What role can culture play for sustainability in essential services?

Research report

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About

This research report provides a short literature review and reflections from four in depth interviews from experts* in this field on the role organisational culture can play in attaining sustainability in the essential services of water, energy and communications. It forms part of our Sustainability Principles project and explores how principles can shape organisational culture to achieve sustainability.

*Interviews with leading cultural and sustainability practitioners and think tanks were conducted under Chatham House rules. The quotes from the interviews in this report have therefore been anonymised.

Sustainability First

Sustainability First is a think-tank that promotes practical, sustainable solutions to improve environmental, economic, and social wellbeing. We are a registered charity that primarily works in the public utilities, and have a long, proven record of delivering impactful projects that help shape policy, regulation, and company behaviour in the energy and water sectors.

Introduction

Culture underpins everything any organisation tries to do. Crucially, culture and strategy must be aligned otherwise strategies are likely to fail (Groysberg et al., 2018; O'Riordan, 2015; PricewaterhouseCoopers, 2018). Culture needs to be aligned with an organisation's business model (CIPD, 2016) and can also be a key influence on employee engagement and retention (CIPD, 2020).

Despite the importance of culture in achieving organisational change, there is a research gap in this area. Most of the academic research on culture is focused on private companies. Given the variety of definitions, this research can sometimes be inaccessible, and it is not always clear how it can best be implemented. In comparison with research on corporate culture there is less research on culture within policy makers and regulators.

Research into what culture is needed to deliver sustainable outcomes has been limited and mostly focused on the necessary culture for change, than what а culture supporting sustainability may look like. However, there is research on how cultural considerations can address challenges in a rapidly changing environment (Groysberg et al., 2018). And research has been done on how organisational culture can influence organisations' decision-making (Tilley, 2019) which is important if we are going to get a transformational shift towards deeper sustainable practices.

Throughout this report the term essential services is used to refer to the services provided by the energy, water and communications sectors. In the UK, the culture in these sectors has historical roots. Services that were formerly state run and owned, so called public utilities, have for over three decades been provided by private companies (with the exception of water in Scotland where the sector is still in the public sector and Wales where Welsh Water is a mutual). The sectors largely use private capital to deliver public value. The monopoly activities in the sectors tend to be highly regulated to ensure consumer protection. Whilst this regulation has traditionally been primarily based on consumer issues such as price and reliability, it increasingly includes wider social and environmental outcomes to account for the overall impact of these firms.

The changes currently taking place within much of the energy, water and communications sectors are profound and impact all actors — companies, regulators and policy makers (although for somewhat different reasons and to different extents, depending on the sector). Arguably there needs to be a similarly profound cultural change within these sectors if they are to deliver economic, social and environmental wellbeing.

This report analyses how organisational culture, especially within these essential services, can support this transformation. Conclusions are drawn regarding how a principles-based approach could be used to aid that cultural change.

Outline of the report

The report is divided as follows:

- The concept of organisational culture
- Different ways of changing organisational culture, including "measuring" methods and monitoring change;
- Specific issues of organisational culture and cultural change in essential services, in particular, as these relate to regulators and policy makers – and the issue of 'regulating for culture';
- Achieving culture change in complex adaptive systems such as essential services;
- Culture change and sustainability; and
- How these findings may influence the use of principles for sustainable transformation.

Definition of organisational culture

Organisational culture is a complex subject with a rich research history. Frameworks for understanding culture can be divided into three main types according to Howard-Grenville et al. (2015): values based, cognitive frames or interpretations and patterned actions. This research proposes defining organisational culture as a combination of all of these frameworks. However, they also suggest that each approach is useful as they have different implications regarding changing an organisation's culture. Annexe I contains further details about each framework.

Different ways of changing organisational culture

A review in professional and academic literature shows the following general approaches to achieving cultural change (CIPD, 2016; CIPD, 2021; MCG, 2018; McKinsey, 2019; FCA, 2018):

- Evaluate the cultural status quo to know the starting point of change. This requires qualitative measures (e.g. surveys, focus groups, leadership assessment etc), and quantitative proxy measures (e.g. employee retention, performance metrics).
- Decide on the desired culture, which aligns with strategy and business model. This involves deciding on specific cultural attributes or types.
- Select key leverages to focus on to enable change, using stories to make them accessible. Here culture is viewed as a social construct.
- Ensure executive leadership support and willingness to be role models for change, i.e. "walk the talk". It is not enough to only involve executive management.
- 5. Ensure all levels of management and staff have the necessary skills and support to enable change.
- 6. Engage all employees so cultural change is accepted at the start of the process.
- 7. Communicating change effectively is key, including:
 - a. Why cultural change is necessary; and
 - Make the necessary change tangible to each employee using stories depending on their position within the organisation.
- 8. Be aware that cultural change is a long-term endeavour and organisational culture needs continuous monitoring.
- 9. Measure change using the approaches described in step 1.

