

Why Safety Policies Fail in High-Risk Public Organizations: An Implementation Governance Perspective from the Power Generation Sector

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Abstract

The failure to implement occupational safety and health (OSH) policies remains a persistent problem in high-risk public organizations, even though a comprehensive regulatory framework and operational standards are in place. This article aims to analyze why OSH policies fail to be implemented effectively in high-risk public organizations using the perspective of implementation governance. This study uses a qualitative approach through case studies in the power generation sector, with data collection techniques in the form of in-depth interviews, observations, and policy document analysis. The analysis is based on a policy implementation framework that emphasizes the interaction between policy objectives, resources, organizational characteristics, implementer disposition, and communication patterns. The findings show that the failure of OSH policies is not solely due to weak individual compliance, but rather to the discontinuity of implementation governance at the operational level. This study contributes to the enrichment of the policy implementation literature by repositioning OSH as a matter of public organization governance, not merely regulatory compliance.

Keywords: policy, governance, occupational safety, organizations, generation sector, Indonesia

1. Introduction

High-risk public organizations, such as the power generation sector, operate in a work environment characterized by technological complexity, pressure to maintain public service continuity, and significant potential safety hazards. Operational activities involving high-voltage systems, heavy mechanical equipment, and work in confined spaces make occupational safety and health (OSH) a key prerequisite for organizational sustainability. Various international regulations and standards have been designed to control these risks through structured OSH management systems (International Labor Organization [ILO], 2019). However, workplace accidents and risky practices still frequently occur in strategic public organizations in the energy sector, including power generation units. These empirical conditions indicate a gap between the design of safety policies and their implementation at the operational level. Studies of high-risk organizations show that compliance with safety policies often weakens when organizations face performance pressures, resource constraints, and coordination complexities ((Reason, 2016); (Weick & Sutcliffe, 2015)). In the context of public organizations, occupational safety is often treated as an administrative obligation that is separate from operational decision-making. As a result, OSH policies are not fully internalized as work norms, but are implemented procedurally and reactively.

The policy implementation literature emphasizes that the success of public policy depends heavily on the implementation process, not solely on the quality of policy formulation (Pressman & Wildavsky, 1984; Hill & Hupe, 2014). The classic implementation model proposed by Van Meter and Van Horn (1975) emphasizes the importance of alignment between policy objectives, resources, characteristics of the implementing organization, the disposition of the implementers, and communication between actors. In the context of high-risk organizations, the failure to implement safety policies can have a direct impact on human safety and the sustainability of public services. However, OSH studies in international and national literature are still dominated by technical and behavioral approaches, such as safety management systems, safety culture, and human factors (Cooper, 2018; Guldenmund, 2010; Dekker, 2014). These approaches make an important contribution to understanding micro factors of occupational safety, but they pay relatively little attention to the dimensions of policy governance and implementation dynamics in public organizations. Several studies show that even though OSH systems and procedures are in place, safety practices still depend on the organizational context and how policies

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are translated at the operational level (Borys et al., 2009; Hopkins, 2012).

These limitations in the literature indicate a conceptual gap in understanding the failure of OSH policies as an issue of implementation governance. Policy implementation approaches that are sensitive to the organizational context are still rarely used to analyze occupational safety in high-risk public sectors. In fact, policy implementation is an arena where policies are interpreted, negotiated, and practiced by various actors with different interests and capacities (Matland, 1995; Hupe & Hill, 2016). This gap hinders a more comprehensive understanding of why well-designed safety policies still fail in practice. This study uses the implementation governance perspective as the main theoretical framework to analyze the failure of OSH policies. This perspective views policy implementation as a governance process involving interactions between actors, organizational structures, resources, and institutional contexts (Hill & Hupe, 2014; Peters, 2015). Within this framework, policy is not understood as a linear instruction from policymakers to implementers, but rather as a dynamic process influenced by power relations, actor interpretations, and operational conditions.

Analytically, this study integrates the framework of Van Meter and Van Horn (1975) with the implementation governance approach to assess how OSH policy objectives, organizational capacity, implementer disposition, communication, and the operational environment shape occupational safety practices. This integration allows for a more contextual analysis of the policy-practice gap in high-risk public organizations, as well as repositioning OSH as an issue of organizational governance, rather than merely a matter of technical compliance. With this framework, the study seeks to explain the failure of safety policies as a logical consequence of implementation governance that is not aligned with the complexity of risks and the dynamics of public organizations.

