be identified by audits presupposes that psychosocial work environment problems can be related to (visible) non-compliance behavior rather than the structural and organizational working context which is often forwarded as crucial by researchers. Finally, international standards need to build on abstract knowledge in order to become widely used hence standards must be translated into local practice which again must be translated back into abstract rules in order to be monitored within the system. Standards may therefore not create homogeneity, but may indirectly promote variation. In the case of psychosocial working environment, the abstract nature of standards moreover offers limited concrete guidelines for organizational management of psychosocial work environment problems.

The development of PAS 1010 can be interpreted as an attempt to develop a different

type of thinking within the framework of international standards and as such it offers an interesting case of analysis. As we have shown above, PAS 1010 shows that it is possible to diminish some of the problematic tendencies of the abstract standards such as OHSAS 18001 without renouncing the very idea of risk management by standards as such. PAS 1010 has managed to include a notion of workers' as experts in their own working environment not only as receivers of information, but as responsible in identifying a range of psychosocial work environment 'hazards'. PAS 1010 also provides concrete guidelines, based on prevailing knowledge about the type of organizational and structural configurations that may result in psychosocial work environment problems. As such it acknowledges the fact that psychosocial working environment problems are complex and a product of an interaction of several factors which may not be easily disentangled from each other. The focus on the production of psychosocial problems as originating from a broader 'grey zone' of employment conditions and work organization, including organizational areas of HR, work Organization and management, makes it possible to rely on prevailing research knowledge about what constitutes psychosocial working environment risks. However, there are also drawbacks in PAS 1010 which may limit its potential. PAS 1010 has copied the model of PCDA from prevailing standards such as ISO 9000 and OHSAS 18001. These standards are characterized by having a clear focus on procedures and processes of documentation and by a reliance on abstract, technical, objectivist and mono-causal knowledge. It is not immediately apparent how such predominantly positivist knowledge base can be combined with the (proclaimed) different epistemological understanding of working environment problems and their causes in PAS 1010. Concretely this dilemma is exemplified in differences in vocabulary. PAS 1010 rests on evidence-*informed* knowledge however, it is not specified how this is supposed to be different from the more positivistic 'evidence-based' knowledge in OHSAS 18001. PAS 1010 claims to promote a participative and more structural oriented holistic perspective on work and working environment, however it still remains to be seen how the prevailing ambiguities can be reconciled in practice.

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