Organisational culture in government and regulators

Most of the academic research in the area of organisational culture has focused on private companies. As previously noted, in the UK, energy, water (except in Wales and Scotland) and communications companies are privately owned. However, they operate within policy and regulatory frameworks. There is less research on organisational culture in public sector organisations' such as government departments and regulatory bodies. However, research indicates that the cultures of public

bodies can differ from those of private organisations (Hallsworth and Rutter, 2011; Howard-Grenville et al., 2015).

- Turnover rates: One of the indicators for assessing organisational culture in private organisations are turnover rates; and in the civil service this has accelerated in the last two decades, with crucial departments such as the Treasury losing up to a quarter of their staff annually (Sasse and Norris, 2019). Even those staying in the civil service may move frequently between departments and divisions within them, with fast trackers being actively incentivised to do so. This can be debilitating and result in lack of accountability longerterm for impacts of decisions, lack of institutional memory etc. The turnover of Ministers etc can also be high.
- Motivation and values: Whilst public sector employees may be partly motivated to work due to altruism, desire to serve society etc, good pay and job security can also play an important role. O'Riordan (2015) points to the importance of values in the public sector: a public organisation needs the public's trust, which it obtains by embracing certain values such as those outlined in the Seven Principles of Public Life (selflessness, integrity, objectivity, accountability, openness, honesty and leadership). Cultures can be rather riskaverse as negative consequences of errors may be high, but positive consequences of overperformance and innovation may be low (McKinsey, 2019). Much of the research in this area, however, is focused on ethics and elected officials.

Attitudes to change:

Change can have a different connotation within the public sector. Reform can be interpreted as moving from something bad (i.e. old = bureaucratic) to something good (i.e. new = modern). Benefits of existing culture such as continuity, honesty and treating citizens equally are therefore often overlooked (O'Riordan, 2015). If change per se is seen as a negative evaluation of the status quo, resistance may be even higher.

Change efforts within policy making organisations and regulators often span across multiple organisations in contrast to private organisations, which may only need to focus on themselves.

Relevant skills may be lacking across the public sector organisation: leading through change requires specific change management skills, such strong communication skills. structures can often be hierarchical coupled with top-down communication, so leaders may lack collaborative communication skills. compounded by employees whose traditionally at least, may have largely been within the public sector. Skill sets may be very specific among staff, so critical gaps, such as operational delivery and analytic capabilities or change management, might be lacking (McKinsey, 2019).

Nonetheless, public sector organisations such as government departments can have advantages when embarking on organisational culture change. They can tap into resources for talent from much broader parts of society: both for voluntary in-puts and ideas, using tools such as calls for evidence, consultations or competitions open to society (McKinsey, 2019).

- Varying cultures and goals: Just as in private companies, individual cultures can vary within and between government departments. Public sector organisations often have to achieve multiple goals which can be linked to political mandates which may be ambiguous and change with election cycles. Public sector bodies also have different access to resources than private organisations. Leadership often still faces competition, though, namely regarding resources and influence, which can make organisation-wide agreement on purpose and collaboration harder. A collective responsibility for issues among management may be missing as a result (Leslie & Tilley, 2004; McKinsey, 2019).
- Regulatory culture: There is limited research on the culture within regulatory bodies.
 Regulatory culture tends to be regulator specific. Regulators in general tend to have less control over their internal goals, which are often not chosen by their own leadership, and they tend to have to pursue multiple goals at once. This can make it difficult to align the organisational culture to these goals (Howard-Grenville et al., 2015).

"Change in the essential services sector requires systems change. Currently, system change focuses mostly on

what we can see, but culture is intangible. The sector is often shaped by risk and reactionary approaches."¹

Regulators are increasingly aware of the importance of culture in the sectors and companies that they regulate to deliver their duties. However, they have traditionally been nervous about 'regulating for culture' per se. They have pointed out that culture cannot be imposed from the outside on those regulated and noted that responsibility for delivering change lies with those entrusted with governance and leadership.

