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# REVISITING LIPSKY'S DILEMMAS: EXPERIENCING HYBRIDITY AT THE FRONT-LINES. THE CASE OF THE BELGIAN FOOD SAFETY AGENCY

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# REVISITING LIPSKY'S DILEMMAS: EXPERIENCING HYBRIDITY AT THE FRONT-LINES – THE CASE OF THE BELGIAN FOOD SAFETY AGENCY

## Abstract:

This contribution revisits foundational notions from Michael Lipsky's seminal book on Street-level Bureaucracy in a context of public sector reforms. Revisiting key Lipskian notions such as discretion, tensions and coping mechanisms, the paper develops a research agenda by drawing on the articulation between managerialism and professionalism. It puts forward (1) the importance to study the penetration of managerialist reforms in street-level bureaucracies and their articulation with their professional historical counterpart, and (2) the tensions this combination generates as well as the way street-level officials engage with them. These tensions are interpreted as a dynamic framework mediated by two competing institutional logics – managerialism and professionalism – where individuals renegotiate principles of action, criteria of accountability, sources of legitimacy, and, more crucially in this contribution, subjectivities. To address such an agenda, it draws on an analytical construction based on the institutional logics perspective. The case of the inspection services of the Belgian Food Safety Agency is studied with the aim of providing empirical flesh to the reflection. While revisiting key dimensions of street-level bureaucracies in a context of managerialist reforms, the paper responds to specific calls in the literature for reintroducing managerialism and professionalism in street-level analysis, and providing a more refined understanding of what underpins behaviors at street-level.

## Résumé:

Examinant l'influence des réformes managériales inspirées de la Nouvelle Gestion Publique, la présente contribution revisite un ensemble de notions centrales amenées par Michael Lipsky dans son ouvrage sur la *Street-level Bureaucracy*. Faisant appel à la littérature articulant managérialisme et professionnalisme, elle met ainsi en exergue (1) l'importance d'étudier la pénétration des réformes managériales dans ces organisations tout en examinant leur articulation avec la présence historique du professionnalisme, et (2) les tensions que cette combinaison génère ainsi que la façon avec laquelle les *street-level bureaucrats* y font face. Ces tensions sont lues comme des cadres dynamiques alimentés par deux logiques concurrentes au cœur desquels les individus renégocient les principes d'action, critères d'imputabilité et sources de légitimité et, de manière centrale, leurs subjectivités. Dans le but d'adresser cet agenda de recherche, la contribution sollicite une perspective basée sur les logiques institutionnelles. Le cas des services d'inspection de l'Agence belge de sécurité alimentaire est traité dans le but d'alimenter la réflexion sur le plan empirique. Revisitant les travaux de Michael Lipsky dans un contexte de réformes managériales, la présente contribution répond également aux appels de la littérature pour réintroduire le binôme managérialisme/professionnalisme dans l'analyse *at street-level* et pour développer une compréhension plus fine des comportements à ce niveau organisationnel.

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## Introduction

In his seminal book *Street-level bureaucracy: dilemmas of the individual in public services*, Michael Lipsky (1980/2010: 3) presents street-level bureaucrats as public workers “who interact directly with citizens in the course of their job, and who have substantial discretion in the execution of their work”. Teachers, police officers or social workers are all involved. Lipsky defines the tensions and dilemmas front-line workers have to cope with and identify the patterns of coping mechanisms and behaviors they use to respond to them. More than 30 years after its publication, his views are still very influential in the discipline of political science for examining the gaps in the implementation of public policies and, in public management, when it comes to discuss the issue of accountability at the front-lines (Brodkin, 2012; Rowe, 2012).

Lipsky did not examine the influence of the New Public Management (NPM) which began to rise in the public sector after his book was published (Hjørne *et al.*, 2010). Traditionally, street-level bureaucrats operate in a regime of bureau-professionalism organizing public services along principles of professional discretion and expertise coupled with the foundations of rational administration (Clarke *et al.*, 1994). NPM-based managerial reforms in public services have introduced new rationalities challenging these bureau-professional organizing principles. As she evokes the understudied influence of these changes upon street-level bureaucracies, Brodtkin (2012: 6) points the evolution of the dilemmas depicted by Lipsky:

“Studies have shown how the discretion that is essential to responsiveness may be squeezed out, reducing opportunities for staff to respond to client needs as they understand them (Brodtkin 2011; Jewell 2007; Lindhorst and Padgett, 2005; Soss *et al.*, 2011). In short, they suggest that the dilemmas that Lipsky first identified three decades ago have intensified”.

Challenging this latter quote, this contribution suggests that NPM-based managerial reforms have contributed to deeply modify the nature of the tensions experienced by street-level bureaucrats. Drawing on the institutional logics perspective, it suggests that these tensions cannot be restricted to a set of work pressures to which street-level bureaucrats respond to through coping mechanisms. Tensions constitute a dynamic framework mediated by two competing logics - managerial and professional - where individuals renegotiate principles of action, criteria of accountability, sources of legitimacy and, more centrally in the context of this contribution, subjectivities (Aili *et al.*, 2007). Responding to the penetration of the managerial logic in the core of practices and subjectivities, inspectors engage in an ethical response by drawing on the professional logic. As it revisits the reflection and the main concepts introduced by Lipsky through an institutional lens, this paper responds to specific calls in the literature for reintroducing managerialism and professionalism in street-level analysis, and providing a finer understanding of what underpins behaviors at street-level.

The paper first exposes the analysis conducted by Lipsky on street-level bureaucracy by emphasizing a set of concepts articulated by the author: tensions, dilemmas, discretion and coping mechanisms. Building upon the existing literature, it establishes a double research agenda aiming to examine the dynamics through which managerial reforms penetrate street-level bureaucracies, and to identify the tensions encountered by street-level bureaucrats and the way they engage with them. To operationalize such a research agenda, it then draws on the institutional logics perspective and shows how it can be deployed for serving the purpose



of this paper. The case of the inspection services of the Belgian Food Safety Agency is studied with the aim of providing some empirical flesh to the reflection. The discussion comes back on the argument put forward in this contribution and exposes the organizational challenges raised by this approach of tensions at street-level.

## 1. Street-level bureaucracy

### *Street-level bureaucracy 1.0 – Discretion, dilemmas and coping mechanisms*

Lipsky's argument is based on the idea that, due to the pivotal position they occupy between policy-makers and citizens, street-level bureaucrats produce public policies "as citizens experience it" (Meyers and Vorsanger, 2003: 154). Considering their face-to-face position with the public and the nature of their function, street-level bureaucrats enjoy significant discretion "in determining the nature, amount, and quality of benefits and sanctions provided by their agencies" (Lipsky, 1980/2010: 13). Discretion is classically defined as follows: "A public officer has discretion whenever the effective limits on his power leave him free to make a choice among possible courses of action or inaction" (Davis, 1969: 166). Lipsky underscores different sources of discretion: the application of general rules in specific cases, the people-oriented nature of judgment or the essence of specific tasks removed from direct supervision such as patrolling or teaching (Vinzant *et al.*, 1998: 40). Discretion has to be considered in a specific context. This refers to the Dworkin's (1978: 31) analogy of the doughnut, asserting that discretion is always circumscribed by a "surrounding frame of restriction" including rules (statutes, directives, guidelines), values (codes of ethics, codes of conduct, professional values) as well as tasks and clients attributes (Scott, 1997; Taylor and Kelly, 2006; Hupe and Hill, 2007).

Lipsky presents the particular pressurizing work conditions of street-level bureaucrats; lack of resources, overburdening workload (demand for services overtakes the supply), vague and ambiguous objectives, non-voluntary clients and complexity/impossibility to measure performance. These work conditions generate dilemmas for front-lines officials. Hjörne *et al.* (2010: 304) summarize these "tensions between different principles, aims and demands that are inevitably present and being dealt with in the mundane street-level work in order to find pragmatic ways of making the conflicting practices meaningful and accountable". The first dilemma opposing autonomy and control is bounded to the nature of street-level interactions with clients. Lipsky observes the tensions between street-level workers and their managers: "managers are interested in achieving results consistent with agency objectives" while street-level bureaucrats "are interested in processing work consistent with their own preferences", that is, in Lipskian terms, containing pressures, avoiding stressful situations and maintaining autonomy (Lipsky, 1980/2010: 18). The second dilemma puts street-level bureaucrats at the crossroad of two regimes of accountability both to organizations and clients: "The fundamental service dilemma of street-level bureaucracies is how to provide individual responses or treatment on a mass basis" (Lipsky 1980/2010: 44). The third dilemma opposes demand to supply; it forces street-level agents to perform with short resources compared to the high clients' demand for services. To deal with this pressurizing work environment, street-level bureaucrats deploy coping mechanisms depicted as these "general responses officials develop to deal with the challenges brought about by inadequate resources, few controls, indeterminate objectives, and discouraging circumstances" (Halliday *et al.*, 2009: 406). Winter (2002: 3) describes them as these "tricks" used by front-lines workers through conscious or subconscious strategies to deal with these pressures inherent to the nature of

their activities. The finality of these “survival mechanisms” is to reduce work pressure and increase preferences (Lipsky, 1980/2010: 187). They take various forms. Rationing services is about managing demand for services; queuing, paperwork, routines or time consuming procedures are developed for facing the lack of time and resources (Winter, 2002). Client-processing contributes to classify clients and determine the types of service they receive; creaming can be such a technique via which bureaucrats “choose (or skim off the top) those who seem most likely to succeed in terms of bureaucratic success criteria” (Lipsky, 1980/2010: 107). Coping mechanisms also include husbanding resources (transfer of cases, pretending full capacity of workload), screening (receptionists, procedures) or rubber stamping (classification of clients).

The analytical perspective deriving from street-level bureaucracy has been drawn on for understanding the conditions and work pressures experienced at the front-line, and the determinants of their behaviors at the front-lines. The New Public Management and the introduction of NPM-based public sector reforms at street-level have pushed scholars to question their impact upon front-line discretion and behaviors.

### *Street-level bureaucracies 2.0 – The rise of NPM-based managerial reforms*

Street-level bureaucrats traditionally operate in a particular administrative context depicted by Clarke and Newman (1997) as bureau-professionalism. This dominating logic is based on “professional expertise coupled with the regulatory principles of rational administration as the means of accomplishing welfare” (Clarke *et al.*, 1994: 22). At the cross-road of expertise and administrative procedures, it promotes discretion through professional judgment in the application of rules and standards, and the freedom to categorize and treat service users:

“This combination of administrative rationality and professional expertise guaranteed the ‘neutrality’ of the welfare state and protected the exercise of professional judgment in the delivery of social welfare (Newman, 1998: 235). They have the kind of discretion normally associated with doctors or lawyers in private practice. But, because they operate within a hierarchical organization, they are, at least nominally, supposed to exercise that discretion according to the standards and values of their hierarchical superiors” (Piore and Schrank, 2008: 9-10).