2. Method

This study uses a qualitative approach with a single case study design to analyze the failure of occupational safety and health (OSH) policy implementation in high-risk public organizations. This approach was chosen because it allows researchers to gain an in-depth understanding of the dynamics of policy implementation in a complex organizational context, where interactions between actors, structures, and operational practices shape the actual outcomes of policies (Yin, 2018). The case study focused on PT PLN Indonesia Power Unit Pembangkitan Barru (UBP Barru), which represents a strategic public organization with a high level of safety risk and a formally institutionalized OSH policy system.

UBP Barru was chosen as the research location because it has characteristics relevant to the research objectives, namely: (1) high-risk electricity generation operations, (2) the implementation of an OHS system that refers to national regulations and internal company policies, and (3) indications of a gap between policy standards and operational practices, as reflected in internal audit reports, work incidents, and near-misses. Thus, this case is considered a critical case that allows for an in-depth exploration of the issue of implementation governance in OSH policies.

Research data was collected through three main techniques, namely in-depth interviews, field observations, and document analysis. In-depth interviews were conducted in a semi-structured manner with key informants directly involved in the implementation of OSH policies, including unit management, OSH supervisors, operational supervisors, field workers, and contractors. This technique was used to explore perceptions, experiences, and practices of OSH policy implementation from various structural positions, thereby enabling a comprehensive understanding of the dynamics of implementation governance.

Field observations were conducted to directly observe work practices, compliance with safety procedures, and interactions between actors in daily operational activities. These observations served to capture practical dimensions that are often not fully revealed through formal interviews.

Meanwhile, document analysis covers internal OSH policies, standard operating procedures, audit reports, incident and near-miss reports, and safety performance evaluation documents. The use of various data sources aims to strengthen the validity of findings through triangulation (Denzin, 2012).

Data analysis was conducted thematically with reference to the implementation governance framework. The analysis process began with open coding to identify initial themes that emerged from the interview, observation, and document data. Next, axial coding was performed to group these themes into categories

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that represent the dimensions of policy implementation, such as policy objectives, resources, organizational characteristics, implementer disposition, and communication and coordination patterns (Van Meter & Van Horn, 1975). The final stage of the analysis was conducted through selective coding to formulate patterns of relationships between categories and explain the mechanisms of OSH policy implementation failure at the operational level.

The Van Meter and Van Horn framework was used as an analytical lens to assess how OSH policies were translated into work practices and how organizational and governance factors influenced implementation outcomes. This approach enabled a systematic analysis of the policy-practice gap and avoided reducing safety issues solely to individual behavior.

Data validity was maintained through triangulation of sources and methods, member checking of key informants, and systematic recording of the analysis process to ensure traceability of findings (audit trail). This study also adhered to research ethics principles by maintaining the confidentiality of informants' identities and obtaining informed consent. The entire research process was conducted in accordance with social research and public policy ethics standards.

3. Results and Discussion

The Policy-Practice Gap: Administrative Compliance vs. Operational Reality

The results of the document analysis show that UBP Barru has a relatively complete OHS policy framework that is in line with national regulations and the internal policies of PT PLN Indonesia Power. The documents analyzed include unit OHS policies, standard operating procedures (SOPs), work instructions, and internal audit reports. Formally, these policies cover work risk control, the use of personal protective equipment (PPE), work permit procedures, and incident and near-miss reporting mechanisms.

However, field observations and interviews revealed significant variations in the implementation of OHS procedures at the operational level. In some high-risk activities, such as working at heights and maintaining live equipment, work practices were found that did not fully comply with SOPs, especially when the work was carried out under time pressure or labor constraints. Informants from the supervisory and field worker levels stated that OSH procedures were often perceived as "formal documents" that were difficult to apply consistently in dynamic operational situations.

These findings indicate a policy-practice gap between OSH policy standards and their implementation in the field. Safety policies function more as administrative instruments than as operational guidelines that are alive in daily work practices. This condition indicates that the failure to implement OSH is not caused by the absence of regulations, but rather by weak mechanisms for translating policies into contextual and adaptive operational practices.