Regulating for culture?

Regulators are increasingly aware of the importance of culture in the sectors and companies that they regulate to deliver their duties. However, they have traditionally been nervous about 'regulating for culture' per se. They have pointed out that culture cannot be imposed from the outside on those regulated and noted that responsibility for delivering change lies with those entrusted with governance and leadership.

In areas such as financial services, regulators are, however, actively tasked with influencing organisational culture in the companies they regulate. After 2008 and the financial crash, it has been recognised that culture can be the main influence on corporate conduct, with consumers, employees and stakeholders being seen at risk of serious harm if company conduct is poor (Atkins et al., 2020; FCA, 2018). A key part of that historically has been to generate debate about culture to bring the interdependence between organisational culture and public trust to the foreground. Culture is now a key part of the Financial Conduct Authority's (FCA) supervision practice which requires leaders of regulated companies to be accountable for their individual behaviour as well as that of their whole organisation. The goal is to get companies to move beyond a culture of rule compliance and embrace true cultural change (FCA, 2018).

In the **water sector**, Ofwat has carried out significant work on board leadership and governance which has highlighted the importance of purpose, values and culture (Ofwat, 2019). And the **energy crisis** is leading Ofgem to consider issues around supplier governance and accountability (Ofgem, 2021) of which culture should be a part.

A general challenge in this context is the information asymmetry that arises from a regulator's necessarily

¹ Excerpt from an interview with a senior UK academic

restricted view into the culture of the companies they regulate, given they only gain limited physical access and rely on information provided to them by companies (Howard-Grenville et al., 2015). It is worth noting that the introduction of Customer Challenge Groups in the water sector and Customer Engagement and User Groups in the energy networks sector has provided regulators with the opportunity for new insights on utility culture. However, the potential of these independent, grass-roots but armslength groups has arguably yet to be maximised by regulators (Sustainability First, July 2021).

Further challenges for regulators arise from not being able to measure culture the same as other aspects of business and the acknowledgement that focusing solely on influencing companies' leaderships may not be enough (FCA, 2018). It is important to be aware that a regulator's culture influences the relationship they have with those they regulate, in particular it also influences the culture of those regulated (Howard-Grenville et al., 2015).

Given the complex systems policy makers operate in, Muers (2018) suggests adopting a facilitative culture, which encourages others to develop solutions. Viewing policy making and delivery as one can be easier in such a culture and likely to produce better results. However, this means the understanding of policy success may need to be reviewed, with trial-and-error approaches becoming accepted and policy makers adjusting their role.

Essential services – complex adaptive systems

The energy, water and communications sectors can be understood as complex systems in two respects: technically complex due to the physical networks involved; and organisationally complex as they comprise companies, regulators, policy makers, supply chain actors, individual customers (whose behaviour can help both solve and add to problems) and civil society groups - that often need to work together to deliver sustainable outcomes – and where feedback loops can lead to uncertainty and dynamism, increasing the need for adaptive approaches. This report is concerned with the second point only. However, this can clearly be influenced by the more technical challenges involved.

Arguably, the regulatory framework in all three sectors concerned involves multiple levels and actors, which can lead to incoherence across the sector(s) with rules potentially being interpreted differently by different actors, or areas being overlooked. Approaching regulation and culture using a system thinking lens can therefore be useful (Corbett, 2015).

Solutions proposed have traditionally focussed on the 'hard' levers of change such as institutional arrangements that concentrate decision-making in one hand.

Increasingly, greater focus is being place on facilitating a culture of collaboration between regulators, for example the Regulators' Alliance for Progressing Infrastructure Development (RAPID) in water (Ofwat, 2022) or the UK Regulators Network (UKRN). Collaborative learning as well as trial and error approaches will be important to facilitate this type of collaborative culture and maximise its impact.

Moving whole systems towards a transition for sustainability undoubtedly requires system changes, making it beneficial to know how to translate requirements for organisational change within organisations, public or private, to whole systems. The interactions between the different organisation types within a sector are important. It is necessary to better understand how regulators can influence and shape organisational culture in the companies they regulate - as well as the relationship between policy makers and regulators who are delivering those policies. Understanding the interactions between actors and cultures in different sectors is also important if resource and technical, behaviour interdependencies are to be addressed and the opportunities for breakthrough innovation to be realised.