As Terpstra and Havinga (2001: 105-106) paraphrase, in such a regime, rules are seen as a framework rather than procedures that need to be strictly applied; if they consider that their application may jeopardize policy outcomes, public agents may deviate from them. Identities and attachment are anchored in both the department of the organization and the professional groups to which they belong. As a corollary, hierarchal systems reflect different status within and between professions while valuing expertise and experience as source of authority” (Clarke and Newman, 1997).

The New Public Management first developed in the UK and in the USA in the early 1980's and profoundly affected the governance of Public Services (Osborne and Gaebler, 1992; Dunleavy and Hood 1994; Barzelay, 2001; Pollitt and Bouckaert, 2004). Associated with the “Managerial State”, managerialism is referred to as a discourse or an ideology connected to the ‘spirit’ of the New Public Management (Clarke and Newman, 1997). It is anchored in the “effort to displace or subordinate the claims of professionalism” and to put managers as the people in charge within public organizations (Pollitt, 1993; Clarke *et al.*, 2000: 9). Promoting

a new rationality challenging bureau-professionalism, managerialism aspires to efficiency and accountability as the “discipline necessary for efficient organisation, particularly in relation to welfare professionalism’s claims to exercise discretionary judgment” (Clarke and Newman, 1997: 30). It draws from its ideological sources some sense of mistrust vis-à-vis professional discretion that economic incentives and performance management are expected to contain (Terpstra and Havinga, 2001; Farrell and Morris, 2003; Fitzgerald, 2008). The discourse materializes through three dimensions constitutive of this agenda of reform: competition, performance and management (Ferlie *et al.*, 1996). Beyond competition aiming to break down the rigid and inflexible hierarchy promoted in the Weberian ideal-type of bureaucracy (Dunleavy *et al.*, 2005), performance derives from expectations in terms of accountability, efficiency and effectiveness (Noordegraaf and Abma, 2003; Thomas, 2006). It can also be seen as an organizational levy for control replacing bureaucratic instruments based upon rules and hierarchal supervision. Finally, managerialism broadly refers to the development in the public sector of management techniques promoting productivity, efficiency, excellence, customer satisfaction, accountability, performance or quality (Pollitt, 1993; Muller and Carter, 2007).

What happens to professional discretion at street-level in these emerging NPM-based reforms? Undermining the Lipsky’s thesis on discretion, some argue that street-level bureaucrats are forced to abandon their discretionary margin of action as their ability “to effectively make or become the policy they carry out has been significantly reduced” (Taylor and Kelly, 2006: 639). This statement goes along with a first set of contributions considering this managerial shift as synonym of decrease in discretion at street-level due to the development of new dispositifs of control, procedures and information technology (Howe, 1991; Harris, 1998; Bovens and Zouridis, 2002). This argument rests on the following assertion: “It could be claimed that the invasion of managerialism into welfare work solves the three dilemmas of great importance for social welfare work in a way that is unfavorable to both service users and professionals” (Hjörne *et al.*, 2010: 306-307). Another argument opposes that NPM-based public sector reforms have not managed to completely steer discretion (Baldwin, 2000; Evans and Harris, 2004; Taylor and Kelly, 2006; Brodtkin, 2008; 2011; Ellis, 2009; Wastell *et al.*, 2010). Research shows how street-level bureaucrats manage to adapt or to resist to managerial influences to maintain discretion. These two opposing arguments are summarized by Evans (2010) in two contrasting perspectives to approach the impact of managerialism on street-level discretion and behaviors.

The domination perspective postulates an ineluctable displacement of power and considers that managers, committed to organizational hierarchy and goals, have entire control on professionals (Clarke and Newman, 1997; Broadbent and Laughlin, 2002). It approaches managerialism as a conclusion, as a matter of fact relating the completion of this shift of power. From this point of view, discretion is envisaged in terms of ‘how much it has been downgraded by managerial logics’ and research questions aim to locate these remaining and isolated pockets of discretion retained by professionals. By contrast, the discursive perspective adopts a different posture, presenting “managerialism as an ‘emergent culture of control’ which is changing, overlaying and altering existing professionalized structures, rather than replacing them; but within which actors are not seen as simply passive; they are also able to resist and challenge and subvert managerialism” (Evans, 2010: 50). The managerialist discourse coexists with professional principles for action. The discursive perspective addresses behaviors at the front-lines as being reshaped rather than suppressed

while regarding street-level workers as constituted by professional and managerial logics of action.

Rather than having ripped up the foundations, managerial discourses have been laid down upon previous ways of working. In some settings, they penetrate further than in others, but people can remember the way things were done before and use this as a source of critical judgment. There is a plurality of discourses. Some may be more compelling than others. Actors are confronted with choices, not inevitabilities (Williams, 1993). They may be faced with situations where a powerful discourse simply doesn't correspond with their experience or commitments, and they have to choose what to do. (...) Choices may also be painful, where the position taken by the actors contradicts powerful interests. But the struggle and discomfort do not remove the choice. This, perhaps, explains the discomfiture of discretion (Evans, 2010: 63).

Evans' discursive perspective thus provides an interesting way to discuss the influence of managerial reforms at street-level. Penetration echoes the mechanisms with which reforms infiltrate the organization. How does penetration occur and how does it affect street-level bureaucrats? The literature on professions can be relevantly drawn on as it has shown the complex arrangement between internalization and resistance in the following of managerialism (Thomas and Davies, 2002; 2005; Gleeson and Knights, 2006; Mackey, 2007; Acroyd *et al.*, 2007; Noordegraaf, 2007; Thomas and Hewitt, 2011). The idea of 'discomfiture' is also pivotal as it echoes to coexistence of managerialism and professionalism at the front-lines where "diverse sets of beliefs and values are embedded in dynamic organisation structures and processes" (Ferlie and McNulty 2004:1394). As professionalism and managerialism coexist, they produce tensions that manifest via conflicting expectations or contrasting normative referents for front-line workers (Aili and Nilsson, 2007; Emery, 2006). What is the nature of these tensions? How do street-level professionals handle these tensions? There lies the key questioning of this contribution. More importantly, it suggests a new angle for approaching the tensions that prevail at the front-lines in a more contemporary context taking into account the wave of reforms.

Despite rare recent examples and calls (Evans, 2010; Ellis, 2011), the articulation between professionalism and managerialism has been significantly neglected in the literature on street-level bureaucracy. Although it is observed that front-line agents operate in micro-networks of interactions transcended by multiple institutional regimes (Hupe and Hill, 2007), not much attention has been paid to the impact of these complex institutional context and the way they are responded by street-level agents (Evans, 2010; Ellis, 2011; Rice, 2012; Garrow and Grusky, 2013). Furthermore, although existing studies have paid attention to various isolated factors weighing upon front-line behaviors, they fail to investigate the mechanisms through which these dimensions influence front-official turning the street-level research tradition into "factor studies rather than process studies" (Loyens and Maesschalck, 2010: 91). The reason for not questioning such mechanisms probably lies in the positivist quantitative research tradition, or in the domination of rational choice and principal-agent theories in the literature on street-level bureaucracy (Silbey, 2011; Piore, 2011; Garow and Grusky, 2013). Street-level bureaucrats have been studied as driven by their interest and preferences determined by their organizational context (goals, rules, incentives, budgetary and time resources) and utility function (Loyens and Maesschalck, 2010; Rice, 2012). The following section pushes the reflection further by showing how the institutional logics perspective may contribute to operationalize the agenda presented in this section.



## 2. Re-thinking street-level bureaucracies as an arena of competing institutional logics

The institutional logics perspective constitutes a meta-theoretical framework that can be relevant for fulfilling such a research agenda (Friedland and Alford, 1991; Thornton *et al.*, 2012). Thornton and Ocasio (1999: 804) define institutional logics as “the socially constructed, historical patterns of material practices, assumptions, values, beliefs, and rules by which individuals produce and reproduce their material subsistence, organize time and space, and provide meaning to their social reality”. Prevalent in this definition is the dualism of logics – its material and symbolic nature – considered as two sides of the same coin (Delmestri, 2009; Reay *et al.*, 2009). Logics guide behaviors by framing what is legitimate, diffusing expectations for social relations and behaviors, orientating the perception of rationality, shaping identities and providing rationales for decision making and action (Marquis and Lounsbury, 2007; Goodrick and Reay, 2011). This contribution is interested in how a managerial logic penetrates regulatory street-level bureaucracies. Based upon Hasselbladh and Kallinikos (2000), it is suggested that logics diffuse within organization through objectification via ideals, discourses and techniques of control, and subjectification via social roles. Such a fertilization of the institutional logics perspective is not new but allows ‘visualizing’ how logics becomes engrained within organization (Dick and Hyde, 2004; Moquet and Pezet, 2006; Dambrin *et al.*, 2007; Dambrin and Pezet, 2009; Labatut *et al.*, 2012; Daudigeos *et al.*, 2012).

Hasselbladh and Kallinikos (2000: 706) refer to ideals as providing general orientations framing a domain of activity and providing the core principles underpinning social relations. Turning ideals into sets of relationships and causal associations, discourse express a more precise and elaborate version of ideals as they “single out a domain of application, define the relevant goals to be accomplished and the roles involved, spell out the criteria of truth and designate causal theories and schemes of action and interpretation”. Ideals and discourses are seen as critical vectors for grounding and diffusing institutional logics within organizations (Green *et al.*, 2009; Spicer and Sewell, 2010; Phillips and Oswick, 2012). Discourse contributes to the production of subjects by defining appropriate conducts, informing social practices, promoting ways of thinking and providing social identities (Phillips *et al.*, 2008). Alvesson and Karreman (2000: 1127-1128) provide a calibrated view on discourse: “Language, put together as discourses, arranges and naturalizes the social world in a specific way and thus informs social practices. These practices constitute particular forms of subjectivity in which human subjects are managed and given a certain form, viewed as self-evident and rational”. Institutional logics are also objectified and diffused through dispositifs of control (Morales and Sponem, 2009; Terrisse, 2012). Techniques of control are numerical and codified systems of documentation and measurement through which discourse shape subject-object relationships via “calculation, reflection, comparison, manipulation contributing to the social embeddedness of categories of the discourse” (Hasselbladh and Kallinikos, 2000: 706). Eventually, Hasselbladh and Kallinikos (2000: 712) depict subjectification as shaping forms of actorhood understood as “the way actors understand themselves and their roles”. Subjects are historically constituted by the modes of objectification present in their environment; subjugation echoes the colonization of subjectivities by discourse and techniques of surveillance (Bergstrom and Knights, 2006; Mennicken and Miller, 2012). Simultaneously subjectification is associated with the activity of self-construction where subjects constitute themselves as ethical subjects (Foucault, 1984). Underlying this reflection is the rejection of a totalizing reading of subjectification: “Employees are not passive

receptacles or carriers of discourses but, instead, more or less actively and critically interpret and enact them” (Alvesson and Wilmott, 2002: 628).