Resource Constraints and Operational Priorities

From an implementation governance perspective, OSH policies have not been fully internalized as collective work norms within the organization. Interview data indicate that limited human resources and time are the dominant factors affecting the implementation of OSH policies. Informants at the managerial and supervisory levels stated that the high operational workload is often not commensurate with the number of personnel available, especially during periods of routine maintenance and unplanned operational disruptions.

Under these conditions, work priorities tend to be directed towards restoring operations and achieving performance targets, while safety procedures are narrowed down to those aspects that are considered most crucial. In addition, although formal OSH training has been implemented, the data shows that the intensity and depth of the training has not fully reached all workers.

Limited resources and implementation capacity show that OSH policies are implemented under structural conditions that are not fully supportive. In the framework of implementation governance, resources are not only a matter of budget or personnel availability, but also the organization's ability to align workloads with safety standards. When implementation capacity is inadequate, safety policies tend to be negotiated pragmatically in the field, opening room for compromise on OSH standards.

Implementers' Disposition and Risk Normalization

Interview data revealed differences in the disposition of OSH policy implementers between organizational levels. At the managerial level, occupational safety is normatively viewed as a strategic

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priority and part of the organization's professional image. However, at the operational level, some workers view occupational risks as an inherent part of power generation work. Statements such as "it's normal" or "it's always been safe" were repeatedly heard in interviews with field workers.

Field observations also showed the practice of risk normalization, where recurring potential hazards tend to be considered normal working conditions, thereby reducing vigilance towards safety procedures. In some cases, experienced workers were more likely to rely on personal experience rather than strict adherence to SOPs.

These findings indicate that the disposition of policy implementers plays a key role in the failure of OSH implementation. Risk normalization indicates that safety policies have not fully shaped a shared meaning of risk and safety at the operational level. From an implementation governance perspective, this failure is not merely a matter of individual attitudes, but a reflection of weak organizational mechanisms in building consistency in safety values between the strategic and operational levels.

Fragmented Communication and Coordination Patterns

Data analysis shows that OSH policy communication at UBP Barru takes place through formal structural channels, such as safety meetings, toolbox meetings, and SOP socialization. However, the effectiveness of this communication varies between units and work activities. Informants stated that policy information is often conveyed in a one-way manner and focuses on administrative compliance, without any room for discussion regarding implementation challenges in the field.

In addition, coordination between internal units and contractors shows weaknesses, particularly in terms of aligning understanding of safety standards. Differences in work culture and operational interests mean that OSH implementation is not always uniform. Fragmented communication and coordination patterns reinforce the failure of OSH policy implementation. In the framework of implementation governance, communication is not merely the transmission of information, but rather a process of forming a common understanding and negotiating the meaning of policies. When communication is hierarchical and administrative, safety policies lose their transformative power at the practical level.

The Dominance of Administrative Indicators

The results of document analysis and interviews show that OSH implementation at UBP Barru tends to be measured through administrative indicators, such as the completeness of reports, the achievement of zero accident targets, and compliance audit results. Although these indicators are important, an excessive focus on administrative aspects means that safety practices in the field receive less substantive attention.

Several informants stated that the success of K3 is often assessed based on the "absence of recorded accidents," even though near-misses and risky practices still occur. These findings indicate that K3 policies are practiced as administrative routines rather than as reflective and sustainable risk management mechanisms. From an implementation governance perspective, this administrative orientation weakens the organization's ability to learn from field practices and prevent systemic policy failures.

Theoretical Dialogue: Implementation Governance Perspective

The results of the study indicate that the failure to implement occupational safety and health (OSH) policies at PT PLN Indonesia Power UBP Barru was not caused by a lack of regulations or weak policy design, but rather by implementation governance issues at the operational level. These empirical findings can be understood more comprehensively through dialogue with policy implementation theory and implementation governance. Van Meter and Van Horn's (1975) implementation model emphasizes that the effectiveness of implementation is influenced by the alignment between policy objectives, resources, characteristics of the implementing organization, the disposition of the implementers, and communication between actors. In the context of UBP Barru, this study shows that the lack of synchronization between these variables results in a persistent policy-practice gap.

In particular, the findings regarding the administrative orientation in OSH implementation are in line with the argument of Hill and Hupe (2014), who view implementation as a governance arena, not merely a technical stage of policy execution. The OSH policy at UBP Barru is not only "implemented" but also interpreted and negotiated by actors at the operational level. When operational pressures and resource constraints dominate, the meaning of safety policy is reduced to a formal obligation rather than a substantive value.