Learning capabilities are key for dealing with changing environments. Organisational culture plays a vital role in such a context. Not only can attributes such as risk appetite, attitudes towards collaboration and awareness of external contexts inform the type of knowledge that is adopted, learning within a network as part of a complex system (as opposed to learning within an organisation) inevitably requires organisations to be flexible, collaborative and willing to dispense with hierarchical cultures (McKenzie, 2021).

What conditions are needed to create learning networks for systems change?

- Mindsets: decentralised, structures for emergence (eg governance, mutual accountabilities etc), letting go of certainty
- Relationships: Trust, installing 'boundary spanners'/cross-boundary facilitators
- Processes: co-development of learning strategies, collective sensemaking, experimentation, critical reflection
- Structures: Collective memories and learning, simple evaluation frameworks

Source: McKenzie, F., 2021. Building a culture of learning at scale: learning networks for systems change

Why does organisational culture matter for sustainability transformations?

In contrast to other reasons for cultural change, such as improving financial success, sustainability, due to its holistic nature, permeates organisations as a whole. Therefore, if organisations want to be truly sustainable in the way they conduct business, regulate business or make policy, cultural change for sustainability is essential (Fietz and Günther, 2021; Linnenluecke and Griffiths, 2010; Network for Business Sustainability, 2010).

Organisations often seek to adopt sustainability via strategic measures, or through adopting specific structures and processes. In so doing, sustainability is still often viewed as an "add-on" rather than integral part of the organisation's modus operandi. This is in stark contrast to the fact that to be truly meaningful, sustainability considerations need to affect decisions and processes in every part of an organisation. It is unsurprising that failing to account for cultural changes when adopting sustainability is a main cause of failure (Fietz and Günther, 2021).

Sustainability and culture change

As with other culture change initiatives, to be successful, sustainability considerations need to be aligned with an organisation's strategy, purpose and values. However, sustainability can be different to other culture change activities:

- Integrated approach necessary: To be truly sustainable, business models, policies and procedures, and approaches to regulations/policy-making may also need to change substantially. A sustainability culture needs to be embedded across the whole organisation, shaping recruitment, reward and incentives.
- New metrics and assurance processes
 needed: The decision to adopt sustainability
 approaches is often caused by external social,
 environmental and economic pressures, with
 costs and benefits not always obvious. For
 these wider pressures to be reflected in
 decision making and organisational culture
 requires new metrics, ways of reporting and
 demonstrating assurance (Sustainability First,
 2020).
- New skills to navigate trade-offs: Sustainability often requires navigating difficult social, environmental and economic trade-offs, balancing competing interests and seeking common ground. This requires an approach which focuses the business above and beyond compliance to also take account of the wider external context.
- Dynamism, flexibility and iteration essential:
 Sustainability by its nature is an ongoing process and a challenge that is continually

- changing. Social and environmental issues are not static but subject to complex relationships and feedback loops.

 Sustainability therefore requires an adaptive and flexible culture and an iterative approach to change, that accepts appropriate failure.
- Recognition of wider levers for change for sustainability: These can often be found outside organisations, such as within a company's supply chain or with key stakeholders such as NGOs.
- Greater focus on collaboration:
 Interorganisational collaboration is often important for sustainability. This requires far greater focus on partnerships working and ensuring the fair share of risk and reward.
- Leadership & Facilitation: Given sustainable approaches may require working across silos, culture change initiatives for sustainability often require working out who is best placed to lead on what, who can facilitate change and learning and a willingness to proactively address issues around roles and responsibilities.

Various proposals have been put forward as to how to change organisational cultures to drive sustainability:

- Values: Change the values the organisation embraces to reflect the requirements of sustainability. Concrete suggestions are extremely scarce, but so far have tended to acknowledge environmental values (Fietz and Günther, 2021). There is a question as to whether values underpinning environmental principles (such as the polluter pays principle) may also be helpful when considering the delivery of social outcomes.
- Fostering an open learning culture: Learning
 is widely acknowledged as being key for
 organisational change. As explored above,
 learning networks for systems change may
 also be important.
- Engagement and governance: More inclusive processes, including meaningful stakeholder engagement and robust governance, which reflects the diversity of stakeholders impacted by the organisation's work, are important to enable the insights, knowledge and culture that will foster sustainability. This is particularly the case around the delivery of fair outcomes, public purpose and the social aspects of

- sustainability (Sustainability First, September 2021).
- Safe spaces: These can help encourage an innovation culture, fast failure and build trust between different actors. They are particularly important when it comes to culture change and sustainability when success can often only be achieved by different actors working together and over time (Sustainability First, September 2021).
- Compelling narratives and stories: Including sustainability into an organisation's storytelling in order to normalize and legitimize it within its culture is important to embed change (Tilley, 2019).