Secondly, the institutional logics perspective allows seizing the consequences of such an infiltration by pinpointing the new tensions it may generate. Scholars have recently observed that multiple logics could coexist for a lengthy period of time without one monopolizing the institutional space (Battilana and Dorado, 2010; Goodrick and Reay, 2011). This echoes the idea of institutional pluralism designating the situation of “an organization that may have multiple institutionally-given identities, an organization that may be the structural embodiment or incarnation of multiple logics, an organization that may be legitimated by multiple mythologies and an organization wherein very different beliefs and values might be simultaneously taken for granted” (Kraatz and Block, 2008: 244). Recent but rare contributions have focused on intra-organizational dynamics of how actors engage with coexisting logics. Considering identity as pivotal for grasping the articulation between logics and individuals, Lok (2010: 1305) observes that actors both internalize and resist new logics along three different processes: they use identity and practices imported by the new logic to reinforce the preexisting logic, they pragmatically conserve preexisting practices and identity, and they maintain an autonomous identity while using the practices diffused by the new logic. Authors note how institutional contradictions entailed by competing logics can be painfully experienced by marginalized actors striving to engage with such identity transformation: “This experience was often highly emotionally charged, indicating that these contradictions were embodied or ‘lived’ rather than merely cognitively experienced” (Creed *et al.*, 2010; Hallet, 2010). In this context, discourses, techniques of control and subjects can be seen as the ‘surface’ reflecting the crystallization of the competition of logics. Rejecting universal and absolute truth, ideals and discourses can be seen as multiple and coexisting within a same social space (Caldwell, 2005). Research has shown how the behaviors and subjectivities promoted by dominant discourses can be resisted through the recourse to alternative discourses (Fleming and Sewell, 2002; Spicer and Böhm, 2007; Mumby and Mease, 2011). Same observations can be expressed when it comes to dispositifs of control. Along with scholars such as Hatchuel and Weil (1992), Terrisse (2012) envisages institutional logics are nested within these managerial instruments and techniques of control constituting an arena for the crystallization of conflicts and tensions. Dick and Hyde (2004) stress how frictions between logics may be experienced at individual level: “The contradictions between logics, described and articulated by Friedland and Alford (1991), can be understood as representing conditions of possibility for the emergence of subjective conflict, and hence of the politicization of these contradictions”.

### **3. Methodology and presentation of the case**

With the aim of addressing the influence of managerial reforms at street-level through the prism of such an institutional research agenda this empirical part of this contribution examines the case of street-level bureaucracies in charge of risk regulation. Frontline regulators are public agents responsible for the enforcement of regulatory standards (Pautz, 2010). They draw their professional expertise from their knowledge of the sector they regulate (food safety, occupational safety, building safety, etc.) and from their experience on how to foster compliance. Front-line regulators traditionally dispose of a broad margin of discretion in their action at the front-line: “Like most of street-level bureaucrats, inspectors can be alternatively informative, cajoling, educating or punitive as needed to produce the

desired levels of cooperation and compliance. (...) inspectors are classic examples of the street-level bureaucrats" (May and Wood, 2003: 118).

Created in 2000, the Belgian Food Safety Agency is a federal para-statal organization in charge of ensuring the safety of the food chain. Its legal mission is to guarantee the safety of the food chain and the quality of food products in order to protect the health of humans, animals and plants. The organization is composed of 1327 staff members, 723 of which in charge of inspections for approximately 180.000 food operators. In 2011, the Agency realized 171.552 inspections conducted among 41.121 food operators. The Agency is structured by four Directorate General: DG General Services, DG Laboratories, DG Policy of control and DG Control. The latter DG is constituted of the inspection services. The DG Control has two internal directions. The Direction of Central Administration is in charge of the technical support. The Regional Direction is in charge of the managerial coordination via two regional directors active for the French-speaking and Flemish-speaking areas. The regional directors are assisted with the National Unit of Implementation and Coordination which is in charge of internal control, audits, human resources and external collaboration. Inspectors are geographically spread in Units of Control (UC) covering specific territories. A UC is headed by a Manager assisted by three sectoral managers each responsible for a vertical sector: primary production, processing and distribution. The UC that has been examined in this case study is composed of 60 staff members: 19 inspectors (master degree), 25 controllers (bachelor degree) and 17 administrative staffs. Beyond the difference in salary and specialization, agents carry out similar missions: controlling regulatory compliance and gathering samples. Professional backgrounds vary between inspectors (veterinarians, bio-engineers, industrial engineers) or controllers (dieticians, chemists, bio-chemists). The allocation of workload is given by the annual planning of control via which inspectors are attributed the lists of food operators to inspect in a geographic area. Inspectors mainly operate on their own although, on difficult cases where inspection may last longer or where the operator may become violent, they can be assisted by one of their colleagues.

The case selection is anchored in an instrumental perspective giving the opportunity to apply the reflection held in previous sections "in a suitable context" (Punch, 1998; Bryman, 2004: 51). The Agency has engaged in managerial reforms since 2002 which allows examining the tensions experienced by inspectors in a context where reforms have been implemented. Data collection has gathered a significant amount of primary and secondary sources for substantiating discourse analysis: organizational documents, press articles, talks and conferences (See Appendix 1). 21 semi-structured interviews were also conducted. A first round of interviews was conducted at the level of the top-management of the Agency and of the Directorate General Control. A second round was conducted within a Provincial Unit at the level of the management, sectoral management and inspectors (See Appendix 2). Interviews were recorded and transcribed before being coded with NVivo 7 via analytical categories that were determined with regard to the theoretical reflection. As suggested by Graham (2005), discourse analysis was conducted by reassembling key sets of statements and identifying normative assertions and subject positions (the 'good' inspection and the 'good' inspector). In order to seize the penetration of these reforms and to assess the tensions they may generate, data were examined through pattern-matching along with the different steps described in previous sections (Yin, 2009).

## 4. Case Study – The Inspection Services of the Belgian Food Safety Agency

### 4.1. *The situation before the Agency: The Reign of bureau-professionalism*

Before the creation of the Belgian Food Safety Agency, food safety inspection was carried out by different administrative entities covering specific segments of the food chain. The Ministry of Agriculture and Middle Classes was operating via the Veterinary Inspection and the Inspection of the Quality of Animal Products. The Ministry of Public Health was operating via the Institute for Veterinary Control and the General Food Inspection. These entities were anchored in different mentalities of inspection driven by different views on regulation and various conceptions on how to interact with food operators. These services had their own philosophy, tools, procedures and ways of approaching the inspection process.

*There were people with completely different cultures. There were food services which already worked with check-lists and which had a repressive attitude. There were people who focused almost exclusively on vulgarization. (CEO)*

Expertise and purposefulness were central and measures taken at field level were determined by professional discretion and judgment. Inspectors working in the lap of the Ministry of Agriculture were oriented to an advice-based style of inspection and, as they tended to be reluctant to opt for repressive attitudes, were also disposing of a great margin of discretion in their actions. Although its agents were disposing of a large margin of professional discretion in the conduct of inspections, the General Food Inspection had a more coercive style and was deploying formalized instruments guiding the process of inspection at the front-line via more or less formal forms of check-lists and procedures. In their review of the functioning of these inspection services, Ponsaers and his colleagues (2003) show the strong differences between inspection services. Practices were different in terms of sanctioning. At the Institute of Veterinary Control, inspectors were given broad discretion as the choice of sanction was left to their judgment. At the Veterinary Inspection, sanctions were depending on the nature and the reasons of non-compliance. Despite these differences, these services were active in terms of advice during or after the inspection process. It is also interesting to note that uniformity in inspection was addressed in different fashion across these services. Whereas the Institute of Veterinary Control had no specific measures for promoting uniformity, the Veterinary Inspection and the General Food Inspection were both organizing sectoral discussions around specific cases or situations between inspectors at sectoral level in order to share practices and increase the comparability of inspections. In any case, the discretion and the judgment of inspectors were prevailing when it came to conduct inspection both in terms of process and sanctions.

*We also based our decision on legal texts but it was more, I'd say, left to the appreciation of the controller. One day, you go to work but you are not well disposed, you don't leave anything out and then, on another day, you are in a good mood so that you only make a comment without taking any action. (Inspector 1)*

*There was no generalization of the measure according to what was observed neither as the judgment of the controller prevailed most of the time: "Ok for this time. I will only give him a warning". (Inspector 4)*

### 4.2. *The introduction of managerial reforms: Objectification through discourse*

Three distinct periods in the penetration of discourse have been unearthed through analysis. The first period (1994-2002) is marked by the emergence of a new set of statements in the following of the Dioxin crisis and the Copernicus Reforms aiming to modernize the federal

public services. After the crisis, the critiques expressed against the functioning of existing inspection services point the pitfalls of bureaucracy by contrast with the methods of "modern management". The conclusions of the Parliamentary inquiry commission in charge of drawing the lessons of the Dioxin crisis point the weight of the bureaucratic administrative system: ineffective lines of communication, organizational culture lacking of a sense of modern public management as well as lack of transparency and accountability. These conclusions amplify the critiques on the objectivity and the independence of inspectors while pinpointing the deficient management of inspection services.

The public officials put on that case sometimes adopted a much more "administrative" work method based on a classic bureaucratic model. Communication strictly followed the official channels and was frequently formalistic. A certain number of important actions were a lot delayed because of that. The general culture within this kind of administrations, culture characterized by too little sense of modern management, has also had the effect that the different services did not demonstrate enough open-mindedness and did not collaborate enough. The involved general public officials are mainly responsible for this lack of flexibility, rapidity, transparency between the services. (Inquiry Commission, 2000)

These conclusions interpenetrated the foundations of the Copernicus reforms engaged at federal level. These reforms aim to introduce a profound cultural change in the public sector with the aim of breaking down the bureaucratic machineries along with the principles of accountability, autonomy, efficiency and effectiveness promoted by the NPM. The conjunction of these two events has made possible a reversal in the order of discourse on food inspection. Uniformization and accountability emerge as key dimensions going along with the priority of integrating services into a modern Agency for guaranteeing food safety. That is in this context of distrust vis-à-vis public authorities and inspection services that working groups initiate the creation of the Food Safety Agency following the recommendations of the inquiry commission. "The idea of the agency has been referred to at the top of the crisis, because the notion of agency associated to the values of efficacy, responsibility and participation, beneficiates of an undeniable attractiveness" (Zwetkoff, 2000). The discourse produced by the working groups in charge of its theorization and its conceptualization are revelatory of the foundational principles that will underpin the future Agency. The challenge for these groups resides in the preparation of the effective integration of the multiple inspection services into an integrated organization while taking into the principles of the Copernicus reforms in a climate that contributes to restore public trust (Consultation Change Management, 2002). Documents reporting the progress made by these groups highlight the importance of uniformization to guarantee the integration and the legitimacy of inspection services. This project responds to the ambition to create an Agency in charge of control in the food chain which contrasts with the regime prevailing before the crisis where a part of inspection services were mainly oriented to advice, pedagogy, counselling when being reluctant to use sanctions. Therefore, uniformization, harmonization and standardization are connected to efficacy. Along with the NPM-based principle of accountability promoted through the Copernicus Reform, reports point the importance of qualitatively fixing, monitoring and evaluating objectives of inspection. Quality management and audits are coined for the attainment of these objectives.