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The normalization of risk found in this study can also be explained through the perspective of high-risk organizations. Reason (2016) explains that organizations with repeated exposure to risk tend to develop a tolerance for hazards that are considered “normal,” thereby reducing safety awareness. However, this study expands on this argument by showing that risk normalization is not only a matter of safety culture, but also the result of an implementation governance that does not consistently integrate safety into operational decision-making.

Furthermore, findings regarding weak communication and coordination across units and with contractors reinforce criticism of hierarchical implementation approaches. Matland (1995) asserts that policy implementation in complex and ambiguous contexts requires space for adaptation and interaction between actors. When OSH policy communication is one-way and administrative, the policy loses its adaptive capacity and fails to respond to dynamic field challenges. Thus, the dialectic between data and theory shows that the failure of OSH policy at UBP Barru cannot be adequately explained through a technical or behavioral approach alone. Instead, this failure is a manifestation of weak implementation governance, in which safety policy is not managed as a continuous social and organizational process.

Synthesis of Findings

Based on this analysis and theoretical dialogue, the main findings of this study can be rationalized in three key arguments. First, OSH policies in high-risk public organizations tend to fail when positioned as instruments of administrative compliance rather than as risk governance mechanisms. An excessive focus on formal indicators and reporting creates the illusion of policy success, while risky practices continue in the field. This finding confirms that the success of safety policies cannot be measured solely by the absence of recorded accidents, but by the quality of safety practices that are consistently implemented. Second, the disposition of policy implementers and the normalization of risk must be understood as products of the organizational context and governance of implementation, rather than as moral or individual failures of workers. This study shows that workers and supervisors operate within incentive structures and operational pressures that shape how they interpret safety policies. Thus, policy interventions that focus solely on changing individual behavior are likely to fail if they are not accompanied by improvements in implementation governance.

Third, the findings of this study reinforce the argument that implementation governance is a relevant and necessary analytical perspective for understanding policy failures in high-risk sectors. By repositioning OSH as an issue of public organization governance, this study contributes to the development of policy implementation literature, which has so far paid little attention to the context of occupational safety. This approach also opens space for the development of more adaptive, reflective, and contextual OSH policies, particularly in strategic public organizations such as the power generation sector.

Overall, this discussion emphasizes that the failure of safety policies is not an implementation anomaly, but rather a logical consequence of implementation governance that is not aligned with the complexity of risks and organizational dynamics. Thus, efforts to improve OSH policies need to be directed at strengthening implementation governance, not merely adding regulations or tightening sanctions.

4. Conclusion

This study concludes that the failure to implement occupational safety and health (OSH) policies in high-risk public organizations is not caused solely by regulatory weaknesses or individual behavior, but rather by implementation governance issues at the operational level. A case study at PT PLN Indonesia Power's Barru Generation Unit shows a systemic gap between OSH policy standards and daily work practices, which is influenced by limited implementation capacity, risk normalization, and administrative and hierarchical communication and coordination patterns. Theoretically, this study confirms the relevance of the implementation governance perspective in explaining the failure of safety policies in high-risk public sectors. By repositioning OSH as an organizational governance issue, this study expands the policy implementation literature, which has been dominated by technical and behavioral approaches.

These findings show that safety policies cannot be understood merely as instruments of compliance, but rather as social processes that are practiced and negotiated in complex organizational contexts. The policy implications of this study emphasize the need to shift the focus from adding regulations to

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strengthening implementation governance. Policy makers and public organization management need to align operational performance targets with safety standards, strengthen the capacity of implementers, and build field practice-based organizational learning mechanisms. In practical terms, OSH management needs to be directed towards assessing the quality of safety practices in the field, including reporting and learning from near-misses, as well as strengthening dialogic communication between management and implementers. With this approach, OSH policies have the potential to be implemented in a more substantive and sustainable manner in high-risk public organizations.

Acknowledgments

The author gratefully acknowledges the financial support provided by the Indonesian Education Scholarship (BPI) – Ministry of Education, Culture, Research, and Technology. Sincere appreciation is also extended to the Supervisory Team at the Doctoral Program of Public Administration, Universitas Negeri Makassar (UNM), for their expert guidance and mentorship. Furthermore, the author thanks the UNM Graduate School for providing the essential facilities and academic atmosphere that supported this study.

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