Cultural change is **often limited to using "words"** [about cultural change], when in reality it is concrete actions that need to be taken; ... it is important to understand incentives for decisions"²

Regulators aiming to influence companies' organisational cultures or policy makers seeking to provide frameworks for sustainability need to consider their own cultures (Hallsworth and Rutter, 2011; Howard-Grenville et al., 2015). Our Sustainability Principles project is focused on this issue: how to align cultures and principles between these different actors to better support the transformational shift towards sustainability now taking place.

How might sustainability principles support cultural change in essential services?

The following proposals begin to set out how sustainability principles may support cultural change in essential services:

- Make values and principles real: Any change effort needs to be guided by a minimum number of values. These can also be framed as principles (e.g. collaboration). It is crucial to underpin such principles with tangible stories to make them accessible for different actors, often operating in different silos, as well as at different hierarchical levels.
- Use principles to focus on what a sustainability culture might look like: The literature review shows that theories about organisational culture for sustainability are in their infancy. Principles focused on sustainability may help shift from rather

- generic values needed for organisational cultural change to more specific values for culture for sustainability.
- Link principles to systems learning and systems change: The organisational cultural pre-conditions for systems learning are well outlined by McKenzie (2021). However, the link to sustainability is not clearly in scope. Sustainability principles could be designed to not only guide organisational culture of the systems' actors, but also of the whole learning network of the whole system.

Summary

Organisational culture in corporations is well-researched, but the huge variety of definitions can make the area inaccessible or too academic for any practical application. At the same time, organisational culture in policy makers and regulators, as well as the implications of culture for the interaction between regulator and regulated, is far less established.

Conceptualisations of organisational culture for sustainability are vague, making it difficult to draw on existing knowledge in practice. Much of the research identified in this area for this report has a rather generic focus on cultures facilitating organisational change triggered by (often external) pressures to move towards implementing sustainability into working practices.

Principles provide an opportunity to make the necessary changes in culture tangible. Principles can provide the basis for stories about the transformation for sustainability in sectors such as energy, water and communications. Sustainability principles may provide support in defining the understanding of what is meant by an organisational culture for sustainability. Moreover, they may be used to derive cultural pre-conditions for the necessary systems change; a culture of learning in particular. Last, principles could help regulators, policy makers and companies navigate the complexities in these sectors for a more sustainable future.

² Excerpt from interview with senior professional of a global consultancy firm

Annexe

Three frameworks for understanding organisational culture:

- Values based frameworks: Schein sees organisational culture as three interacting layers: 1 basic assumptions, 2 values and 3 artifacts. Basic assumptions are the subconscious beliefs about reality of an organisation's members. Values are the social principles, goals and rationalisations people share. They must have stood the test of time and work. The third layer comprises visible manifestations of culture, so called "artifacts". They include: behaviour, rituals, stories, language, objects such as dress, logos, products, and can be observed Schein (1985).
- 2. Cognitive frameworks: This approach views organisational culture as constructed by its members through subjective interpretations of reality. The meaning of artifacts depends on their context and the interpretation is more important than the artifacts themselves (Geertz, 1973). Members use cognitive structures to interpret information, so-called "frames" e.g.: Who tells the story in reports: Whose pictures are shown? Interpretations of the same observable artifacts may vary, so organisational culture is no longer seen as uniform. 'One way to interpret culture this way is to think in terms of stories: not only is the content important but crucially who tells stories and how listeners respond (Boje, 1991).'
- 3. **Frameworks reflecting patterns of behaviour**: Culture can also be seen as a set of patterned behaviours or actions (Howard-Grenville et al., 2015; Swidler, 1986). This explains culture through socially accepted actions rather than guided by intangible, subconscious values or cognitive frames; members are active contributors to culture. The same action, such as stories, symbols, roles, may be used for different means. In this view, organisational culture is less an attribute that can be managed but rather the way an organisation is.

It is worth remembering that each framework has advantages and shortcomings as organisational culture is a complex topic. In particular, they each point to different approaches to changing an organisation's culture.

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 Thesis.

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