*Almost since the beginning of the Agency, there was a will to wonder: "How can controls be driven the same way in west Flanders and in Luxemburg? How can we make sure that an operator, whoever he or she is, from whatever sector, is controlled the same way, has the same constraints, the same obligations and the same rights, regardless of the place he/she lives and the sector in which he/she works, while...and that was the real challenge...preserving a certain level of flexibility. (Director Technical Administration)*

This uniformity should be extended to all segments and to all levels: there cannot be a difference in *approach* by the *different* UC, by the different sectors attached to the UPC and by the controllers and the inspectors individually. (Activity report, 2003)

The second period (2002-2006) reveals statements that operationalize this shift. In 2002, the Agency is created. The priority is put upon the integration of inspection services. A Business Process re-engineering is initiated to review and rationalize all the organizational processes including those for inspection. The BPR generated nine programs of improvement including the development of a quality management system, the improvement of the methods of inspection and an integrated IT system.

Food@work is the BPR project that has been implemented in order to improve and rationalize the *functioning* of the *FASFC*. We can describe the BPR as a deep review and modernization of the organization process with the aim of improving substantially the services. (Activity report 2005)

In discourses, the keystone ideals put forward after the crisis are conceptualized further, justified and made operational. Uniformization is linked to productivity, flexibility, evaluation and standardized procedures. Why is it so important for the Agency to standardize inspections? Various forms of legitimization are found. It is legitimized by the surveys conducted among the 'clients' of the Agency and their expressed willingness to dispose of harmonized inspections. Beyond the increase in professionalism and the administrative simplification uniformization is supposed to bring, another key element is certainly the signal that standardization sends to regulated entities in terms of equity of treatment. The underlying assumption is that operators are more likely to comply if they perceive that they are treated – and sanctioned – the same way as the others. Standardization is correlatively supposed to increase to social acceptability of inspection. Also noticeable is that standardization englobes the process and the result of inspection (the output of inspection must be leveled across the regions and sectors). The objective is not to perform outstanding inspections but to guarantee a homogenous quality for motive of social acceptability. Along the same lines, accountability is presented as crucial for the Agency in order to prove its social utility and the achievement of the main objectives in terms of food safety. Uniformization and accountability are thus deeply intertwined and exposed as critical for the quality and efficacy of inspections.

*Equity because, at the beginning, the leitmotiv of people we controlled was, at first: "it's not ok, one guy is very strict, and another isn't". People in restaurants in different provinces or in factories can make the comparison.* (CEO)

*I always say that the Agency will have a large support, including from the political side, if it is well integrated into society. In that perspective, it must prove its utility and efficiency every day to the consumers and "clients" and stay acceptable for the food chain's actors, including SMEs and farmers.* (CEO, Agency's newsletter, 03/2007)

In the third period (2007-2013), the challenge for the Agency is to implement the projects launched by the BPR throughout the whole organization while engraining these new principles in the daily life of inspectors. The Agency implements a quality system that is certified ISO 9001 and ISO 17020. Quality is exposed as a "way of thinking" and as part of a continuous process in which the Agency is engaged. Uniformization, standardization and objectivity are now integrated in the discourse on quality. It is depicted as a leitmotiv that infiltrates all the processes of the organization and becomes engrained in Agency's activities and that take ubiquitous properties when it comes to define day-to-day operations at organizational and individual levels. Furthermore, the discourse on quality integrates



managers and inspectors in a sphere of constant questioning and self-interrogation on whether the system can be ameliorated in terms of effectiveness and efficiency. One can notice the never-ending situation of 'steady change' supposed to maintain inspectors alert in improving quality.

These objectives, which are of course in line with the General Quality Policy of the Agency established by the Managing Director, are of course not the final outcome of our commitment. The aim must be to *extend* our way of thinking and to apply "quality" to all activities of the Control Administration; the scope will therefore be extended to other application areas. (Quality policy declaration – DG Control, 2012)

In terms of accountability, performance management and its development at individual level is underpinned by motives of an "objective logic of productivity" and in a posture of continuous improvement. In the continuity of the shift initiated in the previous phase, the recourse to figures and quantitative measures to legitimize the performance of the organization is increasing both in official documents and in the media.

Every year, objectives for the provincial services of control are defined and an evaluation is carried out based on the selected performance indicators (KPI) including a number of measurable parameters *when* accomplishing missions, such as time and distance. Both quality and productivity are definitely targets to be achieved in inspections. (Activity report 2009)

Legitimacy and image are long-lasting objectives of the Agency which have become more and more prevalent in recent years, notably in the following of the satisfaction survey made among consumers. This imperative takes a specific connotation for the Agency as it aims to get rid of its repressive image in favor of a more human one. The Agency aims to convey a more humane image of its inspection services as sensitizing, lifting up food operators and acting "humanely". The image of the inspector that circulates in the press is imbued with such humanity expressed through personal experiences, feelings and anecdotes; they are presented with a picture of themselves in action, special boxes exposing their professional background and their personal experience of the job, their experience of interactions with operators or their vision of their mission as keeper of food safety. Paradoxically, the discourse analysis reveals how the inspection process has been de-personified on the altar of uniformity and objectiveness while considering subjectivity as implicitly abnormal. This is utterly expressed when the Agency is criticized in the press. Inspection services are said to be inconsiderably inflexible in the way regulatory norms and standards are applied while lacking of consideration for the particularities of, for instance, small food operators. They are also reproached to be inconsistent in the way inspections are conducted. When responding to these critiques, the Agency refers to the objectivity obtained via quality management systems and the standardization via procedures. The inspector has been removed from the discourse as what is put forward is the uniformity of the system. Discretion is seen as residual and subjectivity as something 'inevitable' in a human system of risk regulation.

Some restaurant owners criticize the application of norms that are too uniform... CEO: ten years ago, *we were being* criticized for the exact contrary. Our controllers work with standardized "check-lists" which allow for more objective controls. (Le Soir, 2012)

Defending its employees, the CEO adds: "FASFC's controllers act like professionals, as proven by the *external* audits *which* led to the ISO accreditation 17020 of the inspection services. Standardized procedures make it possible to guarantee a uniform approach between controllers and the provincial unities of control. At the end of an inspection, the inspector

properly informs the farmer by systematically giving him a report stating his findings". (Sud Presse, 2013)

Across these periods, the emerging discourse establishes two ideals as 'criteria of truth' for ruling inspection: uniformization and accountability. Both the Dioxin crisis and the structural wave of managerial reforms at federal level have been critical in creating the conditions for this change in the order of discourse. Ideals have been progressively operationalized contributing to discursively wrap up inspection into principles including quality, result-orientation, efficiency, productivity or performance. These criteria contrast with those prevailing before the Agency where discretion, expertise, experience and professional judgment were seen as the criteria ruling and legitimizing action. The emerging discursive formation is accompanied with a new subject position presenting inspectors as operating in a uniform and harmonized manner while being accountable to objectives and performance indicators. Inspectors being at the front-line of the organization, they are expected to concur to the improvement of its image. An increase has been observed of the statements specifying and objectifying how to behave and how to inspect in an appropriate way. This transcends with the original subject position which was legitimizing the figure of the inspector enjoying discretion and mastering the evaluation and sanction process through the prism of its judgment and its service tradition. Criteria of normality have shifted. A new subject position has emerged. A new discourse has penetrated the organization.

#### 4.3. *The introduction of managerial reforms: Objectification through techniques of control*

##### *Uniformization and accountability through process: Check-lists*

Check-lists constitute a central instrument operationalizing the discourse on uniformization. Their creation is associated with the limitation of the variability of behaviors at the front-lines. Check-lists are defined as "a work instrument that includes a complete inventory of the items to be checked and that is completed by inspectors on the basis of their observations" (Agency's Glossarium, 2007). In 2007, check-lists have been harmonized further by the introduction of weighting. Weighted check-lists attribute a measurable importance to the items to be controlled and automatically provide the result of the inspection via a percentage of non-conformity which determines what measure must be taken. If inspectors estimate that the ultimate decision determined by the check-list is exaggerated or not coercive enough, they may decide to 'diverge' under specific conditions. Standardization is currently being processed further through the systematic collection of motives of divergence with the aim of determining those seen as acceptable and those which are not.

*If, in one province, you have 50% of people with a different opinion and in another one, 5% because the guys of the inspection are more severe, you have no harmonization and thus, no equity in the way controls are processed. (CEO)*

*In order to obtain this harmonization, I'd say, inevitably in a relatively military way if one can make a comparison. It's well structured, well organized. Tools and procedures are strict. They are closed procedures with check-lists. Out of the blue reports don't exist. Controllers don't go to operators' saying "What interests me is that" and another one to say "What interests me is this". No. It's very much structured; even the measures taken afterwards are structured. You have mainly procedures but you have for instance 100 questions and starting from a certain percentage, we receive a warning or starting from another percentage, what you receive is a procès-verbal. It has nothing to do with the controller's mood or the fact that got up on the wrong foot. You will receive a procès-verbal or a warning. (General Director DG Control)*

Check-lists are well-entrenched in the normal functioning of inspection services. They have become a pivotal instrument that plays a crucial role in inspection both internally as it has become the support for reporting inspections, and externally as it has become a tool legitimizing and proving the objectiveness of inspections. They are valued by inspectors and middle managers as they contribute to favor uniformity, which is experienced as positive in the light of the equity of treatment it generates for food operators. While check-lists are exposed as a pedagogic instrument and an effective reminder for inspection, they are also used by inspectors to justify and de-personify sanctions. These elements have progressively contributed to make acceptable the loss of professional discretion. However, a first tension resides in the fact that the remaining margin of professional judgment that underpins the use and the application of the check-list contributes to rationalize and force judgment into a binary framework. Check-lists contribute to put professional judgment in a box, which leads inspectors to come up with results of inspection that contradict their professional judgment.

*So, what does the check-list system consist of? The check-list is a questionnaire like this one with a part "good" and a part "not good" which is always a bit annoying. Also, the question is not applicable. And then, there is this weighting thing according to the importance of each question. (...) I'm told: "Sunday, we were overwhelmed for this or this reason". Well. On the whole, it is still a good thing. We can even say it's a very good thing but there is a small shortcoming: it's not necessarily a good thing when my check-list only proposes two solutions: black or white. I'll have no other choice than black even though I think it's more mitigated... more of a "grey" kind of case. (Inspector 4)*

Even if divergence is still possible, it is limited to some specific cases of inspection, it must be validated by the hierarchy and the individual frequency of divergence is monitored via KPI's. Diverging is interesting as it literally means detaching oneself from the rest of the group and, in this case, from a standardized system. Diverging – using professional discretion for determining the result of an inspection and contradicting the check-list – is not a natural process considering it is closely regulated by the organization. Diverging is becoming abnormal inducing that exercising professional discretion also is. Pleading for the maintaining of the 'right to diverge' as a normal practice of inspection puts some inspectors and UC's managers in opposition with their hierarchy.

*That's the reason why I'm sometimes in an awkward position regarding the inspection procedure because when we carry out a second control, we cannot take diverging measures. When I carry out a second control, I see the path that has been covered and, even if it still isn't 100% perfect because we say that 80% of nonconformities must be resolved. I've been in that case where 80% of nonconformities haven't yet disappeared but I judge my report favorable with a comment because I know where we come from. (...) We talked about it with our Director General; we totally disagree but I decided to keep working as I've always done. (Inspector 2)*

Secondly, inspectors tend to have a critical look at the ever-growing centrality of check-lists in the process of inspection and plead for taking critical distance vis-à-vis what should "remain an instrument". This is interesting as it contributes to inverse the relationship between the inspector and the check-list; as it was before considered as a facultative tool that inspectors were occasionally using, the question is now formulated in terms of how to maintain the subjective input of the inspector in the framework given by the check-lists. Check-lists occupy the centre-stage. Some inspectors re-appropriate themselves the check-list through the prism of expertise and experience for avoiding being put on 'automatic' tracks or losing the global picture of an inspection. This constitutes a resistance to the natural tendency of automaticity and centrality of check-lists.

*The danger with this is that we can miss the point. It's like not seeing the wood for the trees. It's my personal opinion even though I find it's a great tool and I think the positive is still... (...) Let me tell you, if in my check-list one question is missing, no one will notice it! You understand? That's the problem. Once you've been given so closed-questions, you no longer check elsewhere... (Manager)*

*It's good to know what has to be verified but it has some disadvantages. There are things we could verify but we don't because we limit ourselves to the check-list, for example. Mainly in the primary sector, that irritates me. Well, check-lists are not always well-made. That's the reason why we work to improve them. Otherwise, it's a tool. I find regrettable that this tool became 'THE' essential tool so that a control is only effective when we have used the sacrosanct check-lists to do it. (...) To me, it's a simple tool, I find it takes too much space in our work. (Inspector 2)*

Thirdly, a form of tension emerges between a conception of the check-list as an automatic and standardized instrument going across the context of food operators – in terms of socio-economic conditions for instance – and a view of inspection that must be tailored to contextual variables to take effective measures. Taking the context into account in inspections and considering the possibility to advice operators is seen as a form resilience vis-à-vis the inflexible inspection style that is implied from check-lists and promoted by the Agency. Both the effectiveness of inspection and the humanity of the inspector are mentioned as justification.

*I believe that if you work in a big company, you have the means to do your job correctly and that if you don't, then you get a procès-verbal, that's it. They have the means, they have... (...). While in the distribution sector, the situation should be taken more into account? Yes, that's it: the person is alone, the ignorance, etc. Is it important? Yes, I believe it to be very important, we have to remain human. (Inspector 1)*

#### *Uniformization and accountability through process: Quality Management*

Check-lists are part of a broader system of quality management that has been progressively developed in the organization starting with ISO 9001 for central processes and expanding to ISO 17020 for inspection processes. The quality management system has penetrated the organization for ultimately covering the entirety of the organizational processes. It is supported by quality coordinators at all organizational levels integrated in quality network aiming at disseminating quality as a philosophy within the organization. It is hierarchically monitored by the National Unit of Implementation and coordination which controls its application in terms of processes and objectives. The quality system is incarnated through the development of standard procedures articulated with a reporting system for inspection reports. The quality system is also monitored via a dispositif of internal and external audits whose scope has enlarged over time and given birth to a systemic dispositif for following-up of non-conformities. All this is imbued in the underlying idea of continuous improvement. At local level, the procedures introduced by the quality management system are positively experienced by inspectors as they nurture a certain view of professionalism anchored in formalism, rigor, reproducibility and methodicity. It provides a more explicit structure in terms of how to do job. Beyond the equity of treatment that is valued through uniformization, reporting facilitates the conduct of inspection as it is said to facilitate the preparation and the following-up of cases. Besides, it brings a feeling of security and stability to inspectors.

Nonetheless, a first source of tension is exposed under the form of a dilemma between standardization and humanity. The tension arises between one positively-experienced side of the quality management system – its added value in terms of objectivity and rigor in the

process of inspection – and its negatively-experienced counter-part – the loss of ‘humanity’ and the reduced place for subjectivity. Humanity embodies the ‘artistic’ side of inspection reflecting humanity in terms of liberty, spontaneity and empathy. Humanity also alludes to the subjective side of inspection reflected through the know-how or the professional expertise that inspectors bring into the inspection process. Despite of the uniformization imbued in the quality system, inspectors seem to maintain their subjectivity in the way they incarnate procedures. Procedures put a framework on inspection. That framework is embodied differently depending on inspectors, their personality, their style and experience. Procedures are depicted as empty shells that inspectors fill in with their own individuality. Furthermore, it appears that inspectors manage to pragmatically maintain space for manoeuvre in the way they carry out inspections. When the situation makes it difficult or requires flexibility, inspectors bend over procedures to adapt them to the encountered case of figure. Humor and sarcasm support the inspectors’ distancing vis-à-vis procedures. The nickname of the local quality coordinator – “Miss Procedure” – and the fun made of the obviousness of procedures are illustrative.

*We consider the ISO norm to be a diabolical scheme which is eats us all. (Inspector 5)*

*Certification is a synonym of humanity loss ... humanity loss ... we are on the path of humanity loss. (...) I think that is the dilemma we are facing nowadays. We improve our professionalism, our austerity, our equity and many more aspects but we are losing our humanity. All those trainings in communication, I am sorry, but it is all planned out, we become less and less spontaneous. That is what really scares me, us becoming less spontaneous. Everything is imposed. We work more and more in a way that is being imposed, standardized and we become less and less human. (Manager)*

The second source of tension is to be found in the on-going change and adaptation required by the philosophy of continuous improvement underpinning auditing. Whereas quality systems are seen as improving the structuration of inspection and enhancing the stability of inspection, they paradoxically contribute to maintain a permanent form of pressure upon inspectors turning them into constantly questioning themselves on the appropriateness and the effectiveness of their ways of working. The stress generated by audits is related to the continuous change that is promoted through the quality system which settles inspectors in a form of instability and insecurity vis-à-vis their own practices which are constantly put into question and externally challenged. Stress derives from the perception of the audit as an eye staring at action and as a judgment on inspectors, continuously casting doubts on their practices and generating the question: Am I doing well? To that extent, it is perceived as a fragilization of knowledge and expertise that generated constant self-questioning among inspectors. The amount of procedures and the frequency of their modification contribute to this impression of confusion amplifying this effect of instability.

*We all need some time to adapt. With every new procedure, we have to forget about our previous way of working and ask ourselves the right questions and this is exhausting... (...). This is probably where all the well-being issues are coming from, because we always have to challenge ourselves. (...) As soon as we accustom ourselves to a new procedure, it changes and we have to do it all over again. It is particularly exhausting because this is not our job. This is not our job, we are inspectors! (Inspector 6)*

#### *Uniformization and accountability through results: Objectives and KPI's*

Techniques of control operationalize the discourse on uniformization and accountability through results. Two key levies are deployed to do so: objectives and KPI's. Objectives set the amount of inspections/samplings to realize by sectors in order to achieve the planning of

control. Key performance indicators have a piloting and correcting function for controlling uniformization in certain domains via for i.e. the number of inspection, sanctions or divergences across UC's. Their development is supported by a cascade-shaped architecture of meetings whose objective is to ensure the treatment and the monitoring of data. Inspectors are also expected to report on how they spend their time via the detail of their activities and displacements. These instruments of control are engrained in the functioning of inspection services. They are presented as crucial for ensuring the accountability of inspection services and as a vector for controlling work and improving performance. Objectives and KPI are experienced positively by inspectors as it allows evaluating themselves and attempting to improve their work. Others evoke the fact that it creates a positive dynamics for achieving objectives. A first tension emerges from two competing views on effectiveness. Objectives and KPI are seen as creating a climate of surveillance, generating pressure for productivity among inspectors and, when crossed with imperatives deriving from the techniques of control targeting processes, producing contradictory expectations. Beyond measurable dimensions, it is suggested that objectives and KPI overlook the very essence of the quality of inspection which remains invisible to these instruments of control. In sum, this tension is structured around competing definitions of effectiveness, one based upon outputs and being indicator-oriented (objectives and KPI's), the other upon outcomes and being impact-oriented (compliance and problem-solving).

*How do you check the quality? They have to realize that the quality of the inspections is lower now. (...) What do I want? I want to be able to leave a company and tell myself that the business is in order, in a practical way. If I can't tell myself that, I don't have what I want. (Inspector 2)*

*It is clear that the Agency has a problem with well-being at work. It is mostly because the pressure, the pressure of meeting the targets but also because they impede our progress with the administrative part of the job being more and more oppressive. We are willing to make more inspections, that is what we like, but we also have all the rest and that takes up more and more time. It takes probably more than 50% of our time. (Inspector 6)*

In relationship with this first tension, inspectors deplore the lack of time and encouragement that is devoted to investigation as a part of the task of inspection. The pressure for results impedes from spending too much time investigating specific cases where sparse evidence of illegality would have been found or where it would have been necessary to go beyond than simply scratching the surface. This is reinforced by the global strategy of inspection at the level of the Agency which states that food operators have to be in a situation of conformity before the arrival of inspectors. This is opposed by inspectors who point the risk to turn inspections into superficial actions leaving aside more complex aspects of a case that would have justified further investigation. Inspectors also denounce the deviating practices that may be encouraged by the imperative of quantified indicators. Measurable results push inspectors to favor 'easy check-lists' or to inspect small operators to do more check-lists in a small period of time with the aim of racking up inspections and meeting numbers. The UC manager and the sectoral managers tend to be critical vis-à-vis the manipulation and the interpretation of figures and KPI's. This proves to be even more prevalent considering the consequences it may have for social relations between inspectors. Concrete examples are given where inspectors compare their own performance indicators with colleagues and complain about the differences existing between them. The competition such comparing attitudes entails is dismissed. Furthermore, they advocate at the upper level of management the use of reflexivity about figures by encouraging caution and prompting to integrate context in data analysis.



*Sometimes, some cases would require further investigation because there is something wrong. I might not have found something massive but I can feel there is something wrong. However, I cannot spend too much time on this, or at least as possible. I might come up with a very interesting report but it might take me three days. In the meantime, I did not meet my numbers. (...) I find this frustrating. This is an overall change because I have to admit that we did not have targets when we were part of the Agriculture division and I could spend three days on writing a full report about a livestock inspection. In the end, it had no consequences for my manager. Now, at the end of the month, he is going to take out his sheet and ask: "Regarding the check-lists, there is still much to do this month, what did you do?" That is basically it. When we talk with people from other divisions that have to follow the same procedures as us, they tell us: "We notice something wrong but that is the only thing we can do, noticing." (Inspector 4)*

#### 4.4. *The introduction of managerial reforms: Subjectification*

Discourses and techniques of control are anchored in the assumption that inspectors are public agents who have to be controlled and made controllable through the process and the results of inspection. While this has been transposed through formal instruments and techniques, the inspector has also been placed at the center of the dispositif with the finality of turning himself into vector of control vis-à-vis his/her own behaviors. The discourse analysis conducted in the first section of this case study supports such a claim arguing for the increasing objectification and the explicitness of inspectors' behaviors. Inspections are not the unique object of control anymore; inspectors prove to be the central object of control. The aim to foster self-regulation and constant self-questioning in terms of "Am I doing well?" and "How could I perform better?"

For example, the new questions that need to be asked are: Are we performing as well as before, or even better, if we simplify the procedures while monitoring the risks that are linked to this activity? What are the risks if we do not *accomplish* the Agency's mission or objectives? How could we reduce the number of complaints regarding our activity? How could we reduce the waste of resources and get rid of what is not productive? (Agency's Newsletter, 2012)

This prompts inspectors to develop new forms of auto-regulation. The previous sections have shown how inspectors are pushed to be in a constant posture of self-questioning and rationalizing of their own practices through procedures, audits and continuous improvement. The following quotes show other illustrations of how inspectors are turned into self-governing individuals. The key concern throughout inspections becomes the respect of procedures; these have become increasingly predominant in the process of inspection and led inspectors to develop instruments of auto-regulation for making sure they respect them. Inspectors create their own check-list for making sure the stick to the procedures is an illustrative example of auto-control.

*Sometimes we ask ourselves: "Did I do that or that? I forgot. I filled in the table..." Does it bring uncertainty to the process? And stress. Yes, because, we go:" I forgot what I have done" and then we have fill in an extra document. That is what my colleague does. She does an extra document and she checks what she has done as soon as she has done it. Is that a check-list of the check-list? Yes, she does a check-list for the inspection, the preparation, the follow-up and the end of the case. (Inspector 5)*

Along with these transversal observations on self-regulated inspectors, a first feature of the subject position introduced via the managerial reform is the inspector acting uniformly. Treating food operators in a uniform fashion is seen as important by inspectors who point the centrality of equity of treatment and objectivity in inspection. The development of this figure of the objective inspector working in uniformed and harmonized ways is also expressed

through the inspectors' concern of their implication in inspections. The reference to the Gauss's curve is alluded to; the objective is to produce an optimal and 'average' inspector. When it comes to examine individual performance, what is looked after is normality in the literal sense of being in the norm. Sanctioning food operators too much or insufficiently is seen as suspect. Diverging too frequently is the sign that corrective measures must be taken. It is all about uniformizing and standardizing behaviors. Extremes are seen as inappropriate. Divergence is tolerated at the margin but closely regulated.

*I like using anonymous graphs and show: "You stand there so you can see that some inspectors work much more, some much less; you stand at the top, that's very good". But then again, I am much into the Gauss curve; I like people that are average. When giving a penalty, we always say: "People who do not give fine and people that give too many bother me as much as the others". Sadly, there will always be the Gauss curve there will always be people on the top/bottom. (Manager UC)*

Consequently, the feeling that professional judgment and expertise are increasingly overlooked despite of the remaining margins of discretion left to inspectors in the instruments and techniques harmonizing inspections is felt as dehumanizing by some inspectors. The comparison to robots and automats can be found to evoke this standardized and automatic figure of the inspector that has progressively infiltrated inspection services.

*The inspectors may think that... that we are less and less human and that we give no room for the personal judgment, their personal judgment. That is how I often feel. Sometimes, they treat us more like check-list carriers than like people capable of thinking and assessing a situation (...). I think the personal assessment has to remain part of the procedure. I think that the inspectors sometimes believe, and they are not wrong, that we do not let them express their personal judgment. They therefore are not capable of finding a meaning to their job. They do not want to work as machines; they not want to be robots and that is probably the negative side of the change. (Inspector 2)*

*Yes, I understand, but when we talk to other people who are new to the system (because I have heard that we are far ahead in the system compared to others), I understand they talk to me about it but I say: "We share the same issues". They understand because we share the same feeling and also because:" Nowadays we cannot do this because now we have to do this". (Inspector 4)*

A second characteristic is the figure of the cost-effective and cost-efficient inspector. Inspectors have internalized a conception of the job as related to a set of objectives to be achieved and performance indicators to be judged upon. Being cost-effective is thus presented by inspectors as a necessary dimension of their role.

*It is true that we feel like we are being monitored but we have to... we are getting paid for the job so we have to prove profitability as well. It was much cooler before. Somehow, it is stimulating because we don't want to be the last ones. (Inspector 5)*

Cost-effectiveness is integrated in the idea of optimality, that is, the use of the right amount of time and effort in inspections. The objective is not to conduct perfect inspections but optimal ones considering both the global objectives to reach and the expected performance to achieve. The image of the purposeful, creative and investigating professional is set aside in favor of an efficient and self-controlling inspector who is expected to find its most optimal way of functioning for finding the right balance between depth and quantity of inspection.

*Then, inspectors tell me: "So, you want us to do incomplete inspections and stuff?" And I say: "Yes, that's it". For me, it is more difficult to say: "You are doing your job too well" (laugh) than to say: "You are not doing your job well". To say to someone: "Don't go that far, it is not worth*

*it, your work is not appreciated considering the time you invest". I have to say that it is hard for me to say: "Do your job quickly and roughly". It is not an easy thing to say. (Manager UC)*

The imprinting of this new form of subjectivity has led some inspectors to explicitly reject them. Subjectivity is fiercely defended and underpinned by a refusal of the automatic robot-like figure of the inspector. It is also resisted via the reaffirmation of professional discretion and the final objective that drives behaviors, that is, food safety.

*In fact, we don't use that word very often... it is pejorative... in the Agency, they would like us to be blinkered and a lot of us are completely against it. If one day, they impose us a blinkered way of seeing things, then we will leave, find another job, that's for sure because I don't want to be blinkered. My job is to monitor the food safety, so I have to see everything. (Inspector 6)*

*From what I hear, I believe that those who used to work without check-list feel a bit like robots. However, I think it allows us to cover the whole inspection. We cannot deny that the inspection is guided by the check-list. (...) I don't feel like a robot, I am still the one who decides whether the business is in order or not and no one will ever take my judgment away from me. (Inspector 3)*

The figure of the inspector exclusively devoted to the meeting of figures is contested with an alternative conception of the subject focused upon outcomes. Such a critical stance rests upon a dismissal of a form of effectiveness based upon outputs in favor of another view on the effective inspector dedicated to alternative targets including outcomes and problem-solving.

*It is not mine because they want us to be everywhere and to reach high numbers so that they can tell the Minister that we inspected as many institutions... I don't like this way of working. I would rather deal with the situations where we are facing a problem. (Inspector 2)*

*I believe this to be a personal choice. It is true that you whether decrease your quality of work and meet your targets. Personally, this is not my goal. My goal remains the monitoring of public health. If there is sanity issue right after I inspected a company, I would feel responsible so I want to do my job correctly. When I leave a company, I am sure of my inspection. (...) The aim is that the operator gets the message, sees the goal and that we reach it. Personally, that is my goal. Others work in a different way. It depends. Is it because they have more time? Because some of them work with the pressure of meeting the targets and that they have to be quick. Some of them forget all about public health and some remain administrative. (Inspector 6)*

Interestingly, resisting the imprinting of such subjectivity is not interpreted as a smooth linear process but as a personal process of self-creation. Inspectors taking such a critical distance allege to have gone through a work on themselves, which displays that the penetration of the managerial logic upon subjectivities turns out to be experienced as powerful. Similarly interesting is to observe that these individual experiences are informally shared with other inspectors, contributing to initiate comparable reflexive processes.

*At some point, I was really under pressure and I thought: "I have to do more, I have to do more, I have to do more". Then, I decided to take some distance and since then, I feel much better, I do my job, I do my best, I try to relieve so that it is easier for everyone but I don't let myself feel pressured because of the game of KPI's. (Inspector 2)*

*Personally, every time they would talk about those numbers and that they would tell us that it is enough, as if we weren't working enough, I would be really upset. Now, I keep things in perspective and I tell myself: "I do what I can and I keep going, I know I keep going." It is basically a work on yourself. (Inspector 6)*

More generally, judiciousness, reflexivity and critical thinking are pointed as responses. Being critical and alert is exposed as an important attitude for being able to avoid 'getting trapped' by the perverse effects of uniformization. This is expressed in the challenge of 'keeping people intelligent' vis-à-vis the instruments of inspection and to make good sense of the encountered situation in balanced with what is asked by check-lists and procedures. Reflexivity is also expressed as a critical organizational challenge that must go beyond what is encouraged at individual level. At organizational level, this implies keeping questioning the pertinence of the instruments of control that have been developed in the organization by prompting to take some critical distance vis-à-vis the course of managerial reforms in which the Agency has engaged.

*That's probably something that is missing, common sense. We need to keep common sense despite check-lists and procedures and so on. We need common sense. We don't have to go blindly in direction without asking ourselves question. It's the danger. (Sectoral Manager UC)*

*Those are the perverse effects. There are perverse effects and we have to keep people intelligent. People that can distance themselves from the check lists? People that distance themselves, yes, because everybody can fill in a check list. Why should you study 3 or 6 years to do that? I am sorry but you don't have to. (...) I think it was after the rail incident in Halles a few years ago, I was listening to a debate on the radio about quality systems and some quality and crisis specialists were saying: "Are we doing the right thing with that certification system?" Fortunately, some people are still asking questions and we are therefore not diving right into it. I am telling you, we should put those standardized systems away sometimes and have a look of what is going elsewhere, see how things are done (Manager UC)*

#### 4.5. *Managerial Reforms at the front-line of the Belgian Food Safety Agency: Findings*

The managerial logic that penetrates inspection services is based upon two ideals. Uniformization rests upon standardization of inspection both in terms of processes and outputs. Standardization must not be understood in Weberian terms but must associated with the notions of productivity and harmonization of behaviors: "We see standardization above all as the new mode of managerial control" (Czarniawska and Genell, 2002: 471). Accountability is anchored in result-orientation and performance. Ideals have been derived into an operational managerial discourse promoting a set of principles and legitimizing rationales, progressively turning them into a 'way of thinking' for the Agency. These principles have materialized in techniques of control that have squared both inspections and inspectors. Directly linked with this phase of objectification, the managerial logic has imprinted a new ideal-typical form of subjectivity.

In the same time, the case has shown that the penetration of the managerial logic in the organization is far from being a unidirectional movement but a much a more complex articulation between internalization and resistance. Check-lists are presented by inspectors as great instruments for harmonizing inspection across the country and diffusing a sense of equity of treatment which is valued in the UC as philosophy of inspection. They are also said to structure inspections, to make them more rigorous, to provide a useful reminder and to secure to inspectors about the exhaustiveness of the inspection. Simultaneously, check-lists are warily handled as they are seen as compressing professional judgment, putting inspectors in contradictory situations, placing them upon automatic tracks or detaching them from an integrated and context-based view of inspection. Procedures and audits are experienced as structuring inspection, improving the preparation of cases and providing a sense of security to inspectors. In the same time, procedures are lived out as a loss of 'humanity' in inspection and devaluation of professional expertise and autonomy, while audits

create a climate of instability putting inspectors in a situation of constant epistemic distress fuelled by a constant self-questioning of practices. With regard to the control of results, the tension has been observed along two competing definitions of effectiveness, indicators and measurability. The case has revealed the nature of the responses addressed by inspectors: the engagement for maintaining divergence as normal practice, the resistance vis-à-vis the growing centrality of check-lists, the pragmatic bending of procedures, the continuous alertness for avoiding being trapped in automaticity, the maintaining of the context-based inspections, the critical reflexivity vis-à-vis the use of numbers, the opposition to 'deviating' practices identified to the centrality of figures or the promotion of another vision of effectiveness. The case has also revealed forms of resistance drawing on an alternative conception of the 'good' inspector deploying professional judgment and expertise in purposeful and an individualized solution-oriented way; one can note the individual process of self-creation in which inspectors engage through reflexivity. In short, these tensions can be interpreted as the visible expression of the competing interactions between a managerial and a professional logic underpinning inspection. The table 1 summarizes the nature of these two ideal-typical interacting logics in the light of the various areas of frictions that have been pointed out in the case.

<b>Table1.</b>	<b>Managerial logic</b>	<b>Professional Logic</b>
<i>Dominant Perspective</i>	Uniformization and Standardization Productivity and Cost-Effectiveness/Efficiency	Professional judgment and discretion Professional expertise and experience
<i>Legitimacy</i>	Standardized action based upon the most uniform result possible Control of cost and optimal efficiency	Individualized action based upon the best context-based possible result Solution-oriented
<i>Accountability</i>	Output-based Performance Indicator-oriented	Outcome-based Impact-oriented
<i>Ideal-Image of inspector</i>	Inspecting uniformly Cost-Effective/Efficient High scope on KPI's	Expert Purposeful Innovative and creative
<i>Competences and knowledge</i>	Continuous improvement Objectivation of competences and knowledge	Stability and marginal adjustments Esoteric side of competences

## 5. Discussion

In the introduction of this contribution, Brodtkin was quoted for her reference to a couple a studies tending to suggest the intensification of the dilemmas and tensions experienced by street-level bureaucrats under the influence of NPM-based reforms. Challenging this idea, the case has shown that the change in the essence of tensions is not about intensification but about transformation. The case prompts to consider that it is the nature, rather than the intensity, of these tensions that has evolved. This prompts to re-interpret the key Lipskian concepts exposed earlier in this paper: tensions, dilemmas, coping mechanisms and discretion.

Before developing into that point, it seems relevant to comment the paradoxical relationship inspectors have with the discourses, the instruments of control and the social roles diffused through managerial reforms. One interviewee compares these changes to the Aesop's tale, meaning they are both the best and the worst in the same time. The comparison is revelatory of what has been observed in the case study. One may be intrigued by such schizophrenia

observed among front-line regulators. A similar 'Je-t'aime-moi-non-plus' relationship is evoked by Westenholtz (2011) for describing the hybridization of organizations bending under the weight of two competing institutional logics as "a process of combining contradictory elements in a 'both/and' approach, which simultaneously holds the contradictory positioning in mind". The author emphasizes the paradoxical and schizophrenic nature of such a process where neither unification nor fusion of logics occurs. Such a situation of hybridity seems to be observable in the case study. The managerial logic diffused through reforms has come to occupy a dominating position in the organization while the professional logic that was prevalent before the reforms is still present. From this point of view, street-level bureaucracy can be envisaged as an 'experience' of contrasting forms of normativity and subjectivity encapsulated in competing logics.

The nature of the tensions experienced at street-level is not so much the result of particular working conditions due to the nature of activities at street-level crystallizing in dilemmas as advocated by Lipsky. Rather, tensions seem to be the visible expression of two competing institutional logics underpinning work at the front-lines. Contrasting with the classical Lipskian views, tensions do not simply have to be regarded as resulting from ambiguous, contradictory and pressurizing work conditions. Rather, tensions constitute a dynamic framework mediated by both managerial and professional logics where inspectors renegotiate guiding principles of action, criteria of accountability, sources of legitimacy and subjectivities (Aili *et al.*, 2007). The case has shown that such a re-negotiation is not an easy and linear process. The development of the managerial logics weighs upon individuals and has an imprinting influence on practices and subjectivities. Emancipating from the managerial logic which has become predominant over time is a form of resistance which can be assimilated to an ethical project through which inspectors oppose the disciplinary power diffused through the managerial logic, reject the truth it encapsulates, and engage with alternative discourses and subjectivities. Such a reflexive and emancipating response is fuelled and rendered possible by the remaining professional logic which is ethically drawn on by actors. This reveals the hidden face of the schizophrenic situation observed in the case. It reflects the complex articulation between internalization and resistance occurring at individual level while showing how the professional logic is drawn on for ethical purposes.

At the core of these tensions, the deep ontological foundations of these logics prove to be equally contrasting. The reference to forms of de-humanization or robotization echoes a deeply-grounded nature of tension that reflects two contrasting views on the individual. Beyond the epistemic distress and instability that may be experienced by inspectors in the core of these logics, the case emphasizes the instrumental, distrustful and transactional conception of individuals and social relations that is vehiculated through the managerial logic. As Giauque (2003: 279) notes, the managerial reforms in the public sector are loaded with a functionalist and individualizing conception of human beings. This contrasts with the foundational dimensions of collegiality, trust and cooperation imbued in its professional counterpart (Evetts, 2012). This meta-criterion that lies in the 'ontological substance' of logics emerges as the bottom-line of the tensions that have been revealed throughout the case. It shows the very essence of the tensions experienced by front-line regulators and, beyond what has been already said about it, the contrast with the Lipskian view on tensions at street-level.



Contrasting with the classical Lipskian views, coping mechanisms do not have to be regarded “tricks” or as strategies deployed for avoiding the pressures of street-level activities and preserving individual preferences (Winter, 2002: 3). Rather, in this contribution, coping mechanisms can be roughly associated with the ethical process based upon reflexivity initiated by front-line regulators. Ethics must be understood in Foucauldian terms, that is, the way the individual constitutes himself as the moral subject of his actions. As bureaucracy is bent by multiple logics for action, Newman (2005) suggests public servants are turned into dilemmatic spaces. Along the same line, the case has shown how individuals become the ‘surface’ of the tension between logics by ethically engaging with the ‘renegotiation’ of subjectivities, criteria of legitimacy or principles for action. The remaining presence of the professional logic provides such an alternative allowing them to engage in such a process of resistance at the interaction of “powerfully determining and institutionalized regimes of truth” (Ibara-Colado *et al.*, 2011: 47-48). By extension, discretion is not simply a freedom to make choice between different courses of action but constitutes an object of renegotiation that takes place at individual level; it results from personal positioning and engagement vis-à-vis two competing logics each detaining a different view upon discretion, how it needs to be used and to be deployed. Although the freedom to make choice between courses of action remains, discretion and discretionary behaviors constitute ‘politicized’ objects about which logics oppose and which is arbitrated at individual level between internalization and resistance.

It has been interesting to observe how front-line officials adopt some reflexive posture and how the middle management prompt inspectors to remain critical vis-à-vis the pertinence of techniques of control and the well-foundedness of the managerial discourse. From the analytical angle that has been taken in this paper, the challenge for street-level bureaucracies is to organize “the dialogue” between logics that has already been partly engaged by front-lines workers as we could observe the insistence on being reflexive on managerial reforms and questioning their foundations. Hatchuel and Weil (1992) have suggested elaborating a common referential for organizing the cohabitation of multiple logics. Operationalizing the idea, Minvielle (2000) urges to have recourse to a set of negotiation rounds for improving the dialectical articulation of logics. The challenge for organization may also be seen from the angle of the management of institutional pluralism. Systematically reviewing the literature on the topic, Fjellvaer (2010) pinpoints three main approaches for managing the tensions this cohabitation can cause among which strategies of negotiation (balancing demands, moving from confrontation to complementarity, trade-off, etc.) and socialization/communication (classification of practices, common training, third-party intervention, scripts for managing conflicts, etc.). In an era of post-NPM reforms where it appears that street-level bureaucracies can be envisaged from the angle of such pluralism, the challenge surely lies in the organizational regulation of the coexistence of these logics.

## Conclusion

This contribution aimed to study the influence of NPM-based managerial reforms in street-level bureaucracies. More specifically, it had the ambition to challenge the relevancy of the Lipsky's dilemmas in a context of New Public Management. By drawing upon an institutional logics perspective, it has revisited these tensions by presenting them as dynamic frameworks mediated by managerialism and professionalism where inspectors renegotiate guiding principles underpinning action, criteria of accountability, sources of legitimacy and

subjectivities. It has also emphasized the impact such an interpretation could have on the use of discretion and the coping mechanisms that have been traditionally identified as key elements of street-level bureaucracies. With regard to the existing literature on street-level bureaucracy, the paper has responded to calls for reintegrating professionalism and managerialism as key variables in the analysis, and for developing a finer understanding of discretionary behaviors at street-level. Along with recent calls for moving in that direction (Evans, 2010; Ellis, 2011), it seems that such an approach paves the way for refreshing research at street-level while showing the importance of grasping the influence of the organizing and the institutional arrangements of front-line public services. Rather than using Lipskian reflections for highlighting implementation gaps or deficits of control in a multi-level approach of policy implementation, this paper invites to grasp the complexity and the multi-dimensionality of the tensions produced by the coexisting but competing institutional logics at the front-lines. While the literature on policy implementation urges to investigate the multiplicity of “regimes of accountability” and “modes of implementation” in which street-level bureaucrats are embedded (Terpstra and Havinga, 2001; Hupe and Hill, 2007), the recourse to critical public management and organization studies in which this contribution is anchored contributes to refine the analysis of these dynamics occurring at street-level and to provide a critical reading of the subject-based implications and experiences of such a multiplicity. Such an approach of street-level bureaucracies and regulatory policy implementation encourages conducting empirical research in other types of regulatory services (labor inspection, environmental inspection, etc.) could be interesting to study further especially as one considers the calls for better understanding the behaviors of these public agents working in regulatory front-line bureaucracies in the following of NPM-inspired reforms in the public sector (Pautz, 2010; Pires, 2010).

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## Appendix 1. Sources

Document	Period
<b>General Documents from the organization</b>	
Rapports annuels	1995-2000
Rapports annuels	1995-2000
Rapport annuel	1979
Rapports d'activités	2000-2011
Business Plan 2005-2008	2005-2008
Business Plan 2009-2011	2009-2011
Business Plan 2012-2014	2012-2013
Business Plan 2012-2014 Pwp	2012-2014
Plan de Management Opérationnel J.M. Dochy	2003-2006
Plan de Management Opérationnel P.Mullier	2003-2006
Mission de Consultation : Change Management	2002
Glossaire de l'Agence	2006
Politique Qualité de l'Agence	2008
FAVW haalt ISO 9001	2009
Déclaration de Politique de la qualité DG Contrôle	2012
L'AFSCA et les démarches Qualités	2011
La qualité, c'est facile: J'en fais tous les jours	2012
La gestion de la qualité et le contrôle interne	2013
<b>Documents related to inspection</b>	
Checklists	2007-2013
Fiche de KPI (Source Interne)	2013
Trajet Communication avec le contrôle	2008
Charte de l'inspecteur et du contrôleur	2010
Description de fonction de l'inspecteur	2013
Enquête auprès des opérateurs contrôlés	2009
Enquête auprès des opérateurs contrôlés (Discussion CC)	2009
Enquête de perception des consommateurs	2010
Enquête de perception des consommateurs (Discussion CC)	2011
Manuel d'utilisation FoodNet	2008
<b>External Communications/Conference/Interviews</b>	
Infobulletins de l'agence alimentaire fédérale (13/50)	2002-2013
Comment aborder sereinement un contrôle AFSCA	2012
Entretien avec Piet VanTemsche 1	2005
Le processus central de l'AFSCA Bonnes Pratiques	2005
Entretien avec Piet VanTemsche 2	2005
Le processus central de l'AFSCA	2006
Entretien avec Piet VanTemsche 2	2007
L'AFSCA un service public moderne	2009
L'Agence fédérale pour la sécurité de la chaîne alimentaire	2011
Le trajet Management responsable à l'Agence	2011
Le trajet Management responsable à l'Agence Pwp	2011
<b>Vidéos</b>	
Comment se déroule un contrôle dans l'horeca?	2012
Les yeux sur le plat	2008
La charte des inspecteurs et contrôleurs de l'Agence	2010
Le changement à l'Agence	

Press Articles	Journal	Date
Contrôle des denrées alimentaires par l'Agriculture	L'Echo	2-août-94
Un label de qualité	Vers l'Avenir	13-janv-95
Traque à l'hygiène dans l'Horeca	Vers l'Avenir	13-janv-95
Agriculture: Faire plus et mieux avec moins de moyens	Vers l'Avenir	27-juin-95
Coup de froid sur les assiettes	Le Vif	21-juil-95
Les filières du contrôle	Trends Tendances	11-avr-96
Alimentation: 40 nouveaux contrôleurs	L'Echo	22-mai-98
Agence de sécurité alimentaire: transparence et contrôle intégré	L'Echo	4-août-99
La gestion de la qualité, planche de salut du secteur alimentaire?	Industrie	3-sept-99
Dioxine: on fait déjà le procès de certaines personnes...	L'Echo	2-oct-99
La discrétion n'est pas l'étouffoir	Vers l'Avenir	25-janv-00
Dioxine: désaccord sur les responsabilités politiques	L'Echo	4-mars-00
L'Agence fédérale de sécurité de la chaîne alimentaire est sur les rails	L'Echo	16-août-00
Dioxine Routine	Trends Tendances	3-sept-00
Voici à quoi ressemblera la future agence de sécurité alimentaire...	L'Echo	28-déc-00
Sherlock en cuisine	La Dernière Heure	5-févr-01
Contrôles alimentaires: Plus d'inspections et un système de bonus-malus	La Dernière Heure	5-févr-01
Ces inspecteurs à l'affût des germes Souri	Le Soir	20-févr-01
Les restaurants plus contrôlés	La Libre Belgique	22-nov-01
Les agents de l'Afscsa exigent des contrats stables	La Libre Belgique	13-févr-02
Des contrôles renforcés en 2004 : Entretien avec Piet Van Temsche	Le Soir	15-nov-03
Ils contrôlent ce que vous mangez	Le Jour Liège	9-juin-06
Les limiers de l'alimentation	Le Soir	22-juin-06
De nouveaux locaux pour l'AFSCA	La Libre Belgique	23-juin-06
L'AFSCA arrondit les angles	Sud Presse	31-juil-06
Hygiène du sol au plafond	Sud Presse	17-févr-07
Des risques permanents et changeants	Sud Presse	28-juil-07
L'Afscsa surveille le chaud et le froid	La DH	19-juil-08
Un resto sur deux est en infraction	Le Soir	8-juil-09
Quatorze contrôleurs descendent sur Wavre	Sud Presse	16-oct-09
"L'Afscsa, ce n'est pas la Gestapo"	La DH	20-oct-09
Les denrées alimentaires à la loupe	Le Soir	20-oct-09
Débusquer le manque d'hygiène	Sud Presse	25-sept-09
L'Horeca est sain à Wavre	Le Soir	30-oct-09
Ath : la chaîne alimentaire avertie des contrôles	Sud Presse	9-nov-09
Elle contrôle nos aliments	Sud Presse	17-nov-09
Une semaine de contrôle pour 190 établissements	Vers l'Avenir	25-mars-10
L'AFSCA entend redorer son blason	L'Echo	30-juin-10
Bonjour, je viens pour un contrôle de l'hygiène	Sud Presse	13-août-10
Contrôle AFSCA chez Darcis	Sud Presse	1-sept-10
Dans les cuisines d'un traiteur avec l'AFSCA	Sud Presse	21-oct-10
Un contrôlé de l'AFSCA averti en vaut deux!	Sud Presse	8-févr-11
Incursion dans les cuisines d'un Quick	Le Soir	10-févr-11
Une visite pas toujours agréable	La DH	16-févr-11
L'Afscsa débarque dans les assiettes louviéroises	Sud Presse	22-févr-11
Namur : personne n'échappera au contrôle AFSCA	Sud Presse	22-mars-11
L'horeca namurois passé au crible	Le Soir	22-mars-11
"Vous ne pouvez pas mettre de viande ici!"	Sud Presse	23-mars-11
L'Afscsa ne laisse rien passer	La DH	23-mars-11
Dans les cuisines d'un resto avec l'AFSCA	Sud Presse	26-mars-11
On ne tue pas les bouchers	Sud Presse	26-mars-11
Le rappel des normes	Sud Presse	30-mai-11
Sur la route avec un inspecteur de l'AFSCA	Sud Presse	30-mai-11
Ancienne élève, elle contrôle Sainte-Claire	Sud Presse	7-juin-11
AFSCA : 154000 contrôles en 2010	Dh	8-juin-11
L'Horeca reste le point noir	Le Soir	13-juil-11
L'AFSCA ne baisse pas sa garde	L'écho	13-juil-11

Les snacks en ont marre d'être fichés	Sud Presse	14-juil-11
Une journée avec un contrôleur de l'AFSCA	Sud Presse	18-juil-11
Je voudrais un débat avec l'AFSCA	Sud Presse	29-juil-11
Snack & Co: pas tous réglés	Sud Presse	19-sept-11
Bulletin d'hygiène alimentaire très positif	Sud Presse	24-oct-11
Contrôles massifs de l'Afscà à Huy	Le Soir	3-janv-12
Contrôle de l'hygiène à Huy toute la semaine	Vers l'Avenir	24-janv-12
Contrôle de l'Afscà: dans les coulisses	Sud Presse	3-mars-12
Afscà les commerces prévenus d'un contrôle	Sud Presse	9-mai-12
L'hygiène laisse à désirer dans l'Horeca	Le Soir	27-juin-12
Faut-il s'inquiéter de l'hygiène dans les restaurants?	Le Soir	28-juin-12
Enkel geheime inspectie is goede inspectie'	De Standaard	20-juil-12
Nos fermiers suivis à la trace	Le Vif	28-juil-12
L'Afscà débarque dans la cité a clole	Sud Presse	16-oct-12
Leçons de l'AFSCA avant contrôle	Sud Presse	1-févr-13
Hygiène : 62,9 % des snacks pitas recalés	Le Soir	8-févr-13
Mangez, vous êtes contrôlés !	Vers l'Avenir	19-févr-13
Communiqués de presse et annonces de vagues de contrôle	AFSCA	Depuis 2009
Friction sur les contrôles et leur rigueur		
Houins : pour l'honneur de l'Afscà	Le Soir	7-août-10
Le « Trop c'est trop » de l'Afscà, Di Antonio pointé du doigt	Sud Presse	2013
Objectif : « Dénoncer les aberrations de l'Afscà »	Sud Presse	2013
Fromage de chèvre : en litige avec l'Afscà	Sud Presse	13-déc-12
Dénoncer les aberrations de l'Afscà	Sud Presse	5-févr-13
Écolo veut réformer l'Afscà	DH	16-févr-13
L'Afscà et Laruelle critiquent Deleuze	DH	19-févr-13

## Appendix 2. List of interviews

<b>Agency*</b>
CEO
General Director of General Services
General Director Laboratories
General Director Policy of Control
Head of Internal Audit Unit
Head of Quality Management for the Agency
HR Advisor
<b>DG Control</b>
General Director of DG Control
Director Regional Administration
Director Central Administration
Head of Quality Management for the DG
<b>PUC</b>
Manager of PUC
2 Sectoral Managers
Local Quality Coordinator
6 Inspectors
*Some of the interviews conducted at Agency level have been mixed with interviews conducted in the context of a parallel research project